

***Appendix E***  
***Scoping Summary Report***

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**Southern California Edison  
Eldorado–Ivanpah Transmission Project  
Scoping Summary Report**

**October 14, 2009**

Prepared for the  
United States Bureau of Land Management



and the  
California Public Utilities Commission



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## TABLE OF CONTENTS

<b>Section</b>		<b>Page</b>
<b>1</b>	<b>INTRODUCTION.....</b>	<b>1</b>
	1.1 Purpose of Scoping Report.....	1
	1.2 Project Description.....	1
<b>2</b>	<b>SCOPING PERIOD AND MEETINGS.....</b>	<b>3</b>
	2.1 NEPA & CEQA Requirements for Scoping.....	3
	2.2 Scoping Meetings.....	3
	2.3 Other Scoping Activities.....	4
	2.4 Repositories for Public Documents for the Project.....	4
<b>3</b>	<b>SUMMARY OF PUBLIC AND AGENCY COMMENTS .....</b>	<b>5</b>
<b>4</b>	<b>NEXT STEPS IN THE EIR/EIS PROCESS.....</b>	<b>15</b>

## LIST OF FIGURES

<b>Figure</b>		<b>Page</b>
Figure 1	Project Overview .....	2

## LIST OF TABLES

<b>Table</b>		<b>Page</b>
Table 1	Summary of General Procedural Comments Received .....	5
Table 2	Summary of all Comments Received, Organized by EIR/EIS Resource Area.....	9
Table 3	Next Steps in the EIR/EIS Process and Opportunities for Further Agency/Public Comments .....	15

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## LIST OF APPENDICES

- A. Notice of Intent published in Federal Register on July 27, 2009
- B. Notice of Preparation published July 23, 2009
- C. Notice of Public Scoping Meetings and Mailing List
- D. Scoping Notice Postcard
- E. Scoping Meeting Fact Sheets
  - 1: What is a Transmission Project (English)
  - 2: Project Overview (English)
  - 3: Project Overview (Spanish)
  - 4: Electric and Magnetic Fields (English)
  - 5: Audible Noise (English)
  - 6: Public Scoping and Public Involvement: *An Overview* (English)
  - 7: Public Scoping and Public Involvement: *An Overview* (Spanish)
- F. Scoping Meeting PowerPoint
- G. Comments Received During the Scoping Process
- H. Scoping Meeting Sign-In Sheets
  - 1. Nipton Meeting
  - 2. Las Vegas Meeting

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## ABBREVIATIONS AND ACRONYMS

<b>Abbreviation/Acronym</b>	<b>Item</b>
BCCE	Boulder City Conservation Easement
BLM	Bureau of Land Management
CCDOA	Clark County Department of Aviation
CCR	California Code of Regulations
CDB	Center for Biological Diversity
CDCA	California Desert Conservation Area
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CPUC	California Public Utilities Commission
DWMA	Desert Wildlife Management Area
E & E	Ecology and Environment, Inc.
EIR	Environmental Impact Report (Draft EIR) (under CEQA)
EIS	Environmental Impact Statement (Draft EIS) (under NEPA)
EITP	Eldorado-Ivanpah Transmission Project
EPA	Environmental Protection Agency
kV	kilovolt
MSHCP	Multiple Species Habitat Conservation Plan
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NOP	Notice of Preparation
ROW	rights-of way
SCE	Southern California Edison
SNSA	Southern Nevada Supplemental Airport

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# 1 INTRODUCTION

## 1.1 Purpose of Scoping Report

This Scoping Report summarizes the public scoping effort conducted for the proposed Eldorado–Ivanpah Transmission Project (EITP). On May 28, 2009 Southern California Edison (SCE), the project applicant, filed an application with the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity and an application with the U.S. Bureau of Land Management (BLM) for right-of-way (ROW) authorization and special use permits for approval to construct the proposed project. As part of the project approval process and in compliance with the requirements of the California Environment Quality Act (CEQA) and the National Environmental Policy Act (NEPA), the CPUC and the BLM, as CEQA and NEPA lead agencies, will prepare a joint Environmental Impact Report (EIR) and Environmental Impact Statement (EIS), via their third-party consultant, Ecology and Environment, Inc. (E & E). The EIR/EIS will evaluate the potential environmental impacts associated with the proposed project and will identify mitigation measures to reduce these impacts, where possible. The public scoping period allows the public and regulatory agencies an opportunity to comment on the scope of the environmental document and to identify issues that should be addressed in the document. This report documents the issues and concerns expressed during the public scoping meetings and the written comments received from the public, community organizations, and governmental agencies during the public scoping period, which ended on August 26, 2009.

The CPUC and the BLM will use the comments received during the scoping period to:

- Present environmental impacts of the proposed project and alternatives;
- Encourage public participation;
- Determine the range of issues and alternatives to be addressed in the EIR/EIS;
- Identify ways to avoid or reduce environmental impacts; and
- Inform BLM and CPUC decision-making processes.

## 1.2 Project Description

The EITP is located in San Bernardino County, California, and Clark County, Nevada. SCE filed an electronic application on May 28, 2009, for a permit to upgrade a single-circuit 115 kilovolt (kV) transmission line with a double-circuit 230 kV transmission line and construct a new substation and associated telecommunications and transmission lines (CPUC application number A.09-05-027). The proposed project would run approximately 35 miles from the Eldorado Substation in Nevada to SCE's proposed Ivanpah Substation in California (Figure 1). The project would include upgrades to the Eldorado Substation and installation of approximately 35 miles of redundant overhead, underground, or microwave path telecommunication routes.

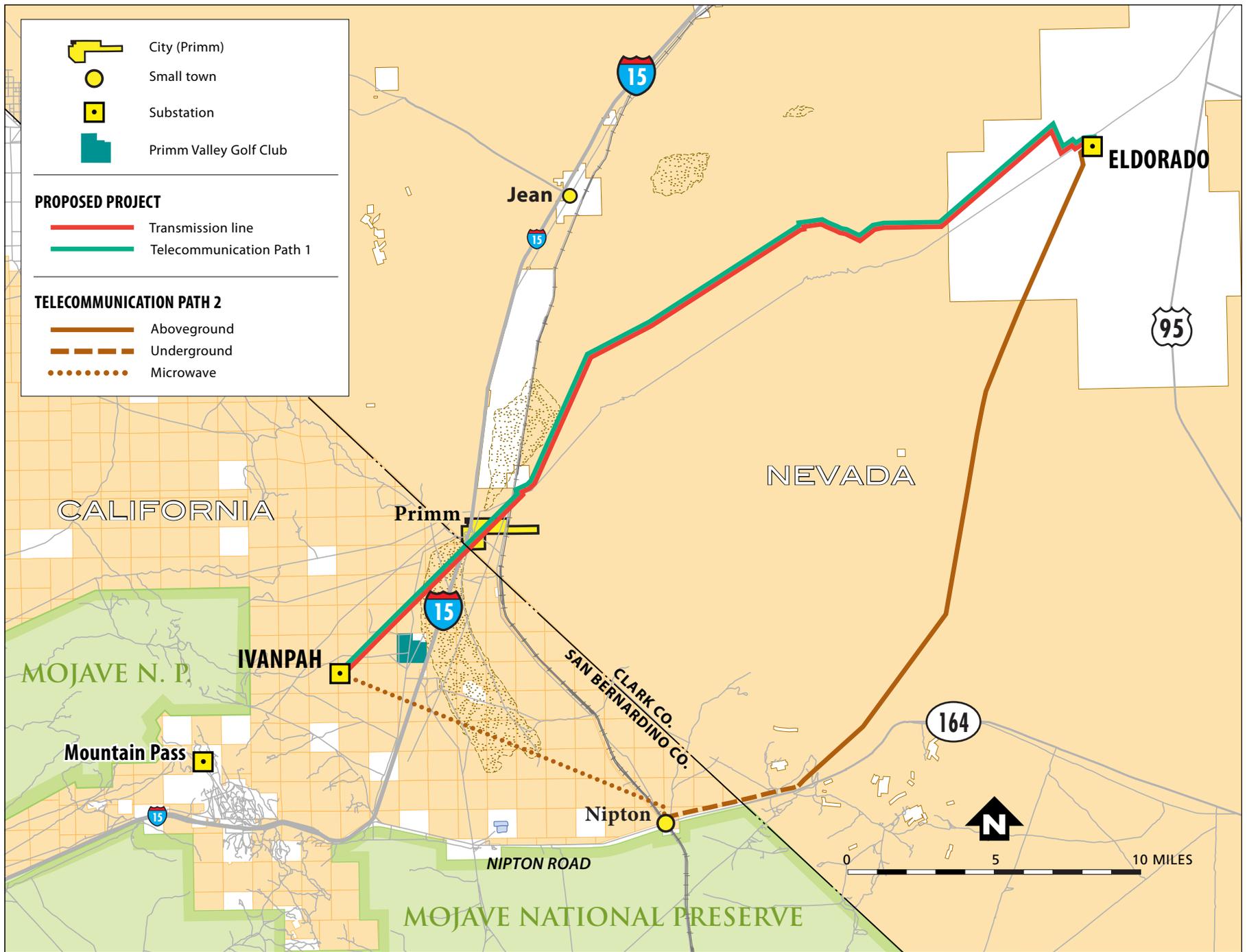


Figure 1 **PROPOSED PROJECT**

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## 2 SCOPING PERIOD AND MEETINGS

### 2.1 NEPA & CEQA Requirements for Scoping

The lead agencies have agreed to cooperate in preparation of a joint EIR/EIS document that satisfies the needs of both NEPA and CEQA. Once developed, the EIR/EIS will provide full disclosure of the environmental effects of the proposed project and will be a tool used to plan actions and make decisions regarding the project. In addition, it will provide a means of informing stakeholders of reasonable alternatives that would avoid or minimize adverse impacts on the environment or enhance its quality.

Scoping is a means of gathering input for the EIR/EIS early in the EIR/EIS development process. Scoping is required by NEPA pursuant to the Council on Environmental Quality 1979 regulations (40 Code of Federal Regulations [CFR] 1501.7) and by CEQA for projects of “statewide, regional or area-wide significance” per §21083 of the California Public Resources Code. This process ensures that significant public issues, alternatives, and impacts are addressed in environmental documents, and determines the scope and degree to which these issues and impacts will be analyzed.

**Notice of Intent (NOI).** The scoping period for NEPA began on July 27, 2009, with publication of the NOI in the *Federal Register*.

**Notice of Preparation (NOP).** The NOP for CEQA was provided to the California State Clearinghouse for release on July 23, 2009. The NOP was mailed to 118 residents and nongovernmental organizations to inform the public of the proposed project and provide notice for the public scoping meetings (Appendix B).

The NOI and NOP were published to notify interested parties of the BLM and the CPUC’s intent to prepare an EIR/EIS. The scoping period for the NOI and NOP ended on August 26, 2009.

The following interested parties may participate in scoping: federal, state, regional, and city agencies; affected tribes and communities; businesses; and interested groups and individuals.

### 2.2 Scoping Meetings

When public scoping is conducted, NEPA requires that public meetings be conducted in accordance with statutory requirements and other criteria (e.g., consideration of the interest in or environmental controversy of the proposed project) (40 CFR 1506.6(c)). CEQA recommends that public scoping be combined to the extent possible with consultation with responsible agencies, as required under 14 California Code of Regulations (CCR) 15802. Consultation is conducted with agencies that will be involved in the environmental review process locally, as well as state and federal agencies and tribal governments, as appropriate.

The BLM and the CPUC conducted joint public scoping meetings along the proposed route in Nipton, California, on Tuesday, July 28, 2009, and Las Vegas, Nevada, on Wednesday, July 29, 2009.

An open house was held for one hour prior to each meeting so that participants could review displays, maps, and literature, as well as meet members of the EIR/EIS project team, agency staff, and project personnel. To encourage public comment, repositories were provided to receive written comments. Several informational sheets about the proposed project and extra copies of the NOI/NOP were made available to the public at each venue.

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Each scoping meeting began with presentations by the BLM and the CPUC describing their roles as lead agencies under the NEPA/CEQA processes, followed by an overview of the technical aspects of the proposed project. This included a detailed presentation of the current route, accompanied by a justification for the project need. Lastly, the environmental consulting firm preparing the EIR/EIS for BLM and the CPUC described their role as third-party consultant, described opportunities for public involvement, and provided an overview of the environmental issues already identified to be addressed.

Each meeting concluded with a public comment period where the agencies invited the public to make verbal comments on the project. A court reporter was available to record comments. In addition to having the opportunity to provide oral comments on the project, participants were also given the opportunity at the meetings to provide written comments or to take a comment form to fill out and mail in at a later date. Attendees of the meetings were encouraged to take additional comment forms with them to distribute. Nine persons attended the two scoping meetings and open houses in Nipton and Las Vegas.

No verbal comments were received during these scoping meetings; however, the BLM and the CPUC received electronic letters from elected officials, agencies, organizations, and private citizens, by the August 26, 2009, deadline (Appendix G).

## 2.3 Other Scoping Activities

Other scoping activities included:

- An interagency pre-scoping meeting was held on July 1, 2009. Invitees included the Federal Aviation Administration, Western Pacific Region, Airports Division; Mojave National Preserve; United States Fish and Wildlife Service; California Department of Fish and Game; California Department of Transportation; Nevada Division of Environmental Protection, Bureau of Waste Management; Nevada Division of Wildlife, Southern Region; Nevada Public Utilities Commission; San Bernardino County Planning Department; Clark County Department of Aviation; Clark County Department of Planning; Clark County Desert Conservation Program; Boulder City, Nevada, Community Development; and the Town of Laughlin, Nevada, Manager's Office. The agencies were briefed on the proposed project so they could determine their roles in the environmental document, provide better feedback in their scoping comments, and identify key issues early in the scoping process. Minutes from this agency Scoping Meeting and comments from the agencies are included as an appendix to this report (Appendix G).
- Contact with Native American tribes that may have an interest in the proposed project was initiated in accordance with 40 CFR 1501.7, which requires that scoping must be conducted both internally with appropriate BLM staff and include tribes. The following tribes were given notice of the project as the first step in the consultation process: Chemehuevi Indian Tribe, Colorado River Indian Tribes, Fort Mohave Indian Reservation, Las Vegas Paiute Tribe, Moapa Band of Paiute Indians, Pahrump Paiute Tribe, and Timbisha Shoshone Tribe.

## 2.4 Repositories for Public Documents for the Project

Copies of the draft and final EIR/EIS will be placed in local repositories to accommodate public review. Documents produced during the course of the environmental review process will be available for public review at the Las Vegas BLM Field Office and at the Las Vegas Library located at 833 Las Vegas Boulevard North in Las Vegas, Nevada.

A CPUC website dedicated to the proposed project exists at <http://www.cpuc.ca.gov/Environment/info/ene/ivanpah/ivanpah.html> and will serve as an additional repository. Project information will also be posted on the BLM website at: <http://www.blm.gov/ca/st/en/fo/needles.html>.

### 3 SUMMARY OF PUBLIC AND AGENCY COMMENTS

This section summarizes the comments received during scoping and identifies the scoping issues to be addressed in the EIR/EIS. Elected officials, agencies, and organizations submitted comments. No comments were received from private citizens. Because the purpose of this scoping summary report is to convey public comments, the comments reflect the views of the author and may contain factual errors.

The following governmental agencies provided comments: Clark County Department of Aviation, Clark County Desert Conservation Program, Mojave Desert Air Quality Management District, Nevada Department of Wildlife, Federal Aviation Administration (FAA), California Department of Transportation (Caltrans), National Park Service, and California Department of Fish and Game (CDFG). In addition, the United States Environmental Protection Agency (EPA) and the Clark County Department of Air Quality and Environmental Management each provided a letter stating receipt of the NOI; however, the letter did not include any formal comments.

The following non-governmental organizations provided comments: Sierra Club, San Gregorio Chapter, and the Center for Biological Diversity. To date, no comments have been received from public officials, individuals, or tribes.

Four primary areas of concern were identified during the public scoping process. These issues were: (1) impacts of the project on several biological resources, most prominently, Desert Tortoise; (2) compatibility of the project with regional land uses such as the planned Southern Nevada Supplemental Airport (SNSA); (3) compatibility of the project with other existing rights-of-way (ROW) designations; and (4) cumulative impacts.

In accordance with 40 CFR 1503.4, which requires that all substantive comments must be considered to the extent feasible prior to project decisions, comments received during the scoping period were categorized by issue and included in this document. Tables 1 and 2 identify key issue comments and organize them into two categories, not resource-specific and resource-specific. Comments that were not specific to any of the environmental resource areas include procedural and general issues related to project development (Table 1). Resource-specific comments are those that address specific environmental resource areas (e.g. Air quality and Biological Resources) (Table 2). For more information, including copies of each comment received to date, please refer to Appendix G.

Issue Category	Issue Characterization	Commenter
<b>ALTERNATIVES</b>		
<i>Alternatives</i>	0009-4: BLM should formulate “meaningful alternatives that could avoid many of the impacts of the [cumulative projects] and where impacts remain that cannot be avoided through alternatives, provide for comprehensive minimization and mitigation measures that will ensure that impacts to [the Northeastern Mojave Recovery Unit] are appropriately mitigated. Ultimately, BLM must ensure that the approval of these linked projects does not impair the recovery of the desert tortoise populations...”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.

<b>Table 1 Summary of General Procedural Comments Received</b>		
<b>Issue Category</b>	<b>Issue Characterization</b>	<b>Commenter</b>
	0009-5: A range of alternatives should be developed and analyzed according to CEQA guidelines, possibly including alternative sites—including those that may require changes in land use designations—as well as alternatives that may be less profitable than the proposed project.	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0009-6: A range of alternatives should be developed and analyzed according to NEPA guidelines, with an “emphasis on what is ‘reasonable’ rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0009-7: The BLM should avoid impacts to wildlife from conflicting land uses and impacts to sensitive plant species pursuant to the BLM’s California Desert Conservation Area plan (CDCA Plan 28 and 37, respectively). “Avoidance can best be accomplished through alternative project siting and/or project design.” Most important are alternative sites that may avoid impacts to desert tortoises, critical habitat, DWMAs, and other essential desert tortoise habitat.	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0009-11: “...the EIR/EIS should explore a more robust range of alternatives providing at least one alternative that does not impact any [desert tortoise] critical habitat.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0009-16: If the project as proposed may affect riparian areas or Unusual Plant Assemblages, “alternatives must be explored that would avoid all impacts.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
<b>CUMULATIVE IMPACTS</b>		
<i>Cumulative</i>	0006-10: In addition to lighting that may be required by the FAA for EITP structures near the proposed SNSA, “there are several existing transmission lines near the project area that may need to be lighted when the SNSA becomes operational. To that end, BLM should consider both the direct and the potential cumulative effects of any required lighting of the new EITP lines.”	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0006-12: The Ivanpah to Eldorado Transmission Project in Relation to Other Energy Projects Map contains mistakes regarding land status in Clark County. For example: <ul style="list-style-type: none"> <li>- “The map depicts BLM solar project leases inside the [SNSA] Site. [That site] was patented to Clark County in 2004. Clark County did not take title subject to any existing leases, and BLM has no legal authority, since the land was transferred, to accept any leases on the now private property.”</li> <li>- “The map also depicts several categories of land northwest of Jean as ‘BLM wind project leases (authorized).’ CCDOA is aware of at least one lease (the proposed Table Mountain Wind Co. project) that has not yet received a Record of Decision from BLM.”</li> <li>- “In addition, the map depicts a series of solar project leases throughout the South County, many of which overlap the Airport Environs Overlay District. BLM should amend the map to include the perimeter of the Overlay District and to clarify that none of these solar leases are yet authorized.”</li> </ul>	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.

<b>Table 1 Summary of General Procedural Comments Received</b>		
<b>Issue Category</b>	<b>Issue Characterization</b>	<b>Commenter</b>
	0007-3: Conduct cumulative analysis to evaluate impacts on the Northeastern Mojave Recovery Unit from other renewable energy projects in the area. “The EIR/EIS will be inadequate if it fails to consider cumulative impacts [from both the project and related energy projects] on nearly 8,000 acres of desert tortoise habitat in the eastern Ivanpah Valley.”	Sidney Silliman, Sierra Club-San Gorgonio Chapter, 8/21/09.
	0009-3: Cumulative impacts to biological resources, such as desert tortoise and its habitat should be analyzed for “the proposed solar projects and the proposed transmission line and substation.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0010-5: Suggested addressing potential impacts to the white-margin beardtongue in the cumulative section, given the amount of development in the area.	Fred Edwards, BLM, Scoping Meeting, 7/01/09.
	0010-7: While the project would not require nighttime lighting and would use non-speculative materials, impacts to natural dark would have to be addressed in the cumulative impacts analysis.	Larry Whalen, National Park Service, Scoping Meeting, 7/01/09.
	0010-8: Wants to know if cumulative impacts due to land construction had been quantified.	Becky Jones, CDFG, Scoping Meeting, 7/01/09.
	0010-11: Acquire a list of Bolder City’s Future Projects from Bolder City.	Sue Wainscott, Clark County Desert Conservation Program, Scoping Meeting, 7/01/09.
	0010-12: Some of the footprints for solar development in the area on the cumulative map were misplaced or incorrectly sized.	BLM Representatives, Scoping Meeting, 7/01/09
<b>PURPOSE AND NEED</b>		
<i>Need for the Project</i>	0009-1: Purpose and Need for the project is based upon need to service other projects which have not been approved. “...NEPA review cannot be ‘used to rationalize or justify decisions already made.’”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
<b>REGULATORY GUIDELINES AND CONSISTENCY</b>		
<i>Regulatory Guidelines</i>	0009-2: Because the purpose and need of the proposed project is dependent upon the approval of other projects, the BLM should halt the NEPA process for this project and coordinate this process with the approval process for all of the other projects (i.e., “connected actions”). The BLM should evaluate these projects together and “not treat this critical analysis as a cumulative impacts question alone.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
<b>GENERAL COMMENTS</b>		
<i>General</i>	0003-6: “...information gathered from raptor surveys associated with the project [should] be shared with [Nevada Department of Wildlife] biological staff.”	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0005-3: Requests documentation describing “the formal designation and legal descriptions” of several corridors near the BCCE that appear to be reserved for ROW issuance with US Land Patent 27-95-0022. “Until such time as those documents are provided and the corridor issue is resolved, it is the County’s position that the BCCE, and its terms and conditions, applies to any expansion of existing ROW or any additional ROW on the BCCE.”	Sue Wainscott, Clark County Desert Conservation Program, 7/24/09.

**Table 1 Summary of General Procedural Comments Received**

Issue Category	Issue Characterization	Commenter
	0006-1: "CCDOA formally requests to be a cooperating agency for the EITP EIS" to ensure land use compatibility between the future SNSA and the EITP.	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0006-8: "CCDOA is prepared to assist the project applicant and/or BLM in determining any necessary measures to avoid any adverse effects to air navigation or to the SNSA."	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0008-1: Requests two CDs and one hard copy of the DEIS.	Ann McPherson, Environmental Protection Agency, 8/24/09.
	0010-2: Representatives from the Clark County Department of Aviation noted that they have been attending ongoing meetings with SCE regarding the project and had another meeting scheduled for the end of the month.	Clark County Department of Aviation, Scoping Meeting, 7/01/09
	0011-4: Review Boulder City Ordinances, Nevada State Cactus and Yucca laws and other local and state regulations for compliance.	Lee Bice, Clark County Desert Conservation Program, 8/28/09.

<b>Table 2 Summary of all Comments Received, Organized by EIR/EIS Resource Area</b>		
<b>Issue Category</b>	<b>Issue Characterization</b>	<b>Commenter</b>
<b>AESTHETICS</b>		
<i>No comments.</i>		
<b>AGRICULTURE AND SOILS</b>		
<i>No comments.</i>		
<b>AIR QUALITY</b>		
<i>Impacts on Air Quality</i>	0004-1: Air quality impacts associated with construction should be evaluated.	Alan J. De Salvio, Mojave Desert Air Quality Management District, 7/30/09.
<b>BIOLOGICAL RESOURCES</b>		
<i>Impacts on Migratory Birds</i>	0003-4: “Measures to discourage roosting on powerlines should be adopted into the plan of development.”	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09
	0003-5: “...spacing of the terminals on the towers must be adequate to ameliorate collision threats involving large raptors like the Golden eagle and Red-Tailed hawk. Standard, raptor-friendly designs are outlined in ‘Suggested Practice for Raptor Protection on Power Lines’ (Avian Power Line Interaction Committee, 2006, 1996; APLIC and U.S. Fish & Wildlife Service 2005). These should be incorporated into the project design as a standard operating procedure.”	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0003-9: “Pre-construction surveys will be conducted for migratory birds such as Phainopepla to minimize potential impacts during the spring and summer months.”	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0009-14: “Consultations should be conducted with the Nevada Department of Wildlife [regarding the Wee Thump Joshua Tree Forest Important Bird Area] and should include consideration of mitigation measures such as seasonal work stoppages to protect the breeding activity [of bird species].”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
<i>Impacts on Vegetation</i>	0005-5: According to NRS 527.100, it is unlawful to “cut, destroy, mutilate, remove, or possess any Christmas tree, cactus, yucca from any of the lands owned by or under the jurisdiction of the State of Nevada or its counties,” including “all areas within the BCCE.”	Sue Wainscott, Clark County Desert Conservation Program, 7/24/09.
	0009-8: The project route crosses White-margined penstemon ( <i>Penstemon albomarginatus</i> ) populations. “A pre-activity inventory should be conducted in areas of potential and known habitats, and the populations found or known clearly marked on the ground. Activities associated with tower construction or modification, line pulling and other potentially ground disturbing activities should be sited away from inventoried occupied sites whenever possible.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.

**Table 2 Summary of all Comments Received, Organized by EIR/EIS Resource Area**

Issue Category	Issue Characterization	Commenter
	0009-9: Route crosses through Aven Nelson phacelia ( <i>Phacelia anelsonii</i> ) populations in one location. “A pre-activity inventory should be conducted in areas of potential and known habitats, and the populations found or known clearly marked on the ground. Activities associated with tower construction or modification, line pulling and other potentially ground disturbing activities should be sited away from inventoried occupied sites whenever possible.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0009-15: “The EIS should identify and analyze impacts to all Unusual Plant Assemblages and riparian areas throughout the project area and these resources should be fully protected.”	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0010-6: Rare plant surveys must follow BLM protocol.	Fred Edwards, BLM, Scoping Meeting, 7/01/09
	0011-13: The following plant species may be found in or near the BCCE: <i>Penstemon bicolor</i> ssp <i>roseus</i> & <i>bicolor</i> , <i>Acacia greggii</i> , <i>Prosopis glandulosa</i> , and <i>Lotus argyraeus</i> var <i>multicaulis</i> (scrub lotus).	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
<i>Impacts on Wildlife</i>	0003-1: Concerned with potential for loss of bighorn sheep habitat due to installation of transmission line and upgrades or establishment of service roads.	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0003-2: Concerned with “inadvertent hazing of animals out of the area which is a bighorn movement corridor and potential lambing grounds.”	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0003-3: Project proponent should “time installation of the transmission lines to avoid the [bighorn sheep] lambing season, utilizing the warmer summer months when bighorn sheep will be tied to water sources north of the project area.”	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0003-7: “The [Banded Gila Monster] is State of Nevada Protected and a species of conservation priority to the Department as well as a BLM Sensitive Species.” Gila monster encounter protocols have been forwarded to E & E and are available online.	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0003-8: “...prior to handling any live [desert tortoise] individuals, authorization must be obtained from the [Nevada Department of Wildlife] in addition to any Federal requirements.”	D. Bradford Hardenbrook, Nevada Department of Wildlife, 8/13/09.
	0009-12: Impacts to Bighorn Sheep should be minimized. Project activities that cross the McCullough Range near critical watering guzzler should be conducted outside of periods where access is important. Also, construction should be timed so that it does not occur when sheep are crossing between ranges near the proposed telecommunications route Path 2 Section 1. The BLM and proponent should consult with the Nevada Department of Wildlife on how to best mitigate impacts on sheep, habitat, and lambing due to construction and helicopter use.	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
	0010-9: Will the project require a 2081 (California Incidental Take Permit)?	Becky Jones, CDFG, Scoping Meeting, 7/01/09.
	0011-10: The following reptile species may be found in or near the BCCE: <i>Gopherus agassizii</i> , <i>Heloderma suspectum</i> , <i>Sauromaulus obesus</i> , <i>Gambelia wislizenii</i> , <i>Crotaphytus insularis</i> , <i>Coleonyx variegatus</i> , <i>Phrynosoma platyrhinos</i> , <i>Dipsosaurus dorsalis</i> , <i>Crotalus mitchelli</i> , <i>Crotalus cerastes</i> , <i>Crotalus scutulatus</i> , <i>Rhinocheilus lecontei</i> , <i>Arizona elegans</i> ,	Lee Bice, Clark County Desert Conservation Program, 8/28/09.

**Table 2 Summary of all Comments Received, Organized by EIR/EIS Resource Area**

Issue Category	Issue Characterization	Commenter
	<i>Phyllorhynchus decurtatus</i> , and <i>Trimorphodon biscutatus</i>	
	0011-11: The following bee species may be found in or near the BCCE: <i>Perdita cracens</i> and <i>Perdita fallugia</i> .	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
	0011-12: The following bird species may be found in or near the BCCE: Phainopepla, LeConte's thrasher, crissal thrasher, gray vireo, loggerhead shrike, west-ern burrowing owl, cactus wren, and Scott's oriole.	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
	0011-14: The following mammal species may be found in or near the BCCE: kit fox, several varieties of bats, desert kangaroo rat, and desert pocket mouse.	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
<i>Mojave National Preserve Impacts</i>	0009-13: "All potential impacts to the [Mojave National Preserve] must be identified and fully considered."	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
<i>Desert Tortoise Critical Habitat Impacts</i>	0005-1: "Much of the BCCE meets the criteria for desert tortoise critical habitat, and should be analyzed as such in the biological and environmental analyses..."	Sue Wainscott, Clark County Desert Conservation Program, Scoping Meeting, 7/01/09.
	0007-1: "EIR/EIS must include a thorough and complete analysis of the project's effects on the Northeastern Mojave Desert Tortoise Recovery Unit and its associated eco-system, both in terms of direct and cumulative impacts."	Sidney Silliman, Sierra Club-San Gorgonio Chapter, 8/21/09.
	0007-2: "The project will impact the Piute-Eldorado Desert Wildlife Management Area (DWMA), critical habitat where the threatened desert tortoise is to be managed to achieve recovery by reducing eliminating human-caused impacts."	Sidney Silliman, Sierra Club-San Gorgonio Chapter, 8/21/09.
	0009-10: The Ivanpah Valley in California is the only location of a particular population of desert tortoise with a unique genotype. "All critical habitat and occupied desert tortoise habitat should be avoided..." In addition, the entire proposed route in Nevada falls within the Piute-Eldorado Desert Wildlife Management Area.	Lisa T. Belenky, Center for Biological Diversity, 8/20/09.
<i>Clark County Multiple Species Habitat Conservation Plan (MSHCP) / Boulder City Conservation Easement (BCCE)</i>	0001-1: The Eldorado substation is surrounded by the BCCE; therefore, the impacts of the project on the Clark County MSHCP mitigation areas, including the BCCE, must be included in the environmental assessment or the document will be deemed deficient.	Sue Wainscott, Clark County Desert Conservation Program, 6/12/09.
	0010-1: Advised CPUC/BLM to obtain a list of species covered under the MSHCP and their mitigation measures for with Boulder City.	Sue Wainscott, Clark County Desert Conservation Program, Scoping Meeting, 7/01/09.
	0011-3: "The application documents should indicate that the project as proposed will have an impact on our Habitat Conservation Plan via the impacts to ... the [BCCE]. ...Environmental Checklist Form (Appendix A) and the text of the document do not indicate or analyze these impacts."	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
	0011-5: "Chapter 8, page A-8, needs to have the HCP box checked as having some impacts."	Lee Bice, Clark County Desert Conservation Program, 8/28/09.

<b>Table 2 Summary of all Comments Received, Organized by EIR/EIS Resource Area</b>		
<b>Issue Category</b>	<b>Issue Characterization</b>	<b>Commenter</b>
	0011-7: “Road story maps 11-14 and 74-78 are of particular interest to the DCP. These maps are located in one of the highest biodiversity areas within the [BCCE]. This area contains greater cactus densities; impacts and restoration activities may be higher in this area.”	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
	0011-9: “Consider general project impacts and restoration activities, especially and pull and tension sites. The impacts and restoration will be greater in sandier areas and in southwestern portion of the [BCCE].”	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
<b>CULTURAL RESOURCES</b>		
<i>National Historic Preservation Act Compliance</i>	0006-11: BLM should ensure that its findings regarding properties eligible for listing in the National Register of Historic Properties are consistent with the SNSA EIS where the area of potential effect overlaps with the EITP EIS.	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
<b>ENVIRONMENTAL JUSTICE</b>		
<i>No comments.</i>		
<b>GEOLOGIC RESOURCES</b>		
	0010-10: Will the project require a 1600 (lakebed and stream alteration) permit?	Becky Jones, CDFG, Scoping Meeting, 7/01/09.
<b>GREENHOUSE GASES</b>		
<i>No comments.</i>		
<b>HAZARDOUS MATERIALS</b>		
	0010-3: Asked about the handling of the old poles—specifically where would they be disposed of and whether the existing roads would be able to handle the transportation of the waste materials.	Roddy Sheppard, Nevada Department of Wildlife, Scoping Meeting, 7/01/09.
<b>LANDS AND REALTY</b>		
<i>Boulder City Conservation Easement (BCCE)</i>	0005-2: “...if SCE seeks to go beyond the ROW within the BCCE, any proposed expansion of existing ROW or any additional ROW would be subordinate to the BCCE. [...] any extension in time or expansion of allowable uses or areas for those ROW as well as any additional ROW [are] incompatible with the BCCE.”	Sue Wainscott, Clark County Desert Conservation Program, 7/24/09.
	0005-4: Surface disturbances within the BCCE are restricted by Boulder City Ordinance #972, title 7, chapter 5 (7-5-8). “The City does reserve the right to issue permits for temporary surface disturbances, with the written concurrence of the County and the FWS.”	Sue Wainscott, Clark County Desert Conservation Program, 7/24/09.
	0011-1: “No expansion of the current [SCE ROW] in space or uses could currently be granted without amendment to the [BCCE].”	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
	0011-2: “No new [ROW] could currently be granted within the [BCCE] without amendment to the Easement.”	Lee Bice, Clark County Desert Conservation Program, 8/28/09.
	0011-6: Define boundaries of the BCCE and SCE ROW limits more explicitly and incorporate into Roger Overstreet’s road story maps. “Our staff and law enforcement personnel, who patrol the [BCCE] on a regular basis, will need to know what the limits of	Lee Bice, Clark County Desert Conservation Program, 8/28/09.

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	those ROWs are, prior to any ground disturbance within the [BCCE] area, so that we have a clear understanding of what activities are and are not allowable.”	
<i>Airport Environs Overlay District</i>	0006-2: Because SCE-proposed ROW passes through the southern part of the Airport Environs Overlay District, the “BLM must examine whether the EITP is consistent with [...] Public Law 107-282.”	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0006-3: The BLM must evaluate whether project is compliant with Clark County Comprehensive Plan, Vol.1, the Clark County Airport Environs Report (2007), and the South County Land Use Plan (2009).	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0006-4: “BLM should coordinate the terms of any relevant land use authorization with Clark County...” to prevent potential future airspace compatibility.	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
<i>Mojave National Preserve</i>	0010-14: Will the telecommunications route be within an existing ROW or require new ROW and will it be undergrounded or installed along existing poles in the Mojave National Preserve?	Larry Whalen, National Park Service, Scoping Meeting, 7/01/09.
<i>Additional Land Use Issues</i>	0010-4: A permit would be required for the I-15 crossing but crossing would be allowed in that location. Raised the issue of consulting the Nevada Department of Transportation and potential railroad crossings.	Dan Kupulsky, Caltrans, Scoping Meeting, 7/01/09.
	0011-8: “Table 3.1 needs to be updated to reflect the acres of private (City of Boulder City) lands and substation lands affected by the project and alternatives.”	Lee Bice, Clark County Desert Conservation Program, 08/28/09.
<b>TRAFFIC AND TRANSPORTATION</b>		
<i>No comments</i>		
<b>NOISE AND VIBRATION</b>		
<i>No comments</i>		
<b>RECREATION</b>		
<i>No comments.</i>		
<b>SAFETY</b>		
<i>Southern Nevada Supplemental Airport (SNSA)</i>	0006-5: “Because of the close proximity of the EITP to the proposed SNSA, [...] some of the elements of the EITP (specifically, transmission towers and lines) may constitute obstructions or hazards, or may create adverse impacts on the safe and efficient use of navigable airspace.”	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0006-6: “Part 77 of the Federal Aviation Regulations (Part 77) provides that any party proposing to construct an object or structure near a <i>proposed</i> public-use airport is required to notify the [FAA] before construction begins.”	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0006-7: “CCDOA strongly recommends that the project applicant file a FAA Form 7460-1 (Notice of Proposed Construction or Alteration) for each discrete structure proposed to be located near the SNSA in order to obtain a formal FAA determination for each structure.” FAA determinations will include “lighting and/or other mitigation requirements.” The EITP cannot be determined compatible with the SNSA until this process is complete; therefore, the applicant must submit these forms ASAP.	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.

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	0006-9: “FAA requires that structures near aviation facilities that are <i>obstructions</i> must be marked and/or lighted in accordance with FAA standards, and it is very likely that sections of the EITP near the SNSA will need to be lighted.”	Teresa R. Motley, AICP, Clark County Department of Aviation, 8/24/09.
	0010-13: Regarding navigational aids and airplane flight paths, will the project look at electromagnetic interference and sound abatement zones?	Dave Kessler, FAA, Scoping Meeting, 7/01/09.
<b>PUBLIC SERVICES</b>		
<i>No comments.</i>		
<b>UTILITIES</b>		
<i>No comments.</i>		
<b>SOCIAL AND ECONOMIC CONSIDERATIONS</b>		
<i>No comments.</i>		
<b>ENERGY USE</b>		
<i>No comments.</i>		

Given the results of comments received, the following areas are considered the most sensitive for analysis in the EIR/EIS:

- Alternatives;
- Cumulative Impacts;
- Purpose and Need;
- Regulatory Guidelines and Consistency;
- Biological Resources;
- Cultural Resources;
- Lands and Realty; and
- Safety.

## 4 NEXT STEPS IN THE EIR/EIS PROCESS

The scoping period is not the only time in which interested parties can comment on the environmental document. A similar process will begin when the draft environmental document is released. In addition to providing new comments on the draft EIR/EIS analysis at that time, the public will be able to comment on the adequacy of how their scoping comments have been addressed in the environmental document. Table 3 presents the proposed project schedule for the EIR/EIS and identifies where in the process that agencies and the public will have the opportunity to provide additional input into the environmental review process.

Event/Document		Purpose of Event/Document	Approximate Date
<b>Completed Events/Documents</b>			
Notice of Preparation		The NOP was published to notify interested parties of the BLM and the CPUC's intent to prepare an EIR/EIS.	July 23, 2009
Notice of Intent		The NOI was published to notify interested parties of the BLM and the CPUC's intent to prepare an EIR/EIS.	July 27, 2009
Scoping Meetings		One agency scoping and two public scoping meetings were held to allow for comment on the scope of the EIR/EIS.	July 1 – 29, 2009
Scoping Summary Report		The Scoping Summary Report documents agency and public comments received during the scoping period and summarizes environmental concerns identified.	September 30, 2009
<b>Upcoming Events/Documents</b>			
Alternatives Screening Report		The Alternatives Screening Report documents alternatives identified for further evaluation in the EIR/EIS and describes the process used to determine those that will be further evaluated.	October 30, 2009
Draft EIR/EIS	Release of Draft EIR/EIS	The Draft EIR/EIS discusses impacts and mitigation for the project and alternatives.	Spring, 2010
	Public Review Period	The public review period for the Draft EIR/EIS will be a minimum of 45 days.	Spring, 2010
	Draft EIR/EIS Public Meetings	Public Meetings will be held to give interested parties the opportunity to comment on the Draft EIR/EIS.	Spring, 2010
Final EIR/EIS	Release of Final EIR/EIS	The Final EIR/EIS, including response to comments, will be issued by the BLM and the CPUC and will be filed with the EPA.	Summer, 2010
	Decision on the Project	The BLM issues the Record of Decision and begins the 45-day appeal period. The CPUC certifies the EIR/EIS and issues a Proposed Decision.	Fall, 2010
* Specific EIR/EIS event/document dates and updates can be found on the project website: <a href="http://www.cpuc.ca.gov/Environment/info/ene/ivanpah/ivanpah.html">http://www.cpuc.ca.gov/Environment/info/ene/ivanpah/ivanpah.html</a>			