UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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JUN 17 2013

Ruben Sánchez
Bureau of Land Management/Renewable Energy Coordination Office
Arizona State Office
One North Central Avenue, Suite 800
Phoenix, AZ 85004-4427

Subject: Final Environmental Impact Statement for the Mojave County Wind Farm Project (CEQ #20130126)

Dear Mr. Sánchez:

The U.S. Environmental Protection Agency (EPA) has reviewed the May 2013 Final Environmental Impact Statement for the proposed Mohave County Wind Farm Project, Mohave County, Arizona. Our review and comments are provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft EIS and provided comments to the Bureau of Land Management on June 18, 2012. We rated the Draft EIS as *Environmental Concerns– Insufficient Information* (EC-2), due to the project's potential direct and indirect impacts to jurisdictional waters, air quality, biological resources, and tribal resources. Previously, on January 4, 2010, EPA provided formal scoping comments for the proposed project.

We appreciate the efforts of BLM, the applicant, and its consultants to address our DEIS comments. In particular, we note that the FEIS provides additional information regarding tribal consultation and impact assessments for biological resources; updates regarding development of an Eagle Conservation Plan, a Bat Conservation Plan and a Bird Conservation Strategy; clarification of the availability of water supply; and a demonstration of compliance with Executive Order 11988 Floodplain Management. We support the addition of BLM's preferred alternative -- Alternative E -- a combination of the DEIS's Alternatives A and B. According to the FEIS, this new alternative includes a no build zone and curtailment areas that will further mitigate the potential for impacts to golden eagles and reduce visual and noise effects on Lake Mead National Recreation Area and the nearby private property residences.

We were pleased to see, in the FEIS, documentation of the U.S. Army Corps of Engineers' acceptance of the preliminary jurisdictional delineation of waters of the U.S., and a reduced estimate of the acreage of potential impacts to such waters We understand that the applicant has

identified opportunities to further reduce impacts to waters through micrositing (e.g., decisions regarding turbine count and layout) and that the alternatives will be further analyzed during the 404 permit process to ensure that only the least environmentally damaging practicable alternative is authorized, as required under EPA's 404(b)(1) Guidelines (40 CFR Part 230). EPA will continue to review the proposed project through the Corps' 404 permit process to ensure compliance with the Guidelines. (Section 2.6.2, 2.6.3 and 2.6.4, Section 4.4.7).

We appreciate that additional mitigation measures have been incorporated to minimize air emissions. We note, however, that the FEIS includes revised personnel commute numbers that show an increase in the expected round trips from the previously estimated range of 23,400-54,600 to a range of 50,000-75,000. The document states that BP Wind Energy will be requesting construction personnel to use a ride sharing program (pps 4-99,100). EPA strongly supports this recommendation and encourages BLM to include this type of program as a mitigation measure in the final Transportation and Traffic Plan.

The FEIS provides information about valley fever and its association with disturbed soils and airbone dust. It states that, since the amount of dust resulting from the Project is expected to be minor, and implementation of the required BMPs would minimize dust generated during construction, the proposed activities are unlikely to increase the risk of valley fever over baseline conditions (p. 4-156). EPA supports the proposed mitigation measures and adaptive management strategies to suppress dust emission during construction. We are aware, however, that at least one other utility scale wind project has experienced substantial post construction airborne dust. Since a total of up to 111 miles of new interior roads are proposed for the Mohave County Wind Farm project, we recommend that dust emissions continue to be monitored throughout the lifetime of the Project and that appropriate BMPs and adaptive management measures be implemented whenever warranted to minimize the potential for airborne dust to be generated during Project operations.

We recommend that all mitigation measures identified in the FEIS be adopted in the ROD and included as conditions in construction contracts and any other approvals, as appropriate.

EPA appreciates the opportunity to review this FEIS. If you have any questions, please contact Kathleen Goforth, Manager of the Environmental Review Office, at 415-972-3521, or Anne Ardillo, the lead reviewer for this document, at 415-947-4257 or ardillo.anne@epa.gov

Sincerely,

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