

Appendix L

Response to Draft EIS Comments

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Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
American Wind Energy Assoc.	695-1913	Expanding the deployment of wind energy that the TWE Project and similar projects help tap and deliver to market will have significant and measurable benefits for the environment. For example, the currently installed wind energy base in the U.S. avoids nearly 100 million metric tons of carbon dioxide annually, equivalent to over 4 percent of power-sector carbon emissions, or taking 17.4 million cars off the road. Depending on the resource mix in a given area, wind energy can displace anywhere from 0.44 to 0.74 metric tons of carbon dioxide per megawatt hour. On average, wind energy avoids roughly 1,300 pounds of CO2 for every MWh of wind generation. This means a single turbine of average size will avoid over 3,000 metric tons of CO2 annually, equivalent to taking more than 500 cars off the road.	Your support for renewable energy transmission projects is noted. As described in Section 2.1.1 of the Draft EIS, no wind projects are considered to be connected actions to this transmission line; therefore the resource savings of the current or expanded wind energy base are outside the scope of analysis as a direct or indirect impact of this project. Section 5.3.1.2 of the Draft EIS (Cumulative impacts to Air Quality) discloses the GHG saving that would result in facilitation of the use of renewable energy resources.
Anadarko Petroleum Corp	571-1346	Within Wyoming, the Project encompasses significant portions of lands (surface and mineral) owned by either Anadarko, or one of its subsidiaries, and has potential to substantially affect ongoing operations and Anadarko's prospective development of oil and natural gas and other mineral resources such as coal and oil shale. The Project will impact both Anadarko's surface and mineral interests.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Due to the thousands of miles of alternatives, it is not feasible to analyze all of the claims and leases for validity or potential commerciality, or mitigate for all possible situations that may arise with regard to resource conflicts. It is also not possible for the BLM to dictate the terms and conditions in agreements between the applicant and mineral owners or lessees. The BLM will issue a ROW grant that is consistent with applicable regulations but recognizes that the applicant must acquire all access permissions in mixed ownership situations and it is expected that mineral rights conflicts would be resolved prior to construction. A major consideration with regard to perceived conflicts is that the DEIS analyzed 2-mile study corridors. The proposed transmission line, when constructed, will occupy a 250-foot wide ROW. The 250-foot wide ROW should facilitate resolution of many perceived conflicts. The terms and conditions of the ROW grant, as specified in 43 CFR Subpart 2801, includes "the right [of the BLM] to require common use of the right-of-way, and the right to authorize use of the right-of-way for compatible uses (including the subsurface and air space)." The BLM recognizes that subsurface activities (in this case, mineral extraction) may not in all cases be compatible with the intended ROW use but as stated above, potential conflicts must be resolved prior to construction. It also should be noted that although many unpatented mining claims have dubious validity, it is the responsibility of the ROW grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners.
Anadarko Petroleum Corp	571-1347	Anadarko also owns a large number of Federal oil and gas leases in the land grant strip that could be impacted by the future transmission line route. The final transmission line alignment and survey is necessary for Anadarko to fully assess the potential impacts the line will have on its surface estate. Therefore, the comments provided herein are general and applicable to all potential locations of the line, but Anadarko further reserves the right to provide additional comments once a final determination of the line location is made.	See response to Comment ID 571-1346.
Anadarko Petroleum Corp	571-1348	The Project appears to arbitrarily expand existing utility corridors in Region 1; thereby expanding impacts to the surface landowner. The utility corridors should not be expanded. The DEIS must evaluate the economic impact resulting from the loss of opportunity to develop private surface and fee minerals caused by the Project.	See response to Comment ID 571-1346. See Section 2.5 for an explanation and purpose for defining the corridors for the EIS. The actual construction corridors would typically be 250' or less in width (see Section 2.4.2 and Appendix E). Plan amendments are included as part of the Project in Chapter 4 of the EIS to expand and create utility corridors as desired by the BLM in consideration of this Project as well as other reasonably foreseeable projects. The width of these utility corridors proposed for amendment has been reduced in the Final EIS to reflect better available information on Project siting. Analysis of proposed amendments on other resource uses is disclosed in Chapter 4.
Anadarko Petroleum Corp	571-1349	Grants of right-of-ways ("ROW's") across BLM managed lands should correspond in time with execution of fee mineral and surface owner access agreements. Given the checkerboard nature of the area which the Project line may transverse, it is necessary not only to include in the project coordination with fee landowners uses and rights but also to plan the route based on access availability on fee lands. In addition, impacts to fee lands (environmental, social and economic) must be considered when authorizing ROWs.	See response to Comment ID 571-1346. Impacts to all lands, regardless of ownership or jurisdiction, have been considered and disclosed in the EIS.
Anadarko Petroleum Corp	571-1350	The Project and DEIS must discuss manner and process access will be obtained in all situations including the potential for eminent domain or utility condemnation of private property so that the public may have opportunity to comment on any proposed process or action.	Comment noted. As disclosed in Section 1.6 of the Draft EIS, Western, as a federal agency investing in the Project, would have the ability to acquire the rights needed under eminent domain laws prevailing in the affected states. However, Western has committed to working with citizens and landowners to address any concerns regarding acquisition of any private lands required for Project implementation, should it decide to participate. Western views effective public involvement and engagement as a much more productive route than exercising eminent domain authority.
Anadarko Petroleum Corp	571-1351	The Project and the DEIS must address protection against unauthorized use or traffic across private lands.	The Land Use, Recreation, Transportation and Access sections of the EIS identify the potential for the Proposed Action to expand the existing roadway network and identify potential effects on public and private lands that would occur from roadway use and construction. These discussions address the potential for incrementally increasing unauthorized access, describe related adverse effects and identify existing commitment, Best Management Practices and mitigation, as appropriate. Section 3.16.6 identifies a variety of existing commitments and Best Management Practices to keep traffic on the authorized roadway network. Section 3.14.6.1 and 3.14.6.2 identify proposed mitigation requiring coordination with landowners on placement of access roads and other surface structures. Section 3.14.6.2 will be augmented with additional mitigation regarding closure methods for access roads on private lands.

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Anadarko Petroleum Corp	571-1352	Access to Anadarko's mineral estate may be limited or precluded by disturbance/density caps associated with the Wyoming Core Area Policy and overarching regulations. Additive disturbance may be created by the Project reducing the ability to develop within the five percent surface disturbance cap within Sage-Grouse Core Areas, delineated in the Wyoming Core Area Policy. This disturbance would potentially then need to be reclaimed/mitigated for in advance of future project approvals. The DEIS must evaluate the economic impact resulting from the loss of opportunity to develop private surface and fee minerals caused by the Project.	Chapter 5 of the Final EIS was revised to include the latest cumulative impacts on the disturbance/density caps you reference. Potential economic impacts resulting from lost opportunity to develop private surface and fee minerals are speculative at this time as additional mineral development could occur without creating additional surface disturbance in these areas using directional drilling or other methods. Additionally, as noted in Chapter 5 of the Final EIS, the contribution of the Project to the cumulative disturbance is zero to very low because of the location of the transmission line within designated corridors.
Anadarko Petroleum Corp	571-1353	Anadarko has active mining leases and other mineral interests which should be analyzed in the DEIS. The proposed Project may affect Anadarko's subsurface interests. The DEIS must evaluate and discuss such impacts both under current operations and prospectively and take into consideration the legal rights afforded to the mineral interest holder under applicable laws, including but not limited to the General Mining Act of 1872, 30 U.S.C. §§ 22-42, the Mineral Leasing Act of 1920, 30 U.S.C. §§ 181 et. seq., and the Federal Land Policy and Management Act of 1976, 43 U.S.C. § 1744 et. seq.	See response to Comment ID 571-1346.
Anadarko Petroleum Corp	571-1354	Evaluation of mineral value affected should be made a condition of approval for the ROW, and considered in the National Environmental Policy Analysis (NEPA) review conducted by the BLM. The ROW must also include as a condition of approval assessment of all mineral resources and clearly state the "accounting of damages" should apply to all potentially recoverable minerals on Federal, state and fee mineral resources and not just current mine operators.	See response to Comment ID 571-1346.
Anadarko Petroleum Corp	571-1355	Resolution of private property mineral and access agreements should also be completed prior to authorizing BLM ROWs.	See response to Comment ID 571-1346.
Anadarko Petroleum Corp	571-1357	Given past development trends and rapid advances in mining technologies, as is evidenced by recent shale plays around the country, Anadarko believes that it is highly probable that many portions of its lands potentially affected by the Project could be accessed, within the life of the Project, for mineral development, especially coal, oil and natural gas. Placement of transmission lines over minerals has the potential to negatively impact their development.	See response to Comment ID 571-1346.
Anadarko Petroleum Corp	571-1358	The BLM should mandate shared infrastructure resulting in co-locating transmission lines on common towers/structures. This consideration should include combining the proposed Gateway South and TransWest Express Transmission Lines.	Project implementation using common tower structures with other projects was considered but eliminated from further detailed analyses. Section 2.7 of the Final EIS was revised to include the rationale for this elimination. Shared infrastructure other than tower structures has been considered to the extent practicable through colocation with existing facilities. This is discussed Section 2.2 and reflected in the resource sections of Chapter 3 of the Draft EIS.
Anadarko Petroleum Corp	571-1359	The DEIS should further evaluate cumulative impacts to the surface, if the Project parallels existing transmission line corridors across lands in the Checkerboard.	Chapter 5 of the Draft EIS analyzes the cumulative disturbance and resource impacts to surface resources from the Project and past, present, and reasonably foreseeable future actions.
Anadarko Petroleum Corp	571-1360	Construction of two parallel single-circuit lines will have a 25 to 30 percent increase of additional disturbance in comparison to single structure towers. Such additional disturbance should be avoided by using one, not two, lines.	Project implementation using common tower structures with other projects was considered but eliminated from further detailed analyses; Section 2.7 of the Final EIS was revised to include the rationale for this elimination.
Anadarko Petroleum Corp	571-1361	Private access to mineral right holds for trona, coal, oil and natural gas resources and other surface and mineral resources, must be maintained to the fullest extent practicable and in accordance with the law. The Project and its associated ROW should be subject to relocate transmission lines and towers and/or subside the surface, where requested by the mineral rights holder.	See response to Comment ID 571-1346.
Anadarko Petroleum Corp	571-1362	Grants of ROW's across BLM lands should correspond in time with execution of fee mineral and surface owner access agreements. ROW authorizations should not precede resolution of private property mineral and access agreements.	If approved, execution of the ROW grant for the TransWest would conform to all applicable BLM regulations regarding ROW grants and the required consideration of current valid existing rights.
Anadarko Petroleum Corp	571-1363	The Project should to the maximum extent possible and/or practicable utilize established energy corridors.	The range of alternatives developed by the lead agencies includes alternatives to maximize the use of designated utility corridors. They are discussed in Section 2.2 and disclosed in 3.16.6 of the Draft EIS.
Anadarko Petroleum Corp	571-1364	In the DEIS the BLM should address the manner and process access will be obtained in all situations including the potential for eminent domain or utility condemnation of private property so that the public may have opportunity to comment on any proposed process or action.	Comment noted. As disclosed in Section 1.6 of the Draft EIS, Western, as a federal agency investing in the Project, would have the ability to acquire the rights needed under eminent domain laws prevailing in the affected states. However, Western has committed to working with citizens and landowners to address any concerns regarding acquisition of any private lands required for Project implementation, should it decide to participate. Western views effective public involvement and engagement as a much more productive route than exercising eminent domain authority.
Anadarko Petroleum Corp	571-1365	The DEIS should evaluate and disclose the economic impact to Federal, state, and local taxes (ad valorem and severance) that results from loss of fee trona, coal, oil, and natural gas production due to the Project.	See response to Comment ID 571-1346. Text was added noting the potential for isolated conflicts with future mineral development. However, the likelihood and potential for such conflict are low and the effect small. None of the alignments pose conflicts with known recoverable trona resources. Oil and gas recovery can still occur in proximity to transmission lines.
Andrus, Brock	405-598	we had also had concerns with the power line if they put roads down there. We have some allotment here in Utah where we winter cattle. And as the population's grown, the roads have become better. We experienced quite a lot of vandalism. People shoot holes in our water troughs, cut holes in the fences and let the cattle out. So, if the access road was good, we were a little worried about that as well.	Discussion on potential increased access to grazing allotments has been added to the livestock grazing impact discussion.

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Bailey, Laura, Kevin, and Rex	406-734	We've got 120 acres you are supposedly supposed to be going over on, but there's a total of 600 acres, and we use all that for farm ground. We have fences up and grazing for cows, and in future years you can't do anything else with the ground. It's a major transmission line, and it effects our whole life, and there's nothing we can do. The property value will just be zero, and there's nothing, and that's my main concern is it's ruining our family tradition that we've had and livelihood of what's been happening on past years and future years. I know a power line is going to come. It's just a matter of being smart about where they are going to put it that will be the less impact on the community and us that are involved that have private property. And there's really no benefit as far as the county residents and the Nephi transmission. You're going all way through, and there's no benefit for the community itself.	Compensation for economic losses is provided for through negotiations, although not necessarily to the full satisfaction of either party. Quality of life and other considerations may factor into those negotiations. However, monetary values cannot be assigned to all impacts, nor are there assurances that either party will be fully satisfied with the outcome of the negotiations. Revisions to the text were included in Section 3.17.5.2 to identify the potential for dissatisfaction with the outcome of negotiations and limits on capturing quality of life values in ROW negotiations.
Bailey, Laura, Kevin, and Rex	406-735	We have four existing power lines on the property now, and during this same process basically we were told "Well, if you don't want to cooperate and agree with this, we'll just condemn your property and take it.	Comment noted. As disclosed in Section 1.6 of the Draft EIS, Western, as a federal agency investing in the Project, would have the ability to acquire the rights needed under eminent domain laws prevailing in the affected states. However, Western has committed to working with citizens and landowners to address any concerns regarding acquisition of any private lands required for Project implementation, should it decide to participate. Western views effective public involvement and engagement as a much more productive route than exercising eminent domain authority.
Baker, Bruce	102-4	The Executive Summary grossly overstates the potential energy delivered by the project by using irrational math and the maximum peak power capacity of the least likely alternative.	The information in the Executive Summary is correctly excerpted from Chapter 2 (and/or Appendix D, PDTR, which was supplied by TransWest and represents the Proposed Action).
Baker, Bruce	102-5	It misidentifies the energy destination as southern Nevada; while the terminus of this project is in southern Nevada, the energy destination is southern California	Chapter 1 and the Executive Summary of the Draft EIS correctly identify the terminus of the energy transmission proposed under this project as southern Nevada. This provides a logical terminus in that it allows for the power to be moved to a variety of locations within or beyond southern Nevada. The final destination of that power is speculative and may extend outside of southern Nevada and will vary based on market demand. Because this ultimate destination would not be influenced by the lead agencies' decision and is speculative, it is outside of the scope of this EIS. Appendix D acknowledges that the proposed ±600 kV DC transmission system could serve the needs of the broader region of Utah, Arizona, Nevada and Southern California.
Baker, Bruce	102-6	The proposed route and the preferred alternative are proximal to several historic trails including the old Spanish National Historic Trail. The potential for public experience of historic resources is highly dependent on setting. A remote, undeveloped viewshed contributes greatly to a quality setting and rewarding experience. Our ability to appreciate the effort and sacrifices made by our ancestors who used these historic trails to pioneer the west is forever diminished with every impact to the cultural resources and the general viewshed.	Section 3.15.4.4 contains an extensive analysis of potential impacts to the Old Spanish NHT resulting from the proposed project, which includes an analysis on changes to setting along the trail.
Baker, Bruce	102-7	If our Public land management agencies want to allow the use of Public land for energy transmission, they should develop a master plan for this development.	The January 2009 West-wide Energy Corridor (WWEC) Approved Resource Management Plan Amendments/Record of Decision for the Designation of Energy Corridors on BLM-administered lands in the 11 Western States is the "master plan" for energy development transmission in the TWE project area. Developed in response to Section 368 of the Energy Policy Act of 2005, the WWEC designated energy transport corridors on federal lands in eleven Western states to foster future projects to deliver electricity, oil, natural gas, and hydrogen to markets and users in the 11 western states and take into account the need for upgraded and new electricity transmission and distribution facilities to improve reliability, relieve congestion, and enhance the capability of the national grid to deliver electricity. The WWEC-designated energy corridors were considered in development of the Proposed Action and alternatives for the TWE project. Section 3.14 (Land Use) and the Land Use Summary of Impact tables in Chapter 2 of the Draft EIS disclose mileage within WWEC-designated corridors by alternative.
Baker, Catherine	191-701	We have documented via proven genealogies that more than 40 of the victims were Cherokee and we will expect protections under the Native American Graves Protection and Repatriation Act of 1990 (Novak 26). In telephone conversations with both the Cherokee Nations' Historic Preservation Officers in OK and NC, we learned that they cannot participate as consulting parties, because Utah is outside their legal jurisdiction.	In the case of NAGPRA, the BLM will comply with the NAGPRA regulations and will consult with the appropriate Indian tribes and lineal descendants. Proof of lineal descendancy may be required, depending on the circumstances of the discovery.
Baker, Catherine	191-703	Mountain Meadow is a National Historic Landmark (NHL) and listed on the National Register of Historic Places and covers the area where there will be construction. In addition, the "visual impact" on the NHL would be "irreversible and irretrievable" and not at all in line with the guidelines set down in the Section 106 process by the Advisory Council on Historic Preservation (Bureau of Land Management).	The NHL is located over 1 mile away from the closest alternative and any proposed ground disturbance. The other proposed alternatives are over 25 miles away from the NHL. Visual impacts to the Mountain Meadows National Historic Landmark have been addressed in detail in Section 3.12, Visual Resources.
Basin & Range Watch	199-250	The Transwest DEIS comment period needs to be extended an additional 60 days. There are so many conflicts over this route and the alternatives that we will need more time to work out the specifics over issues brought on by each alternative. In particular, there are issues with desert tortoise habitat and the Sunrise Mountain Wilderness Study Area that will need more time to work out.	The BLM determined that a 90-day comment period was sufficient for comment on the Draft EIS and declined to extend the comment period further. Please note that a 90-day comment period is double the required comment period required for EISs for site-specific projects and meets the requirements for comment periods for EISs analyzing land use plan amendments. These requirements are detailed in the Council of Environmental Quality Regulations for the Implementation of the National Environmental Policy Act (CEQ regulations), the BLM NEPA Handbook (H-1790-1), and the BLM Land Use Planning Handbook (H-1601-1).

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Battle Pass Scenic Byway Alliance, Inc.	379-579	In summary, the Draft EIS analysis FAILS to justify why BLM selected Alternative I-Dover Alternative I-A. This document must be revised to rightly choose Alternative I-A in the Final Environmental Impact Statement.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative will be provided in the Final EIS.
Battle Pass Scenic Byway Alliance, Inc.	424-623	The State of Wyoming Culture & Parks Department and Office of Tourism are trying to promote ways to and from the scenic byway, and that includes 789, because it's a pretty sparse, barren road.	Thank you for your comment reminding the agency about ongoing efforts to promote tourism visitation to/on the Battle Pass scenic byway across the crest of the Sierra Madre and Wyoming highway 789. None of the proposed transmission line corridors parallel the byway for any extended length, although Alternative I-C would cross over the byway near its western terminus in the town of Baggs. Impacts to scenic byways and backways are discussed in Section 3.12, Visual Resources, and Section 3.13, Recreation Resources. There were no changes in the analyses presented in this document in response to this comment.
Battle Pass Scenic Byway Alliance, Inc.	424-624	Looking at what was being proposed, our big concern is that the BLM plan does not address the economic impact. Tourism is the second biggest business in Wyoming, and it's promoted very strongly. It is something to do here, and it helps lots of little businesses. So in getting -- keeping our roadways as free and open as we can to encourage people to travel is very, very important.	Thank you for your concern regarding the role of roadways in promoting Wyoming tourism. The proposed project would involve very few crossings of public highways in the state, none of which is an interstate or major U.S. route (see Section 3.16). The FEIS was revised to note the establishment of the Battle Pass Scenic Byway.
Battle Pass Scenic Byway Alliance, Inc.	424-625	We worked very hard to keep viewsheds and keep the power lines out of where the traffic was so people would see pretty much the natural beauty, and that's what I think has to happen here, also.	Thank for your comment regarding local efforts devoted to influencing the location of power lines. Your comment has been carefully considered by the BLM but has not resulted in changes to the analyses presented in the FEIS. Impacts to scenic byways and backways are discussed in Section 3.12, Visual Resources, and Section 3.13, Recreation Resources.
Battle Pass Scenic Byway Alliance, Inc.	424-626	This particular scenic byway, you have to be scenic, and there's five other items. You have to have at least one of those to be a scenic byway. We have wildlife, natural history, historic history, geology, all of those things. We have all of them on this.	Thank you for your comment extolling the scenic and other characteristics of the Battle Pass Scenic Byway. Your comment has been carefully considered by the BLM but has not resulted in changes to the analyses presented in the FEIS. However, Section 3.13 (Recreation) was updated to acknowledge the state's formal designation of the Battle Pass Scenic Byway.
Bellah, Jerry	185-695	I'm very pleased to see that the Draft EIS was finally released in July 2013. It looks like you left no stone unturned and looked at every potential or possible environmental impact under the sun, and disclosed it in the document. Now is the time to act, and I ask that you please do everything you can to rapidly complete the environmental analysis and issue the Record of Decision and ROW grants so we can get to work.	Thank you for your comment.
Bellah, Jerry	185-699	You've been studying the TWE Project long enough, and the Draft EIS has enough environmental data to allow you to make the decision to move this project forward and get the Final EIS done quickly. We can't keep on waiting for the significant jobs that the BLM acknowledged would be created thanks to the TWE Project. Our industry is seeing a decline in our region so job creation is more important than ever. According to the Western Electricity Coordinating Council's 2012 "State of the Interconnection" report issued in July 2013, "the current year, 2012, experienced a significant decrease in the miles added to the (transmission) system compared to the previous five years. In 2012, the Western Interconnection added just over 600 miles of new transmission, an increase of less than 1 percent."	Thank you for your comment.
Big Mountain Campground and Ockey's Ranch	440-745	I would now like to refer to page c-117[2b] of your impact material. Roaded natural recreation. If this requirement is necessary on forest land, why would you crowd another line with unsightly towers into what was once the beautiful Salt Creek or Nephi Canyon area? Now it is overcrowded with towers, poles, and power lines wherever you look.	Roaded natural is not a requirement necessary on forest land; it is a land classification under the USFS Recreation Opportunity Spectrum, wherein moderate evidence of humans is allowed. It is preferable to concentrate transmission lines into one corridor that is already disturbed visually, rather than visually impact multiple areas with single lines, which disturbs a much larger area.
Big Mountain Campground and Ockey's Ranch	440-747	Why is there not an environmental impact study done for private land showing the effects upon the lives of people?	This analysis is presented in Section 3.17, Social and Economic Resources. Additional analysis of the potential impacts to private landowners can be found in Sections 3.1, Climate and Air Quality, Section 3.12, Visual Resources, Section 3.14, Land Use, and Section 3.18, Public Health and Safety.
BLM	165-1215	General, Section 3.12, Appendix I We appreciate the monumental analysis effort reflected in this draft and the improvements since the last draft to make it easier to read, follow and find references.	Thank you for your comment.
BLM	165-1216	Section 3.12.1.2, Page 3.12-1: VRM Classes do prescribe the amount of physical modification allowed to the character of the landscape as well as to what may be perceived (aka attention captured) by the "casual observer" (aka people in the area). The determination is a compound analysis. It is very important to recognize people/viewers role in the determination of meeting the visual objectives set in RMPs. According to H-8431, plan conformance is determined by conducting a contrast rating analysis to understand the extent of the physical change as "contrast" plus an assessment of how that contrast will attract attention of the public who would be exposed. Since this effort did consider 9 exposure factors and described them in section 3.12.6.1, it would be fair to make it clear here that both assessments were needed and performed. In that light, the description of each of the VRM Classes written in the paragraph will need to include the allowable levels of attention captured...which they do in the Table 3.12-1. Possibly a solution would be to drop the definition provided in the text and refer to the table?	The FEIS has been changed to append the clarification into the paragraph about VRM Classes.

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BLM	165-1217	Section 3.12.2.1, Page 3.12-2: The scale of VRIs are not necessarily appropriate for assessing specific projects...so part of the analysis for a project would be to conduct a "site analysis" where agency VRI provide the initial information but then, more specific information is developed for the project site to understand the existing condition of landscape characteristics, visually sensitive stakeholders and the way interaction occurs (direct or indirect/symbolic means). This was done by Merlyn Paulson and it would be appropriate to explain the relationship of data sources that exist and were pulled in with additional information developed in order to assess environmental impacts of this Project.	Field investigation's integration with the VRIs, site-specific landscape scenery for non-BLM lands, and desktop analyses has been clarified in Section 3.12.2.1.
BLM	165-1218	Section 3.12.2.1, Page 3.12-3: The BLM 8410-1 handbook defines the VRI Class in Section V(A)(1) as: "Inventory classes are informational in nature and provide a basis for considering visual values in the RMP process." What we gain from the VRI class is the concept that "scenic value" is the integration and interplay of the three inventory factors at any one place—the landscape characteristics, the people and how the interaction occurs between them equals scenic value. The agency VRI recognizes the three factors but at a scale that is most appropriate for a high-level and broad understanding of what exists. The VRI Class itself loses explanatory detail of the underlying factors during the synthesis but the index created provides a quick way to initially take in the three components at the same time which helps when considering large amounts of acreage & many resources. Be careful not to give that index more credit than it can afford to provide as a stand-in to describe "scenic value" of the affected environment at a level to assess effects caused by this Project.	Comment noted. The text has been reviewed to ensure it is careful not to give VRI class more credit than it can afford as a stand-in for scenic value.
BLM	165-1219	Section 3.12.2.2, Page 3.12-3: Do you mean VRM Class objectives are established during the RMP land use planning process? Not all of BLM's LUPs "result" in VRM Class assignments. Some FO have elected to not set them, which is not of course recommended.	Comment noted. However, all plans affected by this project have established VRM Class objectives during the RMP land use planning process.
BLM	165-1220	Section 3.12.2.2, Page 3.12-4: When BLM management selects a VRM class objective to assign to an area, are we sure we want to say that the decision only considers the VRI and the value of visual resources? This is a point that was commented on in the previous draft. I will copy that comment here for convenience: 'Additional policy that applies and more clearly outlines what is to be considered to develop VRM classes comes from FLPMA, 43 U.S.C. 1701 Sec. 202(c)(1-9). This is highlighted in BLM Manual 1601 .03A(4). Particularly applicable is this text: "...in developing land use plans, the BLM shall use...the inventory of the public lands; consider present and potential uses of the public lands, consider the scarcity of the values involved and the availability of alternative means and sites for realizing those values; weigh long-term benefits to the public against short term benefits.' Please see BLM H-1601-1, Appendix C, pg. 11. VRM classes are to be selected in balance with management consideration of the VRI, other resources and land use priorities.	The section has been appended with the suggested paragraph and intent of BLM H-1601.
BLM	165-1221	Section 3.12.4, Page 3.12-5: This first sentence suggests that Physiographic Provinces include human/cultural interest which they do not by their definition. Consider rewording this to reflect that this study organized information within the analysis area by the physiographic boundaries, then identified within those boundaries, places of human and cultural interest. Would it be clearer to say something like this: "The analysis area was first broken into Physiographic Provinces (Fenneman 1931), then within each Physiographic Province the study identified significant and well-known natural features, cultural elements and other locations of significance to people and are shown on a map in in Appendix I, Figure I-9."	The section has been updated to reflect the text provided in the comment.
BLM	165-1222	Section 3.12.4.1, Page 3.12-5: With regard to categorizing developed vs. natural landscapes, were elements of density, size and scale of existing modifications part of the criteria? Was this done from the ground perspective of a viewer or based on themes in GIS? We need to be careful of generalizing too much and making too broad of assumptions. Agricultural fields, although a human modification, may be considered by the general public to be "natural" in comparison to a residential development. Many pipeline ROWs that are buried and once revegetated tend to go undetected and preserve the "natural" look and feel of the landscape to the general public. Roads and trails, such as OHV trails could read on the landscape as "developed".	Yes, elements of density, size and scale of existing modifications were included both from the ground perspective and based on themes in GIS. All of the project's alternatives were investigated on-site by the visual resources analyst and organized as themes in GIS. Agricultural fields (crops, not pastures) are considered developed. Pipeline ROWs are typically revegetated as linear grass corridors in shrub and tree environments, and roads and trails were designated as to their surrounding landscape.
BLM	165-1223	Figure 3.12-1 to 4 Very readable and informative maps. Thank you for including.	Thank you for your comment.
BLM	165-1224	Section 3.12-5, Page 3.12-10: Regarding the statement "A region's landscape character creates a "Sense of Place," and describes the visual image of an area." Since landscape character is not the only factor that creates a "Sense of Place" but it is a significant factor, it may be more accurate to state this differently. Possibly something like this... "The landscape characteristics of a region often add significantly to individual and community "Sense of Place" by providing a memorable and identifiable image."	The section has been updated to reflect the text provided in the comment.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM	165-1225	Section 3.12-5, Page 3.12-10: Physiographic provinces do describe patterns of landform, vegetation, and water which influence human settlement patterns and cultural features, but this sentence implies that cultural features are defined by, rather than influence by physiographic provinces.	The section has been updated to address this concern.
BLM	165-1226	Section 3.12-6, Page 3.12-12: Would it be more correct to label this section "Scoping of Visual Issues and Concerns"? The current label sounds like this section contains results of the analysis.	Based on direction from the BLM, this section has been relabeled, "Issues, Considerations and Impacts Methodology for Visual Resources." Public scoping items were limited.
BLM	165-1227	<p>Section 3.12.6, Page 3.12-12: Would it be more correct to label this section "Scoping of Visual Issues and Concerns"? The current label sounds like this section contains results of the analysis.</p> <p>Regarding Compliance VS Impacts Regarding the general content of this section, the topic of "compliance" needs to be separated here and throughout the write-up of effects. Compliance is not an "issue" in the sense of NEPA (environmental effect). Compliance with existing LUP is a legal requirement required by FLPMA. The BLM and USFS are unable to authorize any action that does not conform with the existing land use plans. That is why it is the first step taken when a proposal is made. It is an administrative "issue", in a sense, but it is not an environmental "issue" as defined by NEPA.</p> <p>A notable difference between the assessment of plan conformance and the assessment of environmental effects is that the determination of plan conformance is performed against an administrative baseline, VRM Classes (a decision about how the resource is to be managed). The identification and assessment of effects (aka impacts) is to be made against existing conditions...the "affected environment". Determining plan conformance is necessary to go forward with processing a proposal and is therefore included in the EA or EIS. However, to AVOID CONFUSION that the determination for plan conformance IS also the analysis of environmental effect, it needs to be clearly described and reported separately from the affected environment and environmental effects sections (see H-1790-1, 1.5; also see 43 CFR 1601.0-5(b)). The approach to determine conformance with VRM Class objectives established in RMPs is clearly described in H-8431. The approach to identify and assess environmental effects to scenic values is not specifically provided. The VRM program policy does not provide specific NEPA guidance but defers to agency policy & guidance in H 1790-1. See H-1790-1, Chapter 6. According to agency NEPA planners, the determination of conformance (or non-conformance) is typically part of Chapter 2 after the alternatives are presented. Mitigations associated with VRM Class conformance and bringing a non-conforming project into conformance must also be made clear from mitigations recommended to reduce impact to scenic value.</p> <p>The references and handling of VRM Class conformance as part of the environmental effects sections of this draft are a shortcoming and will need to be corrected throughout the draft.</p>	<p>The process and results of the analysis are consistent with direction from the BLM and USFS Project leads. The Visual Resource analysis provides an assessment of environmental impacts as well as compliance with land use plans. Areas of identified non-conformance for visual resources, as well as other resources, are then considered in depth in Chapter 4 as any proposed land use plan amendments resulting from the analysis in Chapter 3.</p>
BLM	165-1228	Section 3.12.6, Page 3.12-12: Where are the visual issues and concerns listed that had been identified during scoping? Could they be listed or referenced here?EISs are to provide thorough yet focused analysis of issues and concerns about consequences to the environment—and in the case of "scenic values", to the human environment. The purpose of an EIS is to provide government decision makers information prior to a decision so they may make well-informed decisions that best protect, restore, and enhance the environment. Issues and concerns raised internally and externally to the BLM define the extent of what needs to be studied for each program or resource (See H-1790-1, Chapter 6). This step in the NEPA process is fundamental.What are the issues & concerns about scenic values related to this proposal and its alternatives? Who has the issue or concern? What is the basis of the issues or concerns?The absence of articulating scoping issues & concerns is a significant deficiency of this draft.	Public scoping comments as they relate to visual resources were limited. The applicable public scoping comment is presented in Section 3.12-6, first paragraph.
BLM	165-1229	Section 3.12.6, Page 3.12-12: There are several places in this section where the word "impact" was used when it would be more correct to say "issue" or "noticeable change." There is a difference between change and impact as meant in NEPA analysis. A Physical change does not always equal impact. Please review the use of the term "impact" and correct throughout the visual sections of the draft.	Text has been added to imply a noticeable change in place of impacts, where applicable.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM	165-1230	<p>Section 3.12.6, Page 3.12-16: In reference to the top paragraph. Thank you for stating assumptions regarding impacts clearly. With the understanding that FLPMA has charged the BLM to manage “scenic values” and according to NEPA, “scenic values” are most appropriately a part of the “human environment”, the assumption made that disturbance to people’s views would affect the human environment is understandable but the assumption that physical alterations made, in and of themselves, would cause impact to the human environment is not as understandable.</p> <p>Based on the way “scenic landscapes” are defined in this study, they are a record of the form, line, color or texture of landforms, vegetation mixes and existing structures within the study area. What in that definition links this factor to the issues or concerns raised that could affect the human environment? How would a change to the form, line, color and texture of the landscapes affect the human environment (the way people live, work, play or otherwise engage and interact within a place)? The link appears to be missing.</p> <p>The results of the analysis of “impacts to the scenic landscapes” are simply the results from the visual contrast rating analysis which describes how the Project would alter specific aspects of the landscape character. How is that impact to the human environment? Merlyn had to do this work to determine plan conformance and, per BLM request, has included the results of the contrast rating analysis in Appendix I because they are valuable to the BLM to understand how the Project will alter the SQ inventory factor throughout the analysis area. However, for the evaluation of environmental effects, without also considering who would be visually sensitive to a change in landscape character and how their scenic value would be affected by a change, the record of change to the physical landscape characteristics or traits falls flat in meaning.</p> <p>For example the public may, through living, working or playing; acquire and hold scenic values that contribute significantly to their quality of life, economic livelihood, value of their home or workplace, or the places in which they recreate or to which they travel. All of this occurs irrespective of the SQ rating. The assumption that the rating system of “A”, “B”, and “C” are reflective of scenic value held by people for a specific place is a stretch. A community may value the big open views of rolling sage-brush plain and visually identify that landscape with their “sense of place” but that landscape would likely rate out as a “C” landscape with “low visual value” and on that basis alone, any visual alteration to the “C” landscape would be considered to cause “low impact”. Did that “C” landscape rating adequately represent the actual public’s “scenic value” of that specific landscape? Likely not. How does this study then reconcile the discrepancy between actual scenic values held by people with ratings based on qualities of classic design exhibited by a landscape?</p> <p>The topic “Impacts to People” already appears to look at how the Project would affect scenic values and alter the human environment because it includes land, people and exposures. Could the topics be merged?</p>	<p>Adjustments have been made to the section. Absent community surveys about the personal value individuals hold for landscape in their neighborhood, the standard BLM and Forest Service scenic quality factors are in effect. This study is unable to merge the topics of impacts to people and impacts to scenery, due to the inherent divisions in the BLM and Forest Service visual systems.</p>
BLM	165-1231	<p>Table 3.12-3, Page 3.12-16: Thank you clearly identifying “impacts to X” from “Compliance”. This is now clearer than in the previous draft. As mentioned in an earlier comment, compliance needs to be put into its own section and not be included in the environmental effects sections.</p>	<p>The process and results of the impacts and compliance analysis are based on direction from the BLM and USFS Project leads.</p>
BLM	165-1232	<p>Section 3.12.6, Page 3.12-16: Regarding the first of the three bullets at the bottom of the page, please explain how “visually important landscapes” are identified. Are they identified through scoping? Are they assumed important based on SQ rating?Regarding the last bullet in this list. Compliance would not indicate “significant impact”. Change that is not found to be compliant with VRM Classes set in RMPs need to be identified and addressed. The only way to address them would be to 1) alter the proposal (aka alter the POD design or prescribe mitigation measures), 2) alter the RMP VRM Class, or 3) deny the action. RMP Compliance is assessed by following the guidance in H 8431. Compliance is NOT an impact to the human environment. It is management concern. The Project may be in compliance with the LUP and the alterations may be in allowable limits, yet the Project, due to its specific components and design, could still cause impact to the human environment.It would be erroneous and a serious deficiency of this analysis to categorize situations of non-compliance as impacts to the human environment. Please correct throughout.</p>	<p>The Final EIS has been edited to reflect this comment. The process and results in the section are consistent with direction from the BLM and USFS.</p>
BLM	165-1233	<p>Section 3.12.6.1, Page 3.12-17: The first sentence under “Impact Parameters” is confusing. Could it be stated this way: “Impacts were assessed based on an analysis of contrast caused by the Project, visually sensitive stakeholders and places considered visually significant, and how the visually sensitive stakeholders would experience the Project.” Again, compliance is included here but is not a parameter to assess impact to the human environment.</p>	<p>The text has been edited to reflect the comment.</p>

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Commenter Name	Comment ID	Extracted Comment	Response
BLM	165-1234	Section 3.12.6.1, Page 3.12-17: Regarding the paragraph introducing the 9 "criteria for determining visual contrasts". 1) These criteria are not meant to determine visual contrast as stated. They are to assess ways people will be exposed and the attention that the change will capture. 2) Why are criteria #8 & 9 included? They seem most aligned to the identification of visually sensitive publics more than as exposure factors.	The text has been edited to reflect the comment.
BLM	165-1235	Section 3.12.6.3, Page 3.12-27: How are these impacting the human environment? Are they altering the way segments of the public will live, work, play or otherwise interact?	The text has been edited to reflect the comment.
BLM	165-1236	Section 3.12.6.3, Page 3.12-28: Regarding the subtopic "Mitigation". Mitigation measures that are being prescribed to bring a non-conforming project into conformance need to be clearly identified separately from mitigations that are to reduce impact. See previous comments about making "conformance" its own section and include mitigations there as appropriate.	The process and results for the section are based on direction from the BLM and USFS Project leads.
BLM	382-580	I've done a review of the document, and have comments as follows: In Volume III on page 3.13-91 and 92. Under the heading "Alternative Ground Electrode Systems in Region III" This paragraph states that the Meadow Valley II alternative would have the greatest impact on dispersed recreation opportunities because of the distance from the corridor compared to the other alternatives that have shorter transmission line lengths and smaller footprints. This is not correct. Most recreation use in this area is motorized trail use. The transmission line length doesn't affect recreation as much as the acreage to be fenced around each Ground Electrode System. Dispersed use numbers are much greater in the Mormon Mesa area than that in the Meadow Valley II area. Therefore, the greatest impact would be from the sites on or near Mormon Mesa. Use estimates in the areas listed above are based on staff observation.	Text was revised in Section 3.13.6.11 to state the Mormon Mesa-Carp Elgin Road (Alternative III-B) and Halfway Wash East (Alternative III-A) would have the greatest impacts because they have the largest permanent footprints in a popular dispersed recreation area.
BLM	609-863	Alternative C for Transwest Express has a number of cultural resource conflicts in the eastern parts of Sevier county and western parts of Emery County. Alternative C crosses the Quitchupah Creek drainage in western Emery County. While no ethnographic work has been done in this part of the drainage, the Southern Paiute view this drainage, including portions beyond those studied in Sevier County, as important both culturally and spiritually.	Comment noted. Tribal consultation between the BLM, Western, and the Southern Paiute currently is ongoing. As of this date, no locations of tribal concern have been identified by the Southern Paiute through the consultation process.
BLM	609-864	Further up the drainage, in Sevier County, the RFO has recognized the creek in its RMP and Quitchupah Creek Road EIS as a place of significant cultural value both for archaeological sites and its importance to the Southern Paiute people. The cultural concerns in the Sevier County portion of Quitchupah Creek are some of the main reasons an alternative outside the Quitchupah Creek Canyon was selected in the Quitchupah Creek Road EIS. If Alternative C is taken into further consideration, an ethnographic study with the Southern Paiute will almost certainly be requested and needed. If the ethnographic study or consultation reveals Southern Paiute cultural concerns with the area, these concerns might be difficult or even impossible to mitigate.	Comment noted. Tribal consultation between the BLM, Western, and Southern Paiute currently is ongoing. At this time, the Southern Paiute have not requested an ethnographic study nor have they identified any specific locations or properties of tribal concern.
BLM	609-865	Alternative C also crosses the Saleratus Benches in the eastern part of Sevier County and runs along Denmark Wash in western Sevier County. Both of these locations contain some of the most dense locales for National Register eligible archaeological sites in Sevier County. Alternative C will not only destroy these important sites, but may prove costly because of the amount of data recovery that will be necessary in these locations. The transmission line access roads could also contribute to indirect impacts to those sites by increasing access to the areas.	Comment noted. As stated in Section 3.11.6.2, an intensive Class III inventory would be conducted after the final route is selected by the BLM and Western. The inventory would be conducted with enough lead time to allow for NRHP evaluations, impacts assessments, and resolution of adverse effects. Avoidance would be the preferred method of "mitigation," and can be achieved by locating the transmission line foundations away from eligible sites or by spanning the eligible sites. Avoidance by either of these methods would greatly reduce data recovery costs.
BLM	609-866	Finally, Alternative C also crosses designated portions of the Old Spanish Trail (OST) corridor in western Emery County and eastern Sevier County. The viewshed in this section of the OST remains largely unchanged from its historic context. Only Highway 10 in Sevier County alters the visual landscape from what travelers along the trail would have seen during the trail's period of use. If Alternative C is selected, some sort of mitigation would likely be needed to mitigate the effects of the line and the towers in this area.	The Programmatic Agreement developed for this project includes an appendix that defines procedures to identify and evaluate effects to historic properties for which setting, feeling, and association are aspects of integrity. Any minimization or mitigation measures necessary to address adverse effects identified through that analysis will be included in historic properties treatment plans developed specific to each state. This detailed analysis of historic properties' setting and associated treatment plans will be completed only for the final route selected by the agencies, concurrent with the Class III field inventory.
BLM - Caliente Field Office	699-1786	The Panaca Summit Archaeological District is a listed property not just an eligible property and it should be listed with all of the other Listed National Register Sites and Archaeological Districts.	All references to the Panaca Summit Archaeological District as a listed site have been revised per the comment.
BLM - Caliente Field Office	699-1788	Executive Summary: None or one plan amendment would be required. The BLM Caliente (Nevada) FO plan may be affected. This is misleading see amendments section.	The executive summary is only intended to provide a snapshot of the information presented in the document and more detail is provided in the plan amendment chapter. However, the statement is true in that depending on the alternative selected, either none or one plan amendment is proposed in the Caliente FO.
BLM - Caliente Field Office	699-1789	ES 3.15 Special Designation Areas Within Region III, Fourth paragraph, Correct portion to portions	Text edited as requested.
BLM - Caliente Field Office	699-1791	Social_and_Econ Table 3.17-3 Selected Social Characteristics Change column Two spelling FROM Number of Resident TO Number of Residents	Text edited as requested.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM - Caliente Field Office	699-1792	4.0 Federal Agency Land Use Plan Amendments: Change LAST sentence of Page 4-5 FROM Maps depicting with the required plan amendments TO Maps depicting the required plan amendments.	The suggested change has been made to the text.
BLM - Caliente Field Office	699-1793	Amendments P4-44: For P4-44 the last section of 4.4.13 could be clarified. Suggest this section be changed as follows: For Alternative C, Map 23 and Table 26 (p. 115 and 119) associated with RMP decision SD-3 would be amended as follows for 9 miles (new text in bold italics, including a new footnote #15): Table 26 (Excerpt from EYDO RMP) Management Prescriptions for ACECs Kane Springs (57,190 acres) Management Activities Management Prescriptions Land Use Authorization Limited9/avoidance2/exclusion area 1515 A one-time exception is granted to accommodate one high-voltage transmission line through the ROW exclusion area adjacent to U.S. Highway 931	An amendment is no longer needed for this area based on the updated preliminary engineered alignment and associated refined transmission line corridor received from the Applicant for the Final EIS.
BLM - Caliente Field Office	699-1794	CH 4 Amendments P 4-63 Change FROM The 9 miles of utility corridor that would require a plan amendment would cross or overlap with intermittent streams and various waterbodies. The amended area would overlap with one mile intermittent streams. TO The 9 miles of utility corridor that would require a plan amendment would cross or overlap with intermittent streams and various waterbodies. The amended area would overlap within one mile of intermittent streams.	An amendment is no longer needed for this area based on the updated preliminary engineered alignment and associated refined transmission line corridor received from the Applicant for the Final EIS.
BLM - Caliente Field Office	699-1795	Page 4-94 And Table 5-30: Alternative C will require the most EYDO work for ESA and plan amendment. Especially with Kane Springs and Desert tortoise Gopherus agassizii Page 4-94: Impacts to reptiles (e.g., desert tortoise, banded gila monster) and raptors would be more pronounced within this FO due to available habitat, and sensitivity to disturbance. This proposed plan amendment alternative would cross 276 acres of critical habitat and 3 acres of potential habitat for desert tortoise. Also see Table 5-30 Region III: SDAs Within Shared 2-mile Transmission Line Corridor forth same point.	An amendment is no longer needed for this area based on the updated preliminary engineered alignment and associated refined transmission line corridor received from the Applicant for the Final EIS.
BLM - Caliente Field Office	699-1796	Nevada State Office: The Sunrise Instant Study Area needs to be released by congress prior to any new land use authorizations can be issued within this area.	Section 3.15.4.6 of the Draft EIS (page 3-87 et al.) indicated use of a future corridor through the Sunrise ISA would be contingent upon Congressional action releasing the ISA from further wilderness consideration. This text was updated to indicate that the 2014 Consolidated Appropriations Act (2014 Act) H.R. 3547-309, Sec. 115 (a) released the Sunrise Mountain Instant Study Area (ISA) from further wilderness consideration and study and the area is to be managed in accordance with the adopted land management plan (i.e., as part of the Rainbow Garden ACEC). As such, the Sunrise ISA has been removed from the special designations areas analyzed in Section 3.15 but the Rainbow Garden ACEC remains.
BLM - Colorado State Office	699-1787	The ACECs in the Ely district are not PROPOSED, they are ACECs as identified in the Ely District RMP.	Section 3.15 of the Draft EIS does not refer to any Ely District ACECs as being proposed but not designated.
BLM - Colorado State Office	700-1741	Executive Summary, 2nd Paragraph: The first portion of the paragraph states that impacts would occur, but only within the context of physical change and contrasts. But change and contrast in and of themselves must not be misconstrued as impacts to the human environment (NEPA's focus). The sentence beginning "Direct impacts to people and scenery would be expected to be high and contrasts would comply with BLM Visual Resource Management (VRM) Class IV management objectives," hints at clarification—noting that while impacts are expected to be moderate to high, contrasts would nonetheless comply with VRM Class IV objectives. In this strategically important introductory paragraph, please consider making the important distinction between impacts to the human environment (existing baseline conditions) and conformance with BLM's VRM Class objectives (administrative baseline) more transparent. Thank you!	The section has been edited as follows: Second paragraph, first sentence changed to: Visual resources impacts to the human environment would occur during the construction phase of the Project and would be caused by the effects of vegetation clearing within the ROW and ground disturbance for access roads, transmission line, terminal, and electrode bed construction. Second paragraph, third sentence changed to: In undeveloped areas, transmission line elements would contrast with existing characteristic landscapes to a moderate to strong degree and impacts to the human environment would be moderate to high. Second paragraph, fifth sentence changed to: In all cases, construction and operation activities occurring in the immediate foreground of the observer would causes greater impacts than those appearing at a further distance. Second paragraph, a six sentence added as follows: Impacts to the human environment are considered independently from conformance with BLM Visual Resource Management (VRM) Class Objectives, or consistency with USFS Visual Quality Objectives (VQO) or Scenic Integrity Objectives (SIO).
BLM - Colorado State Office	700-1742	Appendix I, Visual Resource Inventory Classifications: VRI classes are not defined in BLM's 8400 policy manual. Its 8410 inventory manual states that they are only "informational in nature and provide the basis for considering visual values." The first sentence of this section goes further, stating that VRI classes "represent the relative value of the visual resources and provide the basis for conserving visual values..." Please consider the need to 1) strike "conserve" and replace it with "consider," and 2) then relate that consideration to the second sentence of the draft which explains those values to be considered are the inventoried scenic quality, visual sensitivity, and distance zone classifications of existing conditions.	The appendix has been changed to reflect the comment.
BLM - Colorado State Office	700-1744	Appendix I, Compliance with Agency Management Objectives: The second sentence of the first paragraph is incorrect, stating "The recent visual resource inventories have not yet been included in the current BLM RMPs." VRIs are never included in any RMPs but are instead used to inform the selection of VRM Class objectives in RMPs. Please correct.	The appendix has been edited to reflect the comment.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM - Colorado State Office	700-1745	<p>Appendix I, Residual Landscape Scenery Impacts and Residual Sensitive Viewers Impacts: The first of these sections states that “Landscape scenery impacts were determined based on the comparison of contrasts with the scenic quality inventory of the affected environment.” The second section states that “Sensitive viewers’ impacts were determined based on the comparison of contrasts with sensitivity/user concern levels, distance zones..., and visibility of the Project.” Because a) NEPA requires assessing environmental effects to the human environment, and b) inventoried VRI components describe the three components of that affected environment, these two narrative sections suggest that the draft hasn’t yet integrated project effects to both elements of the affected human environment—concerned publics and the landscapes, features and views that concern them:</p> <p>1st: Change itself as measured by degree of contrast must not of itself be considered as impacts to the human environment unless it can be shown that this change adversely (or beneficially) affects identified visually sensitive and/or concerned publics.</p> <p>2nd: The second section referenced above appears to more directly get at effects to the human environment because it relates the project landscape contrast to both identified viewer sensitivities and project visibility/distance zones—it appears that all three have been integrated in this second analysis. IOW, you’ve already done the integration in this section.</p> <p>What then is gained by representing the first section (“Residual Landscape Scenery Impacts”) as if it were an altogether separate analysis of impacts? If we allow ourselves to be tripped up by the 8431 manual’s use of the word “impact” (“tripped up” because that word is clearly used there in reference to “having an effect on”--Webster’s) and not in the NEPA sense of effects to the human environment brought about by landscape alterations as. Besides, change in and of itself could only equal impact if affected publics could reasonably expect that BLM public lands were to be preserved (as in NPS’ parklands charter).</p> <p>Please therefore consider integrating text that follows the first section header within the text which follows the second—and changing section titles accordingly. This appears to be a significant deficiency in the draft. Correcting it would:</p> <p>#1) demonstrate how the analysis integratedly addresses the affected human environment, and #2) avoid assigning impacts to changes irrespective of their effects on that human environment. Thank you very much!</p>	The appendix text has been edited to reflect your comment.
BLM - Colorado State Office	700-1746	<p>Appendix I, Table 1-5 Visual Resource Inventory Classes Affected by the Project: Because changes to inventoried VRI classes are merely the manualized result (using the classification table) of changes to VRI components (and therefore less definitive), would it be feasible to instead or in addition show what actually changed: scenic quality, visual sensitivity, or distance zones?</p>	Table I-5 discloses the VRI Class (Class II, III, or IV) crossed by the Project and the extent of the crossing. It is not intended to show possible changes to the inventoried VRI classes. Such changes would be based on the results of user sensitivity/user concern surveys of publics with interests in those landscapes and associated distance zones based on their locations in each landscape. It is possible to estimate changes to the scenic quality ratings based on inventory criteria and those are included in the previous section.
BLM - Colorado State Office	700-1747	<p>Appendix I, Table 1-10 Visual Contrast Criteria and Impact Factors: This table illustrates the degree to which the first section referred to in comment #4 above overlaps the second. How can the listed factors be considered as “Impact Factors” if they do not serve as an index of landscape alteration and therefore impacts to visually concerned publics sensitive to those changes? Columns 3 “View Distance,” 4 “View Duration,” 5 “Angle of Duration,” 6 “Light Condition, and 9 “Relative Scale” all pertain to either relative visibility or noticeability. But Columns 10 “Scenic/Historic” and 11 “Residential” depict conditions of affected scenery. Whatever impacts to the human environment are caused by changes to scenic quality (noted in the previous tables) could easily be factored into this chart—thereby avoiding the connotation (or is it denotation?) that change in and of itself is an impact.</p>	The “connotation that change in and of itself is an impact” is accurate for the Project, in no case is there an increase in scenic quality. There are no changes based on effects of the Project that are not a high, moderate, or low impact to the human environment. Each of the items in the chart supports the overall impact analysis for each KOP. The scenic quality change analyses are not based on current KOPs.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM - Colorado State Office	700-1748	Appendix I, Table I-11 Landscape Scenery Impacts: This table only classifies "Landscape Scenery Impacts" as Low, Moderate and High but fails to explain what they are or why they are classified as listed. There is a footnote (number 1) following the word "Classifications" in the last column, but no footnote appears in the draft. This draft appears to fall short on this. NEPA is very clear on this. In the BLM's 1790 NEPA Handbook: Section 6.7.1 Affected Environment states: "The affected environment section succinctly describes the existing condition and trend of issue-related elements of the human environment that may be affected by implementing the proposed action or narrative. The CEQ regulations discuss "human environment" at 40 CFR 1508.14; the term broadly relates to biological, physical, social and economic elements of the environment." (emphasis added) "Effects can be ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health. Effects may also include those resulting from actions that may have both beneficial and detrimental effects; even if on balance the agency believes that the effects will be beneficial (40 CFR 1508.8)." [emphasis added]	The appendix text has been updated to reflect your comment.
BLM - Colorado State Office	700-1749	Appendix I, Table I-12 Scenic Quality Classes Changed by the Project: The draft is unclear on both the character of these changes (are they before or after mitigation?) and the purpose for their inclusion here (is it to articulate changes to existing VRI classifications? Or what?) This appears to fall short.	This is described in the appendix text under Residual Landscape Scenery Impacts and indicates the change after mitigation. Yes, it is to articulate changes to existing VRI classifications based on changes to the scores in the scenic quality ratings.
BLM - Colorado State Office	700-1750	Appendix I, Table 1-13 High Sensitivity Viewers – After Mitigation: Unlike the previous table, this one makes clear its intent to portray conditions after mitigation. Secondly, while the title reads "High Sensitivity Viewers" the last column reads "Impact." Despite the title, the intent appears to be the latter. Yet there is nothing in the table describing the nature of the impact. And what does it mean that there are "High, Moderate, or Low" impacts to high sensitivity viewers. Seems unintelligible.	This is based on the impact parameters in Section 3.12.6.1 Methodology and Tables 3.12-5 and 3.12-6. A footnote is added to the appendix Table I-13.
BLM - Colorado State Office	700-1751	Appendix I, Table I-14 Moderate Sensitivity Viewers – After Mitigation: See comments for Table I-13	This is based on the impact parameters in Section 3.12.6.1 Methodology and Tables 3.12-5 and 3.12-6. A footnote is added to the appendix Table I-14.
BLM - Colorado State Office	700-1752	Appendix I, Tables I-15 & I-16 Compliance or Consistency with BLM VRM Classes...Before and After Mitigation: Changes before and after mitigation cannot readily be compared by presenting these as two separate tables. This could easily be facilitated, however, by adding another column to Table 15 to which the last column from Table 1-16 would be added. Please do this so that readers can readily determine mitigation effectiveness.	The appendix Table I-15 has been edited to reflect your comment.
BLM - Colorado State Office	700-1753	Section 3.12.1, Page 3.12-1, Regulatory Background: Relevant sections of NEPA directing that environmental assessments analyze effects to the human environment (see comments above). Those requirements are conspicuously missing from this section. Despite the absence of BLM guidance on how to do this for visual resources, these NEPA directives are particularly relevant for "scenic values," as stated in FLPMA. This appears to be a significant shortcoming of the draft.	NEPA directives have been added to the section under Regulatory Background.
BLM - Colorado State Office	700-1754	Section 3.12.1.2, Page 3.12-1, BLM Resource Management Plans: This synopsis of VRM Class objectives is incomplete. VRM Class Objectives specify both 1) levels of change to the characteristic landscape and 2) the degree to which management activities attract attention. This section of the draft omits that second component of each objective (see BLM 8410 Manual). The draft has this right in Table 3.12-1, but not in this section of the narrative.	The text in the section has been appended based on the comment.
BLM - Colorado State Office	700-1755	Section 3.12.2.1, Page 3.12-3, Visual Resource Inventory—VRI Classes: This states that "VRI classes represent the relative value of the visual resources and provide the basis for considering visual values in the resource management planning process." By contrast, the 8410 manual states, "Inventory classes are informational in nature and provide the basis for considering visual values in the RMP process." All three matter. This distinction is not inconsequential, for the visual values to which the 8410 manual refers are portrayed by scenic quality, visual sensitivity and distance zone classes. The VRI classes themselves do not represent the relative value of visual resources; they are merely combinations of scenic quality, visual sensitivity and distance zones that are automatically determined by the classification matrix included in Illustration 11 of BLM's 8410 manual.	The text has been augmented to address this concern.
BLM - Colorado State Office	700-1756	Section 3.12.4, Page 3.12-5: Baseline Description. This section is still under the larger sub-heading, 3.12 Regulatory Background. That background in the draft includes both VRI classes (the existing conditions baseline that portrays the "Affected Environment" to which NEPA anchors Eas) and VRM class objectives (the administrative baseline as portrayed in approved RMPs. What's in this section of the draft looks good but is incomplete without adequately differentiating among these two contrasting baselines, because the draft appears to alternately address both. This needed clarification appears to be very important.	The section has been edited to address your concern.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
BLM - Colorado State Office	700-1757	<p>Section 3.12.6, Page 3.12-6 et. al., Impacts to Visual Resources: There are several significant problems with the second sentence of the first ¶ on p. 3-12-16 and the first ¶ under this header on p. 3.12-12:</p> <p>The statement on p. 3-12-12 fails to adequately differentiate between “impacts” (the existing conditions baseline) and “compliance” (the administrative baseline). About “Potential impacts...” it states, “These include potential impacts to people (the viewing public), impacts to scenery, and compliance with visual resource management objectives or consistency with USFS scenic integrity or visual quality objectives.” This is untrue, for compliance with VRM objectives must not be represented as a part of impact analysis because it is gauged by approved VRM class objectives and not by the affected environment as required by NEPA. The first two parts of the statement on p. 3-12-12 (quoted above) appear to be on-target, but they are contradicted by the second sentence of the first ¶ of p. 3-12-16 which states, “The analysis of visual resources impacts is based on the assumptions that disturbance of people’s views and changes in the scenic landscape are impact parameters.” This makes no sense because:</p> <ul style="list-style-type: none"> • The statement on p. 3-12-12 already explains that the analysis goes beyond the assumptions stated here. • And indeed the work that Merlyn Paulson has done looks at the concerns of affected visually sensitive publics in particular, and does not simply assume the existence of impacts simply on the basis of unspecified view disturbance or change. <p>The third sentence of the first ¶ on p. 3-12-16 states further that, “In addition, non-compliance or inconsistency with agency management objectives indicates impact significance.” This is not true and indicates further confusion between administrative and existing conditions baselines. Impacts must be assessed against the affected environment as required by NEPA. That environment is initially described by VRIs, and is supplemented by public input obtained from scoping meetings, etc. Non-compliance with agency objectives has nothing to do with the affected environment and NEPA impacts because VRM Class objectives are administratively determined.</p> <p>Remaining sentences of the first ¶ on p. 3-12-16 shift gears by describing physical characteristics of the transmission line and types of accompanying landscape change in general. But we must not represent these as impacts if they cannot somehow be related to the affected human environment. Once again, change ≠ impact. To comply with NEPA, changes in and of themselves must not be misrepresented as impacts to the human environment. The nature of those effects, not the change, must be described.</p> <p>Please correct.</p>	The section has been edited to address this comment based on direction provided by the BLM project leads.
BLM - Colorado State Office	700-1758	<p>Section 3.12.6, page 3.12-16, Table 3.12-3 Analysis Considerations for Visual Resources: Two sections of this table are unclear and/or incomplete. These comments echo some of the same concerns identified above. 2nd Row: Landscape change in and of itself must not be misrepresented as an impact to the human environment. The challenge is to demonstrate how change affects particular elements of the affected human environment. To be more specific: • In terms of affected landscapes, features, and views, would the project impact: 1. Scenery that is particularly valued? 2. Publicly prominent views, landmarks or icons? 3. Special areas? 4. Adjoining lands? • In terms of affected publics sensitive to scenic values, does the project impact: A. Towns or urban communities? B. Rural residences or ranches? C. Business and industry? D. Recreation-tourism and leisure visitors? E. Other travelers? As mentioned in the above comments, it is unclear why these two dimensions of impact to scenic values are not better integrated. 3rd Row: This table still falls under “3.12.6 Impacts to Visual Resources,” but the third row is not impacts (existing conditions of the affected environment) but compliance (administrative conditions outlined by agency objectives). Consistent with the above remarks, this part of the table needs to be placed in another section of the draft to avoid confusing it with NEPA analyses.</p>	The section has been edited to address concerns in this comment as directed by the BLM and Forest Service project leads.
BLM - Colorado State Office	700-1760	<p>Section 3.12.6, Page 3.12-16, Text that follows Table 3.12-3: Comments immediately above apply here also:</p> <ul style="list-style-type: none"> • 1st bullet: foreground degradation of scenic quality cannot be considered an impact if the affected human environment adversely affected is not identified. • 2nd paragraph does this. • 3rd paragraph: again and again, compliance with VRM objectives (administrative environment) must not be represented as visual resource impacts (affected environment). 	The section has been edited to address these concerns as directed by the BLM and Forest Service project leads.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM - Colorado State Office	700-1761	Section 3.12.6.1, Page 3.12-17, 3.12.6.1 Methodology: The 2nd ¶ on this page is inadequately integrated with the second. This is now sounding like a “broken record” because the deficiency shows up so many times in the draft. This separation of VRI scenic quality from public sensitivity and distance zones throughout the draft is problematic. Impacts to “scenic values” requires looking at all scenic values—which for the BLM involves scenic quality, visual sensitivity and distance zones. The challenge then is a) to integrate these components and b) document how the analysis links the public concerns of visually sensitive publics across affected landscape features and views to the elements of the human environment affected by the proposed project. See comment 17 above for more detail in this regard.	The section has been edited to address these concerns as directed by the BLM and Forest Service project leads.
BLM - Colorado State Office	700-1762	Section 3.12.6.1, Page 3.12-17, 3.12.6.1 Methodology: The 3rd ¶ on this page should be in another section dealing with VRM Class compliance since it is not part of NEPA impact assessment.	The presence of VRM compliance in this section, in addition to impacts to the human environment, is based on approved precedents and direction from the BLM project leads.
BLM - Colorado State Office	700-1763	Section 3.12.6.1, Page 3.12-17, Impact Parameters: This sentence also needs help: “Impacts were assessed by comparing the Project’s visual contrasts with landscape scenery, sensitive viewers, and compliance and consistency with BLM and USFS visual management objectives, respectively.” <ul style="list-style-type: none"> • The first part of the sentence starts off right—including scenic quality and visual sensitivity—but omits visibility (i.e., distance zones). • For the nth time, the second half is not impact assessment (i.e., existing conditions baseline) but compliance monitoring (i.e., administrative baseline). 	The section has been edited to reflect your comment.
BLM - Colorado State Office	700-1764	Section 3.12.6.1, Page 3.12-17, Last Paragraph: NEPA’s impact assessment requirements cannot be met by looking at Scenic Quality in a vacuum from the visual sensitivity of affected publics and project visibility, as the draft affirms it has done. Because all components of scenic value need to be integratedly assessed, it makes no sense to state that, “Landscape scenery impacts (Table 3.12-4) were determined based on the comparison of contrasts with the scenic quality inventory of the affected environment (Appendix 1, Figure 1-11 and Appendix I, Table 1-11).”	Thank you for your insight. The narrative is based on approved precedent and direction from the BLM project leads. In addition, the text has been updated to clarify the integration of these elements (scenery, sensitivity, visibility, and distances).
BLM - Colorado State Office	700-1765	Section 3.12.6.1, Page 3.12-18, Table 3.12-4 Landscape Scenery Impacts: This table does not depict impacts as it states, but only degrees of visual contrast instead. This is problematic.	Thank you for your insight. The narrative is based on approved precedent and direction from the BLM project leads. In addition the text has been updated in include clarification of the integration of scenic quality, sensitivity, visibility and distance zones.
BLM - Colorado State Office	700-1766	Section 3.12.6.1, Page 3.12-18, Table 3.12-5 Sensitivity Level/User Concern Impacts: This table appears to misrepresent variations in the visibility of project contrast as impacts. Once again, change ≠ impacts.	Thank you for your insight. The narrative is based on approved precedent and direction from the BLM project leads. In addition, the text has been updated to include clarification of the integration of scenic quality, sensitivity, visibility and distance zones.
BLM - Colorado State Office	700-1767	Section 3.12.6.1, Page 3.12-19, First Paragraph following Table 3.12-6: This discussion of compliance with BLM VRM objectives belongs in an RMP compliance section because the analysis is based on the RMP’s administrative baseline rather than the existing conditions baseline as required by NEPA.	The discussion is in the visual section based on approved precedent and direction from the BLM project leads. It is also located in the RMP compliance section, to the extent applicable to the Project and as approved by the BLM.
BLM - Colorado State Office	700-1768	Section 3.12.6.1, Page 3.12-19, Table 3.12-7 Impact Level Criteria: Row 1, Line 1: Project dominance in Class A or Class B landscape scenery must not be equated with High impacts. Row 2, Line 1: Project co-dominance in Class B scenery must not be equated with Moderate impacts. Row 2, Line 3: It is not clear why the project’s parallel location to existing linear projects would render it as having moderate impact. Row 3, Line 1: Project dominance or co-dominance in Class C landscape scenery must not be equated with low impact.	Equating the levels of scenic quality with impacts is based on approved precedent and direction from the BLM.
BLM - Colorado State Office	700-1769	Section 3.12.6.1, Page 3.12-19, Table 3.12-8 BLM Compliance: This table does not belong in the impact section for the same reasons given multiple times in the above comments.	This table is present in the visual section based on approved precedent and direction provided by the BLM project leads.
BLM - Colorado State Office	700-1770	Section 3.12.6.1, Page 3.12-20, 3.12.6.2 Impacts from Terminal Construction and Operation: This narrative should be adjusted in accordance with the previous observations as required by NEPA’s logic that requires identifying not just change but effects to the affected human environment.	The text has been edited and augmented to reflect your comment regarding the human environment and impacts vs. contrasts.
BLM - Colorado State Office	700-1771	Section 3.12.6.3, 4, and 5, Page 3.12-21 et al.--3.12.6.3 Impacts Common to all Alternatives and Associated Components, 3.12.6.4 Region I, and 3.12.6.5 Region II. These narratives should all be readjusted consistent with the above noted deficiencies to meet NEPA’s requirements.	The text has been edited and augmented to reflect your comment regarding contrasts vs. impacts to the human environment.
BLM - Colorado State Office	700-1772	Section 3.13, Page 3.13-10, Figure 3.13-1 Region I Recreation Areas: Where are the environmental effects of the potential Ground Electrode Sites depicted in this figure (lying just east of the Little Snake River in the Great Divide area) on both scenic values and recreation addressed?	Recreation impacts from these ground electrode sites are discussed in Section 3.13.6.9 under the heading "Alternative Ground Electrode Systems in Region I" on DEIS page 3.13-46 and in Table 3.13-22 on DEIS page 3.13-47. The Little Snake East and West ground electrode sites have been removed from the analysis in the FEIS. Visual impacts caused by ground electrode sites are discussed in Section 3.12.6.2.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM - Colorado State Office	700-1773	Section 3.13, Page 3.13-16 , Table 3.13-5 Federally Dispersed Rec Opportunities w/in Region I Little Snake FO Row: Consider adding wild horse viewing for Sand Wash Basin. The Yampa River is mentioned as being hydrologically intact and that the portion between Craig and Maybel receives intensive recreation use. But the draft does not appear to mention flat water boating on either the Yampa or the Little Snake River. Also, the Great Divide area and Little Snake River environs are valued for their “big open” and relatively undeveloped old west character for sightseeing.	Wild horse viewing was added to the text for activities within the Field Office in Table 3.13-5 and within the South Sand Wash SRMA in Table 3.13-6, both in Section 3.13.5.1. Text regarding flatwater boating on the two rivers and sightseeing in the Great Divide and Little Snake River areas was added for the Field Office in Table 3.13-5 in Section 3.13.5.1.
BLM - Colorado State Office	700-1774	Section 3.13, Page 3.13-17 & 18, Tables 3.13-6 Federally Managed SRMAs & Table 3.13-7 State and Locally Managed Recreation Areas within Region I In Table 3.13-6, The Yampa Valley Trail is not an SRMA, although portions of it lie within the Little Yampa Canyon SRMA. In both tables, the overlapping relationship between Little Yampa Canyon SRMA and Yampa River State Park is not made clear in the draft.	Text was added to Table 3.13-6 indicating the trail itself is not a SRMA, but partially lies within the Little Yampa Canyon SRMA. The relationship between the SRMA and the State Park was clarified in both Table 3.13-6 and Table 3.13-7 in Section 3.13.5.1 by adding text that states Colorado Parks and Wildlife is the primary manager of all Yampa River public access sites, including those on BLM lands, under a cooperative agreement with BLM.
BLM - Colorado State Office	700-1775	Section 3.13.6, Page 3.13-29 Impacts to Recreation, 2nd ¶ Lines 5-8 define recreation opportunities “as the combination of the natural elements...and human-controlled conditions...that create the potential for recreation and may include dispersed or specially managed opportunities.” Private sector visitor services, such as those provided on-site by both river boating and upland hunting/OHV outfitters and guides also play a significant role in producing dispersed recreation opportunities in this area. The same ¶ also defines “recreational expectations” as assumptions, and further defined “user satisfaction” as the subjective evaluation of the degree to which activities and experiences meet those expectations. This is not completely accurate. Public recreation-tourism desires or preferences, not mentioned in this paragraph, play a greater role influencing satisfaction than the draft’s silence on this matter indicates. In addition, expectations are more conditioned by factors such as promotional marketing and outreach materials, and prior experience than they are simply assumptions. Thus satisfaction tends to hinge more on the degree to which recreation-tourism outings enable participants to achieve their desires. Expectations therefore condition what publics believe is there and whether they believe it can satisfy their desires.	The definition of recreation opportunities in Section 3.13.6 was modified to include human-controlled conditions and services (e.g., roads and trails, developed sites, facilities, guiding services). The definition of recreational expectations in Section 3.13.6 was modified to include users knowledge, preferences or desires (“...having prepared for the desired recreational experience [given their knowledge, preferences or desires]). Knowledge encompasses both prior experience and expectation of an experience given knowledge gathered from promotional marketing and outreach materials. The definition of user satisfaction in Section 3.13.6 was modified to include recreational desires along with recreational expectations.
BLM - Colorado State Office	700-1776	Section 3.13.6, Page 3.13-29 Impacts to Recreation, 3rd ¶ Consider changing items 1 and 2 in response to the above comments. Also: 1. This sentence is more than a bit upside down: recreation opportunities include the chance to engage in outings and activities; within desired physical, social and operational settings; and to achieve desired experiences and other recreating benefits. Each area, not activity, has its own complement of recreation opportunities. 2. It is the degree to which recreation opportunity components line up with individual participant recreation-tourism desires that determines satisfaction (i.e., Were they able to engage in their preferred activities, within their preferred settings, access their desired services, and achieve their desired experiences and benefits?).	Opportunities have been removed from both numbered statements and replaced with "desires" in Section 3.13.6.
BLM - Colorado State Office	700-1777	Section 3.13.6, Page 3.13-30 thru 32 Sections 3.13.6.1-3.13.6.7 The problem with approaching the analysis by groups of recreation activities is that these are not “airtight” categories. For example, it is well-understood that many who view or hunt wildlife drive OHVs and enjoy the scenery. Likewise scenery has been shown to be important to boaters, anglers, and non-mechanized participants as well. Further integration is needed to avoid a “plastic” analysis of impacts on the affected human environment.	It is understood that people within each activity group may participate in more than just the primary activity that the group is centered around. Therefore, the impact analysis describes general recreation impacts, such as setting (scenery), access, noise, etc., as well as impacts to specific user groups.
BLM - Colorado State Office	700-1778	Section 3.13.6.8, Page 3.13-38 3.13.6.8 Impacts Common all Alternative Routes.... [] Under SRMA, 5th Paragraph: “Within the Little Snake FO”: “No SRMAs would be located within...” Did you mean the 250-foot-wide transmission line would not be located within any SRMAs—since the proposal is not to locate SRMAs? But would the proposed action’s alteration of the landscape: • Adversely impact key aesthetic elements of the affected recreation-tourism human environment: a) recreation-tourism participants? b) and/or businesses that depend on those participants? c) Affected communities, economically? • Either with respect to SRMAs or outside them?	In Section 3.13.6.8, the SRMA sentence has been revised to indicate the line would not be located within any SRMAs. Because Alternative I-A would not impact a SRMA, impacts to lands within the Little Snake FO are covered under the heading "BLM Dispersed Recreation Areas" within Alternative I-A in Section 3.13.6.9. This section states the alternative "...would affect recreationists by displacing visitors due to area closures, noise or visual presence of construction...". The text also describes impacts to hunter and wildlife user groups. Economic effects are discussed in Section 3.17 Socioeconomics.
BLM - Colorado State Office	700-1779	Section 3.13.6.8, Page 3.13-38 et al. All Impact Sections Please consider the need to tighten up these narratives so that they go beyond merely describing change to describe elements of the recreation-tourism human environment impacted by that change. Thank you!	The specific environmental impacts that would affect the user groups present in the project area are described in Sections 3.13.6.1 to 6. In addition, general environment changes that would affect the experiences of dispersed recreation users are described in Section 3.13.6.8. In Sections 3.13.6.9 to 12, effort was made to be specific regarding what environmental changes would affect recreation users, such as construction noise, human presence, traffic, etc.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM - Colorado State Office	700-1780	Page 3.2-1 Move ALL of this 1st paragraph, except the last sentence of 1st paragraph to be a new separate paragraph below this sentence in the last paragraph of that section, "Other lms include WO-IM-2012 140 and 141 (BLM 2012a,b).". Otherwise, this order is confusing, and gives history we have since mostly moved away from. Should show current laws and policy first for BLM, then the history paragraph, then transition to the USFS paleo info.	The paragraph in Section 3.2.1.2 was revised according to the suggestion stated in the comment.
BLM - Colorado State Office	700-1781	Table 3.2-2 The Uinta Formation should be PFYC 5 (or 4-5, but not 4), as the Colorado part is listed PFYC 5 in the White River Field Office (Meeker, CO).	Table 3.2-2 in Section 3.2.5.1 was revised according to the suggestion stated in the comment.
BLM - Colorado State Office	700-1782	Table 3.2-2 The lles Formation should be PFYC 5 (or 4-5, but not 4) as the Colorado part is listed PFYC 5 in the White River Field Office (Meeker, CO)	Table 3.2-2 in Section 3.2.5.1 was revised according to the suggestion stated in the comment.
BLM - Colorado State Office	700-1783	Table 3.2-2The Dakota Formation should be PFYC 3-5, as those parts of Colorado affected rank it PFYC 3	Table 3.2-2 in Section 3.2.5.1 was revised according to the suggestion stated in the comment.
BLM - Colorado State Office	700-1784	1st Paragraph, Alt A: Several PFYC unit numbers are incorrectly listed as roman numerals. Hence "category III" should be "PFYC Class 3", "V" should be "PFYC 5", and "PFYC II" should be "PFYC 2"	Suggested changes have been made to the text.
BLM - Colorado State Office	700-1785	3rd Paragraph, Alt B: "Category III and V PFYC areas" should be "PFYC 3 and 5 areas"	Suggested change has been made to the text.
BLM - Filmore Field Office	698-1797	Please replace the FFO comments submitted on August 2nd with the attached updated comments attached to this email.	The replacement of comments has been made. Each comment has an individual response.
BLM - Filmore Field Office	698-1798	The Sevier Playa Project is designed to recover potash and other solid leasable minerals through evaporative concentration of saline brines from the sediments of the Sevier Playa, a normally dry lakebed. The playa is approximately 26 miles long by an average of 8 miles wide and covers approximately 140,000 acres. The potash extraction located on BLM-leased lands and the processing facilities located on SITLA-leased lands will not require a BLM ROW. The "off lease" ancillary facilities that will require a BLM ROW grant include: • Power lines • Gas pipelines • Water pipelines • Rail facility • New spur track • Access roads and other facilities as needed. (see original letter for additional information regarding this project)	The Sevier Playa Project was added to the reasonably foreseeable future action list for Region III and the Chapter 5 analysis was updated appropriately.
BLM - Filmore Field Office	698-1799	The proposed project is a utility-scale wind energy generating facility of 160 megawatts (MW) to be located on 35,920 acres of Bureau of Land Management (BLM) land and 3,680 acres of State land, approximately 26 miles southwest of Delta, Utah. The project would include up to 107 turbines and would require an underground electrical collection system, roads, a substation and switchyard, an operations and maintenance building, up to three permanent and six temporary meteorological towers, and associated temporary and permanent structures and interconnect the facility into an existing 230-kilovolt (kV) transmission line that crosses the project. (see original letter for additional information regarding this project)	The Long Ridge Wind Development Project was added to the reasonably foreseeable future action list for Region III and the Chapter 5 analysis was updated appropriately.
BLM - Filmore Field Office	698-1800	This wind energy site testing and monitoring grant authorizes the installation of two (2) met towers on approximately 27,566.54 acres of project land. This grant is issued for three (3) years and expires on December 31, 2015. The FFO will provide shapefiles of the project area granted. An amendment (to add Met towers and maybe adjust the project area) and an assignment are being planned for this ROW grant. (BLM is waiting for the ROW application.) (see original letter for additional information regarding this project)	The Energy of Utah-Long Ridge Wind Development Project was added to the reasonably foreseeable future action list for Region III and the Chapter 5 analysis was updated appropriately.
BLM - Filmore Field Office	698-1801	Section 2.4.2.1 Project Description The first paragraph states, "All of the details on proposed Project facilities, construction methods, Project operation, and maintenance practices, including vegetation management, are provided in Appendix D." There is no mention of where details on decommissioning can be found. Add "decommissioning" to this sentence, since decommissioning is also described in Appendix D, the PDTR. The second paragraph gives a very brief summary of construction activities/disturbance. Add a brief summary of construction activities by facility. (Examples can be provided upon request.) The third paragraph gives a very brief summary of operation and maintenance disturbance areas. Add a brief summary of operation and maintenance activities by facility. (Examples can be provided upon request.) Add an additional paragraph with a very brief summary of decommissioning disturbance areas and decommissioning activities by facility.	Within Section 2.4.2.1 of the Final EIS, decommissioning was added, as well as summaries of construction, operation, maintenance, and decommissioning by facility type.

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Commenter Name	Comment ID	Extracted Comment	Response
BLM - Filmore Field Office	698-1802	Section 2.4.3.1 First paragraph, last sentence, add "that" between "require an" to read "Design Option 3 would require that an AC substation be constructed ..."	Section 2.4.3.1 has been edited as suggested.
BLM - Filmore Field Office	698-1803	Table 2-23, 2-24, 2-25, 2-26 These tables describe the summary of resource impacts by region. In many cases, under the resource topic column, the phase of the project during which impacts would occur is listed. The construction and operation phases are the only phases mentioned. Many of these same impacts would occur during the maintenance phase and again during the decommissioning phase. The table should be edited under each resource to identify impacts that would occur during the maintenance phase and/or the decommissioning phase.	The Chapter 2 summary tables in the Final EIS were edited to include project phase including construction, operation, maintenance, and decommissioning.
BLM - Filmore Field Office	698-1804	Section 3.5.6.5, Region III The following statement should be deleted from the analysis of Alternative III-B and III-C. • "Alternative III-B (Alternative III-C) would cross in the vicinity of the Little Sahara Sand Dunes Recreation Area. Due to the sandy substrate, shifting topography, and winds in the area, reclamation would be difficult and most likely would not be successful. See Section 3.3, Soils, for more detail." The alternatives impacted by the Little Sahara Sand Dunes are Alternatives II-A, II-D, and II-E. Add this information to the analysis for these three alternatives.	The requested text has been deleted from the analysis of Alternative III-B and III-C, and added to the analysis discussion for Alternatives II-A, II-D, II-E, and II-F.
BLM - Filmore Field Office	698-1805	Section 3.5.6.5, Region III Delete the following text from the Region III Conclusion. • "Alternative III-B and Alternative III-C would cross in the vicinity of the Little Sahara Sand Dunes Recreation Area, which would be difficult to reclaim. For more information, see Section 3.3, Soils." The alternatives impacted by the Little Sahara Sand Dunes are Alternatives II-A, II-D, and II-E. Add this information to the analysis for these three alternatives in Region II.	The requested text has been revised as requested, and included in the FEIS as part of Alternative II-F because of the adjusted routing of that alternative.
BLM - Filmore Field Office	698-1806	Section 3.7.6.5, Region III Alternative III-B (Agency Preferred), first paragraph, fourth sentence, change "U.S. Highway 6" to "U.S. Highway 6/50".	Text in Section 3.7 has been modified to address comment.
BLM - Filmore Field Office	698-1807	Section 3.12.6.3: A portion of previous comment (111-192) not adequately addressed. Design Option 3 – Facilities and impacts would not be the same as the proposed action as stated in this section. Facilities and impacts would be different, due to facilities being constructed near IPP that would not be part of the analysis under the TWE proposed action or alternatives.	The impacts have been addressed in the section under design options.
BLM - Filmore Field Office	698-1808	Table 3.12-17: Previous comment (111-188) is not adequately addressed. Alternative III-A and Alternative III-C, Segment 470, Human Environment, delete U.S. 6 and add U.S. 6/50. The table shows "Old 6 and 50", but the current highway U.S. 6/50 is also crossed.	The section has been updated to reflect the comment.
BLM - Filmore Field Office	698-1809	Table 3.12-17: Previous comment (111-187) is not adequately addressed. For Alternative III-A, Alternative III-B and Alternative III-C, Segment 450, Human Environment, add Brush Highway.	The section has been edited to reflect the comment.
BLM - Filmore Field Office	698-1810	Table 3.12-17: Previous comment (111-189) is not adequately addressed. For Alternative III-C, Segment 460, Human Environment, add Old U.S. 6/ 50 and the current U.S. 6/50.	The section has been edited to reflect the comment.
BLM - Filmore Field Office	698-1811	Table 3.12-17: Previous comment (111-190) not adequately addressed. Change "Chrystal Peak Rd" to "Crystal Peak Rd" in the following three locations in the table. • Alternative III-A, Segment 480; • Alternative III-B, Segment 480; and • Alternative III-C, Segment 480.	The section has been edited to reflect the comment.
BLM - Filmore Field Office	698-1812	Section 3.13.6.9, Region I BLM Dispersed Recreation Areas, first paragraph, last sentence, add "corridor" after "2-mile transmission line".	The text in Section 3.13.6.9. has been revised as requested and to reflect the FEIS refined transmission corridor.
BLM - Filmore Field Office	698-1813	Table 3.13-13 : Table refers to "Mountain Meadows Massacre Site" yet elsewhere in the document this site is referred to as "Mountain Meadows NHL and Site". If a change is necessary, use consistent terminology throughout document.	The name of the site was changed to "Mountain Meadows NHL and Site" in Table 3.13-13 in Section 3.13.5.3 to be consistent with other sections.
BLM - Filmore Field Office	698-1814	Section 3.13.6.1, Region III: Second full paragraph, first sentence, refers to "Mountain Meadows Massacre site" yet elsewhere in the document this site is referred to as "Mountain Meadows NHL and Site".	The name of the site was changed to "Mountain Meadows NHL and Site" in Section 3.13.6.11 to be consistent with other sections.
BLM - Filmore Field Office	698-1815	Table 3.13-31: Numerous places in this table refer to ""Mountain Meadows Massacre site" yet elsewhere in the document this site is referred to as "Mountain Meadows NHL and Site"	The name of the site was changed to "Mountain Meadows NHL and Site" in Table 3.13-31 in Section 3.13.6.11 to be consistent with other sections.
BLM - Filmore Field Office	698-1816	Section 3.14: Previous comments, (111-194, 111-195, 111-196, 111-197, 111-199, 111-203, and 111-204), were all in regard to the DMAD Reservoir. The Response to all these comments stated that references to DMAD Reservoir were deleted from the recreation section and were added to the land use section. All references to DMAD were removed from the recreation section; however, the lands section contains no reference to the DMAD Reservoir. Add references to the DMAD Reservoir to the lands section as stated in the Responses.	The DMAD reservoir was added to Section 3.14.5.1, Region II Summary, Table 3.14-14 and the impacts analysis narrative for Alternative II-C.

Table L-1 Response to Substantive Comments Received on Draft EIS

Committer Name	Comment ID	Extracted Comment	Response
BLM - Filmore Field Office	698-1817	Section 3.14.5: Region III, first paragraph, second to last sentence, change to read, "MWC Phase III (Millard and Beaver counties) is a wind development planned on state and private land. The ROW application for MWC Phase IV was a 400 MW project planned on BLM, state and private land. Due to the expiration of the Production Tax Credits and their bid for a Power Purchase Agreement not being selected, this ROW application has been withdrawn."	The status of the Milford Wind Project was updated in Section 3.14.5.
BLM - Filmore Field Office	698-1818	Section 3.14.6.4: Alternative II-F (Agency Preferred) doesn't include the statement, found in the analysis of Alternative II-B and Alternative II-C regarding being inconsistent with the goals of Millard County, etc. Alternative II-B and Alternative II-F follow the same route through Millard County so the Millard County analysis should be consistent. Add the following analysis to the Alternative II-F (Agency Preferred) analysis. "There are no identified incompatible land uses within these communities; however, because this alternative would not be located within the WWEC in Millard County, it would be inconsistent with the goals, objectives and implementation strategies of the Millard County General Plan and would require a General Plan and Utilities Corridor Map amendment prior to the approval of any required land use application(s)."	The analysis for Alternative II-F has been updated to include the same information contained under the discussions for Alternatives II-B and II-C regarding incompatibility with Millard County goals, using the language noted in the comment.
BLM - Filmore Field Office	698-1819	Section 3.16 Previous Comment (111-271) not adequately addressed. Consistent use of acronyms – Use of "environmental justice" or "EJ" and use of "Las Vegas Valley" or "LVV". The global search and replace has apparently not yet been done.	The proposed corrections noted in the comment have been made as requested.
BLM - Filmore Field Office	698-1820	Figure 3.16-3: The railroad between Fillmore and Delta should be removed on this figure also. It was already removed from Figure 3.16-2.	Figure 3.16-3 was revised as suggested.
BLM - Filmore Field Office	698-1821	Section 3.16-6 Previous comment (111-250) not adequately addressed. Edit was not made to text as noted in Response. Change "right of way" to "right-of-way" or "ROW" if use of acronym is appropriate here.	The proposed correction has been made as requested.
BLM - Filmore Field Office	698-1822	Table 3.16-7 Previous Comment (111-269) not adequately addressed. U.S. Highway Crossings – The correct highway number, "U.S. 6/50" was added under the Alternatives III-B and III-C. Under Alternative III-A change "U.S. 6" to "U.S. 6/50".	The proposed correction has been made as requested.
BLM - Filmore Field Office	698-1823	Section 3.18.7.4: Alternative II-A, first paragraph, second to last sentence on page, states, "Sand dunes within Alternative II-A also may affect the safety of workers and the public during construction and operation (see Section 3.3 for further details)." In the analysis of Alternative II-A, II-D, and II-E add more detail as to how sand dunes would affect the safety of workers and the public during construction and operation, i.e., guy wires are a visually obscure safety hazard, guy wires pose a potential safety hazard to ATV riders in the Little Sahara Recreation Area, the shifting sands could reduce the distance from the ground to the conductors or undercut the structure and guy wires, and the dangers of construction in sand, etc. I know that TWE said they could just install taller towers to mitigate the distance from the ground to the conductor, but I didn't see that noted in the document either.	Text was modified within Section 3.18.7.4 to further describe safety measures within areas with sand dunes.
BLM - Filmore Field Office	698-1824	Figure 3.20-2, Figure 3.20-3: LWC Units 156 and 181 show on Figure 3.20-2 but do not show on Figure 3.20-3.	This was in error. Figure 3.20-3 has been updated to reflect recent inventory information for the Final EIS and has been reviewed to ensure all units are displayed on the appropriate figures.
BLM - Filmore Field Office	698-1825	Page 3.20-5, All Figures Previous Comment (111-270) not adequately addressed. • All figures in the DEIS incorrectly identify the highway between Delta, Utah and Ely, Nevada as Hwy. 6 in Utah and Hwy. 50 in Nevada. This highway needs to be labeled as U.S. 6/50 in both Utah and Nevada.	The mapping of transportation resources uses the ESRI Major Highways dataset (2005) as the source of attribute information. Section 3.1.6.5 discloses the impacts of the alternatives in Region III to the transportation network. In this section, the highway referenced above is cited as US-6/50. Figure 3.16-3 has also been edited to include the US-50 designation in Utah; however, the remainder of the figures have not been edited because the highway numbering is inconsequential to the map content.
BLM - Filmore Field Office	698-1826	Section 3.20: The LWC tables in the DEIS are inaccurate for the FFO. Tables should reflect "TBD" (To Be Determined) upon completion of LWC inventories in the FFO. No current data exists due to lack of previous data from 1979 inventories. We have no data for the units shown in the LWC tables in the DEIS. AECOM will be completing inventories of the following additional units: 186, 199, 107, 153, 155, 139, 157, 159, 160, and 161. Inventories on Units 155 and 163 were recently completed by the FFO. The result of the inventories will determine which units have LWC. The data collected will be added to the LWC tables, figures and analysis in the FEIS.	The Final EIS has been updated to reflect recent data from lands with wilderness characteristic inventories conducted in the Fillmore Field Office.
BLM - Filmore Field Office	698-1827	Chapter 5 The following projects need to be added to the reasonably foreseeable impacts in Region III of the TWE Project analysis: Sevier Playa Project and Long Ridge Wind Development Project. The Long Ridge Wind Project (site testing and monitoring) needs to be added to cumulative impact analysis. Additional information on each of the above projects is included in the attached August 7, 2013 update to the FFO Cumulative Project Considerations table.	The Sevier Playa Project and Long Ridge Wind Development Project were added to the reasonably foreseeable future action list for Region III and the Chapter 5 analysis was updated appropriately.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
BLM - Filmore Field Office	698-1828	Figure 5-5 The area identified as the Milford Wind Farm should be relabeled as the Milford Wind Corridor Wind Farm. The area shown should be revised to remove MWC Phase IV since this ROW application has been withdrawn and remove the area for the site testing ROW UTU-83210 which has also been withdrawn.	Chapter 5 of the FEIS was revised to address this comment.
BLM - Filmore Field Office	698-1829	Table 5-8 The Magnum Gas Storage Project shows the construction timeframe from 2012 – 2014. Change the construction timeframe to 2014 – 2016.	Chapter 5 of the FEIS was revised to address this comment.
BLM - Filmore Field Office	698-1830	Table 5-8 Renewable Energy row – change the sentence regarding Milford Wind Corridor Phase IV to read, “Phase IV (Millard County) the ROW application has been withdrawn.	Chapter 5 of the FEIS was revised to address this comment.
BLM - Filmore Field Office	698-1831	Appendix C, Table C.5-1: RANGE-4, third to last sentence, delete “41” from this sentence, “. . . Install a by-pass gate adjacent to existing cattle guards to 41 prevent damage by heavy equipment.”	The measure in Table C.5-1 has been revised as requested.
BLM - Filmore Field Office	698-1832	Appendix C, Table C.3-24 Previous comment (111-377) not entirely addressed. First row, Description column, last sentence, change “lines” to “line”.	Text edited as requested.
BLM - Filmore Field Office	698-1833	Appendix D Previous comments (111-387, 111-404, and 111-422), regarding the Fillmore Field Office and West Desert District not approving the use of guyed structures except in specific locations, has not been addressed in the DEIS or Appendix D, PDTR. The DEIS text does not mention this issue or analyze the varying range of impacts from the construction, operation, maintenance and decommissioning of the different structure types. Impacts from guyed structures include: guy wires extend over a wide project footprint, guy wires are a visually obscure safety hazard, guy wires pose a potential threat to sage grouse and other avian species, and guy wires pose a potential safety hazard to ATV riders in the Little Sahara Recreation Area, A call to AECOM revealed the following reasons why these comments have not been addressed – • This requirement was not in any of the RMPs. • AECOM wanted to leave it up to TWE to make changes to the PDTR and follow-up with BLM. • AECOM didn’t want to put a stricter stip. In the DEIS and then have to back-off to a less strict stip. In the FEIS.	The requirement by the BLM West Desert District referenced in this comment was included as additional mitigation prescribed within the special status wildlife and recreation Final EIS sections (Sections 3.7 and 3.13, respectively).
BLM - Filmore Field Office	698-1834	Appendix D Previous comments (111-388, 111-390 through 111-400, and 111-403), have not been addressed. The response to comments indicates that these comments were forwarded to TWE for their consideration. No changes were made in the PDTR as a result of these comments.	These comments have been submitted to TransWest for consideration and inclusion in their updated POD document that will be included with the Final EIS. An updated PDTR was not provided prior to the release of the Draft EIS.
BLM - Filmore Field Office	698-1835	Appendix D, Section 3.7 The last paragraph and bulleted list refer to Table 9 which identifies the phase(s) during which each mitigation measure would be implemented. Add an additional bullet – • D - decommissioning	Appendix D in the Final EIS was revised as indicated.
BLM - Filmore Field Office	698-1836	Appendix D, Table 9 Ecological Resources, No. 32, Phase(s), now shows P, C phases. Add “O” (operation and maintenance) and “D” (decommissioning) to this list. The text in the fourth column, “Description of Mitigation Measure”, already states that this mitigation measure applies to ROW construction, restoration, maintenance, and termination activities.	Appendix D and Appendix C (Table C.2-1, TWE-32) in the Final EIS were revised as indicated.
BLM - Filmore Field Office	698-1837	Appendix G, Table G-1 Response to previous comment (111-408) is inadequate. This change still needs to be made. Table G-1, page G-28, change “Broadbeard beardtongue” to “Neese narrowleaf penstemon”. This change was made in other locations in the EIS in response to previous comments (111-95, 111-232). Refer back to the comments and responses referenced.	The text has been updated as requested in Table G-1.
BLM - Filmore Field Office	698-1838	Appendix I, Table I-17 Previous comment (111-412) not adequately addressed. Table I-17, Segment 360, KOP-F-11, Delete “Nat” from “Little Sahara Nat Rec Area Road”	Text edited as requested.
BLM - Filmore Field Office	698-1839	Appendix I, KOP F-11 Previous comment (111-412) not adequately addressed. KOP F-11, Visual Contrast Rating Worksheet, Section A, Number 4, Delete “Nat” from “Little Sahara Nat Rec Area Road”	Text edited as requested.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Bradfield, Randall	411-604	And then another thing is we hear that there's two more lines coming through. And if that one goes through there, most likely the others will follow, and they only have to go, what is it, 250 feet away from that one? And they could just keep moving closer up to our cabin, until they go right across it, because it's the only logical place they could go.	Impacts from reasonably foreseeable future actions on the Region II area of concern (segment 219.60) are disclosed in Chapter 5 of the Draft EIS. There is only one identified reasonably foreseeable future transmission line project for this area, the Energy Gateway Southern project. The conclusion that additional transmission lines in Utah would necessarily follow this route is speculative and is therefore not included in the analysis.
Bramall, Max	413-606	I'm wondering why they have to have the wind farm in Wyoming when there's so much wind down by Beaver. This line would not be necessary except for maybe a hundred miles. The wind in Wyoming -- I worked out there as a surveyor -- and the wind is so violent that they have to turn the turbines off anyway, and down in Beaver it's a constant wind all the time. Unless they own property out there and they want it on their property, I don't see any reason for it.	Thank you for your comment. The proposed action is not a BLM- or Western-generated action. TransWest submitted a request to the BLM for a ROW across public lands in order to build a transmission line. As stated in Chapter 1 of the Draft EIS, the BLM's purpose is to consider the ROW application in accordance with 43 CFR Part 2800 and to analyze and disclose the environmental effects of granting a ROW. That analysis includes developing alternatives to the proposed route across federal lands. However, it is beyond the scope of the lead agencies' decision to be made, and therefore, this EIS analysis, to develop different energy sources or end markets for TransWest (See Sections 1.1.1.1 and 1.1.2.1 of the Draft EIS).
Buckner, Kelly	104-23	Remove all references to Daggett and Piute Counties. None of the alternatives pass through their borders.	These counties will be removed from the document as requested. However, they will remain in the list of cooperating agencies as appropriate.
Buckner, Kelly	104-24	WAPA has the authority to condemn private property in order to gain access or ROW to build any of their projects. Is this disclosed anywhere?	Western's ability to acquire private property rights for facilities built in the public interest under eminent domain laws is disclosed in Section 1.6 of the Draft EIS.
Buckner, Kelly	104-25	There seems to be no rationale with the way the resources are sequenced or how that chapters are organized. When all else fails, list the resource topics alphabetically.	Resource sections are ordered with physical resources first, biological resources second, and human environment third. Resource sections that were added through the cooperater-review and public-review processes have been amended to the end of Chapter 3 to maintain consistency with the original sections through the process.
Buckner, Kelly	104-26	Purpose and Need seem a bit fuzzy to me. For WAPA to say that the project needs to proceed simply because there is a mandate to provide renewable energy (though true) seems to miss the point. At the end of the day, this project should explain why we there is a need to send electricity from Wyoming to Nevada, and that is never really explained. Is it because Las Vegas needs it? If the electricity is not being used in Nevada, then where is it going and why? Rather, doesn't it make more sense to say that TWE project is sending electricity to a certain end-user market or that there a certain part of the country has a shortage and that this project helps alleviate that? What is the TransWest Express LLC Purpose and Need? What is the Forest Service Purpose and Need?	The CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). In this case, the agencies that are proposing the alternatives (i.e., the lead agencies for the EIS) are the BLM and Western, not cooperating agencies such as the Forest Service. Additionally, the purpose and need statement for an externally generated action must describe the agencies purpose and need, not an applicant's or external proponent's purpose and need (see 40 CFR 1502.13). Per the BLM NEPA Handbook H1790-1, "the applicant's purpose and need may provide useful background information, but this description must not be confused with the BLM purpose and need for action." TransWest's general objectives for the project are therefore included in Section 1.3 of the Draft EIS. The lead agencies' purpose and need are included in Section 1.1 of the Draft EIS.
Buckner, Kelly	104-27	What is the Uintah Ouray Indian Reservation Purpose and Need?	The CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). In this case, the agencies that are proposing the alternatives (i.e., the lead agencies for the EIS) are the BLM and Western (See Chapter 1 of the Draft EIS).
Buckner, Kelly	104-28	Table 1-1 - Why is the Navy Region Southwest, San Diego a cooperating agency?	The Navy Region Southwest, San Diego is the managing entity of Nellis AFB, which is located in the Project analysis area. Chapter 1 will be augmented to disclose this information.
Buckner, Kelly	104-29	Table 3.18-10 There are a number of communities identified that don't actually exist. I have redlined those that need to be removed. Most of these are train stops that have nothing but a siding, are ghost towns, or are river crossings that were never inhabited. Alternative II-A - Delete: Pines, Rio, Thistle, Gypsum Mill, Champlin Alternative II-B - Delete: Desert, Elba, Floy, Sagers, Vista, Cedar, Woodside Alternative II-D - Delete: Red Wash, Squaw Crossing, Martin, Heiner, Wildcat, Coal City Clear Creek, Milburn, Champlin Alternative II-E - Delete: Red Wash, Colton, Gilluly, Kyune, Mill Fork, Sky View, Tucker, Ioka, Pines, Rio, Thistle, Bridgeland, Champlin Alternative II-F - Delete: Red Wash, Squaw Crossing, Gilluly, Mill Fork, Sky View, tucker, Pines, Rio, Thistle Alternative III-B - Delete: (Utah) Modena, Bery, Heist, Yale Crossing, Zane (Nevada) Acoma, Brown, Moapa Alternative III-C - Delete: (Utah) Modena, Bery, Heist, Yale Crossing, Zane (Nevada) Yoacham, Horseshoe Bend, Beaverdam, North Las Vegas	Communities detailed in the comment were deleted from the text in Section 3.18.7.4, with the exception of Beryl and Clear Creek, UT and Beaverdam and North Las Vegas, NV, all of which have 2010 census populations.
Buckner, Kelly	104-30	Table 4-1 says that the only resources that may require a plan amendment are SSS, VRM, Water, and Wildlife. However Chapter 4 includes several other resources that will require plan amendments in addition to the few listed here. All resources that will require a plan amendment should be listed here.	Table 4-1 lists all resources crossed that have been identified for lack of compliance with resource objectives, stipulations, standards, and guidelines as noted in the "Non-conformance Issue" column of the table. The resources listed by alternative list all the resources identified that are in non-conformance. The resources listed in Table 4-1 is consistent with the description of proposed land use amendments described by field office and national forest in Section 4.4.
Buckner, Kelly	104-31	Table 4-1: The footnotes also regarding VRM that "Moderate in the current management plan and do not necessarily restrict the proposed use in the current approved plan. Therefore, plan amendments for these conflicts are not necessarily required, but are mitigated as determined by federal land managers." How do you mitigate VRM that has tall power lines and towers?	Please see Visual Resources Section 3.12. Mitigations VR-1 through VR-9 (see Section 3.12.6.3) are applied where appropriate and feasible to reduce impacts as much as possible and to identify location and level of residual impacts. A Visual Resources Mitigation Plan would be developed prior to construction and will include plans to address specific impacts. No changes made to document.
Buckner, Kelly	104-32	Appendix K (page KI-15) for the VFO RMP says an exception is only allowed for RECOGNIZED utility corridors. The only recognized corridors are those that currently in the RMP and do not include the TWE proposal. With the Gateway South and Zephyr projects following closely behind, extended and expanded utility corridors will amend the RMP. Until that happens, there is no exception. You can't apply an exception to a corridor that doesn't yet exist.	As discussed in Section 4.4.5 (pg. 4-38), plan amendments are proposed in this EIS process to create new utility corridors through the VFO where the TWE reference line deviates from designated utility corridors. The proposed amendment language also allows for BLM to grant exceptions where resource conflicts could not be mitigated or avoided within the new utility corridor designated through the plan amendment proposed as part of this EIS. Details on areas of resource conflict that may require such exceptions are listed in Section 4.4.5 and discussed in the associated impact analysis. All proposed amendments in the VFO would also accommodate other RFFA projects, including EGS and Zephyr, in addition to the TWE project. No changes made to document.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Buckner, Kelly	104-33	Table 4-1: There is also this footnote that states: "Resource conflicts were identified from affected management plans; however, these issues do not necessarily require a plan amendment as some issues allow exceptions in the current plan." I am not sure what exceptions are being referred to here. Because the footnote only mentions "some issues allow exceptions," it never specifies what they are not does it identify those that are allowed. In the meantime, there are other resources that also would also require amendments based on Appendix K surface stips: • Fragile soils/slopes 21-40% • Lears Canyon ACEC as well as relict vegetation in this ACEC • Nine Mile ACEC	The proposed amendment language allows for BLM to grant exceptions where resource conflicts could not be mitigated or avoided within the new utility corridor. Details on areas of resource conflict that may require such exceptions are listed in Section 4.4.5 and discussed in the associated impact analysis. Plan amendments are only proposed where the reference line would conflict with resources present to facilitate future micro-siting in areas of resource conflict or access roads and laydown area locations. Since the resources listed in the comment--fragile soils/slopes and the two ACECs--occur in the 2-mile wide corridor and not crossed by the reference line in the Draft EIS, plan amendments are not proposed in these areas since they could be avoided through siting. See the analysis and mitigation proposed in Sections 3.3 (S-7) and 3.15 (SDA-1,-2,-3) that would avoid or minimize conflicts in these areas. No changes made to document.
Buckner, Kelly	104-34	Page 4-48 to 4-49: Text says that amendments would be required in Alternatives A-F for air quality for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for air quality. Text discloses the impacts to air quality from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-35	Page 4-49 to 4-52: Text says that amendments would be required in Alternatives A-F for paleontology for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for paleontological resources. Text discloses the impacts to paleontological resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-36	Page 4-53 to 4-56: Text says that amendments would be required in Alternatives A-F for mineral resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for mineral resources. Text discloses the impacts to mineral resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-37	Page 4-57 to 4-40: Text says that amendments would be required in Alternatives A-F for soil resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for soil resources. Text discloses the impacts to soil resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-38	Page 4-61 to 4-64: Text says that amendments would be required in Alternatives A-F for water resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for water resources. Text discloses the impacts to water resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-39	Page 4-65 to 4-69: Text says that amendments would be required in Alternatives A-F for vegetation resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for vegetation resources. Text discloses the impacts to vegetation resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-40	Page 4-70 to 4-72: Text says that amendments would be required in Alternatives A-F for forest management resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for forest management resources. Text discloses the impacts to forest management resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-41	Page 4-72 to 4-76: Text says that amendments would be required in Alternatives A-F for fire and fuels management resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for fire and fuels management resources. Text discloses the impacts to fire and fuels management from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-42	Page 4-76 to 4-82: Text says that amendments would be required in Alternatives A-F for special status plant resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for special status plant resources. Text discloses the impacts to special status plants from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-43	Page 4-83 to 4-88: Text says that amendments would be required in Alternatives A-F for wildlife resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for wildlife resources. Text discloses the impacts to wildlife from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-44	Page 4-88 to 4-95: Text says that amendments would be required in Alternatives A-F for special status wildlife resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for wildlife resources. Text discloses the impacts to wildlife from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-45	Page 4-96 to 4-104: Text says that amendments would be required in Alternatives A-F for special status aquatic resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for special status aquatic species. Text discloses the impacts to special status aquatic species from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-46	Page 4-104 to 4-108: Text says that amendments would be required in Alternatives A-F for cultural resources and Native American concerns for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for cultural resources and Native American concerns. Text discloses the impacts to cultural resources and Native American concerns from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-47	Page 4-108 to 4-114: Text says that amendments would be required in Alternatives A-F for visual resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for visual resources. Text discloses the impacts to visual resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Buckner, Kelly	104-48	Page 4-114 to 4-120: Text says that amendments would be required in Alternatives A-F for recreation resources for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for recreational resources. Text discloses the impacts to recreational resources from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO.
Buckner, Kelly	104-49	page 4-114 to 4-120: This section is also incorrect to state that the only recreation affected is with dispersed camping. The Nine Mile SRMA is impacted by some of the alternative routes.	The Nine Mile SRMA occurs adjacent to the existing RMP-designated utility corridor that is not being amended in the Chapter. Section 3.13 discloses impacts to all recreation resources along the corridor length. No changes made to document.
Buckner, Kelly	104-50	Page 4-114 to 4-120: Also, crossing there may be a management conflict for Desolation Canyon per the 1979 Green River Management Plan.	Section 3.13 discloses impacts to all recreation resources along length of the Project. Chapter 4 only discloses impacts associated with the new utility corridor proposed in the amendment. No changes made to document.
Buckner, Kelly	104-51	Page 4-121 to 4-125: Text says that amendments would be required in Alternatives A-F for lands and realty for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for lands and realty. Text discloses the impacts to lands and realty from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-52	Page 4-129 to 4-131: Text says that amendments would be required in Alternatives A-F for special designation and management areas for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for special designation and management areas on these pages. The section discloses the impacts to special designation and management areas from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-53	Page 4-129 to 4-131: Only the Lower Green River ACEC is mentioned in Alternative D but says nothing about the Lower Green River WSR.	The Lower Green River WSR would be crossed in an existing RMP-designated utility corridor that is not being amended in the Chapter 4 of the Draft EIS; however, more recent direction received from the BLM since then indicates that an amendment is needed for the WSR in the Final EIS. This information has been incorporated and analyzed in the Final EIS. Section 3.15 also discloses impacts to WSRs from the Project along the corridor length.
Buckner, Kelly	104-54	Page 4-132 to 4-133: Text says that amendments would be required in Alternatives B-F for transportation access for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for transportation. Text discloses the impacts to transportation from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-55	Page 4-133 to 4-134: Text says that amendments would be required in Alternatives A-F for socioeconomics for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for socioeconomics. Text discloses the impacts to socioeconomics from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-56	Page 4-134 to 4-136: Text says that amendments would be required in Alternatives A-F for public health and safety for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for public health and safety. Text discloses the impacts to public health and safety from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-57	Page 4-136 to 4-139: Text says that amendments would be required in Alternatives A-F for herd management areas for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for herd management areas. Text discloses the impacts to herd management areas from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Buckner, Kelly	104-58	Page 4-136 to 4-139: The leading paragraph to this section first says that an amendment would be needed but then the VFO section sort of correctly states that the Bonanza area is outside the corridor. I think you mean Hill Creek HA and only applies to Alternative B.	The proposed plan amendment being discussed is for the area north of the Bonanza HA near the state line. The Hill Creek HA would be affected by amendment proposed in Alternatives D and F, and impacts are disclosed for those alternatives.
Buckner, Kelly	104-59	Page 4-136 to 4-139: For the VFO, we have only Herd Areas; we have no HMAs.	Text has been corrected to reflect "Herd Areas" in the VFO.
Buckner, Kelly	104-60	Page 4-139 to end: For Moab, Price, and Vernal Foes, lands with wilderness character should be re-named as BLM Natural Areas.	Lands with wilderness characteristics units located within the Moab, Price, and Vernal Field Offices have been updated and referred to as BLM Natural Areas as requested.
Buckner, Kelly	104-61	Where are riparian and wetland resources discussed?	Riparian and wetland resources are discussed in Section 4.5.5 Vegetation.
Buckner, Kelly	104-62	The biggest fatal flaw is not to acknowledge the connected action of the wind farm/solar farm where the electricity is being generated. The Utah NEPA Guidebook clearly states "Care should be taken to ensure that reasonable foreseeable connected actions have been identified and not improperly segmented from the analysis."	Actions are connected if they automatically trigger other actions that may require an EIS; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(i, ii, iii)). As described in Section 2.1.1 of the Draft EIS, none of existing and/or reasonably foreseeable energy source projects in Wyoming are exclusively dependent upon this proposed transmission line, nor is this transmission line dependent exclusively on any of those projects, and are therefore not connected actions to this transmission line. Cumulative impacts, if applicable, from past, present and reasonably foreseeable projects are disclosed in Chapter 5.0 of the Draft EIS.
Buckner, Kelly	104-63	Also, "Connected actions are limited to actions that are currently proposed (ripe for decision). Actions that are not yet proposed are not connected actions, but may need to be analyzed as cumulative actions in the cumulative effects analysis if they are reasonably foreseeable."	Cumulative impacts, if applicable, from past, present, and reasonably foreseeable actions, including proposed wind projects, are disclosed in Chapter 5.0 of the Draft EIS (see Table 5-2 of the Draft EIS, which discusses the Chokecherry Sierra Madre Wind Energy Project). As noted on page 5-1 of the Draft EIS, the TransWest analysis has incorporated by reference the cumulative impacts analysis contained in the Chokecherry Sierra Madre Wind Energy Project Final EIS.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Buckner, Kelly	104-64	I don't know how you can ignore the "connected" action of the wind farm from the transmission line. The sole purpose of the line is to carry the electricity that the wind farm will generate. The one project would have no reason to exist without the other. In fact, doing the transmission line project may be premature if the wind farm is yet to be constructed.	Actions are connected if they automatically trigger other actions that may require an EIS; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(i, ii, iii)). As described in Section 2.1.1 of the Draft EIS, none of existing and/or reasonably foreseeable energy source projects in Wyoming are exclusively dependent upon this proposed transmission line, nor is this transmission line dependent exclusively on any of those projects, and are therefore not connected actions to this transmission line. Cumulative impacts, if applicable, from past, present and reasonably foreseeable projects are disclosed in Chapter 5.0 of the Draft EIS.
Buckner, Kelly	104-65	What about the connected attention of connecting to the IPP facility in Millard County?	As described in Section 2.1.2.1 and 2.1.2.2 of the Draft EIS, TransWest has included an option to connect to the existing IPP substation in Millard County. These design options are analyzed in each resource section of the Draft EIS.
Buckner, Kelly	104-66	I still have not heard a reasonable answer as to why TWE, Gateway South, and the Zephyr project can't use the same towers to hang their power lines. It is interesting that at first it was claimed that the lines had to be mile apart from one another. Later the distance was cut to 250 feet(?). If this is so, why then are there sections where the TWE and Gateway South lines actually cross over one another? If so, doesn't this fact just invalidate the whole idea that the lines have to keep a certain distance from one another?	Project implementation using common tower structures with other projects was considered but eliminated from further detailed analyses; discussion was added to Section 2.7 of the Final EIS to clarify why this was eliminated.
Buckner, Kelly	104-67	Later on, the new explanation was that there was a concern of what would happen if there was a system failure, but wouldn't the risk be the same regardless of whether lines were of separate towers or not? If the risk is that high, aren't there engineering measures that can reduce this risk to near zero? Aren't there lots of other examples in the country where high voltage lines share the same towers, crossover one another, etc.?	Project implementation using common tower structures with other projects was considered but eliminated from further detailed analyses; discussion was added to Section 2.7 of the Final EIS to clarify why this was eliminated.
Buckner, Kelly	104-68	capitalize "County" when it is used as a proper name	Text has been revised to address this comment as appropriate.
Buckner, Kelly	104-69	Page 4-126 to 4-128: Text says that amendments would be required in Alternatives A-F for livestock grazing for the VFO but never says what the language would be for each alternative, nor does it indicate which management decisions would be modified or if new decisions would be added.	No plan amendments are proposed for livestock grazing. Text discloses the impacts to livestock grazing from the proposed plan amendments. The proposed plan amendments, including the plan amendment language for each alternative, are detailed in Section 4.4.5 for the VFO. No changes made to document.
Bureau of Reclamation	690-1880	1. Volume 2, Page 3.11-7, Paragraph 3: This section heavily references Fowler and Madsen (1986) for regional cultural history and historic contexts. There is a recently published prehistoric context for southern Nevada by Roberts and Ahlstrom (2012); it is available from cultural resource staff within southern Nevada's Federal agencies and from the Nevada State Historic Preservation Office website. It is highly recommended that this study be used to help evaluate sites identified/studied during the subsequent Class III cultural resource work for the Trans West Express Transmission Project. The reference is: Roberts, Heidi, and Richard V.N. Ahlstrom. 2012. A Prehistoric Context for Southern Nevada. HRA, Inc., Archaeological Report No. 11-05	The text in Section 3.11.4.1 describing the prehistoric context for southern Nevada has been revised and updated using the recently published document recommended by the commenter.
Bureau of Reclamation	690-1881	2. Volume 3, Page 3.14-28, Paragraph 1. Several Southern Nevada Water Authority (SNWA) water lines and other underground water delivery infrastructure, a City of Henderson Waste Water Treatment Plant and associated underground lines, a City of Henderson C-1 Detention Basin, and joint SNW A/Nevada Energy/Colorado River Commission power lines are all located on Reclamation land within Alternative A. There are also numerous other gas, water, and other municipal utility lines located on the Reclamation land. As a resource for refining Alternative IV -A we recommend contacting SNWA to obtain shape files of SNWA's facilities, the City of Henderson regarding the Water Treatment Plant and the Northeast C-1 Detention basin, SNWA/Nevada Energy/Colorado River Commission, and other others who hold prior rights of use on Reclamation land for shape files of their facilities. Early coordination with the organizations listed above is critical, since if Reclamation approves a Record of Decision, we would need their concurrence prior to issuing a right of use for Trans West Express.	The organizations you suggest have or are being coordinated with by TransWest and the lead agencies. The results of this coordination will be used in combination with information on resource constraints to develop the final engineered alignment for the TWE Project.
Burnett, Bruce	602-837	Mountain Meadows is a National Historic Landmark (NHL) and listed on the National Register of Historic Places. As such, the area should be protected against any and all construction on it. In addition, the visual impact on the NHL would be irreversible and irretrievable and does not meet the guidelines set down in the Section 106 process by the Advisory Council on Historic Preservation (Bureau of Land Management).	In terms of construction disturbance, none of the alternatives would cross the Mountain Meadows National Historic Landmark. In terms of visual impacts, Alternative III-A is the closest of the alternatives and is located approximately 1 mile from the Landmark. The other alternatives are located more than 28 miles away. At this time, the final route selected by the agencies will be presented in the Record of Decision.
Burrows, Claire	597-807	thank the BLM for their hard work on this project because I know Environmental Impact Statements can be very involved, but its important to take the time to consider all aspects of the project and their impact on our state.	Thank you for your comment.
Carbon County Economic Development Corp.	721-1340	The Final EIS should be updated to include more information about the significant property tax payments that will be made in Carbon County throughout the project's life, estimated by TransWest to equate to millions of dollars going to support a range of county services and budgets.	Additional discussion of the estimated tax revenues, provided by TransWest, was included in Section 3.17.5.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Carbon County Economic Development Corp.	721-1341	we understand this project has been designated by the president and nine federal agencies as a "Rapid Response Team for Transmission" project. The draft EIS clearly has been researched and prepared with a great deal of detail and thought, and is near final. In the spirit of the Rapid Response designation, we ask that you expedite efforts to complete the EIS quickly and responsibly so that rights-of-ways can be granted and construction can begin, creating much needed jobs and economic development for Carbon County. We also know this transmission line will help promote additional electric generation projects (like wind energy projects) in our state because it provides new infrastructure for getting otherwise stranded power to key markets.	Thank you for your comment.
Carbon County Wyoming Comm, Chairman	591-854	The criteria and parameters listed in the DEIS at Section 2.8.1, used by the BLM to guide the selection of the agency preferred alternative simply do not support the BLM's choice of Alternative I-D over the Consensus Route, Alternative I-A.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Carbon County Wyoming Commissioner	167-216	The criteria and parameters listed in the DEIS at Section 2.8.1, used by the BLM to guide the selection of the agency preferred alternative simply do not support the BLM's choice of Alternative 1-D over the Consensus Route, Alternative 1-A	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Chavira, April	230-251	I'd like to quickly and simply make a request that the BLM and TransWest Express remove the Highway 13 Corridor Route I-C from consideration for the Transmission Line. For those living along this corridor, the placement of the line here would be an absolute disaster to the gorgeous views residents have enjoyed for years while impacting more private land. Plus, we know that not only are there alternatives, but many of the alternatives (including the primary route supported by TWE) can be placed in existing corridors with minimal interference.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Alternative I-C has been retained for further analyses and consideration as it provides an alternative to address resource concerns associated with other routes being considered, particularly impacts to Forest Service inventoried roadless areas. For details on the relative impacts of the alternatives see Chapter 3 of the Final EIS.
Chevron North America	182-538	Several of the proposed routes for alternate routes for the transmission line cross or pass near Chevron assets. I've attached a map depicting the routes and the location of Chevron leasehold and fee properties. The infrastructure in and around Chevron's properties include production facilities, tanks, pipelines, power lines, and field offices.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Due to the thousands of miles of alternatives, it is not feasible to analyze all of the claims and leases for validity or potential commerciality, or mitigate for all possible situations that may arise with regard to resource conflicts. It is also not possible for the BLM to dictate the terms and conditions in agreements between the applicant and mineral owners or lessees. The BLM will issue a ROW grant that is consistent with applicable regulations but recognizes that the applicant must acquire all access permissions in mixed ownership situations and it is expected that mineral rights conflicts would be resolved prior to construction. The proposed transmission line, when constructed, will occupy a 250-foot wide ROW. The 250-foot wide ROW should facilitate resolution of many perceived conflicts. The terms and conditions of the ROW grant, as specified in 43 CFR Subpart 2801, includes "the right [of the BLM] to require common use of the right-of-way, and the right to authorize use of the right-of-way for compatible uses (including the subsurface and air space)." The BLM recognizes that subsurface activities (in this case, mineral extraction) may not in all cases be compatible with the intended ROW use but as stated above, potential conflicts must be resolved prior to construction. It also should be noted that although many unpatented mining claims have dubious validity, it is the responsibility of the ROW grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners.
Chevron North America	182-539	There is also a public airport near Chevron's Rangely field that could be affected by the transmission line.	The Rangely Airport was identified and evaluated in Section 3.16.6.4.
Chevron North America	182-540	Chevron request significant notice prior to construction in which to identify the specific location of its facilities and assets in the path of the transmission line.	Coordination by TransWest with right-of-way holders is currently ongoing and will continue. Additionally, all right-of-way holders whose right-of-ways will be crossed by the route chosen by the agencies will be notified and consulted with prior to construction.
Church of Jesus Christ Latter-day Saints	684-877	First, we wish to commend the BLM for its tremendous efforts in compiling this impressive document. It is a well-organized and well-written comprehensive analysis of the diverse cultural and natural resources within the proposed Project boundaries. It will undoubtedly serve as an example for other environmental impact statements in the future	Thank you for your comment.
Church of Jesus Christ Latter-day Saints	684-879	The physical remains of the victims of the Mountain Meadows Massacre are located in unmarked graves throughout the Mountain Meadows. Although one of the mass graves, containing the bones of 29 of the 120 victims, was accidentally unearthed in 1999 during the construction of a monument at the site, several other similar graves are somewhere else in the valley. Unfortunately, although historical records document the existence of these burials, they do not indicate their exact location, making the entire valley a sacred and archeologically sensitive place. Any construction activities in this area run the risk of disturbing the graves of these massacre victims.	Thank you for relaying these concerns. The agencies are aware of the unmarked graves in the vicinity of Mountain Meadows and potential impacts associated with any construction through this area have been disclosed in Section 3.11.6.5.
Church of Jesus Christ Latter-day Saints	684-881	Page 3.11-2-The name of the Church is inaccurately printed at the bottom of this page. We would prefer that the correct name of the Church be used, which is The Church of Jesus Christ of Latter-day Saints.	Text in Section 3.11.1.1 has been revised per the comment.
Church of Jesus Christ Latter-day Saints	684-882	Page 3.11-2-Another group's name is similarly misprinted on the bottom of this page. The group's official name is the Mountain Meadows Massacre Descendants, not the Mountain Meadows Descendants.	Text in Section 3.11.1.1 has been revised per the comment.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Church of Jesus Christ Latter-day Saints	684-883	Page 3.11-9-The language used to describe the Mountain Meadows Massacre in the penultimate paragraph of page 3.11-9 could be more historically accurate. Specifically, we recommend that the second sentence of that paragraph read as follows: "The District is the location of the September 11, 1857, massacre of 120 emigrants by Southern Utah settlers and some Paiute Indians under the direction of local Mormon leaders."	The text in Section 3.11.4.2 was revised per the comment.
Church of Jesus Christ Latter-day Saints	684-884	Tables 3.11-2 and 3.11-3 (pages 3.11-14.15)-Both of these tables have a zero recorded under the "Listed" column for Region III in Utah. It is our understanding that the Mountain Meadows Massacre National Register District is listed on the NRHP. If this is correct, we feel that these two tables should reflect as much.	Table 3.11-2 (sites within the files search area) has been revised based on the comment. No change has been made to Table 3.11-2 (sites within the 250-foot ROW) because the Mountain Meadows Massacre Site and Mountain Meadows NHL are not within the transmission line ROW.
Church of Jesus Christ Latter-day Saints	684-885	Section 3.15.3.8 (page 3.15-28)-There are inaccuracies in this paragraph that need to be corrected. First of all, for the sake of historical accuracy, we recommend that the second sentence read as follows: "This NHL marks where 120 emigrants, most of them from Arkansas, were massacred by Southern Utah settlers and some Paiute Indians under the direction of local Mormon leaders." Second, the third sentence of this paragraph incorrectly states that "The landmark and district is managed by the USFS." Although the USFS does indeed manage a portion of the district and the National Historic Landmark, the Church owns and manages a significant portion of both.	Section 3.15.3.8 of the Final EIS was updated to include the historical and NHL management information supplied by the commenter.
Church of Jesus Christ Latter-day Saints	684-886	Section 3.11.2 (page 3.11-5)-In this section it is not clearly stated whether the cultural resource files search was conducted for the Applicant-preferred alternative, the Agency-preferred alternative, another alternative, some combination of the three, or all of the above. It would be helpful to modify the language to clarify which alternatives were the subject of the file search.	No change. Sections 3.11.2 and 3.11.3 of the DEIS provide a description of what was included in the files search area, which encompassed "a 2-mile-wide corridor along each alternative."
Church of Jesus Christ Latter-day Saints	684-887	Section 3.11.5 (page 3.11-14)-Here too it is not clear which alternatives are represented by the accompanying text and table. We assume the information presented here represents data from all proposed alternatives, but this is not clearly stated anywhere in this section.	The text in Section 3.11.5 has been revised to provide clarification.
Church of Jesus Christ Latter-day Saints	684-888	Section 3.11.4.2 (page 3.11-10) -Although this section is about "Historic Resources," the last paragraph discusses various prehistoric sites. It seems this information belongs instead in section 3.11.4.1, which discusses "Prehistoric Resources."	The text has been moved to Section 3.11.4.1 "Prehistoric Resources."
Citizens for Dixie's Future	569-1314	Overall, we were very encouraged by how well both the initial scoping and the DEIS meetings were conducted. At both, BLM employees and TransWest Express employees at several stations greeted us. All were very friendly, knowledgeable, and open to our comments and concerns. The pictures, charts, and other descriptive materials were very clear and quite appropriate. You are to be congratulated for making such good efforts to hear public comments and to provide information.	Thank you for your comment.
Citizens for Dixie's Future	569-1315	Please note that we would view any change to alternating current or change away from renewable energy (wind) sources as negative.	Your support for DC lines and renewable energy sources is noted.
Citizens for Dixie's Future	569-1318	It should also be mentioned that a number of older people, many retirees, own property in the area from Enterprise, Utah, south to Veyo, Utah. They live where they do for the visual and other amenities in the rural area. Any proposed transmission line will harm their perceived quality of life. Some of these people have limited financial resources.	Section 3.12 describes the effects of the transmission line on visual resources. The text in Section 3.17 has been revised to disclose that the visual appearance of the transmission line on the landscape may be perceived by some residents, outdoor enthusiasts, and travelers through an area in which the line is visible as adversely affecting their quality of life or outdoor/travel experience.
Citizens for Dixie's Future	569-1319	We respectfully disagree that the social economic effects would be very limited due to the rural nature of most of the transmission line's right-of-way. Depending upon the route selected, there are many small private properties in communities such as Central, Dixie Deer, Pine Valley, Brookside, and Veyo of less than five acres, many less than one acre, which could be affected. Values remain much less than they once were following the "Great Recession" and the public is legitimately fearful of losing more of their property's worth.	The section referred to in the comment applies specifically to the subject of the potential effect on real estate values and it was intended as a relative conclusion as compared to potential effects in more densely developed areas. Other portions of that section note that many other factors contribute to real estate values, including overall market conditions. Section 3.14 addresses effects on land use, including characterization of agricultural, residential and other private land use in close proximity to the transmission line reference lines. With no intent to diminish the importance and value of a residence to the individual owner or inhabitant, the number of properties is relatively low. Minor text revisions were made to the conclusion statement in Section 3.17.5 regarding the potential effects of transmission line location on real estate values.
Citizens for Dixie's Future	569-1321	The Mojave desert tortoise, a species federally listed as threatened, and its habitat, including some federally designated critical habitat, is found in the southwest portion of Washington County and it is unclear how the proposed transmission line would cross desert tortoise habitat. It is also unclear what seasonal construction, as well as operational constraints and tortoise protective maintenance stipulations would be imposed on the right-of-way holder if this alternative were to be chosen.	Comment noted. The applicant has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures as discussed in Applicant Committed Measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Requirements for seasonal timing of construction within desert tortoise habitat are commonly outlined in the terms and conditions of the official USFWS Biological Opinion resulting from Section 7 consultations. Nevertheless, additional desert tortoise mitigation measures have been added to mitigation measure SSWS-4 (Section 3.8.6 and Appendix C, Table C.5-1) in the Final EIS.
Citizens for Dixie's Future	569-1322	As was noted in the recent 38th Annual Meeting and Symposium of the Desert Tortoise Council (Las Vegas, NV, Feb. 15-17, 2013), common raven predation on desert tortoises is a well recognized threat to the long-term survival of the species in the Mojave Desert. Raven populations are reportedly increasing in the area. During construction and maintenance activity of the proposed transmission line, garbage and food would attract ravens, and these attractants need to be kept covered and disposed of properly in order to keep ravens from concentrating in desert tortoise habitat.	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization or mitigation measures as discussed in Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Furthermore, TWE-61 outlines the applicant's commitment to develop a Construction, Operations, and Maintenance Plan that outlines the management of construction-related trash and waste items. Refer also to proposed mitigation SSWS-4.14 in Section 3.8.6 and Appendix C, Table C.5-1 of the Final EIS, which would require development of a raven management plan designed to minimize raven depredation of desert tortoise.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Citizens for Dixie's Future	569-1323	Additionally, within tortoise habitat, power poles provide handy perching and nesting sites for ravens from which they can readily spot tortoise below. To protect federally listed desert tortoises in the vicinity of the proposed transmission line, if built, we suggest when ravens build nests on the line towers or other structures, that these nests be removed as soon as possible. In addition, if it is feasible, towers and other structures should be equipped with anti-raven nesting and perching devices.	Monitoring for and removal of raven nests in desert tortoise habitats has been added to mitigation measure SSWS-4 in the Final EIS and is being considered as a potential mitigation/conservation measure for desert tortoise in the BA.
Citizens for Dixie's Future	569-1325	The spread of avian cholera through waterfowl and other migratory bird populations is enhanced by the gregarious nature of most waterfowl and shore bird species. Wherever this proposed transmission line is near or crosses wetlands where waterfowl and other avian species may concentrate, birds may collide with the electrical conductors and die. Dead birds in water tend to cause outbreaks of this disease. Early detection of avian cholera outbreaks is the first line of defense against this fatal disease. Therefore, it is important to include frequent surveillance for dead and decaying bird carcasses. Control actions need to be focused upon minimizing exposure of migratory and scavenger bird species.	Thank you for your comment. Line marking to reduce collision risk where the Project would traverse BHCAs and IBAs and design of the project in accordance with APLIC 2012 guidelines have been identified as additional mitigation in the Final EIS. Period avian mortality monitoring and reporting are typically covered in avian protection plans. An APP is being prepared for the Project and a draft APP has been included in the current POD.
Citizens for Dixie's Future	569-1326	It is also unclear exactly where the proposed line would come off the scenic cliffs along the northern boundaries of the town of Ivins, Utah, and the Shivwits Reservation, west of Snow Canyon State Park and the Red Mountain designated wilderness. The Reservation, Red Mountain, and the cliffs themselves north of Highway 91 have extremely scenic values. Tourism is a huge economic factor in southern Utah and is a major sector of our economy. Thousands of people come here just to enjoy our scenic vistas. A surprising number wind up staying and buying a place here to live so they can continue to enjoy the natural beauty. Any project that jeopardizes the natural beauty of this area also jeopardizes the tourism and home construction industries, which are our two main stays. If the applicant proposed route is selected, its impact to the scenic views along Highway 91 must be carefully mitigated.	The Appendix I maps show in both large and detailed scales the location of the Project in the areas in question. Eg. Figure I-1, Map 8 of 8 or Figure I-15, Map 8 of 8.
Citizens for Dixie's Future	569-1327	the Public Health and Safety section is inadequate because it does not address wildland fire fighter safety in proximity to a potentially 500 KV direct current electrical transmission line in enough detail. Fire activity near high voltage electrical transmission lines can cause multiple hazards, which can electrocute or seriously injure firefighters.	We certainly can appreciate your concerns about wildland fire in remote areas. For this project, a Fire Protection Plan (DF-64) would be implemented to reduce the risk of fire near the transmission line. Furthermore, stray voltage and induced current are not produced by the type of EMF from DC transmission lines; however, to reduce the risk of shock and fire, necessary mitigation would be applied to eliminate effects related to induced currents and voltages on conductive objects sharing the transmission line ROW (DF-52). The transmission line would also be engineered to meet North American Electric Reliability standards and National Electric Safety Code. Additional information on wildland fire has been presented in Section 3.21 of the Final EIS. Additionally, in the event the lines are cut or otherwise downed, the lines are designed to trip out of service (turn off), reducing the chances of fire.
Citizens for Dixie's Future	569-1328	We strongly oppose the applicant preferred route location, especially the Pinto Alternative Route that would bisect the road between Central and Pine Valley. The DEIS is also inadequate because it did not really discuss the fact that the Pine Valley Road is narrow and is the only paved access to and from Pine Valley. On a summer holiday weekend over 3000 people can be found in the town of Pine Valley and on the nearby Dixie National Forest, including the Pine Valley picnic and camping areas. The public would be trying to evacuate in one direction while at the same time the fire fighting forces would be coming in from the opposite direction. In a fire emergency, this road could easily become blocked.	See response to Comment ID 569-1327.
Citizens for Dixie's Future	569-1329	The DEIS comment that the project potentially pose safety hazards to fire fighters is a gross understatement. During a fire near high voltage transmission lines particulate matter in the smoke can transmit fatal electrical charges to firefighters. Water sprayed directly onto charged conductor lines can also transmit deadly electricity back to the firemen holding the hose nozzles. Smoke from a fire can obscure transmission lines from pilots of low flying helicopters and fixed wing aircraft that are fighting the fire. Heavy smoke and flames can cause arcs to the ground from electrical conductors.	See response to Comment ID 569-1327.
Citizens for Dixie's Future	569-1330	While we do not have expertise in electrical engineering, we understand that under certain conditions one electrically charged transmission line can arc to another nearby transmission line and such arcing can potentially lead to igniting a wildfire. Wildfires are probably the major cause of habitat and forage loss in this county. We are concerned that with a total power line right-of-way width of 250 feet that this power line may be too close to another power line with a similar width right-of-way. We know lines are not always strung in the center of their respective rights-of-way and we realize that the 250 foot width is a BLM standard. Therefore, we suggest that the right-of-way be granted in such a manner as to maximize separation distance between this proposed transmission line and any other existing power lines. The area near the Beaver Dam National Conservation Area is of particular concern to us because of the extensive cheat grass fuels and the existing high voltage power line.	See response to Comment ID 569-1327.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Citizens for Dixie's Future	569-1331	In addition, cheatgrass increases resulting from construction disturbance of the route of the transmission line by themselves increase the risk of fire occurrence. In most of the piñon-juniper type between Central and Pine Valley, there is no existing good access for firefighters to get to a fire along the proposed line.	A separate section on wildfire was added to the Final EIS as Section 3-21. Additional detail on wildland fire effects was added to the Final EIS as appropriate to wildlife, visual, public health and safety, and cumulative impacts. A fire protection plan will be developed as part of TransWest's Construction, Operation, and Maintenance Plan. As appropriate, specific requirements of the fire protection plan were outlined as mitigation in the wildfire section. See Appendix D, part 1 and 2 of the Final EIS for TWE's committed environmental mitigation measures related to fire protection (No-64).
Citizens for Dixie's Future	569-1332	Over 25% of the land in Washington County has burned in the last ten years, some more than once. Most were caused by lightning. The increase in fire frequency, fire size, and fire severity in this area is troubling. There is little question during the life expectancy of this project, large fires will occur somewhere along this line. The question which the DEIS should have analyzed is "does merely building a transmission line in a mountain forest increase the risk of wildfires?" Do the towers or the conductor lines themselves increase the number of lightning strikes?	See response to Comment ID 569-1331.
Citizens for Dixie's Future	569-1333	One other firefighting consideration is that the initial firefighters, who would likely respond to a fire along the line, if built, are volunteer firefighters from Pine Valley, Veyo, Central and the other small local communities. Most of the volunteers are older retired folks, and it could be several hours before a sizeable force of paid and fit properly equipped federal wildland firefighters, as well as air support, would arrive.	See response to Comment ID 569-1331.
Citizens for Dixie's Future	569-1334	In most cases, a primitive track will be made along the power line right-of-way and is necessary for maintenance. Unfortunately, efforts to block unauthorized access to this maintenance road usually fail and all manner of dirt bikes, four wheelers, and four-wheel drive vehicles will drive along the power line. Public access into new areas by this maintenance road will likely lead to wildlife disturbance, poaching, illegal woodcutting, and vandalism. A maintenance road used by the public will also lead to increased erosion, establishment of fire prone cheatgrass, and illegal campfires in the area.	The Land Use, Recreation, Transportation and Access sections of the EIS (and other sections) identify the potential for the Proposed Action to expand the existing roadway network and identify potential effects on public and private lands that would occur from roadway use and construction. These discussions address the potential for incrementally increasing unauthorized access, describe related adverse effects and identify existing commitment, Best Management Practices and mitigation, as appropriate. Section 3.16.6 identifies a variety of existing commitments and Best Management Practices to keep traffic on the authorized roadway network.
Citizens for Dixie's Future	569-1335	One very significant apparent omission on the list of federally listed species that may be found in the area is the California condor, an endangered species, and the bird with the widest wingspan of any flying bird in North American (9.5 feet). California condors were re-introduced to northern Arizona on December 12, 1996, and have expanded into southern Utah. This condor population is expected to continue to grow and to become more widely distributed. Currently a number of condors are regularly found in Zion National Park and these birds can readily fly 100 miles in a day. They have been in Washington County many times, including in Hurricane, Ivins, St. George, and a few miles east of New Harmony. There is no reason they could not be found on occasion near Pine Valley or Central. This document needs to specifically reassure the public that the electrical conductors and other charged equipment and insulators will be at least ten (10) feet apart in order to avoid possible electrocution of California condors.	Information regarding California Condor is presented in DEIS Section 3.8.5.8 Region III. Information regarding distances between charged components is provided in Appendix D - Project Technical Description Report (PTDR). Furthermore, according to the PDTR, the only TWE component that could have charged equipment spaced at less than 10 feet apart would be the overhead distribution lines associated with the ground electrode beds. No ground electrode bed siting areas are located within the current range of the condor, making the potential for electrocution negligible. TransWest has also committed to designing and constructing the entire project consistent with the suggested practices outlined in APLIC 2006. No change to text.
Citizens for Dixie's Future	569-1343	Finally, mitigation items, which are frequently added to transmission lines, are often at cross-purposes. For example, non-spectral conductors are often used to lessen visual impacts of electrical transmission lines, but also make the lines more difficult to see by biologists doing helicopter big game counts, law enforcement personnel looking for illegal crops, and firefighters being transported by helicopter to a fire. In another example, adding aviation safety balls to transmission lines sometimes makes the lines more visible when the goal should be to minimize the lines visibility on a distant horizon. Safety balls where a line crosses a roadway or maybe even a canyon are good, but please do not get carried away with mitigations measures where there is not a problem.	Comment noted. Mitigation proposed in the EIS results from a need identified in the impact analysis per CEQ regulations.
Citizens for Dixie's Future	569-1344	Overall, this DEIS document is well organized and relatively easy to follow. However, it seems some sections have more detail than other just as pertinent sections. From our standpoint, this document was almost too large to analyze and to make comments upon, but obviously, a tremendous amount of effort went into preparing this DEIS. All that were involved should be thanked for their effort.	Thank you for your comment.
City of Boulder City	615-923	First, the City notes that it is unaware of any "private" property within the Eldorado Valley that could potentially be impacted by the Southern Terminal or the TransWest project in general. All lands within the Eldorado Valley which were transferred to the City in the Eldorado Valley Transfer Act, P.L. 85-339 ("EVTA") (see Exhibit 1 hereto), are owned in fee by the City of Boulder City (the "Transfer Area"). The Transfer Area is approximately 107,400 acres and is reserved for a multi-species preserve, solar development and recreational activities. Thus, a major portion of the Region IV development of the Trans West project including, significantly, the Southern Terminal, is not "near Boulder City" (DEIS, ES-12), but rather, is within Boulder City limits. Accordingly, the multiple references throughout the DEIS to the location being near the City are incorrect and should be revised to reflect that any development within the Transfer Area is within city limits of Boulder City.	Within the EIS, jurisdiction has generally been identified through BLM geospatial data that defines federal entities and state/county-level jurisdiction, but considers the remaining types of ownership and jurisdiction as "private" lands. The Final EIS was corrected to indicate that the Southern Terminal location is within Boulder City limits.

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Commenter Name	Comment ID	Extracted Comment	Response
City of Boulder City	615-955	Second, the proposed alignment of the transmission line as it enters into Boulder City does not lie within an established transmission corridor as identified in the Resource Management Plan for the BLM nor within the reserved transmission corridors as identified under Federal Patent Nev-048100. (See, e.g., DEIS Figure 2-7.) The City has had multiple discussions with the local, state and federal BLM offices to resolve transmission line location reservations. The City has committed, and likewise received commitments from, the then-Director of the BLM Bob Abbey, current BLM Nevada State Director Amy Lueders, and the Las Vegas Field Office directors over the last three years to support and actively engage in the placement of transmission lines within the identified transmission corridors as shown within the above-mentioned Patent. The placement of the proposed DC transmission line well outside any identified and reserved transmission corridors is contrary to those commitments and directly impacts the City of Boulder City as both the political entity who controls the development of the land and as the private land owner who receives the benefits of any development of the land.	The Final EIS preliminary engineered alignments in the area of the City of Boulder City were refined in consideration of existing designated utility corridors and existing transmission infrastructure.
City of Boulder City	615-956	Placement of the transmission line outside of the established corridors creates great financial harm to the City as the fee owner of this land. The area identified within the City for the proposed DC transmission line (known as Township 23 Range 63, sections 19,30 and 31, as well as Township 24 Range 63 Sections 6 and 7 in the Mount Diablo Median, in the City of Boulder City, County of Clark, State of Nevada) have been identified as prime solar development areas. The City is known for as a solar development hub, providing much needed power to the southwest United States. Further, as the land owner, the City generates significant revenue from the lease of land for the development of solar energy facilities to operate its government.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach. The Final EIS preliminary engineered alignments in the area of the Southern Terminal were refined considering existing designated utility corridors and existing transmission infrastructure.
City of Boulder City	615-957	As the only city in the State of Nevada that does not permit gaming in any form, the City does not receive the gaming revenues enjoyed by other communities in the State and relies on land leases to replace that revenue. The DEIS at p. 1-14 suggests that Western Area Power Administration could there be an attempt to exercise such authority within City limits. The City is opposed to any efforts as proposed as an option in the DEIS to have land condemned by the federal government and then turned over to a private enterprise.	As noted in Section 1.6 of the Draft EIS, if it decides to participate in this Project, Western has committed to working with citizens and landowners to address any concerns regarding acquisition of any private lands required for Project implementation. Western views effective public involvement and engagement as a much more productive route than exercising eminent domain authority
City of Boulder City	615-958	In addition, the DEIS indicates that "[e]ach of the proposed BLM plan amendments would ... expand an existing utility corridor." (DEIS, ES-4.) While it does not appear to the City that a plan amendment expanding utility corridors within the City limits is contemplated in the DEIS, note that the City would oppose any such expansion of utility corridors within the City limits in the future. The City stands to lose not just tens of millions of dollars of operating capital, but hundreds of millions of dollars if the transmission line facilities are not located to the existing designated transmission corridors as identified in Federal Land Patent Ncv-0481 00 or to lands to the south and west of the existing transmission lines within that corridor.	Your concern is noted. This general statement in the executive summary only applies to areas where plan amendments are proposed for the Project to bring it into conformance. There are no plan amendments proposed in Nevada that would expand an existing utility corridor and, as such, there are no plan amendments proposed in the vicinity of Boulder City or Clark County.
City of Boulder City	615-959	As stated above, the Transfer Area is subject to several uses including, significantly, a multi-species preserve and solar facility development. The Project Corridor for the TransWest project identified in Figure 2-15 of the DEIS is an expansive area covering a significant portion of the Transfer Area. Boulder City believes that this designation of the Project Corridor is excessive and is a potential conflict with the uses for that area identified by the City.	The 2-mile project corridor described in the Draft EIS served to establish initial alternatives and identify resource and topographic constraints. This corridor was subsequently narrowed in the Final EIS and the final actual ROW that will be identified through the Record of Decision and the Plan of Development will be only 250 feet wide (See Chapter 2 of the Final EIS). Additionally, please note that on September 2013, TransWest requested an option to lease certain Boulder City lands within Boulder City's Annual Land Management Plan process. The Boulder City Council approved a change to their Land Management Plan (LMP) to accommodate TransWest's request in December 2013 (Resolution No. 6117). A change in the LMP was required to authorize the Boulder City Planning Department to initiate the leasing process. TransWest is currently working with the Boulder City Planning Department through this process.
City of Boulder City	615-960	By way of example, the transmission lines for the Techren Solar, LLC (Techren") solar facility cross a portion of TransWest's Southern Terminal Alternative as that alternative is identified in the DEIS (DEIS, Figure 2-17). TransWest has indicated that it has concerns over the placement of the Techren transmission lines over the Southern Terminal, thus articulating a conflict between the TransWest project and Techren, with whom the City has had a lease for this property since 2010. Trans West has attempted to ameliorate this conflict in a letter to the BLM dated September 27, 2013 (Exhibit 2 hereto), in which TransWest proposed to relocate the Southern Terminal to the south of its position as indicated in the DEIS, asserting that the repositioning of the Southern Terminal will provide a sufficient buffer between the approved Techren transmission line and TransWest's facilities. The newly Proposed TransWest Southern Terminal Site is illustrated in Exhibit C to TransWest's September 27 letter. The City supports TransWest's relocation of the Southern Terminal and requests, should the BLM approve the TransWest project, that it approve it with the relocation of the Southern Terminal as proposed in Exhibit C of Exhibit 1.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
City of Boulder City	615-961	While this attempt to alleviate the conflict with the Techren project is laudable, the City notes that additional conflicts with the City's interests and the interests of other leaseholders in the Eldorado Valley as the result of the expansive definition of the Project Corridor identified in Figure 2-15. The City requests that the Project Corridor be much more clearly defined and be confined to only those areas actually needed by the Trans West project and to areas not in conflict with City or leaseholder interests.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach. Using this approach, the Final EIS provides a more refined and narrowed project corridor in the area you refer to. The refinements to this corridor are based on the resource constraints identified during the Draft EIS process.
City of Boulder City	615-962	Further to this point, the City notes that TransWest docs not have a lease with the City, nor has TransWest engaged in anything more than very preliminary discussions regarding the potential for Trans West to lease land for its project from the City. Any negotiations between the City and TransWest and any grant of a leasehold to TransWest would by necessity take into consideration existing leasehold and other interests (such as the conservation easement lands) and could not, ultimately, conflict with any existing interest. As a "local government" (see DEIS, sec. 1.7.2), the City believes that TransWest has an obligation to do more consultation and coordination that it has to date, particularly since the City is the site of the proposed Southern Terminal.	The comment is noted. Coordination with right-of-way is ongoing. This comment has been forwarded to TransWest. The 2-mile project corridor described in the Draft EIS served to establish initial alternatives and identify resource and topographic constraints. This corridor was subsequently narrowed in the Final EIS and the final actual ROW that will be identified through the Record of Decision and the Plan of Development will be only 250 feet wide (See Chapter 2 of the Final EIS). Additionally, please note that on September 2013, TransWest requested an option to lease certain Boulder City lands within Boulder City's Annual Land Management Plan process. The Boulder City Council approved a change to their Land Management Plan (LMP) to accommodate TransWest's request in December 2013 (Resolution No. 6117). A change in the LMP was required to authorize the Boulder City Planning Department to initiate the leasing process. TransWest is currently working with the Boulder City Planning Department through this process.
City of Boulder City	615-963	The City is also concerned that there is not adequate discussion and provision of mitigation measures for how the proposed transmission line will dump extra power in the event of an emergency shutdown due to factors outside the control of the transmission line operator (such as a substation fire downstream that causes all circuits to be shutdown). Direct current transmission lines typically provide for large fields of electrodes placed into the ground to dump the extra power. It is not clear from the DEIS if such a large field will be placed near/within the substation area, nor what negative effects such a field will have on nearby facilities. There are many very sensitive facilities within a 5 mile radius of the proposed terminus and transmission line that could be significantly damaged in the event of a discharge of power into the ground. National infrastructure is at risk in the event that such a power dump creates an overload in other circuits if the power finds a route through the ground to such facilities.	The proposed and alternative southern ground electrode bed facilities are located approximately 50 miles north of the proposed Southern Terminal in an area west of Mesquite, NV. See Section 2.4.3.2 of the Final EIS.
City of Boulder City	615-964	Further, there are three significant underground natural gas pipelines that are immediately adjacent to the proposed terminus and within one mile of the transmission line. The DEIS does not address how such a facility would be impacted if there is a necessary discharge into the grounding field. The proposed transmission line is designed to carry up to 3GW of power to the various substations in the Eldorado Valley (Mead, Eldorado, Marketplace, McCullough). However, the existing outgoing transmission lines from those facilities do not have the capacity to carry the additional power, nor do the existing substations have the ability to receive it and process it for downstream delivery without taking existing utility providers off their systems.	The proposed and alternative southern ground electrode bed facilities are located approximately 50 miles north of the proposed Southern Terminal in an area west of Mesquite, NV. See Section 2.4.3.2 of the Final EIS. Section 3.14 of the Final EIS discloses the potential impacts of the ground electrode beds on surrounding land uses. TransWest's goals and objectives are stated in Section 1.3. Among others, their objective is to deliver renewably generated energy to markets in the desert southwest region. Part of their ROW application includes an option to construct an interconnect at the IPP station in Millard County, UT , which provides an alternate avenue to meet their objectives depending on market conditions. Furthermore, the proposed Southern Terminal in Nevada includes a 500kV substation along with the converter station. See Section 2.4.3.1.
City of Henderson	580-903	The City remains concerned about the potential negative impact of this routing of Alternative IV-A, where the proposed transmission line would pass between these two residential developments. Lake Las Vegas, a residential resort community, has experienced diminished property values, and near static growth, as a result of the economic downturn over the past several years, and only recently has begun to anticipate future growth within undeveloped areas of the resort over the next decade. Preliminary planning for an additional 275 homes within the resort has recently been submitted to the City. In addition, the 780 acre undeveloped northwestern tract of the resort area, Rainbow Canyon, was rezoned for residential and recreational development last year. Calico Ridge is an existing, largely built-out community with over 550 residences within the area of Segment 660 (DEIS Table 3.12-20).	Section 3.17.5.2. addresses the findings of research regarding the effect of transmission lines on property values. With regard to this specific location, the potential for incremental adverse effects would be tempered by the fact that three transmission lines already exist in the area; the primary access road into Lake Las Vegas crosses under the existing lines.
City of Henderson	580-904	While the DEIS indicates that the Project, as proposed under Alternative IV-A, would be generally aligned along existing transmission structures and located within a limited corridor width of 250 feet, it also notes that the "majority of Alternative IV -A would parallel existing transmission lines in valley situations, but sometimes is distanced enough to be on the opposite side of ridgelines." (DEIS Sec. 3.12-84). Moreover, the guyed transmission structures for this segment of the Project would maintain a larger profile in this viewshed area: " ... [the] substantially more dominant, self-supported structures would stand out visually more than they would if seen in the same viewshed with existing transmission line structures." (DEIS Sec. 3.12-84). The cumulative impact of the Agency-preferred alternative route has the very real potential to diminish scenic quality near these residential areas, and reduce land values and corresponding tax receipts.	The available research offers little insight on this issue. Consequently, the FEIS contains new text alluding to the potential for such effects but concludes that the likelihood, magnitude and geographical extent of such effects is unknown.

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Commenter Name	Comment ID	Extracted Comment	Response
City of Henderson	580-907	The City of Henderson has authority to protect the public health and welfare of its residents through local government land use, zoning, and planning requirements (see Henderson Municipal Code (HMC) Chapter 19.5, Use Regulations). A Conditional Use Permit from the City is required for major utility projects, including electrical transmission lines (HMC 19.5.4.S). While the City has not been identified as a cooperating agency during this EIS process, the City reserves its position in this regard	Table 3.14-24 of the Final EIS notes that major utilities would be a conditional use within the city of Henderson.
Clark County Nevada -Desert Conserv Prg	386-715	On page 3.14-81, under 3.14.6.6 Region IV, the paragraph is confusing, it deals with too many topics. This could be slightly expanded into three paragraphs. Check all Sections, Tables, and Figures cited in this paragraph.	The text in subsection 3.14.6.6 Region IV was modified by creating separate paragraphs to improve readability and citations were confirmed.
Clark County Nevada -Desert Conserv Prg	386-716	On Page 13, Project Description Technical Report, please change Multi-Species Habitat Conservation Easement to Clark County Desert Conservation Program's Boulder City Conservation Easement. Please search for all occurrences of Multi-Species Habitat Conservation and replace with Multiple Species Habitat Conservation.	The PDTR (Appendix D of DEIS) is TransWest's document that describes the proposed Project. This comment has been forwarded to TransWest to consider the suggested edit for inclusion in the Final EIS Plan of Development.
Clark County Nevada -Desert Conserv Prg	386-717	On page 33, under 3.2.2 Southern Terminal, the last paragraph is confusing. Please clarify the difference in acre totals for the Southern Terminal between private and BLM lands. Please check all acreages reported in this paragraph and throughout the document. (comment does not refer to correct page number and section)	Could not find specific location cited in comment, however, all acreages and totals have been checked and confirmed in the FEIS.
Clark County Nevada -Desert Conserv Prg	386-718	On Page 3.6-1, under 3.6.1 Regulatory Background, not sure if you want to add Clark County Multiple Species Habitat Conservation Plan and Southeastern Lincoln County Habitat Conservation Plan to the list of special status species regulations relevant to the Project. Same for Table 3.8-1.	The habitat conservation plans to which you refer apply to actions on non-federal lands. Whereas the TransWest Express Transmission Project would affect some non-federal lands in Lincoln and/or Clark Counties, because federal approval is required for project implementation, potential impacts to federally listed species are covered under section 7 of the ESA, rather than section 10 of the ESA to which the Clark County Multiple Species Habitat Conservation Plan and the Southeastern Lincoln County Habitat Conservation Plan apply.
Clark County Nevada -Desert Conserv Prg	386-719	On page 3.8-22, under 3.8.5.2 Proposed Alternative Southern Terminal, it states that the Southern Terminal would be sited almost entirely within the developed/disturbed vegetation community. The area in the proposed Southern Terminal Site is Mojave Desert Shrub vegetation community and is in Desert Tortoise habitat. This area is not developed or disturbed (See section 3.8, page 3.8-143).	According to the SWReGAP landcover data used in the vegetation analysis, the two Southern Terminal alternative sites are located primarily in the developed/disturbed vegetation type. No change to text.
Clark County Nevada -Desert Conserv Prg	386-720	On Table 3.8-9 does not show Desert Tortoise under Reptiles. However, it is clearly shown that the Terminal falls in Desert Tortoise habitat (Figure 3.8-6, Region IV Important Desert Tortoise Habitat).	FEIS has been modified to address comment.
Clark County Nevada -Desert Conserv Prg	386-721	On Table 3.8-17, BLM Sensitive and State-protected Species ... , need to add Desert Tortoise.	FEIS has been modified to address comment.
Clark County Nevada -Desert Conserv Prg	386-722	On page 3.5-30, under Southern Terminal Alternative, this section is confusing. Please check acres of impacts and redo vegetation analysis, see above and in general comments.	The vegetation description for Clark County is based on the Southwest ReGAP vegetation communities. In addition, the land use/vegetation at the Southern Terminal has been verified through aerial imagery and accounts supplied by the applicant. the section will be reworded to be clearer.
Clark County Nevada -Desert Conserv Prg	386-723	On page 3.13-29, Table 3.13-19, the BCCE could be included, also in Table 3.13-34.	A discussion of the BCCE was added to Table 3.13-19 in Section 3.13.5.4, Table 3.13-34 in Section 3.13.6.12, Figure 3.13-5, and into the impact text for the Southern Terminal in Section 3.13.6.7 and appropriate alternatives in Section 3.13.6.12.
Clark County Nevada -Desert Conserv Prg	386-724	On page 3.13-32, under Southern Terminal, it states that there is no public use of the private property within the proposed Southern Terminal area for recreation. It is understood OHV use is allowed within Boulder City on open roads, check with Boulder City.	It was confirmed with Boulder City that OHVs are allowed on city roads. The speed limit for OHVs is 25 mph and they are not allowed to kick up dust. Text was revised in Section 3.13.6.7.
Clark County Nevada -Desert Conserv Prg	386-725	On page 3.14-12, under 3.14.4.5, the BCCE should also be included in this section.	A reference to the BCCE was incorporated into subsection 3.14.4.5.
Clark County Nevada -Desert Conserv Prg	386-726	On page 3.14-22, under Southern Terminal, the third paragraph is confusing. Please expand on recreation, covered species, sensitive species, impacts, and mitigation topics.	The analysis for Southern Terminal was expanded to provide additional information about impacts to the BCCE and mitigation proposed to reduce those impacts.
Clark County Nevada -Desert Conserv Prg	386-728	DCP would like to have the BCCE boundary placed on all maps where applicable especially in the Region 4 sections.	The requested change has been made on all applicable maps in Region IV.
Clark County Nevada -Desert Conserv Prg	386-729	Please note that Alternative IV-C would go through the northeastern portion of the BCCE, TransWest will have to coordinate with BLM, DCP, and Boulder City if this alternative becomes the preferred alternative.	Section 3.14, Land Use, was updated to identify impacts to the BCC under Alternative IV-C and the need for coordination with both DCP and Boulder City in addition to the BLM.
Clark County Nevada -Desert Conserv Prg	386-730	Throughout the Draft EIS chapters the reported size of the Southern Terminal facilities varies from 140 to 205 acres. The Southern Terminal area reported size also varies from 415, 555, and 750 acres.	All acreages for the Southern Terminal facilities have been checked and verified for accuracy and consistency in the FEIS.
Clark County Nevada -Desert Conserv Prg	386-731	Throughout this Draft EIS, the vegetation analysis is incorrect or inconsistency in Clark County, especially around Boulder City (see Figure 3.5-4 Region IV Vegetative Communities). Table 3.5-10 states that the Southern Terminal will impact the Developed/Disturbed vegetation type. The majority of this vegetation type in that area is Mojave Desert Shrub with very little of the Developed/Disturbed vegetation type. Please correct and update analysis, maps, tables, and impacts for all chapters.	The vegetation description for Clark County is based on the Southwest ReGAP vegetation communities. In addition, the land use/vegetation at the Southern Terminal has been verified through aerial imagery and accounts supplied by the applicant.

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Commenter Name	Comment ID	Extracted Comment	Response
Clark County Nevada -Desert Conserv Prg	386-732	On page 2-19, under 2.4.3.1 Northern and Southern Terminals, it states the Southern Terminal would be located at the Marketplace Hub. Since the Marketplace Hub is located within the BCCE, please clarify that the Southern Terminal would be located north of the Marketplace Hub and off the BCCE.	The clarification of the location was made to Section 2.4.3.1 of the Final EIS as suggested; the BCCE is discussed in Section 3.14.6.1 of the Final EIS.
Clark County Nevada -Desert Conserv Prg	386-733	On page 2-28, it states that the Southern Terminal would be constructed in Nevada under phase two (Figure 2-3 and Figure 2-19). Check Figures 2-19 and 2-18, they appear to be the same, Figure 2-19 doesn't appear to be within Nevada.	Clarification was added to Section 2.4.3.1 of the Final EIS to indicate that Figure 2-19 is the substation constructed near IPP in Utah and Figure 2-17 is the southern terminal constructed in the Eldorado Valley of Nevada.
Coalition of Local Government	594-1889	Agriculture and ranching are predominant land uses in the affected counties, and further define the lifestyle and culture of the area. See Carbon County Comprehensive Land Use Plan at 1, 39, 50-51, 85, 92-93 (Nov. 9, 2010); Little Snake River Conservation District Land, Water & Natural Resource Management Plan at 20 (Dec. 2010); Sweetwater County Comprehensive Plan at 2.5 - 2.6, 2.10 (2002); Sweetwater County Conservation District Land & Resource Use Plan & Policy at 13-14, 29, 46, 58-64 (Feb. 3, 2011). Therefore, any impact to livestock grazing and agriculture could significantly impact the custom, culture and economy of the Wyoming Counties over the long term. This alternative will result in the taking of private lands, sterilization of agricultural land uses, and disruption of these uses during construction.	TransWest has indicated its intent to secure necessary short and long-term easements through negotiations with private landowners (see Appendix D and Section 3.5.1.2). Negotiated settlements, based on independent appraisals, seek to compensate landowners for disruption and changes in production. With respect to the effects of reductions in grazing, potential economic effects on permittees with grazing privileges on public lands are acknowledged on pg. 3.17-30 and the magnitude of AUMs affected in Region I is described in Table 3.14-8; approximately 100 AUMs during construction and 26 or fewer AUMs per year long-term will be affected. The magnitude of the estimated changes in grazing and the associated economic effects would not be significant.
Coalition of Local Government	594-1890	Agency Preferred Alternative I-D and Alternative I-C also affect about 3,131 acres and 2,023 acres respectively of the Muddy Creek Wetlands. DEIS at 2-60, 3.7-26, 3.7-54. Executive Order 11990, 42 Fed. Reg. 26961, prohibits construction in wetlands unless there is no practicable alternative and the proposed action includes all practicable measures to minimize harm to wetlands. Rawlins Resource Management Plan (RMP) and Final Environmental Impact Statement (FEIS) 2-107, 4-227. The DEIS fails to meet the above criteria. There are practical alternatives and the preferred alternative does not take all practicable measures to minimize harm.	The applicant committed measures (TWE-20), land management agency land use plans requirements, and mitigation measures WET-1 to WET-4 will be implemented to avoid surface disturbance in wetlands to the extent practical, and to minimize impacts to wetlands and riparian areas where avoidance isn't feasible.
Coalition of Local Government	594-1891	Applicant's Proposed Alternative I-A would avoid the Muddy Creek Wetlands and is therefore a more reasonable preferred alternative. The Coalition would have more support for Alternative I-D if the route were moved farther west to avoid the Muddy Creek Wetlands.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Coalition of Local Government	594-1893	Alternative I-C affects about 1,015 acres of the Upper Muddy Creek Watershed/Grizzly Wildlife Habitat Management Area (WHMA). DEIS at 3.13-10, 3.13-36, 3.13-43. The Rawlins RMP closed this area of the Muddy Creek to energy development and designated the area as a utility right-of-way avoidance area. Rawlins RMP at 2-41 - 2-42, 2-60, Map 2-33b; see DEIS at 3.13-43. This alternative does not comply with the management objectives of the Rawlins RMP. BLM should amend that portion of the route not in compliance to avoid the WHMA or amend the RMP after documenting impacts to the watershed, wildlife habitat, and vegetation.	Impacts are documented in the Recreation, Water, Wildlife, and Vegetation sections. Plan amendments for right-of-way avoidance areas are not required and made at the discretion of the local field office based on resources present per BLM policy. Regardless, the Rawlins Field Office has chosen to amend their RMP to establish a new utility corridor for this Project as well as other future projects to encourage colocation to the extent practical.
Coalition of Local Government	594-1894	The Coalition appreciates the changes BLM made to the DEIS regarding the Coalition's previous comments on healthy rangeland standards, impacts to livestock grazing, and mitigation measures to reduce impacts on grazing. The Coalition identifies below its remaining concerns with the DEIS.	Thank you for your comment. The remaining concerns are addressed separately.
Coalition of Local Government	594-1895	The DEIS has acknowledged the air quality impacts from NO and SO in the project area, but still incorrectly assumes that the net impact of the project would be to improve the atmospheric conditions. DEIS at 3.1-20. The renewable sources of power that would generate electricity in the southwest region of the project area may benefit the atmospheric conditions in Arizona, California, and Nevada by replacing coal-fired power with wind power. However, any benefit will occur thousands of miles away from the construction and operations of the transmission line that will adversely impact the airshed in the northern region, such as in Wyoming. The net impact of the project on the airshed in the north would not be an improvement, but would rather have negative impacts, due to the increased particulates from construction and operation of the wind farms. Renewable sources of power, such as wind energy, will generate particulates in Wyoming and negatively impact the air quality. The DEIS fails to analyze the quantity of such particulates especially when considered cumulatively with other wind farm projects.	The section is focused on the impacts to acid deposition and the comment about potential positive impacts in this section is limited to that context. The text in Section 3.1.6 "Impacts at Class I and II Areas - Acid Deposition" was revised to clarify the regional scale of the statement. Impacts from future wind farm construction and operation in Wyoming are not a connected action and as such are out of the scope of this EIS. Any future federal actions would require appropriate subsequent NEPA analyses.
Coalition of Local Government	594-1896	Sweetwater and Carbon Counties encourage and support environmentally responsible natural resource exploration and development. See Carbon County Comprehensive Land Use Plan at 39, 53 (Nov. 9, 2010); Little Snake River Conservation District Land, Water & Natural Resource Management Plan at 20 (Dec. 2010); Sweetwater County Comprehensive Plan at 2.9 - 2.10, 7.1 (2002); Sweetwater County Conservation District Land & Resource Use Plan & Policy at 9, 12-13, 32-34 (Feb. 3, 2011). Natural resource exploration and development is a primary land use in the Counties and supports the local economy of these rural areas. It also significantly contributes to the State revenues.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Coalition of Local Government	594-1897	The DEIS should discuss the oil and gas resources and mining claims separately in this section because each type of mineral resource may be impacted differently by the proposed project. It should also identify where producing and non-producing oil and gas leases and mining claims are located, and the impacts associated to each type of lease and claim. Table 3.2-3 and Figure 3.2-5 identify the oil and gas fields, coal fields, coal regions, and mining claims. DEIS at 3.2-15 - 3.2-16. However, it fails to identify the location of any specific oil and gas leases or wellheads in the project area. These should be included in the map of the mineral resources and also described within the impacts section as the proposed alternative routes may impact specific leases and wells in addition to the oil and gas fields identified. See DEIS at 3.2-15, 3.2-40 - 3.2-43.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Due to the thousands of miles of alternatives, it is not feasible to analyze all of the claims and leases for validity or potential commerciality, or mitigate for all possible situations that may arise with regard to resource conflicts. It is also not possible for the BLM to dictate the terms and conditions in agreements between the applicant and mineral owners or lessees. The BLM will issue a ROW grant that is consistent with applicable regulations but recognizes that the applicant must acquire all access permissions in mixed ownership situations and it is expected that mineral rights conflicts would be resolved prior to construction. The proposed transmission line, when constructed, will occupy a 250-foot wide ROW. The 250-foot wide ROW should facilitate resolution of many perceived conflicts. The terms and conditions of the ROW grant, as specified in 43 CFR Subpart 2801, includes "the right [of the BLM] to require common use of the right-of-way, and the right to authorize use of the right-of-way for compatible uses (including the subsurface and air space)." The BLM recognizes that subsurface activities (in this case, mineral extraction) may not in all cases be compatible with the intended ROW use but as stated above, potential conflicts must be resolved prior to construction. It also should be noted that although many unpatented mining claims have dubious validity, it is the responsibility of the ROW grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners.
Coalition of Local Government	594-1898	Under impacts, the DEIS has stated that construction activities may prevent access to mineral resources, cause land use conflicts, or set back limitations might occur in densely spaced oil and gas field developments. DEIS at 3.2-40. The DEIS should identify the set back limitations, such as those standards created by the Federal Energy Resource Committee (FERC). The DEIS must disclose how nearby mineral resource development can occur. A well pad could not be located underneath a transmission line or within the right-of-way but could be located outside of the right-of-way. Thus, the location of the wellheads compared to the proposed location of the transmission line is very important.	See response to Comment ID 594-1898. Section 3.2.6 describes that the analysis assumes mineral entry can take precedence over other land uses, including a utility ROW. Section 3.2.6.2 describes the applicant's commitment to avoid wellheads and associated facilities by recognizing a 250-foot avoidance buffer around existing wellheads.
Coalition of Local Government	594-1899	The DEIS states that it is possible that mineral resources would be found underneath the right-of-way and would not be accessible for the life of the project. See DEIS at 3.2-60. There is more than a possibility that this will happen, it is almost guaranteed considering the number of oil and gas fields in the project area. This statement also contradicts the assumption in the DEIS that "mineral entry can take precedence over other land uses and that granting a utility ROW does not overrule mineral owners' rights to develop and extract minerals." DEIS at 3.2-36. The DEIS does state that oil and gas resources will be less affected because of the minimum stand-off of 250 feet and the ability to use directional drilling. However, it omits discussion on who really has priority in the proposed right-of-way. Does the transmission line have to be relocated, does the lessee lose some portion of its lease that is bisected by the line, or does the power company compensate the lessee for having to do more expensive directional drilling to avoid conflicts? The impact of the inability to access a mineral resource effects a taking of the rights of the lessee because he purchases a lease with the expectation of developing it in a time-frame that would bring a return on his investment. Waiting until the end of life of the transmission line to access areas under a lease could lead to the lessee losing the lease or being unable to relocate a wellhead once pressure has dropped below recovery rates. Therefore, the short term effects may impact the long-term productivity of the mineral resources for a lessee. See DEIS at 3.2-61.	Section 3.2.6 states that it is assumed the mineral entry can take precedence over other land uses. See response to Comment ID 594-1898.
Coalition of Local Government	594-1900	The DEIS does not adequately address the impacts on valid existing rights and instead appears to assume that the transmission line right-of-way supersedes these rights. The opposite is true, any right-of-way is subject to other valid rights. 43 C.F.R. §2805.14. Current mineral leases and valid mining claims are valid existing rights and the transmission line cannot lawfully interfere with the exercise of these rights. Thus, the transmission line may need to change the route to accommodate development and the DEIS needs to address this fact.	See response to Comment ID 594-1898.
Coalition of Local Government	594-1901	The DEIS appears to exclude the riparian and wetland areas along the Muddy Creek from its discussion in Chapter 3.5. See DEIS at 3.5-12, 3.5-14. The description of Region I does not include any detail about the Muddy Creek Wetlands and Figure 3.5-1 does not appear to identify the wetlands on the map. The DEIS includes the Muddy Creek Wetlands in its discussion of impacts to wildlife in Chapter 3.7, so it must also identify it in the section on vegetation. See DEIS at 3.7-12, 3.7-22, 3.7-26, 3.7-54, 3.7-62. Alternatives I-C and I-D both pass through the Muddy Creek Wetlands and would have an adverse impact to the vegetation and wildlife within this area. See DEIS at 2-60, 3.7-12, 3.7-54.	The wetlands affected environment and impact discussion focuses on wetlands and riparian areas identified across the entire route. The wetlands in the Muddy Creek Area are shown in Figure 3.5-1. Wetlands and riparian areas are not discussed individually in the wetland and riparian section, however impacts to these wetlands are disclosed as part of the impacts to Alternatives I-C and I-D in Section 3.5.6.3.

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Commenter Name	Comment ID	Extracted Comment	Response
Coalition of Local Government	594-1902	Tens of thousands of migrating water fowl, shorebirds, and numerous other avian species use the Muddy Creek Wetlands. The Wyoming Audubon lists this area as an Important Bird Area (IBA) and over 120 species of birds have been identified as utilizing the wetlands and the associated migration corridor. Several of these species are species of concern, including several with NSS1 status and on BLM's 6480 list. The proximity of any transmission line to the wetlands significantly increases the potential for collision and death of migrating birds. The DEIS does not disclose nor discuss the impact or expected loss of avian wildlife due to collision with transmission lines in this area. BLM must provide in the Vegetation Section discussion on the Muddy Creek Wetlands and address the potential impacts from the proposed transmission line.	Comment noted. The Muddy Creek Wetlands IBA is discussed in Section 3.7.5.3 Non-Game Species (DEIS page 3.7-26), and Section 3.7.6.3 Region 1 (DEIS page 3.7-51), and potential impact acreages are provided in Table 3.7-23 (DEIS page 3.7-54). No change to text. The wetland complex is also visible on the wetland and riparian figures, and the acres included in the acres of wetlands and riparian areas discussed in the wetland and riparian text in Section 3.5. Current literature does not support a specific methodology for quantitative analysis of avian collisions with transmission lines, therefore the DEIS does not attempt to provide quantification of potential collision. The DEIS does discuss avian collision qualitatively in Section 3.7.8.
Coalition of Local Government	594-1903	The Wildlife Section does identify the Muddy Creek Wetlands IBA and addresses the impacts on migratory birds, including waterfowl, and the potential of mortality due to collision and electrocution. DEIS at 3.7-12, 3.7-49 - 3.7-50, 3.7-54. Why then is BLM proposing a preferred alternative that will increase the potential collisions for sensitive avian species? Unless BLM plans to conduct an extensive analysis of the impacts to avian collision in this highly sensitive area, Alternative I-A should be selected because it avoids the wetlands, is consistent with the Rawlins RMP, and negates the need for additional analysis. Alternatively, the DEIS needs to document that there is no other practicable alternative and that all possible mitigation measure will be required to protect wetlands.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on multiple resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Coalition of Local Government	594-1904	The DEIS also states that following completion of construction, the disturbed areas would be immediately reclaimed. DEIS at 3.5-27, 3.5-38, 3.14-19, 3.14-31. This language should also be incorporated into the design feature TWE-26 and mitigation measure VG-3 regarding vegetation management and noxious weeds. See DEIS at App. C-17, App. C-123. The reclamation plan should also consider the use of a mix of native and sterile nonnative plant seed for site stabilization in the first step of reclamation of disturbed areas. See DEIS at 3.5-28, App. C-5 (VEG-1), App. C-122 (S-13), App. C-123 (VG-1). Sterile nonnative plant seeds have been successfully used in the project area to restore vegetation cover and hold the soil until native plant species reestablish themselves. The combination of drought, alkaline soils, and slow germination of native seeds make successful reclamation very difficult. Monitoring of reclamation success should be done for five years to ensure re-establishment of native species.	Reclamation will occur after construction. The word 'immediately' has been deleted from the text to be consistent with the reclamation timeline outlined in the PDTR. Seed mix requirements will be determined by the appropriate land management agency. BLM requirements for seed mixes vary between offices and states depending on the individual needs of the various vegetation communities crossed by the proposed project.
Coalition of Local Government	594-1905	The Applicant Proposed Alternative I-A will have less impact on Mule Deer winter range in the Baggs area and decrease the impacts to the east to west migration corridor for the Baggs Mule Deer herd. See DEIS at 3.7-16, 3.7-52. Alternative I-A moves the transmission line farther west where the migration corridor is much broader and significantly less impacted by other uses, such as oil and gas development. BLM Preferred Alternative I-D and Alternative I-C will further constrain and negatively impact the Baggs Mule Deer migration corridor at its most constricted point near the five mile point where only two tunnels under the highway (1.5 miles apart) provide for migration. These alternatives should conduct a cumulative impact analysis with existing oil and gas activity to show the impact on the Mule Deer migration corridor. Additional infrastructure and human activity associated with transmission lines in this area may negate or severely impede the use of this narrow corridor for Mule Deer migration. The DEIS needs to analyze these impacts in greater detail and propose mitigation.	Section 5.3.7.2 of the Draft EIS discloses cumulative impacts to Mule Deer Winter Range, including impacts from oil and gas projects. This analysis was revised to include an analysis of the cumulative impacts on the Baggs mule deer corridor.
Coalition of Local Government	594-1906	The DEIS continues to omit the brood-rearing and winter habitat areas in Wyoming under its analysis of sage-grouse habitat. See DEIS at 3.8-26 (Fig. 3.8-1). BLM has stated that the wintering habitat populations are currently being defined in Wyoming (DEIS at 3.8-14), but fails to recognize that both the Rawlins and Rock Springs Field Offices have commissioned studies of sage grouse in Wyoming and have mapped out these areas for projects involving lease parcel sales. Both Field Offices have also done the same for the brood-rearing habitat areas. These studies, called Energy by Design, were conducted by The Nature Conservancy through the use of satellite mapping to identify suitable replacement habitat for sage grouse. The DEIS must incorporate these studies as new information and include mapping of these two types of habitats within Wyoming. Even if these designations are not final the information should be included in the DEIS. It is both relevant and potentially significant.	The BLM Wyoming State Wildlife lead for the TWE project recently confirmed that the requested information is currently unavailable for project inclusion. No change to FEIS text.

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Commenter Name	Comment ID	Extracted Comment	Response
Coalition of Local Government	594-1907	The DEIS states that the project construction activities located within 0.5 mile of high or moderate sensitivity viewsheds would not comply with visual resource management (VRM) Class III objectives. DEIS at 3.12-22. During operation, indirect impacts in the immediate foreground 0.5 mile from sensitive viewers may not comply with VRM Class II objectives. DEIS at 3.12-27. The transmission line right-of-way must be modified to conform to the objectives. The DEIS only states that mitigation "typically would reduce visual contrasts to moderate" and result in compliance with VRM Class III, or that within VRM Class II the impacts would be mitigated on a "case-by-case basis." DEIS at 3.12-22, 3.12-27. For Region I, all of the alternatives would still leave a range of one to eight percent of the project area not in compliance with VRM Class III objectives after mitigation occurs. See DEIS at 3.11-23, 3.11-25 - 3.11-26, 3.12-37 - 3.12-39, App. I-451, I-592, I-627, I-636. This is inconsistent with BLM rules that require projects to be consistent with the RMP. 43 C.F.R. §§1601.0-5(b), ©; 1610.5-3. The proper mitigation must occur so that the transmission line right-of-way complies with VRM objectives throughout the project area. It is unlikely that a transmission line will meet VRM Class II. It is permanent construction that changes the viewshed with its vertical structures. Alternatively, the Rawlins RMP must be revised to change the VRM to Class IV. Other projects involving oil and gas operations and ranching have had to incur significant costs to ensure compliance with the objectives, so this project should not be treated any differently.	Due to the linear nature of this project, the BLM has determined to include a plan amendment to establish a new utility corridor to accommodate this project with sufficient room to accommodate other possible future projects. The new utility corridor will allow the BLM to provide case-by-case exceptions to other resource conflicts, such as visual resources, at the discretion of the authorizing officer. However, the possibility of the exception does not provide for an applicant to ignore BLM resource management prescriptions in the area, as exceptions would only be granted after developers have made a reasonable effort to incorporate area prescriptions to the extent practical and feasible.
Coalition of Local Government	594-1908	The Coalition appreciates the inclusion of the Little Snake River Conservation District Land, Water, and Natural Resource Management Plan in the table of county plans. See DEIS 3.14-2. This plan should also be included in Table 3.14-10 of the DEIS in the list of plans for Carbon County, Wyoming, because it addresses natural resource management on all lands within its local jurisdiction. See DEIS at 3.14-33.	Reference to the Little Snake River Conservation District Land, Water, and Natural Resource Management Plan was added to Table 3.14-10, consistent with Table 3.14-2.
Coalition of Local Government	594-1909	The DEIS does discuss local roads and possible congestion issues, but it fails to address how the project will impact the local roads within each specific Region of the project area. See e.g. DEIS at 3.16-20, 3.16-22, 3.16-24 - 3.16-29. The DEIS cannot assume that each State's local transportation system will be similarly affected by the construction and operation of the proposed transmission line. The DEIS must provide a more complete discussion on the transportation impacts for each Region in the project area.	Without the availability of details from the pending Road Analysis Plans, regional specifics regarding possible congestion issues on local roads are unknown at this time. The anticipated effects are defined adequately along with the process that will be implemented to resolve congestion issues roadway by roadway. Section 3.16 was modified to further clarify this pending process.
Coalition of Local Government	594-1910	The effect on traffic congestion and access issues varies depending on the Region of the project area that is being analyzed. In some areas, such as in Wyoming, local roads are more prevalent than highways and interstates, and carry most of the local traffic. These local roads are commonly narrower and may be unpaved, and are therefore more susceptible to adverse impacts from increased construction and operational traffic in the project area. When energy development traffic is the highest, seasonal traffic on the roads exceeds the level of service. Many livestock operations trail their livestock, adding to the congestion. It does not appear that the DEIS adjusted for seasonal traffic congestion. Access issues are also more likely to occur when other projects are constructed in the area. See DEIS at 3.16-14 - 3.16-15, 3.16-20. In Wyoming, oil and gas fields are located throughout a large portion of the project area and already cause congestion on the local roads. See DEIS at App. I-575. Oil and gas projects' traffic plus construction traffic related to the transmission lines (TransWest Express, Gateway South, and Gateway West) will lead to a number of traffic issues on the local roads in Wyoming. The Coalition does not agree with the DEIS conclusion that congestion would be rare or minor, or that the cumulative impact would be low. See DEIS at 3.16-20, 3.16-22, 3.16-25 - 3.16-31, 5-50- 5-51.	Section 3.16 describes the potential for project related traffic to add to existing traffic from various sources, including energy development. Section 3.16 states that substantial congestion from project-related sources would be limited in duration in particular locations and intensity over 24 hours. Section 3.16 states that project-related traffic plus additional traffic from various kinds of development, including but not limited to energy extraction, could lead to congestion, safety issues and increased maintenance issues. Section 3.16 was modified to further clarify the requirements and processing necessary for TransWest to obtain approval of their pending Road Analysis Plans. The finding that congestion would be rare and minor reflects an overall assessment and the idea that cumulative effects from existing, Project-related and other traffic would be addressed adequately before TransWest's Road Analysis Plans are approved.
Coalition of Local Government	594-1911	The DEIS states that route-specific road access plans would be developed for the Agency Preferred Alternative once it is determined. DEIS at 3.16-17, 3.16-21, 3.16-23 - 3.16-24. It also calls for the a transportation plan for the transport of transmission tower or pipeline components, assembly cranes, and other large equipment. DEIS at 3.16-17. Construction and maintenance of the project will require the construction of new roads for access or upgrading and/or maintenance of existing roads. Therefore, the transmission line project must include a Transportation Plan that identifies specific roads that will be constructed and/or maintained, the standards it will follow, maintenance requirements, and what happens with the road at the end of the project.	The comment acknowledges that Section 3.16 covers key elements of the Road Access Plan development and approval process and defines requirements for the pending reviews. Section 3.16 was modified to further clarify the Road Access Plan process as it relates to local, state and federal requirements. The discussion also refers to an appendix that provides additional detail about the U.S. Forest Service Travel Management Plan review process.
Colorado Parks and Wildlife	685-1299	Subsequent to the submittal of the scoping comments, CPW has identified issues with an important conservation easement and potential wildlife impacts on the south side of Highway 40 and has forwarded these concerns on to the Bureau of Land Management (BLM), the National Park Service (NPS), and the US Fish and Wildlife Service (USFWS) as indicated in the attachments, dated April 26, 2013.	The conservation easement discussion in Section 3.14 was augmented as needed to include conservation easements overlapping proposed routes, including the easement currently being pursued by NRCS and the Colorado Cattlemen's Association.

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Colorado Parks and Wildlife	685-1303	The BLM-managed Cross Mountain Wilderness Study Area provides additional habitat protection in the landscape surrounding the Tuttle Easement. In support of CPW's efforts to create landscape scale habitat protections, CPW requests that north-south routing of the transmission corridor occur to the west and north of the Tuttle easement.	An additional micro-siting alternative in the area of the Tuttle Ranch Easement and the NPS Deerlodge Road is being considered in the Final EIS. It was developed with input from the NPS and other cooperating agencies. Section 2.5.1.1 of the Final EIS contains a description of this additional micro-siting option.
Colorado Parks and Wildlife	685-1305	CPW expects that this EIS will incorporate sufficient protective measures for greater sage-grouse and will be consistent with the Programmatic Greater Sage-Grouse EIS.	Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal- and state-required avoidance and protection measures relevant to the greater sage-grouse. The NW Colorado DEIS is currently under review. Depending upon the timing of the completion of both NEPA processes, TWE intends to comply with all applicable conservation measures resulting from the NW Colorado EIS process.
Colorado Parks and Wildlife	685-1306	Other species of concern that could be impacted by one or more route segments include, but are not limited to, great blue herons, greater sandhill cranes, burrowing owl. And a variety of additional aquatic species.	Thank you for your comment. Great blue herons and sandhill cranes are not considered special status species and, as such, are addressed in Section 3.7 of the EIS. The burrowing owl is a BLM-designated sensitive species and is addressed in Section 3.8 of the EIS. Potential effects to aquatic species are discussed in Section 3.9.4.
Conservation Colorado	171-463	We respectfully request a 60-day extension to the comment period for the TransWest Express Transmission Project Draft Environmental Impact Statement (TWE DEIS). The primary reason for our request is that the Northwest Colorado Greater Sage-Grouse Draft Land Use Plan and Environmental Impact Statement is currently out for public review and similar plans are slated to be released in September for Utah and Wyoming.	The BLM determined that a 90-day comment period was sufficient for comment on the Draft EIS and declined to extend the comment period further. Please note that a 90-day comment period is double the required comment period required for EISs for site-specific projects and meets the requirements for comment periods for EISs analyzing land use plan amendments. These requirements are detailed in the Council of Environmental Quality Regulations for the Implementation of the National Environmental Policy Act (CEQ regulations), the BLM NEPA Handbook (H-1790-1), and the BLM Land Use Planning Handbook (H-1601-1). Information regarding the concurrent planning processes is provided in Appendix G of the FEIS. The lead agencies' have been coordinating with their counterparts on the on-going sage grouse planning efforts. The Final EIS analyzes a full range of alternatives to ensure the lead agencies' are able to make a decision that is consistent with potential sage grouse planning decisions.
Cooper, Anita	232-253	There is truly no need to go along the Highway 13 Corridor when the BLM has a multi-use designation on the proposed route by TWE. In my opinion the Highway 13 alternative should be removed from any further consideration and construction should begin as soon as possible putting in a transmission line on the proposed route (Alternative I-A).	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Alternative I-C has been retained for further analyses and consideration as it provides an alternative to address resource concerns associated with other routes being considered, particularly impacts to Forest Service inventoried roadless areas. For details on the relative impacts of the alternatives see Chapter 3 of the Final EIS.
Corporation of the Presiding Bishop-LDS	614-793	Camp Timberlane is good example (see Maps 1 and 2). This is an existing camp that offers improvements and facilities for large groups of people. The current line alignments in the II-E and II-F corridors each bisect Camp Timberlane. The fact that the line may be located within the camp or very near to it is very concerning. A high voltage transmission line is starkly inconsistent with the purpose of a large camping complex frequented by large youth groups and families. Given the setting, the visual impact of the line would be jarring and would significantly degrade the value and purpose of the camp.	The text in Section 3.13.6.10 on DEIS page 3.13-78 regarding impacts to Camp Timberlane for Alternative II-E describes the construction impacts of the transmission line, as well as the operational effects the transmission line would have on the visual setting of the camp area and the potential disruption to camp visitors from maintenance operations. However, the presence of the transmission line would not itself prevent use of the campground. The visual impact summaries in Section 3.12.6.5 and Table 3.12-14 disclose the visual impacts for Camp Timberlane.
Corporation of the Presiding Bishop-LDS	614-794	Another good example is the Crescent Regional Recreation Camp (see Maps 1 and 2). Like Camp Timberlane, this camp is improved with camping and recreational facilities (including a reservoir) for large youth and family groups. The current line alignment in the II-F corridor runs across the northern boundary of this camp at a higher elevation overlooking the camp. Presumably the line will be highly visible from nearly anywhere in camp and very accessible to camp patrons. We understand another potential alignment would cross near the southern boundary of the Crescent Regional Recreation Camp, which presents the same concerns and is likewise unacceptable.	Crescent Regional Recreation Camp has been added to the Figure and Tables in Section 3.13.5.2 and Tables and Alternative II-F text in Section 3.13.6.10. The text in Section 3.13.6.10 describes the impacts to recreation at the camp, including impact to the recreation setting and recreation use at the camp from both Alternative II-F and the Emma Park Alternative Variation. The visual impact summaries for Alternative II-F and Emma Park Alternative Variation in Section 3.12.6.5 disclose the visual impacts to the Crescent Regional Recreation Camp.
Corporation of the Presiding Bishop-LDS	614-795	Further, it is CPB's experience that when a new road is built even on private land, the public takes this as an invitation to use the private road to access nearby public and private lands. The road system that will accompany the new transmission line will inevitably lead to greater trespassing on CPB camping properties in the area. This will further degrade the quality and safety of CPB properties. It also raises significant safety concerns as these camps are often utilized as "Girl's Camps" where groups of young women between the ages of 12 and 18 come from local congregations to utilize the camps. Because the properties are remote, it will be difficult to police trespassers. Finally, trespassing by hunters that will be facilitated by the required roads presents real safety concerns for the camp patrons.	These are understandable concerns regarding unauthorized use of project roads. As such, the text in Section 3.13.6.10 on DEIS page 3.13-78 regarding impacts to Camp Timberlane includes use of Mitigation Measure REC-2 to address impacts from project roads. Mitigation Measure REC-2 (DEIS page 3.13-38) states that within designated recreation management areas, access shall be limited to existing roads whenever practicable. If new and improved access cannot be avoided within these areas, access roads shall be closed or rehabilitated through methods and monitoring developed through consultation with the landowner or land management agency. Methods for closure could include gates, obstructions such as berms or boulders, or partial or full restoration to natural contour or vegetation.

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Commenter Name	Comment ID	Extracted Comment	Response
Corporation of the Presiding Bishop-LDS	614-797	The Applicant Proposed II-A and Agency Preferred Alternative II-F corridors are the same in Sanpete County, where CPB owns and operates the Jordan Oaks Recreational Camp (see Maps 1 and 3). This camp is very similar to Camp Timberlane and the Crescent Regional Recreation Camp, and lies partially within the proposed corridor. CPB has the same concerns here as the other camps. However, if and only if the line is sited on the western edge of the corridor next to the existing transmission line, on the other side of the ridge from the Jordan Oaks Recreational Camp, where it would be far from and not visible from the camp, then these concerns could be somewhat mitigated. CPB requests that the line be sited on the western edge of the corridor where it is not visible from the Jordan Oaks Recreational Camp.	Thank you for your comment. The Final EIS preliminary engineered alignment for the area you refer to has been sited as close as possible to the existing transmission infrastructure to minimize visual impacts.
Corporation of the Presiding Bishop-LDS	614-801	CPB appreciates your hard work and efforts to prepare the Draft EIS and looks forward to a final decision on the routing of the line	Thank you for your comment.
Cross Mountain Ranch	589-845	Cross Mountain Ranch is in the process of a major conservation easement initiative that would protect important wildlife habitat in Moffatt County. It is the largest initiative currently pending in the state of Colorado to protect sage-grouse habitat. In addition to the priority sage-grouse habitat, the property includes the following: black-footed ferret reintroduction site; severe winter range and winter concentration area for elk, pronghorn and mule deer; nesting sites for bald eagles; extensive riparian corridors along the Yampa and Little Snake rivers; habitat for native fish species of state and national significance, including the Colorado River Cutthroat trout; and 96% of the ranch is considered "Type A Habitat" for avian conservation (as determined by the Intermountain Joint Venture). The forthcoming environmental study, being prepared at the behest of the conservation easement funders, the United States Department of Agriculture's Natural Resources Conservation Service (NRCS) and the Colorado Division of Parks and Wildlife (CPW), will provide information necessary to support micro-siting options for Cross Mountain Ranch.	Comment noted. TWE project micro-sitting in the Cross Mountain Ranch/Tuttle Easement area continues to develop. Existing information regarding sensitive habitats has been included in sitting decisions and associated analysis disclosed in the Final EIS.
Cross Mountain Ranch	589-846	Because funding for the conservation easement came together only recently, the environmental study associated with the project was commenced recently, as part of due diligence to secure final approval for the funding. This due diligence, including the wildlife habitat study, will be completed before December 31, 2013. Funding has been committed but is not yet secured for the conservation easement, and is dependent on the outcome of the due diligence process. While the study is being prepared, the project is in a critical phase; a decision to locate the transmission line inappropriately could jeopardize wildlife habitat, the federal and state funding necessary to protect the habitat, and the conservation easement itself. This reflects significant information and impacts that are not included in the DEIS.	The conservation easement analysis in Section 3.14 of the Final EIS has been augmented as needed include additional conservation easements overlapping proposed routes, including the proposed Cross Mountain Ranch easement.
Cross Mountain Ranch	589-847	Cross Mountain Ranch is located in Region 1 of the TWE project. In the Draft EIS, BLM identifies the "Tuttle Conservation Easement" as the only conservation easement in Region 1 of the project. Pending closure on the Cross Mountain Ranch conservation easement, there will be two conservation easements, adjacent to one another, in Region 1. BLM's discussion of Alternative 1-D includes three "micro-siting" options designed specifically with the Tuttle easement in mind. (DEIS at 2-40 and 3.14-38.) ¹ BLM has also expressed concern in conferences with Cross Mountain's counsel for minimizing impacts to the Cross Mountain Ranch conservation easement as well, even though the easement has not yet been fully completed.	The conservation easement analysis in Section 3.14 of the Final EIS was revised to include additional conservation easements overlapping proposed routes, including the proposed Cross Mountain Ranch easement.
Cross Mountain Ranch	589-848	There is broad scientific consensus that sage-grouse are extremely sensitive to transmission lines. Accordingly, the Sage Grouse National Technical Team (NTT) has identified conservation measures for priority habitat areas, one of which designates priority habitat areas as exclusion areas for new ROW permits. (DEIS at 3.8-14.) We expect that the information being prepared for NRCS and CPW in conjunction with the Cross Mountain Ranch conservation easement will provide pertinent information for routing decisions in the area around Cross Mountain Ranch, the Tuttle Easement, and Dinosaur National Monument, and will facilitate BLM's compliance with its guidelines and priorities concerning wildlife habitat, and in particular, sage-grouse habitat.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Defenders of Wildlife	559-1607	Defenders supports many of the comments, concerns and recommendations made in the comment letter, TransWest Express DEIS Comments (TWS, Audubon Rockies and partners – 9-30-13), specifically recommendations related to avoidance, minimization and mitigation for resource impacts.	Defenders support for comments made by Audubon Rockies and partners is noted.

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Commenter Name	Comment ID	Extracted Comment	Response
Defenders of Wildlife	559-1609	Developing and implementing conservation strategies at regional or landscape scales will have the greatest benefit for sage-grouse and their habitat (see Doherty et al. 2011). Protecting large expanses of sagebrush steppe and current populations of greater sage-grouse are the highest priority (Connelly et al. 2011a; Wisdom et al. 2005b). Given the importance of public lands to sage-grouse conservation; the sensitivity of these lands to disturbance, their longer recovery periods and variable response to restoration; and their susceptibility to invasion by exotic plants (Knick 2011), land uses that negatively affect these lands should be avoided or prohibited in key habitat areas to conserve sage-grouse habitat. Establishing a system of habitat reserves in sagebrush steppe will also help conserve essential habitat and ecological processes important to sage-grouse conservation.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. The applicant has committed to project conformance with all applicable state regulations regarding designated priority and sensitive greater sage grouse habitat. This information is provided in Appendix C (DEIS pages C-1 to C-126).
Defenders of Wildlife	559-1610	To address the conservation challenges, the National Technical Team (NTT), an ad hoc committee of 23 federal and state land managers and sage-grouse experts (including 14 BLM representatives), drafted guidelines for conserving sage-grouse and their habitat. The NTT report is a primary reference for the National Greater Sage-Grouse Planning Strategy. It recommends making priority habitat "exclusion areas" for new ROWs, and general habitat "avoidance areas." Priority habitat is generally defined as "having the highest conservation value to maintaining sustainable Greater Sage-grouse populations" (BLM Memo 2010-071) and should include all active sage-grouse leks, and brood-rearing, transitional and winter habitats. "Priority habitat will be areas of high quality habitat supporting important sage-grouse populations, including those populations that are vulnerable to localized extirpation but necessary to maintain range-wide connectivity and genetic diversity" (BLM Memo 2010-071). Unfortunately, the proposed route for the TWE line overlaps sage-grouse priority habitat and is likely to harm sage-grouse.	Comment noted. The NTT report has been considered and referenced in the FEIS analysis. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and Applicant objectives while balancing federal land managers' multiple use mandate.
Defenders of Wildlife	559-1612	Given the known impacts on sage-grouse from transmission development, the BLM should be cautious of moving forward with development decisions prior to other decision-making affecting conservation of the species. The proposed routes for TWE cross through key sage-grouse habitats, particularly in Moffat County, Colorado, southwestern Wyoming, and Utah's Uintah Basin, areas under review in the National Greater Sage-grouse Planning Strategy, and it is vital that route planning—specifically focused on avoidance—fully and adequately consider impacts on the species.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and TransWest's objectives while balancing federal land managers' multiple use mandate. TransWest has committed to project conformance with all applicable state and federal mandates regarding greater sage grouse habitat that are in place at the time of the TWE ROD. A detailed analysis of Project-related impacts to greater sage-grouse habitat was presented in Section 3.8.6 of the Draft EIS. This analysis has been refined and augmented for the Final EIS along with proposed mitigation measure SSWS-5, designed to avoid or minimize impacts to this species.
Defenders of Wildlife	559-1614	In light of the aforementioned issue, a group of 12 conservation organizations, including Defenders, submitted a formal request on August 27, 2013, for a 60-day extension to the comment period for the TransWest DEIS. The primary reason for our request is that the NW CO Draft GRSG RMP/EIS is currently out for public review and similar plans are slated to be released in September for Utah and Wyoming. One of the most important issues raised by the proposed TWE project is potential impacts to sage-grouse populations and habitat – as referenced above the preferred route in the TWS DEIS directly impacts the planning area currently under review in the NW CO Draft GRSG RMP/EIS – and extending the comment period would have provided the public with an adequate time frame to participate in both planning processes in a substantive manner, and also allow for a more complementary and in-depth analysis of both documents and submission of constructive comments. The BLM denied the extension request.	The BLM determined that a 90-day comment period was sufficient for comment on the Draft EIS. Please note that a 90-day comment period is double the required comment period required for EISs for site-specific projects and meets the requirements for comment periods for EISs analyzing land use plan amendments. These requirements are detailed in the Council of Environmental Quality Regulations for the Implementation of the National Environmental Policy Act (CEQ regulations), the BLM NEPA Handbook (H-1790-1), and the BLM Land Use Planning Handbook (H-1601-1).
Defenders of Wildlife	559-1615	The lack of public information available to reconcile these tandem and potentially conflicting planning processes represents a critical and unacceptable lack of transparency that strongly impairs the public's ability to provide constructive comments on TWE. It is also unclear how BLM can move forward given this planning bottleneck, not just for TWE but for other priority transmission projects such as Gateway South and Zephyr given that key information that is foundational for sage-grouse planning is missing. We recommend that these upcoming plans be used to make a full and meaningful range of alternatives before a decision is made.	Information regarding the concurrent planning processes is provided in Appendix G of the FEIS. The lead agencies' have been coordinating with their counterparts on the on-going sage grouse planning efforts. The Final EIS analyzes a full range of alternatives to ensure the lead agencies' are able to make a decision that is consistent with potential sage grouse planning decisions.
Defenders of Wildlife	559-1616	Recommendation: The tandem processes of sage-grouse and transmission line planning must be made consistent, and details regarding the integration of these efforts must be made fully available for public comment.	Information regarding the concurrent planning processes is provided in Appendix G of the FEIS. The lead agencies' have been coordinating with their counterparts on the on-going sage grouse planning efforts. The Final EIS analyzes a full range of alternatives to ensure the lead agencies' are able to make a decision that is consistent with potential sage grouse planning decisions.
Defenders of Wildlife	559-1619	Although our comments are limited to an analysis of the routes included in the DEIS, there may be alternate routes which do a better job of avoiding impacts to desert tortoise and other protected species, and we encourage the BLM, the Applicant and Western to analyze other routes with desert tortoise impacts in mind.	Because the southern terminal is situated within a concentrated area of desert tortoise habitat, an alternative that completely avoids critical habitat is not feasible. However, in the development of the alternatives, the lead agencies have attempted to maximize the use designated utility corridors. Additionally, Section 3.8 of the Draft EIS contains measures to avoid or minimize the impacts to desert tortoise.

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Commenter Name	Comment ID	Extracted Comment	Response
Defenders of Wildlife	559-1620	Impact on the federally listed species should be offset through mitigation measures including, but not limited to: on-the-ground conservation actions such as land acquisitions, installing protective fencing, retiring grazing allotments, withdrawal of locatable mineral entry, limiting off-highway vehicle access, and implementing restoration projects. With regards to impacts to designated desert tortoise critical habitat, we recommend habitat loss compensation at a 5:1 ratio. Furthermore, we strongly recommend against any new roads in designated desert tortoise critical habitat, but if it absolutely necessary to construct new roads we recommend they be closed to motorized vehicle use by the public and effectively fenced.	Comment noted. The applicant has committed to minimizing the construction of new access roads through micro-siting and the utilization of existing access routes to the extent possible. The applicant anticipates continued coordination with the USFWS on avoidance and minimization of impacts to desert tortoise and its designated Critical Habitat in addition to compliance of construction and operation activities the official species specific terms and conditions developed during the Section 7 consultation process and provided in the USFWS Biological Opinion.
Defenders of Wildlife	559-1621	Golden eagles (GOEA) are protected under two major forms of federal legislation, the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA), and under increasing federal scrutiny with uncertain population levels. Take is likely unavoidable with a transmission project of this magnitude and in this location. Use by GOEA is not surprising as the application area contains native shrubland and grassland communities, as well as natural landscape features, that provide foraging and nesting opportunities sought by this species. In concert with our conservation groups, Defenders recommended that the BLM develop a supplemental GOEA document for public review and comment. That has not yet occurred. Given the continued concern for these important raptors, especially related to mortalities associated with wind development and expanding transmission infrastructure, any development decisions must be consistent with the conservation requirements under BGEPA. In addition, GOEA impacts must be placed within the appropriate regional population context. Areas 10 miles from the application area should be evaluated. Adequate buffers for GOEA should be in place and monitored to evaluate effectiveness. For unavoidable impacts, compensatory mitigation for retrofitting of lethal power poles should be considered. We note that spatial buffers for GOEA nests, as is done for Bald Eagles in most field office planning areas, should be 1.0 miles.	Comment noted. Due to the large diameter and wide spacing of conductors, TWE is expected to create minimal collision and electrocution risk to golden eagles. Consequently, preparation of an eagle conservation plan is not considered warranted at this time. Seasonal and spatial impact avoidance buffers are listed in Section 3.7.4.3 of the Final EIS. Implementation of proposed mitigation measure WLF-2 would avoid impacts to nesting raptors. Implementation of WLF-8 would further minimize collision risk to eagles and other migratory birds.
Defenders of Wildlife	559-1622	Defenders is pleased to see the Department of the Interior and the BLM recognize the need for a more transparent and systematic approach to mitigation, based on sound science, that addresses clear conservation priorities. We believe that an effective approach to mitigation requires the establishment of a mitigation framework that is built into the initial planning for energy and associated infrastructure development and an integral part of the design and development of a specific project. To be effective, a mitigation framework must include efforts to avoid impacts to wildlife and natural resources first, seek ways to minimize any negative effects second, and finally compensate for any unavoidable impacts of a particular project.	The lead agencies' have worked to ensure that the EIS process has developed mitigation based on the precepts you discuss. This includes avoidance of impacts, then minimization of impacts, then compensation for unavoidable impacts as directed by the lead agencies. Proposed mitigation developed based on these framework is disclosed in Chapter 3 and Appendix C of the Final EIS.
Defenders of Wildlife	559-1623	For a transmission project, one of the first and most important steps to avoid impacts is to plan potential transmission corridors so that they are developed within existing corridors, ROWs, on brownfields and other degraded lands, and other areas with co-locating opportunities. Important wildlife movement corridors, landscape connections, and crucial wildlife habitats on lands identified for development are crucial to the current and long-term viability of game and nongame wildlife, especially for providing adaptation options in the face of a changing climate. Depending on the wildlife and landscape, transmission can contribute to loss, fragmentation, and diminished resiliency of these habitats. Consequently, planning and siting to avoid or minimize impacts to the wildlife corridors and landscape connections is very important.	Sections 2.2 and 2.3 of the Final EIS describe the planning and development of the transmission line routes, which have included consideration of designated corridors, existing ROWs, and developed lands, as well as resource concerns.

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Commenter Name	Comment ID	Extracted Comment	Response
Defenders of Wildlife	559-1626	We support Habitat Equivalency Analysis (HEA) methods that precisely define mitigation needed to offset both short and long-term project impacts and benefit affected populations while still maximizing landscape-scale conservation. As presented in our comments on the Gateway West DEIS, Sage-grouse Supplement, and FEIS (attached), actual species habitat use data is the appropriate basis for estimating Habitat Services, the currency of an HEA. Our previous recommendation for the Gateway West Habitat Services Metric (HSM) model was that the predictions of this heuristic, expert opinion-based model be checked against the scientifically rigorous USGS Wyoming Basin Ecoregional Assessment (WBEA) sage-grouse models (Hanser et al. 2011). These models, based on sage-grouse pellet counts taken from surveys across the ecoregion, tested a far more comprehensive set of predictors, including disturbance from transmission lines, and incorporated the spatial scale at which predictors were influential. The approach we recommend for Transwest Express is based on project-specific modeling efforts, similar to the WBEA. The TWE HEA should focus on (1) defining the best model for the purposes of valuing habitat proposed for development (vs. habitat proposed for preservation or mitigation) and on (2) the effects of transmission lines and structures themselves. Restoration methods might also be included in the HEA on an experimental, adaptive management basis, but at this time there is insufficient understanding of their equivalency to habitat loss and degradation to allow full use in HEAs. We oppose the use of an opinion-based approach like that used for Gateway West to assess the impacts of development on sage-grouse, habitat services lost, and resulting mitigation needed for the species; this approach could lead to significant negative impacts on this already compromised species.	Thank you for your comment. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. A technical advisory group comprised of sage grouse biologists and land managers has been instrumental in the development of the HEA. Every effort has been made to ensure that the best available science and policy has been used in development of the HEA model and will be used in identifying compensatory mitigation needs based on model results. Completion of the HEA model is anticipated to be concurrent with the release of the TWE FEIS.
Defenders of Wildlife	559-1627	The BLM must adopt a HEA process that models actual sage grouse habitat use to identify the strongest habitat predictors. The attempt to define them a priori through an expert opinion process lacks sufficient biological realism and is inherently inaccurate. The HEA and all associated data should be available for public review prior to the release of the FEIS.	Thank you for your comment. A technical advisory group comprised of sage grouse biologists and land managers has been instrumental in the development of the HEA. Every effort has been made to ensure the best available science and policy has been used in the development of the HEA model and will be used to identify appropriate mitigation based on model output. It is anticipated that the HEA model will be completed concurrent with release of the Final EIS.
Defenders of Wildlife	559-1628	The DEIS mentions the applicant's commitment to developing an Avian Protection Plan that includes a full listing of all minimization measures included in this EIS. This APP is a critical component of the applicant's proposal and must be made available to the public for comment.	Comment noted. TransWest has committed to project conformance with avian protection standards outlined in the APLIC 2006 electrocution manual in addition to compliance with BGEPA and MBTA. A comprehensive list of avian conservation measures will be outlined in the TWE Avian Protection Plan that is anticipated for release concurrent to the FEIS. No change to text.
Defenders of Wildlife	559-1629	The APP should include consideration of: <ul style="list-style-type: none"> - Adequate conductor-to-conductor and conductor-to-ground space to prevent avian electrocution. - Anti-perching devices, when appropriate, to reduce perching and nesting on transmission structures by avian predators and prevent avian electrocution (Lammers and Collopy 2007, Slater and Smith 2010). - Marking of lines as well as structure guy wires (or use of non-guyed structures) in areas with high avian collision risk. This is particularly important since the default structure type would be a guyed v-string lattice with double overhead static wires, a design that presents multiple opportunities for collision. - Use of single solid tubular pole structures to reduce perching, and relocation of development to less sensitive areas (foraging areas, nesting areas, flyways, etc). 	Comment noted. Conductor spacing for the Project is expected to be 40 - 50 feet, which would eliminate the potential for avian electrocution. The use of alternative tower types, perch discouragers on towers and bird diverters on conductors, static wires, and guy wires has been added to multiple mitigation measures described in Section 3.7.6 and 3.8.6 of the Final EIS. TransWest's APP for the TWE project is anticipated to include a detailed discussion of the suggested avian conservation measures.
Defenders of Wildlife	559-1631	The Avian Protection Plan mentioned in the EIS must be based on a thorough review of available biological data and conservation areas to target areas where mitigation and management is needed, effective measures to counteract impacts, and a public review and adaptive management process to ensure continued effectiveness.	Comment noted. It is expected that TransWest will prepare the TWE APP in collaboration with the lead agencies and the USFWS. Assuming that the APP is prepared in accordance with APLIC/USFWS guidelines, it will employ an adaptive management approach to effectively avoid or minimize avian impacts over the life of the Project. Although preparation of an APP may be mandated by the Project ROD, it is not necessarily part of the NEPA process and, as such, may not be subject to public review and input.
Desert Tortoise Council	696-1841	Whereas there are other alternatives to the west that would avoid impacts to the Beaver Dam Slope critical habitat unit altogether, we understand that every alternative in Region III would impact a substantial portion of tortoise critical habitat. The Council would like the proponent to construct an alternative alignment that avoids all impacts to designated desert tortoise critical habitat.	Because the Southern Terminal is situated within a concentrated area of desert tortoise habitat, an alternative that completely avoids critical habitat is not feasible. However, the alternative locations in the Final EIS maximized the use of designated utility corridors to the extent possible to minimize impacts on desert tortoise. Additionally, Section 3.8 of the Final EIS contains mitigation measures to further avoid or minimize the impacts to desert tortoise.
Desert Tortoise Council	696-1842	As reported in Table 3.15-3 on page 3.15-14, avoidance of the Beaver Dam Slope ACEC would also follow stipulations in the Bureau of Land Management's (BLM) St. George Resource Management Plan, which indicates "...new ROW and temporary use permits are strongly discouraged within the Beaver Dam Slope ACEC." As proposed, the proponent's alternative would affect desert tortoise critical habitats in several places, as outlined on pages 3.15-76 and 3.15-77, and would therefore occur "...within designated ROW exclusion areas" and "...would not be in conformance with area management." We view these disclosures as evidence why the BLM should only approve an alternative that does not violate its existing management plans.	Congressional designation of the Beaver Dam Wash National Conservation Area (NCA) through the Omnibus Public Land Management Act of 2009, excluded the existing utility corridor from the NCA boundaries. Since the applicant's proposed route through the Beaver Dam Wash NCA and Beaver Dam Slope ACEC would be contained in this existing utility corridor where there are existing utilities already constructed, this alternative is considered to be in conformance with BLM's existing management plans for the area. The BLM St. George RMP (1999) specifically states that the Beaver Dam Slope ACEC "will be designated as a right-of-way avoidance area for new rights-of way except in designated utility and transportation corridors" (pp. 2.29). However, BLM recognizes the importance of the desert tortoise critical habitat in this area as well as in southern Nevada and mitigation measure SSWS-4 in the EIS was proposed if this alternative was selected.

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Desert Tortoise Council	696-1843	We note in Table 3.8-43 on page 3.8-118 that Alternative III-C, with the most anticipated impacts to critical habitat, would directly impact 587 acres of critical habitat and indirectly impact 63,104 acres of critical habitat and that Alternative III-B, with the lowest impact, would directly affect 328 acres and indirectly affect 27,525 acres. We cannot tell from the DEIS as written what these indirect impacts are, if they are judged to be significant, and how tortoises on between 27,525 and 63,104 acres of critical habitat, depending on the alternative chosen, may be indirectly affected. How will these indirect impacts to critical habitat be mitigated? We suggest complete avoidance by selecting an alternative alignment that avoids critical habitat altogether.	The methodology for calculating indirect impacts is provided in section 3.7.6.2 Impacts to Wildlife Common to All Alternative Routes and Associated Components (DEIS page 3.7-44). BLM Conservation measures and RMP stipulations regarding Desert Tortoise are provided in Appendix C. Proposed mitigation measure SSWS-4 provides information on consultation and coordination requirements in addition to general avoidance measures that will be considered for inclusion in the Record of Decision by the BLM. Specific terms and conditions regarding Desert tortoise are anticipated to be provided in the USFWS Biological Opinion. No change to FEIS text.
Desert Tortoise Council	696-1844	Other critical habitats would be affected outside BLM-designated corridors (described throughout Section 3.15) and therefore fall within "ROW avoidance areas." We see in the conclusion section for Region III where tortoise habitat is most common (page 3.15-86), that "All alternatives within Region III would result in impacts to SDAs [Special Designation Areas] designated by the BLM for the protection of desert tortoise;" ranging from between 700 and 940 acres within ACECs among the three alternatives. Why was the project designed this way? Since avoidance areas are known and designated, the alignment should be designed within the constraints of existing management and should not ignore them.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach. The draft EIS discloses the worst-case potential for impacts within these SDAs; however, because of the corridor approach used, the actual impact of construction would be much less. As the design progressed and the corridors were narrowed, the maximum amount of avoidance area possible has been removed from the area of direct Project impact.
Desert Tortoise Council	696-1846	Were any field investigations completed during preparation of the DEIS? No biological studies or field data were provided to demonstrate which alternative may have the fewest impacts. The U.S. Fish and Wildlife Service (USFWS) has a tortoise survey protocol developed in 2010 that outlines how proposed linear projects such as this one are to be surveyed. Did USFWS waive the need for the proponent to perform these surveys? The Council feels that more field data are needed to fully document the potential impacts associated with each of the alternatives.	Field surveys utilizing the 2010 USFWS protocol were conducted in October 2013. Data collected will be included in the TWE Biological Assessment under Section 7 consultation with the USFWS. No change to FEIS text.
Desert Tortoise Council	696-1847	The Council acknowledges that there is potential to minimize impacts to desert tortoises at the time of construction in the following mitigation measure (page 3.8-37 of the DEIS), "SSWS-4: To avoid and minimize impacts to the desert tortoise and its habitat, TWE would conduct field surveys in identified desert tortoise habitat following approved USFWS protocols... [and] implement appropriate mitigation measures during construction, including but not limited to, fencing, preconstruction surveys, and relocating desert tortoises." However, we also encourage the proponent to identify, and the regulatory agencies to authorize, an alternative alignment based on existing surveys and other information that avoids tortoise critical habitat and known occupied tortoise habitats, as per the criteria given above.	Because the Southern Terminal is situated within a concentrated area of desert tortoise habitat, an alternative that completely avoids critical habitat may not be feasible. However, alternatives in the Final EIS have maximized the use of designated utility corridors to reduce impacts to desert tortoise. Additionally, Section 3.8 of the Final EIS contains measures to avoid or minimize the impacts to desert tortoise.
Desert Tortoise Council	696-1848	Impacts to desert tortoise listed on page 3.8-117 identify three "potential" and "direct" impacts, but fail to identify indirect impacts and cumulative impacts. Although the third paragraph indicates, "...impacts would be more pronounced within occupied habitat and USFWS critical habitat," and there is a more detailed discussion of impacts on page 3.8-123, there is no detailed analysis of how the proponent's preferred alternative for the transmission line would predictably impact tortoise critical habitat on the Beaver Dam Slope and elsewhere (i.e., Mormon Mesa ACEC, Mormon Mesa – Ely ACEC, Kane Springs ACEC, and Coyote Springs Valley ACEC).	Impacts to special designation areas are discussed in Section 3.15. Beaver Dam Slope ACEC, Mormon Mesa ACEC, Mormon Mesa – Ely ACEC, Kane Springs ACEC, and Coyote Springs Valley ACEC are discussed in Section 3.15.4.5. The impact analysis includes disturbance acreages, discussion of impacts, an evaluation of compliance with special designation management stipulations for these areas, and proposed mitigation to reduce impacts. Indirect impact acreages are detailed in Table 3.8-43; text clarifying the types of potential indirect impacts is located in Section 3.7.6.2, Impacts to Wildlife Common to All Alternative Routes and Associated Components and referenced in Section 3.8.6.1. Cumulative impacts are discussed in Section 5.3.8.2.
Desert Wetlands Conservancy	686-1198	Our concerns start with the fact that the Draft EIS was prepared under the assumption that a 1500 foot minimum separation of the 600KV TransWest Express line from any other line of 345KV or higher would be required. It is now known that only a 250 foot separation is required. Because of the temporary FERC requirement of a 1500 foot line separation the exact route through a number of sensitive and constricted areas is not clearly defined.	Draft EIS alternatives were each defined by a reference line and did consider a 1,500 foot separation criteria based on the WECC reliability criteria at that time. The alternatives analyzed in the Final EIS were revised into preliminary engineered alignments that maximize the use of the current WECC criteria that allows for 250 feet of separation.
Desert Wetlands Conservancy	686-1199	Due to the sensitive nature of the area adjacent to and near the Las Vegas Wash and Wetlands Park is essential to know just what is being planned in order to make useful comments and specify appropriate mitigation requirements. Hence, we feel that a supplemental EIS should be prepared which incorporates the 250 foot line separation requirement and clearly defines the proposed route through sensitive areas and choke points.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. TWE has committed to a 250' separation from existing lines. These revised alignments are presented and analyzed in the Final EIS.
Desert Wetlands Conservancy	686-1201	We also think that the visual impacts of the proposed line need to be seriously addressed. This involves both location and tower design. There is pressure to use tower designs that minimize perching and nesting opportunities for raptors. This usually means monopole designs, which are the most Visually intrusive. Since the existing corridor already contains multiple lines with lattice work towers we see no reason not to use the same design, especially since it minimizes ground disturbance.	The TWE Project proposes to use guyed lattice structures unless another structure is required by engineering constraints, such as terrain, line stability, or turning points, or agency requirements to mitigate resource concerns. The intended use of tower types is described in the Project Description Technical Report included as Appendix D.

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Commenter Name	Comment ID	Extracted Comment	Response
Desert Wetlands Conservancy	686-1202	We are also concerned that the very wide proposed corridor passes through sensitive key habitat for the lass Vegas Bear Poppy, a rare and State of Nevada listed as endangered species with specific habitat requirements. The Sunrise Instant Study Area on the east side of Frenchman's Mountain contains some of the best habitat extant for this species and this line is proposed to pass right through that area. What mitigation is being proposed if the line is approved?	Mitigation measure SS-1 would require surveys, and species-specific mitigation measure requirements for the agency preferred route for special status species including BLM, National Park Service, and Nevada State listed Species. Survey requirements, and species-specific mitigation would be determined by the appropriate land management agency.
Desert Wetlands Conservancy	686-1203	Based on our previous bad experiences with siting decisions on other transmission line projects in the Desert Southwest in general and Southern Nevada in particular we feel that it is imperative that a detailed route (not just a mile wide potential corridor) and specifications on tower design be made public prior to any approvals, since once approved it is virtually impossible to alter the project no matter how damaging the impacts.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach.
Duchesne County Utah, Community Devel Dir	122-85	Table 3.1-10The footnote states that "winter ozone exceedances of NAAQS were recorded in the Uintah Basin during the winter 2010-2011. Area is designated un-classifiable and is treated as attainment." It should be noted in this footnote that there were no documented exceedances of the ozone standard during the winter of 2011-2012. This statement does occur in Section 3.1.5.2 below the table.	As the commenter has noted, this information is already included in the text of the EIS and therefore, a footnote would be redundant.
Duchesne County Utah, Community Devel Dir	122-86	Page 3.4-28, Lines 5-7"Lake Fork (Soldier Creek) is listed as an impaired stream due to elevated TDS concentrations and sedimentation." Why is there a reference to Soldier Creek in this sentence?	The Final EIS will clarify this; there is Lake Fork River in Duchesne County, and Lake Fork (tributary Soldier Creek) in Utah County.
Duchesne County Utah, Community Devel Dir	122-87	Page 3.4-32, Lines 5-9"Lake Fork River (Soldier Creek) is listed as an impaired stream due to elevated TDS concentrations and sedimentation. UDEQ (2010) has requested that the Lake Fork River be delisted.	Clarification will be added to the Final EIS; there is Lake Fork River in Duchesne County, and Lake Fork (tributary Soldier Creek) in Utah County.
Duchesne County Utah, Community Devel Dir	122-88	Page 3.4-32, Lines 5-9Existing crossings of the Duchesne River, Lake Fork River, Soldier Creek, and Lake Fork River (Soldier Creek) exist within several miles or less from proposed new crossings."	Clarification will be added to the Final EIS; there is Lake Fork River in Duchesne County, and Lake Fork (tributary Soldier Creek) in Utah County.
Duchesne County Utah, Community Devel Dir	122-89	Page 3.4-32, Lines 5-9Why is there a Lake Fork River and a Lake Fork River (Soldier creek)?	Clarification will be added to the Final EIS; there is Lake Fork River in Duchesne County, and Lake Fork (tributary Soldier Creek) in Utah County.
Duchesne County Utah, Community Devel Dir	122-90	Table 3.12-14: Suggest replacing "w" with West, "s" with South, "n" with North and "e" with East when naming roads in this table.	The recommended has been made in the FEIS.
Duchesne County Utah, Community Devel Dir	122-91	Table 3.12-14: Cobble Hollow should be Cobble Hollow Drive, Coke Road should be Koch Road, Colman Road should be Coleman Road, Current Creek Rd should be Currant Creek Rd, Utahan should be Utahn.	The recommended change has been made in the FEIS.
Duchesne County Utah, Community Devel Dir	122-92	Figure 3.14-15This figure does not show the Sand Wash – Sink Draw Conservation Easement, which prohibits overhead power lines, in western Duchesne County (affects Route II-A)	Figure 3.14-15 has been revised to include the Sand Wash-Sink Draw conservation easement. The narrative that accompanies Figure 3.14-15 (in Section 3.14.6.4) also describes the prohibitions associated with this conservation easement.
Duchesne County Utah, Community Devel Dir	122-93	Page 3.17-9: There are two references to the Uintah and Ouray Indian Reservation being in Region II in the first paragraph of this section.	The text was revised to eliminate the duplicate reference.
Duchesne County Utah, Community Devel Dir	122-94	Section 3.17 - Throughout: 2009/2010 data is used in much of the Socio-Economic analysis. Newer employment/unemployment and income data is available from sources such as the Utah Department of Workforce Services.	Much regional economic and demographic data are updated frequently. Given the length of time required to prepare, publish, and distribute an EIS, the reporting of somewhat dated information is inevitable. Although the specific values of some metrics may have changed, e.g., lower unemployment rates given the end of the recent economic recession, the comments from the public did not disclose, nor are the preparers of the FEIS otherwise aware of, any major changes in the fundamental socioeconomic conditions in the regions where more current data would alter the overall assessment. Consequently, a decision was made to not update the historical data.
Elam, Ryan	234-259	I recently had the opportunity to skim through the Draft Environmental Impact Statement created by the Bureau of Land Management and TransWest Express. It was an impressive document and I commend you on the thorough nature of the draft. It's impossible to tell you how much it means to citizens in the surrounding region to know the most up to date information on the project.	Thank you for your comment.
Ellis, John	420-620	There's a lot of cultural resources in the area, and some of these will be very difficult to span, even with the larger structures. So I guess my concern is how much flexibility will there be in rerouting the line to go around these cultural resources after the surveys are conducted?	Rerouting the line to avoid an NRHP-eligible site can be accomplished in most terrains. However, if the terrain is steep and therefore, it is difficult to re-engineer the alignment, then avoidance may not be possible. However, cultural resource sites tend to be located in more "hospitable" locations and not on steep terrain. Another means of avoiding a NRHP-eligible site is to span the site, which can be accomplished in most, if not all, situations.
Energy Capital Group, LLC	385-467	Is there a projected start of construction for the TransWest project?	The start date for construction is dependent upon the timing of the lead agencies' Record of Decision (ROD) and Notice to Proceed. The soonest that scheduled construction could begin would be 2015.

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Commenter Name	Comment ID	Extracted Comment	Response
Energy Capital Group, LLC	593-856	ECG holds a lease on approximately 1754 acres of land immediately east of the Intermountain Power Project (IPP) near Delta, Utah. The land is owned by the School and Institutional Trust Lands Administration (SITLA). ECG is using the land to develop and construct a 300 MW photovoltaic solar electric generation facility. The site was chosen for its proximity to IPP, which results in significant cost advantages in interconnection and transmission.	The lead agencies have informed Transwest on the need to coordinate with ECG on their projects that could be impacted by the TWE Project.
Energy Capital Group, LLC	593-857	The DEIS Agency Preferred Route traverses our site and easement to IPP. It will reduce the number of the photovoltaic panels and therefore the earnings of the project. It may also significantly increase the cost of interconnection. The combination of increased costs and diminished energy production will adversely affect the ability of the project to compete with non-renewable sources of energy in the marketplace, which could force the cancellation of the project. The applicant preferred alternative, which runs north and west of IPP, would not impact our project.	Thank-you for your comment.
Energy Fuels Resources (USA) Inc.	576-749	The area of the Baggs Alternate Connector 2-mile wide transmission line corridor includes almost the entire EFR Juniper Ridge Project property.	The Baggs Alternative Connector was removed from further consideration in the Final EIS.
Energy Fuels Resources (USA) Inc.	576-750	Section 3.2.5.1 of the TransWest Express EIS describes the physiography and geology, geologic hazards, paleontological resources, and the mineral resources of the Region I portion of the proposed and alternate transmission line corridors. The mineral resource section of the report lists the potential oil and gas and coal resources. However, it fails to consider, or even mention the substantial uranium resources that are known to occur in Region	The EIS was amended to include discussions of uranium mining districts that are within the analysis area. The revisions have been inserted into Sections 3.2.5.1, 3.2.5.2, and 3.2.5.3.
Energy Fuels Resources (USA) Inc.	576-751	Beginning in 2005 Strathmore Resources acquired Wyoming State Mineral Lease 0-41095 and located the 197 unpatented mining lode claims mentioned above. Energy Fuels Resources acquired Strathmore in August, 2013 and now controls the Project. Well over 5,900 uranium exploration holes have been drilled on or in the immediate vicinity of the Juniper Ridge Project, including 400 holes in 2011 and 149 in 2012. A portion of the 2011 exploration drilling was conducted on BLM land.	There will be no access issues regarding the Juniper Ridge Claims (Poison Basin Uranium Area) because the Baggs Alternative Connector has been eliminated from consideration and Alternative I-D has been moved to the north. However, the text was revised in Section 3.2.5.1 to acknowledge the presence of the potential uranium resources at Juniper Ridge.
Energy Fuels Resources (USA) Inc.	576-752	The Draft EIS draws the conclusion on page 3.2-40 that "The proposed project is not expected to preclude or restrict access to mineral resources". This is incorrect. There will be a significant, negative economic impact to Energy Fuels if a large transmission line is constructed over the top of the shallow uranium deposit planned for open pit mining. The EIS statement on page 3.2- 37, "Impacts to mineral resources would occur if mineral resources of economic value are lost or made inaccessible for future use" is exactly true of the situation at the EFR Juniper Ridge. Therefore, Energy Fuels strongly opposes the approval of the Baggs Alternate Connector corridor.	There will be no access issues regarding the Juniper Ridge Claims (Poison Basin Uranium Area) because the Baggs Alternative Connector has been eliminated from consideration and Alternative I-D has been moved to the north. However, the text was revised in Section 3.2.5.1 to acknowledge the presence of the potential uranium resources at Juniper Ridge.
Energy Fuels Resources (USA) Inc.	576-753	The Draft EIS does acknowledge that uranium is a mineral resource in Region II in Section 3.2.5.2, page 3.2-22. Again, though the EIS does not consider the real uranium mineral potential in the discussion, stating only that "Uranium has been mined in the past in Grand County, but there are no active uranium mines at present" on page 3.2-36. It does not mention the other historic uranium and vanadium producing district that the Alternative II-B and II-C corridor crosses in Emery County, the San Rafael district (also known as the Green River district and the Tidwell district). Small-scale, intermittent uranium mining has occurred in this district on unpatented mining claims on federal land as recently as 2012. EFR has purchased ore from independent producers in the district and processed it at the White Mesa Mill. Furthermore, Energy Fuels has a published resource estimate for a project it holds in this uranium district (NI 43-101 Technical Report on the San Rafael Uranium Project Emery County, Utah, USA Prepared for Energy Fuels Inc. by O. Jay Gatten North American Exploration Inc. Report Date: March 21, 2011. This report is available on Canadian Securities Administrators public documents web site, www.sedar.com). The Alternate II-B and II-C corridor crosses a portion of the EFR property. The uranium mineralization is more than 1,000 feet deep where the transmission line would cross. Historic mining has been and proposed future mining here will be by underground methods.	The EIS was amended to include discussions of uranium mining districts that are within the analysis area. The revisions have been inserted into Sections 3.2.5.1, 3.2.5.2, and 3.2.5.3.
Energy Fuels Resources (USA) Inc.	576-755	However, EFR will state for the record that the Draft EIS for the TransWest Express Transmission Project is inexcusably deficient in the analysis of the effects of the project on economic mineral potential, particularly uranium, on the federal, State, and private lands it may cross in several of the Alternatives.	The EIS was amended to include discussions of uranium mining districts that are within the analysis area. The revisions have been inserted into Sections 3.2.5.1, 3.2.5.2, and 3.2.5.3.

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Enterprise Products	186-543	<p>Enterprise has minimum requirements for overhead transmission lines, which include the following:- Crossings should be as close to 90° angles, but no less than 45°.- If transmission lines run parallel to Enterprise pipeline(s), maintain a minimum horizontal separation of 25 feet between poles and pipelines- No utility poles or guy anchors are allowed within the Enterprise right-of-way- Overhead electrical lines shall be installed so that a minimum of 30 feet vertical clearance is maintained between the lowest point of the overhead crossing and the natural ground level above Enterprise pipeline(s)- Plans and Profiles of project shall be submitted for engineer review and approvals 45 days prior to construction commencement.- No heavy equipment shall cross Enterprise pipelines without prior review. Heavy equipment crossings shall be submitted for review a minimum of 72 hours prior to crossing.</p> <p>Enterprise/Mid-America has identified three (3) pipelines being crossed by the Preferred Transmission Route. However, the Alternative route(s) indicate a significant increase in crossings and potential issues. No crossing approval or additional information can be provided for the transmission line crossings until a route has been finalized.</p>	<p>This information has been forwarded to TransWest. The lead agencies require that TransWest coordinate with landowners and holders of valid existing rights on public land as they complete final engineered siting of the transmission line.</p>
Erekson, Affel	422-621	<p>One of your associates here was listening to our conversation about irrigation, you know, and she looked it up in the book and your study and it said that over this corridor that we were concerned about which is Alternate 2B, there was no pivot lines, which is probably true right now except we just spent \$18,000 on the pumping station. We're just getting the lines in the ground so we could put a sprinkler system in.</p> <p>So what this would do if it went through our corridor would limit the ability to ever put one in, so if there may not be one right now doesn't mean there's not going to be, and this whole area has been forced to turn to sprinkler systems because we keep getting less water. Then it's going to restrict anybody along the corridor, whatever corridor goes through, to put in sprinkler systems. So that was our concern.</p> <p>So the investment we've made so far would be wasted. Doesn't make me very happy. That's why we still believe it ought be put somewhere where there isn't, you know, real irrigation going on whether it's flood, sprinkler system, whatever. The range land is a better alternative than any situation because, you know, there's no artificial watering the land. It's just rain and rangeland.</p>	<p>The analysis does not disclose all areas where pivot irrigation system improvements are in progress or planned. However, mitigation measure AGRI-1 is included to ensure coordination with farm and ranch operators to identify problems with structure placement and determine structure locations to ensure implementation of design feature TWE-40 (which provides for the siting of facilities to avoid conflicts with agricultural activities such as installation of pivot irrigation systems). The subsection in Section 3.14.6.2 (Impacts Common to All) on Agriculture has been updated to acknowledge that although the analysis identified all known instances of pivot irrigation systems, it does not disclose all areas where pivot irrigation system improvements are in progress or planned and that the proposed mitigation AGRI-1 has been developed to eliminate these potential conflicts.</p>
Erekson, Affel and Nezla	421-738	<p>It also reduces the property value, you know, because you can't run a sprinkler system. I've spent \$18,000 this year alone just developing a pumping system so I can run a sprinkler system. Well, you can't put a sprinkler system under these power lines. It creates too much moisture in the area and causes problems for you and for me. And the NRCS, they are the local farmers group that helps us get money and gives us advice about how to develop our farmland. They spent a lot of money in the whole area there helping people put in sprinklers systems. So the farmers I talked to told me the same thing that their big concern is they won't be able to use their sprinkler systems underneath those power lines. So it would destroy the ability of these farmers to farm, and that seems to be the same problem with both 2B and 2D. You know, the preferred one goes mostly over forestland, rangeland, that is only irrigated by rain, and it's not irrigated by pumping stations and sprinkler systems, so that would be the right thing to do in my opinion.</p>	<p>The analysis does not disclose all areas where pivot irrigation system improvements are in progress or planned. However, mitigation measure AGRI-1 is included to ensure coordination with farm and ranch operators to identify problems with structure placement and determine structure locations to ensure implementation of design feature TWE-40 (which provides for the siting of facilities to avoid conflicts with agricultural activities such as installation of pivot irrigation systems). The subsection in Section 3.14.6.2 (Impacts Common to All) on Agriculture has been updated to acknowledge that although the analysis identified all known instances of pivot irrigation systems, it does not disclose all areas where pivot irrigation system improvements are in progress or planned and that the proposed mitigation measure AGRI-1 has been developed to eliminate these potential conflicts.</p>
Erekson, Affel and Nezla	421-740	<p>And then up behind us, the Wood Hollow fire this year was caused from power lines; right. They hadn't properly maintained them. Lightening struck the power pole. The power pole collapsed, broke something. The power pole fell started a fire. It burned like 40,000 acres. It burned 4,600 acres above our house, and we got flooded seven times from the water coming down off the mountain from the fire scar. So it made a real mess. We didn't really have to sue Rocky Mountain, but we were going to, but they spent a lot of money fixing the problem caused by the fire, so it's – so we wouldn't get flooded again.</p> <p>Having those power lines around, it could do it again. They can still arc to the ground and cause fires again, you know. So it's even more important to keep it away from homes.</p> <p>Why have it come down right through where six homes are, where people live, when up behind us this way where the other fire was, there's a big mountaintop where nobody lives. There's already a little power line up there.</p>	<p>A separate section on wildfire was added to the Final EIS as Section 3-21. Additional detail on wildland fire effects were added as appropriate to wildlife, visual, public health and safety, and cumulative impacts. A fire protection plan will be developed as part of TransWest's Construction, Operation, and Maintenance Plan. As appropriate, specific requirements of the fire protection plan were outlined as mitigation in the wildfire section. See Appendix D, part 1 and 2 in the Final EIS for TWE's committed environmental mitigation measures related to fire protection (No-64).</p>

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Escalante Mines Inc.	605-858	The planned transmission lines in this location cross our proposed Elephant Canyon Project mine development in Beaver County, Utah. This presents problems in planning for both your transmission lines and our mine development planning.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Due to the thousands of miles of alternatives, it is not feasible to analyze all of the claims and leases for validity or potential commerciality, or mitigate for all possible situations that may arise with regard to resource conflicts. It is also not possible for the BLM to dictate the terms and conditions in agreements between the applicant and mineral owners or lessees. The BLM will issue a ROW grant that is consistent with applicable regulations but recognizes that the applicant must acquire all access permissions in mixed ownership situations and it is expected that mineral rights conflicts would be resolved prior to construction. The proposed transmission line, when constructed, will occupy a 250-foot wide ROW. The 250-foot wide ROW should facilitate resolution of many perceived conflicts. The terms and conditions of the ROW grant, as specified in 43 CFR Subpart 2801, includes "the right [of the BLM] to require common use of the right-of-way, and the right to authorize use of the right-of-way for compatible uses (including the subsurface and air space)." The BLM recognizes that subsurface activities (in this case, mineral extraction) may not in all cases be compatible with the intended ROW use but as stated above, potential conflicts must be resolved prior to construction. It also should be noted that although many unpatented mining claims have dubious validity, it is the responsibility of the ROW grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners.
Escalante Mines Inc.	605-859	We request a meeting with the planning board or other appropriate person(s) at a time of mutual convenience, either in person or by teleconference. Please inform us of who we need to contact to arrange this meeting. The purpose of this meeting would be to examine the area of conflict in more detail, to provide the necessary corporate information, maps and geologic data you might require to make an informed decision, to determine how the mine development, construction, and operation, and the transmission line construction and right-of-way affect each other, and to work out how this area could be used for both purposes with a small adjustment in location of the transmission lines.	See response to Comment ID 605-858.
Escalante Mines Inc.	605-860	We have no objections in general to the construction of this transmission line. However, we believe that a change of routing of a few hundred feet to the east over this referenced area would not only solve the conflict and problems between the transmission line and mine development, but would also traverse more level ground and less steep, rocky terrain for the power line construction.	The preliminary engineered alignment analyzed in the FEIS was shifted approximately 1,250 feet to the east to be collocated approximately 250 feet from the existing transmission infrastructure in the area.
Etzler, Cindy	189-545	to even consider a renewable source power plant at latitude 42+, and then construct a 700+ mile monstrosity across four states, mainly for the benefit of Las Vegas NV. Is ridiculous, and REEKs of a pay-off. southern tip of Nevada , at latitude32- is one of the premier locations in the continental U. S. for Solar and wind power.	Thank you for your comment. The proposed action is not a BLM- or Western-generated action. TransWest submitted a request to the BLM for a ROW across public lands in order to build a transmission line. As stated in Chapter 1 of the Draft EIS, the BLM's purpose and need is to consider the ROW application in accordance with 43 CFR Part 2800. The EIS process discloses the environmental effects of granting that ROW, including an analysis of alternatives to the proposed route across federal lands. However, it is beyond the scope of the lead agencies' decision to be made, and therefore, this EIS analysis, to identify potential sources of this energy (See Sections 1.1.1.1 and 1.1.2.1 of the Draft EIS).
Etzler, Cindy	189-546	As no public meeting was even scheduled within 25 miles of your (preferred alternate route) we have had a difficult time getting factual data on your(political spin) brochure. What a surprise!	The BLM and Western held 13 public meetings during the Draft EIS comment period. Most of the meetings were along the route of the agency preferred alternative. In the area where the commenter appears to have a concern, meetings were held in Cedar City, Utah and Panaca, Nevada. These locations were chosen because they were centrally located to facilitate attendance for concerned citizens in the area and had meeting facilities large enough to accommodate the expected number meeting attendees. Project information, including the Draft EIS, was also available on the BLM website.
Ewing, Parke	196-248	Please consider extending the comment period for the proposed Trans West project by at least another 60 days. This existing short comment period does not allow many of us to adequately research the proposal.	The BLM determined that a 90-day comment period was sufficient for comment on the Draft EIS and declined to extend the comment period further. Please note that a 90-day comment period is double the required comment period required for EISs for site-specific projects and meets the requirements for comment periods for EISs analyzing land use plan amendments. These requirements are detailed in the Council of Environmental Quality Regulations for the Implementation of the National Environmental Policy Act (CEQ regulations), the BLM NEPA Handbook (H-1790-1), and the BLM Land Use Planning Handbook (H-1601-1).
Federal Highway Administration-NV Div	193-548	I did want to point out that the Boulder City Bypass will soon be built on an alignment that was selected in our FEIS in 2005. The four-lane freeway was recently designated I-11, and will meet Interstate design standards as it connects I-515 with the Hoover Dam Bypass. Construction will begin in 2014, with utility relocation already underway.	This project was added to the list of reasonably foreseeable future activities analyzed in Chapter 5.
Federal Highway Administration-NV Div	193-549	I believe both projects can be delivered at the same time, in the same place, if we coordinate our activities. We may have additional input for other portions of the TransWest alignment in Nevada, but Boulder City looks to be the most significant segment.	The potential conflicts between TWE and the Boulder City Bypass and the subsequent potential cumulative impacts were added to Section 5.2.4.2. The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach.
Friends of Northwest Colorado	567-1632	We developed extensive comments for the scoping phase of this project. Unfortunately we believe that most of these comments are still valid due to in adequate analysis and limited justification for exclusion of alternatives.	Thank you for your comment.

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Friends of Northwest Colorado	567-1633	<p>Case in point, although we appreciate the BLM's attempt to conduct inventories of the significant acreage of potential LWC lands in this area, the BLM inventory for the LSFO was hastily done and contains many errors. The inventory was not made available to the public until Tuesday September 10th, less than three weeks before the comment period deadline for this particular project. 20 days concurrent with the release of two other EIS (Colorado Greater Sage Grouse & Transwest) is insufficient time for the public to analyze the inventory, including conducting site visits to assess the inventory's quality, in time to create substantive and meaningful comments on this DEIS. Inventory must be corrected and full inventories completed for all affected units, including WSA-adjacent units and the public given ample time to comment before decisions are made that could affect wilderness characteristics of these units.</p> <p>Due to the significant errors in the LWC inventory conducted by the LSFO and TWE contractors in addition to the lack of adequate time provided by BLM for the public to analyze the LWC inventory in combination with BLM's refusal to grant a comment period extension leads us to the conclusion that BLM must conduct a Supplement to this EIS.</p>	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change, much less give rise to a supplemental EIS for this Project. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS, which has since been made available for public review, and that information has been incorporated into the Final EIS.
Friends of Northwest Colorado	567-1634	BLM must not include any routes in citizen-inventoried lands with wilderness characteristics as areas open for transmission line development and must be careful not to infringe on the view sheds for these landscapes. Several of corridors in scoping would intersect with Wilderness Study Areas and/or Citizens' Wilderness Proposals (CWPs), specifically – Cross Mountain, Yampa River and Black Mountain/Windy Gulch.	Citizen Proposed Wilderness (CPW) areas are conducted by independent groups without oversight from the agencies that manage those lands. While the BLM does consider CPW areas in their wilderness character inventories and land use planning processes, only official designations of these areas by the land managing agencies have been used in the Special Designation Area analysis. Impacts to WSAs are disclosed in Section 3.15 of the DEIS. As identified in Table 3.15-1, the Oil Spring Mountain and Demaree WSA are the only WSAs located within Colorado that are within the analysis corridor. Map 3.15-5 also identified WSAs that are near but not within the analysis corridor by "greying out" the WSA. As shown on this map, the Cross Mountain WSA is located to the west of the analysis corridor.
Friends of Northwest Colorado	567-1635	We ask the BLM to avoid ALL routing through WSA, CWP, SWA, Dinosaur National Monument and conserved lands. The only way to do this is to avoid Northwest Colorado.	Special designation areas have been considered in the routing of the Proposed Action and alternatives. Any areas that legally preclude transmission lines have been excluded from consideration. Given the length of the proposed transmission line, it is not possible to avoid all special designation areas. Impacts to special designation areas have been disclosed in Section 3.15 of the Draft EIS.
Friends of Northwest Colorado	567-1636	We feel that a route avoiding western Colorado could be accomplished in many ways. Firstly by using the power more regionally either to supply Wyoming needs or for market to Colorado's East Slope (Fort Collins, Denver, etc...). If this is not commercially feasible, then we believe there are already disturbed lands along I-80 from Wyoming and going further west into Utah and down along Hwy 191. This route would avoid sensitive species and lands, keep the corridor to areas already disturbed and still allow for geographic redundancy in the line.	Section 2.7 of the Final EIS was revised to provide the rationale for the elimination of the Western Wyoming: Rock Springs alternative route from detailed analysis.
Friends of Northwest Colorado	567-1641	The proposed corridors may also infringe on Colorado Natural Heritage Program Conservation Areas (CNHP PCAs) that have very high or outstanding biodiversity significance and support occurrences of globally imperiled or globally critically imperiled species. Among the CNHP species we would be most concerned that the routes being scoped would intersect occurrences of the Gibben's Penstemon (<i>Penstemon gibbensii</i>) and Narrow-leaf Evening Primrose (<i>Oenothera acutissima</i>). The Gibben's penstemon is globally critically imperiled and the BLM is one of the few landowners with occurrences of this plant. The U.S. Fish and Wildlife Service is currently considering protecting the Gibben's penstemon under the Endangered Species Act. Similarly, the narrowleaf evening primrose is imperiled across its range and has a significant proportion of its known occurrences on LSFO BLM lands. Both species are BLM sensitive species. The CNHP PCAs that support these species have been nominated for ACEC designation through the RMP planning process. Further, routes intersect element occurrences of globally/state critically imperiled or imperiled species or natural communities tracked by the Colorado Natural Heritage Program.	Although impacts to Colorado Natural Heritage Program Conservation Areas are not specifically analyzed in the EIS, the species that are referred to above (as well as BLM ACECs) are included. Narrowleaf evening primrose was eliminated from further analyses; see Appendix G, Table G-1. Gibbens pestemon has been analyzed in the EIS, See Section 3.6. The applicant committed measures, land management agency requirements, USFWS requirements, and the additional mitigation will be implemented to minimize impacts to sensitive species. The impact discussion under impacts common to all alternatives addresses the impacts to sensitive species related to direct and indirect impacts.
Friends of Northwest Colorado	567-1642	Roads, road maintenance and traffic can cause direct mortality of rare plant species, and other rare and imperiled species. In cases where there are an extremely limited number of occurrences of a given species (such as is the case with Gibben's penstemon and narrowleaf evening primrose), destruction of a relatively small number of individual plants, as a consequence of road maintenance activities or crushing by vehicles, can threaten the persistence of the species. Roads, road maintenance and traffic can also have indirect effects to occurrences of rare plants and other rare and imperiled species, including impacts associated with dust, increases in invasive species, and increased off-road vehicle use.	Section 3.6 of the EIS contains analyses that disclose the impacts discussed above. The impact discussion under Section 3.6.7.2, Impacts Common to All Alternative Routes and Associated Components addresses the impacts to sensitive species related to direct and indirect impacts. The applicant committed measures, land management agency requirements, USFWS requirements, and the additional mitigation will be implemented to minimize impacts to sensitive species.
Goble, Tom	427-633	Nephi Canyon - My main concern is the number of power lines that will be going through. There's already three major power lines that go through the canyon here, and the secondary line and three more proposed power lines. And the first meeting I went to said they don't like to congregate a lot of power lines in the same area in case there's a natural disaster. It affects more people. So I'm wondering why we're putting so many power lines in the same canyon.	Section 2.2 of the Draft EIS describes the reliability criteria being used in developing the Project. This minimum criteria would still be met with the multiple lines in Nephi Canyon. One of the reasons the proposed alternatives use Nephi Canyon is that it already has existing transmission lines and this route would minimize impacts to greenfields (undeveloped areas).

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Goble, Tom	427-635	On this property up the canyon where there are two power lines that go through together, I can sit on the ridge of the mountain on my four-wheeler and get shocked by the power lines being overhead, so that's also a concern, and the same thing happens out south now.	Public health and safety is discussed in Section 3.18 of the Draft EIS. Efforts to reduce the risk of shock are reflected in Design Features 49, 50, 52 and 54. These Design Features are outlined in Appendix D. Additionally, as stated on page 3.18-11 of the Draft EIS, all metal irrigation systems and fences that parallel the AC portion of the transmission line for distances of 500 feet or more and are within 300 foot of the centerline would be grounded. Also, all fences that cross under the AC portion of the transmission line would be grounded. As a DC line, the TWE transmission line would not result in induced currents and stray voltage.
Goldberg, Susan	173-236	I am awestruck by the thousands of pages of detail in the Draft EIS discussing and disclosing every possible impact of the TransWest power line; its very thorough and I thought the summary section, summary tables and maps were excellent.	Thank you for your comment.
Governor of Wyoming	590-849	The BLM selected a preferred route and this helps everyone -especially the public -to make informed comments	Thank you for your comment.
Governor of Wyoming	590-851	I recommend the BLM re-route the southern portion of Alternative 1-A in Sweetwater County to cross a non-contributing section of the trail. This is an important, but modest, modification to the Alternative.	Alternative 1-A was adjusted for the Final EIS by TransWest to cross both the Overland and Cherokee trails in non-contributing segments.
Governor of Wyoming	590-852	During the initial development of the DEIS, the BLM analyzed alternative connector routes. These routes are not formal alternatives, but allowed the BLM to make adjustments if substantial conflicts arose during analysis. The BLM found no substantial impacts with Alternative 1-A. I recommend the alternative connector routes be eliminated from further consideration. This avoids unnecessary review and keeps focus on the project and the chosen alternative.	The alternative connectors in Wyoming that you reference were eliminated from further consideration in the Final EIS.
Great Basin Transmission, LLC	574-946	As provided in the description of the Proposed Action and Action Alternatives, and as displayed on several maps within the Draft EIS, the TransWest Express Project is analyzing transmission alignments and substation locations that are in close proximity to the ON Line right-of-way and planned SNIP right-of-way. The location of the SNIP and ON Line facilities must be considered when determining the location of the TransWest Express Project elements. a. Any proposed substations, interconnections, or transmission alignments that cross the right-of-way for SNIP or ON Line need to be coordinated in advance with GBT in the case of SNIP, or in the case of ON Line both GBT-South and NV Energy. b. For those areas where proposed alignments of the TransWest Express Project will parallel the SNIP and/or ON Line right-of-ways (such as Alternatives 111-C and IV-A), GBT-South requests that BLM consult with and obtain the concurrence of GBT (in the case of SNIP) or GBT-South and NV Energy (in the case of ON Line) regarding the separation distance between parallel alignments before issuing any land use decisions.	This comment has been provided to TransWest for additional coordination efforts between the proponents. Separation requirements from existing transmission have been developed by TransWest through application of the NERC and WECC reliability standards as discussed in Section 2.2 of the Final EIS.
Great Basin Transmission, LLC	574-947	GBT requests that any land use decisions that are issued as a result of the proposed TransWest Express Project be subject to the SNIP and ON Line rights-of-way.	TWE has committed to a 250' separation from existing lines, which could include both the SNIP and ON Line projects. TWE recognizes that these projects are likely to begin or complete construction before TWE. TWE's corridor narrowing approach provides flexibility to adjust to the final layout of these transmission lines. The need for all transmission line projects (including SNIP and ON Line) to efficiently plan in a way that will support future sitings is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". Appendix D of the Final EIS includes the revised Transmission Line colocation Framework, which provides additional information on the colocation of the Project within corridors with existing transmission lines. The TWE construction POD will include site-specific alignments and will consider incorporate the SNIP and ON Line rights-of-ways into the TWE design as they become finalized.
Great Basin Transmission, LLC	574-948	Section 3.14.4.2 on page 3.14-7 discusses co-location of facilities and the need to consult with counties and BLM FO's. Consultation with owners of existing facilities in the proposed co-located corridors as well as will sponsors of reasonably foreseeable future co-located facilities is also of critical importance. Such parties should have a seat at the table during the county and BLM FO consultations.	Section 3.14.4.2 of the Final EIS was revised to identify the need to consult with owners of existing facilities and applicants for reasonably foreseeable proposed collocated facilities.
Great Basin Transmission, LLC	574-949	Section 5.2.3.1 discusses past and present actions in Region III. The second bullet on page 5-11 should recognize that there are at least four natural gas fired generation facilities in the Apex industrial area: Harry Allen, Silverhawk, Apex, and Chuck Lenzie. The first bullet on page 5-13 should identify ON Line which began construction in 2011 and will be completed in 2013.	Those existing natural gas fired facilities that impact the same resources as the Project were added to Section 5.2.3.1 of the Final EIS. Additionally, the Final EIS was revised to incorporate your suggested addition regarding the ON line.
Great Basin Transmission, LLC	574-950	Table 5-8 on page 5-15 identifies reasonably foreseeable future actions in Region III. The description in the 2nd row should be corrected to say "Great Basin Transmission South & NV Energy -ON Line 500 kV AC transmission line from Robinson Summit Substation in White Pine County, Nevada to Harry Allen Substation in Clark County, Nevada (in service 04 2013)." The corresponding construction timeframe is 2011-2013.	Table 5-8 in the Final EIS was corrected to incorporate your comment.

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Great Basin Transmission, LLC	574-951	Table 5-11 on page 5-19 identifies reasonably foreseeable future actions in Region IV. The description in the 2nd row should be corrected to say "Great Basin Transmission-Southern Nevada Intertie Project (SNIP) 500 kV AC transmission line from Harry Allen Substation to Eldorado Substation." The planned construction start date is as early as 2014.	The text was edited to reflect the comment.
Great Basin Transmission, LLC	574-952	Section 5.3.14.2 discusses cumulative impacts for Land Use. The fourth bullet on page 5-44 that discusses Segments of Alternative 111-C should reference ON Line rather than SWIP. The fifth bullet that references Alternative IV-A should reference SNIP and ON Line rather than SWIP.	Thank you for your comment. The section and bullet were revised in the Final EIS to incorporate your comment.
Great Basin Transmission, LLC	574-953	Section 5.3.15.2 discusses cumulative impacts for SDAs. The fourth bullet on page 5-49 incorrectly references "Great Basin/NV Energy." As reflected in comment #6 above, Great Basin Transmission is the sole sponsor of the SNIP project that crosses the Sunrise Mountain ISA.	Thank you for your comment. The section and bullet were revised in the Final EIS to incorporate your comment.
Great Basin Transmission, LLC	574-954	GBT would like to commend the efforts of those who were involved with the development the TransWest Express Draft EIS.	Thank you for your comment
Great Salt Lake Audubon	582-867	Please clarify what "applicable areas" means (Appendix C, TWE-30), in terms of applying "Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (Avian Power Line Interaction Committee (APLIC) 2006)" to design of the transmission line. GSLA believes the entire length of transmission lines should be held to the highest minimizing and mitigation standards, particularly measures outlined in APLIC (2006) to reduce avian fatalities.	Comment noted. The language of applicant committed measure TWE-30 takes into consideration that site-specific engineering requirements may preclude the ability for certain elements of the project to be entirely consistent with APLIC guidelines. Full determination of project consistency with APLIC guidelines would not be possible until final project siting and engineering are completed following the Record of Decision.
Great Salt Lake Audubon	582-868	Many of the proposed alternative routes bisect or are in close proximity to Important Bird Areas (IBAs). GSLA believes, especially in these areas, the highest standards of avoidance, minimization, and mitigation should be employed and include use of approved bird diverters.	Comment noted. TransWest has committed to project conformance with avian protection standards outlined in the APLIC 2006 electrocution electrocution manual. Conformance with BMPs and design standards outlined in the APLIC 2012 collision manual is proposed in additional mitigation measure WLF-8. The use of bird diverters in IBAs and BHCAs crossed by the transmission line is proposed in additional mitigation measures WLF-5 and WLF-7 described in Section 3.7.6 and summarized in Appendix C, Table C.5-1 of the Final EIS. To the extent that implementation of these measures is mandated by the ROD, they will be outlined in the TWE Avian Protection Plan and Biological Protection Plan per TWE-32. No change to text.
Great Salt Lake Audubon	582-869	On Page 3.7-37: WLF-1: For the protection of breeding migratory birds, WLF-1 requires TWE to avoid migratory bird habitat removal on currently undisturbed lands, to the extent possible, between approximately February 1 and July 31 (depends on state) or, alternately, to conduct breeding migratory bird surveys and implement appropriate mitigation in coordination with the BLM, Bureau of Reclamation, CPW, NDOW, UDWR, USFS, USFWS, Western, and WGFD. In addition, in order to avoid impacts to raptors during the breeding season (January 1 to August 31 for most eagles, hawks, falcons, and owls and April 15 to September 15 for burrowing owls), TWE would be required to conduct a breeding raptor survey and implement appropriate mitigation measures, such as buffer zones around active nests, as needed. GSLA requests the term "undisturbed lands" be clarified. GSLA believes that all mitigation measures should be conducted on all types of lands, not just "undisturbed lands." There are species of migratory birds (e.g., killdeer) that breed in lands that could be categorized as "disturbed" and these areas should not be discounted.	WLF-1 has been revised to apply to all lands that would be affected by construction activities and have potential to support nesting migratory birds, regardless of existing disturbance levels and land ownership. WLF-2 has been added to the Final EIS to provide similar protection for nesting raptors.
Great Salt Lake Audubon	582-870	Please include minimization and mitigation measures that will be used to reduce the potential for a bird downing at project facilities due to facility lighting. Migratory birds (e.g., migratory passerines, grebes) may be downed in large numbers due to the lighting of facilities.	Additional mitigation has been proposed in the FEIS to ensure that all ground facility lighting is shielded to prevent light from extending above the horizontal plane.
Great Salt Lake Audubon	582-872	GSLA is concerned that with expanded transmission in the region, energy development will increase and certain indirect impacts have not been properly analyzed in the DEIS to account for this. For example, with an increase in wind energy development, there will be an increase in bird and bat fatalities due to collisions with wind turbines. GSLA is concerned with golden eagle fatalities at wind farms in the west and this needs to be addressed in the DEIS under indirect and cumulative impacts. Please include a review of Pagel et al. (2013).	The information requested is already provided in Section 2.1.1 Proposed Action (DEIS page 2-1). Section 2.1.1 formally states that "The proposed Project has the capability to transmit power generated by existing and/or reasonably foreseeable renewable or non-renewable sources in Wyoming. These include a variety of proposed wind projects, which are analyzed in detail in separate NEPA analyses and whose cumulative impacts, if applicable, are disclosed in Chapter 5.0 of the Final EIS. It is important to note that none of these projects are exclusively dependent upon this proposed transmission line, nor is this transmission line dependent exclusively on any of those projects."
Greenberg, Bill	118-79	I have concerns of the impact on Equestrian Park (north of Equestrian Drive – East of Magic Way – Extending to the River Mountain Loop Trail on the foothills of River Mountain). The current proposal shows that the power lines will be east of Equestrian Park and River Mountain Loop trail at this area. Building it any further west would go through the park – ruining a treasure utilized by most people in the neighborhood and throughout Henderson.	The analysis corridor and potential disturbance areas do not include Equestrian Park. The potential disturbance areas outside the corridors includes 0.3 miles of the Equestrian North Trail and 0.1 miles of the Equestrian Trail, in the area where these trails join the River Mountains Loop Trail. The transmission line would cross the River Mountains Loop Trail four times, but generally would run east of the loop trail and the equestrian trails. Application of mitigation measures REC-2, REC-5, REC-6 and REC-7 would reduce impacts to the trails and non-motorized users from construction and operation by limiting access to existing roads, closing or rehabilitating new access roads, limiting construction times, ensuring access to the trails is not impeded, and locating ancillary construction areas away from developed recreation areas.
Greenberg, Bill	118-80	I am also concerned about the building of new access roads through the foothills east of Equestrian Park – which will inevitably be used by off road bikers – greatly impacting the visual beauty of the River Mountains.	Any new access roads built to accommodate the project will have been approved on a case by case basis in consultation with the BLM and local governments.

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Greenberg, Bill	428-636	According to your map online, your project lines cut right through Equestrian Park, which is just north of Equestrian Drive, just east of South Magic Way, and the park extends to the trail on the foothills of River Mountain. So we're concerned that the lines go east of Equestrian Park and the River Mountain Loop Trail. The maps I just saw indicate that is the case, but since there's a two-mile corridor, we want to make sure that it doesn't impact Equestrian Park and River Mountain Loop Trails.	The refined transmission corridor does not include the Equestrian Park, Equestrian Trail or Equestrian North Trail. The potential disturbance areas outside the corridor includes 0.3 miles of the Equestrian North Trail and 0.1 miles of the Equestrian Trail, in the area where these trails join the River Mountains Loop Trail. The transmission line would cross the River Mountains Loop Trail four times, but generally would run east of the loop trail and the equestrian trails. Application of mitigation measures REC-2, REC-5, REC-6 and REC-7 would reduce impacts to the trails and non-motorized users from construction and operation by limiting access to existing roads, closing or rehabilitating new access roads, limiting construction times, ensuring access to the trails is not impeded, and locating ancillary construction areas away from developed recreation areas.
Greenberg, Bill	428-637	And then my last concern is that if roads have to be built to access the building of the power lines, that there's a visual impact for that neighborhood, and also off-road bikes are going to use any roads that are built, and that also greatly impacts the visuals of the neighborhood.	As stated in Section 3.13.6.8 on DEIS page 3.13-34, project access roads would be evaluated on a case-by-case basis by the appropriate federal or state land manager to determine whether to close roads to the public, close and reclaim roads, or leave roads open as part of the transportation network. The text acknowledges that closed roads may be an attractive nuisance and lead to unauthorized OHV use and associated resource damage, noise, etc. Other deterrents such as barriers, contouring, and revegetation may be used to indicate closed roads as determined on a site-specific basis depending on site-specific needs, management requirements, and reasonable application of the treatment.
Greenberg, Paul	172-235	I noticed further up the line in Utah, though, it looks like you moved the transmission line out of public land forested corridors, which doesn't make any sense or follow your siting criteria? If you keep this Transwest power line next to the other power lines already going through the public land in Utah forests, that way people wont see this line as much, plus the line stays the shortest and saves us more money. I don't think it is logical or fair for the federal government to spend taxpayer time and money doing contortions to invent new and more costly transmission line routes until you are sure there is no more room next to the existing transmission lines, which your Draft EIS fails to prove.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Grover, Frank	429-638	I was principal author of the second environmental statement prepared by the Forest Service back in 1970 or something like that, so I'm familiar with the process, and I appreciate the efforts are being made at this time.	Thank you for your comment.
Grover, Frank	646-926	A two and one half mile wide corridor makes it difficult to identify areas of concern which could be affected by construction activities. A case in point is the Nine Mile location of Indian pictographs.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. This corridor approach allows for flexibility in adjusting or moving the transmission line to avoid areas of concern and/or significant cultural resources such as pictographs you refer to. This avoidance would be guided by site-specific natural and cultural resource surveys conducted prior to project construction. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach.
Grover, Frank	646-929	North of Nephi, any location adds to the "picket fence" for a few miles adjacent to Mt. Nebo Wilderness. This location is the first of three proposed for this vicinity and is the first of visual cumulative effects. Although it is on private land, there should be a consideration in securing a ROW because it precludes an increased value for subdivision or other future change of use.	Federal land use management policy regarding wilderness is that there are no external buffer zones/areas relative to a wilderness boundary regarding use, noise, development, or visual character. In other words, the likelihood that an activity occurring outside a wilderness can affect the experience within a wilderness is not germane. With respect to the second point, the successful negotiation of a ROW or easement with an affected landowner resolves the direct effect of the transmission line on land use. The potential effect of the transmission line on future development patterns is addressed in Section 3.14 Land Use. In and of itself, construction of a line does not preclude future subdivision or changes in land use although some particular uses may be incompatible with a power line. Whether the market would exist for such use is speculative and raises the possibility of enhancing the value of other property for the same use. Consequently, the net effect is unknown.
Grover, Frank	646-930	I have enclosed a copy of a business card of an organization who locates raptor nesting activities. They have located a red-tailed hawk's nest about two miles north of Nephi and east of 1-15. This nesting site should be protected during nesting activity by avoiding construction during this time.	Thank you for your comment and information. Raptor nests will be surveyed prior to construction and nest protections and buffers will be applied to nests determined to be active during that season. No change to FEIS text.
Hafen, Brent	430-642	The other one is, once the power line is in, if they leave a maintenance road along here, we end up with tons and tons of people on those roads. And it just seems like people have no respect for BLM property or private property. And, our area, one of the things we love about our area is we have a little bit of seclusion. But, lately, the more and more roads and four-wheelers and all of that kind of stuff that come out, we have just noticed a lot of problems with people coming into those areas.	Revisions to Section 3.16 further clarify the Road Analysis Plan review and approval process. Specific roads that remain open and closed will be determined by local, state and federal Road Access Plan review decisions.

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HawkWatch International	570-1193	Hawk Watch International (HWI) is a 501(c)3 non-profit science-based raptor conservation organization. We have specific information regarding raptor nesting, migration and winter use for areas that are directly impacted by much of this transmission project, including southern Wyoming, Northwestern Colorado, and a large portion of the proposed project corridor through Utah. Because our organization focuses on entire landscapes, and has worked with BLM field offices throughout the region, we have a large dataset comprised of historical raptor nesting records that encompasses much of the proposed region. We urge Transwest to consult with us, and other non-governmental organizations that have similar histories of landscape-scale monitoring of wildlife populations (e.g. Rocky Mountain Bird Observatory, Audubon) to gain a better understanding of the cumulative impact of construction and strategies to avoid disturbance during construction, throughout the project life and decommission. All proposed alternative routes for the project could have impacts on local raptor populations, and so it is absolutely imperative that the applicant thoroughly investigate historical nesting records, current nesting birds (within the same time-frame as construction), migratory patterns, and landscape use to develop their APP or BCS (Avian Protection Plan and/or Bird Conservation Strategy). We would like to commend the project applicant on their commitment to creating a sound strategy for minimizing and mitigation disturbance to raptors.	Comment noted. The lead agencies would have welcomed the opportunity to review and potentially utilize data provided by HawkWatch and other NGOs in refining and augmenting the raptor and other migratory bird analysis between Draft and Final EIS. Unfortunately, calls and e-mails made to HawkWatch by the NEPA contractor were not returned. TransWest is including a draft APP in the revised POD, which will be appended to the Final EIS and therefore subject to public review prior to issuance of the ROD. It is expected that the final APP will be completed in collaboration with the USFWS and lead agencies prior to any Notice to Proceed being issued.
HawkWatch International	570-1194	When analyzing the impacts on raptors, we have specific suggestions about timing and duration of surveys to be completed. With respect to nesting season, we advise the applicant to complete thorough surveys within 1 mile of the final project corridor as close to construction time as possible. Multiple-year surveys would be best, as it is well documented that most raptor species will use different nests in consecutive years, and will often skip years between nesting events and use. At the very least, areas of the project with continual activity (e.g. transformer stations, etc) that may create sustained disturbance through the life of the project should be thoroughly surveyed for nests for more than one year, to ensure the least amount of disturbance to nearby populations. We would also like to urge the applicant to consider completing year-round surveys for raptors, as fall and spring migrating and over-wintering birds may be impacted in areas near the corridor. HWI has extensive knowledge of migration trends from over 30 years of experience, and are currently ground-truthing a model that predicts important ridgelines for migrating birds. The winter is often an overlooked season for analyzing impacts to raptor populations. This can be problematic due to the fact that during this season, raptors are non-territorial, and therefore will occur in higher densities in areas of high resources. It is often over the winter that more mortalities occur due to electrocution or collision.	Thank you for your input. Per applicant-committed measure TWE-30, TransWest has committed to meeting or exceeding the raptor-safe design standards contained in APLIC 2006. Proposed mitigation measure WLF-8 would commit the project to conforming with APLIC (2012) guidelines to minimize avian collision risk. Implementation of mitigation measure WLF-2 would avoid or minimize Project-related impacts to breeding raptors. TransWest has also committed to collaborate with the USFWS in preparing an APP, which would be expected to further assist TWE in avoiding and minimizing impacts to raptors and other migratory birds year round throughout the life of the Project.
HawkWatch International	570-1195	While the Audubon IBAs and USFWS BHCRs are an excellent way to analyze and determine strategy for minimizing impacts to birds, we feel that concentrating more resources to these areas might neglect impacts to many raptor species that do not occur there. These IBAs and BHCRs often focus on important water habitats (e.g. riparian, lakes, wetlands, etc.). These habitat types are indeed important for some raptors, including Northern Harriers, Osprey and Bald Eagles, over-emphasizing these habitats would potentially overlook impacts to other raptor populations that are associated with upland habitat types, such as the Golden Eagle, a species of increasing regulatory and conservation concern due to potential population declines throughout the West.	Thank you for your comment. Analysis of impacts to IBAs and BHCRs are just two of the metrics used to assess impacts to migratory bird species. Additional metrics specific to raptors include the number of known raptor nests within one mile of the analysis corridor and the acres of direct and indirect impacts to raptor habitat contained in the habitat crosswalk analyses presented in Section 3.7 and 3.8.
HawkWatch International	570-1197	As stated in the EIS document, lattice towers with guy lines present a bigger danger for bird collisions. As such, we urge adoption of the self-supporting steel lattice tower or tubular steel tower to avoid guy lines which increase the chances of avian collision, as outlined in the document.	Comment noted. Tower design is determined on a site-specific basis and includes multiple resource considerations alongside engineering/safety/reliability criteria. No change to text.
Hiatt, John	431-645	The BLM approved or the BLM preferred alternative which goes through virgin country does not follow any existing corridor. I think that's a really terrible idea. It contradicts the Ely District Resource Management Plan, and it contradicts all BLM planning processes in which they normally follow existing corridors wherever possible, and this is clearly a case where they could follow the existing corridor and have chosen not to.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Hillewaert, Shawn	384-585	Please rapidly complete the EIS process so construction can move forward, thereby creating jobs for Wyoming residents and others in the West. I would also suggest that you provide more detail in the Final EIS regarding the property tax revenues that will become available to Carbon County and Wyoming schools because of this project.	Additional information provided by TransWest regarding estimated property tax payments appears in Section 3.17.5.
Hillewaert, Shawn	384-586	The Draft EIS analysis is quite detailed and I appreciate all of the information provided.	Thank you for your comment.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Howard, Eula K.	433-651	Well, my concern is that we don't want that high powered line to go through our property because we run cattle out there and they don't like all that electricity. And then if it's there, why then the property is no good really because nobody wants to buy property that's got those high powered lines on it. I know that when we go up around sometimes where they are, you can just feel that electricity. Your hair stands on end. My hair stands on end now too.	Section 3.18 of the Draft EIS (Human Health and Safety) discusses impacts from electric and magnetic fields (EMF), which may include body hair movement and discomfort from spark discharges. As a DC line, the TWE transmission line would not result in induced currents and stray voltage.
Howk, Todd	587-916	your Draft EIS already discloses all of the potential environmental impacts there could possibly be.	Thank you for your comment.
IBEW - Eighth District	126-102	we applaud the very thorough and thoughtful analysis and appreciate the extensive 90-day comment period, which provides the public with more than adequate time to review and to provide substantive comments.	Thank you for your comment.
IBEW - Eighth District	126-104	The Final EIS must also be corrected to note that the "Tuttle Ranch Conservation Easement" language does in fact prudently and thoughtfully allow for new transmission lines to be built in the easement area, "where the State provides prior written approval." The footnote on page 3.14-34 and other references in the document incorrectly state "overhead transmission lines prohibited" in the Tuttle easement area.	The footnote in Table 3.14-11 was updated to indicate that transmission lines may be allowed in the Tuttle Ranch conservation easement when the State provides prior written approval, with a citation to Moffat County Reception No. 20124279. The resulting analysis language contained on page 3.14-36 and elsewhere was also revised accordingly.
IBEW - Local Union #322	204-564	In the first place, the Draft EIS findings do not at all justify moving the line to places like 1-D where your scientific analysis obviously shows there would be more impacts on wildlife- habitat, more impacts on sage-grouse, more issues with soils and erosion, will cause more surface disturbance, cross more historic properties and trails, and have significantly more visual impacts on the people who live and travel in these counties compared to Alternative 1-A. It's also just longer, and while I don't mind building more miles of line, I know it will cost more too, and it is not fair to saddle ratepayers with higher energy costs when it is not necessary or backed up for any environmental reasons.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
IBEW - Local Union #322	204-565	In the second place and actually more important, I know that the county commissioners of Carbon County Wyoming, Sweetwater County Wyoming and Moffat County Colorado came together in the summer of 2011 to study all of the routes in their counties, and they specifically and jointly selected Alternative 1-A as the best place for the TWE Project. It seems wrong and also, quite frankly, insulting to completely ignore the wishes of the local people. If you choose a route that the local people don't support, then it seems you are deliberately trying to introduce more risk of project delays and more controversy unnecessarily	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
IBEW - Local Union 57	573-944	The TWE Project will positively impact the local Economy and Environment almost immediately. The immediate impact will provide good high paying jobs for workers in our local communities. This means hundreds of jobs in the construction phase alone and permanent jobs once the project is complete. These jobs will boost the surrounding communities with money being spent locally and tax revenue generated.	Thank you for your comment regarding the potential direct and indirect job and income effects associated with the Project. Such effects, along with a discussion of the likely reliance on non-local workers for many of the construction jobs, are discussed in Section 3-17.
IBEW - Ninth District	137-210	We are pleased that after nearly five years of environmental analysis, the Bureau of Land Management and Western Area Power Administration have released the Draft EIS for the TWE Project on July 3, 2013. With so much detailed and thorough environmental analysis completed and in hand, we now ask BLM and Western to finalize the analysis and issue the right-of-way grants within the year.	Thank you for your comment.
Jackson, George	434-652	My address is 924 West 2700 North in Nephi, and I have property to the east and to the north where the power line may go through. My concern is the way they pay because they can condemn if they want to. Once they condemn and pay you what they figure is fair market value, I feel like that is not anywhere near a fair thing for landowners because we do not want to sell now. In the future this land could develop, probably will develop if there isn't a power line across it. So if they go ahead and put a power line across our property, how are we to go back and get the value of the land, you know, if it were to – if it could have developed? We have several power lines on our property now that they paid us for, but it ruins our land. It makes it so that there is no way that it can develop, and so you're getting just a very small fraction of what it really is worth, and that's not fair for property owners to compensate some rich company. I don't understand why we have to do that, you know, compensate somebody's company.	As disclosed in Section 1.6 of the Draft EIS, Western has committed to working with citizens and landowners to address any concerns regarding acquisition of any private lands required for Project implementation, should it decide to participate, and views effective public involvement and engagement as a much more productive route than exercising eminent domain authority.
Jensen, Morgan	125-98	it seems strange to me that in the description of 3.17.4.1 Region I (Section 3.17- Social and Economic Resources 3.17-7) Baggs - a community that will be directly impacted by two of the potential routes (one of which is the Agency preferred) is not even mentioned in the description.	The text acknowledging the proximity of Baggs to the corridor was included in Sections 3.17.4.1 and 3.17.5.2.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Jensen, Morgan	125-99	I was pleasantly surprised to see in Table 3.17-9 the question: "Would there be disproportionately high human health and environmental effects of the Project on minority populations and low-income populations." However, I was disappointed by the lack of attempt on the part of the DEIS authors to actually delve into the socioeconomic levels of different communities. While I understand that there are a number of communities along the corridors, it seems unfair and imprudent to place a transmission line in close proximity to the small, socioeconomically disadvantage Baggs community.	Thank you for expressing your concern regarding the possible location of a transmission line near the community of Baggs. The extent to which Baggs can be characterized or perceived as socioeconomically disadvantaged stems from multiple factors, including its rural location, distance from major transportation networks, and reliance on agriculture, outdoor recreation and tourism, and some nearby energy development for its economic foundation. The latter has contributed to increased industrial land use and activity in the Baggs area. The alternative alignment proposed near Baggs would not affect its location and distance from transportation and would have little effect on agriculture, outdoor recreation opportunities or prospective energy development.
Kaplan Kirsch Rockwell	470-209	request a 90-day extension of the public comment period for the Draft Environmental Impact Statement (DEIS) on the Trans West Express (TWE) Transmission Project and accompanying land use plan amendments. The extension is needed because of an environmental study underway regarding protection of important wildlife habitat, including priority sage-grouse habitat, on the Cross Mountain Ranch. Alternatives being considered in the DEIS would traverse the Cross Mountain Ranch and its important wildlife habitat, including priority sage-grouse habitat.	The BLM determined that a 90-day comment period was sufficient for comment on the Draft EIS and declined to extend the comment period further. Please note that a 90-day comment period is double the required comment period required for EISs for site-specific projects and meets the requirements for comment periods for EISs analyzing land use plan amendments. These requirements are detailed in the Council of Environmental Quality Regulations for the Implementation of the National Environmental Policy Act (CEQ regulations), the BLM NEPA Handbook (H-1790-1), and the BLM Land Use Planning Handbook (H-1601-1).
Kern River Gas Transmission Company	564-1245	Kern River has reviewed the route alternatives presented in the Draft Environmental Impact Statement (DEIS) for the TransWest Express Transmission Project (TransWest). Regardless of which route is selected in the final Environmental Impact Statement (EIS), the new powerline will cross Kern River's existing pipelines near Nephi, Utah. In addition, depending on the route selected, TransWest may parallel Kern River's existing system for up to 150 miles between Iron County, Utah, and Clark County, Nevada. Given that the final transmission line right of way may shift within the selected transmission line corridor, the TransWest project may cross Kern River's existing pipeline system numerous times within the segments that appear from current maps to parallel the Kern River system. In these locations, the Kern River system consists of two 36-inch-diameter pipelines. While the pipelines are generally 25 feet apart within a 75-foot-wide right of way, in some locations they may be substantially farther apart (resulting in separate crossings and impacts where the powerline route crosses each pipeline). To minimize encroachment conflicts and possible effects of high-voltage power transmission lines on its existing pipelines, Kern River would request that TransWest design all crossings of Kern River's pipelines at angles as close to 90 degrees as possible and that the TransWest and Kern River facilities be separated by 1,500 feet in segments where they parallel.	The lead agencies require that TransWest coordinate with all holders of valid existing rights during final siting of the transmission line. As disclosed in Section 3.18, the magnetic field of a DC transmission line, unlike an AC transmission line, does not affect paralleling pipelines.
Kern River Gas Transmission Company	564-1246	Electric transmission lines (AC or DC) that cross or run parallel to existing pipelines cause electrical interference that may cause corrosion to the pipelines. Kern River therefore requires proponents of new encroaching transmission lines to pay for studies to assess the effect of those lines on Kern River's system. The proponent of the new transmission line should also pay for any mitigation Kern River determines is necessary to protect Kern River's existing system from the effects of the new transmission line.	As discussed in Section 3.18.7.2 of the Draft EIS (in the EMF, Corona Noise, and Stray Voltage subsection), the magnetic field of a DC transmission line, unlike an AC transmission line, does not affect paralleling objects such as a pipeline; however, in order to minimize the potential for interference along the portions of the proposed Project that do consist of AC transmission line, measures have been introduced to reduce effects. These include reducing the impedance of the transmission structure grounds, grounding the pipeline in conjunction with de-couplers, burying gradient control wires along the pipeline, and using dead fronts at test stations. In locations where the final alignment of an AC section of transmission line is in close proximity to a pipeline, computer modeling of AC interference effects would be completed and any required mitigation would be designed and installed prior to energizing the transmission line. Further information is detailed in Appendix D.
Kern River Gas Transmission Company	564-1247	Kern River respectfully requests that the Bureau of Land Management (BLM) direct TransWest to consult with Kern River during TransWest's final route selection and to respect Kern River's encroachment standards in locations where the two projects intersect. For a project such as TransWest (with numerous crossings of and/or conflicts with the Kern River system), Kern River would enter into a Specific Encroachment Agreement (instead of an Encroachment Permit) with TransWest prior to TransWest commencing construction. That agreement and Kern River's encroachment standards are described in Kern River's Developer's Handbook, a copy of which is submitted with this letter.	The lead agencies require that TransWest coordinate with landowners or holders of valid existing rights crossed by the Project. This comment has been forwarded on to TransWest to assist them in initiating that coordination.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Kern River Gas Transmission Company	564-1248	<p>Kern River notes that much of the proposed route is located in rural areas in which existing dirt roads would be used or new dirt roads constructed to support the TransWest project. Given the relative location of the major interstate highway in the area, Kern River's pipelines and TransWest's proposed route, dirt access roads for the TransWest project may cross Kern River's pipelines in numerous locations. These roads may not have been constructed to a standard that would support the heavy industrial traffic inherent in the construction, operation or maintenance of a project like TransWest.</p> <p>Kern River respectfully requests the BLM direct TransWest to consult with Kern River as TransWest identifies any locations in which access roads necessary for construction, operation and maintenance of the TransWest project would cross Kern River's existing pipeline system. Kern River likewise requests the BLM direct TransWest to respect Kern River's encroachment standards for crossing the Kern River system with heavy equipment during construction, operation and maintenance of the TransWest project to ensure that any such crossings are conducted safely. The Specific Encroachment Agreement would address the vehicle crossings of Kern River's system necessary for TransWest to construct, operate and maintain its project.</p>	Section 3.16.2.1 of the Final EIS has been revised to disclose the possibility that proposed road uses may cross buried pipelines and may require additional construction to upgrade existing roadways that are not designed for heavy loads. Additionally, TransWest has been notified by the lead agencies' of the need to coordinate with Kern River regarding any Project work that would cross Kern River rights-of-way or facilities.
Kinder Morgan Inc.	184-542	<p>The new HVDC line may have an adverse impact on Kinder Morgans gas pipelines with respect to personnel safety during pipeline maintenance, and stray current corrosion of pipeline. Hence, initially, an engineering study needs to be conducted to determine the extent of the possible impact. Based on the results of the study, mitigation measures may need to be designed and installed. Kinder Morgan also requires the power line owner to pay for the initial study, and any required mitigation measures.</p>	As discussed in Section 3.18.7.2 of the Draft EIS (in the EMF, Corona Noise, and Stray Voltage subsection), the magnetic field of a DC transmission line, unlike an AC transmission line, does not affect paralleling objects such as a pipeline; however, in order to minimize the potential for interference along the portions of the proposed Project that do consist of AC transmission line, measures have been introduced to reduce effects. These include reducing the impedance of the transmission structure grounds, grounding the pipeline in conjunction with de-couplers, burying gradient control wires along the pipeline, and using dead fronts at test stations. In locations where the final alignment of an AC section of transmission line is in close proximity to a pipeline, computer modeling of AC interference effects would be completed and any required mitigation would be designed and installed prior to energizing the transmission line. Further information is detailed in Appendix D.
Kudera, Ryan	129-254	<p>Thank you for the number of public comment opportunities and venues you have provided. It is clear that you are very concerned with what the public thinks and you are doing your due diligence as outlined by FLPMA and NEPA.</p>	Thank you for your comment.
Lake Las Vegas Master Association	647-931	<p>The proposed transmission line runs extremely close to the western boundaries of Lake Las Vegas. This western boundary is lined by hundreds of existing homes. The Lake Las Vegas community has been dramatically affected by the downturn in the economy over the last several years and is just now beginning to see a small recovery. The proposal under Alternative IV-A could reduce the already afflicted property values that our homeowners have experienced and potentially slow the recovery of our area.</p>	Section 3.17.5.2. addresses the findings of research regarding the effect of transmission lines on property values. With regard to this specific location, the potential for adverse effects on future development potential is tempered by the fact that three transmission lines exist in the area and that the primary access road into Lake Las Vegas crosses under these existing lines.
Lancaster, Debra L.	240-271	<p>Please begin this process by removing the Rio Blanco/Garfield County route that is obviously less advantageous to the route suggested by TWE. Listen to the Moffat County Commissioners and let them use their expertise to decide what is best for our region. Your hard work deserves to be rewarded with the admiration of the public. Let's get going!!</p>	<p>In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Alternatives II-B and II-C have been retained for further analyses and consideration to address resource concerns associated with other alternatives. For details on the relative impacts of these alternatives in comparison with other alternatives retained for detailed analysis, see Chapter 3 of the Final EIS.</p>
Lincoln County Nevada Comm/N-4 Grazing Bd	448-511	<p>Lincoln County supports No Net Loss of Grazing Animal Unit Months. This is how one animal unit month is how much one cow and calf will eat in one month. To this end, some of my work involves public lands issues such as this project which crosses 23 active grazing allotments involving 20 individual ranchers. I am going to submit into the record the Project Corridor and Alternative Routes Map that was created on the 14th of August 2013, by Resource Concepts of Carson City, Nevada, that portrays grazing allotment boundaries, the three project corridors that are being studied, the proposed Yucca Mountain Rail Route, the major highways and some of the minor roads in Lincoln County as are impacted or concern this project. The shortest route, or red on this map, impacts one rancher for 11 miles that would disturb 494 acres. To get this figure, we used a width of 250 feet by 1 mile long. The agency preferred route, or the green route on this map, impacts 13 ranchers or 67 miles of disturbed area, or 2,043 acres to be rehabilitated. The longer route shown on this map in blue impacts 9 ranchers for 97 miles of disturbance, containing 2,967 acres that will need mitigations. So, how do we achieve No Net Loss of AUMs? By a constant seat at the table during planning, construction and operation of this proposed line. There will be increased management costs for Lincoln County Planning Department and the Lincoln County Road Department and day-to-day increased costs for the ranchers crossed by this line.</p>	Livestock grazing mitigation Range-1 requires consultation with the BLM Field Office, and the grazing permittees to determine site-specific impacts from construction activities.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Lincoln County Nevada Comm/N-4 Grazing Bd	448-512	The Final EIS should include discussion for protections and upgrades of current range improvements such as thinning of pinion juniper trees along this line coupled with revegetation work using native and non-native seed mixtures. This reduces the fire intensity and repeat potentials and increases the beneficial forage for all animals. During the NV Energy Project in the valleys next to us to our west, Dry Lake and Delamar, we learned a lot. We found that more cattle guards are essential to keeping the cows where they belong, and the land and resources do receive much increased public casual use accesses	Site-specific mitigation will be determined during the POD, and ROD process prior to construction as detailed in mitigation measure Range-1. Detailed information on range improvements is not available for much of the route, nor are site-specific disturbance locations available. To mitigate potential impacts to range improvements, range mitigation Range -1 to Range -5 provides that prior to construction and placement of structures, facilities, and access roads, the applicant will coordinate with the local BLM office and permittees to determine conflicts with grazing resources, and provide detailed mapping of existing range improvements. Pinion-juniper removal will be determined in consultation with the landowner, land management agency, and the applicant.
Lincoln County Nevada Comm/N-4 Grazing Bd	448-513	We also found the improved construction roads makes it easier for non-related mineral drilling companies to steal water from a livestock reservoir that was filled by a 30-mile pipeline using certificated water privately owned. Mitigations that should be included in the Final EIS are using existing roads and/or allotment boundaries and installing additional fencing. These project features must be discussed with the individual ranchers. First, you need to know where the fences and range improvements already exist, then you should consult with the ranchers to see what will help or hurt his operations.	Discussion on potential increased access to grazing allotments has been added to the livestock grazing impact discussion. Site-specific mitigation will be determined by the BLM Field Office and the Applicant, including the need for additional fencing. Range mitigation Range -1 to Range -5 provides that prior to construction and placement of structures, facilities, and access roads, the applicant will coordinate with the local BLM office and permittees to determine conflicts with grazing resources, and provide detailed mapping of existing range improvements.
Lincoln County Nevada Comm/N-4 Grazing Bd	448-514	Both of the longer routes, the blue route and the green route, have serious wildlife impacts. I am going to introduce two maps at this point. The smaller map is on an 8.5 by 11 sheet. And it is contained in the Draft EIS. Figure 3.7-5, Region 3, entitled Important Big Game Habitat. And the second map I am going to introduce at this point is a Wildlife Map for the TransWest Express Transmission Project, dated August 14th, 2013, created by Resource Concepts, Incorporated of Carson City, showing elk habitat, desert big horn sheep habitat, mule deer habitat, pronghorn antelope habitat, and some county roads and paved highways. This is contained in Region 3 on page 3.7-5. One of the biggest apparent lack of information in this document is contained on these two maps. The smaller map created by TransWest Express EIS Draft indicates almost no elk habitat in this area, next to the agency preferred route shown in green on my larger map when, in fact, that is a very significant elk habitat.	Comment noted. Big game range data received from NDOW has been updated and has been incorporated into the TWE FEIS figures and analysis. The purpose of Figure 3.7-5 is to show only "crucial winter range" for big game. With the exception of desert bighorn sheep, this map does not the show the overall occupied range of the more common species.
Lincoln County Nevada Comm/N-4 Grazing Bd	448-515	This draft talks about the 1996 Lincoln County Public Land Plan. The final should include the information from the more current 2010 Lincoln County Public Land Policy Plan.	Reference to the Lincoln County Public Lands Policy Plan in Table 3.14-20 was updated to reference the 2010 plan, consistent with Table 3.14-2.
Lincoln County Nevada Comm/N-4 Grazing Bd	449-518	We compliment this Draft EIS for the design features and mitigations detailed in Appendix C that calls for avoiding, minimizing and mitigating the effects of this project on agriculture and grazing operations. This section should be improved with county specific and allotment specific analyses. This segment of this project goes through four Utah Counties and multiple grazing allotments and more private land than in the Lincoln County portion of this Segment 3.	Site-specific impacts to specific allotments cannot be determined at this time. Based on estimated surface disturbance, and an average AUM, conservative estimates of impacts to range allotments in each region are provided for analysis. Any site-specific mitigation will be determined during the POD, and ROD process in conjunction with the permittees, and land management agency, prior to construction as detailed in mitigation measure Range-1.
Lincoln County Nevada Comm/N-4 Grazing Bd	449-519	Every county planning department and public works department and road maintenance department will incur increased management costs long-term associated with this project's operation. These impacts should be included and discussed in the Final EIS.	Text was added in Section 3.17.5.2 to disclose the potential increases on local government's administrative, law enforcement, judicial, and roads and public works functions with the construction and operation of the power line. The scale of such effects associated with a transmission line would generally be limited due to the relatively short duration of construction crew presence in communities along the corridor and lack of permanent work force and project related traffic in the long-term.
Lincoln County Nevada Comm/N-4 Grazing Bd	449-520	The Final EIS should contain information and references from the most current county public land policy plans of Iron, Beaver, Millard and Washington Counties. I mention this because this Draft uses the information from the 1996 plan for Lincoln County.	Reference to the Lincoln County Public Lands Policy Plan was updated to reference and be consistent with the 2010 plan.
Lincoln County Nevada Comm/N-4 Grazing Bd	449-521	The mapping in the Final should do a more complete job of portraying private property ownership.	Private property ownership is clearly shown in Chapter 2 in Figures 2-21 through 2-24 and includes all potential alignments. Unfortunately, for a project of this scale, detailed maps showing specific property owners are not feasible. However, all pertinent GIS information has been posted on the project website and affected property owners will be contacted directly by the proponent as the Project progresses.
Lincoln County Nevada Comm/N-4 Grazing Bd	449-522	This Draft EIS is deficient in addressing county specific impacts, both economic and fiscal impacts. This Segment 3 goes from Delta, Utah to Las Vegas, Nevada, and is 300 of the 725 miles TWE crosses. The grazing losses detailed in the Draft are grossly inadequate, because every acre over that 300-mile stretch is being analyzed as being the same. We all know there are marked differences between Delta, Utah and Las Vegas, Nevada in vegetation, soil, terrain, seasons, plant resiliency, annual moisture, existing public accesses and expected future casual use access. To be correct, the Final must include individual grazing allotment impacts. Again, ask the ranchers. They know it best.	Site-specific impacts to specific allotments cannot be determined at this time. Based on estimated surface disturbance, and an average AUM, conservative estimates of impacts to range allotments in each region are provided for analysis. Any site-specific mitigation will be determined during the POD, and ROD process in conjunction with the permittees, and land management agency, prior to construction as detailed in mitigation measure Range-1.

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Commenter Name	Comment ID	Extracted Comment	Response
Lincoln County Nevada Comm/N-4 Grazing Bd	449-523	Some of these ranchers are impacted already by existing projects and projects that are under construction today and reasonably foreseeable projects, such as the Southern Nevada Water Authority Pipeline and associated power line, the proposed Yucca Mountain Rail Line, the controversial pipeline from Lake Powell to Southern Utah for water, the Zephyr Energy Project and the solar energy zones proposed here in Iron and Beaver Counties. The Final EIS should be substantially upgraded with an analysis of all these projects in Section 5, cumulative impacts where past, current and future actions are mentioned on page 5-11. See tables 5-9 and 5-26. There are no cumulative impacts analysis on livestock grazing by any of these past, present and future projects. There exists no analysis on past and anticipated wildfires shown on pages 5-7 and 5-8. Today we consider this Draft to be inaccurate and incomplete.	The Southern Nevada Water Authority Pipeline project and the solar energy projects in Iron and Beaver counties were included as RFFAs in Chapter 5 of the Draft EIS. The BLM has determined that the Zephyr project does not currently meet the requirements for inclusion as a reasonably foreseeable project as it does not have a ROW application on file with the BLM. The Final EIS was revised to include cumulative impacts of the Yucca Mountain Rail Line. It was also revised to include an analysis of cumulative impacts to grazing.
Lincoln County Nevada Comm/N-4 Grazing Bd	450-525	We consider Section 5 Cumulative Impacts discussion to be incomplete. There have been no cumulative impact analyses on livestock grazing on any of these past, present or future projects. Three of these ranchers suffered a 600,000-acre wildfire eight years ago. When you meet with the rancher to discuss, he can tell you that lightning started the fire that was made much worse by the agency lit backfires that exploded during 30 mile-an-hour winds. With the ongoing drought, the vegetation has not returned. This should be analyzed in your Section 5-7 and 5-8. In the recent Standards Determination Document for these allotments, it verifies that livestock do not contribute to the decline in these range conditions. Specifically, the past analyses show that grazing in just the Caliente BLM Office has been reduced by 8 percent from 1980 to 1999. More recently, the 2008 Ely Resource Management Plan states that grazing was reduced by 24 percent from the year 2000 to 2006. This continuing decline in grazing was not disclosed in the TransWest Express Draft Environmental Impact Statement analysis, nor were the estimated effects from this project or other reasonably foreseeable projects that would contribute to this ongoing downward trend. Remember the three routes being studied over a range of 16 miles to 97 miles just in the Lincoln County part of Segment 3 of this project. On this basis alone, this Draft EIS is lacking and deficient. Work with these ranchers, provide a process for meaningful input, commit to doing detailed inventory grazing allotment crossed by this project.	The Final EIS was revised to include an analysis of the cumulative impacts of the Project and past, present, and reasonably foreseeable future actions on grazing.
Lincoln County Nevada Commissioner	139-119	I hope access is guaranteed for our ranches who use the public land for grazing. I request re-seeding with plants that benefit cattle. A reduction of the Juniper-pinon overstory would be beneficial.	Livestock grazing mitigation Range-1 requires the Applicant to consult with the BLM Field Office and the grazing permittees to determine site-specific impacts from construction activities. Site-specific corrective actions would be determined as part of the consultation. The mitigation has been updated to include operation impacts in addition to construction activities. Access, restoration, and vegetation management actions will be included as part of the consultation.
Lincoln County Nevada Commissioners	691-1868	The document states the Agency Preferred route was developed to decrease resource impacts in southwestern Utah. Please provide more detailed analysis showing how the Agency Preferred route would reduce the overall resource impacts in this region when a much larger percentage of the Applicant Proposed route lies within or adjacent to, an existing utility corridor. For example, the Agency Preferred Route, if chosen, will be subject to a land use plan amendment for the Ely District Resource Management Plan. In addition, much of the Agency Preferred route within the County is relatively remote and will require additional planning and development, logistical consideration as well as local coordination throughout the process. Increased overall construction and maintenance costs will also be realized.	In their selection of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and the applicant objectives while balancing federal land managers' multiple use mandate. Additional rationale regarding how the Agency Preferred Alternative was picked was provided in Chapter 2 of the Final EIS.
Lincoln County Nevada Commissioners	691-1870	Chapter 3, Section 3.14.6: Impacts to land use such as grazing should be mitigated. Mitigation such as pinion juniper removal and reseeded should be prioritized for on-site as well as offsite to guarantee no net loss of AUMs. Pinion-juniper removal and proper vegetation treatments within and adjacent to corridors will also reduce wildfire hazards as well as improving wildlife habitat.	Range-1 to Range-7 in addition to the applicant committed design measures are proposed to mitigate impacts from the Project to livestock grazing.
Lincoln County Nevada Commissioners	691-1871	Table 3.14-20 describes land use plans and policies relevant to Region III. Please add the Lincoln County Public Lands Policy Plan 2010 as a correction to the 1996 plan cited.	Reference to the Lincoln County Public Lands Policy Plan in Table 3.14-20 was updated to reference the 2010 plan, consistent with Table 3.14-2.
Lincoln County Nevada Commissioners	691-1872	The Lincoln County Planning and Development Code, (Lincoln County Code, Title 13, amended 2006) specifies federally managed lands within Lincoln County have a zoning designation of "Agricultural."	Table 3.14-20 was updated to reference the Lincoln County Planning and Development Code "agricultural" zoning designation for federal lands.
Lincoln County Nevada Commissioners	691-1873	The Project would require a Special Use Permit approved by the Lincoln County Planning Commission. The process would include consultation with the Board of Lincoln County Commissioners.	The need for a conditional special use permit from Lincoln County is noted in Appendix A of the Draft EIS. The Land Use section of the Draft EIS (see Table 3.14-20) notes that the chosen route shall be submitted to the board of county commissioners for review and recommendation.
Lincoln County Nevada Commissioners	691-1875	The County fully recognizes the impacts to existing road networks during construction. Issues such as increased traffic and the necessary maintenance component that accompanies said project and all associated cumulative impacts should be analyzed. These issues will also be addressed within the Special Use Permit when appropriate.	Impacts to existing road networks are identified, including increased traffic and maintenance. The Road Analysis Plans to be prepared for the Project will address existing, project-related and non-project-related trip generation, safety and maintenance considerations and will be subject to applicable local, state and federal approval processes.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Lincoln County Nevada Commissioners	691-1876	As stated earlier, the County supports the Agency Preferred route. In terms of tax revenue there is a significant benefit to the County in supporting the Agency Preferred route that contains approximately 130 linear miles within the County. These potential revenues and taxes should be analyzed in the Final EIS and more details provided on the timelines for these projected incoming revenue sources.	Additional discussion of the estimated tax revenues, provided by TransWest, was included in Section 3.17.5.
Lincoln County Nevada Commissioners	691-1877	Chapter 5, Section 5.2.3 This section should include analysis on the proposed Yucca Mountain Rail Alignment. Alternatives III-A and III-C impact the line. Please include the rail line within Table 5-8.	The Yucca Mountain Rail Alignment was included as a reasonably foreseeable future action list for Region III and Chapter 5 of the FEIS analysis was updated appropriately.
Lincoln County Nevada Commissioners	691-1878	Appendix A-Table A-1 Please include Special Use Permit requirements for Lincoln County.	Special Use Permit requirements for Lincoln County, Nevada were added to Table A-1 in the Final EIS.
Lincoln County Nevada Commissioners	691-1879	As a cooperating agency, the County looks forward to contributing to this collaborative process and having a "seat at the table" throughout. Therefore, we respectfully ask that you include in your BLM performance stipulations enumerated in your expected Record of Decision to Trans West Express, following the Final EIS: the requirement that Lincoln County Commission, Lincoln County Planning Department, Lincoln County Road Department, and the N-4 State Grazing Board be consulted with by the Trans West Express/W APA group and their chosen construction contractor to recognize, plan for and mitigate project associated impacts. These local representatives should be included in pre-construction inventories and planning meetings to provide location specific information and work together with BLM and Trans West. This collaborative process will promote a positive working relationship between all affected entities.	The lead agencies require that TransWest coordinate with landowners and holders of valid existing rights crossed by the Project. The lead agencies are responsible for the planning and enforcement of required pre-construction surveys, mitigations, stipulations, design features, and applicant-committed measures and will direct that TransWest coordinate with local municipalities as appropriate when impacting resources that are either under that municipalities jurisdiction or for which that municipality has special expertise.
Lincoln County Water District	649-936	Alternative III-B (Agency Preferred) follows the same LCCRDA corridor through Lincoln County as the District's proposed water pipeline from the Clover Valley to the Toquop Township just north of Mesquite, Nevada.	Chapter 5 of the Final EIS was revised to analyze the cumulative impacts of the TWE Project and the noted existing projects, including the Lincoln County Land Act Groundwater Development and Right of Way Project.
Lincoln County Water District	649-938	For rural counties such as Lincoln, the Project will reflect a significant amount of potential revenue through sales and use tax during construction as well as the centrally assessed taxes on the transmission line and other infrastructure. As stated earlier, the County supports the Agency Preferred route. In terms of tax revenue there is a significant benefit to the County in supporting the Agency Preferred route that contains approximately 130 linear miles within the County. These potential revenues and taxes should be analyzed in the Final EIS and more details provided on the timelines for these projected incoming revenue sources.	Additional discussion of the estimated tax revenues, provided by TransWest, was included in Section 3.17.5.
Lincoln County Water District	649-939	Linear Facilities as discussed on page 5-13 and as shown in Figure 5-5 discuss other linear utilities associated with Project corridors, but only discuss Alternative's III-A and III-C. Figure 5-5 indicates that Alternative III-B has no other linear utilities. However, Figure 4-13 shows an existing aboveground corridor in Alternative III-B. The District has an existing Right of Way in the Alternative III-B corridor for the Lincoln County Land Act Groundwater Development and Right of Way Project, which should be considered a linear facility and included in the analysis and figures in this section. All references to portions of Alternative III-B in this comment refer to Segment 510 as set out in Figure 2-23.	Chapter 5 of the Final EIS was revised to analyze the cumulative impacts of the TWE Project and the noted existing projects, including the Lincoln County Land Act Groundwater Development and Right of Way Project.
Lincoln County Water District	649-940	Table 5-8 sets out the Reasonably Foreseeable Future Actions in Region III, including other water pipelines proposed by Southern Nevada Water Authority with a construction timeframe from 2013-2050. As mentioned above. The Lincoln County Land Act Groundwater Development and Right of Way Project is also within the Alternative III-B corridor (Section 510 as set out in Figure 2023) for development of groundwater resources in the Clover and Tule Basins to be delivered to the Toquop Township North of Mesquite, NV. The Lincoln County Land Act Groundwater Development and Right of Way Project should be included for analysis in the cumulative impacts.	Chapter 5 of the Final EIS was revised to analyze the cumulative impacts of the TWE Project and the noted existing projects, including the Lincoln County Land Act Groundwater Development and Right of Way Project.
Lincoln County Water District	649-941	While the District is not a cooperating agency, the District shares the same board as the Lincoln County Commissioners. and Lincoln County is a cooperating agency in this collaborative process. Therefore, we respectfully ask that you include in your BLM performance stipulations enumerated in your expected Record of Decision to Trans West Express. Following the Final EIS: the requirement that Lincoln County Water District be consulted with by the Trans West Express/WAPA group and their chosen construction contractor to recognize, plan for and mitigate project associated impacts.	RANGE-1 has been modified to state that any additional parties to be included in the coordination between the land management agency, the grazing permittee, and the applicant will be included at the discretion of the local BLM office, and the affected grazing permittee.
Lohse, Brooke	242-273	The benefits for this project are well known, and the amount of time the BLM, cooperating agencies and the developer have spent on due diligence is truly impressive. I'm happy to see this project so close to the finish line.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Lohse, Brooke	242-274	I know you have specific issues to make decisions on, like the micrositing section of your DEIS, near the Tuttle Ranch in my area. I fully support your sighting criteria of co-locating using existing transmission corridors, and therefore believe that Option 1 on the Tuttle Ranch Conservation Easement is the most logical use of space. I completely understand why you feel you have to put forward other alternatives that avoid the conservation easement, but when two existing transmission lines already pass through the easement, the logical choice is clear. Instead of creating an additional eyesore nearby, let's co-locate.	The lead agencies will consider your input as they evaluate alternatives in the Final EIS. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Lubanko, Matt	169-231	In fact, the Draft EIS clearly states that the TransWest project will improve air quality by reducing CO2 emissions by an astonishing and materially large amount of 12 MILLION TONS per year, making our environment cleaner; that fact should be moved up to the introduction of the Final EIS and not buried as a small note at the end of Section 3.1.	The EIS discusses the potential for the Project to reduce GHG emissions. This potential depends on the source of the energy transmitted by the transmission line. The source of the transmitted energy is outside of the scope of this analysis and therefore, the level and amount of discussion are adequate.
Ludwig, Evan	437-656	There's no mention of who will rip out the cement anchorages if the line is abandoned in 50 to 100 years and other residual trash left in years to come.	Section 2.4.2.1 of the Final EIS was revised to indicate that TransWest would be responsible for decommissioning the transmission line at the end of its useful life.
Ludwig, Evan	437-657	Tell California if they want renewable power to mount these generating windmills in their hills and out in the ocean like Germany does. They can clutter up their own backyard, they might not pass such idiotic laws that forbid fossil fuel usage. The same holds true of Phoenix and Las Vegas areas. If you need it and want it, don't ask your neighbor to be your garbage dump for all your high lines.	Thank you for your comment. The proposed action is not a BLM- or Western-generated action. TransWest submitted a request to the BLM for a ROW across public lands in order to build a transmission line. As stated in Chapter 1 of the Draft EIS, the BLM's purpose and need is to consider the ROW application in accordance with 43 CFR Part 2800. The EIS process discloses the environmental effects of granting that ROW, including an analysis of alternatives to the proposed route across federal lands. However, it is beyond the scope of the lead agencies' decision to be made, and therefore, this EIS analysis, to identify potential energy sources or end markets for TransWest (See Sections 1.1.1.1 and 1.1.2.1 of the Draft EIS).
MacKinnon, Wallace	588-918	Your agencies have done a thorough job assessing the TransWest project's environmental implications.	Thank you for your comment.
Magnum Development, LLC	181-689	As a potentially affected landowner with a large-scale industrial development in Millard County, Magnum is extremely concerned that the DEIS Agency Preferred Route and proposed DLUP A will adversely impact Magnum's Western Energy Hub development site (WEH site). Magnum has been developing the WEH site for the past six years. The WEH site has numerous businesses under development including the Magnum Gas Storage Project and the Magnum NGLs Storage Project. Both of these projects are fully permitted at the federal, state and local levels to include Bureau of Land Management Right of Way Grants UTU-87295 and 87295-01. The WEH site is located directly east and south of the Intermountain Power Plant in Millard County, Utah. The site is located on a combination of privately held fee and mineral lands and lands leased to Magnum by the School and Institutional Trust Lands Administration (SITLA). The successful commercialization of each Magnum business will provide significant economic benefits to the State of Utah, SITLA and Millard County through lease and royalty payments, tax revenue, and job growth. Phase 1 construction of Magnum NGLs Storage is in the final stages of completion. Company operations will begin in early 2014.	Information regarding the Magnum Gas storage project was included as a Reasonably Foreseeable Future Action in Chapter 5 (page 5-15). This information was added to Section 3.14 and augmented as needed to identify both existing and proposed portions of the project.
Magnum Development, LLC	181-690	The WEH is centered on the development of a unique geologic structure, a "Gulf-Style" salt dome. This is an extremely rare and important asset as it is the only known salt dome of this kind in the Western United States. The significance of the resource is that large scale underground storage caverns (500,000 to 10,000,000 mmbbls) can be constructed for the storage of natural gas liquids, natural gas, petroleum, and other refined products. This type of salt cavern can also be used to develop Compressed Air Energy Storage (CAES). CAES is a highly sought after utility scale energy storage technology which supports the development of renewable resources. Magnum has sizable holdings in proximity to the salt, however, the critical surface area over the salt is less than 1000 acres. The DEIS Agency Preferred Route crosses directly over this valuable resource. Approval of the DEIS Agency Preferred Route will severely limit Magnum's ability to develop the most critical area within our holdings.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Due to the thousands of miles of alternatives, it is not feasible to analyze all of the claims and leases for validity or potential commerciality, or mitigate for all possible situations that may arise with regard to resource conflicts. It is also not possible for the BLM to dictate the terms and conditions in agreements between the applicant and mineral owners or lessees. The BLM will issue a ROW grant that is consistent with applicable regulations but recognizes that the applicant must acquire all access permissions in mixed ownership situations and it is expected that mineral rights conflicts would be resolved prior to construction. The proposed transmission line, when constructed, will occupy a 250-foot wide ROW. The 250-foot wide ROW should facilitate resolution of many perceived conflicts. The terms and conditions of the ROW grant, as specified in 43 CFR Subpart 2801, includes "the right [of the BLM] to require common use of the right-of-way, and the right to authorize use of the right-of-way for compatible uses (including the subsurface and air space)." The BLM recognizes that subsurface activities (in this case, mineral extraction) may not in all cases be compatible with the intended ROW use but as stated above, potential conflicts must be resolved prior to construction. It also should be noted that although many unpatented mining claims have dubious validity, it is the responsibility of the ROW grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners.
Magnum Development, LLC	181-691	Additionally, the route overlaps or encroaches on multiple existing facilities that include:- a rail spur;- truck and rail loading facility;- 156 acre brine pond;- overhead power distribution system;- underground water and brine distribution systems;- buried natural gas liquids product transfer lines; and- two natural gas liquids storage caverns with an aggregate space of 3 mmbbls.	Section 3.14 of the Final EIS was revised to include additional detail regarding the potential impacts of the Project on the Magnum Gas Storage facility. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.

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Magnum Development, LLC	181-692	<p>The DEIS Agency Preferred Route also encumbers essential surface space dedicated to future businesses. These businesses will include additional storage caverns and support facilities, many of which are in advanced development stages and permitted by the Federal Energy Regulatory Commission, Bureau of Land Management, Millard County Board of County Commissioners and various State of Utah agencies. The directly impacted permitted facilities:</p> <ul style="list-style-type: none"> - four natural gas storage caverns with an aggregate space of 40 mmbbls/54 bcf; - 36-inch natural gas pipeline; - two 156 acre brine evaporation ponds; - 46 kV distribution line; - compression station and other support buildings; and - additional underground water and brine distribution systems. <p>The list above is not inclusive of all the future facilities planned for construction at the WEH site</p>	<p>Thank you for your comment. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input such as yours. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative were provided in the Final EIS.</p> <p>The lead agencies have informed TWE of your concerns. If the alternative you refer to is implemented, TWE will be required to coordinate with existing land owners and holders of valid existing rights that the project may impact to ensure that hindrances to the existing and foreseeable land uses would be minimized.</p>
Magnum Development, LLC	181-693	<p>Magnum has reviewed the route alternatives presented in the DEIS and DLUPA. We support the DEIS Applicant Preferred Route that passes to the north and west of our property within the West Wide Energy Corridor. It is our understanding that other significant stakeholders are also in favor of the DEIS Applicant Preferred Route. We sincerely hope that these cumulative comments will be of principal consideration when making the final route selection.</p>	<p>In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.</p>
Millard County Utah County Commission	596-805	<p>The Agency Preferred Alternative for the TransWest Express transmission line project is identified outside of the West-wide Energy Corridor in the northern region of Millard County. Millard County has been, and remains, vigorously opposed to the Agency Preferred Alternative, in the northern region of the County, as identified by Agency Preferred Alternative Segments 350, 370, 380, 420 and 440 (Figure 2-22). Millard County is opposed to Segments 350, 370, 380, 420 and 440 for the following reasons:</p> <ul style="list-style-type: none"> - These segments unnecessarily impact private property. - The private lands impacted are high producing agricultural and farmland areas. Millard County is one of the highest producing agricultural areas in Utah with agriculture being a vital element of the local economy. Millard County has adopted a number of policies that work to protect agricultural production and prime farmlands. The Agency Preferred Alternative has the potential to negatively impact the agricultural production and prime farmlands of Millard County. - These segments compromise the viability of locations for future industrial and economic development opportunities surrounding the Intermountain Power Plant and adjacent to Brush Wellman Road. - These segments directly and negatively impact already approved activities occurring adjacent to the Intermountain Power Plant including the Magnum's Western Energy Hub development. - Potential for impacts to the Sevier River and Fool Creek Reservoir, particularly during line construction activities. - Increased visual impacts to private property owners, including visual impacts to the community and residents of Lynndyl. - Directly in conflict and inconsistent with the Millard County General Plan. - Directly in conflict and inconsistent with the Millard County Zoning Ordinance. 	<p>In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.</p>

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Commenter Name	Comment ID	Extracted Comment	Response
Millard County Utah County Commission	596-806	Consistent with the goals, policies, and objectives of Millard County for appropriately planned energy corridors, Millard County now identifies an alternative alignment for the TransWest Express transmission line project. Millard County generally supports the Applicant Proposed II-A alternative route, with alignment siting revisions. The project must remain within the West-wide Energy Corridor with the following micro-siting adjustments. The micro-siting adjustments identified are directed to the Applicant Proposed II-A alternative route (at points 1, 2, and 3 below) and all are located within the TransWest Express Project Study Area boundaries.1. Segment 320.15, Segment 320.151 and Segment 320.152 should be identified as providing alignment on the west side of Highway 6 and immediately adjacent to the existing railroad right-of-way. (It appears, and using Figure 2-22 information, that Segment 320.15 should continue further west, crossing Highway 6 and the railroad right-of-way before turning generally south-southwest to parallel the railroad.2. Segments 320.15; 320,151; and 320.152 should parallel the immediate western edge of the railroad right-of-way for approximately 5 miles then turn west and southwest to completely avoid any impacts to the private agricultural lands located in Juab County and north of Lynndyl.3. The TransWest Express route could parallel the Magnum Gas line to the west and continue within the West-wide Energy Corridor. Millard County recommends that the TransWest Route be located on the south and eastern boundary of the corridor, as much as practicable, to preserve corridor capacity.4. The other Route Segments located in Millard County, including Segments 450 and 470 (Figure 2-23) appear to be located in the West-wide Energy Corridor. For these Segments the Agency Preferred and the Applicant Proposed routes look identical. Consistent with our prior points Millard County supports the siting of the TransWest Express project within the West-wide Energy Corridor for Segments 450 and 470 (Figure 2-23). The Bureau of Land Management, Fillmore Field Office has identified a need to avoid the amenities offered by the Little Sahara Recreation Area. The micro-siting adjustments proposed by Points 1, 2, and 3 strike a balance between the values of the Little Sahara Recreation Area and the goals and policies of Millard County.	Additional engineering design has been completed in the area north of Lynndyl along Highway 6 in consideration of private agriculture lands, the resource constraints of the sand dunes and high recreation use of the area. The recommendations of this comment were largely implemented in the Final EIS with minor exceptions.
Miller, Jamie	136-115	I would like to congratulate you on your work to publish this behemoth of a document related to this very important project. I also want to thank you for all the public comment opportunities and open houses across the different states. However, with all of these wonderful elements that fully implement the spirit of NEPA, there are some areas where it appears that the needs and local wishes of the people who will be affected by this project have been placed by the wayside	Thank you for your comment. All public comment is considered during development of alternatives and selection of the agency preferred alternative. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Moffat County Colorado Nat Resources Dept	163-422	In addition to the below comments which pertain to the 2013 Version of the Draft Environmental Impact Statement, and due to there not being a record of comments from Moffat County regarding the January 4, 2012 version of the Draft Environmental Impact Statement, we are submitting Appendix A. Appendix A is comments written in March 2012 referencing the January 4, 2012 Draft EIS. We fully realize that between the 2012 version and this 2013 version of the Draft Environmental Impact Statement, some comments may no longer be relevant. Nevertheless it is important we assure a record of commenting on the various versions of the Draft Environmental Impact Statement, even if they are outdated.	Comment noted. The 2012 Preliminary Draft EIS comments have been included for response if relevant and appropriate at this stage of the EIS process.
Moffat County Colorado Nat Resources Dept	163-424	Moffat County has taken a firm stance against condemnation being used as a tool to acquire private land easements.	Comment noted. As described in Section 1.6 of the Draft EIS, Western has committed to working with citizens and landowners to address any concerns regarding acquisition of any private lands required for Project implementation, should it decide to participate in the project.
Moffat County Colorado Nat Resources Dept	163-425	Moffat County has commented through a formal letter (August 9, 2011) as well as repeatedly through cooperating agency meetings that we value pre-planning to assure that Trans West, Gateway South, the Zephyr line, and others all stay within the same 2 mile corridor. As of the July 17, collaborated to promote the same corridor through Moffat County. We strongly believe the same corridor for all lines should be evaluated in this EIS. Discussion such as the "pinch point" discussion in the Conclusion of Section 5.3.14.2 does not demonstrate that BLM is dedicated to finding a route where a 2 Mile Corridor is possible.	Chapter 5 of the Final EIS analyzes the cumulative impacts from the TransWest Express and Energy Gateway South lines being built in the same corridor. The Zephyr project was not included in this analysis as the project applicant for that project has not submitted a final proposal to the BLM. The lead agencies are currently considering the possibility of routing the TransWest Express and Energy Gateway South lines in the same corridor to the maximum extent possible. A range of alternatives that would allow for that are being considered in this Final EIS, as well as in the Energy Gateway South Draft EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
Moffat County Colorado Nat Resources Dept	163-426	The Trans West Express Transmission Project corridor and the Gateway South Project corridor do not line up exactly in various portions of the Seven Mile Ridge route across Moffat County. The Moffat County Commissioners agree with the proposed corridor of 2 miles in width to provide for future transmission lines. Incongruencies between both proposed 2 mile corridors (Trans West and Gateway South) must be rectified in order to minimize surface disturbance and provide one corridor for any currently proposed transmission lines, as well as future transmission lines. Moffat County requests BLM identify the transmission line corridor as a one-time allocation, and guarantee that future line will stay within the 2 mile corridor. BLM must also commit that expansions of the corridor to accommodate other needs is not anticipated in the foreseeable future. Of particular concern is the ability for additional power lines within the proposed corridor to be kept in the corridor, and that there is room within the corridor for these expansions. BLM has not assured this because Trans West and Gateway South have deviated routes from each other.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3 of the Final EIS was revised to include details regarding this approach. TransWest and the Energy Gateway South proponents are collaborating to develop collocated routing for the projects considering 250-foot general minimum offsets. This collaboration will be accomplished within the TransWest EIS analyses corridors. Information related to establishment of new designated utility corridors is contained in Chapter 4 of the EIS.
Moffat County Colorado Nat Resources Dept	163-427	Issues such as the two power line corridors lining up should have been rectified before the TransWest DEIS became available for public comment.	The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to the final layout of transmission lines currently under construction (such as Energy Gateweay West), as well as allowing for changes associated with on-going colocation needs between TWE and the Energy Gateway South project. The need for all transmission line projects (including Energy Gateway South) to efficiently plan in a way that will support future sitings is addressed by the WVEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". An analysis of the ability for multiple future transmission lines to be placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.
Moffat County Colorado Nat Resources Dept	163-428	Disturbance Caps: Although Section 5.3 reviews potential impacts to other power lines built within the corridor established by this EIS, it does not mention the effect on Sage grouse habitat disturbance caps (probable in the Sage Grouse EIS) that the corridor will create. Although Moffat County is aware there has been discussions of not counting the power line corridor against the surface disturbance cap of sage grouse habitat, Moffat County strongly opposes this concept as it pedestals one land use above others by giving power lines a 'free pass' regarding sage grouse. Moffat County requests full discussion and impact analysis occur regarding impacts of the TransWest EIS on sage grouse disturbance caps proposed in the BLM Sage Grouse EIS. It is plausible that BLM may take the position that since disturbance caps are not yet adopted because the Sage Grouse EIS is still in draft form, that BLM cannot analyze impacts. This would be a short-sighted position since it is known that the disturbance cap concept is in BLM's preferred alternative and will very likely be implemented.	The impacts of the Project on the sage grouse habitat density cap established by Wyoming EO 2011-5 is disclosed in Section 5.3.8 of the Draft EIS. Please note that designated corridors for utilities do not count against this cap following the established Wyoming EO 2011-5 guidance,. It has been determined that these corridors would be designated to decrease the proliferation of utility corridors and corresponding impacts on sage grouse habitat. The corresponding section of the FEIS was updated to include an analysis of any changes in the impacts of the Project on these caps. The EIS analysis for this Project makes no assumptions regarding potential disturbance caps the on-going BLM sage grouse planning efforts you reference as this would be speculative and pre-decisional. Additionally, please note that these potential decisions regarding sage grouse habitat density disturbance caps (as well as other sage grouse planning decisions) are outside the scope this EIS process and decision. Consideration and disclosure of those sage grouse planning decisions and are being done through their respective NEPA processes. A discussion of these ongoing LUP and RMP greater sage-grouse amendments that intersect with this Project is provided in Appendix J of the FEIS.
Moffat County Colorado Nat Resources Dept	163-429	Sage Grouse Credit Exchange System I Valuation of Easements: The Credit Exchange system is not addressed in the EIS, yet should be studied and recognized as being a tool for additional compensation for landowners whose credit selling ability would be impacted by the power line corridor, as well as acknowledgment that the Credit Exchange Program offers a mechanism for power line corridors to be established. Although the Credit Exchange is a pilot program at this point, it is very plausible and likely to move from pilot to being implemented at a commercial scale. Table 3.14.7 and other impact analysis sections should consider the impacts to the agriculture and industry sectors that are likely to utilize this program to buy/sell sage grouse habitat credits on the open market. Moffat County requests that section 3.14 page 28 "Agriculture" have a description of how the power lines impact the ability for Sage Grouse Credit Exchanges. Again BLM may consider the credit exchange program pilot premature for EIS consideration, but considering the dramatic impacts on BLM's analysis, Moffat County requests its consideration in the TransWest EIS. Sections 3.17-30 and 3.17-31 fail to identify the socioeconomic effects related to the power lines in the light of the Credit Exchange Program.	Due to the infancy of the Credit Exchange System and the speculative nature of the applicability, availability, and potential impacts to land owners in and near the transmission line, this pilot program is not a part of the analysis in the FEIS. However, a subsection in Section 3.14.6.2 (Impacts Common to All) entitled "Residential and Other Built Environment" has been augmented to indicate that the project could use buildable areas of the property that preclude additional development or use.
Moffat County Colorado Nat Resources Dept	163-430	The top paragraph on 3.17-31 discusses the highest and best use fonnulas for properties where power line easements are acquired, yet unforeseeable programs such as the Credit Exchange Program reveal a completely new highest and best use that must be evaluated. The EIS should address handling unforeseeable higher and better uses as they develop.	Due to the infancy of the Credit Exchange System and the speculative nature of the applicability, availability, and potential impacts to land owners in and near the transmission line, this pilot program is not a part of the analysis in the FEIS.

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Commenter Name	Comment ID	Extracted Comment	Response
Moffat County Colorado Nat Resources Dept	163-431	Coal Resources and Mining Plans: Moffat County has commented previously (February 17, 2012) during the Gateway South planning process (and copied Trans West) regarding the omission of Coal resources in the Resource Inventory Maps. The Green River-Hams Fork Final EIS Coal (USDI #I 05.433 Feb 29, 1980) identifies several coal resources that are economically and technologically recoverable. These resources should be identified in Section 3.14.6 and Table 3.14-7. Specifically the Williams Fork Mountain Tract has finished testing by Trapper Mine. Trapper Mine is currently analyzing options that would require millions of dollars to move two existing high voltage transmission lines to mine this coal resource. If TransWest Express lines were to be built along the proposed Craig/Hwy 13 route, additional expense would be required to move them to allow the leased coal to be mined. BLM has stated the proposed route does not cross this area proposed to be mined, but maps in the Alternative C of this DEIS show differently. This inconsistency should be further clarified. The above mentioned Final EIS Coal identifies lands in the Bell Rock Tract, Empire Tract, and Iles Mountain Tract with significant coal reserves. Cottonwood Land Company owns the Empire Mine, a subsidiary of Peabody Energy, and has identified this area for a future underground mine. The coal resources are currently not leased, but are identified as a future possibility. If access to these or any of the reserves listed in the Coal EIS were limited by power line locations, BLM would forego significant revenue and an estimate of the dollars foregone from Trans West line should be estimated. Moffat County requests the coal resources be identified and an impact analysis be performed on Alternative C regarding the cost and logistics of moving a power line where coal mine resources have been identified, and at least in Trapper Mine's case, will require moving the line.	Please refer to the discussion in Section 3.2.6.3 for Alternative I-C. The alternative does not cross the coal tracts identified in the Hams Fork–Green River FEIS (BLM 1980). Also, it is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Please see response to comment 605-859 for more details.
Moffat County Colorado Nat Resources Dept	163-432	Greater Sage Grouse I Local Conservation Plans I Habitat Equivalency Analysis: The Moffat County Commission generally supports the concepts of Habitat Equivalency Analysis. Which are very similar to compensatory mitigation philosophies, however broad reaching concepts can sound good until the details have been discussed. Therefore, we look forward to discussions about how the details will be addressed. Distance from corridors that mitigation may occur are critical in these discussions. Moffat County generally does not support mitigating impacts in areas long distances from where the impacts occur. Local basin compensation, generally within the same watershed. Is most favorably looked upon. Mitigation long distances from the effect can result in sacrificing one area in favor of another miles, counties, or states away, and is generally less favorably looked upon.	Comment noted. Information regarding compensatory mitigation for impacts to greater sage-grouse habitat is presented in Section 3.8.6.4 (DEIS page 3.8-59). TransWest and the BLM are currently developing a Habitat Equivalency Analysis (HEA) to determine the need for compensatory mitigation. It is the intent of TransWest and the BLM to identify local areas where compensatory mitigation can be applied to offset residual impacts to sage-grouse. Completion of the HEA process is anticipated to be concurrent with the release of the TWE FEIS.
Moffat County Colorado Nat Resources Dept	163-433	See February 5, 2011 Joint Resolution between Moffat County Colorado, Carbon County, Wyoming, and Sweetwater County Wyoming regarding tri-county preferred power line corridor and route (attached).	This resolution has been previously received, considered, and entered into the Project record.
Moffat County Colorado Nat Resources Dept	163-434	See August 9, 2011 Memo to Sharon Knowlton regarding proposed transmission line routes being analyzed (attached).	The comments contained in the referenced memo were considered in the Draft EIS.
Moffat County Colorado Nat Resources Dept	163-435	See February 17, 2012 Memo to Tamera Gertsch comments on Gateway South Resource Inventory Maps (attached).	The comments contained in the referenced memo were considered in the Draft EIS.
Moffat County Colorado Nat Resources Dept	163-436	Page 1-11, Line 26Although BLM does not regulate private lands, emphasis should be made by BLM to the proponent that condemnations should not be held over private landowners as threats for negotiations, and that good faith negotiations for easements are necessary.	As disclosed in Section 1.6 of the Draft EIS, Western has committed to working with citizens and landowners to address any concerns regarding acquisition of any private lands required for Project implementation, should it decide to participate and views effective public involvement and engagement as a much more productive route than exercising eminent domain authority.
Moffat County Colorado Nat Resources Dept	163-437	Page 1-13, Line 21Moffat County requests the 1980 BLM EIS listing coal reserves be listed as identified conflicts of proposed routes. Power lines cannot be placed over economically viable coal reserves for existing coal mines without forcing significant cost in relocation of lines when mining occurs.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Due to the thousands of miles of alternatives, it is not feasible to analyze all of the claims and leases for validity or potential commerciality, or mitigate for all possible situations that may arise with regard to resource conflicts. It is also not possible for the BLM to dictate the terms and conditions in agreements between the applicant and mineral owners or lessees. The BLM will issue a ROW grant that is consistent with applicable regulations but recognizes that the applicant must acquire all access permissions in mixed ownership situations and it is expected that mineral rights conflicts would be resolved prior to construction. The proposed transmission line, when constructed, will occupy a 250-foot wide ROW. The 250-foot wide ROW should facilitate resolution of many perceived conflicts. The terms and conditions of the ROW grant, as specified in 43 CFR Subpart 2801, includes “the right [of the BLM] to require common use of the right-of-way, and the right to authorize use of the right-of-way for compatible uses (including the subsurface and air space).” The BLM recognizes that subsurface activities (in this case, mineral extraction) may not in all cases be compatible with the intended ROW use but as stated above, potential conflicts must be resolved prior to construction. It also should be noted that although many unpatented mining claims have dubious validity, it is the responsibility of the ROW grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Moffat County Colorado Nat Resources Dept	163-438	Page 2-9Moffat County appreciates BLM using scoping information and considering the Seven Mile Ridge route in its alternative analysis.	Thank you for your comment.
Moffat County Colorado Nat Resources Dept	163-439	Page 3.1-14, Line 24BMP's should include a common sense factor where blasting and fugitive dust prevention measures should be weighed against how much of an impact they will have on people vs. the cost of mitigation. Where most of the route will proceed, it will not affect people or rare plant communities and thus BMP's for fugitive dust may not be necessary. The same comment applies to GHG emissions and air quality measures where no federal standards will be exceeded.	The BMPs were taken from the WWEC PEIS and are considered appropriate. The text was revised to read: "The following BMPs from the WWEC PEIS are included in the project plan:"
Moffat County Colorado Nat Resources Dept	163-440	Page 3.2-26, Line 6Moffat County appreciates economic impact considerations BLM is 3.4 evaluating regarding power line construction. We request oil reserves be mapped from the Niobrara oil resource. As well the 1980 coal EIS coal reserves be identified and economic analysis be conducted on these resources. Accurately mapping the above identified land uses will avoid conflict with power line locations.	The mapping of oil and gas resources and coal reserves is out of scope of the EIS. The document has disclosed that these resources exist in the vicinity or underneath proposed alternatives based on readily available information provided by government agencies. Mineral resource assessment is a time-consuming process dependent on the assimilation and analysis of large amounts of data. Government agencies such as the U.S. Geological Survey conduct resource assessments by science and engineering professionals under strict guidelines and procedures and the results of the assessments are publically available and often updated, depending on the level of activity associated with a particular resource.
Moffat County Colorado Nat Resources Dept	163-442	Page 3.5-5, Line 2Consider changing the agriculture classification name to include livestock grazing. Livestock grazing is agriculture in Moffat County, which is most of the ag land use under the proposed power line routes. In other areas of the PDEIS grazing is categorized, but it is not mentioned in this section of the RMP.	The vegetation categories are based on the SWReGAP vegetation community classification. The bulk of the livestock grazing areas in the mapped vegetation community are found under the other vegetation communities, including grasslands, and shrublands. The impacts to livestock grazing are covered in Section 3.14 Land Use.
Moffat County Colorado Nat Resources Dept	163-443	Page 3.5-20, Line 3Clarify if disturbance is footprints of power line or if disturbance considers right of way for access, or both.	Disturbance impacts considers both operation and construction disturbance. These impacts include surface disturbance associated with the footprints of the transmission line facilities, access roads, temporary work areas, and ROW vegetation management.
Moffat County Colorado Nat Resources Dept	163-444	Page 3.8-7, Line 13Please incorporate "compensatory mitigation" within a short distance of power lines for grouse habitat mitigation. Moffat County will certainly share with BLM our vision for how compensatory mitigation could occur regarding grouse. The option for compensatory mitigation needs to be allowed in this PDEIS.	Comment noted. Information regarding compensatory mitigation for impacts to greater sage-grouse habitat is presented in Section 3.8.6.4 (DEIS page 3.8-59). TransWest and the BLM are currently developing a Habitat Equivalency Analysis (HEA) to determine the need for compensatory mitigation. Completion of the HEA process is anticipated to be concurrent with the release of the TWE FEIS.
Moffat County Colorado Nat Resources Dept	163-445	Page 3.8-8, Line 1Identify that although BLM ground contains some brooding habitat. a larger portion of brooding habitat in Moffat County is on private lands, thus the requirement for private I public partnerships and a PDEIS recognition that private and federal nexus exists for the survival of sage grouse.	Comment noted.
Moffat County Colorado Nat Resources Dept	163-446	Page 3.8-12, Line 18Moffat County appreciates BLM acknowledging the ExPA designation for Black-Footed Ferrets.	Comment noted.
Moffat County Colorado Nat Resources Dept	163-448	Page 3.8-35, Line 19This paragraph talks about grouse colliding with power lines as being a 'direct' impact. Please add language which places this in perspective with other direct and indirect grouse losses. Compared to other direct and indirect grouse losses, this paragraph disproportionately appropriates grouse losses to power lines.	Comment noted. The text referenced in this comment refers to issues identified during the public and agency scoping process. Although the frequency and magnitude of avian collisions with transmission lines is not well defined in the current scientific literature, it is a verified impact to avian species. No change to text.
Moffat County Colorado Nat Resources Dept	163-449	Page 3.8-36, Line 29The following several paragraphs discuss mortality of Sage grouse from power lines. It would be helpful to explain logic behind leks within one mile of existing power lines around Elk Springs and Massadona which are maintaining or increasing in grouse populations. This should highlight that not all cases of power lines result in lek reductions, which is certainly inferred from the PDEIS language.	Thank you for your comment. Literature regarding the effects of transmission lines upon greater sage-grouse populations is inconclusive. Although instances of leks in proximity to transmission lines do exist, contrary evidence supporting the potential for adverse effects to this species also exists. Text of the TWE FEIS will be updated to reflect the latest peer reviewed literature.
Moffat County Colorado Nat Resources Dept	163-450	Page 3.13-1, Line 2: The BLM RMP for the Little Snake Field Office clarifies that visual resources are evaluated from the outside boundary looking in, not the inside looking out, please clarify that is the intent of the power line EIS.	The commenter is correct in that BLM evaluates visual resources from the outside boundary looking in. However, there is nothing contrary to this approach included in the DEIS. Therefore, no changes have been made.
Moffat County Colorado Nat Resources Dept	163-451	Page 3.14-3, Line 3: FLPMA requires BLM to identify consistencies and inconsistencies between County and Federal Land Use Plans. This may not be the correct location in the EIS for this evaluation. But it does need to be performed.	Section 3.14. 1.1 was revised to indicate that the section includes an analysis of consistency with local plans and policies. The analysis of consistency with federal plans and policies is included in Chapters 1 and 4.
Moffat County Colorado Nat Resources Dept	163-452	Page 3.14-11, Line 7Please Identify that a significant portion of the Yampa Valley Trail is on primary and secondary Moffat County Roads. Therefore use is not simply hiking, biking, wildlife viewing, mountain biking and OHV use. Significant portions of this road are used for major commerce, such as hauling goods and services, livestock transport, and other daily uses of county roads. This section gives the reader the impression the Yampa Valley Trail is a remote trail used for only recreation, when the fact is that significant commerce and daily commuting of ranchers occurs on this road.	Text was added to the description of the Yampa Valley Trail in Table 3.13-6 regarding location of the trail on county roads that are also used for commerce.
Moffat County Colorado Nat Resources Dept	163-453	Page 3.15-2, Line 5Please include the Moffat County Land Use Plan: Federal Lands, in addition to the Moffat County Master Plan.	The commenter appears to be referring to Section 3.14 (Land use), not 3.15 (Special Designation Areas). Table 3.14-2, County Planning Documents, was updated to include the Moffat County Land Use Plan.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Moffat County Colorado Nat Resources Dept	163-454	Page 3.15-16, Figure : Moffat does not understand the significance of mapping all contiguous BLM lands greater than 5000 ac. If mapping goes toward identifying possible WSAs or L WCs the 5000 acre minimum does not warrant being mapped. As there are several factors rating appropriateness of LWCs that eliminate virtually all lands with greater than 5000 contiguous acres. Please clarify intent of mapping lands greater than 5000 acres and consider deleting this map.	It is assumed this comment is referencing Figure 3.20-1. The current regulatory requirements for maintaining a wilderness character inventory (FLPMA Sec. 201 and BLM Manuals 6310 and 6320) are explained in the regulatory background for this section (Section 3.20.1). Each BLM office maintains the wilderness character inventory and that information is used in the EIS process to disclose impacts anticipated from the proposed Project. The figures reflect all units identified by the BLM Field Office for inventory of lands with wilderness characteristics. No changes have been made to the document.
Moffat County Colorado Nat Resources Dept	163-455	Page 3.17-1, Line 1: Generally the socioeconomic section does not list dollar number estimates for tax base impacts, land values, dollars that will influx with wages, taxes, and purchases. There is a general big picture expense for the power Line, but these dollars are not broke out to the different sectors of our economy. Identifying multiplier effects and roll over dollars within communities from power line construction and long term operation are critical. Simply stating there will be an effect is not enough, dollar figures must be tied to effects.	Updated estimates of sales and use and ad valorem tax revenues, provided by TransWest, were added to Section 3.17.5 of the Final EIS (see Tables 3.17-13 through 3.17-15). Construction cost, scheduling, and logistical information (such as the locations of construction staging areas, construction management offices, and helicopter bases) available at this time did not support estimates of economic effects at the county or community level due to the temporary/transient nature of transmission line construction as it moves along the corridor.
Moffat County Colorado Nat Resources Dept	163-456	Page 3.17-5, Line 4: Social economic condition seems to be generally focused on recreation and oil and gas. Please add more description of coal mining, power plant operations, agriculture.	The referenced text on pg. 3.17-4 of the Draft EIS was revised to expand on the role of natural resources in supporting local economies.
Moffat County Colorado Nat Resources Dept	163-457	Page 3.17-2, Line 26: Using publically available data for socio economics divulges only part of the economic picture. There are local reports such as the Yampa Valley Data Partners (Community Indicators Report) that list average wages, rollover multiplier effects, etc. that should be considered to determine true economic value of power lines within a community.	Text was added in several locations (e.g., Sections 3.17.5.1 and 3.17.5.2) to reiterate the multiplier effects on income. However, as noted in Section 3.17.5.2, these effects would be short-term, of limited scale, and not particularly sensitive to local wage rates and labor availability due to the progression of construction activity along a corridor and the dominant role of non-local labor under an agreement between TWE and the IBEW regarding the use of union labor and payment of union wage scales.
Moffat County Colorado Nat Resources Dept	163-458	Page 3.17-27, Line 1: Include hard dollar figures on how land values have been affected in different parts of the Country. Statements that say land values will be affected are not complete, dollar figures or a range of figures. Should be attempted to be assigned.	Direct effects on private land values are assumed to be addressed through right-of-way/easement negotiations between TWE and private property owners. General magnitude estimates of indirect/secondary effects on private lands near the corridors are discussed on pgs. 3.17.30-31 of the Draft EIS. Monetary values are typically not established for public lands.
Moffat County Colorado Nat Resources Dept	163-459	Page 4.5-5, Line 24: It is not true to assume that if lines are co-located in existing corridors that there will be minimal conflicts. Trapper mine plans to move the existing two power lines running through their mine, at a cost of several million dollars, simply so coal can be extracted under them. Using the 1980 Coal EIS to block out future extractable coal resources and assure power lines do not cross them will assure additional burdens are not placed on the local coal mines in Moffat County.	Impacts to mineral resources from placement of the proposed Project is discussed in detail in Section 3.2, Geology, Paleontology, and Mineral Resources, which includes specific information on relation of the proposed Project to areas suitable for coal leasing (see Section 3.2.5.1). Chapter 4 discloses impacts of the proposed plan amendment to establish a new utility corridor and the associated impacts to potential or known mineral activity in that specific area. The analysis in the Draft EIS for mineral activity in this area of Moffat County does not make an assumption of "minimal conflicts", but rather states "The land within the proposed utility corridor is available for mineral development; however, there is no active mineral activity in this area. Concentrating utilities in this area could compete with the ability to access and develop mineral resources. However, proposed utilities would have to recognize valid existing rights and work with leaseholders to minimize conflicts."
Moffat County Colorado Nat Resources Dept	163-460	Page 4-54, Line 35: General comments about increase or decrease of social economics related to the power line are not as helpful as ranges of dollar figures. Please add dollar figures.	Direct impacts to social economics are discussed and quantified, where possible, in section 3.17 Social and Economic Resources.
Moffat County Colorado Nat Resources Dept	163-461	Page 5-3, Line 19Please include the recent development of the Niobrara Oil Field around Craig, Colorado.	Section 5.2.1.1, Past and Present Actions, was revised to acknowledge current Niobrara oil and gas development in northwest Colorado. Currently, many wells have been proposed in Moffat County to test the Niobrara but results to date have yet to prove whether the Niobrara play constitutes a long-term resource play in Moffat County. In August 2013, Shell Oil put its Moffat County assets up for sale, although it continued to drill in order to honor lease commitments.
Moffat County Colorado Nat Resources Dept	163-462	Page 5-18, Line 19Rather than offsetting power lines from existing well pads, it seems more appropriate to consider permitted pads, considering the Niobrara is permitted two years in advance of some development. While only a dozen wells were drilled in the Niobrara in Moffat County, over 55 permits were issued. There is a large discrepancy for what has been completed and what has been permitted to be completed and the PDEIS should consider what has been permitted. Perm it data are available from the Colorado Oil and Gas Conservation Commission.	Section 5.2.1.1, Past and Present Actions, was revised to acknowledge current Niobrara oil and gas development in northwest Colorado. Currently, many wells have been proposed in Moffat County to test the Niobrara but results to date have yet to prove whether the Niobrara play constitutes a long-term resource play. In August 2013, Shell Oil put its Moffat County assets up for sale, although it continued to drill in order to honor lease commitments. TransWest will be required by the lead agencies to coordinate with holders of valid existing rights in Niobrara as necessary to minimize impacts on the development of these rights.
Morrison, David	612-1916	Again, it appears your Draft EIS picked longer routes without considering the economic impacts on the people buying this power in California, and the Final EIS should be updated to reflect that fact.	The routing alternatives do not directly consider the effect of corridor length on the price of power to consumers. Rather, routing reflects major environmental and land use constraints and the constructability of an alternative. Finally, the effects of alternatives on rates paid by consumers are beyond the scope of this EIS. No changes in the text resulted from this comment.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
N-4 State Grazing Board	693-1856	The Board has reviewed the DEIS, and found it to be inadequate in terms of analyzing impacts to livestock grazing. In general, the DEI estimates the "construction-related grazing reductions" and the "grazing reductions under project operations" in Animal-Unit Months (AUMs) based on the anticipated number or acres of disturbance for each project segment. The DEI implies that the impacts to grazing do not constitute a significant impact. This analysis is incomplete for the following reasons: 1. It does not disclose the anticipated loss of AUMs for each allotment along the route;a. Applicant Proposal III-A crosses I grazing allotment within the Caliente FO b. Agency Preferred 111-B crosses 12 grazing allotments within the Caliente PO c. Alternative 111-C crosses II grazing allotments within the Caliente FO 2. It does not disclose the impacts to existing range improvements, including but not limited to: seedings, water developments, natural water sources, cattle guards, fencing, corrals, etc; 3. It does not disclose the impacts to private property, including water rights; 4. By lumping all allotments together across each project segment, the analysis dilutes the true project impacts to permitted livestock grazing administered by the BLM Ely District; 5. Mapping is not of adequate detail to allow individual permittees to determine the potential impacts to their allotments and subsequently their overall operation; 6. Without disclosing the allotment-specific impacts, and more detailed mapping, the DEI cannot adequately identify proper avoidance and mitigation measures to address the true impacts of the project; and 7. The DEI does not recognize the increased casual use and improved public accesses that will occur from the general public visiting this area by way of the roadways created and/or improved both during construction and continuing throughout the lifetime operation of this proposed trans mission project.	Site-specific impacts to specific allotments cannot be determined at this time. Based on estimated surface disturbance, and an average AUM, conservative estimates of impacts to range allotments in each region are provided for analysis. Any site-specific mitigation will be determined during the POD, and ROD process prior to construction as detailed in mitigation measure Range-1. Detailed information on range improvements is not available for much of the route, nor are site-specific disturbance locations available. To mitigate potential impacts to range improvements, range mitigation Range -1 to Range -5 provides that prior to construction and placement of structures, facilities, and access roads, the applicant will coordinate with the local BLM office and permittees to determine conflicts with grazing resources, and provide detailed mapping of existing range improvements. Discussion on potential increased access to grazing allotments has been added to the livestock grazing impact discussion.
N-4 State Grazing Board	693-1857	Further, the cumulative effects analysis, Section 5.0, fails to analyze or disclose the cumulative effects of past, present, and future government actions relating to livestock grazing, the majority of which occurs on public lands. Past analyses show that public land grazing in the BLM Caliente Field Office has been reduced by eight percent during the interval of 1980 to 1999. More recently, the Ely RMP disclosed that permitted public land grazing was reduced in the Ely District (which includes the Caliente Field Office) by 24 percent during the interval of 2000 to 2006. This continuing decline in public land livestock grazing was not disclosed in the DEI analysis, nor were the estimated contributions from TWE Project or other reasonably foreseeable projects to this ongoing trend disclosed in this DEIS. On this basis, the TWE DEI is lacking and deficient.	Chapter 5 of the Final EIS was revised to include a disclosure of the cumulative effects of past, present, and reasonably foreseeable future actions on livestock grazing.
N-4 State Grazing Board	693-1859	The Board suggests that if either the Agency Preferred 111-B, or the Alternative 111-C is chosen, then a supplemental DEIS is required to accurately disclose the impacts, and identify proper mitigation actions that result in no net loss of AUMs due to operation of the project.	Thank you for your comment. Section 3.14 of the FEIS discloses the potential impacts of all alternatives on grazing, including potential loss of AUMs. Proposed mitigation in Section 3.14 of the FEIS has been revised to include coordination between TransWest, BLM Field Offices, and Forest Service, as well as local government entities, to minimize impacts to permittees.
N-4 State Grazing Board	693-1860	The Board suggests the following actions to remedy this situation be funded by BLM and project proponent: • Develop allotment-specific mapping that includes all existing range improvements, and private property. Including water rights;	Range mitigation Range -1 to Range -5 provides that prior to construction and placement of structures, facilities, and access roads, the applicant will coordinate with the local BLM office and permittees to determine conflicts with grazing resources, and provide detailed mapping of existing range improvements.
N-4 State Grazing Board	693-1862	As a cooperating agency, the Board would like to remain actively engaged in this process moving forward. The Board requests inclusion in the BLM performance stipulations enumerated in your expected Record of Decision, following the Final EIS. The Board would like to see a requirement that affected grazing permittees be consulted with by the Trans West Express/WAPA group and their chosen construction contractor to recognize, plan for, and mitigate project associated impacts. These local representatives should be included in pre-construction inventories and planning meetings to provide location specific information and work together with BLM and Trans West. This collaborative process will promote a positive working relationship between all affected parties, and minimize adverse impacts.	The mitigation measures proposed in the Section 3.14 of the Draft EIS (see Range-1 and Range-4 specifically) include provisions for consultation with grazing permittees to plan for and mitigate project-associated impacts.

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Commenter Name	Comment ID	Extracted Comment	Response
National Park Service	613-756	Two portions of the proposed TransWest line are portrayed in the DEIS as potentially crossing NPS lands-through Lake Mead National Recreation Area (NRA) and through Dinosaur National Monument (NM). The National Park Service Organic Act of 1916 requires the NPS "to conserve the scenery and the natural and historic objects and wild life therein and to provide for the enjoyment of future generations." 16 U.S.C. §1. As such, the NPS is under congressional mandate to protect park resources from activities that would impair or be a derogation of the values and purposes for which the park units are authorized or that are incompatible with the public interest. Moreover, NPS Director's Order #53 states that "The NPS may issue right-of-way permits only for those uses or activities specifically authorized by Congress and only if there is no practicable alternative to the use of NPS lands." The portions of the proposed Trans West line that are on NPS lands are incompatible with the units' General Management Plans (GMP), and practicable alternative routes are available nearby. The NPS strongly supports the use of the practicable alternatives, for consistency with the NPS mission and to minimize impacts upon the visitor experience. Further details appear in the specific comments.	Section 3.15.3.2 of the Draft EIS discloses the "no impairment" standard of the Organic Act and that ROWs are issued generally only if there is no practicable alternative to use of NPS lands. The analysis contained in Section 3.15. 4.3 (Alternative I-D subsection) of the Draft EIS discusses these standards and indicates that there is a practicable alternative to crossing Dinosaur NM. Lake Mead NRA is primarily discussed in Section 3.13, Recreation of the Draft EIS, although Section 3.15.4.6 does acknowledge that the NPS has indicated that constructing the project would be incompatible with NRA management. An additional subsection will be added to Section 3.15.3 of the Final EIS to identify management stipulations from the Lake Mead NRA General Management Plan, and the "no impairment" and "no practicable alternative" standard of the Organic Act and NPS Director's Order #53. The analysis will be updated appropriately to reflect this language.
National Park Service	613-757	If the proposed routings across NPS lands are retained as alternatives requiring issuance of Rights of Way (ROW) from NPS, then site-specific analyses are needed in the NEPA documents on which NPS can base a decision, as required by NPS Director's Order #12. With regard to the route across Dinosaur NM at Deerlodge Road, to ensure that all needed information is available for NPS decision-making, NPS refers to BLM to the Intermountain Regional Director's memo of April 19, 2013 (attached); NPS and BLM will need to further communicate on specific requirements, in particular, the need for more information on potential impacts to viewshed, soundscape, and the visitor experience. (reference to attached directors letter was not attached)	Potential impacts to NPS lands, including Dinosaur NM and the Lake Mead NRA, resulting from the proposed Project were disclosed in the resource-specific sections of Chapter 3. Section 3.12 includes analysis from updated key observation points (KOPs) in relation to the Tuttle Ranch Micrositing Options that cross Deerlodge Road. Text in Section 3.15 regarding the applicable NPS policy and plans for Dinosaur NM and Lake Mead NRA was incorporated. Impacts to the visitor experience in Dinosaur NM and Lake Mead NRA are addressed in Section 3.13. If any routes that cross NPS lands are selected for this Project and a NPS ROW is required, further coordination with NPS would occur at that time to ensure all applicable information to support a NPS decision is provided.
National Park Service	613-758	The NPS appreciates the cooperation of the BLM in response to concerns about impacts on the Old Spanish National Historic Trail and the Mountain Meadows National Historic Landmark. The agency-preferred alternative will have significantly fewer impacts on these national treasures than previously considered alternatives. While the trail impacts will be lower for the preferred alternative than for other alternatives, NPS encourages the BLM to continue working with stakeholders to lessen impacts to the Old Spanish NHT through avoidance, minimization, or other compensatory means.	As noted in Section 3.15 of the Draft EIS (Special Designations), once the final route is selected, an intensive Class III inventory and in-depth visual analysis would be conducted to determine the impact to contributing Old Spanish NHT segments crossed by the route or from which the route would be visible. If a contributing segment would be adversely affected, the effects would be minimized or mitigated onsite or offsite as stipulated in the Cultural Resources PA developed for the Project and through implementation of design features and BMPs in concert with the Trail Study Agency and the Wyoming BLM National Trails Management Program Lead.
National Park Service	613-759	Page 1-1, Section 1.4.2.5Based on Lake Mead National Recreation Area (NRA) review, the alternative routes through the park are not consistent with the approved General Management Plan Service (GMP), Environmental Impact Statement (EIS), and Record of Decision for Lake Mead NRA. The proposed right-of-way (ROW) would be located in the park's environmental protection subzone, the lands that are most sensitive and identified for protection. The proposed alternatives also appear inconsistent with Lake Mead NRA's enabling legislation. The NPS is aware that legislation has been introduced in Congress to release the Sunrise Mountain Instant Study Area and allow the BLM to implement its Resource Management Plan and expand the existing utility corridor in that area. The NPS supports this legislation and the use of the existing utility corridor, and is actively tracking the status of the proposed legislation. NPS Director's Order #53 states that "The NPS may issue right-of-way permits only for those uses or activities specifically authorized by Congress and only if there is no practicable alternative to the use of NPS lands." The Sunrise Mountain Instant Study Area appears to contain a practicable alternative to the use of NPS lands. The National Park Service (NPS) is unaware of any authority that would allow TransWest Express access to any land to conduct commercial activity within Lake Mead NRA without the NPS's express written permission.	Section 3.15.4.6 of the Draft EIS does acknowledge that the NPS has indicated that constructing the project would be incompatible with Lake Mead NRA management. Section 1.4.2.5 of the Final EIS has be updated to include the clarifying language you provided. Section 3.15.3 of the Final EIS has be updated to identify management stipulations from the Lake Mead NRA General Management Plan, and the "no impairment" and "no practicable alternative" standard of the Organic Act and NPS Director's Order #53, and the analysis in Section 3.15 updated appropriately to reflect this language. Section 3.15 will has also be updated to describe proposed legislation to release the Sunrise ISA. This will be carried through the analysis to identify the Sunrise ISA option a potential practicable alternative to crossing NPS lands.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
National Park Service	613-760	Page 1-1, Section 1.4.2.5Based on Dinosaur National Monument (NM) review of the DEIS, the alternative routes through the park are not consistent with the approved General Management Plan (GMP), Environmental Impact Statement (EIS), and Record of Decision for Dinosaur NM. The GMP lists industrial use of the park as an "incompatible use", and also states that the purpose of the congressionally authorized scenic easements along the road corridor is to "protect the visual quality of the road".The NPS recently became aware that a half mile of road corridor on the Deerlodge Road is owned by the State of Colorado, with NPS holding a ROW grant to construct and maintain the road and vegetation. The solicitor's office has confirmed to the NPS that no ROW grant from NPS would be necessary for transmission lines to cross that portion of Deerlodge Road. NPS Director's Order #53 states that "The NPS may issue right-of-way permits only for those uses or activities specifically authorized by Congress and only if there is no practicable alternative to the use of NPS lands." The NPS supports the use of the state lands practicable alternative, or other practicable alternatives nearby, for completion of transmission lines in this area.Even if the proposed routing across the NPS-managed portion of Deerlodge Road is eliminated from consideration, the analysis should still consider potential cross- boundary impacts to the nearby park lands and to visitors utilizing the road to enter the park. The NPS encourages a thorough analysis of potential impacts to park resources and values. The level of analysis, however, would be based on BLM and CEQ standards only and would not be subject to the specific requirements of NPS DO #53 if NPS is not issuing a permit for the transmission line.	Information regarding management stipulations from the Dinosaur NM General Management Plan has been incorporated into Section 1.4.2.5 (as well as Section 3.15). A new micro-siting alignment that crosses the Deerlodge Road corridor within State lands has been included in the Final EIS.
National Park Service	613-761	Page 1-1, Section 1.4.2.5Deerlodge Road is a Congressionally-authorized portion of Dinosaur NM. Throughout the document, it should be clear that the road is inside the Monument and is entitled to the same legal protections as other NPS lands. There is no legal basis for distinctions drawn in the EIS such as "the Monument proper." If the proposed alternatives through NPS lands are retained, with accompanying applications for ROW's, then site-specific analyses are needed in the NEPA documents. NPS refers the BLM to the NPS Intermountain Regional Director's memo of April 19, 2013, containing needs for NPS site-specific analyses in the NEPA process for Dinosaur NM (attached). To ensure that all needed information is available for NPS decision-making, NPS and BLM will need to further communicate on specific requirements. In particular, NPS needs more information to determine visual and noise impacts.	The sentence in Section 1.4.2.5 will be revised to eliminate references to the "Dinosaur National Monument proper", which is not included elsewhere in the EIS. The impacts to the NM will be disclosed in the resource-specific sections of Chapter 3. If any routes that cross NPS lands are selected and an NPS ROW are required, NPS standards of analysis will be met pursuant to additional NEPA.
National Park Service	613-762	Page 1-1, Section 1.4.2.5It should be noted that NPS participation as a cooperating agency in the development of this document does not constitute written permission for any of the alternatives, does not commit the NPS to any action in regard to the approval or disapproval of this project, and in no way constitutes authorization of any transmission line and/or road through lands under NPS jurisdiction. These comments are not intended to imply that the NPS is using this document to make any decision on the proposed alternatives through Lake Mead NRA or through Dinosaur NM.	Comment noted. As disclosed in Section 1.0 of the Draft EIS, the cooperating agency relationship ensures that the BLM engages and considers comments of these agencies when making Project decisions and includes information required to satisfy the environmental and public review processes associated with those decisions; however, while the EIS contains sufficient information to allow the BLM and Western to choose among alternatives, in some instances, cooperating agencies may require additional information before making decisions related to specific lands within their jurisdiction. Section 1.4.2.5 of the Final EIS has been revised to include additional detail regarding this.
National Park Service	613-763	Page 3.13-95The document does not adequately recognize the difference between Congressional designations and agency administrative designations. The document continues to treat the Congressionally designated Lake Mead NRA in a fashion similar to local Recreation administrative designations like BLM Dispersed Recreation Areas and Special Areas Recreation Management Areas. In earlier comments the NPS highlighted the differences between these designations, the establishment of Lake Mead NRA being Congressional and the others administrative. Likewise, Dinosaur NM was created by Presidential Proclamation, and Deerlodge Road was designated by Congress as part of the park. The NPS requests that the BLM acknowledge the differences and identify the appropriate protection mandates associated with units of the National Park System, which are of national significance and created by Congress, the President, or some combination. The NPS suggests that the document separate units of the National Park System from other agency designations, and represent the higher level of protection provided to these units by Congressional action, regulation, and NPS policy.	An additional subsection was added to Section 3.15.3 to identify Lake Mead NRA as a congressionally designated National Recreation Area, including the management stipulations from the Lake Mead NRA General Management Plan and the "no impairment" and "no practicable alterative" standard of the Organic Act and NPS Director's Order #53, which convey the additional protection mandates afforded to units of the National Park System. The analysis was updated appropriately to reflect this language. Reference to Section 3.15.4.6 was added to the text in Section 3.13.6.12 on impacts to Lake Mead NRA. In Section 3.13.4.4, the text under National Recreation Areas specifically states, "Congressionally designated units of the NPS, including national recreation areas, and other similar Congressionally designated areas under the management of other agencies, have a higher level of national significance and protection than agency-designated land use classifications." Under Region IV, Lake Mead NRA and Sloan Canyon NCA are under a separate heading titled "Other Federally Managed Recreation Areas". Dinosaur National Monument has been listed under this same heading in Sections 3.13.6.9 and 3.13.6.10.
National Park Service	613-764	Figure 3.14-17: This Figure illustrates the agency designated avoidance areas for this project. The BLM ACECs are identified as avoidance areas. Lake Mead NRA, a Congressionally designated unit of the National Park System, is not shown as an avoidance area. The document should be revised to show that units of the National Park System have a higher level of protection than agency-designated land use classifications. The NPS recommends that this Figure, and the supporting text, be revised to show that NPS lands have a higher level of avoidance than the agency designated land use classifications.	Figure 3.14-17 was revised to depict the Lake Mead NRA as a congressionally designated unit. Additional text was included to explain the levels of protection associated with congressionally designated areas.

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Commenter Name	Comment ID	Extracted Comment	Response
National Park Service	613-765	Section 3.12, Appendix I: There is no way to discern the extent of specific impacts to NPS lands at Dinosaur NM or at Lake Mead NRA. The segments of alternatives crossing the NPS lands are identified in the analysis tables, but the level of impacts to NPS lands is not identified separately. To address impacts to NPS lands, please include the following: • Photos and description of the existing visual setting of NPS lands, including the entry kiosk and traveling along the entry road to and from Deerlodge Park, Dinosaur NM entry and Lake Mead NRA Key Observation Points (KOP's). Include description of topography/landform, vegetation, and other characteristics to provide viewer experience along NPS roadway. • Provide detailed description of how construction activities, including access, equipment locations, restoration and other activities will avoid NPS lands. • Describe changes to the existing landscape based on the current Visual Resource Management (VRM) inventory. Discuss changes in landform and vegetation and the extent to which changes occur in areas visible from NPS lands. • Include description of the change in the visitor experience of entering, leaving Dinosaur NM and using interpretive services at the entry kiosk along the Deerlodge Park Road. In the cumulative analysis section, please include the description of the change in visitor experience with two additional transmission lines on the corridor parallel to TransWest Express. Please provide remaining photos/simulations and analysis for KOPs from NPS lands for review prior to the Final EIS.	The method and result of the analysis is based on direction from the BLM. KOPs have been updated at the direction of the BLM to reflect to preliminary engineered alignment shown in the Final EIS.
National Park Service	613-766	Appendix I, Simulations: The simulations are generally not adequate to determine potential impacts to NPS lands. The following general comments are noted for the approach to the simulation, and a list of additional information that should be provided for each simulation is below. Provide a detailed methodology of how simulations were developed including photography procedures, methods used to place models of structures in correct locations and other details to communicate the accuracy of the simulations. The KOP photos and the Google Earth images showing structure locations are typically not very well matched and appear to be from different locations. To assess the potential impacts of the project the KOP photo and the simulation (the before and after) should be the same size. The general field of view is considered to be about 124o wide x 55° tall. The photos appear to cover a much smaller area. Please indicate where the KOP photo falls within the wider field of view. The Google images are generally ineffective at showing the location of structures in relation to the KOP photos. Getting the KOP photos and Google images to match as noted above may help but consider putting the "wireframe" structures on the photo if the intent is to just show location prior to completing the simulation. Please provide the following information for the simulations to allow for accurate assessment of potential visual impacts: • Horizontal and vertical width of field depicted in the simulation • Correct viewing distance from which to view the images, in the desired presentation format, to simulate the view at the KOP; • View direction; • Weather conditions; • Lighting condition (front lit, backlit, side lit); • Camera and lens make and model; • Focal length used for photograph (for film SLR cameras) or 35mm equivalent focal length for digital SLR cameras; • Distance to nearest visible portion of facility, e.g. the nearest visible tower structure.	The google earth image with structure placement is a reference for location and height and is not a Project simulation. Structures were digitized in ArcGIS based on location specifications by the applicant. The simulations are photographic. The default google earth images are of a wider view angle (60 degrees) than the simulation photography. The google earth 3-D image and AutoCAD 3-D model of the structure are merged into Photoshop for placement and scaling in the final simulation model. <ul style="list-style-type: none"> • Horizontal and vertical width of field depicted in the simulation - 47 degrees horizontal and 27 degrees vertical • Correct viewing distance from which to view the images, in the desired presentation format, to simulate the view at the KOP - One foot • View direction - Toward the alignment of the Project. The ArcGIS KOP map shows compass direction. • Weather conditions - Representative condition • Lighting condition (front lit, backlit, side lit) - Front lit or side lit • Camera and lens make and model - Nikon D200 • Focal length used for photograph (for film SLR cameras) or 35mm equivalent focal length for digital SLR cameras - 50mm • Distance to nearest visible portion of facility, e.g. the nearest visible tower structure - distance is based on the location of the KOP and location of the Project. The ArcGIS KOP map shows distance.
National Park Service	613-768	Section 2.8.1The NPS supports the use of alternatives that will minimize impacts to the Old Spanish National Historic Trail (NHT). The agency-preferred alternative will have fewer impacts than other suggested alternatives, which could impact up to 130 miles of the Old Spanish NHT. Alternatives of particular concern include COUT-BAX-8, C, & E. Construction of these alternatives would likely have major indirect and cumulative impacts on the trail setting, and direct impacts at the trail crossings. The NPS cannot envision any effective design features that would appreciably reduce the likely impacts to the trail if other alternative routes are selected. While the trail impacts will be lower for the preferred alternative than for other alternatives, NPS encourages the BLM to continue working with stakeholders to lessen impacts to the Old Spanish NHT through avoidance, minimization, or other compensatory means.	Section 3.15.4.4 of the Draft EIS contains an extensive analysis of impacts to the Old Spanish NHT, including impacts to setting. The lead agencies will continue to work with stakeholders as appropriate to minimize Project impacts to the Old Spanish Trail.
National Park Service	613-769	Page 3.18-1: It is incorrect that there are no federal noise regulations. The NPS suggests that the incorrect sentence be changed to "While there are no federal noise regulations that address transmission line noise specifically, federal agencies, states, municipalities and local governments may adopt regulations that impose a maximum noise limit or mitigation requirement within their jurisdiction." Moreover, the NPS is mandated to protect visitor experience and works to minimize outside noise impacts, as consistent with NPS Management Policies 2006 and the NPS Call to Action.	Text within Section 3.18.2 was modified as suggested.

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Commenter Name	Comment ID	Extracted Comment	Response
National Park Service	613-770	Page 3.18-4: The definition for noise is too narrow and does not address wildlife or protected natural environments. The NPS suggests the definition be changed to "Noise is defined as any sound that is undesired, extraneous, or interferes with hearing."	Text within Section 3.18.5 was modified per the comment.
National Park Service	613-771	Page 3.18-4: The second paragraph in section 3.18.5 contains several inaccuracies. At minimum, the NPS recommends the following changes (strikeouts used to show inaccurate statements that should be removed): (see original comment in letter for strikeout text)	Text within Section 3.18.5 was modified per the comment.
National Park Service	613-772	Page 3.18-5: The definition for ambient noise is not precisely correct. The NPS recommends the definition be changed to the one in ANSI S1.1 "Acoustical Terminology", which is a more authoritative reference.	Text within Section 3.18.5 was modified per the comment.
National Park Service	613-773	Page 3.18-6: Several sentences on line source geometric spreading rate are incorrect, as a line source results in cylindrical spreading, not spherical. The NPS recommends that the first sentence be changed to "As a result of geometric spreading, the noise level from a line source such as a power line will decrease by 3 dBA for every doubling of the distance away from the source." The additional sentences should be corrected or deleted.	Text within Section 3.18.5 was modified to delineate the differences in the decrease in noise from line and point sources.
National Park Service	613-774	Page 3.18-6: The NPS recommends reviewing Table 3.18-2 for accuracy. For example, it is not true that a 1 dB change "cannot be perceived", although a 1 dB change is most reliably detected under quiet, controlled laboratory conditions.	Table 3.18-2 within Section 3.18.5 was modified to state "insignificant" instead of "cannot be perceived" at the 1 dB level.
National Park Service	613-775	Page 3.18-1 to 3.18-6: The Noise section contains factual deficiencies of concern and falls short of disclosing the transmission line noise impacts from the proposed project. The NPS recommends best available practices for transmission line assessment (such as those in the Electric Power Research Institute (EPRI) AC Transmission Line Reference Book-200 kV and Above "Red Book") be used to adequately analyze and disclose impacts. The NPS Intermountain Region has a newly updated guidance for transmission line impact assessment that is consistent with the EPRI Red Book. If NPS will be making decisions to permit a ROW, analysis consistent with this NPS guidance will be requested.	While elements of the proposed Project consist of AC line segments, the majority of the Project is composed of DC transmission line which emits less noise than an AC transmission line. The current Agency Preferred Alternative would not cross NPS land; however, if an NPS ROW authorization were required for Project approval, then further coordination with NPS would occur at that time to ensure all applicable information to support a NPS decision is provided.
National Park Service	613-776	Section 6.1.3The NPS recommends that advertisements and media releases be sent to tribal media.	This recommendation has been noted.
National Park Service	613-777	Section 6.2Which tribes were invited to be cooperating agencies? Which tribes, if any, are involved as cooperating agencies?	Because alternatives in Utah and Nevada cross lands under the jurisdiction of the Moapa Band of Paiute Indians of the Moapa River Indian Reservation and Ute Indian Tribe of the Uintah and Ouray Reservation, both were invited to be cooperating agencies. Both tribes have signed an MOU establishing them as cooperating agencies.
National Park Service	613-778	Section 6.2.3The NPS recommends the guiding documents for consultation be cited, including but not limited to: Executive Order 13175, Secretarial Order 3206, DOI Policy on Consultation with Indian Tribes.	The text has been added as requested to Section 6.2.3.
National Park Service	613-779	Section 6.2.3: The narrative states, "The Ute Mountain Ute are concerned about Project impacts to human remains, cultural landscapes, TCPs and sacred sites," yet later in the narrative, it says "As of this date, no places of traditional religious and cultural importance to the contacted Native American Tribes have been identified in or near the analysis area through the government-to-government consultation efforts." In addition, in 3.11-1, the narrative states: "Railroad Valley was mentioned as an area of concern by several Tribal members." These portions of the narrative are difficult to reconcile- the NPS recommends recognition that the tribes have identified places of importance.	The Tribes mentioned that, in general, they are concerned about human remains, cultural landscapes, TCPs, and sacred sites, but have yet to identify any specific properties or places of traditional religious and cultural importance (including TCPs) within or adjacent to the analysis corridors. The text was revised to provide better clarification. Railroad Valley is located over 65 miles away from the analysis area and therefore, would not be affected by the Project. The text in Section 3.11.4.3 (which is where Railroad Valley is referenced) was revised to clarify the location of Railroad Valley relative to the Project.
National Park Service	613-780	Section 3.11.1.2: The NPS recommends the addition of the Religious Freedom Restoration Act.	The Religious Freedom Restoration Act was added to Section 3.11.1.2.
National Park Service	613-781	Section 3.11.4.3: In addition to those guiding documents listed, the NPS recommends adding Secretarial Order 3206, DOI Policy on Consultation with Indian Tribes, and other BLM agency-level guiding documents or policies.	Secretarial Order 3206: American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act was added to Section 3.11.1.2; DOI Policy on Consultation with Indian Tribes was added to Section 3.11.4.3.
National Park Service	613-782	Section 3.11.6: It is difficult to determine the number of sites impacted from the information provided. The NPS recommends reorganizing this data so that the number of sites impacted will be accessible to the reader.	In Section 3.11.6, the text states "the number of historic properties that would be adversely affected by the Project is unknown at this time." The text goes on to state that an intensive Class III inventory would be required along the final route after it has been selected by the agencies. In an attempt to provide the reader with a general idea of the types of sites that could be affected by the Project, the DEIS includes tables in Section 3.11.6 that list site information extrapolated from the files search data. Since previous inventories do not cover 100 percent of the alternatives, the files search data only provides a very narrow glimpse of what could be impacted by each alternative.
National Park Service	613-783	Section 3.11.6.1: Were Tribes notified about the isolated artifact identified?	As stated in Section 3.11.4.3, the Tribes received a letter in late September 2011, which included a description of historic properties identified through the files search; isolated finds were not listed in the letter. Only the Hopi Tribe responded to the letter.

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Commenter Name	Comment ID	Extracted Comment	Response
National Park Service	613-784	Section 3.11.6.2: Please provide information about BLM Law enforcement strategies to minimize the potential for illegal collection, vandalism and inadvertent damage. In addition, some State Historic Preservation Offices have good stewardship programs that monitor sites. The NPS recommends partnering with these state stewardship entities to protect important sites near the project.	The BLM does not have law enforcement strategies with regards to illegal collection, vandalism, and inadvertent damage. As for the site steward programs, the text in Section 3.11.6.2 was revised to include reference to these programs, but the text also notes that these programs are not always available in every part of the state and therefore may not be applicable on a project that extends for hundreds of miles. Also, many of the construction roads would be reclaimed and access restricted to operation and maintenance personnel in some areas after construction, thereby reducing the potential for access to historic properties located outside of the ROW and susceptible to looting. This also was added to the text.
National Park Service	613-785	Tables 3.14-4, 3.11-7, 3.11-10, and 3.11-14: These tables list Average Site Density, but there is no information how these numbers are derived. Please explain the process used to obtain these numbers.	The footnotes to Tables 3.11-4, 3.11-7, 3.11-10, and 3.11-14 were revised per the comment.
National Park Service	613-786	Chapters 3 and 6: There are some differences in the information presented in the two chapters - an explanatory paragraph would be useful to help the reader understand why the information in Chapters 3 and 6 sometimes differs.	The commenter has not provided sufficient information to respond to the comment. However, the document has been reviewed to improve clarity and consistency of information presented throughout the document.
National Park Service	613-787	Tribal Consultation In recent conversations with tribes about increasing tribal participation in the NEPA process, NPS has received valuable feedback on recommended practices. When contacting tribes, tribal representatives have recommended the following: <ul style="list-style-type: none"> • Ensure that any letters sent to the Tribal Council or a single tribal leader are also copied to tribal staff. • Make follow-up phone calls to ensure that the contact has been received and to answer questions. • Advertise seeping and public meetings in tribal media. • Offer opportunities for the tribes to meet singly with the agency as well as opportunities for the tribes to come together with the agency and other cooperating stakeholders 	Your suggestions have been noted for use in subsequent communications with tribes.

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Commenter Name	Comment ID	Extracted Comment	Response
National Park Service	613-788	<p>Light and Noise Impact, General: Light and noise from energy projects can often affect natural resources located many , miles from their source. As a result, protecting the acoustic environment and night sky resources in national parks often involves assessing potential impacts from projects that are not immediately adjacent to NPS properties. The TransWest Express Transmission project has the potential to affect NPS resources and values at Dinosaur NM, Lake Mead NRA and Black Canyon Wilderness area. Low levels of anthropogenic light and sound are important to many park resources and are a key component of wilderness character. Therefore, the NPS submits the following comments related to the DEIS.</p> <p>Night Skies--The nighttime environment can be important as a natural resource, a cultural resource, or both. NPS recommends that naturally dark night skies be considered as a resource with inherent value that may have a profound effect on the quality of many other resources and values such as wildlife, solitude, recreation, astronomy, cultural resources, historic resources, and overall ecosystem function. In addition, it has been identified as an Air Quality Related Value under the 1977 Clean Air Act Amendments. For these reasons, the EIS should include an analysis of lighting impacts to address current night sky conditions and potential impacts from the project. The proposed project is in a portion of the US with relatively dark night skies. For reference, Figure 1 provides modeled anthropogenic light ratio (ALR) levels for the contiguous U.S. This figure illustrates the quality of the night skies found throughout the country using false colors to enhance the differences in conditions. In general, NPS recommends that outdoor lighting on lands adjacent to NPS units use the following approaches to mitigate potential impacts from anthropogenic light. Each of the mitigation approaches can affect lighting impacts, but all attributes of lighting need to be evaluated together.</p> <p>1) Light only where it is needed2) Light only when it is needed3) Shield lights and direct them downward4) Use the minimum amount of light necessary5) Select lamps with warmer colors (less blue light)6) Select the most energy efficient lamps and fixture.</p> <p>Since specific lighting plans are not included at this stage, NPS recommends that they be included in preliminary designs for the project and that they are shared with NPS so park managers can review the potential impacts. Further, tall transmission towers may necessitate aviation anti-collision beacons. In some locations, effects from anti-collision markers have degraded the scenic quality of the night sky and the cultural landscape at night. Lights from transmission towers can also cause wildlife disorientation and mortality. Compared to daytime conditions, visibility of transmission towers often increases at night. Even when towers are difficult to see during daytime hours, at night they are often be plainly evident due to the artificial lighting. Within the guidance given by the Federal Aviation Administration, there are opportunities to mitigate tower obstruction lighting. For example, it may be possible to provide marker beacons on the ends of a series of towers, as opposed to every individual tower. Lower intensity or density lighting on the intervening towers may also be an option in lieu of the highest intensity lighting on each tower. The use of strobes or short duration flashing lighting has been shown to minimize bird disruption. Slower pulsing or constant marker lighting should be avoided.</p>	TransWest Express' POD states the Project will comply with FAA regulations regarding structure marking, which require lights for structures over 200-feet tall or at site-specific locations near airports . Because the proposed structures are not taller than 200 feet, there is no intent to light transmission structures during the operations phase of the Project. Temporary lighting during construction of the Project will also not include lights on transmission line structures.
National Park Service	613-789	Page 3.12-12, Section 3.12.5.7: Because Valley of Fire State Park (NV) is in close proximity to the alternative proposed route(s) of the transmission line it should be noted that it is also a designated National Natural Landmark (NNL). As such, the NNL definition should be added to the Glossary (see G-1, page 17), and should read as follows: "A natural area that the Secretary of the Interior has designated a National Natural Landmark".	The NNL designation will be noted in Section 3.12.5.7 and added to the glossary and list of acronyms.
National Park Service	613-790	Page 3.13-95Clark County Wetlands Park is protected by section 6(f) of the Land and Water Conservation fund (LWCF) Act and as such any impacts to recreation, whether temporary or permanent, would need prior approval by Nevada State Parks and NPS. There is no minimum threshold for impact.	Clark County reviewed the documentation for both LWCF funded projects within the wetlands park. According to the documentation, both projects occurred on the west end of the park and therefore, the project areas for both grants would not be affected by the proposed transmission line.
National Parks Conservation Association	575-1722	NPCA commends TWE for routing decisions that recognize the intention of the National Park Service Organic Act of 1916, specifically that the DEIS has avoided routes near Capitol Reef, Bryce Canyon and Zion National Parks. We do question, however, alternatives within the DEIS that would breach National Park System boundaries at Dinosaur National Monument and Lake Mead National Recreation Areas.	Comment noted. The Draft EIS includes the information about the intention of the National Park Service Organic Act of 1916 and inconsistencies with Lake Mead NRA management. Information regarding management stipulations from the Dinosaur NM General Management Plan will be incorporated into Section 3.15.3.2 of the Final EIS and analysis statements regarding management restrictions associated with the Dinosaur National Monument access road updated appropriately.
National Parks Conservation Association	575-1723	We also commend the BLM and WAPA for thorough processes, as mandated by the National Environment Policy Act (NEPA), in assembling this DEIS. We specifically note that the DEIS evaluates a broad array of potential impacts on Specially Designated Areas (SDA's), units of "land managed by federal or state agencies for the protection of specific resource values" of which national park units are included.	Thank you for your comment.

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National Parks Conservation Association	575-1724	We are, however, concerned that the public comment period was not extended as requested by several stakeholders to ensure full and adequate public participation in light of new information specific to long-term decisions regarding greater sage- grouse management, lands with wilderness character, and other resources and values.	Comment noted. The BLM determined that a 90-day comment period was sufficient for comment on the Draft EIS and declined to extend the comment period further. Please note that a 90-day comment period is double the required comment period required for EISs for site-specific projects and meets the requirements for comment periods for EISs analyzing land use plan amendments. These requirements are detailed in the Council of Environmental Quality Regulations for the Implementation of the National Environmental Policy Act (CEQ regulations), the BLM NEPA Handbook (H-1790-1), and the BLM Land Use Planning Handbook (H-1601-1).
National Parks Conservation Association	575-1725	Visual impacts alone could have an unfavorable influence on park visitation and weaken the tourism economy of local communities. We appreciate that these points have been made, specifically in sections related to Visual Resources, Recreation, and Socio-Economic Impacts.	Thank you for your comment.
National Parks Conservation Association	575-1726	The Dinosaur NM General Management Plan clearly states, "The main purpose of the corridor aside from the road right-of-way is to provide scenic protection between US 40 and Deerlodge Park. Development within the authorized easement area would diminish the visual qualities of this rangeland foreground." The plan further states that only agricultural and recreational uses, compatible with protection of scenic values, would be allowed in this special use zone and incompatible uses listed include commercial and industrial uses and uses that damage scenic resources. A high voltage transmission line crossing the National Park Service-managed corridor along Deer Lodge Road would be an incompatible use both because it is commercial and it would damage the scenic resources for every visitor entering the east end of Dinosaur NM. Of note, project access roads and staging areas would also be incompatible uses along the Deerlodge Road corridor, requiring a permit from the National Park Service, contrary to the statement in the DEIS that says "there are no known Dinosaur National Monument management restrictions associated with the Dinosaur National Monument access road."	Information regarding applicable management stipulations from the Dinosaur NM General Management Plan were incorporated into Section 3.15.3.2 of the Final EIS and analysis statements regarding management restrictions associated with the Dinosaur National Monument access road were updated appropriately. The section was clarified to explain that no ground disturbance would be anticipated on NPS property from transmission towers, access roads and staging areas; however, effects to visitors and visual resources are disclosed.
National Parks Conservation Association	575-1729	It was only after the establishment of the Tuttle Conservation Easement in August 2012, at least four years into the siting process, that alternative routes over National Park Service land and through undisturbed land was publicly proposed and considered. This change is a clear shift from previous representations and therefore we do not support the recent efforts to locate transmission siting that would impact Dinosaur NM.	Comment noted. The Tuttle Ranch design options described in the Final EIS were developed in response to new information; i.e., the executed conservation easement agreement. The Draft EIS still includes the original alignment through the Tuttle Ranch.
National Parks Conservation Association	575-1734	Lake Mead's General Management Plans allows two utility corridors through the park. These corridors support Navajo Power and the Western Area Power Administration (WAPA) and are an important link to area substations and, in turn, the western power grid. However, additional transmission corridors through the park unit should be considered contrary to the tenets of the National Park System, contrary to the enabling legislation that established Lake Mead NRA, and contrary to the natural and cultural resources the park unit is charged to protect. The NPS Organic Act requires the highest level of protection for all National Park System units. As such, alternatives outlined in the DEIS – specifically, Alternatives IV-B and IV-C and alternate variations – should be considered contrary to the intent of establishing Lake Mead NRA.	Lake Mead NRA is primarily discussed in Section 3.13 of the Draft EIS (Recreation), although Section 3.15.4.6 of the Draft EIS does acknowledge that the NPS has indicated that constructing the project would be incompatible with NRA management. An additional subsection was added to Section 3.15.3 (3.15.3.4) of the Final EIS to identify management stipulations from the Lake Mead NRA General Management Plan and the "no impairment" and "no practicable alternative" standard of the Organic Act and NPS Director's Order #53. The analysis was updated in Section 3.15.4.6 of the Final EIS to reflect this language.
National Wildlife Federation	572-1885	The 15,076-acre Tuttle Conservation Easement, executed on September 26, 2012, provides an unfragmented expanse of habitat and will improve as the area continues to recover from wildfire, including on surrounding property. CPW views this property as a keystone parcel in its effort to protect wildlife habitat on a landscape scale and as a more important and higher value habitat than that north of Highway 40. Two of Colorado's largest elk herds (E-2 and E-6) converge on these lands during average winters, numbering 7,000 to 10,000. The land is mapped as an elk concentration area. The area also is important as habitat year-round for pronghorn herds. Remaining sagebrush on the easement has become increasingly important to wintering mule deer. In addition to the presence of a year-round Greater sage-grouse leks site, the conservation easement is situated between two large Greater sage-grouse complexes and serves as an important transitional linkage between the priority habitat from Axial Basin (east) to Blue Mountain (west).	Comment noted. We appreciate your input on the value of the Tuttle Conservation Easement. Because of these outstanding wildlife resource values the lead agencies developed the Tuttle Easement Micro-siting Options, which allow for alternative transmission line routes, outside of the existing transmission line corridor, that would avoid or minimize impacts to the lands covered by this easement.
Nevada Cogeneration Associates #1	650-942	The proposed route for the transmission project crosses underground water, power and communications lines co-owned by NCA1. NCA1 requests the planning and implementation of the project take the underground facilities into account, and it would like to reserve the right to make further comments as it learns more about the proposed project.	Thank you for your comment. The BLM and Western as lead agencies will require the TransWest coordinate with the owners of any facilities/Right-of-Ways crossed by the Project. Additionally, TransWest has committed to doing that coordination. Chapters 3 and 5 of the Final EIS will be revised to discuss potential direct and indirect effects of the Project on NCA1 facilities, as well as any cumulative effects associated with the NCA1 facilities.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Nevada Cogeneration Associates #2	651-943	The proposed route crosses underground water, power and communications lines owned by NCA2 and others. NCA2 requests the planning and implementation of the Project take into account NCA2's underground facilities and formally requests copies of any existing or future engineering studies of the proposed Project route and any potential adverse impact on the NCA2 facilities. Please also provide us with prompt notice of any and all additional information relevant to the Project and the potential impact on the NCA2 facilities. Accordingly, NCA2 reserves the right to make further comments and more formal objections as it learns more about the proposed Project.	Thank you for your comment. The BLM and Western as lead agencies will require the TransWest coordinate with the owners of any facilities/Right-of-Ways crossed by the Project. Additionally, TransWest has committed to doing that coordination. Chapters 3 and 5 of the Final EIS will be revised to discuss potential direct and indirect effects of the Project on NCA2 facilities, as well as any cumulative effects associated with the NCA2 facilities.
Nevada Department of Wildlife	725-1917	From our review, we can appreciate the complexity of the TWE project and the great amount of effort taken in coordinating preparation of the Draft EIS.	Thank you for your comment.
Nevada Department of Wildlife	725-1919	All alternatives traverse through predicted habitat and designated critical habitats for the Mojave Desert tortoise (<i>Gopherus agassizii</i>) (Nussear et al 2009; USFWS 2011) as illustrated in Figure 1. (confirm data)	Comment noted. No change to document text
Nevada Department of Wildlife	725-1920	It is unclear as to what measurable degree the proposed TWE contributes to influences of wildland fire.	A separate section on wildfire was added to the Final EIS as Section 3-21. Additional detail on wildland fire effects was added to the Final EIS as appropriate to wildlife, visual, public health and safety, and cumulative impacts. A fire protection plan will be developed as part of TransWest's Construction, Operation, and Maintenance Plan. As appropriate, specific requirements of the fire protection plan were outlined as mitigation in the wildfire section. See Appendix D, part 1 and 2 of the Final EIS for TWE's committed environmental mitigation measures related to fire protection (No-64).
Nevada Department of Wildlife	725-1921	retaining uninterrupted access of wildlife to existing and maintained natural and artificial water developments is expected. For example, within each of the alternatives analyzed at least two wildlife water developments are included within the 2-mile wide corridors (Figure 2).	Although TWE does not anticipate blocking access to (or removing) existing wildlife water developments additional mitigation has been developed and included in the FEIS to ensure wildlife access to artificial water developments.
Nevada Department of Wildlife	725-1922	It is unclear as to what measurable degree the proposed TWE contributes to cumulative effects on biological resources mindful of other existing and future regional projects (e.g. BLM's Las Vegas RMP Revision; Southwest Intertie Project; Toquop Energy Project; 2010 ROD for the Lincoln County Land Act Groundwater Development and Utility Right-of-Way Project; SNW A Groundwater Project; Zephyr Transmission Project; Dry Lake Solar Energy Zone; NV Energy Centennial II Transmission; Southern Nevada Supplemental Airport; Silver State Solar South Project; I-II Boulder City Bypass; I-II Las Vegas Northward segment;). In view of past economic growth and development of utility and transportation infrastructure in southern Nevada, and recently emerging climate patterns, NDOW anticipates added stressors to wildlife populations, habitats, and landscape scale ecosystem function. As a means for avoiding and minimizing overall disturbances to wildlife resources associated with construction and operation of the proposed TWE Project, consideration of adopting the corridor illustrated in enclosed Figure 3 is recommended. Because existing corridors were used in identifying all alternatives, NDOW's preferred corridor (blue) in Figure 3 is a combination of the Agency Preferred IIIB and Applicant Proposed alternatives. Alternatives segments (amber) to NDOW's preferred corridor are also provided as a means to further consider routing constraints for compelling purposes not readily apparent in the DEIS, but hopefully taken up in discussion as needed during development of the Final EIS.	In their selection of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. The cumulative effects of many of the projects you note have been considered in Chapter 5 of the Draft EIS. Those not included in the Draft EIS analysis have been reviewed and if they met the criteria for past, present, or reasonably foreseeable future actions affecting the same resources as the TransWest Express Project, their impacts were disclosed in appropriate sections in Chapter 5 of the Final EIS.
Nevada Department of Wildlife	725-1923	Regarding ground electrode system alternatives, seriously exploring the feasibility of locating the southern site within the bounds of the Dry Lake Solar Energy Zone is suggested.	The applicant's Project Description Technical Report (PDTR, Appendix D to the EIS) describes the criteria used for siting the ground electrode systems. This information can be found in the PDTR Section 4.3.2, where it indicates that the system must be located away from grounded metallic infrastructure, which would include solar installations. Therefore, the Solar Energy Zone is incompatible with the ground electrode system.

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Commenter Name	Comment ID	Extracted Comment	Response
Nevada Department of Wildlife	725-1924	Building on the best management practices (BMPs) and mitigation described for biological resources in the body of the DEIS and Appendix C for TWE construction and operation, a more firm commitment to transmission structure design features or other methods was anticipated. We noted in the DEIS's Appendix C that all transmission structures would be raptor safe following guidelines in Suggested Practice for Raptor Protection on Power Lines (Avian Power Line Interaction Committee [APLIC] 2006, 1996; APLIC and U.S. Fish & Wildlife Service 2005); however, measures for ensuring distribution structure designs must not provide subsidy perching or nesting areas for avian predators, e.g. raptors and corvids (Prather & Messmer 2010). Other transmission and energy generation projects in this geographic region incorporated design features and/or adopted avian management plans for monitoring and implementing measures addressing the increased avian predation potential associated with energy transmission structures. The Eldorado-Ivanpah Transmission Project, Moapa Solar Energy Center, and Southwestern Intertie Project are examples by name. Another example is a transmission system near Beaver Dam, Utah having tubular steel design with the tops capped with cones to discourage perching. NDOW has been consistent in requesting tubular steel designs with perch deterrents on all horizontal surfaces as the BMP for the TWE in Nevada. Perching and nesting deterrents are cogent to the conservation of ESA-listed species and wildlife of conservation priority. We have further recommended that if steel lattice remains the engineering choice, then raptor and raven management plans must be devised and diligently implemented for nesting and perching circumvention. Again, NDOW urges these measures be addressed.	Comment noted. Alternative structure designs, perch discouragers, development of an avian protection plan, and a raven management plan have all been added to the list of proposed mitigation for the FEIS.
Nevada Department of Wildlife	725-1925	Section 3.7.1 Regulatory Background, Table 3.7-1: There are no hyphens in the annotation of Nevada Revised Statutes (NRSs) and Nevada Administrative Codes (NACs). For Big Game, Nevada laws and regulations include NRS 501.005, NAC 502.020, and NAC 503.020. For Small Game, NACs 503.020, 503.025, and 503.045 would apply. For Nongame, see NACs 503.030, 503.035, 503.050, and 503.080.	Table 3.7-1 has been modified to address comment.
Nevada Department of Wildlife	725-1926	Section 3.7.1 Regulatory Background, Table 3.7-1: NAC 503.075 applies to amphibians and belongs in DEIS sections 3.9 and 3.10.	This code will be removed from Section 3.7 and added to Sections 3.9 and 3.10.
Nevada Department of Wildlife	725-1927	Page 3.7-7, Furbearers: Additional to the species identified both gray fox (<i>Urocyon cinereoargenteus</i>) and kit fox (<i>Vulpes velox</i> ; formally <i>V. macrotis</i>) are located within the wildlife analysis area and classified as fur-bearing mammals in Nevada (NAC 503.025).	Text in Section 3.7 has been modified to address comment.
Nevada Department of Wildlife	725-1928	Pages 3.7-8 to ... , Section 3.7.4.3 Nongame Species (and other applicable DEIS sections): Relevant to avian species, a resource helpful in developing this chapter would be the Nevada Comprehensive Bird Conservation Plan by the Great Basin Bird Observatory (GBBO 2010). This source goes the scope of the Important Bird Areas in Nevada by providing key habitat use and conservation and population profiles and maps for birds of conservation concern. Reviewing the Nevada Comprehensive Bird Conservation Plan for applicable bird species of conservation concern can be facilitated by going online to www.gbbo.org/bird-conservation-plan.html .	Text in Sections 3.7 and 3.8 has been modified to include suggested reference.
Nevada Department of Wildlife	725-1929	Pages 3.7-8 to ... , Section 3.7.4.3 Nongame Species (and other applicable DEIS sections): The 2005 Nevada Wildlife Action Plan (NW AP) was revised to include considerations for climate change. Noting the Species of Conservation Priority identified within the Plan may prove useful to this EIS effort. A 2012 public review version was posted on NDOW's website and is cited in the DEIS. Since then, the 2012 public review version received final edits and was subsequently approved by the USFWS in March 2013. NDOW's website also was revamped and the approved NWAP is now online at: http://www.ndow.org/Nevada-Wildlife/Conservation/Nevada-Wildlife-Action-Plan/ .	Comment noted. Special Status Species carried forward in the FEIS analysis are those that receive statutory protection under ESA, BLM, USFS, and state law. No change to text.
Nevada Department of Wildlife	725-1930	Page 3.7-8 Section 3.7.4.3 Nongame Species 2nd to last paragraph: Nesting and perching deterrents on transmission structures are as germane to potential for predation impacts to migratory birds as to special status species like the desert tortoise and greater sage-grouse. Measures to avoid or minimize subsidy of structures and other appurtenances as nesting and perching sites is requested.	Species specific mitigation measures are included in the text of Sections 3.7/3.8 and in Table C-5-1 of Appendix C. No change to text.
Nevada Department of Wildlife	725-1931	Page 3.7-8 Section 3.7.4.3 Nongame Species Bottom paragraph: Turkey vulture, rough-legged hawk, and merlin are also good examples of species in the analysis area.	Comment noted.

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Commenter Name	Comment ID	Extracted Comment	Response
Nevada Department of Wildlife	725-1932	Page 3.7-11, Reptiles: Observation: Not unlike descriptions for small mammals, this section is extremely weak in providing insights to the accuracy and relevance of ecological diversity and biomass reptile resources represent. Notwithstanding the potential species identified in the paragraph and special status wildlife found in Section 3.8 (e.g. Table 3.8-6), reptiles occurring or potentially occurring in the DEIS's Region III and I would include: side-blotched lizard (<i>Uta stansburiana</i>), yellow-backed spiny lizard (<i>Sceloporus uniformis</i>), western fence lizard (<i>Sceloporus occidentalis</i>), long-tailed brush lizard (<i>Urosaurus graciosis</i>), ornatetree lizard (<i>Urosaurus ornatus</i>); tiger whiptail (<i>Aspidoscelis tigris</i>), common kingsnake (<i>Lampropeltis getula</i>), spotted leaf-nose snake (<i>Phyllorhynchus decurtatus</i>), western ground snake (<i>Sonora semiannulata</i>), long nose snake (<i>Rhinocheilus lecontei</i>), desert night snake (<i>Hypsiglena chlorophaea</i>), western patch-nose snake (<i>Salvadora hexalepis</i>), western rattlesnake (<i>Crotalus oreganus</i>), and Great Basin gopher snake (<i>Pituophis catenifer deserticola</i>).	Text in Section 3.7 has been modified to address comment.
Nevada Department of Wildlife	725-1933	Page 3.7-11, Reptiles: End of 3'd line: Replace semi-colon following "desert horned lizard" to a comma.	Text in Section 3.7 has been modified to address comment.
Nevada Department of Wildlife	725-1934	Page 3.7-17, Region III: Desert bighorn sheep habitat is traversed by all alternatives within Lincoln and Clark counties in Nevada.	Text has been modified to address comment.
Nevada Department of Wildlife	725-1935	Page 3.7-23, Proposed Alternative Southern Terminal (Marketplace Hub) Small Mammals: Life Zone habitats at the Marketplace Hub southern terminus (Lower Sonoran) are not similar to habitats (Upper Sonoran) where the desert shrew (<i>Notiosorex crawfordi</i>) has been described. Merriam's kangaroo rat (<i>Dipodomys merriami</i>) and desert pocket mouse (<i>Chaetodipus pencillatus</i>) are more likely rodent candidates for frequenting the locale.	Text in Section 3.7 has been modified to address comment.
Nevada Department of Wildlife	725-1936	Page 3.7-23, Proposed Alternative Southern Terminal (Marketplace Hub) Reptiles: The western rattlesnake does not occur in the Marketplace Hub vicinity. The sidewinder should be the most commonly encountered <i>Crotalus</i> with the southwestern speckled and Mohave rattlesnakes also present.	Text in Section 3.7 has been modified to address comment.
Nevada Department of Wildlife	725-1937	Page 3.7-31, Raptors (Region III): Great homed owl, Cooper's hawk, and American kestrel should be included. All of the aforementioned have been observed within vicinity of the TWE alternatives. For verification needs, associated spatial data are available; and, although NDOW's database is periodically updated, our field biologists would have the most current knowledge. Contacting NDOW's Southern Region point of contact for arranging discussion to this end is encouraged.	The three referenced species have been added to the list of non-special status raptors known to nest in Region III.
Nevada Department of Wildlife	725-1938	Page 3.7-31, Raptors (Region III): Could not find section 3.5.4.5 in the DEIS; please check.	The referenced text in Section 3.7 has been corrected in response to this comment.
Nevada Department of Wildlife	725-1939	Page 3.7-41, Southern Terminal Habitat Disturbance and Fragmentation, 2nd paragraph, End of 2nd line: Lacking a definition in the DEIS of what constitutes typical wildlife habitat, replacing the word "typical" with "sustainable" or "long-term viability" may be more clear.	Relevant text in Sections 3.7, 3.8, and Appendix G has been modified to address comment.
Nevada Department of Wildlife	725-1940	Page 3.7-41, Southern Terminal Habitat Disturbance and Fragmentation, 2'd paragraph, 4th line: Neither the greater short-homed lizard (<i>Phrynosoma hernandesi</i>) nor bushy-tailed woodrat (<i>Neotoma cinerea</i>) occur in desert shrubland typified by creosotebush communities. However, the desert homed lizard (<i>P. platyrhinos</i>) and desert woodrat (<i>N lepida</i>) are more likely represented.	Text in Section 3.7 has been modified to address comment.
Nevada Department of Wildlife	725-1941	Page 3.7-42, Southern Terminal and Alternate Southern Terminal: In view of previous comments, re-visiting the accuracy of the statements made is suggested.	Text in Section 3.7 has been modified to address comment.
Nevada Department of Wildlife	725-1942	Pages 3.7-99 to 3.7-107: Section 3.7.6.6 Region IV (and other relevant impact discussion sections): The alternatives considered should also account for the ecological value of places like the dry lake in northern Eldorado Valley; it is not always dry. When heavy precipitation, such as from summer thunderstorm events collects into the playa, tadpole shrimp (<i>Triops</i> sp.) emerge in large numbers to complete life-cycle reproduction. Other arthropods, including a number of aquatic and pollinating insects also emerge or are drawn to the area to make the most of the ephemeral lake conditions. Along with vegetation responses, a variety of volant and terrestrial wildlife make use of foraging and drinking opportunities. The importance of desert playas and ephemeral pools as key habitat is discussed in the 2012 Nevada Wildlife Action Plan (e.g. pages 288-296).	State wildlife action plans are referenced in multiple section throughout the EIS (3.7 Wildlife, 3.9 Aquatic Wildlife). Thank you for your comment.
Nevada Department of Wildlife	725-1944	Pages 3.7-99 to 3.7-107: Section 3.7.6.6 Region IV (and other relevant impact discussion sections): Decision as to which corridor(s) is selected in Region IV for reaching the southern terminal at Marketplace Hub should include consideration of indirect and cumulative effects of the TWE to the Eldorado Valley playa in relation to contributing effects by other energy generation/transmission and transportation developments.	The direct, indirect, and cumulative effects of the TWE Project on the energy generation/transmission and transportation developments in the Eldorado Valley were considered in the evaluation of the alternative corridors in Region IV. They will also be considered by the lead agencies in making their final decision on which alternative will be implemented. The rationale for that decision will be provided in the Record of Decision for all pertinent federal agencies. Section 5.3.14 of the Final EIS was revised to disclose those potential impacts.
Nevada Department of Wildlife	725-1945	Page 3.8-1, Section 3.8 Special Status Wildlife Species 3.8.1 Regulator Background, 5th line: NAC 501.100 should be replaced with NAC 503.0001 so the regulation grouping is "(NAC 503.0001 - 503.1 04)."	Text in Section 3.8 has been modified to address comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Nevada Department of Wildlife	725-1946	Page 3.8-1, Section 3.8 Special Status Wildlife Species Table 3.8-1: See above bullet comment for correcting mislabeled NACs. Also, Nevada Revised Statute (NRS)503.597 and NAC 503.093 should be added.	Text in Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1947	Page 3.8-8, Table 3.8.6-Species Potentially Occurring in the Special Status Wildlife Analysis Area: Because DEIS definition of special status species includes those having protections afforded by the states, the Status column needs to be updated for State of Nevada protected wildlife classified in Chapter 503 of the Nevada Administrative Codes (503.0001-503.104). Please consult the following link, http://www.leg.state.nv.us/NAC/NA-503.html#NAC503Sec030 , and make appropriate changes to the Table.	Text in Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1948	Page 3.8-8, Table 3.8.6-Species Potentially Occurring in the Special Status Wildlife Analysis Area: Another observation is distinguishing migratory birds protected under the Migratory Bird Treaty Act (MBT A), and de facto also protected by the states, poses a challenge in the DEIS analysis relevant to those species potentially qualifying as Special Status Species. Citation of DEIS sections where the distinctions are drawn would be helpful. The final 2012 Nevada Wildlife Action Plan and those for the other states might assist to that end.	Text in Table 3.8-6 has been modified to address comment. A footnote has been added to explain which sections address migratory birds.
Nevada Department of Wildlife	725-1949	Page 3.8-14/15 Yuma Clapper Rail The listing includes populations in Nevada. Records exist for the species along the Muddy and Virgin Rivers, and Ash Meadows National Wildlife Refuge. The Yuma clapper rail is also suspected to occur at Pahrnagat National Wildlife Refuge and Las Vegas Wash (GBBO 2010).	Text in Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1950	Page 3.8-17 Yellow-billed Cuckoo In addition to Meadow Valley Wash, this species has been documented along the lower Virgin River, Pahrnagat Valley, and Las Vegas Wash (GBBO 2010, NDOW staff2013).	Text in Appendix G and Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1951	Page 3.8-17 Yellow-billed Cuckoo On October 3, 2013, the western Distinct Population Segment of the species was proposed to be ESA listed as threatened by the USFWS and would seem relevant for all states the TWE traverses.	Text in Appendix G and Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1952	Page 3.8-17/18 Southwestern Willow Flycatcher The southwestern willow flycatcher is also found in Pahrnagat Valley and Ash Meadows National Wildlife Refuge (GBBO 2010).	Appendix G and Section 3.8 have been modified to address comment. GBBO 2010 has been added as a reference.
Nevada Department of Wildlife	725-1953	Page 3.8-21, Section 3.8.4.2 BLM Sensitive, USFS Sensitive, USFS MIS, and State-Protected Wildlife Species, last line: Appendix G descriptions should be updated to correspond with adjustments of species within the analysis area.	Appendix G has been updated to reflect species with potential to occur in the FEIS analysis area.
Nevada Department of Wildlife	725-1954	Page 3.8-23, Table 3.8-9 Special Status Species Potentially Occurring at the Proposed Alternative Southern Terminal, and Section 3.8.5.3: The Proposed Southern Terminal, Alternate Southern Terminal, and Region IV occur well outside the geographic range for the pale kangaroo mouse, <i>Microdipodops pallidus</i> , and dark kangaroo mouse, <i>M. megacephalus</i> (Hafner et al/2008; Hafner and Upham 2011).	Text has been modified to address comment.
Nevada Department of Wildlife	725-1955	Page 3.8-23, Table 3.8-9 Special Status Species Potentially Occurring at the Proposed Alternative Southern Terminal, and Section 3.8.5.3: Although expected to occur in the area, the kit fox is not a BLM-Nevada special status species and classified as a fur-bearing mammal by the State of Nevada and protected by virtue of NAC regulations governing take thereof.	Text has been modified to address comment.
Nevada Department of Wildlife	725-1956	Page 3.8-23, Table 3.8-9 Special Status Species Potentially Occurring at the Proposed Alternative Southern Terminal, and Section 3.8.5.3: The habitat does not correspond with the type associated with gray vireo use; hence it is not expected to occur in this locale and be struck from the list.	Text modified to address comment.
Nevada Department of Wildlife	725-1957	Page 3.8-23, Table 3.8-9 Special Status Species Potentially Occurring at the Proposed Alternative Southern Terminal, and Section 3.8.5.3: The desert iguana, Mojave rattlesnake, speckled rattlesnake, zebra-tailed lizard, desert night lizard, western banded gecko, long-nosed leopard lizard, and western thread snake are not BLM-Nevada special status species nor State of Nevada protected species and should be struck from the list.	Text has been modified to address comment.
Nevada Department of Wildlife	725-1958	Page 3.8-23, Table 3.8-9 Special Status Species Potentially Occurring at the Proposed Alternative Southern Terminal, and Section 3.8.5.3: Although protected under the MBTA and NAC 503.050, the long-eared owl is not a BLM-Nevada special status species nor does it have heightened conservation priority by the State of Nevada.	Text has been modified to address comment.
Nevada Department of Wildlife	725-1959	Page 3.8-23, Table 3.8-9 Special Status Species Potentially Occurring at the Proposed Alternative Southern Terminal, and Section 3.8.5.3: The loggerhead shrike and Brewer's sparrow are BLM-Nevada special status species and State of Nevada sensitive species (NAC503.050.3); perhaps the both should be in the table.	Text modified to address comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Nevada Department of Wildlife	725-1960	Page 3.8-23, Table 3.8-9 Special Status Species Potentially Occurring at the Proposed Alternative Southern Terminal, and Section 3.8.5.3: Check spelling of Mojave (sic) shovel-nosed snake.	Text has been modified to address comment.
Nevada Department of Wildlife	725-1961	Page 3.8-33, Table 3.8-14 Special Status Wildlife Species Potentially Occurring in Region IV: - Region IV occurs well outside the geographic range for the pale kangaroo mouse, Microdipodops pal/idus, and dark kangaroo mouse, M megacephalus (Hafner et al/2008; Hafner and Upham 2011). - Although expected to occur in the area, the kit fox is not a ELM-Nevada special status species and is classified as a fur-bearing mammal by the State of Nevada (NAC 503.025), protected by virtue of NAC regulations governing take thereof.	Text in Appendix G and Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1962	Pages 3.8-45 through 3.8-47, Table 3.8-18: It is unclear why several species are listed in this table as their geographic distributions are well outside the Option 2 Southern Terminal near the IPP (see Figure 2-2). Rigor into discriminating species found in each of the alternatives would enhance TWE EIS integrity.	Text in Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1963	Page 3.9-1, Section 3.9.1 Regulatory Background, Table 3.9-1 Relevant Regulations for Aquatic Species: All regulation entries for the State of Nevada are inaccurate with some appearing creatively named. Suggested Table entries are provided below: (see original letter Page 6 for table changes)	The Nevada regulations in Section 3.9.1, Table 3.9-1 were revised.
Nevada Department of Wildlife	725-1964	Page 3.9-9, Section 3.9.6.1, Southern Terminal, 1st paragraph, 2"d line: The City of Boulder in Clark County, Nevada is referred to as Boulder City.	The City of Boulder City, Nevada provided public comment on the DEIS, but did not comment on how the City was referred to; therefore, no specific changes have been made to the FEIS.
Nevada Department of Wildlife	725-1965	Page 3.10-1, Section 3.1 0.1 Regulatory Background, Table 3.10-1: Please note the following: Nevada Revised Statutes 501.100,501.110,501.375-501.395; Chapter 502; NRSs 503.090,503.270-503.430, and 503.584-503.650 Nevada Administrative Codes 503.065, 503.067, 503.075, 503.090-503.10	The suggested revisions were made to the Nevada regulations in Section 3.10.1, Table 3.10-1.
Nevada Department of Wildlife	725-1966	Page 3.10-2, Table 3.10-2, Status column: Entries do not make consistent use of NV-P as defined in the Status key, i.e. NV was used twice.	The status entries in Table 3.10-2 in Section 3.10.1 were revised to only use the abbreviation NV-P for Nevada State Protected species.
Nevada Department of Wildlife	725-1967	Page A-7, Appendix A, Biological Resources Agency column for 3rd and 4th rows should read "Department of Wildlife"	Text has been modified to address comment.
Nevada Department of Wildlife	725-1968	Pages C-17 & C-18, Table C.2-1 Applicant Committed Design Features, TWE-29, TWE-33, & TWE-34: The Department's Gila monster protocol provides measures and guidelines to identify, report, monitor, avoid impacts and provide spatial information relative to this State Protected animal (NAC 503.080). Inclusion of the protocol as part of BMPs for the project is requested. The protocol is available online at: www.ndow.org/uploadedFiles/ndoworg/Content/public documents/Nevada Wildlife/Gila %20Monster% 20Status,%20Identification%20and%20Reporting%20Protocol%20for%20Observations.pdf .	Thank you for your comment. BMPs identified in the referenced protocol have been included as additional mitigation measure SSWS-12 in Section 3.8.6 of the FEIS.
Nevada Department of Wildlife	725-1969	Page C-125, Appendix C, Table C.S-1 Mitigation Measures, SSWS-2: Ulmschneider et al/ 2004 and Keinath and McGee 2004 are cited but their references are not found in the DEIS's Glossary and References section for Appendix C.	Section C.5 (Additional Mitigation Measures prescribed for the TWE Project) is a compilation of proposed mitigation measures identified in earlier sections of the Draft EIS (resource analysis sections 3.2 through 3.20). As such, the full references for Ulmschneider et al. 2004 and Keinath and McGee 2004 are included in the Reference section under Section 3.8 – Special Status Wildlife Species.
Nevada Department of Wildlife	725-1970	Page C-126, Appendix C, Table C.S-1 Mitigation Measures SSWS-4: Inkeeping with NRS 503.597and NAC 503.093, a Special Purpose Permit (SPP) is required from NDOW should any tortoises be encountered during the course of project construction and operation where there is need to move animals out of out of harm's way or translocated. The SPP must be obtained in advance of any project groundbreaking activities. Application and instructions can be found online at www.ndow.org/Fon11S and Resources/Special Permits/.	The applicant has committed to complying with all applicable environmental laws and regulations as stated in Design Features TWE-1, TWE-2, and TWE-31 as listed in section 3.8.6 and Appendix C. This includes the application for a NDOW Special Purpose Permit (SPP) for activities within occupied desert tortoise habitat.
Nevada Department of Wildlife	725-1971	Page C-126, Appendix C, Table C.S-1 Mitigation Measures SSWS-5 and SSWS-7: Adopting structure designs from those recommended for sage-grouse and Utah prairie dog are appropriate for all alternatives in Nevada; e.g. self-supporting tubular steel monopole or H-frame and nesting/perching deterrents/discouragers for limiting/minimizing structure use by raptors and ravens.	Thank you for your comment. The use of alternative structure designs has been added to mitigation measure SSWS-4 for desert tortoise.
Nevada Department of Wildlife	725-1972	Page C-130, Appendix C, Table C.S-1 Mitigation Measures: LU-1: Depending on the potential for species affected, NDOW would look to the opportunity to participate in coordinating discussion regarding placement of project elements with wildlife compatibility. This especially pertains to the Meadow Valley Wash/Muddy River portions of Region III, and Region IV.	The comment is noted. LU-1 has been augmented to indicate that the proponent shall coordinate with land managers and agencies with jurisdictional authority on final structure placement.
Nevada Department of Wildlife	725-1973	Page C-130, Appendix C, Table C.S-1 Mitigation Measures Range-2: NDOW looks forward to more direct coordination opportunities initiated by the land managers and applicant relative to TWE placements and project access relative to wildlife water developments	Comment noted. Proposed mitigation measure WLF-3 requires the applicant to coordinate artificial wildlife water development avoidance and/or replacement with applicable state wildlife agencies. No change to text.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Nevada Department of Wildlife	725-1975	Glossary Section and Appendix G: Pagination method is identical, possibly leading to cross-referencing confusion within the Table of Contents?	The page numbering of the glossary will be adjusted to be unique.
Nevada Department of Wildlife	725-1976	Appendix G, Table G-2 Special Status Wildlife Species Identified for the TransWest Express Transmission Project Page G-40, Banded Gila monster and Mojave shovel-nosed snake: While both species are Species of Conservation Priority identified in Nevada's approved 2012 Wildlife Action Plan, the Mojave shovel-nosed snake is not classified as protected (see NAC 503.080).	Text has been modified in Appendix G to address comment.
Nevada Department of Wildlife	725-1977	Appendix G, Table G-2 Special Status Wildlife Species Identified for the TransWest Express Transmission Project Page G-41: Desert Tortoise: Should the purpose of the Table's Status column be, in part, indicating a sense of how sensitive or vulnerable a special status species is viewed by the State of Nevada, adding descriptions of endangered, threatened, or sensitive is recommended (i.e. NV-E, NV-T, and NV-S, respectively) in keeping with NAC wildlife classifications. For the Desert Tortoise, the Status column entry would be NV-T (see NAC 503.080).	Text in Appendix G and Section 3.8 has been modified to address comment.
Nevada Department of Wildlife	725-1978	Appendix G, Table G-2 Special Status Wildlife Species Identified for the TransWest Express Transmission Project Pages G-42 to G-50: With exception to the three gallinaceous species, all birds identified are State of Nevada protected species per Nevada Administrative Code 503.050 (i.e. acknowledging the Migratory Bird Treaty Act, as amended, and Bald Eagle Protection Act, as amended). Should additional description of how vulnerable or sensitive a species is, then the NV-E, NV-T, or NV-S method is recommended for corresponding annotations in NAC 503.050.	Text in Appendix G and Section 3.8 has been modified to address this comment.
Nevada Department of Wildlife	725-1979	Pages G-60 and G-62, Table G-3, Status of Utah Chub as NV-LD: The species is not included in the 2012 Nevada Wildlife Action Plan as a species of conservation priority.	Utah chub was deleted from Appendix G, Table G-3.
Nevada Department of Wildlife	725-1980	Page 3-22, Small Game, Region III: Small game species are also typically found around natural and developed springs, seeps with several habitats enhanced with wildlife water developments.	Text in Section 3.7 has been modified to address this comment.
Newby, Ken	438-659	guess the other question is, if this is accessible to the public, as far as just driving four-wheelers down this area, that they are going to use for kind of a roadway to get in for maintenance or whatever, are they going to have gates to lock it? I know in some power lines they have put in out here just west of us going towards Las Vegas, they have made these big towers for electrical, or for propane underground, and they've got a 24-foot wide or so up through the whole line. So, it's easy accessible. And they have placed big boulders in certain areas to keep people from using it as a easy drive-through. They make it almost impossible to drive the full length of that. And there are people that like to do those kind of things with four-wheelers, because we get a lot of four-wheeler activity out here. And most of them carry firearms. They like to shoot at things. So, you know, shooting at your towers would be no exception to some.	The Road Analysis Plan approval process at the local, state and federal levels will address off-highway vehicle (OHV) access issues and will establish accessibility requirements.
PacifiCorp	162-156	The comments provided below demonstrate that the TWE DEIS does not adequately identify impacts of the proposed action because substantial changes in the design and location of the proposed transmission line are required to address the concerns raised. Those changes will result in significant effects outside the range of effects analyzed in the TWE DEIS. Since the environmental impacts of those substantial changes have not been fully evaluated in the TWE DEIS supplementation and republication of the TWE DEIS is required prior to the completion of a Final EIS for the project.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative Project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to the final layout of transmission lines currently under construction (such as Energy Gateway West), as well as allowing for changes associated with on-going colocation needs between TWE and the Energy Gateway South projects. The need for all transmission line projects (including Energy Gateway South) to efficiently plan in a way that will support future sitings is addressed by the WVEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". An analysis of the impacts of multiple future transmission lines being placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
PacifiCorp	162-159	<p>The Gateway West project federal permitting process was initiated in 2007 and is scheduled to receive a Record of Decision and Right of Way Grant on September 27, 2013. The BLM's current schedule for Gateway South indicates that the DEIS will be released to the public in February 2014. Although both projects have made significant progress in the NEPA permitting process, the TWE DEIS does not adequately account for the co-location of Gateway West and Gateway South within the same corridor nor does it provide sufficient data for comment. Additionally, the corridor approach in the TWE DEIS does not accommodate the analysis completed by the BLM for those projects. For this reason, Rocky Mountain Power submits that the TWE DEIS is inadequate with respect to this issue and must be supplemented to the extent necessary to provide the separation between transmission lines as outlined above.</p>	<p>The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. Based on identified resource concerns, TWE has determined that colocation with a minimum of 250' separation criteria is sufficient to ensure compliance with NERC and WECC reliability standards. This assertion has been validated in a 2012 WECC Reliability Subcommittee review of PacifiCorp's concern regarding revisions to the Adjacent Transmission Circuits definition. To address resource concerns and minimize disturbance, TWE has committed to a 250' separation from existing lines (which could include the Energy Gateway West project). Additionally, TWE and PacifiCorp have committed to coordinating in collocating the TWE and proposed Energy Gateway South projects to the extent possible. This on-going colocation exercise, combined with the new narrowed separation requirements, has made existing jointly engineered alignments largely moot. Additionally, the TWE EIS recognizes that the Energy Gateway West project is likely to begin construction before TWE. The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to the final layout of the Energy Gateway West transmission line, as well as allowing for changes associated with the on-going colocation exercise. The need for all transmission line projects (including Energy Gateway South) to efficiently plan in a way that will support future sitings is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". Appendix D includes the revised Transmission Line colocation Framework, which provides additional information on the colocation of the Project within corridors with existing transmission lines. The TWE construction POD will include the transmission line site-specific alignment and will incorporate the Energy Gateway West project alignment into the TWE design. An analysis of the ability for multiple future transmission lines to be placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.</p>
PacifiCorp	162-160	<p>Specifically, Rocky Mountain Power opposes the approach in the TWE DEIS of analyzing a two mile wide corridor without identification of a 250 foot wide right of way and reference centerline. This may result in conflicting right of way grants that preclude the construction, operation and maintenance of all or part of the Gateway West, Gateway South and TWE transmission projects. The specific concern is how each of the projects' respective 250 foot easement is to be co-located within the shared two mile wide corridor. Rocky Mountain Power takes exception to the programmatic approach being used to identify and analyze impacts for the TWE project and believes subsequent site specific NEPA compliance will be required. The agency preferred reference centerline for TWE must be included in the TWE DEIS for review and comment in order to assure that 1) the TWE project is located outside of the Gateway West right of way grant; 2) the TWE project is coordinated with and located outside of the agency preliminary preferred alternative for Gateway South; 3) minimum separation distance of 1,500 feet is maintained between all extra high voltage lines wherever possible; and, 4) line crossings are minimized between projects in support of system reliability.</p>	<p>The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. Based on identified resource concerns, TWE has determined that colocation with a minimum of 250' separation criteria is sufficient to ensure compliance with NERC and WECC reliability standards. This assertion has been validated in a 2012 WECC Reliability Subcommittee review of PacifiCorp's concern regarding revisions to the Adjacent Transmission Circuits definition. To address resource concerns and minimize disturbance, TWE has committed to a 250' separation from existing lines (which could include the Energy Gateway West project). Additionally, TWE and PacifiCorp have committed to coordinating in collocating the TWE and proposed Energy Gateway South projects to the extent possible. This on-going colocation exercise, combined with the new narrowed separation requirements, has made existing jointly engineered alignments largely moot. Additionally, the TWE EIS recognizes that the Energy Gateway West project is likely to begin construction before TWE. The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to the final layout of the Energy Gateway West transmission line, as well as allowing for changes associated with the on-going colocation exercise. The need for all transmission line projects (including Energy Gateway South) to efficiently plan in a way that will support future sitings is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". Appendix D includes the revised Transmission Line colocation Framework, which provides additional information on the colocation of the Project within corridors with existing transmission lines. The TWE construction POD will include the transmission line site-specific alignment and will incorporate the Energy Gateway West project alignment into the TWE design. An analysis of the ability for multiple future transmission lines to be placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.</p>

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
PacifiCorp	162-161	The BLM requested that Rocky Mountain Power and TWE coordinate engineering efforts through Wyoming along the I-80 corridor to co-locate the TWE, Gateway West and Gateway South projects. In response to the BLMs request, TWE and RMP initiated a formal coordination effort. In March 2012, TWE and RMP submitted a jointly engineered alignment for each project to the BLM (Attachment C). However, the TWE DEIS does not acknowledge the jointly developed alignment submitted by the proponents as a result of this effort. In a letter dated July 13, 2012 from Dennis Carpenter, the BLM Rawlins Office Field Manager (also included in Attachment C), the BLM indicated there were no specific concerns with the location of the jointly developed routes within the alternatives represented at that time, adding that the routes should go forward for analysis. Rocky Mountain Power requests that the BLM acknowledge these jointly engineered alignments and provide supplemental information to the TWE DEIS to reflect the 250 foot right of way corridors developed for each respective project.	The jointly-developed alignments that are referenced fall within the analyzed corridors of the Draft EIS. Additionally, the Final EIS includes refinements to these alternative corridors, as well as shifts in TransWest's preliminary engineered alignment to reflect the on-going coordination to date, as well as identified sensitive resource constraints.
PacifiCorp	162-162	The TWE DEIS does not include a 250 foot wide right of way and engineered centerline; however, the BLM has posted shapefiles of the agency preferred alternative reference centerline at: www.blm.gov/wy/st/en/info/NEPA/documents/hdd/transwest.html . The agency preferred alternative reference centerline in the posting introduces multiple facility conflicts and line crossings with the Gateway West and Gateway South projects which adversely impact reliability and also precludes the construction and long-term maintenance and operations for each of the projects. Due to these issues, the agency preferred alternative reference centerline for TWE posted on the BLM website does not adequately address the needs of all the projects and is therefore, unacceptable. As stated above, Rocky Mountain Power again requests the BLM 1) acknowledge the jointly engineered alignments; and, 2) provide supplemental information to the TWE DEIS to reflect the 250 foot right of way corridors developed for each respective project in order to minimize these adverse impacts.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. To address resource concerns and minimize disturbance, TWE has committed to a minimum 250' separation from existing lines (which could include the Energy Gateway West project). Additionally, TWE and PacifiCorp have committed to coordinating in collocating the TWE and proposed Energy Gateway South projects to the extent possible. This on-going colocation exercise, combined with the new narrowed separation requirements, has made existing jointly engineered alignments largely moot. Additionally, the TWE EIS recognizes that the Energy Gateway West project is likely to begin construction before TWE. The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to the final layout of the Energy Gateway West transmission line, as well as allowing for changes associated with the on-going colocation exercise. The need for all transmission line projects (including Energy Gateway South) to efficiently plan in a way that will support future sitings is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". Appendix D includes the revised Transmission Line Co-location Framework, which provides additional information on the co-location of the Project within corridors with existing transmission lines. The TWE construction POD will include the transmission line site-specific alignment and will incorporate the Energy Gateway West project alignment into the TWE design. An analysis of the ability for multiple future transmission lines to be placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.
PacifiCorp	162-163	In addition to the concerns noted above, the lack of definition of a 250 foot reference centerline in the TWE DEIS does not provide sufficient data to determine if all projects are aligned within the two mile wide corridor in a manner that will support siting of future extra high voltage transmission lines and is conducive to minimizing the environmental impacts. This could result in a single transmission project congesting the entire corridor making it difficult for other/future projects to be co-located.	To address resource concerns and maximize flexibility to allow for future siting of high voltage transmission lines, TWE has committed to a minimum 250' separation from existing lines. Additionally, TWE and PacifiCorp have committed to coordinating in collocating the TWE and proposed Energy Gateway South projects to the extent possible. The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to the on-going colocation exercise, as well as any other reasonably-foreseeable future transmission lines. The need for all transmission line projects (including Energy Gateway South) to efficiently plan in a way that will support future sitings is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". Appendix D includes the revised Transmission Line Co-location Framework, which provides additional information on the co-location of the Project within corridors with existing transmission lines. The TWE construction POD will include the transmission line site-specific alignment that will incorporate all route adjustments resulting from on-going co-location exercise. An analysis of the ability for multiple future transmission lines to be placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.
PacifiCorp	162-164	The TWE DEIS states on pages 2–24, "If needed, the Northern Terminal also could connect to the Energy Gateway West and Energy Gateway South 500-kV transmission lines currently proposed by PacifiCorp. TransWest requested an interconnection with both projects from PacifiCorp in 2009." It should be noted however, that TWE has no active interconnection requests with PacifiCorp due to TWE's inaction in pursuing the initial request for a system impact study made to PacifiCorp.	Comment noted.

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PacifiCorp	162-166	The project summary from the Standard Form 299 (SF299), found on the BLM website, http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/hddo/twe.Par.32580.File.dat/row-app_prelim.pdf , dated January 2010, does not reflect the project description presented in the TWE DEIS. New phased design options to the project are introduced, such as a temporary alternating current scenario, which is not reflected in the current SF-299. The BLM should request an amended SF-299 from the proponent for the project that appropriately reflects the project description. The proposed action should then be reviewed and amended as appropriate.	BLM instructions indicate that "An amendment is required any time there is a substantial deviation in use or location of a right-of-way application or grant. Substantial deviation means a change in the location or use which requires: (1) construction or use outside the proposed or authorized boundaries of the right-of-way, or (2) any change from, or modification of, the proposed or authorized use (such as adding equipment, overhead or underground lines, pipelines, structures, or other facilities not included in the original application or grant) (http://www.blm.gov/wo/st/en/prog/energy/cost_recovery_regulations/grant_administration.html). The BLM is assessing whether changes in routing and project description resulting from the EIS process constitute a "substantial deviation" from the original SF 299. If BLM determines it is a substantial deviation, it will request that TransWest submit a revised SF 299.
PacifiCorp	162-167	Rocky Mountain Power recommends that the BLM provide sufficiently detailed mapping as a supplement to the TWE DEIS for public comment, prior to the Final Environmental Impact Statement that allows the reviewer to depict a reference centerline for the project. Potential opportunities, constraints, conflicts and cumulative impacts with existing transmission lines and projects are unknown until a specific location of the TWE project is provided. The mapping for the project should illustrate the location of other known planned transmission lines and alternatives, including the Gateway West, Gateway South, and Sigurd-to-Red Butte projects. Until this data is provided by the BLM, the public cannot adequately comment on the TWE DEIS.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. The need to efficiently plan in a way that will support future unconnected action such as Energy Gateway South is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". An analysis of the ability for multiple existing and future transmission lines to be placed within designated corridors is included in Section 5.3.14.2. PacifiCorp and TWE are currently coordinating on colocating their respective projects within the project corridors identified in the Draft EIS. The end result of that colocation exercise will be subject to the narrowed corridor constraints and required design features, mitigations, and applicant-committed measures detailed in the TWE Final EIS. The final engineered alignment for the TWE project will be included in their POD prior to construction.
PacifiCorp	162-168	The attached map (Attachment A) overlays the Gateway West and Gateway South engineered centerlines along with the TWE agency preferred alternative reference centerline as presented on the BLM website: www.blm.gov/wy/st/en/info/NEPA/documents/hdd/transwest.html . The map in Attachment A clearly demonstrates the numerous right of way conflicts, impacts between projects, significant areas with limited separation and a significant number of line crossings. Rocky Mountain Power requests 1) the BLM formally acknowledge the jointly engineered alignments along I-80 as described above and; 2) formally define the TWE agency preferred alternative reference centerline. These inadequacies must be addressed in a supplement to the TWE DEIS and made available to the public for review and comment before proceeding to a FEIS (Section 5.3 National Environmental Policy Act Handbook, H-1790-1).	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. Based on identified resource concerns, TWE has determined that colocation with a minimum of 250' separation criteria is sufficient to ensure compliance with NERC and WECC reliability standards. This assertion has been validated in a 2012 WECC Reliability Subcommittee review of PacifiCorp's concern regarding revisions to the Adjacent Transmission Circuits definition. To address resource concerns and minimize disturbance, TWE has committed to a 250' separation from existing lines (which could include the Energy Gateway West project). Additionally, TWE and PacifiCorp have committed to coordinating in colocating the TWE and proposed Energy Gateway South projects to the extent possible. This on-going colocation exercise, combined with the new narrowed separation requirements, has made existing jointly engineered alignments largely moot. Additionally, the TWE EIS recognizes that the Energy Gateway West project is likely to begin construction before TWE. The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to the final layout of the Energy Gateway West transmission line, as well as allowing for changes associated with the on-going colocation exercise. The need for all transmission line projects (including Energy Gateway South) to efficiently plan in a way that will support future sitings is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". Appendix D includes the revised Transmission Line colocation Framework, which provides additional information on the colocation of the Project within corridors with existing transmission lines. The TWE construction POD will include the transmission line site-specific alignment and will incorporate the Energy Gateway West project alignment into the TWE design. An analysis of the ability for multiple future transmission lines to be placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.

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PacifiCorp	162-171	The need to maintain a minimum physical separation distance of 1500' between the Gateway South, Gateway West, TWE as well as other extra high voltage lines is consistent with this objective. In order to achieve this objective, Rocky Mountain Power believes the TWE DEIS must be supplemented to demonstrate how the objective will be achieved and fully analyze the impacts of any needed realignments. The steps to be taken by the project proponent to achieve the objective should also be identified in the TWE DEIS and these steps must ultimately become special stipulations in the Record of Decision.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. TWE has committed to locate 250' off of existing lines, which would include the Energy Gateway West and Sigurd-to-Red Butte Projects, in order to maintain reliability. The POD will include site specific layouts and will consider incorporate the Energy Gateway West alignment as it is finalized. TWE has revised its position that a 1,500' separation is required between all high voltage lines and asserts that colocation with a minimum of 250' separation criteria is sufficient to ensure compliance with NERC and WECC reliability standards. Additionally, TWE and PacifiCorp are coordinating the TWE and Energy Gateway South projects to allow for colocation of the two projects with 250' of separation to the extent possible.
PacifiCorp	162-172	Attachment D (PDTR) provides information from the TWE proponent and its purpose is to back up the technical approach in the TWE DEIS; however, it does not analyze what is proposed in Attachment D. Specifically, structures are proposed for an AC alternative in Attachment D but there are no AC structures proposed or analyzed in the TWE DEIS. Additionally, the TWE DEIS addresses a phased implementation of three design options dependent upon economics, however, these options are not presented in Appendix D. The components of the detailed engineering options are also not carried through the TWE DEIS analysis and mitigation. Failure to analyze all aspects of design options in the TWE DEIS does not provide a thorough analysis and resultant impacts for all the resource areas; therefore, potential ground disturbance for the project based on which option is eventually chosen for construction is inadequately addressed. At a minimum the impacts of all design options should be thoroughly analyzed and addressed in the TWE DEIS to adequately assess impacts. Additionally, there is no analysis in the TWE DEIS of 230-kV line from the wind farm, nor does the 230-kV supply match the amount of power that the document claims will be generated. Rocky Mountain Power requests that all design options presented in the Project Description of the TWE DEIS be addressed in the analysis to adequately identify the impacts and required mitigations.	The design options are introduced in Section 2.1.2.1, discussed further in sections 2.4.3.1 and 2.5.1.1 through 2.5.1.4 (including conductor configuration), as well as throughout the resource sections of Chapter 3. They are referred to as system alternatives in the PDTR. Ground disturbance only differs as disclosed at the terminal, substation, and series compensation stations under the design options. The Project proposes to deliver electrical power from multiple renewable and non-renewable sources in Wyoming, not a specific wind farm. As such, any 230-kV line from a specific wind farm is speculative and therefore, out of scope of this EIS.
PacifiCorp	162-173	Rocky Mountain Power understands that TWE intends to prepare a Habitat Equivalency Analysis (HEA) for their project. On Page 3.8-60, the TWE DEIS states that the BLM's framework for the HEA is included in Appendix G; however, the document was not made available with the TWE DEIS for public review and comment.	Comment noted. A summary of the HEA framework is provided in Section 3.8.6.3 Impacts Common to all Alternative Routes and Associated Components (DEIS page 3.8-60). The HEA framework will be included in the FEIS.
PacifiCorp	162-175	The following items are not supported by science: • Executive Summary, Section 3.7 Wildlife states, "To minimize potential operation-related impacts to wildlife as a result of the proposed Project, TransWest's design feature requires that the Project meet or exceed the raptor safe design standards described in the Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (Avian Power Line Interactive Committee 2006). Anti-perching within key greater sage-grouse habitat also would benefit other wildlife prey species."	Thank you for your comment. Refer to the updated additional mitigation measures SSWS-2, SSWS-4, SSWS-5, SSWS-7, and SSWS-9, described in Section 3.8.6 of the Final EIS, for proposed use of perch discouragers to reduce raptor and raven depredation of sensitive species.
PacifiCorp	162-176	Despite their declining use by electric utilities, perch discouragers have been installed in attempts to dissuade raptors and corvids from perching or nesting on power poles in areas populated by sage-grouse or other sensitive prey species. A few studies have assessed the effectiveness of discouragers in minimizing perching. These studies have been conducted on different types of lines, in different areas, and for different species. The results of these studies have varied but can be explained when looking at the differences in structure type, discourager type, and bird behavior.	Thank you for your comment. The FEIS has been revised and updated to better reflect current knowledge on the use of perch discouragers and covers for preventing electrocutions.
PacifiCorp	162-177	Prather and Messmer (2010) assessed the effectiveness of five different perch-discourager installation types on a distribution line in southern Utah in an area with Gunnison sage-grouse (<i>Centrocercus minimus</i>). The study found that none of the discouragers were more effective than the control structures in preventing perching. The study also evaluated the line for sage-grouse predation but did not document any sage-grouse predation associated with the line. Rather, the majority of prey remains documented were lagomorphs. It should also be noted that Rocky Mountain Power documented eagle electrocutions on this line (outside of the study) after the discouragers were installed.	Thank you for your comment. The FEIS has been revised and updated to better reflect current knowledge on the utility of perch discouragers for preventing electrocutions and minimizing the potential for increased GRSG depredation from raptors and ravens that begin using project facilities as hunting perches.

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Commenter Name	Comment ID	Extracted Comment	Response
PacifiCorp	162-178	Slater and Smith (2008) evaluated the effectiveness of existing perch discouragers on an H-frame transmission line in southwestern Wyoming. The line with perch discouragers was adjacent to an existing line of similar construction without perch discouragers. The results of this study showed that birds used the structures without perch discouragers more than structures with discouragers, but perching was not entirely prevented. Given the close proximity of the two lines, it is not surprising that birds selected an “open” perch site as opposed to one with a barrier. The study documented the construction of a raven nest between deterrent devices. Two sage-grouse mortalities were documented during the study; the deaths were suspected to have resulted from avian predation and a line collision.	Thank you for your comment. The FEIS has been revised and updated to better reflect current knowledge on the variable/uncertain effectiveness of perch discouragers.
PacifiCorp	162-179	Lammers and Collopy (2007) conducted a study to evaluate the effectiveness of perch discouragers on the Falcon–Gondor transmission line in Nevada. This study found that although the duration of perching events was minimized on structures with discouragers, birds were still able to overcome the discouragers. Consequently, the authors felt that the discouragers did not achieve the desired results.	Thank you for your comment. The FEIS has been revised and updated to better reflect current knowledge on the use of perch discouragers for reducing perching by raptors and corvids that could lead to increase predation rates on sensitive species along the Project route.
PacifiCorp	162-180	These studies have documented that the availability of other perch sites influences the effectiveness of perch discouragers. In study areas such as Wyoming, where other available perch sites were nearby, perch discouragers appeared to be more effective and “pushed” birds from one perch location to another. In study areas such as Utah, where other perch substrates were limited, the birds overcame the perch discouragers and were able to perch on the structures despite the discouragers. As part of our APP risk assessment and follow-up surveys, PacifiCorp is evaluating the effectiveness of perch discouragers and intends to publish this information. These perch discouragers have been previously installed throughout the Rocky Mountain Power’s service area in open habitats such as sagebrush, grasslands, agriculture, and pastures, including areas where sage-grouse occur. The results of this research have shown increased rates of perching, nesting, and bird electrocutions on poles with perch discouragers compared to poles without perch discouragers. As a result of these unexpected detrimental impacts of perch discouragers, their use has since been discontinued by the company as a retrofitting measure.	Thank you for your comment. Public and agency reviewers have requested additional mitigation measures specifying the use of perch discouragers for minimizing potential project impacts associated with increased perching opportunities for raptors and corvids and, consequently, increased avian depredation of sensitive species including pygmy rabbit, desert tortoise, greater sage-grouse, Utah prairie dog, black-footed ferrets and their prey. The variable or uncertain benefit of using perch discouragers for this purpose has been identified in the effectiveness statements for applicable measures in Section 3.8.6. of the Final EIS and elsewhere in this section, as appropriate.
PacifiCorp	162-181	Because perch discouragers may push birds to nearby poles that may pose an electrocution risk, their use is discouraged (APLIC 2006). Likewise, in areas where raven predation on sage-grouse nests is a concern, perch discouragers may aid in the accumulation of nest material (APLIC 2006) and could potentially increase raven predation pressure due to nest construction on discouragers in sensitive areas. The negative impacts of perch discouragers must be weighed against the limited benefits they may provide, particularly if contribute to mortalities of protected birds and facilitate increases in predator nesting populations. The avian predators of sage-grouse should also be considered, as different species exhibit different hunting strategies, and they employ different hunting techniques for different prey species. For example, the golden eagle (<i>Aquila chrysaetos</i>) diet is largely mammalian (80–90%, Kochert et al. 2002). Golden eagles prey on sage-grouse opportunistically and typically hunt sage-grouse by swooping from a high soar (Watson 1997, Kochert et al. 2002). Consequently, power poles may not play an important role in eagle predation of sage-grouse. Golden eagles are vulnerable to electrocution mortality (APLIC 2006) and perch discouragers have been correlated with increased eagle electrocution risk (PacifiCorp, in prep.). Common ravens are known predators of sage-grouse nests, yet ravens are able to overcome perch discouragers and may experience higher nesting rates on poles with perch discouragers.	Thank you for your comment. Information from this comment has been considered and incorporated into the FEIS as appropriate.
PacifiCorp	162-184	Socio-Economic Impacts: As noted above, the TWE DEIS does not acknowledge the cumulative effects of Gateway South, Gateway West and Sigurd to Red Butte #2 transmission lines. Rocky Mountain Power requests the EIS reflect socioeconomic impacts on existing, eminent and future Energy Gateway projects and be analyzed in detail in the cumulative effects section.	The cumulative socioeconomic analysis for past, present, and reasonably foreseeable future projects, including proposed transmission lines, was disclosed in Section 5.3.17.2 of the Draft EIS. The level of detail addressed is constrained because the specific construction scheduling for TWE and other reasonably foreseeable transmission projects is quite variable and depends upon not only when the projects are approved, but also what part of the respective transmission line is being worked on at any given time. However, given the foreseeable timing of the transmission line construction and the large amount of linear length that could be worked on at any time, the risk of overlap in site-specific construction at any given location or time is very low (See Section 5.2.17.2 of the Draft EIS and Final EIS).

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Commenter Name	Comment ID	Extracted Comment	Response
PacifiCorp	162-185	<p>General Mapping Representation of Project The maps are difficult to read because of their small size (8.5 inches x 11 inches). It is noted that the shapefiles have been placed on the BLM webpage however; the general public does not know how to use shapefiles. All map figures lack a reference centerline for the 600kV high-voltage, direct-current (HVDC) transmission line and, therefore, should be considered insufficient and inadequate to allow reviewers to provide specific comments on the proposed action and resultant impacts for the alternative routes. While a 2-mile-wide study corridor provides context of general resource issues programmatic in nature, a specific reference centerline needs to be defined by the agencies and TWE prior to finalizing alternatives and the beginning of the environmental inventory and assessment.</p> <p>In compliance with NEPA, Rocky Mountain Power recommends that the BLM update the maps to depict a reference centerline for the project as soon as possible and redistribute the maps for public review. Potential opportunities and constraints with other existing transmission lines and proposed utility projects are unknown until a more specific location of the TWE project is provided in conjunction with other existing and planned transmission lines. In this respect, the mapping for the project should also illustrate the location of other known planned transmission lines and alternatives, including the Energy Gateway West, Energy Gateway South, and Sigurd to Red Butte projects."</p>	<p>The EIS figures depict either a reference line/alignment or the Project corridors depending on the resource and the data used for analyses.</p> <p>The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach.</p> <p>TWE has committed to locate 250' off of existing lines, which would include the EGW and Sigurd-to-Red Butte Projects, in order to maintain reliability. The POD will include site specific layouts and will consider incorporate the EGW alignment as it becomes finalized. Appendix D of the Final EIS includes the revised Transmission Line colocation Framework, which provides additional information on the colocation of the Project within corridors with existing transmission lines.</p> <p>The need to efficiently plan in a way that will support future unconnected action such as EGS is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". An analysis of the ability for multiple future transmission lines to be placed within designated corridors is included in Section 5.3.14.2 of the Draft EIS.</p>
PacifiCorp	162-186	<p>Appendix D: During our review of Appendix D, RMP identified the following inconsistencies between engineering detail and documentation/analysis:</p> <ul style="list-style-type: none"> General - The proposed structure does not match the visual simulations depiction of the structure. Figure 1 - The view is ahead- or back-span so the guy wires appear to be coming down at a steeper angle (and therefore a narrower footprint); however, the true down-angle would likely be 45-degrees but at a 45-degree angle to a head- or back-span, so the actual distance on a flat surface would be 200' to 300'+ from the structure pin base if the guys are brought up to the bridge attachment area. Figure 15 - This "Typical Transmission ROW & Construction Work Areas" figure really should depict the "typical" anticipated tangent structure to provide the reviewer with a truer depiction for the scale of the structure. Depicted are self-supporting lattice towers with a 30 ft x 30 ft footprint. By using the guyed structures and scaling out the guy wires, the reviewer would be able to see the true overall width of the structure footprint. Figures 23 and 24 - Why wouldn't the hatched areas be considered "permanent disturbance areas", as all vegetation would have to be removed and kept from returning (besides grassy vegetation)? This would be 190 ft x 190 ft (36,100 sf) as depicted for the guyed structures (on flat ground) in Figure 23 (vs the total of 500 sf presented in Table 1 for the same guyed structures). Table 1 - Indicates only a 30 ft x 30 ft permanent disturbance for self-supporting lattice tangents; there seems to be no estimation or inclusion for any work areas/maintenance. 	<p>The simulations are based on the 3-D AutoCAD file provided by TransWest, complete with structure and four guys. This is the same file as used for Appendix D, Figure 1. The width of the ROW is right-angle to the cross-arms of the structure. The guys are not at right-angle to the cross-arms of the structure, but rather 22.5 degrees. Thus, the 45-degree guys fit within the 250-foot ROW. Figure 15 was provided as a true depiction of the scale of the self-supported structures. Guyed structures were not provided in the Appendix D document. The simulations do consider the hatched area in Figures 23 and 24 as permanent disturbance areas. The 500 sq.ft. disturbance number is based on the permanent disturbance from concrete pads. An analysis of potential operation disturbance impacts is discussed by resource in the EIS.</p>
PacifiCorp	162-187	<p>Appendix D Attachment D provides information that supports TWE's technical approach, but the DEIS does not analyze what is described. The list below indicates areas where the information provided by TWE is not adequately analyzed:</p> <ul style="list-style-type: none"> Structures are proposed for an AC alternative in Attachment D, but they are not analyzed in the DEIS. Converter stations would not work as proposed. An engineering technical report discusses what "might" happen but lacks engineering detail. The "Line could be AC then transfer to DC" statement is speculative and adds no detail; similarly, other design options are not specific. The substation approach described in the DEIS is conflicting. It appears there is no coordination with local transportation plans. The document contains no analysis of proposed 230-kV line from the wind farm. The 230-kV supply does not match the amount of power that the DEIS indicates will be generated. As an associated action under NEPA, the line must be analyzed in the project and disclosed in the DEIS so the public can comment. The plan only indicates a connection at the northern terminus of the 230kV line, not with any other transmission line. 	<p>The applicable difference in AC vs. DC structures is the number of conductors (3 vs. 2, respectively), which is relevant to visual resources and discussed in Section 3.12.</p> <p>The function of the converter stations is beyond the scope of this EIS.</p> <p>The EIS considers the information provided in multiple engineering technical reports, including what "might" happen. Design Options are discussed in Section 2.1.2, and their specific impacts are disclosed in Chapter 3 resource sections. Additional detail can be found in Appendix D.</p> <p>We could not identify the substation approach that is commented upon.</p> <p>Local transportation plans will be considered during the planning stages after the ROW is granted but before the Notice to Proceed is given.</p> <p>Section 2.1.1 of the Draft EIS indicates that although the Project's goals include providing consumers with renewable energy, the Project would have the capacity to transmit power generated by existing and/or reasonably foreseeable renewable or non-renewable sources in Wyoming. This extends beyond any singular wind farm. Power supply for transmission may come from a number of potential sources; no electricity generation is proposed as part of the action analyzed in the EIS.</p> <p>Section 2.4.3.1 of the Draft EIS discusses multiple potential connections located at the northern terminal.</p>

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Commenter Name	Comment ID	Extracted Comment	Response
PacifiCorp	162-188	Chapter 3.16 assumes that all proposed access is both new and permanent. Section 3.12.12 states, "An Access Road Plan would be developed for the Agency Preferred Alternative during final engineering and design, which would define site-specific access to each structure and temporary work area and would be included as part of the COM Plan." It appears only existing roads have been identified and no temporary roads have been analyzed. Our understanding is that detailed road information will not be developed until a later date. The BLM should provide documentation that describes the agency's assumptions underlying the road analysis indicated here, to ensure the impacts are disclosed in the analysis.	Section 3.16 was revised to further clarify the Road Access Plan process and refers to Appendix D, which provided further detail.
PacifiCorp	162-189	Chapter 2, Tables 2-23, 2-24, 2-25, 2-26, 2-27Tons of PM10 emissions are reported with no reference to the NAAQS threshold that it is appropriate to compare them to. Likewise, there is no reference to the time-step that is applicable for these emissions figures. Are these annual total emissions? Also, why are only PM10 numbers reported? Were emissions inventories completed for other criteria pollutants, as required?	The listed tables from Chapter 2 provide an overview of the impacts to all resources from the Project. The level of detail provided in Chapter 3 and Appendix E on the impacts to air quality and climate change cannot be captured in these high level tables. The largest impacts were selected for inclusion in this summary and the reader can review the detailed analyses in Section 3.1 and supporting Appendix E to better understand the implications of these impacts. The EIS was updated to specify that the units for these emissions are tons per year.
PacifiCorp	162-190	Page 3.1-10, Section 3.1.4.3, Paragraph 6This paragraph notes the "closest" Class I areas to project alternative routes but it excludes other areas that may be pertinent to the analysis. Bryce Canyon National Park and Canyonlands National Park are both proximal to the project alternative routes but appear to have been ignored. Also, based on the distances reported in this section none of the "closest" Class I areas fall within the analysis area established for this analysis. Either the analysis area was described incorrectly or these areas should be excluded from the analysis altogether.	Figure 3.1-1 was revised to show all Class I areas. The section describing the analysis area was updated to clarify that the distance evaluated varies by the type of impact being evaluated. The section on Impacts at Class I and II Areas-Visibility was revised to clarify how impacts at all Class I Areas adjacent to the Project were evaluated by a worst case screening analysis based on the shortest potential distance of a concrete batch plant to a Class I Area.
PacifiCorp	162-191	Section 3.1.3, Paragraph 4The analysis area for direct air quality impacts is defined as the area within 5 km of the proposed and alternative reference lines however there is no rationale provided for why this is an appropriate analysis area for direct impacts to air quality. Also, this analysis area appears not to address indirect impacts, which the BLM is required to address in its analysis.	Section 3.1.3 was updated by moving and revising a more accurate description that was found in Draft EIS Section 3.1.6 paragraph 1 to Final EIS Section 3.1.3.
PacifiCorp	162-192	Table 3.4-3 is intended to tabulate "Major Rivers and Impaired Waters within Analysis Area and Project Regions". However, some rivers/impaired waters have been removed from the 303(d) list and are therefore not considered impaired. It appears that others have not been listed as impaired at all. Combining major rivers and impaired waters into one table makes it difficult to discern important major rivers in terms of potential impacts from impaired waters in terms of potential impacts. It would be more effective to convey this information in two separate tables. This is particularly true for impaired waters where there may be Total Maximum Daily Loads (TMDLs) in development intended to address the impairments.	This table is intended to convey baseline information. Impacts to water resources, including impaired streams, are discussed in Section 3.4.6 of the Draft EIS.
PacifiCorp	162-193	General comment: Section organization is confusing. The regulatory background is presented without introduction and before Baseline Conditions or any discussion of impacts indicators or rationale for analysis. There needs to be a short description of how the section is organized at the very least. The section is based on a combined "Chapter 3 and 4" format, but the information does not seem to be presented in logical order or with any guidance to the reader as to how the introductory information is relevant to impacts analysis.	An introductory paragraph has been added to the section to clarify the layout of the section. The format is consistent with the other resource sections in the EIS.
PacifiCorp	162-194	The coarse-scale vegetation communities does not provide an adequate level of detail to sufficiently analyze impacts, particularly to sensitive or rare resources such as white shale endemics, desert-pavement associated species, and other rare communities and associated endemic or rare species. The level of detail provided in the descriptions of the coarse-scale vegetation cover and land use types is inconsistent. Some cover types include detailed descriptions of specific vegetation communities within the larger-scale cover type with associated species, while others are only generally described. If there is a rationale for this inconsistency, or if details are presented elsewhere, it should be clearly stated for the reader.40 CFR §1502.24 and BLM NEPA Handbook §6.8.1.2 require that any methodologies and assumptions (such as rationale for inconsistency in detail) used in the impacts analysis be described in the EIS.	The level of detail is appropriate for an EIS analysis covering a large area. Specific detail is provided as explained in the methodology section for areas of concern including wetlands and riparian communities, woody vegetation communities to be impacted by vegetation clearing and management actions, and vegetation areas with reclamation constraints. The vegetation communities with the greatest amount of impact from each alternative are highlighted as well. Additional detail on this has been added to the methodology disclosed in Section 3.5.6.
PacifiCorp	162-195	Section 3.6.4As of August 6, 2013 both Penstemon grahamii and Penstemon scariosus var. albifluvis status have been upgraded to Threatened with designated critical habitat including all occupied habitat for the species.	The status of these two species has been updated in the FEIS. Critical habitat for these species has been added to the analysis for the FEIS.
PacifiCorp	162-196	Section 3.17.5.1, Paragraph 14, last sentence: This statement that the project would raise the valuation of homes and commercial property in Rawlins seems speculative. Please provide a reference for this statement.	The statement cited in the comment indicates that the Project would act to support or raise valuations. The conclusion reflects a widely accepted effect of increased demand in maintaining or raising real estate prices, which in this instance, would be due to the Project's direct and secondary job creation and labor force migration. Because the magnitude of the effect isn't quantified, the text was revised to describe that the effect would be the result of increased demand (See "Temporary Housing" subsection).

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PacifiCorp	162-197	Rocky Mountain Power noted that the BLM and TWE encourage the use of anti-perch devices as means of mitigation to discourage raptors from perching on structures. Perch discouragers were originally designed to reduce raptor electrocutions and were widely used by the electric utility industry from the 1970s to the 1990s. Perch discouragers were intended to move birds from an unsafe perching location to a safer alternative, either on the same structure or nearby on the same line (APLIC 1996). For many years, perch discouragers comprised the only available option for retrofitting poles to reduce electrocutions. However, recent data has documented poor effectiveness in perch discouragers and greater effectiveness of covers for preventing electrocutions (APLIC 2006). This has resulted in a shift towards covers instead of perch discouragers for electrocution prevention. PacifiCorp is evaluating the effectiveness of perch discouragers and intends to publish this information. These perch discouragers have been previously installed throughout the Rocky Mountain Power's service area in open habitats such as sagebrush, grasslands, agriculture, and pastures, including areas where sage-grouse occur. The results of this research have shown increased rates of perching, nesting, and bird electrocutions on poles with perch discouragers compared to poles without perch discouragers.	Thank you for your comment. For an ultra-high voltage transmission line such as TWE, avian electrocutions are unlikely due to the wide spacing of conductors and perch discouragers or covers have not been proposed as mitigation for addressing this minimal electrocution risk. Perch discouragers have been proposed as mitigation for impacts associated with increased perching by raptors and ravens and resulting increases in depredation rates of sensitive species. The FEIS has been revised and updated to better reflect current knowledge on the use of perch discouragers for this purpose.
PacifiCorp	162-198	3.8-37-38 and C-125-127. SSS Wildlife, Section 3.8.6The presentation of mitigation measures throughout the impact-analysis chapter leads the reader to believe that they are design features or requirements. It should be stated clearly that mitigation measures may or may not be required under the ROD.	DEIS page 3.8-36 states that the measures identified are suggested mitigation, not design features. Section 1.1.1.1 (DEIS page 1-5) provides information on decisions to be made by the BLM Wyoming state director and the inclusion of terms and conditions (mitigation) to be included in the ROD.
PacifiCorp	162-199	C-11 Appendix C, VIS-7 (WVEC)"Environmental compliance documents associated with the activity consider how to limit habitat fragmentation (regardless of the GRSG seasonal habitat)." Please describe how habitat fragmentation would be limited and what mitigation measure will be applied to areas where fragmentation cannot be limited.	Comment noted. The referenced mitigation measure is required in WVEC only. The applicant and BLM have committed to avoiding sensitive habitats to the extent possible or as required by other federal and state regulations as discussed in Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17).
PacifiCorp	162-200	C-13 Appendix C, FIRE-2 (WVEC): The SOCIO-2 mitigation measure commits TWE to purchase materials, equipment, and supplies locally to the maximum extent practicable, have construction materials delivered on freight on board (FOB) basis to the counties in which the materials will be utilized, and it commits TWE to complete all reports regarding taxable purchases in a timely manner. This mitigation measure would not reduce any impacts of the proposed project. The BLM should clarify the benefit or delete the measure.	See comment letter 195 from Sweetwater County endorsing the local procurement and reporting policies outlined in SOCIO-2. The benefit of this measure would be to more closely align the flow of sales and use tax revenues to the affected jurisdictions and help fund local government response to construction-related service demand, should such response be required. The benefit is explained in the statement on "Effectiveness."
PacifiCorp	162-201	Appendix D, Chapter 3, Sec. 3.7, Table 9, Mitigation Measures, (Appendix C, Table C2-1, TWE-43): The SOCIO-4 mitigation measure commits TWE to develop and implement a plan for ongoing communication with local county and municipal governments to inform them of construction progress. This mitigation measure would not reduce any impacts of the proposed project. The BLM should clarify the benefit or delete the measure.	The experience of local governments across the west over the past 30+ years has established that reliable information regarding proposed and ongoing energy development and major construction activities in a specific jurisdiction is essential for elected officials and public agencies in performing their duties and serving the public. Accurate information can facilitate more efficient and improved service delivery, which can in fact reduce adverse impacts or enhance beneficial impacts. The text was changed to communicate the benefit of this measure.
PacifiCorp	162-203	Appendix D, Chapter 3, Sec. 3.7, Table 9, Mitigation Measures, (Appendix C, Table C2-1, TWE-64): "Applicants shall prepare a VRM or scenery management plan. The applicant's planning team shall include an appropriately trained specialist, such as a landscape architect with demonstrated VRM and/or SMS experience. The VRM/SMS specialist shall..." The BLM should provide additional information regarding when the scenery-management plan will be prepared and how it will reduce impacts.	The Applicant Design Feature noted in the comment is a stated commitment on the part of the TransWest. The EIS analysis for visual resources analyzes, disclose impacts, and proposes mitigation for areas where there are VRM and scenery conflicts by a trained and highly regarded landscape architect. The VRM or scenery management plan will be prepared as part of the ongoing POD process for the ROW grant and will use information disclosed in the EIS to inform the basis for this plan.
PacifiCorp	162-204	3.8-37-38 and C-125-127. SSS Wildlife, Section 3.8.6: "A preconstruction meeting with BLM/FS landscape architects or other designated visual/scenic resource specialist shall..." The BLM should provide additional information regarding the benefits of this measure.	After searching through the document, particularly Sections 3.8 Special Status Wildlife, 3.12 Visual Resources, and Appendix C, no such statement has been found. As such, we are unable to address this comment.
PacifiCorp	162-206	C-13 Appendix C, FIRE-2 (WVEC): "Non-specular conductors and shield/ground wires will be used to reduce potential visual impacts. "Mitigation measure 44 commits TWE to the use of nonspecular ground wires and shield wires. Conductor wires are aluminum and are easy to make nonspecular. Ground wires and shield wires, however, are made of galvanized steel in order to protect them from the elements. They are smaller and higher above the ground, which inherently reduces visual impacts. Making these nonspecular would compromise the integrity of the wires by marring the coating that is intentionally put on them in the first place.	The section has been edited to reflect the information.
PacifiCorp	162-207	Appendix D, Chapter 3, Sec. 3.7, Table 9, Mitigation Measures (Appendix C, Table C2-1, TWE-43)"... Operate all vehicles on designated roads, or park in areas free of vegetation..."It is unreasonable for the BLM to require TWE to commit to areas free of vegetation. This measure should be deleted.	This is an applicant committed design measure provided by the applicant.

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Pilot Gold (USA) Inc.	562-1243	The proposed transmission line passes within 5 miles of our project in the Drum Mountains, Millard County, Utah (Attachment 1). Alternative 111-0 crosses directly over Pilot Gold's unpatented lode mining claims in Lincoln County, Nevada (Attachment 2). Pilot Gold is concerned that access to our mining claims may be hampered by the construction of the project. We currently have an active Notice of Intent to conduct exploration activity at Brik (NVN-89546) and we are applying for a Notice of Intent to conduct exploration activity at Drum Mountains. Our access to explore and develop a mine must not be limited.	The lead agencies have directed TWE to coordinate as necessary with existing holders of valid existing rights and land owners to minimize land use impacts on existing or reasonably foreseeable land uses. It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Due to the thousands of miles of alternatives, it is not feasible to analyze all of the claims and leases for validity or potential commerciality, or mitigate for all possible situations that may arise with regard to resource conflicts. It is also not possible for the BLM to dictate the terms and conditions in agreements between the applicant and mineral owners or lessees. The BLM will issue a ROW grant that is consistent with applicable regulations but recognizes that the applicant must acquire all access permissions in mixed ownership situations and it is expected that mineral rights conflicts would be resolved prior to construction. The proposed transmission line, when constructed, will occupy a 250-foot wide ROW. The 250-foot wide ROW should facilitate resolution of many perceived conflicts. The terms and conditions of the ROW grant, as specified in 43 CFR Subpart 2801, includes "the right [of the BLM] to require common use of the right-of-way, and the right to authorize use of the right-of-way for compatible uses (including the subsurface and air space)." The BLM recognizes that subsurface activities (in this case, mineral extraction) may not in all cases be compatible with the intended ROW use but as stated above, potential conflicts must be resolved prior to construction. It also should be noted that although many unpatented mining claims have dubious validity, it is the responsibility of the ROW grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners.
Poppitt, Gordon	443-664	It would cross over an area which is known as Cane Springs Draw. Cane Springs Draw has an aquifer below it which is, as my understanding, it partially feeds the aquifer that is used by the community of Central. It's an unincorporated community. We have our own water district, special service district, and, so, we are dependent on that water. They just did a lot of work putting new wells and pipelines in there. But, the adverse effects are that's a danger, is the fact that there may be additional pylons through there could collapse the surface over the aquifer, which would, obviously, be disastrous for the community.	Information will be added to Section 3.4.6.3 of the Final EIS to address this concern. Tower foundations would generally be less than 15-25 feet deep, with potential for foundations up to 60 feet deep for tubular steel poles that are currently only proposed for use in highly constrained urban areas. Because of the linear nature and relatively shallow depth of the Project, no impacts to groundwater resources are anticipated.
Price, Jerry	444-1981	when they go to survey if they happen to have to go through our property, we would like to be there. We have to go through other people's properties to get to ours, and they have gates as well, but we have keys to those. We'd be glad to let them in and show them what we got.	As disclosed in Section 1.6 of the Draft EIS, private landowners may negotiate stipulations to address resource impacts as part of their easement acquisition agreements with TransWest or Western. These could include access stipulations and controls related to surveying.
Price, Jerry	444-670	We have 20 acres, and our son has another 10 with us. We have 30 total. The way the power line looks like it's kind of in between, so they will be going right close to our property. And what we're concerned about is we have locked gates, and we don't want theft or anything like that going on. We want to make sure it stays the way it is and not just have a free-for-all, people coming and going all the time. We have a good system the way it is, and we don't want to screw it up. That's our main concern. And we do have a power line already that's about a half a mile away, and it don't bother us at all. That one they didn't have any people come in or out or nothing like that, but this new one, I don't know if it's going to be bigger, more people, more maintenance. I don't know. So I'm just concerned about them. We're right between the one that's existing and the new one that's going, and it's not going to affect us because it's far enough away, but we're worried about the gate at the bottom having people having a free-for-all, and we don't want that.	For areas of the proposed Project that cross private land, terms of an easement would need to be negotiated with each of the private land owners, which could include requirements to lock gates as well as constraints on who may access that property. As described in Section 1.6 of the EIS, "TransWest, or Western if they choose to participate in the proposed Project, would negotiate details regarding needed land acquisition across non-federal lands (e.g., private, county, state), either in fee or as an easement for the transmission line and associated facilities (substations, etc.), with each landowner. A private land easement, usually negotiated with the landowner, is the legal instrument that would be used to convey a ROW to Western or TransWest. The easement would give TransWest or Western the right to operate and maintain the transmission line in the permanent ROW and, in return, would compensate the landowner for the use of the land. The easement negotiations between TransWest or Western and the landowner could include compensation for loss of use during construction, loss of nonrenewable or other resources, and the restoration of unavoidable damage to property during construction."
Price, Jerry	444-671	How does that work if you have a pacemaker or something like that if the power lines go over?	As stated in Section 3.18 of the Draft EIS, the recommended exposure level from the World Health Organization (WHO) for cardiac pacemakers is 5,000 mG. Exposure from the proposed Project would be considerably less than the WHO recommendation, equaling approximately the same exposure level as what occurs naturally.
Price, Jerry	444-672	We're in Willow Creek Canyon, and there's really not a name for the area we're at other than Willow Creek, and the creek that comes through Price right here, it runs right at the bottom of our property. And they won't interfere with the watershed or nothing like that, will they? Will they interfere with the watershed or water? We're concerned a little bit about that too.	Alternative II-D would follow Willow Creek through the canyon north of Price. Alternatives II-E, II-F, and the Emma Park Variation would cross the upper part of the Willow Creek Watershed. Disturbance within the watershed is disclosed by alternative in Table 3.4-11 of the Draft EIS. Section 3.4.6.3 of the Draft EIS discusses the types of impacts that might be expected.
Quarter Mile Ranch	425-629	do not like their power lines going through our property because we're it shows now -- I forgot the number -- it would disturb all our springs, and we have several springs up there, and even if you dig a mile or two away from the springs, it will affect the springs.	Alternative II-E would cross Minnie Maud Creek and alternatives II-E and II-F would follow the ridges to the south and north of Minni Maud Creek, respectively. These areas are all located within Upper Ninemile Creek Watershed. Disturbance within the watershed is disclosed by alternative in Table 3.4-11 of the Draft EIS. Section 3.4.6.3 of the Draft EIS discusses the types of impacts that might be expected. The data source used to identify springs is the NHD Dataset.
Quarter Mile Ranch	425-630	It's called Minnie Maud Canyon. It's very steep for one thing, and I just can't see a power line up on that in that area. You know, we have flash floods. We had some bad, bad flash floods coming off of that north side, Segment 218 -- and my neighbor's, it's more of a ranching area. It's private property on both sides of the road. My neighbors have like 4,000 or 5,000 acres handed-down property, and he told me today he has 28 springs on his property, and, you know, if things don't work out, he says he hates to lose them.	Alternative II-E would cross Minnie Maud Creek and alternatives II-E and II-F would follow the ridges to the south and north of Minni Maud Creek, respectively. These areas are all located within Upper Ninemile Creek Watershed. Disturbance within the watershed is disclosed by alternative in Table 3.4-11 of the Draft EIS. Section 3.4.6.3 of the Draft EIS discusses the types of impacts that might be expected. The data source used to identify springs is the NHD Dataset.

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Commenter Name	Comment ID	Extracted Comment	Response
Red Rock Audubon Society	578-909	A significant portion of the preferred route is also through Pinion-Juniper woodlands, which will burn at some time in the future. Such a fire will take down the power line unless the BLM is proposing to clear a corridor at least 400 feet wide under and adjacent to the powerline, and maintain that clearing. Such a clearing would be a huge physical and visual intrusion on the landscape and would not be supported by us. The probability of fire is also a significant security issue for the powerline.	A separate section on wildfire was added to the Final EIS as Section 3-21. Additional detail on wildland fire effects was added to the Final EIS as appropriate to wildlife, visual, public health and safety, and cumulative impacts. A fire protection plan will be developed as part of TransWest's Construction, Operation, and Maintenance Plan. As appropriate, specific requirements of the fire protection plan were outlined as mitigation in the wildfire section. See Appendix D, part 1 and 2 of the Final EIS for TWE's committed environmental mitigation measures related to fire protection (No-64).
Red Rock Audubon Society	578-910	We are also concerned with the route as outlined in the Draft EIS from Toquop south to the terminus in the Eldorado Valley. Because the DEIS for this project was prepared under the belief that FERC would require a 1500 foot separation between any two power lines of 345KV or higher voltage, the proposed corridor is unnecessarily wider than it needs to be. This is a problem everywhere because it greatly expands the width of the existing corridor and at choke points like Rainbow Gardens and the Las Vegas Wash east of Las Vegas it necessitates deviation from the existing corridor.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach. Chapter 2 describes the updated separation criteria considered in the Final EIS, which is a general minimum offset of 250 feet from existing transmission lines (decreased from a general 1,500 feet with 250 feet only considered in locations with specific resource or management constraints in the Draft EIS).
Red Rock Audubon Society	578-911	In order for everyone, including the applicant, to know exactly where the proposed line would be sited we think that a supplemental EIS, which is based on a 250 foot separation from other powerlines (the new FERC guideline), needs to be prepared. In sensitive areas such as the Las Vegas Wash, the city of Henderson and the Las Vegas Bear Poppy habitat east of Sunrise and Frenchman's mountains the exact location of the route needs to be determined prior to any approval. Only if the actual location is known can appropriate mitigation needs be determined.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach. To address resource concerns and minimize disturbance, TWE has committed to a 250' separation from existing lines. The corridor narrowing approach used in the TWE EIS provides flexibility to adjust to both existing transmission lines as well as reasonably foreseeable future projects (including proposed transmission lines). The need for all transmission line projects to efficiently plan in a way that will support future sitings is addressed by the WWEC BMP GEN-5, which states that "Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas". Appendix D includes the revised Transmission Line Co-location Framework, which provides additional information on the co-location of the Project within corridors with existing transmission lines.
Red Rock Audubon Society	578-912	We also need to know just which tower design will be used if this project is approved. In terms of minimizing the visual impacts, area of ground disturbed and the impacts to bird life, lattice work towers are preferred. We are aware that there is a concern in some quarters about tower designs that facilitate perching and nesting by raptors, but feel that when adding another line to an already existing corridor where the existing lines are supported by lattice work towers there is no real benefit to tortoises and other wildlife by changing the tower design to the more visually intrusive monopoles, which require a larger area of land disturbance, or the less bird friendly guyed structures.	Final tower designs will be identified during the final engineering of the transmission line. These tower designs must comply with the stipulations and mitigation measures included in the Record of Decision to decrease impacts to resources.
Red Rock Audubon Society	578-914	Due to its length and route the proposed TransWest Express transmission line will traverse a wide variety of habitat types, ranging from creosote bush scrub to montane forest. While general best management practice guidelines are good to have we really need to have detailed mitigation and recovery plans for every habitat type and specific area of the transmission line. For example, where the line crosses Las Vegas Bear Poppy habitat we need to have specific mitigation and recovery measures spelled out in advance for public scrutiny, rather than just say topsoil will be stockpiled and then spread out over the disturbed areas at the end of construction activities.	The Final Plan of Development developed by the applicant prior to construction will focus on site-specific reclamation plans that will meet the land management agencies land use plan requirements.
Red Rock Audubon Society	578-915	It is crucial that new roads constructed to install and service the transmission line do not attract and facilitate casual off-road vehicle use by the public, which in many instances is more damaging than the line itself, especially near urban areas.	As stated in Section 3.13.6.8 on DEIS page 3.13-34, project access roads would be evaluated on a case-by-case basis by the appropriate federal or state land manager to determine whether to close roads to the public, close and reclaim roads, or leave roads open as part of the transportation network. The text acknowledges that closed roads may be an attractive nuisance and lead to unauthorized OHV use and associated resource damage, noise, etc. Other deterrents such as barriers, contouring, and revegetation may be used to indicate closed roads as determined on a site-specific basis depending on site-specific needs, management requirements, and reasonable application of the treatment. Where appropriate, mitigation measure REC-2 is proposed to limit access to existing roads and/or require reclamation of any new roads.
Reich, Rita	251-287	I kindly recommend that the BLM remove the alternative routes (II-B and II-C) through Rio Blanco and Garfield Counties immediately, and choose I-A and II-A. The increased mileage leading to increase costs and decreased potential benefits is a step in the wrong direction for such a promising project.	Section 2.5.1.2 of the Draft EIS provides the rationale for why Alternative II-B and II-C have been retained for detailed analysis. The analysis in the Draft EIS validates this rationale; therefore the alternatives have not been eliminated between Draft and Final EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
Reno-Sparks Indian Colony Tribal Council	202-562	<p>Although the RSIC has been receiving correspondence sent on behalf of BLM, the RSIC has elected to not participate in the Project, and has never had any dialogue with anyone regarding the TransWest PA, the Energy Gateway PA or the DEIS. As you are aware, one-way communication from the agency or others on its behalf to RSIC is not "Government to Government Consultation;" rather, "Government to Government Consultation" is a two way dialogue which involves communications between the agency and government.</p> <p>On the TransWest PA, page 4 of 28, of the 20th Whereas, it states that "the BLM, as lead agency for tribal consultation and coordination continues to consult with the.....Reno-Sparks Indian Colony,....." This is not an accurate statement. Again, the RSIC has never participated in any dialogue or discussions with the BLM Wyoming State Office, the Western Area Power Administration, or others regarding the Project.</p> <p>Therefore, while the RSIC appreciates your communications, we are formally requesting that any reference to RSIC as a government of which "Consultation" has, or is, occurring, including any reference to RSIC in the above mentioned documents including the DEIS and DRAFT PA for the TransWest Express Transmission, be removed from the document(s).¹ In addition, please do not continue to reference the RSIC in the DEIS and the TransWest PA as a government that is being consulted with, and/or that consultation is ongoing.</p>	The text in section 3.11.4.3 has been revised to address the comment.
Rice, Staci	194-561	That said, it's not like anyone will really notice another transmission line anyway. My sister and her family live right under a big power line and none of us even pay attention to it at all. It's almost funny to me that you would spend 88 pages on this subject but I guess that shows you have analyzed and addressed "visual resources" very comprehensively.	Thank you for your comment.
Rich, Lila	445-504	Also, people have told -- have commented to me that they're concerned that that will just be a major corridor for these lines going through, and they don't like it. I don't know that they made it over to say for their selves, but -- but it is a concern down in -- in our area, so. Our area south of Bottle Hollow.	Impacts from reasonably foreseeable future actions on the Region II area of concern (near Bottle Hollow) are disclosed in Chapter 5 of the Draft EIS. There is only one identified reasonably foreseeable future transmission line project for this area, the Energy Gateway South project. The area is question is not part of the Agency Preferred Alternative for either project.
Robidoux, J.	140-122	The amount of steel per tower should also be taken into consideration. Additional route length equates to additional transmission towers. According to the American Iron and Steel Institute, "the average high voltage transmission tower includes about 40,000 pounds of steel." I did not see in the DEIS an examination of the additional poundage of steel that would be required for the longer routes. The BLM should be well aware of the environmental impacts of the process of creating steel.	Actions are connected if they automatically trigger other actions that may require an EIS; cannot or will not proceed unless other actions are taken previously or simultaneously; or if the actions are interdependent parts of a larger action and depend upon the larger action for their justification (40 CFR 1508.25 (a)(i, ii, iii)). Upstream actions, such as creation of steel or other project facility material are not exclusively dependent upon this proposed transmission line, nor is this transmission line dependent exclusively on any project- specific material creation project, and therefore not connected actions to this transmission line. The impacts of these upstream actions are not within the scope of analysis of impacts resulting from the lead agencies' decisions regarding this project.
Robidoux, J.	140-123	consideration needs to be given to potential communities that could be adversely and unfairly impacted. For example, the way of life and quality of life in the Town of Baggs in Wyoming and the City of Craig in Colorado could be drastically altered by implementation of Region I- Alternative D. It should also be noted that Baggs would also be affected by the Baggs Alternative Connector.	Thank you for expressing your concerns related to the Draft EIS. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in the Final EIS. See the response to comment 125-99. With respect to possible effects to quality of life in and near the city of Craig, two major power plants, several transmission lines, coal mines and a rail line exist in the area. Thus, the development of an additional transmission line outside and beyond view of town boundaries is unlikely to drastically alter the quality of life in the communities referenced in the comment.
Ross, Jess	146-257	<p>After first learning of the Trans West Express Transmission line project in the Craig Daily News in July, I began to follow its development and am extremely pleased with the drafted Environmental Impact Statement (EIS) here at last.</p> <p>The EIS is a thorough explanation of the line stretching from Wyoming to Utah that stands to benefit our region in a variety of ways. You've done a fantastic job up to this point working with TransWest and other cooperating agencies to make this huge investment in valuable infrastructure a real possibility. However the time to close the deal has come. The numerous gains in communities across the country can only come to fruition once the EIS is finalized and right-of-ways are issued.</p>	Thank you for your comment.
Ryno, Lori	383-581	Thank you for your work to prepare the Draft Environmental Impact Statement for the TransWest Express project and to provide such detailed and appropriate environmental analysis.	Thank you for your comment.

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Ryno, Lori	383-583	The Final EIS section 3.1 on air quality and greenhouse gas emissions must include much more analysis and discussion of the enormous environmental benefits this project will provide in terms of reducing pollution and greenhouse-gas emissions, thereby improving air quality. This project is meant to primarily transmit clean wind energy. I read online that this project would help avoid literally millions of tons of carbon emissions generated by coal-based energy every year, because it will help ensure clean wind energy can be used instead of fossil fuels. The Final EIS analysis must make a qualitative attempt to demonstrate the actual environmental benefits of the project by reducing greenhouse gas emissions, which is easy to do, using tools such as this EPA calculator: http://www.epa.gov/cleanenergy/energy-resources/calculator.html If the TWE Project avoids about 8 million tons of CO2 every year, this calculator shows that is equivalent to over 18.6 million barrels of oil consumed, or 1.6 million cars taken off the roads, or the carbon sequestered by 205 million tree seedlings grown for 10 years. This kind of important, positive environmental impact and benefit must be included in the Final EIS in order to provide an accurate and complete disclosure of the projects impacts on air quality. I also think you should add that the TransWest project aligns with and advances the goals of HYPERLINK"http://www.doi.gov/news/speeches/2009_12_10_speech.cfm" the Department of the Interior and HYPERLINK"http://www.whitehouse.gov/the-press-office/2013/06/25/remarks-president-climate-change" the White House, which both have said that all strategies and projects that reduce greenhouse gas emissions and address climate change are vital.	The EIS discusses the potential for the Project to reduce GHG emissions. This potential depends on the source of the energy transmitted by the transmission line. The source of the transmitted energy is outside of the scope of this analysis and therefore, the level and amount of discussion are adequate.
Ryno, Lori	383-584	I believe this is a very thorough EIS document and the BLM and Western should finish their work as soon as possible and allow this project to proceed to construction right away. The secretary of the interior said in 2009, encouraging the production, development, and delivery of renewable energy is one of the Departments highest priorities. I have friends in the construction industry who have really suffered since 2009 with our recession, and I think by 2013 its time to act and let people start working to build this highest priority type of clean, renewable energy delivery project that will help the West in many ways.	Thank you for your comment.
Schmitt, Marjorie	148-133	The EIS discusses the number of structures impacted in each alternative – however, it does not address the number of potential structures on the privately owned land (closest to Alternative II-A). Many land owners have purchased raw land that they intend to place structures on.	The purpose of an EIS is to assess potential impacts to the existing natural and built environments. Potential impacts to private land have been disclosed by quantifying miles crossed by the Project ROW and/or estimates of acres disturbed by the Project. Determining the potential private construction that might occur on private land is speculative except in those cases where the landowner has submitted a proposal or plan for that work. Both Section 3.14 and Chapter 5 of the FEIS have been updated to account for impacts to, and cumulative impacts from, reasonably foreseeable projects planned or proposed on private land. Further, a subsection in Section 3.14.6.2 (Impacts Common to All) entitled "Residential and Other Built Environment" has been augmented to indicate that although it is not anticipated that occupied residences would be removed within the 250-foot-wide transmission line ROW under any alternative, the Project could occupy buildable areas of a property that preclude additional development or use.
Southern Nevada Water Authority	152-138	In May 2013, the Bureau of Land Management (BLM) issued a right-of-way (ROW) to SNWA to construct, operate, and maintain the Clark, Lincoln, and White Pine Counties Groundwater Development (GWD) Project (N-78803). The GWD Project consists of pipelines, power lines, and ancillary facilities to convey groundwater in southeastern Nevada. Additional ROWs will be requested for future groundwater production wells, collector pipelines, and distribution power lines. A more complete description of the GWD Project can be found in the project Plan of Development at: http://www.snwa.com/assets/pdf/ws_gdp_copd.pdf . The permitted GWD Project ROWs and areas identified for future ROWs lie within or are adjacent to the Proposed Project Alternative Route III-C in Nevada. SNWA would like to ensure this alternative, if selected, is compatible with the proposed locations for water pipelines, wells, power lines and additional facilities associated with the GWD Project (detailed maps and GIS shapefiles of the GWD Project can be provided by SNWA upon request). Therefore, SNWA requests that close coordination between SNWA, Trans West Express, LLC, and the BLM occur to ensure all facilities have the appropriate space needed for construction, operation, maintenance, and safety purposes.	The lead agencies require that TransWest coordinate with holders of valid existing rights that would be crossed by the Project. This comment letter has been provided to TransWest for their information and future coordination efforts.
Southern Nevada Water Authority	152-139	The Silver State Energy Association (SSEA) has filed an application and submitted an Environmental Assessment to the BLM Las Vegas Field Office for the construction, operation and maintenance of the Eastern Nevada Transmission Project; two separate 230-kV overhead transmission lines (Gemmill-Tortoise and Silverhawk-Newport) located in Clark County, Nevada (N-86357).	The two Eastern Nevada Transmission Project transmission lines were added to the cumulative impacts analysis in Chapter 5 of the Final EIS.

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Southern Nevada Water Authority	152-140	The following Proposed Project components overlap with the alignment of the Eastern Nevada Transmission Project: Alternative Route III-C, Meadow Valley 2 Potential Ground Electrode Overhead Electrical Line in Region III, Applicant Proposed/Agency Preferred Route IV-A, Alternative Routes IV-B and IV-C, and Sunrise Mountain Alternative Connector in Region IV. For this reason, close coordination is necessary between the SSEA, TransWest Express, LLC, and the BLM to make certain all facilities for both projects have the appropriate space needed for construction, operation, maintenance, and safety purposes.	The two Eastern Nevada Transmission Project transmission lines were added to the cumulative impacts analysis in Chapter 5 of the Final EIS.
Southern Nevada Water Authority	152-141	Figures 5-5 and 5-6 in Chapter 5 Cumulative Impacts require the addition of the two Eastern Nevada Transmission Project transmission lines (GIS shapefiles can be provided by SNWA upon request).	The two Eastern Nevada Transmission Project transmission line locations were added to the cumulative impacts analysis in Chapter 5 of the Final EIS.
Southern Nevada Water Authority	152-142	Miscellaneous Water and Transmission Projects SNWA and its member agency, the Las Vegas Valley Water District, operate and maintain several existing water and/or transmission projects within the Muddy River Springs Area in northern Clark County, Nevada and within the Henderson area in southern Nevada. There may be local routing conflicts between these existing projects and the Meadow Valley 2 Potential Ground Electrode Overhead Electrical Line in Region III, Applicant Proposed/Agency Preferred Route IV-A, Alternative Routes IV-B and IV-C, and various Alternative Route Connectors in Region IV. Close coordination between SNWA, Trans West Express, LLC, and the BLM is required to ensure any routing conflicts in these areas are resolved prior to final design and construction of the Proposed Project.	The BLM contacted SNWA for all water and transmission projects shapefiles; however the location of some projects is confidential and not releasable outside of SNWA. The lead agencies require that TranWest coordinate with SNWA during project siting to ensure conflicts are resolved prior to construction of the proposed Project.
Southern Nevada Water Authority	152-143	SNWA has existing ROWs from the BLM for groundwater monitoring and testing wells that overlap with or are adjacent to the Proposed Project Alternative Route III-C in Lincoln County, Nevada. These facilities are part of ongoing regional groundwater monitoring and are visited at least quarterly to collect data. Access to these facilities uses existing roads through this alternative route, and therefore, if selected, would need to allow for continued access to these well facilities during and following construction activities.	The BLM consulted with SNWA in February 2014 to identify existing and proposed infrastructure that could be affected by the Project. However, some existing SNWA facilities within the Project area were determined by SNWA to be critical infrastructure for which data is confidential and cannot be released in any form. SNWA indicated that TransWest will need to coordinate prior to final design and construction to ensure that access is not impinged. Section 3.14, Land Use has been augmented as appropriate to identify and analyze impacts to SNWA facilities and discuss the need for additional on-the-ground coordination prior to final design. Mitigation measure LU-1 has been added to ensure that approvals for this project do not interfere with access to nearby valid existing uses and rights.
Spaulberg, Olivia	153-145	Since it is not secret that other transmission lines are planned for the area, thought should be given to potential impacts from other projects.	Comment noted. The impacts of reasonably foreseeable future transmission lines affecting the same resources as the Project are disclosed in Chapter 5 of the Draft EIS.
Sperry, Mike	451-526	It would be wonderful if there were more detailed maps provided to people at these meetings.	Comment noted. Because of the size and scope of the project area, the BLM provided the meeting attendees with computer access to GIS files of the project routes overlaid over satellite photo imagery and resource datasets in lieu of site-specific maps during the public meetings. This allowed the public to view the project at a variety of scales, which would not have been possible with printed maps. These GIS files were also posted on the BLM project website for access outside of public meetings. The BLM also provided printed copies of oversized maps of key resource data from the Draft EIS for viewing during the meeting.
State of Nevada - Dept of Transportation	652-967	Currently, your project will intersect Nevada Department of Transportation (NDOT) right-of-way in multiple locations. NDOT is particularly concerned with the impact of the project on the Boulder City Bypass (Bypass) which is currently under construction. The Bypass is being constructed subsequent to a Final Environment Impact Statement (FHWA-EIS-00-02-F) and Record of Decision signed December 8, 2005. NDOT and the Federal Highway Administration (FHWA) have already begun construction of Phase I of the Bypass. This phase runs from the Foothills overpass to US 95 about 1.2 miles south of the existing US93IUS95 interchange. According to the TransWest DE IS, the Applicant Proposed/Agency Preferred Alternative TV-A would intersect Phase I just south of the Foothills overpass at Railroad Pass. Final design for this segment of Phase I is complete and existing transmission lines have already been relocated. No specific accommodations for new transmission facilities have been considered as part of the Phase I design. Based on the presented alternatives, Alternative IV-A would have the least impacts of the alternative routes presented. Of the other considered connector alternative routes, the Railroad Pass Alternative Connector (Segment [D 780]) may present challenges to both projects as it crosses the Bypass in an area where there will be several above grade highway structures.	Thank you for your comment. The lead agencies have informed TransWest of the need for coordination with the Bypass project. Chapter 5 of the FEIS was revised to analyze the cumulative impacts of the TransWest and Bypass projects, as well as other past, present, and reasonably foreseeable future actions.
State of Nevada - Dept of Transportation	652-968	Design and construction of Phase 2 is being coordinated with the Western Area Power Administration (Western) where the planned Bypass parallels and crosses Western transmission facilities at numerous locations along its 12 mile length. As part of the Bypass project, the RTC is entering into agreements for the relocation of existing transmission facilities by Western and by the Colorado River Commission (eRe) which are in conflict with the horizontal and vertical alignment of the Bypass. Alternative IV-C paralleling the Western transmission corridor east of Boulder City, evaluated in the DEIS but not designated as the Agency Preferred alignment, would require coordination with the US 93 Bypass Phase 2 project to provide continuity of design with both the Bypass project and the planned Western and CRC transmission facility relocations associated with the Bypass project. Alternatives IV-B may also provide potential conflicts with Phase 2.	Thank you for your comment. The lead agencies have communicated the need for this coordination to TransWest. TransWest will be required to coordinate with the Bypass project if an alternative affecting that projects is picked in the Record of Decision.

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Commenter Name	Comment ID	Extracted Comment	Response
State of Nevada - Dept of Transportation	652-969	Your timeline indicates a 2014-2016 construction period. This timeline coincides with construction activities of both phases of the Bypass project and will require further coordination between all parties in the very near future.	Thank you for your comment. The lead agencies have notified Transwest of the need to coordinate with the Bypass project and Chapter 5 of the FEIS was revised to disclose the potential cumulative effects of this project and the TWE Project.
State of Nevada - Dept of Transportation	652-970	With regards to TransWest Express impacts to other NDOT right of way it appears the transmission line will pass through, along side of or within NDOT right-of-way at multiple locations. Based on the level of detail presented in the DEIS it cannot be determined where these direct impacts would occur. Wherever the project will require the use of NDOT right-of-way for either temporary construction activities or new or modified permanent transmission facilities, an encroachment permit will be required. Contact the NDOT District I office in Las Vegas, NV (702-385-6500) to apply for this permit. No use of NDOT right-of-way is authorized until an encroachment permit has been processed and approved.	The need for NDOT and other State DOT coordination and permitting is discussed in Section 3.16.2.1 of the Final EIS.
State of Nevada - Dept of Transportation	652-971	Additionally, as needed, appropriate Oversize/Overweight Permits should also be obtained.	Section 3.16.2.1 of the Final EIS has been revised to include information regarding the need for Oversize/Overweight permits.
State of Utah-Public Land Policy Office	581-890	TransWest Express is a proposal to design and construct a direct current (DC) transmission line to carry electrical energy from generation sources in Wyoming to users in the desert southwest. Though the project offers Utah relatively minor economic benefits, such as short-term construction jobs and property tax revenue, it will not serve the electrical growth needs of the state directly. As such, the actual site of the line is vital, as the line will reduce the already established transmission corridor capacity within Utah which may eventually be used to serve the increasing electrical load needs of Utah. At a minimum, the line must not interfere in any manner with other economic generators which do contribute to the state's revenue and economic growth as it winds its way through Utah.	Both the Draft and Final EISs include analyses of a range of alternatives to address the tradeoffs between impacts to natural resources and human uses. These include alternatives to address impacts to state and private vs. federal lands, as well as potential impacts to socioeconomics from project implementation in Utah (See Section 1.8.2 of the Draft EIS). Your concerns regarding impacts to economic generators that contribute to Utah's revenue and economic growth will be considered as the lead agencies make their decision on which alternative will be implemented.
State of Utah-Public Land Policy Office	581-892	In this light, the state is very concerned about the BLM's proposal to choose a construction corridor in accordance with the Agency Preferred Alternative in the portion of Region II just north of the Intermountain Power Plant (IPP), within Millard County, Utah. As discussed further below, this alignment would have huge effects upon other projects within the region, without providing any significant environmental protection in return. In addition, the state requests BLM work with Utah to assure that the provisions of the siting proposal which may affect the state's Sage-Grouse Management Areas, particularly the Strawberry Sage-Grouse Management Area, are consistent with the letter and spirit of the Utah Conservation Plan for Greater Sage-grouse, adopted in April of 2013.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
State of Utah-Public Land Policy Office	581-893	In spite of the care with which the applicant worked to find a route which minimizes effects on the environment and other economic activities, the BLM is proposing a preferred alternative, in the region near the IPP plant discussed above, which deviates from the applicant's alternative, and which would have huge economic impacts without any significant environmental protections. Unfortunately and improperly, the DEIS does not give any reason for this deviation. The DEIS is therefore in violation of the hard look requirements of NEPA on this point.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input such as yours. This agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in Chapter 2 of the Final EIS.
State of Utah-Public Land Policy Office	581-894	The state understands from other sources that this deviation is proposed in order to minimize impacts to the environment due to drifting sand, unstable soils, recreational use on sand dunes in the area and a (vague) reference to congestion. In response, the applicant asserts that the approved applicant preferred corridor contains sufficient flexibility to allow micrositing designed to avoid the very small amount of sand found within the corridor. In addition, specialized work methods, such as helicopter-aided construction, allow localized soil conditions to be addressed. Finally, new reliability standards set forth by the governing body, the Western Electricity Coordinating Council, allow better co-location possibilities by allowing this line to be built 250 feet away from other major power lines.	The lead agencies are considered your input in their reassessment of the Agency Preferred Alternative in the Final EIS. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input such as yours. This agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in Chapter 2 of the Final EIS.
State of Utah-Public Land Policy Office	581-895	In light of the readily-available solutions to the BLM's unexplained and undiscussed concerns about the applicant's preferred alternative in the vicinity of the IPP, the state asks the BLM to abandon its preferred alternative in this area because of the huge impact the agency alternative would have upon economic projects within the area.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
State of Utah-Public Land Policy Office	581-896	The agency-proposed routing first traverses lands leased by School and Institutional Trust Lands Administration (SITLA) to ECG Solar I, LLC (ECG Solar) for the development and construction of a 300 MW photovoltaic solar electric generation facility. This project has completed initial biological studies, is in the queue for interconnection agreement, and is in the final stages of county-level permitting. Upon completion, it would provide a substantial operations commencement bonus to the school trust, as well as percentage rentals on electric generation. The agency-proposed routing for the TransWest line would eliminate photovoltaic panels in the entire transmission corridor, cause insolation losses to panels located outside the corridor, and potentially might cause loss of the entire 300 MW project if the routing made financing or power purchase agreement negotiations more difficult in comparison to other competing projects.	Thank-you for your comment. Section 3-14 of the Final EIS was revised to evaluate the direct and indirect impacts of the TWE Project on the ECG solar project.
State of Utah-Public Land Policy Office	581-897	The second project on school trust lands that would be negatively affected by the agency-preferred alternative is the Magnum Western Energy Hub (WEH) project. The WEH is based on a distinctive geologic structure, a Gulf Coast style salt dome, which is the only known asset of its kind in the Western United States. Within this salt dome, a sizable underground storage cavern can be constructed to store natural gas liquids, natural gas, petroleum, and can be used to develop Compressed Air Energy Storage. Such storage directly supports the development of renewable resources by functioning as a mechanical battery to store energy. Magnum has leased over 4,000 acres of school trust lands from SITLA for development of this project. The state fully supports projects like the WEH which support the development, production, and efficient use of Utah's energy resources and could supplement the generation of renewable or traditional energy on-demand. The first phase of this project is currently under construction. It consists of a rail spur and associated truck and loading facilities, three (3) million barrels of underground salt cavern storage for natural gas liquids in two dissolved salt caverns, a 160 acre brine storage pond, and many ancillary facilities. The agency-preferred alternative not only bisects the current phase of the WEH project, but would also encumber future development of the leased lands for future project phases. Magnum is fully permitted by the Federal Energy Regulatory Commission (FERC) for construction of four natural gas storage caverns with a total capacity of 54 BCF of natural gas, and the site holds substantial promise for location of gas-fired electric generation, salt cavern storage of compressed air for energy storage, and other uses. The state notes that the BLM was a participant in the FERC permitting process for Magnum WEH, and thus was aware of the proposed locations of Magnum facilities that would be impacted by the agency-preferred routing directly through the middle of the Magnum project. In addition, this issue was raised on several occasions throughout the scoping period and is mentioned in the TransWest Express Transmission Project Scoping Summary Report on pages A19, A21, and A22. Furthermore, BLM issued a Right-of-Way for Magnum to build the header pipeline from Delta to Goshen, Utah (February 2011).It is unfathomable that the DEIS does not contain any references to such a notable and fully permitted project as the WEH.	The Draft EIS did analyze the cumulative impacts of the TWE Project and the Magnum Gas Storage Project (See Table 5-8 of the Draft EIS). Section 3-14 of the Final EIS was revised to include the potential impacts of the TWE Project on the Magnum Gas Storage Project.
State of Utah-Public Land Policy Office	581-899	The state has developed, has adopted and is implementing the Conservation Plan for Greater Sage-grouse in Utah. The plan has identified eleven Sage-Grouse Management Areas (SGMAs) in order to focus conservation efforts. The DEIS states that TransWest Express will calculate mitigation for impacts to sage-grouse from the construction, operation, and maintenance of the project using Habitat Equivalency Analysis (HEA) (See page 3.8-60). It is unclear whether this HEA framework is comparable to the mitigation measures set forth in Utah's Conservation Plan. The state encourages BLM to adopt a route that avoids or minimizes impacts to greater sage-grouse where possible. If a route is chosen which traverses an SGMA, the applicant must work with the state to develop mitigation measures which are consistent with the state's conservation plan.	Mitigation measure SSWS-5 provides details of measures that would apply to sage grouse and their habitat throughout the TWE analysis area. This measure was developed in coordination with the Utah BLM State office and ensures compliance with the recent Conservation Plan for Greater Sage-grouse in Utah. Additional compensatory mitigation for impacts to sage-grouse habitat will be identified in coordination with federal and state wildlife management agencies and local governments following completion of the HEA process. The lead agencies also acknowledge the BLM and USFS greater sage-grouse land use plan amendments and associated NEPA processes currently underway for Utah and other portions of the TWE analysis area. Avoidance, minimization, and mitigation measures for greater sage-grouse will, at a minimum, conform to approved land use plan stipulations in place at the time of the TWE ROD.
State of Utah-Public Land Policy Office	581-900	In addition, the DEIS erroneously omits SITLA as a permitting agency in Appendix A, Table A-1, page A-5. SITLA has sole right-of-way permitting authority for school trust lands under the Utah Trust Lands Management Act, Utah Code Section 53C-1-101 et seq. The Utah Division of Fire, Forestry and State Lands (noted in Table A-1 as the permitting authority for rights-of-way on Utah state lands) has no legal authority over school trust lands.	Appendix A of the Final EIS has been updated to incorporate the information you provided.
State of Utah-Public Land Policy Office	581-901	Finally, the BLM must consider and meet the requirements of Section 2815 of the Defense Authorization Act of 2000 with respect to any plan amendments necessary in the vicinity of the Utah Test and Training Range. The state was unable to find any discussion of the issue within the DEIS.	None of the potential routes identified in the TransWest Express Transmission Project EIS would affect this area; therefore, no plan amendments have been proposed.
State of Utah-Public Land Policy Office	581-902	At this time, BLM's proposed routing in the area discussed above is arbitrary, capricious, and presumptively in violation of law due to the FERC-permitted status of the Magnum project and BLM's own agreements. The state looks forward to working with BLM to assure that the final decision resolves the above concerns, and is consistent with state law, plans, policies and programs, as required by federal law and regulation.	Thank you for your comment. If approved, the Final ROW grant for the project will conform to all applicable federal and state laws and regulations, including BLM requirements for the ROW grant to consider and coordinate with landowners and holders of valid existing rights crossed by the project.

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Commenter Name	Comment ID	Extracted Comment	Response
Steele, Robert L.	452-529	I'm a landowner up Nephi Canyon called Hope Creek Hideaway. The corridor at the present time that comes right down through the property and right down between the two corridors that's already formed up there, and it is actually totally unacceptable, period. Okay? If the corridor was to go above the Hope Creek area and go over on to the south side of the canyon on the south corridor -- it's already established -- it would be acceptable to me. It does go across some private land, but there is nothing there. Our land is all totally developed into a large campground. Below me is the Ockey farm and the High Mountain. So the corridor at the present site that they have would go right down through his property, our property, and right down through another group of private lands too that's is developable property at the present time. But on the south side, south of the south corridor, it's pretty much all Forest Service land. There is some private land they've got to go across, but there's no development whatsoever along that system, and it would then be, I think, acceptable to probably all of us. So it's relatively easy to go on south of the south corridor and across the canyon above our developed properties and it would actually be a shorter route or as short as the route that's proposed. In all honesty, it would be way, way cheaper for the people that's doing this TransWest Express. It would be way cheaper for them to go that way and way better for all of us people that's involved. This other one you'd have to condemn the land to take it. Condemnation isn't a very nice thing especially when there's alternate routes, so we don't want to get into that. The campground has hundreds of people a year that come in to the campground, church organizations and all kinds of people, so it would be real mistake for them to go ahead and figure on coming down through those properties. Like I said, over on the south corridor, if they go over -- across, above us, and on to the south corridor, right in that area there's no developed property, period. So it would be a lot cheaper for them to go that way and a lot better for everybody. And I know it's going to have to go. The lines are coming through, and we just want it to go in the right place. And we'll support it if it goes in the right place.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach. In their selection of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Your concerns are being considered by the lead agencies as they review project impacts in the Final EIS and make their decision on which alternative to implement.
Stocks, Kristin	693-1858	The Ely RMP contains management action LG-1, which states Make approximately 11,246,900 acres and 5-15,267 animal unit months available for livestock grazing un a long-term basis. This Board would stipulate that Agency Preferred 111-B, and the alternate 111-C are inconsistent with the Ely RMP, particularly due to proposed reductions in AUMs (both short-and long-term) as a result of the project that is outside of utility corridors identified in the Ely RMP, and in light of the deficiencies pointed out in the cumulative impact assessment.	Potential reductions in forage are estimates based on an average AUM per allotment, resulting in a conservative estimate of impacts for the EIS. The decision to adjust permitted AUMs is out of the scope of this document. The proposed Project and associated surface disturbance would maintain compliance with the RMP requirements, including any potential impacts to AUMs. Consultation on site-specific impacts, tower siting, allotment/pasture fencing to minimize impacts from the proposed Project, are proposed to occur under Range-1 and during the POD process.
Stocks, Kristin	693-1861	Require adequate mitigation for any impacts to existing range improvements and private property based on advance consultation with the permittees. Such mitigations could include, but should not be limited to: <ul style="list-style-type: none"> - Avoidance of critical forage and infrastructure; - Minimizing temporary and permanent disturbance-or developing within previous disturbance areas (i.e. along existing county roads, or along the allotment boundary alignment); - Disclosing rehabilitation efforts and any proposed livestock exclusions; - Relocating water developments and infrastructure; - Repairing or installing fencing and/or placement of cattle guards; and - Requiring off-site mitigation within impacted allotments that compensates for AUMs lost due to disturbance in the new right-of-way. Such mitigation might include: <ul style="list-style-type: none"> • Maintenance of existing seedings; • Maintenance of existing pinyon-juniper chainings; • Pinion-juniper treatments that increase forage production, and reduce fuel loading, particularly in areas where pinion and juniper has expanded into perennial grass-shrub ecological sites; and • Maintenance of existing county roads and project-created roads. 	Livestock grazing mitigation Range-1 requires consultation with the BLM Field Office, and the grazing permittees to determine site-specific impacts from construction activities. Site-specific corrective actions would be determined as part of the consultation. The mitigation has been updated to include suggested examples of corrective actions including route siting to minimize impacts from construction and operation disturbance. The mitigation has been updated to include operation impacts in addition to construction activities.
Stocks, Kristin	694-1852	Another concern for me is that in the Draft EIS on page 3.3-41 it states that Alternative I-A and I-B would have the least overall impact on soil resources, yet, John Farr says in the article that D has "less erosion", this seems to conflict.	Overall impacts to soil resources take numerous soil characteristics and limitation factors into account - soil erosion is only one of the factors considered. Therefore, although one alternative may have "less erosion," overall limitations may be higher for that alternative.
Sweetwater County Wyoming	195-708	The Sweetwater County Comprehensive Plan-2002 calls for Sweetwater County to: "Recognize and protect the County's unique cultural, recreational, environmental and historic resources"; and to "Identify and protect the County's unique cultural, recreational, environmental and historical resources." To meet the intent of this goal, Sweetwater County encourages the BLM to select preferred alternatives that avoid or minimize impacts to the following features: Adobe Town, Haystacks, Willow Creek Rim, Powder Mountain and the Overland and Cherokee Trails.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.

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Commenter Name	Comment ID	Extracted Comment	Response
Sweetwater County Wyoming	195-710	Within Sweetwater County, the municipalities that will potentially receive direct and cumulative socio-economic impacts from the Project include the Cities of Rock Springs and Green River and the Towns of Wamsutter, Superior and Granger. The County unincorporated communities that may receive these impacts include Point of Rocks, Farson and the unincorporated communities surrounding the Cities of Green River and Rock Springs. Sweetwater County encourages Trans West, the BLM and the State of Wyoming to work with these communities to ensure they have sufficient resources to address and mitigated potential socio-economic impacts.	Given the available information provided for the EIS analysis, the potential for socioeconomic effects to communities in Sweetwater County, other than Wamsutter, and to the county (as a political entity and service provider) appear limited given the location and alignment of the alternative corridors in the eastern portion of the county.
Sweetwater County Wyoming	195-711	<p>It is important to emphasize that Sweetwater County supports the TransWest Project. To ensure that the Project occurs in a manner that balances economic opportunity with the ability of our communities to absorb socioeconomic impacts, Sweetwater County encourages Trans West, the BLM and the State of Wyoming to carefully inventory the socioeconomic impacts of all the industrial projects that are planned to begin construction during the construction phase of the Trans West Project.</p> <p>Some of the potential projects which may begin during the TransWest construction time frame include Gateway West and Gateway South Transmission Line Projects, Chokecherry/Sierra Madre Wind Energy Project, multiple oil and gas expansion projects like NPL, Moxa Arch, Hiawatha, Continental Divide, La Barge Platform, and industrial developments including Simplot's Ammonia Plant and the FMC Granger Optimization Project.</p> <p>Even though it is uncertain how many projects will be constructed simultaneously with the Trans West Project, it is essential for all involved to carefully monitor the cumulative socio-economic impacts related to these projects and be prepared to implement a plan that has the financial backing to address any potential community impacts. Potential community impacts that are of concern to Sweetwater County include fire protection, law enforcement, housing, schools, roadways and other community services.</p>	It is difficult to provide an accurate quantitative estimate of the cumulative effect of the referenced projects due to the uncertainty of when they would actually be constructed and how much overlap would occur in that construction and operation. However, Section 5.3.17 of the Final EIS was revised to provide a detailed qualitative description of these potential cumulative impacts based on reasonable assumptions. Please note that each separate project has the responsibility for determining the appropriate mitigation for socioeconomic impacts resulting from that project. Developing and requiring mitigation for these projects is outside of the scope of the lead agencies' decision for the TWE Project.
Sweetwater County Wyoming	195-713	Depending on the Alternative Route selected by the BLM for this project, the proposed transmission line may cross many miles of public and private checkerboard ownership within Sweetwater County. Considering this, the County encourages the BLM to support Federal, State and County governments in applying their permitting processes to the entire project area including both public and private checkerboard lands. This will ensure that Federal, State and County regulations are applied in a uniform manner across ownership eliminating confusion in the permitting process.	The lead agencies' supports the application of all relevant and required permitting processes, including Federal, State, and local. The BLM does not have the discretion to determine the jurisdiction for the application of those permitting processes. They have already been mandated by law and will be implemented accordingly.
Sweetwater County Wyoming	195-714	The attached Comment Table revises Table A-1 found in Appendix A on Page A-4 of the DEIS. This Comment Table lists the Permits and Authorizations that are required by Sweetwater County. In this Table, the strikeout text removes the DEIS text that is inaccurate and the yellow highlighted text adds corrective or additional language that clarifies Sweetwater County's permitting and development requirements. (see original letter Page 4 of 4 for additional information)	Suggested edits have been made in Table A-1, Appendix A.
Techren Solar, LLC	616-924	<p>The Southern Terminal is the preferred alternative in the DEIS. Transmission lines for the Techren solar facility cross a portion of TransWest's Southern Terminal Alternative. While Techren believes that these transmissions lines are not in conflict with the Southern Terminal, TransWest has indicated that it has concerns over the placement of the Techren transmission lines over the Southern Terminal. In a letter to the BLM dated September 27, 2013 (Exhibit 1 hereto), TransWest proposed to relocate the Southern Terminal to the south of its position as indicated in the DEIS (DEIS Figure 2-17), asserting that the repositioning of the Southern Terminal will provide a sufficient buffer between the approved Techren transmission line and TransWest's facilities. The newly Proposed TransWest Southern Terminal Site is illustrated in Exhibit C to Trans West's September 27 letter.</p> <p>Technm supports Trans West's relocation of the Southern Terminal and requests, should the BLM approve the TransWest project, that it approve the relocation of the Southern Terminal as proposed in Exhibit C of Exhibit 1.</p>	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1459	We recognize the potential benefits of TWE in supporting renewable energy development and meeting our nation’s growing energy demands. There are opportunities along much of the route to follow existing transmission lines and roads, which we strongly support as a general practice. Unfortunately, even if TWE follows existing infrastructure, there will be significant impacts to numerous important resources and values along the 725-plus mile route. For this reason, it is critical that, if TWE is approved, it follows a route that has the lowest impacts, and that the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) include a robust on and off-site mitigation program detailing the mitigation obligations of the Bureau of Land Management (BLM), Western Area Power Administration (Western), the Forest Service (FS), and the project proponent, TransWest Express LLC (TransWest).	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS.
The Wilderness Society	164-1461	We may be able to support a low-impact route in the future, but that support will be contingent on (1) obtaining segment-specific information on impacts, (2) the completion and synthesis of sage grouse recovery plans, (3) micro-siting adjustments being made to the route to better limit impacts and other avoidance and minimization measures, and (4) written commitments to meaningful on and off-site mitigation in the ROD.	Thank you for your comment.
The Wilderness Society	164-1462	We submit these comments in the hope that stakeholders can jointly do the following: 1) analyze the need for the project in light of renewable energy development opportunities proximate to load centers; and 2) identify a TWE route that avoids, minimizes and effectively mitigates impacts to the environment and communities traversed by the line. Principles underlying “Smart from the Start” dictate an assessment of the need for the project.	Thank you for your comment. The proposed action is not a BLM- or Western-generated action. TransWest submitted a request to the BLM for a ROW across public lands in order to build a transmission line. As stated in Chapter 1 of the Draft EIS, the BLM's purpose and need is to consider the ROW application in accordance with 43 CFR Part 2800. The EIS process discloses the environmental effects of granting that ROW, including an analysis of alternatives to the proposed route across federal lands.
The Wilderness Society	164-1464	A number of our groups proposed alternate routes as part of the scoping process. We encourage BLM, WAPA and the Applicant to continue to consider these routes through the NEPA process.	All alternatives proposed during scoping were considered for inclusion in the EIS. Section 2.7 of the Draft EIS provides rationale those alternatives that were eliminated from detailed analysis.
The Wilderness Society	164-1465	Our organizations note that the manner in which data is presented in the DEIS, mostly by entire Alternative routes rather than segments, made comparisons challenging (see Section VIII for additional information). Our organizations strongly encourage this information be made available for all segments in the FEIS, to improve selection of a route with the least amount of resource impacts.	The TWE DEIS provides analysis at the alternative level to provide clear disclosure and comparison of alternative impacts. Analysis at the segment level does not provide a comparison of the relative impacts of each complete alternative. To address your concern, the disturbance impacts by segment was provided in an appendix to the Final EIS.
The Wilderness Society	164-1467	For phased build-out options 2 and 3 given market conditions, TransWest contemplates constructing either the northern or the southern section with AC lines and linking them to a shorter section of DC. Recommendation: Should option 2 or 3 be deployed, the Agencies and TransWest should analyze opportunities to upgrade existing AC transmission lines and pursue upgrades instead of building new lines wherever possible to limit impacts.	Upgrades to existing transmission facilities would require TransWest and the other transmission owner/operator to enter into an agreement to provide for joint construction, operation and maintenance of the facility. There are no such agreements in place or contemplated at this time. Therefore, the upgrade of existing transmission facilities is speculative at this time and has been eliminated from further analysis.
The Wilderness Society	164-1471	The FEIS must include a mitigation program that fully addresses impacts to wildlife habitat, Lands with Wilderness Characteristics, and other resources and values. We appreciate that the Agencies and TransWest have committed to a significant number of mitigation measures intended to avoid and minimize impacts. (DEIS Appendix C) While avoidance and minimization are critical first and second steps in the hierarchy, off-site, compensatory mitigation for unavoidable impacts is also necessary. Unfortunately, the DEIS is wholly inadequate in terms of off-site mitigation. In fact, as far as we can tell, the DEIS does not commit to or analyze any specific off-site mitigation for TWE.	The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The applicant has committed to developing off-site compensatory mitigation to address potential impacts to the greater sage-grouse. Details regarding this are summarized in section 3.8.6 and Appendix J. The BLM will make a determination if further compensatory mitigation is necessary for other resources, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS.
The Wilderness Society	164-1472	While there are references to possible future mitigation measures which might be detailed in the Construction, Operation, and Maintenance (COM) Plan that could potentially include off-site mitigation, there are no commitments in the DEIS. For example, Applicant-Committed Design Feature TWE-5 states, “The COM Plan will display the location of Project infrastructure (i.e. towers, access roads, substations) and identify short-term and long-term land and resource impacts and the mitigation measures that will be implemented for site-specific and resource-specific environmental impacts.” (DEIS Appendix C, p. C-15 (emphasis added)) Applicant-Committed Design Feature TWE-29 states, “The COM Plan will include a Biological Protection Plan, which will identify important, sensitive, or unique habitats and BLM sensitive, USFS sensitive, and state-listed species in the vicinity of the TWE Project. The COM Plan will identify measures to be taken to avoid, minimize, or mitigate impacts to these habitats and species.” (DEIS Appendix C, p. C-17) It is our understanding that TransWest plans to develop the COM plan only after the FEIS is published and the ROD is signed.	The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS. Although the COM Plan will be developed post-ROD, it will be required to conform to all applicant committed measures, proposed mitigation measures, stipulations, and design features described in the Final EIS and approved in the ROD.
The Wilderness Society	164-1473	Appendix C of the DEIS also includes a list of “Additional Mitigation Measures Prescribed for the TWE Project” which are organized by impacted resource. Again, these mitigation measures postpone determination of specific off-site mitigation measures. For mitigation measure SS-1, (Species-specific Surveys for Federally-listed Species), Appendix C states, “For species that cannot be avoided, species specific mitigation would need to be developed in consultation with the USFWS and BLM. Species specific mitigation may include compensatory mitigation, and transplanting of individuals.” (DEIS Appendix C, p. C-124).	Thank you for your comment. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the ROD.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1477	<p>One of the first and most important steps to avoid as many impacts as possible to sensitive resources is to plan potential transmission corridors so that they are developed within existing corridors, ROWs, brownfields and other degraded lands, and other areas with co-locating opportunities. Equally important is planning to avoid lands within the categories listed below that are either statutorily protected from development such as transmission and those that should otherwise be avoided: 1. National Park Service designated lands; 2. National Wildlife Refuges; 3. National Monuments; 4. Wilderness Areas; 5. Wilderness Study Areas (WSAs); 6. National Conservation Areas; 7. Other lands within BLM's National Landscape Conservation System (NLCS), such as Outstanding Natural Areas; 8. National Historic and National Scenic Trails; 9. National Wild, Scenic, and Recreational Rivers, study rivers and segments, and eligible rivers and segments; 10. Riparian areas, wetlands, and significant washes; 11. Threatened, endangered, candidate and sensitive species habitat, as well as critical core and linkage areas for wildlife habitat; 12. Lands with known occurrences of threatened, endangered, candidate and sensitive species 13. Lands previously acquired or preserved for conservation purposes; 14. Areas of Critical Environmental Concern (ACECs); 15. Special Recreation Management Areas (SMRAs) (depending on the extent to which the impacts of a line could compromise the resources that the SRMA was designated to protect); 16. Citizen-proposed wilderness areas; 17. Other lands with wilderness characteristics (LWC), including but not limited to BLM-identified lands with wilderness characteristics managed to protect those resources and BLM-identified lands with wilderness characteristics not managed to protect those resources; 18. Traditional Cultural Properties; 19. Sacred sites; 20. Important Bird Areas (IBAs) 21. Lands that have been identified as having biological, cultural, and/or historical significance through federal, state and local planning efforts 22. Other lands protecting wildlife with a conservation easement funded in part by a state agency (including Colorado Parks and Wildlife) In February 2007, the Western Governors' Association (WGA) established its policy to protect wildlife migration corridors and crucial wildlife habitat in the West. Depending on the wildlife and landscape, transmission can contribute to loss, fragmentation, and diminished resiliency of these habitats. Consequently, planning and siting to avoid or minimize impacts to the wildlife corridors and landscape connections is very important.</p>	<p>Potential resource impacts from the Project (including biological, cultural, visual, land use, and special designations) are disclosed in Chapter 3 of the Draft EIS.</p>
The Wilderness Society	164-1478	<p>Siting: Avoiding sensitive resources can also be achieved during the siting of actual transmission ROWs within the proposed corridors. Although many of the specific comments below are based on the two-mile analysis corridor, we are aware that the actual ROW corridor will be narrower (likely 250' in most places) if the application is approved. This approach to avoidance will be particularly important when transmission line ROWs are planned near sensitive habitats for species of concern including the following: - endemics with restricted distributions such as the Burrowing Owl - migratory birds protected under the Migratory Bird Treaty Act with unique critical habitat requirements, including Mountain Plover- Endangered Species Act (ESA)-listed or candidate species such as Greater Sage-Grouse and Desert Tortoise, for which preserving high-quality reintroduction habitat is essential; - relatively widely distributed but uncommon species of conservation concern whose habitat coincides with areas likely to be developed, such as raptors including Golden Eagle (Aquila chrysaetos) protected by the Bald and Golden Eagle Protection Act (BGEPA) and Ferruginous Hawks; and - wide ranging, relatively common species sensitive to habitat fragmentation and disturbance, such as American pronghorn (Antilocapra americana), mountain lion (Puma concolor), black bear (Ursus americanus), mule deer (Odocoileus hemionus), and elk (Cervus elaphus). Avoiding impacts during siting will require a great deal of geospatial data on the locations of the protected and sensitive lands and species. The quality and availability of these data will vary considerably across the extent of the proposed TWE project. Some regional and state-based data sets will assist with this fine-scaled siting work but many of those are mostly focused on public lands or are incomplete. The absence of data from private or tribal lands does not necessarily indicate the absence of sensitive resources. Consequently, actual on-the-ground surveys consistent with guidelines provided by the US Fish and Wildlife Service (USFWS) or state wildlife agencies should be required before ROWs are finalized and construction begins. Recommendation: TWE should avoid any of the lands included under the categories listed above. The most accurate, up-to-date geospatial and wildlife data and the most current scientific and other formal guidance must be used to avoid impacting sensitive resources during establishment of the ROW and during actual construction. In addition, we recommend that the Agencies follow the state-by-state guidance below to avoid or minimize additional impacts.</p>	<p>Comment noted. Impacts to American pronghorn, mountain lion, black bear, mule deer, and elk and migratory birds are discussed in section 3.7.6. Impacts to special status raptor species, greater sage-grouse, and desert tortoise are discussed in section 3.8.6. Species-specific surveys on the selected right-of-way will be conducted prior to final engineering and the NTP ROD. The lead agencies acknowledge that special status species can occur on private and tribal lands for which there may be a lack of data. The lead agencies have also made efforts to utilize up-to-date geospatial and wildlife data and the most current scientific and other formal guidance to avoid impacting sensitive resources during establishment of the ROW.</p>

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1479	The Agencies should require and approve species-specific and site-specific construction plans to avoid, minimize and effectively mitigate impacts to sensitive resources. The Agencies should require minimal construction of access roads and ROWs to reduce disturbance, establish speed limits on access roads, require stringent control of invasive species, and require equipment washing before entry into sensitive areas. Spill response and fire prevention materials should be located with crews during construction. Finally, erosion and sediment control devices should be installed and maintained during construction, and then removed when no longer necessary.	The EIS includes a number of best management practices (BMPs), Design Features (DFs), and proposed mitigation to address the commenter concerns. Additionally, per DF TWE-2, a Construction, Operation, and Maintenance (Com) plan will be developed that includes many of the plans identified by the commenter. WVEC BMP ECO-1 (see Table C.1-1) stipulates the need to identify important, sensitive, or unique habitats and BLM sensitive, FS sensitive, and state-listed species in the vicinity and, to the extent feasible, design the project to avoid, minimize, or mitigate impacts to these habitats and species. DF TWE-29 indicates that the Biological Protection Plan will be developed as part of the COM plan. Additionally the proposed mitigation in Table C.5-1 includes a number of proposed measures to reduce impacts to specific plant and wildlife species. Several BLM FO RMPs include speed restriction in various wildlife habitats (see Section C.3, Richfield and St. George FOs). Additional mitigation measures SSWS-5SS-7 and RANGE-7 have been proposed to reduce speed limits in certain habitats within the project area (see Table C.5-1). WVEC BMP VEG -2 (see Table C.1-1) stipulates the need for an integrated vegetation plan that addresses invasive weeds. DF TWE-26 (see Table C.2-1) indicates that the Noxious Weed Managements Plan will be developed as part of the COM plan. Proposed mitigation measure NX-1 (see Table C.5-1) restates that a noxious weed management plan will be included in the COM plan and further stipulates the plan would include washing vehicles. DF TWE-64 (see Table C.2-1) incorporates the commenter's suggestion regarding about fire protection materials and further stipulates that a Fire Protection Plan will be included in the COM plan. DFs TWE-19 through TWE-25 (see Table C.5-1) outline erosion control and spill prevention practices to protect groundwater and surface water. Per TWE-57 a spill prevention notification and cleanup plan will be prepared as part of the COM plan. Additionally proposed mitigation measures S-6 and S-11 further identify additional stipulations related to erosion control structures.
The Wilderness Society	164-1480	Requiring a tower design that minimizes and discourages perching and nesting by raptors and ravens;	Comment noted. Tower design is determined on a site specific basis and includes multiple resource considerations alongside engineering/safety/reliability criteria. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. No change to text.
The Wilderness Society	164-1481	Patrol and monitoring to detect raven nests and steps to remove them;	Development of a raven management plan, which would include adaptive management strategies for controlling raven predation and nesting within the Project ROW, has been included in the Final EIS as additional mitigation for desert tortoise (SSWS-4.14) and greater sage-grouse (SSWS-5.4). Moreover, TransWest's APP is expected to outline a nest management process and process for obtaining permits to move nests, if and where needed.
The Wilderness Society	164-1482	The project site will be clearly marked or flagged at the outer boundaries prior to initiation of ground disturbance. Project activities shall be limited to the marked or flagged areas and whenever possible, activities shall occur within previously disturbed areas;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures as discussed in Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Furthermore, TWE-10 and TWE-13 outline TransWest's commitment to develop a Construction, Operations, and Maintenance Plan that outlines flagging of construction areas and measures to minimize new ground disturbance.
The Wilderness Society	164-1483	The proponent shall remove only the minimum amount of vegetation necessary for the construction of structures and facilities. Where possible and if needed, topsoil shall be conserved during excavation and reused as cover on disturbed areas to facilitate re-growth of vegetation;	Applicant committed design measures, agency BMPs, and the proposed soil and vegetation mitigation measures will be implemented to minimize vegetation disturbance and conserve topsoil.
The Wilderness Society	164-1484	Noxious weeds will be controlled on disturbed areas within the limits of the right-of-way;	NOX-1 to NOX-3, as well as the applicant committed measures will minimize the spread and establishment of noxious weeds. This includes the control of noxious weeds through the use of herbicides, and mechanical treatments within the Project ROW.
The Wilderness Society	164-1485	Minimizing the construction of new access roads; Taking appropriate steps to prohibit and discourage recreational use of them, including official BLM closures, signing and patrols.	Where appropriate, mitigation measure REC-2 is proposed to limit access to existing roads and/or require reclamation of any new roads. Where appropriate, REC-3 is proposed to limit new roads to designated utility corridors. As stated in Section 3.13.6.8 on DEIS page 3.13-34, project access roads would be evaluated on a case-by-case basis by the appropriate federal or state land manager to determine whether to close roads to the public, close and reclaim roads, or leave roads open as part of the transportation network. The text acknowledges that closed roads may be an attractive nuisance and lead to unauthorized OHV use and associated resource damage, noise, etc. Other deterrents such as barriers, contouring, and revegetation may be used to indicate closed roads as determined on a site-specific basis depending on site-specific needs, management requirements, and reasonable application of the treatment.
The Wilderness Society	164-1486	Requiring a desert tortoise awareness program be provided to all project workers onsite, which must be in the form of a presentation by an authorized tortoise biologist. The program will include, but not be limited to: discussion of the Endangered Species Act and the consequences of noncompliance with it; hazardous substance spill prevention and containment measures; and whom to contact if a desert tortoise is observed. Additionally, it will include information on the life history of the desert tortoise, legal protection for desert tortoises, penalties for violations of Federal and State laws, general tortoise activity patterns, reporting requirements, measures to protect tortoises, and Terms and Conditions of the biological opinion.	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Furthermore, TWE-33 outlines TransWest's commitment to provide environmental awareness training to all construction staff. Requirements for desert tortoise education programs for construction staff are commonly outlined in the terms and conditions of the USFWS Biological Opinion issued as part of the Project's section 7 consultation under the ESA.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1487	All vehicles, equipment, and crews would be escorted by a biologist driving a utility terrain vehicle at all times when in desert tortoise habitat;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Requirements for desert tortoise monitoring of construction staff are commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of formal section 7 consultation under the ESA.
The Wilderness Society	164-1488	All Project sites would be searched for desert tortoises prior to implementation of work activities;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Requirements for desert tortoise monitoring by construction staff are commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of formal section 7 consultation under the ESA.
The Wilderness Society	164-1489	The ground under and around all parked vehicles would be checked before the vehicles are moved;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Requirements for desert tortoise monitoring by construction staff are commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of formal section 7 consultation under the ESA.
The Wilderness Society	164-1490	A 15 mph speed limit shall be required for all project vehicles on the project site and unposted access roads;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Restrictions on construction equipment speeds are commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of the ESA section 7 consultation process.
The Wilderness Society	164-1491	If a desert tortoise or a desert tortoise nest is discovered, construction activities in the immediate area should cease. The tortoise shall be moved 150 to 1,000 feet from the point of capture authorized desert tortoise biologist in accordance with Service-approved guidelines;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Desert tortoise-specific conservation measures have been added to proposed mitigation measure SSWS-4 in the FEIS. Requirements for desert tortoise conservation are also covered in the terms and conditions of the USFWS Biological Opinion issued at the culmination of formal section 7 consultation under the ESA.
The Wilderness Society	164-1492	All potential desert tortoise burrows shall be flagged and avoided by all project vehicles, equipment, and activities. At the conclusion of project activities, flagging shall be removed;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Flagging and avoidance of identified burrows within active construction areas is commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of the ESA section 7 consultation process.
The Wilderness Society	164-1493	Burrows containing tortoises or nests will be excavated by hand, with hand tools, to allow removal of the tortoise or eggs. Ground disturbance in the area should not resume until approval is received from the tortoise biologist;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization or mitigation measures as discussed in Applicant Committed Measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Requirements regarding the manual handling and translocation of desert tortoise individuals and nests/eggs are commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of the ESA section 7 consultation process. Refer also to proposed mitigation measure SSWS-4 in Section 3.8.6 and Appendix C, Table C.5-1, which has been augmented for the Final EIS.
The Wilderness Society	164-1494	All excavations shall be checked for tortoises periodically throughout the day and immediately before backfilling. If excavations are not backfilled at the end of the day, they shall be covered and/or fenced to ensure that tortoises cannot enter them;	Comment noted. TransWest has committed to ensuring that construction and operation of the project remain compliant with all applicable federal and state-required avoidance and minimization or mitigation measures per Applicant-committed measures TWE-29 and TWE-31 (DEIS Appendix C Page C-17). Management of desert tortoise access to active construction areas is commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of the ESA section 7 consultation process. Refer also to proposed mitigation measure SSWS-4, which has been augmented for the Final EIS.
The Wilderness Society	164-1495	No cross-county travel or travel outside the ROW would be permitted.	Any necessary off-road travel restrictions are identified in Appendix C, which will be outlined in the Record of Decision and associated ROW grant resulting from the EIS process.
The Wilderness Society	164-1496	All project-related trash and food items shall be disposed properly in predator-proof containers with resealing lids. Trash, stakes, flagging materials, temporary facilities, litter, and all other project-related materials shall be removed from site upon completion of project activities.	This mitigation is already proposed under Applicant Committed Measure TWE-61 in Appendix C Table C.2-1 (DEIS page C-19).
The Wilderness Society	164-1497	All power lines shall be designed, installed, and constructed to be avian-safe in accordance with the standards outlined in "Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006" (APLIC 2006);	Comment noted. Per Applicant-committed measure TWE-30, Transwest has committed to raptor-safe design standards outlined in APLIC 2006. This information is provided in Section 3.7.4.3 Nongame Species; Section 3.7.6 Impacts to Wildlife Species; and Appendix C, Table C.2-1.

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The Wilderness Society	164-1498	<p>All ground-disturbing activities will be conducted outside the migratory bird nesting season (March 15 August 31). If ground-disturbing activities cannot be avoided during this time— period, pre-construction nest surveys shall be conducted by a BLM-approved biological monitor with the following guidelines:</p> <ul style="list-style-type: none"> - For all non-raptor bird species, surveys shall cover all potential nesting habitat in and within 100 feet of the area to be disturbed; - Surveys must be conducted between sunrise and 3 hours post-sunrise when birds are most active; - Active bird nests will not be moved during the breeding season unless the holder is expressly permitted to do so by the USFWS, BLM, and NDOW; - All active nests and disturbance or harm to active nests will be reported within 24 hours to the USFWS, the BLM, and NDOW upon detection. The biological monitor will halt work if it is determined that active nests are being disturbed by construction activities, until further direction or approval to work is obtained from the appropriate agencies. 	Comment noted. Proposed mitigation measures WLF-1 and WLF-2 address potential impacts to migratory songbirds and raptors, respectively, during the avian breeding season. Additional details on avian conservation measures would be provided in the Avian Protection Plan to be prepared by TransWest as part of the TWE Biological Protection Plan and COM Plan.
The Wilderness Society	164-1499	Bird diverters will be placed on guy wires in important bird habitat.	Comment noted. TransWest has committed to project conformance with avian protection design standards outlined in APLIC 2006. Additional proposed mitigation measures requiring TransWest to conform to design standards for minimizing avian collisions with transmission lines per APLIC 2012 and using bird diverters on guy wires in IBAs have been added to Section 3.8.6 of the Final EIS. A comprehensive list of avian conservation measures will be outlined in the TWE Avian Protection Plan.
The Wilderness Society	164-1500	Transmission technology continues to improve, as do examples of successful implementation of new techniques to minimize impacts. These include but are not limited to: upgrading the voltage rating of existing lines within an already established corridor, reconstructing lines in already established corridors, locating new transmission in already established corridor and where necessary undergrounding lines. Advanced tower designs, using double circuits on compact monopoles and performing tower installation and maintenance with helicopters are commonly utilized practices that reduce surface soil impacts in sensitive habitats. Though these advanced approaches may increase technical and economic challenges for projects, they will only become more important to consider as transmission is called on to “thread the needle” between protected and sensitive landscapes and urban communities. We recommend that the Agencies fully analyze opportunities to employ these technologies in the FEIS.	Consideration of burying portions of the Project and double-hanging with existing transmission lines are discussed in Section 2.7, "Alternatives Considered but Eliminated from Detailed Analysis." Tower designs and helicopter construction are considered throughout the document where applicable to minimize resource impacts (e.g., Section 3.8, Wildlife and Section 3.15, Special Designations).
The Wilderness Society	164-1501	Existing special designations described in federal land management land use plans to protect biological, scenic, visual, cultural, and historic resources must be maintained and honored. For example, for any sections of the proposed line crossing particularly sensitive areas, the Agencies should analyze both re-routing to avoid those areas and burying the lines in or near existing ROWs to lessen the impacts. We appreciate that line burial is an expensive option, but increasing use of this technique in Europe and Australia, both terrestrial and subsea, suggests that it could be an option to mitigate impacts to sensitive resources when rerouting may not be feasible. Although there are a number of high voltage, long distance HVDC lines in service around the world of a scale and rating that could serve projects of the TWE scale, they are not underground lines. These lines appear to be technically possible, but may not be commercially feasible at this time (although given the time it may take the develop TWE, we encourage BLM, Western and the TransWest to continue to study undergrounding portions of the lines where necessary).	Consideration of burying portions of the Project is discussed in Section 2.7, "Alternatives Considered but Eliminated from Detailed Analysis".
The Wilderness Society	164-1502	Following BLM's Special Status Species Policy and its ESA Section 7(a)(1) affirmative obligations to conserve and recover listed species, as well as the BLM's requirements to manage for the full range of resources and values on public lands, the FEIS should detail how specific impacts from TWE will be mitigated through required, specific off-site mitigation actions. It is unacceptable to defer identification of and commitment to specific off-site mitigation measures until after the FEIS is published. Without this information, the public cannot fully and fairly analyze the impacts of the proposed TWE project.	The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the TWE ROD.
The Wilderness Society	164-1504	The Agencies should implement a “no net loss” or a “net gain” requirement for resources and values, with the goal of achieving a “net conservation benefit” for special status resources and species, including BLM Special Status Species. The Agencies should ensure that any loss of resources or values associated with the TWE project is compensated with the addition and protection of equivalent or better resources and values offsite. The Agencies should ensure a net benefit of in-kind habitat value.	The BLM is not statutorily required to ensure a no net loss of habitat resulting from its authorized actions. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM lead agencies will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the Final EIS.

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The Wilderness Society	164-1505	If Lands with Wilderness Characteristics are damaged by TWE, amendments should be made to the Resource Management Plan for the region to protect other, equally valuable Lands with Wilderness Characteristics near the area of impact. Additions of lands and resources should equal or exceed the value of any resources or values which are lost.	As stated in Section 3.20.1 of the Draft EIS, Section 201 of FLPMA requires the BLM to maintain, on a continuing basis, an inventory of all public lands and their resources and other values, which includes wilderness characteristics. Section 201 also provides that the preparation and maintenance of the inventory shall not, by itself, change or prevent change of the management or use of public lands. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Therefore, there is no RMP decision related to these units that requires an amendment nor is there an impact to these units that rise to the need of mitigation based on the significance criteria. Mitigations proposed for other resources can be found in those sections. However, these concerns have been shared with decision-makers for their consideration.
The Wilderness Society	164-1506	The Agencies should also make a determination about the value of the habitat to be impacted and establish mitigation requirements for the specific habitat types impacted.	The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the TWE ROD.
The Wilderness Society	164-1507	The BLM must designate and manage public lands to ensure that any mitigation on those lands is protected to provide enduring conservation benefits. To help achieve more enduring protections, the BLM must layer existing authorities available to the agency including designation of lands as Areas of Critical Environmental Concern or protective management of Lands with Wilderness Characteristics, and withdraw from those lands all uses which are incompatible with the conservation objectives. The management plans for these areas must include comprehensive protections for the resources in question, including ROW exclusion, no surface minerals leasing, no off-road vehicle use, etc.	Impacts to special designation areas such as Areas with of Critical Environmental Concern are disclosed in Section 3.15 of the Draft EIS, including an analysis of the compatibility of the project with designated management stipulations or plans. As appropriate, mitigation has been included to protect the values for which the ACEC or other special designation areas are being managed. No additional special management areas are proposed as part of this project, and as such, development of management plans for special designation areas is beyond the scope of this project. Impacts to Lands with Wilderness Characteristics (LWCs) are disclosed in Section 3.20 of the Draft EIS. Development of management plans for LWC is beyond the scope of this project.
The Wilderness Society	164-1508	To the degree that it is consistent with conservation needs for specific species and resources, acquisition, restoration, and long-term management of private lands to mitigate unavoidable impacts is another tool which should be used. If newly acquired or protected lands are to be held in non-federal ownership, conservation values must be given similar permanent protection through deed restrictions and easements, and funding must be secured for long-term management of these lands consistent with the mitigation strategy employed.	The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS.
The Wilderness Society	164-1509	If consistent with conservation needs for specific species and resources, acquisition of private land to be placed within the federal estate and managed with comprehensive protections for the resources in question, and withdrawal from those lands all uses incompatible with the conservation objectives.	The lead agencies will make a determination if compensatory mitigation in the form of conservation easements is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the ROD.
The Wilderness Society	164-1511	While mitigation for impacts to biological resources is critical, it should not be limited to just those resources. The Agencies should address mitigation for impacts across the range of values and resources found on public lands, including but not limited to Lands with Wilderness Characteristics and Roadless Areas, visual resources, and opportunities for non-motorized recreation.	The proposed mitigation measures described in the Draft EIS are not limited to biological resources. The Draft EIS contains includes mitigation measures to address impacts to a variety of physical and human resources.
The Wilderness Society	164-1512	Off-site mitigation should be required to take place in the same ecoregion as the project site, and as locally as possible wherever feasible. 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 and "net conservation" benefit for USFWS Threatened and Endangered species and BLM Special Status Species. The Agencies 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 and other mitigation measures, will be necessary.	Your preference for local offsite mitigation is noted. The Draft EIS includes mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS.
The Wilderness Society	164-1513	As impacts from TWE will vary significantly across the 725-plus mile project distance, wherever possible the Agencies should require that off-site mitigation be implemented on a far more local scale than simply in the same ecoregion as the impact.	Your preference for local offsite mitigation is noted. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS.
The Wilderness Society	164-1514	To mitigate for the significant impacts to the habitats of the threatened Mojave population of desert tortoises, a species already under significant threat from infrastructure development throughout its range, the proponent should be required to provide mitigation funds above those required by Section 7. Recommended mitigation actions could include ground conservation actions such as land acquisitions, installing protective fencing, retiring grazing allotments, withdrawals of locatable mineral entry, limiting off-highway vehicle access, implementing restoration projects, and continued funding of the Desert Tortoise Conservation Center.	Comment noted. Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state-required avoidance and minimization or mitigation measures relevant to the desert tortoise. Construction practices and required mitigation within the project area is commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of the formal ESA section 7 consultation process. Refer also to proposed mitigation measure SSWS-4 in Section 3.8.6 and Appendix C, Table C.5-1, which has been augmented for the Final EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1515	We support Habitat Equivalency Analysis (HEA) methods that precisely define mitigation needed to offset both short and long-term project impacts and benefit affected populations while still maximizing landscape-scale conservation. As presented in our comments on the Gateway West DEIS, Sage-grouse Supplement, and FEIS (Attachment 1), actual species habitat use data is the appropriate basis for estimating Habitat Services, the currency of an HEA. Our previous recommendation for the Gateway West Habitat Services Metric (HSM) model was that the predictions of this heuristic, expert opinion-based model be checked against the scientifically rigorous USGS Wyoming Basin Ecoregional Assessment (WBEA) sage-grouse models (Hanser et al. 2011). These models, based on sage-grouse pellet counts taken from surveys across the ecoregion, tested a far more comprehensive set of predictors, including disturbance from transmission lines, and incorporated the spatial scale at which predictors were influential.	Thank you for your comment, it has been forwarded to the Applicant for their consideration in preparing the Greater Sage-Grouse HEA for this project. The TWE HEA process is based upon current resource knowledge and the best available information provided through consultation with applicable wildlife management agencies. Completion of the HEA process is anticipated to be concurrent with the release of the FEIS.
The Wilderness Society	164-1516	The approach we recommend for Transwest Express is based on project-specific modeling efforts, similar to the WBEA. We suggest that the TWE HEA focus on (1) defining the best model for the purposes of valuing habitat proposed for development (vs. habitat proposed for preservation or mitigation) and on (2) the effects of transmission lines and structures themselves. Restoration methods might also be included in the HEA on an experimental, adaptive management basis, but at this time there is insufficient understanding of their equivalency to habitat loss and degradation to allow full use in HEAs. We oppose the use of an opinion-based approach like that used for Gateway West to assess the impacts of development on sage-grouse, habitat services lost, and resulting mitigation needed for the species. We continue to believe this approach could lead to significant negative impacts on this already compromised species. Recommendation: The Agencies must adopt a HEA process that models actual sage grouse habitat use to identify the strongest habitat predictors. The attempt to define them a priori through an expert opinion process lacks sufficient biological realism and is inherently inaccurate. The HEA and all associated data should be available for public review prior to the release of the FEIS.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. The TWE HEA process is based upon current resource knowledge and the best available information provided through consultation with applicable wildlife management agencies. Completion of the HEA process is anticipated to be concurrent with the release of the TWE FEIS.
The Wilderness Society	164-1517	We recognize that the proponent has committed to developing an operational policy and a comprehensive strategy for collecting data, minimizing impacts, and mitigating loss of migratory birds and essential habitats prior to the initiation of construction. This policy and strategy will be incorporated into a single, over-arching, living document (Avian Protection Plan or Bird Conservation Strategy) that will include a full listing of all minimization measures included in this analysis, as well as recommendations from the USFWS and additional information included within the Avian Protection Plan Guidelines, developed by the USFWS and APLIC in 2005 (APLIC 2012). The APP should describe how the transmission tower design will reduce electrocution risks, prevent nesting, and prevent collisions with electrical wires and tower support wires. The TWE APP should be continually evaluated and refined as monitoring data and new innovations, as well as ongoing information on avian impacts, become available.	The TWE APP will include discussion of the recommended topics. Although the project specific TWE APP may not be continually updated to reflect refined monitoring data and new avian protection measures, Western Power Administration consistently updates internal policy regarding transmission line operations to reflect the current industry standards in avian conservation.
The Wilderness Society	164-1519	Ensuring reclamation of disturbed habitat with native species will require a plan informed by the best available science as well as a rigorous inspection program to achieve goals and objectives in the short-, medium- and long-term.	The Final Plan of Development developed by the applicant prior to construction will focus on site-specific reclamation plans that will meet the land management agencies land use plan requirements, and will be based on the best available data on achieving reclamation success.
The Wilderness Society	164-1521	BLM should also protect lands with wilderness characteristics, including Citizens' Proposed Wilderness (CPW) areas, from development because of the important resources and values found there. CPW lands have been inventoried by various citizens groups, conservationists, and agencies and have been found to have "wilderness characteristics," including naturalness, solitude, and the opportunity for primitive recreation. Beyond these core values, these lands also provide important wildlife habitat, cultural and scientific resources, invaluable ecosystem services including clean air and water, important economic benefits, and many other resources and values. The sensitive nature of these lands and their resources and values makes transmission development inappropriate there. Potential impacts to specific LWC and CPW areas from TransWest routes are addressed in Appendices A-D on the routes.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM. The BLM inventory for each field office was used as the baseline information in the lands with wilderness characteristics analysis. Citizen Proposed Wilderness (CPW) areas are conducted by independent groups without oversight from the agencies that manage those lands. While the BLM does consider CPW areas in their wilderness character inventories and land use planning processes, only official designations of these areas by the land management agencies have been used in the analysis.
The Wilderness Society	164-1522	We appreciate that some field offices updated their LWC inventories in response to the proposed TWE project. However, in the Little Snake Field Office, the BLM is still in the process of conducting full field inventories of all the draft units—units adjacent to WSAs have not been inventoried in the field. In addition, because the Little Snake field office's draft inventory was not made public until September 10, 2013—less than three weeks before the comment period deadline for this DEIS—conservation groups, the public, and other interested parties have not had sufficient time to analyze the BLM's inventory or go into the field to confirm the boundaries and wilderness characteristic determinations that were made. Because of this fact, it is likely that scope and size of the units analyzed in this draft EIS is inaccurate.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS, which has since been made available for public review and that information has been incorporated into the Final EIS.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1523	Pursuant to FLPMA and IM 2011-154 and Manuals 6310 and 6320, BLM must update its inventory of lands with wilderness characteristics in areas potentially affected by the proposed TWE corridor. The Agencies should also protect lands with wilderness characteristics, including CPW areas, from development. If impacts cannot be avoided, then on and off-site mitigation should be required. The Agencies should address the inaccuracies in the Little Snake Field Office LWC inventory.	Outstanding inventories have been updated for the Little Snake and White River Field Offices in the fall of 2012 and are scheduled for the Fillmore Field Office in the winter of 2014. Policy guidance, as established in BLM Manual 6320 section .06, states that "The BLM will evaluate lands with wilderness characteristics through the land use planning process. When such lands are present, the BLM will examine options for managing these lands and determine the most appropriate land use allocations for them. Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) emphasizing other multiple uses as a priority over protecting wilderness characteristics; (2) emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics; (3) the protection of wilderness characteristics as a priority over other multiple uses." Development potential is stated as one of the resource values that should be considered when evaluating wilderness character and potential designation through a land use planning process. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas. Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM. The BLM inventory for each field office was used as the baseline information in the lands with wilderness characteristics analysis. Citizen Proposed Wilderness (CPW) areas are conducted by independent groups without oversight from the agencies that manage those lands. While the BLM does consider CPW areas in their wilderness character inventories and land use planning processes, only official designations of these areas by the land management agencies have been used in the analysis. However, these concerns have been shared with decision-makers for their consideration.
The Wilderness Society	164-1524	where TWE routes overlap with COCs, the Agencies and the Proponent must take special care to set out the issues identified for the COCs in Exhibit A to the settlement agreement (Attachment 3). In some cases, alternative routes in COCs could be the lowest-impact routes analyzed in the DEIS in the region. For this reason, the fact that a route is in a COC should not eliminate an alternative route from consideration altogether, but it does require additional actions as defined in the settlement agreement, including consideration of how the values at risk will be affected and/or can be protected. Specific issues relating to COCs and recommended mitigation measures to address those issues are included in Appendices A-D on the routes. We also recommend that the Agencies evaluate whether to delete or modify the corridor designations that are within COCs and consider possible new corridor designations to help access renewable energy as part of these RMP amendments.	The Draft EIS acknowledges the concerns you express regarding Corridors of Concern. Additionally, the Draft EIS did not eliminate alternatives from detailed analysis for the sole reason that they were in a Corridor of Concern. Additionally, and changes or additions to corridor designations in the Draft and Final EISs were made to ensure compliance with agency land use plans and relevant regulations, including judicial requirements related to the Corridors of Concern.
The Wilderness Society	164-1525	The DEIS presents wildlife impacts, including to special status wildlife, by alternative route (see Table 2-23) rather than segments. In some instances within the DEIS, impacts by alternative route are broken down not only by region but also by BLM Field Office. Unfortunately, even this level of information aggregates impacts at too coarse of a spatial scale to allow reviewers to understand and evaluate the level of impact across the individual segments. It is unrealistic to expect that one of the alternatives, as a whole, presented in the DEIS will ultimately be selected for the transmission route. Given this, the manner in which wildlife impacts are presented in the DEIS limits the ability of reviewers to provide feedback or guidance on unique routing combinations, severely limiting the ability of the public to understand the impacts and engage in the NEPA process. This information was presented for selected segments, specifically the alternative connectors, and should be provided for all the segments. This can be accomplished through GIS analyses of data already compiled for the DEIS and would allow for much better analysis of route alternatives. In addition, this lack of information limited our collective ability to identify site-specific opportunities for mitigation. Our organizations strongly encourage this information be made available in the FEIS, especially as current GIS technology makes this analyses possible.	Comment noted. The Draft EIS and Final EIS provide analyses by alternative and region to allow meaningful comparison of the alternatives. An analysis of project disturbance by segment has been included as an appendix to the Final EIS.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1526	<p>Too many uncertainties remain about segment specific impacts, including but not limited to:</p> <ul style="list-style-type: none"> - Waterfowl habitat (acres) construction/operation - Number of raptor nest within 1 mile of the reference line - Impacted potential black-footed ferret habitat (acres) construction/operation - Impacted greater sage-grouse habitat (acres) construction/operation - Number of occupied leks within 4 and 11 miles of reference line - Number of special status raptor nests within 1 mile of reference line - Big game crucial winter ranges and habitat types - Acreage of Bird Habitat Conservation Areas crossed by the Alternatives <p>Recommendation: Wildlife impacts should be broken down by segments to enable reviewers to understand and evaluate the level of impact across individual segments.</p>	<p>Comment noted. The Draft EIS and Final EIS provide analyses by alternative and region to allow meaningful comparison of the alternatives. An analysis of project disturbance by segment has been included as an appendix to the Final EIS.</p>
The Wilderness Society	164-1527	<p>Conservation easements were inadequately addressed within the DEIS. The lack of consideration of these legal agreements and their location in relation to the proposed alternatives limits the ability of reviewers to evaluate the impacts associated with developing particular segments. The challenges presented by the Tuttle Ranch Conservation Easement in Colorado are illustrative of the issue. Even though micro-siting options are outlined in the DEIS (2-40), the document fails to fully represent the challenges on the landscape – including the nearby substantial easement being pursued by NRCS and the Colorado Cattlemen’s Association. Independent review by one of our organizations, using the National Conservation Easement Database, identified unreported conservation easements which overlap proposed routes. This information, in addition to outreach to major entities involved in conservation easements, should be included in the FEIS analyses for impacts by individual segments. From the public’s perspective, this failure reduces the ability to minimize impacts and the upfront opportunity to identify site-specific mitigation locations. Failure to identify conservation easements raises concerns about not only conservation impacts, but also delays, increased costs and complications for this transmission route, as unknown conservation easements are identified later in permitting process.</p> <p>Recommendation: The Agencies should make every effort to identify existing and proposed conservation easements which might fall within the transmission corridor, including outreach to major entities involved in recruitment and management of conservation easements. This information, summarized by segment number, should be included in the FEIS.</p>	<p>The conservation easements identified in Section 3.14 were reviewed against the National Conservation Easement Database to confirm that all existing conservation easements overlapping proposed routes were included in the analysis. However, it is important to note that conservation easements that are still in progress, including the easement currently being pursued by NRCS and the Colorado Cattlemen’s Association, may not be included in the National Conservation Easement Database. The EIS team consulted with NRCS to identify existing and proposed conservation easements. Conservation easements that are proposed but not yet finalized were identified and analyzed in Section 3.14.</p>
The Wilderness Society	164-1528	<p>our organizations ask for clarity from the Agencies how these two federal priority projects (the BLM’s National Sage-Grouse Conservation Strategy and the Rapid Response Team for Transmission selection of TWE as one of seven priority transmission projects) will move forward effectively, not just in regards to TWE but also for other priority transmission projects – including Gateway South. Given the importance of sage-grouse conservation, BLM should heavily weigh sage grouse conservation in determining the preferred route. While we understand the BLM’s goals are to be consistent with or complementary to other management actions whenever possible, our organizations want thoughtful planning that will ensure that impacts to grouse are avoided to the greatest extent possible and where this cannot be done, minimized through inclusion of scientifically sound decision-making and meaningful public input.</p>	<p>Comment noted. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate. One of the criteria used in evaluating the Project alternatives is potential impacts to sensitive species, including sage grouse.</p>
The Wilderness Society	164-1529	<p>Alternative D is also the only alternative that specifically addresses large transmission lines (greater than 230 kilovolts), which brings into question whether the BLM has presented a reasonable range of alternatives and the appearance of pre-decisional information in habitat that is of critical importance to the long-term management of GRSG. For large transmission lines, such as TWE, Alternative D (see figure 2-8, page B-14 in NW CO GRSG Draft RMP) has PPH as exclusion areas except for the 68,000 acres managed as an avoidance area. This avoidance area follows the same approximate route identified as the BLM-preferred alternative (D) for TWE.</p>	<p>Comment noted. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate.</p>
The Wilderness Society	164-1530	<p>Although these federal processes are moving separately, they need to be aligned such that they are using current and accurate science, and incorporate a meaningful range of alternatives that can be consistently applied across the two processes. We would also note that, as with the Colorado example provided above, other affected states have state-specific approaches to managing sage-grouse, which will also address the lands addressed by the TWE EIS, so similar analyses will be required for other route segments. Further, the public should have an opportunity to review and comment on those elements before final decisions are made.</p>	<p>Comment noted. Transwest has committed to the construction and operation of TWE remaining compliant with all applicable federal and state-required avoidance and minimization measures relevant to the greater sage-grouse. The NW Colorado and Utah greater sage-grouse LUP amendment EISs are currently under review. Depending upon the timing of the completion of the applicable NEPA processes, TWE intends to comply with all current land use stipulations resulting from these EISs and associated LUP amendments.</p>

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1531	Earlier this year, the U.S. Geological Survey in cooperation with the BLM, released “Summary of Science, Activities, Programs, and Policies the Influence the Rangeland Conservation of Greater Sage-Grouse (<i>Centrocercus urophasianus</i>): Open-File Report 2013-1098” 14. This report notes that transmission lines and local distribution lines are widespread throughout the range of sage-grouse and are especially prevalent in MZ II and in priority habitats in portions of MZs III and IV. This proposed high voltage transmission line will be an additional disturbance on the landscape, with its placement determining level of impacts to this imperiled species.	Comment noted. Thank you for providing this potential source of information. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1532	Recent range-wide breeding density analysis performed for the BLM stresses the importance of specific areas to sage-grouse, and thus conservation prioritization. Specific portions of TWE routes fall within areas that contain the top 25 percent of the breeding population within Management Zones II (WY, CO, UT) and III (UT, NV).	Comment noted. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate.
The Wilderness Society	164-1533	The USFWS 2010 Findings state, “Southwestern and central Wyoming and northwestern Colorado in MZ II has been considered a stronghold for sage-grouse with some of the highest estimated densities of males anywhere in the remaining range of the species (Connelly et al. 2004, pp. 6-62, A5-23). Wisdom et al. (in press, p. 23) identified this high-density sagebrush area as one of the highest priorities for conservation consideration as it comprises one of two remaining areas of contiguous range essential for the long-term persistence of the species” (page 35). Therefore, we remain concerned that the TWE transmission line will cause significant adverse impacts to Greater Sage-Grouse (GRSG) if improperly sited. Priority habitats should be identified and protected with adequate stipulations. Leks, nearby nesting and brood-rearing habitats, and winter habitat should be avoided. Locations for appropriate mitigation should be identified using the latest in spatial tools, and monitoring enforced to determine effectiveness. Our organizations recognize that careful planning and siting for TWE will not only benefit directly impacted populations of grouse but also be helpful in minimizing impacts from other proposed high voltage transmission lines.	Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state-required avoidance and minimization or mitigation measures relevant to the greater sage-grouse, including sage-grouse-related land use plan amendments in place at the time of the TWE ROD. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and Applicant objectives while balancing federal land managers’ multiple use mandate.
The Wilderness Society	164-1534	The DEIS has little or no discussion of actual habitat and population conditions and trends in the Core/Priority/PPH Habitats identified as being overlapped by the Project Area. BLM needs to incorporate and analyze additional site-specific information for each individual core area, based on a search of existing state data and scientific research. The discussion should include (1) a quantitative discussion of the most recent survey data regarding leks and bird numbers, (2) a qualitative discussion of the resource values and current condition of these priority habitats - including trends, threats, and direct, indirect and cumulative impacts and (3) other issues and special resource values in the priority habitats relevant to the impacts anticipated with construction and operation of this high voltage transmission line - including migration corridors, connectivity, breeding density, special habitat types such as brood-rearing or winter habitat, and existing disturbance levels and percentage. These analyses will reflect the best current scientific information, and the fact that all core areas may not be “created equal” with regard to habitat quality and importance to conservation and recovery efforts.	Comment noted. The information regarding quantitative lek survey data is provided in Tables 3.8-20, 3.8-21, 3.8-22, 3.8-23, 3.8-32, 3.8-33, 3.8-34, 3.8-44, and 3.8-45. Discussion regarding trends and threats is provided in Section 3.8.4.1 (DEIS pages 3.8-12 to 3.8-14) and Section 3.8.6. Published information regarding habitat status and quality of individual core areas is currently not available and is therefore not included in the DEIS.
The Wilderness Society	164-1535	In addition, as noted in a previous section, the DEIS presents GRSG impacts by alternative route (see Table 2-23) rather than segments. In some instances within the DEIS, impacts by alternative route are broken down not only by region but also by BLM Field Office. Unfortunately, even this level of information aggregates impacts at too coarse of a spatial scale to allow reviewers to understand and evaluate the level of impact across the individual segments. It is unrealistic to expect that one of the alternatives, as a whole, presented in the DEIS will ultimately be selected for the transmission route. Given this, the manner in which wildlife impacts are presented in the DEIS minimizes the ability of reviewers to provide feedback or guidance on unique routing combinations, reducing the value of public engagement. This information was presented in a limited fashion for selected segments, specifically the alternative connectors, but should be provided for all the segments. This can be accomplished through GIS analyses of data already compiled for the DEIS and would provide more defensible justification for selected route segments.	Comment noted. The TWE DEIS provides analysis at the alternative level in accordance with lead agency direction. Analysis at the segment level would not provide for proper public disclosure in that it would be very cumbersome for the reader to determine overall project impacts for practicable alternatives. Site-specific impacts will be determined at the Plan of Development stage of the project, following the Record of Decision.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1537	Surface disturbance is anticipated to have adverse impacts to sagebrush habitats including temporary and permanent loss of habitats across all alternatives. Fragmentation and degradation of habitat for GRSG also is anticipated from surface-disturbing activities and associated development. Therefore, protective stipulations within the project area deserve careful attention. The DEIS relies heavily on BLM field office stipulations. The DEIS identifies 18 RMPs that are relevant to this Project, the oldest of which was approved in 1983 (Table 1-3). While the DEIS specifies that “actions that result in a change in the scope of resource uses, terms, conditions, and decision of federal land use plans, including the approval of this proposal, may require amendment of one or more plans,” the emphasis of the document is on ROW delineations and authorizations not on the inconsistent and inadequate wildlife protections across the field office planning areas (DEIS at 1-11).	Comment noted. Although current BLM and USFS land use restrictions do vary across the project regions, most protections would apply throughout the life of the project and it is anticipated that BLM and USFS greater sage-grouse LUP amendments would be in place by the time of the ROD. Final species-specific measures would be outlined in the TWE Biological Protection Plan and appended to the project Notice to Proceed, should an action alternative be approved. Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state-required avoidance and protection measures relevant to the greater sage-grouse.
The Wilderness Society	164-1538	The protections afforded to GRSG are predominantly founded in inaccurate/inadequate protections. Collectively, our organizations continue to stress that that science strongly argues that the spatial restrictions (no surface use and controlled surface use restrictions) proposed in the DEIS are severely inadequate. The 0.25 mile and 0.60 restrictions around the perimeter of occupied leks have long been recognized as being without scientific merit and an inadequate protective measure to maintain lek activity (Holloran 2005, Walker et al. 2007). Instead, given the research from oil and gas development, the agency should avoid placing transmission lines within 5 miles of sage-grouse leks, which is also recommended by the USFW 18. The Lander RMP DEIS and FEIS both recognized this, as did the Miles City RMP. As noted in the latter, “BLM NSO stipulations for leasing and development within 0.25 miles of a lek would result in an estimated lek persistence (the ability of leks to remain on the landscape) of approximately 5 percent, while lek persistence in areas without oil and gas development would be expected to average approximately 85 percent. Impacts from energy development occur at distances between 3 and 4 miles.” ... “Impacts to leks caused by energy development would be most severe near the lek. Although most of the impacts from energy development are indirect, some direct effects, such as flying into overhead power lines would also result from energy development and ROWs. Miles City DEIS/RMP at 4-135.	Comment noted. Although BLM and other federal and state agency land use restrictions do vary across the project regions, most protections would apply throughout the life of the project. Applicant committed measure TWE-32 ensures that routine maintenance operations would be avoided in areas of existing sensitive resources during breeding and nesting periods. Applicable BLM RMPs and USFS LRMPs are currently being amended to include protections for greater sage-grouse. It is expected that these amendments will be in place by the time of the TWE ROD or, if not, that the decision makers will mandate that the Project adhere to consistent sage-grouse protections measures across the sage-grouse analysis area. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate.
The Wilderness Society	164-1539	Furthermore, the timing restrictions in the DEIS are also widely varying and could well pose a serious threat to nesting hens or those with foraging young. While there should be flexibility to incorporate local characteristics to fine-tune the window of protection (such as the addition of language “Where credible data support different timeframes for this seasonal restrictions, dates may be expanded by up to 14 days prior to or to the above dates” as was noted in the State of Wyoming Timing Restrictions, Table C.3-2), there should be a relatively consistent window of protections afforded to nesting and early brood rearing habitat. For example, in Wyoming, peak hatch generally occurs in early June and is followed by early brood rearing. Therefore, we strongly suggest that protections be extended until at least July 15 to be meaningful and maintain healthy future populations.	Comment noted. Applicant-committed measures are determined by the project proponent. Additional greater sage-grouse mitigation is outlined in measure SSWS-5 in Section 3.8.6 and Appendix C, Table C.5-1. It is expected that sage-grouse-specific amendments to applicable BLM and USFS land use plans will be complete by the time of the TWE ROD and that the Project would be required to adhere to these measures. Regardless, final sage-grouse avoidance, minimization, and mitigation measures will be outlined in the ROD and included in the TWE Biological Protection Plan appended to the Project’s Notice to Proceed.
The Wilderness Society	164-1540	Our review of the DEIS identified SSWS-5, which attempts to limit avian predation through anti-perching devices and reduce collisions with bird diverters, as the only mitigation measure for focused on reducing impacts to GRSG during the operation phase of the proposed Project. The remaining protective stipulations apply primarily to the development-specific time-frame. Instead, we urge that protections be extended into the operations and maintenance periods. Lander RMP FEIS notes that “wildlife seasonal protections from surface-disturbing and disruptive activities apply to maintenance and operations actions when the activity is determined to be detrimental to wildlife.” FEIS at 117. This is an important timing due to the longer period of time associated with maintenance and operations actions, beyond the usual development-specific stipulations. BLM supports this in the Lander RMP FEIS, “Beyond initial exploration (including geophysical activities), land clearing, and aboveground facility construction, continued human disturbance to special status wildlife could occur from activities such as equipment maintenance and site operations, which are especially disruptive during sensitive times (wintering, breeding, and nesting).” FEIS at 931. The Miles City Draft RMP noted that in areas where development occurred, “there would be no restrictions to operation and maintenance activities, which would potentially result in the reduction or extirpation of populations.” DEIS at 4-134 (emphasis added).	Comment noted. Although current BLM and USFS land use restrictions do vary across the project regions, most protections would apply throughout the life of the project. Applicant- committed measure TWE-32 ensures that routine maintenance operations would be avoided in special status species habitats during sensitive periods such breeding and nesting seasons. Note that SSWS-5 has been revised and augmented for the Final EIS and now includes measures applicable to operations and maintenance. Also note that the process to update BLM and USFS land use plans with greater sage-grouse protection measures is expected to be complete by the time of the TWE ROD and that these measures would therefore apply to the Project.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1542	The TWE DEIS fails to adequately address noise impacts. Facilities that produce continual noise can affect the breeding vocalizations of greater sage-grouse. Continuous noise from industrial facilities, such as high voltage transmission lines and substations, close to active greater sage-grouse leks would interfere with male greater sage-grouse strutting behavior which could reduce the reproductive success of greater sage-grouse using these leks. The BLM does note in the Gateway West FEIS, "construction-related noise and dust disturbance would occur during construction, which could potentially make habitat within the immediate vicinity of the activity temporally unsuitable for this species." FEIS at 3.11-65. We strongly recommend that BLM carefully review and incorporate new research which relates to noise impacts on grouse, as these are suggesting threats to sage-grouse population viability – through abundance, stress levels, and behavior 19. In the recently released Miles City Draft RMP, BLM recognizes the impacts of noise, "Movements associated with oil and gas wells, noise associated with disruptive activities and compressor stations, vehicle use, and human presence would impact numerous wildlife species indirectly, including sage grouse. Sage-grouse numbers on leks within approximately 1 mile of compressor stations would contain lower numbers than leks greater than 1 mile from compressors. Male attendance at leks would be expected to be reduced when subjected to the current standard noise limitation of 50 decibels at the lek site." Miles City DEIS/RMP at 4-135.	Comment noted. Discussion regarding impacts from noise is located in Section 3.7.6.2 (DEIS page 3.7-47). The reader is directed to this discussion via reference in Section 3.8.6.3 (DEIS page 3.8-48). Details regarding spatial and temporal protections of sage-grouse lek are specific to each BLM RMP and USFS LRMP and are listed in Table C.3-1 through C.4-6 (DEIS pages C-23 through C-120).
The Wilderness Society	164-1543	Because GRSG are designated as special status species, the species' distribution, key habitat areas, and special management needs should be identified in the FEIS. Winter habitat, including concentration areas, are referenced in the document (DEIS 3.8-14): "In years with severe winter conditions (i.e., deep snow), greater sage-grouse often gather in large flocks in areas with the highest quality winter habitat. It is suggested that high quality winter habitat is limited in portions of the greater sage-grouse's range (Connelly et al. 2000). Wintering habitat for greater sage-grouse has been defined for populations in Colorado and Utah, and is currently being defined for populations in Wyoming (WGFD 2012)" and (DEIS 3.8-60) "Marking would be prioritized in areas near leks, in winter concentration areas ..." As noted above, there is a wide range of timing protections across the field offices.	Comment noted. Greater sage-grouse winter and other seasonal habitat mapping is currently ongoing in Wyoming but has yet to become available for project use. The ultimate siting of Project facilities and seasonal timing restrictions on construction, operation, and maintenance activities will conform to applicable BLM and USFS land use plans and plan amendments in place at the time of the ROD.
The Wilderness Society	164-1544	In addition to developing some consistency through the RMP amendments, the DEIS itself needs to be improved. It fails to identify (through mapping) and assess the spatial distribution/acreage of current winter habitat for sage grouse and its current quality, especially as this latter will likely drive selection of appropriate protective measures and prioritize restoration activities. The Governor-appointed Wyoming Sage-grouse Implementation Team recently commissioned the Wyoming Chapter of the Wildlife Society, a non-profit organization of wildlife biologists, to review current protocol for identifying and mapping sage-grouse winter concentration areas. This report would be helpful for consideration in BLM's efforts going forward. The protocol proposed within this report may be helpful to the BLM when developing a defensible protocol for identifying and mapping sage-grouse winter concentration areas. Because of the importance of this habitat to grouse, we suggest protection for these areas based on what has been presented in the Lander FEIS/RMP (Record # 3006): "In identified greater sage-grouse winter range, vegetation treatments should emphasize strategically reducing wildfire risk around or in the winter range and maintaining winter range habitat quality."	Thank you for your comment. Mapping of greater sage-grouse winter and other seasonal habitats is currently ongoing in Wyoming. The referenced material will be reviewed for potential inclusion into the FEIS. Vegetation treatments in identified habitat will be considered for inclusion as potential mitigation.
The Wilderness Society	164-1545	While transmission lines are not generally associated with fences, construction of large vertical structures will likely result in behavioral changes by grouse. Therefore, BLM should require monitoring of fences in the areas adjacent to the line to determine locations where collisions are occurring. We suggest that the proponent target fence-related mitigation to needed areas – specifically, remove or mark identified wildlife hazard fences that are adversely affecting wildlife where opportunities exist, as is broadly suggested in the brief description of the Habitat Equivalency Analysis process (DEIS at 3.8-60). This option was provided in the Miles City RMP, "Fences in high-risk areas (based on proximity to leks, lek size, and topography) would be removed, modified, or marked to reduce outright sage-grouse strikes and mortality." DEIS at 2-49.	Comment noted. Current peer-reviewed literature does not provide significant conclusion substantial evidence that tall structures result in behavioral changes by sage-grouse. Per the Overview of Habitat Equivalency Analysis on page 3.8-60 of the Draft EIA, fence marking is noted as one of multiple mitigation measures for impacts to GRSG to be considered by the lead agencies. Fence marking has also been added to proposed mitigation measure SSWS-5. Determinations of required mitigation will be included in the TWE Record of Decision.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1546	Riparian-wetland areas are a component of brood-rearing habitat for greater sage-grouse because they provide needed forbs and insects necessary for chick survival. Actions that improve riparian-wetlands improve habitats for special status wildlife species, especially increasing the quantity and quality of riparian-wetland vegetation and insects, are critical for sage-grouse. Therefore, we encourage the following as riparian/wetland habitat was inadequately addressed in the DEIS. The Rawlins Field Office had protections to only 500 feet of riparian and wetland areas while the Salt Lake Field Office extended protections out to 1,200 feet. We propose strengthening these: Surface disturbing and disruptive activities should be prohibited within 1,329 feet (0.25 mile) of riparian habitats and 100-year floodplains where mapped. Where unavoidable, the "crossing-specific plans" should include specific language that addresses the avoidance of introducing or expanding invasive nonnative species. Treatment to address INN species is expensive and with uncertain success at best. It involves highly disruptive management with potential for adverse impacts to greater sage-grouse. With limited budgets available for pest treatments, we encourage the BLM to emphasize reducing the likelihood of spread through management actions such as requiring washing of vehicles and limited surface disturbance. This latter suggestion applies to the entire project area, not just riparian areas.	Compensatory mitigation for impacts to sage-grouse habitat will be determined as part of the HEA process. Refer to SSWS-5 for additional sage-grouse impact avoidance and minimization measures. Any additional wetland/riparian set-backs beyond those outlined in the land management agency land use plans would be determined as part of this process. NX-1 to NX-3 will be implemented to minimize impacts from noxious weeds. WET-1 to WET-4 will be implemented to minimize impacts to wetlands and riparian areas.
The Wilderness Society	164-1547	The efficacy of many of the proposed mitigation measures are unknown. Therefore, these should be monitored to not only enable the proponent to modify actions where able but also to broaden our collective knowledge and thus minimize impacts from other proposed high voltage transmission lines. Obligations should be enforced and reports made publically available, thus improving public confidence in the evolving process and management of public/private lands.	Per BLM IM 2013-142 and Interim Policy, Draft - Regional Mitigation Manual Section – 1794, for management of mitigation on non-BLM-managed lands, the BLM should obtain written assurances from the relevant land management agency or surface owner and the authorization holder that mitigation conducted on those lands is agreed to and will receive adequate management, protection, and site access for monitoring during the expected lifetime of the land-use authorization and its associated impacts. These assurances should be in the form of enforceable, binding agreements between private parties and the BLM or similarly detailed commitments (e.g., memoranda of understanding, cooperative agreements) between the Federal agencies and the BLM. Per 40 CFR 1505.2, the Record of Decision (ROD), a monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation (40 CFR 1505.2(c)). The ROD must identify the monitoring and enforcement programs that have been selected and plainly indicate that they were adopted as part of the agency's decision (see Question 34c, CEQ, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, March 23, 1981). The ROD must delineate the monitoring measures in sufficient detail to constitute an enforceable commitment, or incorporate by reference the portions of the EIS that do so (see Question 34c, CEQ, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, March 23, 1981). The Introduction to Appendix C of the Final EIS has been updated to further explain how mitigation measures would be applied and enforced.
The Wilderness Society	164-1552	The DEIS does note at 2-55: "Underground cable systems have been considered and evaluated for the Project. To date, underground cable technology is not commercially available at the very high voltage and capacity levels (i.e., 600-kV and 3,000-MW) required to meet the proponent's objectives. The technology is not presently available, nor is it reasonably foreseeable that it would become available within the time frame for the construction of the Project. While there are theoretical and laboratory experiments in place that could conceivably be applied to the voltage and capacity levels of the proposed Project, there are no AC or DC underground installations worldwide above 500 kV or 2,000 MW either in-service or planned to be in-service in the next decade (TWE 2011). Therefore, undergrounding all or portions of the Project was not considered a viable alternative and has been eliminated from further analysis (Appendix D)." Our organizations respectfully request consideration and analysis be provided for burying distribution lines associated with TWE, as well as modifying existing power lines. These actions would reduce, and in some instances eliminate, perching opportunities for avian predators and collision risks for GRSB.	Distribution lines are not part of the proposed action and, as such, are out of scope of this EIS. Consideration of using common transmission structures with existing infrastructure was considered; information regarding the consideration of modifying existing power lines to accommodate the Project and why this was eliminated from detailed analysis was added to Section 2.7 of the Final EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1553	The TransWest DEIS repeatedly notes that raptors will be among the most impacted species. Raptors are sensitive to environmental disturbance and occupy an ecological position at the top of the food chain; thus, they act as biological indicators of environmental quality. The nesting season is considered the most critical period in the raptor life-cycle because it determines population productivity, short-term diversity, and long-term trends. Therefore serious attention should be paid to the raptor buffers as all raptors are protected under the Migratory Bird Treaty Act. Raptor nest protective buffers (surface-disturbing and disruptive activities subject to seasonal limitations) proposed are inconsistent across the project and inadequate, as was noted for Greater Sage-grouse. Any activity that disrupts breeding, feeding, sheltering, and roosting behavior and causes, or is likely to cause, nest abandonment or reduced productivity is considered disturbance and is a violation of BGEPA. We encourage the BLM to adopt the following protections - prohibiting surface-disturbing activities within 1 mile of Golden Eagle (GOEA) nests and 1 mile for Ferruginous Hawk nests. Our organizations support the specificity of “nests active within the past 7 years” and the inclusion of winter roost sites. We recommend 1 mile buffer for all other raptors nests as well (BLM Special Status Raptors – Burrowing Owl, Swainson’s Hawk, Peregrine Falcon, and Northern Goshawk). The USFWS (USFWS 2002a) identifies courtship, nest construction, incubation, and early brooding as higher risk periods in the life-cycles of raptors when adults are more prone to abandon nests due to disturbance. The USFWS (USFWS 2002a) also indicates that human activities resulting in disturbance to raptors can cause population declines. Therefore, seasonal restrictions and buffers around nest sites are intended to minimize disturbance to GOEA. We recommend that year-round exclusion areas also be considered for use, if circumstances require.	Comment noted. Per Applicant-committed environmental protection measure TWE-32 and others, TransWest has committed to project conformance with all applicable state and federal requirements regarding designated raptor nest avoidance buffers and timing restrictions. Additional mitigation measure WLF-2 would provide similar protections for nesting raptors. Refer to Final EIS Section 3.7.6 and Appendix C, Table C.2-1 and Table C.5-1, for detailed descriptions of these impact avoidance and minimization measures.
The Wilderness Society	164-1554	In reviewing and commenting on the TransWest DEIS, our organizations recommended that the BLM develop a supplemental GOEA document for public review and comment. Given the growing concern for these majestic birds, especially related to mortalities associated with wind farms and expanding transmission infrastructure, any development decisions that will impact GOEA must be placed within a regional population context much larger than the area immediately surrounding any proposed transmission project. In addition, areas out 10 miles from the application area should be evaluated.	Comment noted. TransWest has committed to developing an operational policy and a comprehensive strategy for collecting data, minimizing impacts, and mitigating loss of migratory birds and essential habitats prior to the initiation of construction. This policy and strategy will be incorporated into a single, over-arching document (Avian Protection Plan) that will include a full listing of all minimization measures included in this EIS, as well as recommendations from the USFWS and additional information included within the Avian Protection Plan Guidelines, developed by the USFWS and APLIC in 2005 (APLIC 2012). GOEA will be addressed in the APP. This information is provided in Section 3.7.4.3 Nongame Species (DEIS page 3.7-8).
The Wilderness Society	164-1555	Adequate buffers for GOEA should be in place and monitored to evaluate effectiveness. Compensatory mitigation for retrofitting of lethal power poles in the region should be considered for the first five years of operation. We note that spatial buffers for GOEA nests, as is done for Bald Eagles in most field office planning areas, should be 1.0 miles.	Thank you for your comment. USFWS recommendations on appropriate spatial and temporal nest buffers for the golden eagle have been incorporated into Section 3.7.4.3 of the Final EIS. Due to the wide spacing of conductors (40 - 50 feet) for the proposed Project, there is expected to be little or no risk of avian electrocution and thus, no need for compensatory mitigation of electrocution impacts. Recommendations regarding compensatory mitigation will be reviewed by the BLM and considered for inclusion in the Project's Avian Protection Plan.
The Wilderness Society	164-1570	Segment 140 (Alternative C) - Mexican Flats to Sand Creek Rd. along Hwy 789 corridor - Request consideration of adjusting segment west of Muddy Creek wetlands, before reconnecting with segment 140 south of Muddy Creek Wetlands, to avoid additional cumulative impacts to Muddy Creek and to avoid isolating Muddy Creek between two linear forms of disturbance and obstruction. - Moderate environmental impact – sage-grouse and Muddy Creek wetlands - Runs parallel to Highway 789, in landscape already fragmented by gas development and power lines - Muddy Creek crosses the northern section of this segment and runs parallel to it for the remainder of the segment. Muddy Creek IBA overlaps northern end of this segment, along western edge (high conservation value - see text above). [See Figure WY-2 below] - Project corridor encompasses at least 2 GRSG leks, GRSG 75% regional breeding density polygon1 overlaps most of this segment (indicating high density of leks and breeding birds and of high conservation priority) [See Figure WY-1 below]	Comment noted. Project corridors were refined to avoid impacts to sensitive biological resources.
The Wilderness Society	164-1571	Segment 140.05 (Alternative C) - Request consideration of adjusting location of segment to stay West of Hwy 789 and Muddy Creek, to avoid isolating Muddy Creek between two linear forms of obstruction/disturbance. - Lowest environmental impact - Significant existing development in US Highway 789 corridor, landscape already fragmented by gas development, power lines, rural development - GRSG 75% regional breeding density polygon1 overlaps entire segment (indicating high density of leks and breeding birds and of high conservation priority) [See Figure WY-1 below] - Atlantic Rim field overlaps slightly - Runs parallel to Muddy Creek	The referenced DEIS Segment 140.05 intentionally follows a WWEC designated utility corridor and, as such, was not adjusted in the Final EIS. Potential resource impacts from the Project (including oil and gas development, greater-sage grouse, and water resources) are disclosed in Chapter 3 of the Final EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1582	Colorado Potential Ground Electrode Siting Areas Little Snake East The "Little Snake East" area is unacceptable as any site chosen within this area would have to be located entirely within sage grouse priority habitat, in an area that has some of the highest breeding densities of greater sage grouse in the region (see, "2013 NW Colorado and MWR Lek Count Map" Attached). In addition to the important greater sage grouse habitat, the potential siting area is overlapped entirely with elk winter concentration area, and is important winter habitat for mule deer. The area also overlaps with the Upper Little Snake LWC (see below). The connecting above-ground line would add impacts to the Anthill Draw LWC along its southern end.	Thank you for your comment. Both potential ground electrode siting areas in Colorado were removed from the FEIS due to the concerns noted.
The Wilderness Society	164-1583	Little Snake West: The "Little Snake West" area overlaps with the Upper Little Snake LWC, which was not included in the analysis on LWCs in the DEIS. Additionally, this LWC report is missing from the BLM's Little Snake Field Office's updated Non-WSA Lands with Wilderness Characteristics inventory1 (a duplicate of the Lower Little Snake LWC is included, instead of a full narrative for the Upper Little Snake LWC).	All information provided by the BLM from the 2012 lands with wilderness characteristics inventory available at the time that the TransWest Express Draft EIS was completed was incorporated. BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information has been incorporated into the Final EIS. This comment has been passed along to the BLM Little Snake Field Office regarding the information posted on their website, which is outside the scope of this EIS process. Additionally, the Little Snake West potential ground electrode siting area has been removed from further consideration in the Final EIS at the request of lead agencies in response to public concerns regarding conflicts with resources in that area.
The Wilderness Society	164-1586	Regardless of what is chosen as the proposed action, we expect BLM and the project proponent to employ micro-siting options to locate the line to the further possible extent away from, or to outright avoid, key wildlife habitat such as greater sage grouse leks, brooding and production areas as well as big game migration corridors, production areas and severe winter range.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach.
The Wilderness Society	164-1588	The project must take all steps to avoid siting towers and associated facilities within PPH and any and all surface disturbing and permanent structure should be managed in accordance with the NW CO Greater Sage Grouse EIS.	Comment noted. Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state-required avoidance and minimization or mitigation measures relevant to the greater sage-grouse. The NW Colorado DEIS is currently under review. Depending upon the timing of the completion of both NEPA processes, TWE intends to comply with all applicable conservation measures resulting from the NW Colorado EIS process and other applicable BLM and USFS land use plan amendments for greater sage-grouse conservation that are currently underway. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and Applicant objectives while balancing federal land managers' multiple use mandate.
The Wilderness Society	164-1645	Construction and maintenance should be subject to timing limitations and coordination with Colorado Parks and Wildlife should be conducted to minimize impacts to big game species as well as hunting seasons. Finally, Baseline population data should be provided in order to inform the public, monitor impacts and judge the efficacy of mitigation measures.	Mitigation measures REC-1, 4 and 5 in Section 3.13.6.9 address construction and maintenance activities during big game hunting seasons. Baseline population trend data has been included in FEIS Section 3.7 via reference to the applicable State Wildlife Action Plans (SWAPs).
The Wilderness Society	164-1648	Bitterbrush State Wildlife Area: The Bitterbrush SWA contains some of the highest quality winter range for big game species in the state of Colorado. The SWA has existing disturbances via an existing transmission line and pipeline corridor. Special care must be made to location of the transmission line as well as monitoring the cumulative impacts of multiple disturbances and creating and implementing appropriate mitigation measures.	Potential impacts to Bitterbrush SWA are disclosed in Table 3.13-20 (DEIS page 3.13-36). In their selection of the agency preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and Applicant objectives while balancing federal land managers' multiple use mandate.
The Wilderness Society	164-1649	Raptors: Scant information and analysis is provided concerning the potential impacts to raptors in this and all other potential routes in Colorado due to lack of baseline data. BLM must provide more detailed data on existing populations, locations and acute and cumulative effects in order to provide the public with an adequate level of information to make an informed decision. Waiting to conduct raptor nest surveys until the proposed action is chosen just prior to construction is not appropriate. (DEIS 3.7-46).	Information on raptor nests in the EIS has been solicited and compiled from all BLM and cooperating agencies across the project. This represents the best available information concerning this resource. The EIS has been updated to clarify applicable raptor conservation measures that have been developed in coordination with the USFWS. Pre-construction nest surveys will be performed on the selected alternative to inform the final NTP POD and engineering design. Proposed mitigation in the EIS, if selected, would require construction during raptor breeding and nesting seasons to be avoided. If construction during breeding and nesting seasons cannot be avoided, the applicant would be required to conduct nest activity surveys within 72 hours prior to any ground disturbing activities. In the case that active nests are identified within the project area, appropriate spatial and timing buffers and restrictions would be applied until evidence of nesting completion/fledging.
The Wilderness Society	164-1651	Big game: The segment crosses several types of critical winter range for big game species, including mule deer severe winter range. Timing limitations for construction should be employed to lessen impacts to big game species. Baseline population data should be provided in order to inform the public, monitor impacts and judge the efficacy of mitigation measures.	Comment noted. The applicant has committed to project conformance with all applicable state regulations regarding designated big game crucial winter ranges. This information is provided in Appendix C (DEIS pages C-1 to C-126). Information regarding big game population trends is incorporated in the EIS via reference to the applicable state wildlife management plans.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1652	Segment 180.20 (Alternative 1-A, Applicant-proposed)- Very high environmental impacts- Generally goes through areas with very limited development – “greenfield” route. This route would follow Sevenmile Ridge for much of its extent. Sevenmile Ridge is the dominant geographic feature for the area, forming a stunning western backdrop from the Great Divide area. The route would also impact greater sage grouse habitat and wild horses in the Sandwash basin Horse Management Area. The area has a significant pre-colonial history and cultural resources are prevalent in addition to stunning visual resources. Of greatest concern are the impacts to the Cross Mountain area. In addition to being a Wilderness Study Area (WSA), Cross Mountain is a long-standing citizens’ wilderness proposal (CWP) and this route comes closer to that landscape than any other proposed route, amplifying the concerns about visual resource impacts.- Lands with Wilderness Characteristics: o Reservoir Draw: intersected by the two mile wide corridor and 250’ROW. o Dugout Draw: o Spence Gulch: o West Sevenmile: o Yellow Cat Wash o Sevenmile Draw: o Deep Canyon o Simsberry Draw o Bald Mountain Basin: intersected by the two mile wide corridor and 250’ROW. o Lone Tree Gulch- Greater sage-grouse: This route would impact a significant amount of Preliminary Priority Habitat acreage.; see additional info on segments 180.20 and 180.05 from DEIS below- Visual impacts: Impacts to visual resources along this route would be significant, as this area is lacking any tall structures whatsoever, unlike the Hwy 13 route which follows existing powerlines for much of its length. Additionally, the higher elevation of this route could lead to impacts on a much larger and wider spatial scale. The impacts this route would impart upon Cross Mountain and the Yampa River and its numerous recreationists makes this route highly inappropriate. O Lower Little Snake	Comment noted. The Sevenmile Ridge alternatives included in the Final EIS were revised based on discussions with BLM regarding resource concerns in the area, including those referenced in your comment.
The Wilderness Society	164-1653	- Big game: see additional info on segments 180.20 and 180.05 from DEIS below. Additionally, baseline population data should be provided in order to inform the public, monitor impacts and judge the efficacy of mitigation measures. - Raptors: Lack of specific locational data in the DEIS, though Figure 3.8-2 shows large number of white-tailed prairie-dog colonies which would form a prey base for raptors.	Information on big game population trends will be included in the FEIS via reference to state wildlife population management plans. Depending on the species and location, raptor nest data may be considered sensitive information. Therefore specific location data is not included in the public DEIS.
The Wilderness Society	164-1656	“Option 1” – along existing Bonanza 345 kV line - Lowest environmental impact of the options - Follows existing transmission (250’ separation distance) - Co-location with Gateway South and Zephyr possible - Lands with Wilderness Characteristics: o Crooked Wash: intersected by the two mile wide corridor and 250’ROW. - Impacts to Tuttle conservation easement o Sage-grouse habitat: location of the route should avoid PPH to whatever extent possible. O Big game: In addition to avoiding critical winter habitat, timing limitations on construction should be employed to lessen impacts to elk and mule deer. O White-Tailed prairie dogs (WTPD)/Black footed ferrets (BFF): Prior to the impacts of plague, the Tuttle Ranch had a healthy and stable WTPD population, unlike many other expansive private land holdings in the region. This made the ranch not just suitable for future BFF re-introduction efforts, but ideal because of the ability to manage variables such as recreational shooting and off-highway vehicle use. Once WTPD populations recover, BFF releases will hopefully occur. Siting of the transmission line should be in cooperation with CPW in order to minimize or eliminate impacts to this WTPD population in order to facilitate recovery.	Comment noted. The Tuttle Micrositing Options in the FEIS were revised based on on-going coordination with all agencies with jurisdictional authority or special expertise related to the Tuttle Ranch area (BLM, NPS, NRCS, and CPW).
The Wilderness Society	164-1658	“Option 3” – across Dinosaur NM access road (NPS property) - Very high environmental impacts - Transmission line would span NPS land, need NPS permit - Big game: mule deer · Lands with Wilderness Characteristics: o Twelvemile Mesa: intersected by the two mile wide corridor; 250’ ROW is directly adjacent. O Serious impacts to LWC and Cross Mountain CPW further north along route and corridor.	Comment noted. The Final EIS was revised to provide routing options to address the concerns summarized in your comment. These options were developed based on coordination with all agencies with jurisdictional authority or special expertise related to this area (See Chapter 2 of the Final EIS).
The Wilderness Society	164-1663	In the Little Snake Field Office, the BLM is still in the process of conducting full field inventories of all the draft units—units adjacent to WSAs have not been inventoried in the field. In addition, because the Little Snake field office’s draft inventory was not made public until September 10, 2013—less than three weeks before the comment period deadline for this DEIS—conservation groups, the public, and other interested parties have not had sufficient time to analyze the BLM’s inventory or go into the field to confirm the boundaries and wilderness characteristic determinations that were made. Because of this fact, it is likely that scope and size of the units analyzed in this draft EIS is inaccurate.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information has been incorporated into the Final EIS.

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The Wilderness Society	164-1668	<p>Although we appreciate the BLM's attempt to conduct inventories of the significant acreage of potential LWC lands in this area, the BLM inventory for the LSFO was hastily done and contains many errors. Photos are missing for several units, narratives are missing for at least one unit, and WSA-adjacent units have not been inventoried or analyzed. In addition, the inventory was not made available to the public until Tuesday September 10th, less than three weeks before the comment period deadline for this particular project. That is insufficient time for the public to analyze the inventory, including conducting site visits to assess the inventory's quality, in time to create substantive and meaningful comments on this DEIS. Inventory must be corrected and full inventories completed for all affected units, including WSA-adjacent units and the public given ample time to comment before decisions are made that could affect wilderness characteristics of these units.</p> <p>Recommendation: Due to the significant errors in the LWC inventory conducted by the LSFO and TWE contractors in addition to the lack of adequate time provided by BLM for the public to analyze the LWC inventory in combination with BLM's refusal to grant a comment period extension leads us to the conclusion that BLM must conduct a Supplement to this EIS.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change, much less give rise to a supplemental EIS for this Project. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS, which has since been made available for public review, and that information has been incorporated into the Final EIS.</p>
The Wilderness Society	164-1669	<p>Cherokee Draw (291): BLM found 9600 acres of this unit to contain wilderness characteristics. The applicant proposed and agency preferred corridors (not reference lines) cross through the northwestern-most portion of this unit. This unit contains Powder Wash and a section of the Little Snake River. BLM states that "recreational uses include camping, off-road vehicle use, and hunting." The Cherokee Draw unit contains outstanding opportunities for solitude and primitive and unconfined recreation. Although much of this unit is leased for oil and gas development, no currently producing wells are located within the unit.</p> <p>- Wildlife: Pronghorn migrate through this unit towards the Little Snake river and the Colorado Parks and Wildlife has identified severe and critical winter range for pronghorn along the river. The entire unit is a winter concentration area for mule deer and severe winter range for mule deer exists in northeast corner of the unit. Additionally, the entire unit is either mapped Preliminary-priority habitat (PPH) or Preliminary-general habitat(PGH) for greater sage grouse.</p> <p>- Mitigation: If the final TWE line is constructed through the adjacent Anthill Draw unit, the wilderness characteristics of this unit (Cherokee Draw) should be protected to mitigate for the wilderness characteristics that could be lost in Anthill Draw.</p>	<p>Policy guidance, as established in BLM Manual 6320 section .06, states that "The BLM will evaluate lands with wilderness characteristics through the land use planning process. When such lands are present, the BLM will examine options for managing these lands and determine the most appropriate land use allocations for them. Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) emphasizing other multiple uses as a priority over protecting wilderness characteristics; (2) emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics; (3) the protection of wilderness characteristics as a priority over other multiple uses." Development potential is stated as one of the resource values that should be considered when evaluating wilderness character and potential designation through a land use planning process. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.</p>
The Wilderness Society	164-1670	<p>Anthill Draw (290) - BLM found 7,600 acres of this unit to contain wilderness characteristics. However the BLM's inventory reports that the boundary has been drawn in such a way to "buffer away from noise". BLM Manual 6310 clearly states that, "[w]hen establishing the boundary, do not create a setback or buffer from the physical edge of the imprint of man". In addition, BLM Manual 6310 also states that "Human impacts outside the area will not normally be considered in assessing naturalness of an area". Contrary to the BLM's report, the outside impacts to the Anthill Draw unit are not in any way "major" and do not have direct effects on the apparent naturalness or opportunities for solitude inside of the unit. BLM states that this unit has "excellent" opportunities for unconfined recreation.</p> <p>- Wildlife: The Anthill Draw unit overlaps with some mapped winter concentration and severe winter habitat for mule deer and the entire unit is mapped as PGH for greater sage grouse.</p> <p>- Mitigation: Currently the agency/applicant proposed reference line cuts across this unit from the northeast to southwest. If the line does run through here, the line should be moved as far to the west as possible, to avoid the LWC as much as possible and to decrease the impacts to wilderness-quality lands. Cherokee Draw (291) should also be protected as detailed above.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information has been incorporated into the Final EIS.</p> <p>As stated in Section 3.20.1 of the Draft EIS, Section 201 of FLPMA requires the BLM to maintain, on a continuing basis, an inventory of all public lands and their resources and other values, which includes wilderness characteristics. Section 201 also provides that the preparation and maintenance of the inventory shall not, by itself, change or prevent change of the management or use of public lands. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas. In addition, these concerns have been shared with decision-makers for their consideration.</p>

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1671	Reservoir Draw - BLM found 5800 acres of this unit to contain wilderness characteristics. The Applicant-proposed and Agency-preferred routes diverge within this LWC, with the applicant's proposed route continuing south and west through the eastern edge of the unit; the Agency-preferred route would cut south. The BLM's inventory would cut out the southeast corner of unit (coinciding with the Applicant-proposed route) because of a reported lack of solitude caused by a gravel pit and "oil/gas production". However, while a gravel pit does exist outside of the unit on its southeast side, according to the Colorado Oil and Gas Conservation Commission (COGCC) data, no oil and/or gas wells, either producing or non-producing, currently exist in this area (and BLM includes no photos or other data to indicate otherwise). The gravel pit does not have direct impacts to the naturalness of the unit as a whole that would require removing any of the southeast section of the unit. And while BLM mentions oil and gas leases as an impact to naturalness, BLM Manual 6310 states that, "[u]ndeveloped ROWs and similar undeveloped possessory interests (i.e. mineral rights) are not treated as impacts to wilderness characteristics because these rights may never be developed".- Wildlife: The entire unit overlaps with PPH or PGH for greater sage grouse. The PPH is located in the southern half of the unit under where TWE could intersect. Additionally, this unit abuts the South Nipple Rim State Trust Wildlife Management Area, which indicates the significant wildlife values present in the area. The BLM report also states that this southeast corner is "dominated by extreme topographical relief changes and expansive vistas". The applicant (and agency preferred) route segments along this ridge would be visible for miles to the east, and would have significant visual impacts.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS, and that information was incorporated into the Final EIS.
The Wilderness Society	164-1672	Dugout Draw – While the applicant proposed reference line does not cross into the Dugout Draw LWC, the two-mile corridor overlaps with the entire eastern edge of the unit. This unit was found by BLM to contain wilderness characteristics in all 11,000 acres. The unit has significant and outstanding recreation opportunities, including hiking, hunting, camping, and wildlife observation. The BLM's inventory states, "[t]he area has natural beauty throughout"; "the wildlife in this unit adds to the sense of naturalness"; the site is "relatively undisturbed"; and, "the vast size of the unit allows for solitude and opportunities for primitive recreation even when several people are on site." By any measure, the Dugout Draw unit contains outstanding wilderness values. Although the reference line for the applicant's route lies outside the unit, the line may actually encroach based on final engineering and, if so, this line could have impacts on the wilderness and wildlife values of this priority unit. - Wildlife: Dugout Draw overlaps with the Sand Wash Herd Management Area and wild horses draw relatively large amounts of visitors to the area. Elk production area covers much of the south and west portions of the unit exactly where applicant proposed line would be located. The entire unit is PPH for greater sage grouse.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1673	<p>Spence Gulch – The BLM found all 5,400 acres of the Spence Gulch unit to contain wilderness characteristics according to the map and spreadsheet found in BLM’s inventory. However the inventory write-up (produced by AECOM) says the area doesn’t meet LWC criteria b/c it fails to meet the size criteria. This discrepancy isn’t addressed in either the narrative or the DEIS for this project. No photos are included in the BLM’s inventory for this unit. However, BLM does note that “expansive views and scenery are present”; “the area is quiet with no anthropogenic sounds or visible manmade objects in the area”; “elk bugling was observed” [sic]; and, “excellent opportunities for primitive and unconfined recreation are available throughout the entire unit.” BLM specifically mentions that “[s]cenic values exist throughout the unit due to the vastness of the landscape, deep valley cuts, and prominent dipping mesas”. Both the Applicant-proposed and Agency-preferred routes would cut through this unit, likely resulting in significant impacts to the outstanding wilderness values listed above.- Wildlife: The BLM’s inventory mentions that the unit is “excellent habitat for game, wild horses, elk, and antelope”. CPW data shows that the entire unit is winter concentration area for elk and that elk production areas exist at the higher portions of the unit along Sevenmile Ridge. Mule deer utilize the entire unit for winter concentration areas and greater sage grouse PPH exists in upper elevations of the unit, with PGH near the Little Snake river.- Mitigation: The Applicant-proposed route runs along the western ridge that is the highest elevation portion of this unit. If the applicant proposed route is chosen, much of the scenic and wilderness values described above could be lost as the bulk of the unit lies at lower elevations and below the proposed line and thus the line could be visible for much of the unit. The Agency-preferred route would cut right through the unit and could significantly impact all the wilderness characteristics present within the unit (and likely resulting in a remainder unit smaller than 5,000 acres). If the Agency-preferred route was chosen here, the loss of this unit, along with major impacts to several other LWC units along relatively undisturbed Little Snake River corridor would require extensive mitigation, including the protection of the remaining and unaffected LWCs in the Little Snake valley as well as protection of LWCs on west side of Sevenmile Ridge. Additionally, the loss of recreation values could be mitigated by the purchase of private lands in the Little Snake river corridor to allow for better access to the Little Snake River’s recreational opportunities.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.</p>
The Wilderness Society	164-1674	<p>West Sevenmile – The BLM found that all 6300 acres meet LWC criteria. BLM states that the “large stepping elevation changes seem to isolate one plateau from another both visibly and audibly”; that “the deep canyons are extremely visually-segregated from the rest of the unit”; and that “[t]he area’s unique topography and high relief offer a plethora of opportunities for camping, hiking, and hunting”. The BLM cites the “spectacular visual appeal” of the unit. While the Applicant-proposed route would only clip the uppermost portions of this unit, and the Agency-preferred would cut across the lowest portion of the unit, both of these routes could severely impact the outstanding wilderness characteristics cited by BLM, especially the visual resources.</p> <p>- Wildlife: The unit is both a mule deer and elk winter concentration area. The unit contains elk production areas along western side at the Applicant-proposed route. Mule deer migrate through the unit towards from Sevenmile Ridge to the Little Snake river. PPH for greater sage grouse exists at the upper elevations and PGH for sage grouse has been mapped throughout the unit.</p> <p>- Mitigation: The loss of this unit would be tough to mitigate. The Applicant-proposed route would only cut over topmost edge of unit, but would likely lead to significant damage to visual resources and could be interpreted to lead to loss of solitude and thus loss of wilderness characteristics. The Agency-preferred route could essentially destroy the unit and sever it from the Little Snake River. Mitigation would have to include protection of surrounding and unaffected units, likely on the west side of Sevenmile Ridge.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.</p>

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1675	<p>Sevenmile Draw - The BLM found wilderness characteristics in all 9,800 acres they analyzed. The BLM inventory states that the “landscape was very quiet despite its ease of access from Moffat County Road 75” and that the unit is “suitable for hiking, camping, OHV use, hunting, mountain biking, and other recreational activities”. The BLM report also mentions the visual resources of the unit—the “canyon-like views are visually pleasing”. Despite finding wilderness characteristics in the unit, the BLM fails to make corrections to the boundary of the unit based on findings detailed in its own inventory. The report includes a Route Determination form for “Route 04”—which forms the northwest boundary of the unit and connects CR75 with CR75S—which finds that “Route 04” does not meet the criteria for a Wilderness Inventory Road. Yet, despite this published finding, the BLM fails to delete the boundary and adjust it to a qualifying boundary delineation feature by moving the boundary north to Moffat County Road 75A. This is one of many discrepancies found in the LSFO LWC inventory that is left unexplained and uncorrected and results in an incomplete analysis on the effects of the Applicant-proposed route on LWCs. The Applicant-proposed route would follow the west side of Sevenmile Draw down to the Little Snake River, while the corridor analyzed for the Agency-preferred route overlaps with the eastern half of the unit.- Wildlife: The Sevenmile Draw unit is both production and winter concentration area for elk. Mule deer migrate across the unit down to the Little Snake River, where winter concentration areas for mule deer exist. Additionally, almost the entire unit is PPH for greater sage grouse, with the remaining portions of the unit being PGH.- Mitigation: The Applicant-proposed route would follow the west side of Sevenmile Draw down to the Little Snake River. The construction of this alternative could effectively destroy the wilderness characteristics of this unit. The unit is highly prized by hunters and other recreationalists and offers outstanding primitive camping and hiking. See mitigation for West Sevenmile.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.</p>
The Wilderness Society	164-1676	<p>Lower Little Snake [Applicant and Agency]: The BLM found wilderness characteristics in 7,300 acres of this unit. The Lower Little Snake unit is comprised of most of the public land access to the Little Snake River. Because of its location along the Little Snake River, the unit is crucially important wildlife habitat in the region. While the Agency-preferred route would cut through the northern portions of the unit in areas where the BLM did not find wilderness characteristics, the Applicant-proposed cuts right through the widest and wildest portion of this unit and could eliminate the wilderness characteristics of the unit by causing the remaining portions to no longer meet the size criteria for LWCs</p> <p>- Wildlife: This unit parallels and includes public land sections of Little Snake River. Little Snake is a free-flowing river that is one of the most important wildlife areas in the entire Little Snake Field Office. The Little Snake river has only intermittent public access, so areas where public lands exist on both sides of the river are highly valued by hunters (and wildlife, particularly in winter). The Lower Little Snake unit is both severe winter range and winter concentration areas for elk, mule deer, and pronghorn. Possibly the only place on public lands north of US 40 where this occurs and one of only a few in all of northwest Colorado. The area is also mapped PPH for sage grouse.</p> <p>- Mitigation: The Applicant-proposed route could eliminate this unit from LWC consideration as the route would cross through the thickest portion of this unit (western portion). The Agency preferred would cross the unit at essentially a right-angle, and only in the northeastern portion, minimizing impacts compared to applicant proposed. Mitigating the loss of the unit would be very difficult, particularly when combined with the impacts to other LWCs along both alternative routes north of this unit. Significant acreage of additional LWCs would have to be protected, including any unaffected areas along the Little Snake River.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.</p>

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1677	<p>Deep Canyon: - The BLM found wilderness characteristics in 11,000 acres of this unit. We submit that all 14,200 acres meet LWC criteria as the western boundary proposed by BLM is not a Wilderness Inventory Road according to BLM's own policies. The Deep Canyon unit is likely the most visually stunning LWC in the Little Snake River valley and is a priority for conservation groups. Godiva Rim is one of the most prominent features in northwest Colorado, visible from locations throughout Moffat County. The Agency-preferred route would effectively cut the unit in half and would run a line directly up and over the highest and most visible portions of Godiva Rim. The resulting parcels could be interpreted to lack size, naturalness, or other wilderness characteristics because of the impacts of the line. The BLM's inventory of this unit does not equivocate when detailing the outstanding wilderness and wildlife characteristics of the unit. The BLM states that the "majority of the unit contains beautiful downward slopes dipping to the northwest from Godiva rim"...with deep valleys and creek beds throughout the south and central portions of the unit". The report details the "vast and expansive natural views from Godiva Rim and areas to the north and south"; significant areas of solitude"; "opportunities of primitive and unconfined recreation exist, including camping, hunting, hiking and wildlife observation"; and "expansive nature provides a feeling of being one with nature". The BLM inventory includes relatively expansive narrative on supplemental values including "excellent habitat for big game"; "scenic values" and "unique vistas"; "deep canyons and resistant sedimentary layers are visible throughout the unit". There is no doubt that this unit is exceptional in the LSFO and that running a large transmission line directly up and over the high ridge would have significant deleterious effects on the values listed above.- Wildlife: Elk utilize Godiva Rim for winter concentration and severe winter ranges. In addition, the uppermost elevations of Godiva Rim are elk production areas. Mule deer migrate across and below the rim on the northern side and the lower elevations of the unit are winter concentration and severe winter ranges for mule deer. Pronghorn utilize the very lowest elevations of the unit around the Little Snake River for winter concentration and severe winter range. The area is mapped PGH for greater sage grouse.- Mitigation: This unit stands out in the area as offering outstanding wilderness and wildlife characteristics. The Applicant-proposed route could possibly avoid the Deep Canyon unit by siting the line as far west as possible to avoid impacts to the bulk of the LWC, including the portion that BLM recognizes as containing wilderness characteristics, however the visual impacts of running a line anywhere up Godiva Rim would be very significant and could affect the viewshed of the entire Little Snake Valley from Hwy 318 north because of the elevation profile and topography of Godiva Rim itself. The Agency-preferred route would likely lead to the elimination of the wilderness characteristics of this unit, and would have significant and negative effects on the viewshed of much of the surrounding land.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.</p>
The Wilderness Society	164-1678	<p>Simsberry Draw - The BLM found wilderness characteristics in 6,300 acres. The Applicant-proposed route would cross the unit near its westernmost edge while the Agency-preferred route crosses right through the center of the unit and could eliminate the unit from LWC consideration because of size criteria. The Agency-preferred route also crosses the state land inholding here, the Simsberry Draw STL, which currently allows public access for hunting and wildlife related activities. The BLM's inventory mentions that the "Godiva Rim... is the prominent geological feature in the area"; and that the "[s]cenic values include the unique and substantive views of the surrounding region, which dominate the landscape...including Godiva Rim and its spectacular backdrop for steep sloping expanses of beautiful valley vistas". The inventory also mentions the current "absence of anthropogenic impacts and overall scenery of the unit also contribute to solitude"; and that outstanding opportunities for primitive and unconfined recreation exist "due to its route accesses, beautiful scenery, and evidence of wildlife and hunting opportunities, as well as providing areas for seclusion". - Wildlife: The southern parts of the unit are mapped PPH for sage grouse, while the rest of the unit is mapped PGH. The entirety of the unit is elk production area, elk severe winter range, and winter concentration area for elk. And mule deer use the area as winter concentration and severe winter range.</p>	<p>Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Additional discussion has been added to Section 3.20.6.2 to reference existing applicant committed measures and apply other relevant mitigation measures regarding construction in sensitive resource areas.</p>

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1679	Upper Little Snake [Agency]: The BLM appears to have found wilderness characteristics in 11,500 acres of this unit. A map for this unit is included in the LSFO's inventory of Non-WSA lands with wilderness characteristics, however the report included is for the Lower Little Snake unit; no report for the Upper Little Snake unit is included. It does not appear that this unit was analyzed in the DEIS for this project. No mention of the unit is made, despite the fact that the Agency-preferred would cut through the western portion of the unit and the corridor for this route covers much of the unit. Additionally, both the Little Snake East and Little Snake West ground electrode siting areas overlap with the unit. This unit is a conservation priority as it abuts the large South Nipple Rim STL and together these two units provide unique and important public recreation access to the Little Snake River, along with outstanding wildlife habitat. The unit may in fact connect with the Lower Little Snake unit to the south, as there is no bridge over the Little Snake River (but there may be a ROW associated with the County Road).- Wildlife: The unit overlaps with severe winter range and winter concentration areas for elk, mule deer, and pronghorn, which is a rare occurrence in northwest Colorado.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. Information provided by the BLM field offices was incorporated into the Draft EIS at the time the analysis was completed. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS. Additionally, the potential ground electrode beds have been removed from analysis in the Final EIS at the request of the lead agencies in response to public concerns over resource conflicts in this area.
The Wilderness Society	164-1680	Bald Mountain Basin - Not found to contain wilderness characteristics by BLM because of lack of size, although inventory report is unclear on why the southern half of the unit was removed. No Wilderness Inventory Roads appear to be in this area. Additionally, the BLM report cites range improvements, and proximity to county roads as impacts to naturalness, however photos are not included and according to BLM's own policies outside influences such as limited range improvements within the unit, or county roads outside of the unit, should not impact the area's wilderness characteristics. The BLM's inventory also cites the "potential for significant human activities" as impacts to naturalness, contrary to BLM guidance which states that "BLM must document existing conditions as opposed to potential future conditions."	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS.
The Wilderness Society	164-1681	Serviceberry – BLM found 6,800 acres to contain wilderness characteristics. The two-mile corridor for the Alternative C "Highway 13" alternative crosses into the unit and as such the route could be placed anywhere within the corridor based on siting, and impacts to the unit could occur during construction or maintenance. Impacts to this unit could be minimized by simply moving the line west, closer to existing impacts along Highway 13.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach. The refined corridor under consideration in the Final EIS falls within the western portion of the Draft EIS corridor in this area. The Project would be placed within the confines of this refined corridor. Potential impacts from the Project to lands with wilderness characteristics are disclosed in Section 3.20 of the Final EIS.
The Wilderness Society	164-1682	Little Yampa: BLM found 14,800 acres to contain wilderness characteristics. This area overlaps with the Yampa River Citizen's Wilderness Proposal area (CWP). The unit sits on both sides of the Yampa River and the river through this unit offers one of the premier flatwater canoeing trips in the state of Colorado. The unit offers outstanding camping, hiking, and hunting opportunities. Most of the unit overlaps with the existing Little Yampa Canyon Special Recreation Management Area (SRMA)—a unit that was created to manage for its outstanding recreational opportunities. Impacts to this unit could easily be eliminated by locating the line just slightly north to avoid the LWC unit.	The EIS segment crossing the Little Yampa Canyon SRMA has been shifted to the north through the preliminary engineering efforts that resulted in the narrowed project corridor analyzed in the Final EIS. Potential resource impacts from the Project (including recreation, land use, special designations, and lands with wilderness characteristics) are disclosed in Chapter 3 of the Final EIS.
The Wilderness Society	164-1683	Twelvemile Mesa: BLM found 10,200 acres of this unit to contain wilderness characteristics. However, it does not appear that this unit was analyzed in the DEIS for this project. The micro-siting options presented in the DEIS for this project could impact the southeast corner of this unit and the further north the line ultimately runs after final engineering, the more the outstanding wilderness characteristics of this unit, and associated lands in Dinosaur National Monument, would be degraded.	Information on lands with wilderness characteristics available at the time the Draft EIS was prepared has been incorporated. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS.
The Wilderness Society	164-1684	Peck Mesa: The BLM has not inventoried this potential LWC unit. While it appears that the unit is not adjacent to the Cross Mountain WSA, it does appear to meet the size criteria and as such should be fully inventoried by BLM. Impacts to this unit should be analyzed in the EIS for this project.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. Information available for lands with wilderness characteristics from the BLM was incorporated when the Draft EIS was prepared. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS.

Table L-1 Response to Substantive Comments Received on Draft EIS

Committer Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1685	Cross Mountain Canyon WSA Adjacent Units (CON-010-A35, CON-010_A32, CON-010-A33): BLM has not conducted inventories of the WSA adjacent units and needs to do so before any projects are approved that would degrade wilderness characteristics of the unit. This unit contains the Cross Mountain Canyon Ranch which was recently acquired by the BLM to provide for enhanced recreational access to the Yampa River and the Cross Mountain Wilderness Study Area. The Applicant-proposed route would run directly across this recently acquired parcel and would run just east of the boat ramp and campground at the head of Cross Mountain Canyon. The Applicant-proposed route runs through multiple Cross Mountain WSA-adjacent parcels and would severely degrade these parcels and the WSA to which they are connected along with the documented wilderness characteristics that the WSA contains and the WSA-adjacent LWCs inherit. Impacts to these high priority wilderness quality lands and recreational facilities are unacceptable and further consideration of the Applicant-proposed route through this area (everything south and west of Highway 318) should be abandoned immediately.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS and that information was incorporated into the Final EIS.
The Wilderness Society	164-1686	As described in further detail below, a primary issue with many of the proposed alternative routes is that the respective routes, as currently mapped, encroach upon proposed wilderness areas or Forest Service inventoried roadless areas. Id. Where the route passes near these landscapes, the right-of-way should be modified and the actual route aligned to avoid entering or overlapping with the proposed wilderness units.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS was revised to include details regarding this approach. In the case of inventoried roadless areas, TWE has modified many of the routes as suggested to avoid entering or overlapping with the proposed wilderness units. However, complete avoidance was not possible and, in some cases, the proposed options or routes crossing wilderness units were developed in collaboration with the Forest Service to resolve other resource conflicts.
The Wilderness Society	164-1687	In addition, some segments of the proposed alternative routes fall within existing transmission corridors with existing transmission lines. Furthermore, three statewide transmission lines are currently undergoing environmental review (e.g., Transwest Express, Gateway South and Zephyr). In order to fully consider the cumulative impacts of this project as required by NEPA, BLM must analyze co-locating the Transwest transmission line with other existing and proposed transmission lines in order to minimize impacts.	Consideration and analyses of impacts from past, present, and reasonably foreseeable projects are included in Chapter 5 of the Draft EIS. The lead agencies' for the Energy Gateway South and TWE Projects are considering the potential for collocating these projects as they review their respective EISs.
The Wilderness Society	164-1688	Increased route densities form ORV trails and dirt roads directly conflict with key wildlife habitat such as elk calving grounds. BLM must consider route density reductions in some areas in conjunction with transmission line siting. In practical terms, any route constructed as part of the Transwest transmission project may end up added to the system of unauthorized ORV trails in Utah. Recognizing that restrictions such as administrative use-only are difficult to enforce, BLM must analyze and recommend policies to deter and prevent creation and use of additional routes resulting from the proposed project.	As stated in Section 3.13.6.8 on DEIS page 3.13-34, project access roads would be evaluated on a case-by-case basis by the appropriate federal or state land manager to determine whether to close roads to the public, close and reclaim roads, or leave roads open as part of the transportation network. The text acknowledges that closed roads may be an attractive nuisance and lead to unauthorized OHV use and associated resource damage, noise, etc. Other deterrents such as barriers, contouring, and revegetation may be used to indicate closed roads as determined on a site-specific basis depending on site-specific needs, management requirements, and reasonable application of the treatment. Where appropriate, mitigation measure REC-2 is proposed to limit access to existing roads and/or require reclamation of any new roads. Each BLM Field Office will have to consider existing BLM guidance, policies, and requirements for travel planning when determining the long-term management of project access roads.
The Wilderness Society	164-1689	Finally, BLM must consider impacts to wildlife species and habitat. These include species such as Greater sage-grouse, prairie dogs, black-footed ferrets, Mule deer, Rocky Mountain elk and Rocky Mountain bighorn sheep. The critical issue in much of eastern Utah, where significant amounts of habitat has already been compromised, is "what will a new major impact bring?" Analysis must consider the adequacy of existing habitat to support viable populations of key species as well as options to restore or protect habitat. Where habitat is currently compromised, resiliency for key species and movement to allow adaptation must be ensured before adding any additional impacts.	The DEIS contains a detailed assessment of impacts to the species referenced in this comment. Greater sage-grouse are discussed in Section 3.8.6 Impacts to Special Status Species (DEIS page 3.8-35), Section 3.8.6.1 Impacts form Terminal Construction (DEIS page 3.8-38), Section 3.8.6.3 Impacts Common to All Alternative Routes and Components (DEIS page 3.8-48), Section 3.8.6.4 Region 1 (DEIS page 3.8-49 through 61), Section 3.8.6.5 Region 2 (DEIS page 3.8-81 through 91), and Section 3.9.6.6 Region 3 (DEIS page 3.8-116). Black-footed ferrets and Utah Prairie Dogs are discussed in Section 3.8.6 Impacts to Special Status Species, big game species are discussed in Section 3.7.6 Impacts to wildlife. A complete list of Applicant-committed environmental protection measures and proposed mitigation measures is listed in Appendix C (DEIS page C-1 through 132).
The Wilderness Society	164-1690	BLM must consider the issue of unwanted increased predation resulting from transmission towers. Each tower can lead to a zone of several miles where increased predation can lead to major declines in ground dependent wildlife such as sage grouse.	Comment noted. Discussion regarding the potential for increased predation resulting from increased perching opportunities for raptors and ravens is located in Section 3.8.6.3 Impacts Common to all Alternative Routes and Associated Facilities (DEIS page 3.8-56). Proposed mitigation measure SSWS-5 addresses increased predation through the use of perch discouragers and alternative structure types (DEIS page 3.8-59). SSWS-5 has been refined and augmented for the Final EIS.
The Wilderness Society	164-1693	Furthermore, BLM should consult the Heart of the West Conservation Plan. The Plan identified particular landscapes and designates them as GAP 1 areas that have protective status, GAP 2 areas that deserve protection and additional "solution" areas that have been identified for ecological needs as part of a larger wildlands network. See Heart of the West Conservation Plan, Wild Utah Project, available at http://wildutahproject.org/files/images/HOW-PLAN_lowres.pdf (last visited September 25, 2013).	Comment noted. Thank you for providing this potential source of information. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1694	Alternative Routes 320.10, 320.101, 320.102, 320.103, 320.15, 320.151, 320.152 These segments would be the least environmentally damaging for northern Utah. They are located in existing corridors, which would keep new infrastructure away from sensitive forested high country where there has been minor wind prospecting but for which there is no development as of now.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
The Wilderness Society	164-1695	Alternative Route 217.01: Alternative route 217.01 unnecessarily impacts the Desbrough Canyon ARROWA proposed wilderness unit. [See Map UT-2]. A slight adjustment to the north would be feasible and would result in protection of that area's wilderness characteristics.	The approach being used through the NEPA analysis began with large areas and general Project information, and has progressed to more detailed information as concerns were identified and potential impacts disclosed. This process is further discussed in Chapter 2 of the Final EIS and conforms to the spirit of NEPA by allowing consideration of information as it becomes available and acting as a "funnel" to narrow the areas being considered for development accordingly. Chapter 2 describes the updated separation criteria considered in the Final EIS, which is a general minimum offset of 250-feet from existing transmission lines (decreased from a general 1,500-feet with 250-feet only considered in locations with specific resource or management constraints in the Draft EIS). All alternative alignments and corridors have been adjusted accordingly for the Final EIS. Preliminary engineering efforts are focusing on the agency preferred alternative at this time; however, there are a variety of resource concerns and siting issues at the Green River crossing including special status plant species, special designations, existing utility corridors, and setback distances from existing oil and gas wells in the area.
The Wilderness Society	164-1696	Alternative Route 222.05: Alternative route 222.05 results in unnecessary impacts to lands proposed for wilderness designation in ARROWA, specifically the Price River proposed wilderness unit. [See Map UT-3]. This area has also been identified by BLM as possessing wilderness characteristics. By slightly adjusting the proposed alternative route to the north, aligning it with the existing road, impacts to these wilderness quality lands will be avoided.	The approach being used through the NEPA analysis began with large areas and general Project information and has progressed to more detailed information as concerns were identified and potential impacts disclosed. This process is further discussed in Chapter 2 of the Final EIS and conforms to the spirit of NEPA by allowing consideration of information as it becomes available and acting as a "funnel" to narrow the areas being considered for development accordingly. Chapter 2 describes the updated separation criteria considered in the Final EIS which is a general minimum offset of 250-feet from existing transmission lines (decreased from a general 1,500-feet with 250-feet only considered in locations with specific resource or management constraints in the Draft EIS). All alternative alignments and corridors have been adjusted accordingly for the Final EIS. Preliminary engineering efforts are focusing on the agency preferred alternative at this time; however, this information has been shared with BLM and the applicant to consider if that preference were to change and affect this area.
The Wilderness Society	164-1698	Alternative Routes 470 and 480 The proposed route alignment should be adjusted to avoid clipping boundaries of lands proposed for wilderness designation in ARROWA. Specifically, the proposed route impacts the eastern boundary of the Little Sage Valley and Cat Canyon proposed wilderness units. [See Map UT-6]. These proposed wilderness units possess wilderness characteristics that would be irreparably harmed by the proposed routing. Utilizing alternative route 460 instead of route 470 will alleviate concerns with regard to impacts to the northeastern side of the Little Sage Valley proposed wilderness unit. A minor adjustment to the alignment of alternative route 480 to the southeast is practical, feasible and would avoid impacting the wilderness characteristics of both proposed wilderness units.	The referenced DEIS segments 470 and 480 were developed to follow the WWEC designated utility corridor and, as such, adjustments were only made to portions of these segments collocated with existing transmission lines. Chapter 2 of the Final EIS describes the updated separation criteria, which is a general minimum offset of 250 feet from existing transmission lines (decreased from a general 1,500 feet with 250 feet only considered in locations with specific resource or management constraints in the Draft EIS). Potential resource impacts from the Project (including lands with wilderness characteristics) are disclosed in Chapter 3 of the Final EIS.
The Wilderness Society	164-1699	Alternative Route 490.05 Alternative route 490.05 should be adjusted to avoid clipping the southern boundary of the Paradise Mountains proposed wilderness unit. [See Map UT-7]. This area contains wilderness characteristics that would be irreparably harmed by transmission line encroachment. A minor adjustment of the route to the south east, closer to the existing highway, would avoid impacting this area's wilderness characteristics.	The segment in question was developed to be collocated with a highway to minimize impacts of human structures on undeveloped area. As such, no adjustments were made to the alignment. Potential resource impacts from the Project (including lands with wilderness characteristics) are disclosed in Chapter 3 of the Final EIS.
The Wilderness Society	164-1701	Alternative Route 506 (Pinto Alternative Variation) Alternative route 506 also results in unnecessary impacts to wild, relatively undisturbed public lands within the Dixie National Forest. Furthermore, this alternative will result in unacceptable visual impacts to nearby communities, including historic sites associated with Pinto, Grass Valley and the town and recreation area of Pine Valley. Additionally, while the impacts are not as severe to any one IRA, USFS inventoried Unroaded Undeveloped area or citizen proposed Wilderness area, this easternmost alignment would enter and impacts four distinct such areas. Such extensive impacts are not justified nor balanced with other factors. There is no foreseeable way to further tune or mitigate this alternative's impacts to make it viable as a part of the decision alternative.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. Potential resource impacts from the Project alternatives, including the Pinto Alternative Variation, to cultural, visual, land use, and special designations are disclosed in Chapter 3 of the EIS.
The Wilderness Society	164-1702	Alternative route 501.10 should be located to minimize any adverse impacts to the Mountain Meadows Massacre site. The site, designated a National Historic Landmark in 2011, has cultural and historical significance to Utahans and the nation. Cultural resource surveys and transmission siting should minimize and mitigate any adverse impacts to this sacred site.	DEIS Segment 501.10 has been sited by considering the designated utility corridor and collocation with existing transmission lines to minimize the potential impacts to resources in this area. Section 3.11 of both the Draft and Final EISs discloses the potential impacts to cultural resources and suggested mitigation to minimize those impacts.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1703	Alternative route 502.05 should be adjusted to avoid clipping the northwestern boundary of the Beaver Dam Mountains North and the Beaver Dam Wash proposed wilderness units. [See Map UT-8; Map UT-9]. Although the proposed route falls within the WWEC, the route should be adjusted to avoid impacting lands with wilderness characteristics. Furthermore, since alternative route 502.05 falls within the WWEC, BLM must consider the feasibility of co-locating the Transwest transmission line as close to any existing facilities within that corridor.	The approach being used through the NEPA analysis began with large areas and general Project information and has progressed to more detailed information as concerns were identified and potential impacts disclosed. This process is further discussed in Chapter 2 of the Final EIS and conforms to the spirit of NEPA by allowing consideration of information as it becomes available and acting as a “funnel” to narrow the areas being considered for development accordingly. Chapter 2 describes the updated separation criteria considered in the Final EIS, which is a general minimum offset of 250-feet from existing transmission lines (decreased from a general 1,500-feet with 250-feet only considered in locations with specific resource or management constraints in the Draft EIS). All alternative alignments and corridors have been adjusted accordingly for the Final EIS. Preliminary engineering efforts are focusing on the agency preferred alternative at this time; however, this information has been shared with BLM and the applicant to consider if that preference were to change and affect this area.
The Wilderness Society	164-1704	Additionally, alternative route 502.05 cuts between the Beaver Dam Wash ACEC, designated in 2009 for the protection of the desert tortoise. Any development in this area, which was also identified by the U.S. Geological Survey (USGS) and U.S. Fish and Wildlife Service (USFWS) as highly suitable, high potential desert tortoise habitat, must occur with priority given for protection of the desert tortoise. Relocation of active dens during construction is necessary and habitat will need to be restored to its ecological potential following construction. Finally, towers will increase predation in a zone as much as two miles from the towers. In this zone, in consultation with agency biologists and non-governmental organizations, BLM should recommend measures to avoid or mitigate impacts to the desert tortoise, such as increased predation.	Comment noted. In their selection of the preferred alternative for the TWE project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and Applicant objectives while balancing federal land managers’ multiple use mandate. Per TWE-29 and TWE-31, TransWest has committed to the construction and operation of TWE remaining compliant with all applicable federal and state-required avoidance and minimization or mitigation measures relevant to the desert tortoise. Construction practices and required mitigation within the project area is commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of the ESA section 7 consultation process. No change to text.
The Wilderness Society	164-1708	Although our comments are limited to an analysis of the routes included in the DEIS, there may be alternate routes which do a better job of avoiding impacts to desert tortoise and other protected species, and we encourage the BLM, the Applicant and Western to analyze other routes with desert tortoise impacts in mind. Whichever route is chosen, it is imperative that strict measures be implemented to minimize and mitigate for the impacts.	Comment noted. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate. Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state-required avoidance and protection measures relevant to the desert tortoise. Construction practices and required mitigation within the project area are commonly outlined in the terms and conditions of the official USFWS Biological Opinion resulting from Section 7 consultations. No change was made to the text.
The Wilderness Society	164-1709	I. Recommended off-site mitigation for impacts from Nevada routes: Each of the routes would impact designated desert tortoise habitat. We encourage the BLM to use this as an opportunity to offset impacts to desert tortoise critical habitat and other desert tortoise conservation areas. Recommended mitigation measures include: on-the-ground conservation actions such as land acquisitions, installing protective fencing, retiring grazing allotments, withdrawal of locatable mineral entry, limiting off-highway vehicle access, implementing restoration projects, and continued funding of the Desert Tortoise Conservation Center. With regard to impacts to designated desert tortoise critical habitat, where possible, we recommend habitat loss compensation at a 5:1 ratio. We strongly recommend against any new roads in designated desert tortoise critical habitat, but if it absolutely necessary to construct new roads we recommend they be closed to motorized vehicle use by the public and effectively fenced.	Comment noted. Per TWE-29 and TWE-31, Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state-required avoidance and minimization or mitigation measures relevant to the desert tortoise and other special status species. Construction practices and required mitigation within the project area are commonly outlined in the terms and conditions of the USFWS Biological Opinion issued at the culmination of the ESA section 7 consultation process. No change to text.
The Wilderness Society	164-1712	III. Input, concerns and issues with specific segments in Nevada: 510- Very high environmental impact route – should be eliminated from consideration- A new corridor where no transmission lines currently exist- Much of it can be considered "greenfield" o No existing transmission lines o Some disturbance in the south from a buried line that is in the process of being restored- Very few roads and all of them are lightly traveled and in rough condition- A portion of this line passes through previously un-impacted Mojave desert tortoise Critical Habitat, and it adds further impacts to tortoise non-Critical Habitat that was burned by wildfires in 2005 o Threats from transmission include: avian (largely ravens) predator perches; increased motorized use; human garbage attracting ravens; human harassment and collection- Corridor includes two of three known locations in Nevada for the Desert Valley kangaroo mouse (Microdipodops megacephelus albiventer), a species ranked by the Heritage Program as imperiled (S2). There are only four known locations for this species – 3 in NV (2 potentially impacted by the project), and one in Utah. It is a BLM-NV Special Status Species.	Thank you for expressing your concerns, they will be considered by the BLM and documented in the administrative record associated with this EIS. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and Applicant objectives while balancing federal land managers’ multiple use mandate. Some segments of this alternative can accurately be depicted as greenfield areas where no existing transmission lines occur, while other exhibit significant anthropogenic disturbances. Road conditions and impacts of recent wildfires within Desert tortoise habitat were observed during pedestrian surveys of this alternative in 2013. Mitigation measures addressing avian perching and predation, increased motorized use, and waste management within the ROW have been included in the species-specific measures listed in Section 3.8 Special Status Wildlife. The Desert valley kangaroo mouse is listed as a BLM sensitive species occurring in Region III of the project area in Table 3.8-6 (DEIS page 3.8-8).
The Wilderness Society	164-1713	III. Input, concerns and issues with specific segments in Nevada: - The 510 corridor passes through a western section of Beaver Dam State Park - The corridor runs immediately adjacent to the Clover Mountain Wilderness and within sight of the Mormon Mountain Wilderness, diminishing the quality of experience that these areas were designated to provide - The location is prohibited by the Ely Resource Management Plan since it is a new corridor and other options exist	In their selection of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing the federal land managers’ multiple use mandate. The analysis corridor and potential disturbance areas do not include and are not adjacent to the Beaver Dam State Park. Impacts to Clover Wilderness are disclosed in Section 3.15 (Special Designations). It is BLM policy to encourage prospective applicants to locate their proposals within corridors. Segment 510 is located in a utility corridor designated by the Westwide Energy Corridor Record of Decision (ROD) and the Ely RMP.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1718	III. Input, concerns and issues with specific segments in Nevada: 640, 650, 670, 680, 690, 710, 730 - Very high environmental impact routes – should be eliminated from consideration - These segments would heavily impact the purpose and visual resources of the Lake Mead National Recreation Area; - Parts pass through low to moderate non-critical desert tortoise habitat; - Those segments in the River Mountain Range are in steep and rugged terrain and would result in highly significant impacts to watershed conditions, wildlife habitat (including desert big horn sheep) and visual resource quality.	The resource impacts related to these concerns are disclosed within Chapter 3 of both the Draft and Final EISs. They will be considered by the lead agencies as they make their decision regarding which alternative to implement.
The Wilderness Society Advocates	577-1982	Both proposed ground electrode sites [in Colorado] would have significant impacts to sage-grouse habitat, critical winter range for big game species and areas identified as lands with wilderness character. BLM should instead locate the electrode site in the least environmentally impactful area of Wyoming.	Comment noted. Both ground electrode sites in Colorado were eliminated in the FEIS due to the lead agencies' concerns with resource conflicts.
The Wilderness Society Advocates	577-1983	BLM is required to conduct a complete inventory of all lands with wilderness character prior to conducting projects that may impact those lands. The public has not had adequate time to properly analyze the BLM's recent inventories and study the impacts on this project. The transWest project should not move forward until the new inventories can be analyzed and incorporated in all area plans.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM and are out of the scope of the TransWest EIS process to address or change. However, BLM field offices have been contacted to incorporate any updates to recent lands with wilderness characteristics inventories since the Draft EIS, which has since been made available for public review, and that information has been incorporated into the Final EIS.
The Wilderness Society Advocates	577-1984	The plan doesn't provide the public with a detailed analysis of the impacts of the segments of the proposed routes. Details of these routes and impacts should be made available and analyzed with an eye towards wildlife and visual resource impacts.	A detailed quantitative analysis of disturbance impacts by segment was completed as part of this EIS. However, the analysis was presented by alternative and region in the Draft EIS to facilitate the comparison of the impacts of each complete alternative. To address your concern, the detailed quantitative analysis by segment will be included as an appendix to the Final EIS.
The Wilderness Society Advocates	577-1985	In Colorado, one of the proposed routes would bisect an area with important existing and proposed conservation easements created to preserve unique wildlife resources such as sage grouse. The plan fails to properly consider these legal agreements and the impacts a transmission line would create.	Section 3.14.4.5 and Table 3.14-11 identify one existing conservation easement along the proposed route in Region I (the Tuttle Ranch conservation easement) and disclose the legal agreements associated with this easement. The DEIS analyzed the impact by alternative and evaluated three micro-siting options designed to reduce or avoid impacts to the Tuttle Ranch conservation easement area. Impacts for each option were disclosed in Section 3.14.6.3 (under Alternative I-D). Additional micro-siting options have been developed for inclusion in the FEIS. The analysis in Section 3.14 was augmented to identify the proposed Cross Ranch conservation easement and disclose impacts of the alternatives and micro-siting options to both conservation easements.
The Wilderness Society Advocates	577-1986	In September BLM released another plan proposing new management of Greater sage-grouse habitat. BLM has not provided the public with adequate time to analyze the proposed protections and inter relationships between the TransWest and Sage Grouse plan.	The Final EIS includes a full range of alternatives to ensure that the lead agencies' decision-makers have the ability to choose an alternative that is consistent with any potential final decision on the referenced sage grouse planning effort. The impacts of these alternatives to sage grouse and other resources are disclosed in the Final EIS.
TransWest Express LLC	263-307	There are many instances where TransWest, the applicant, the Applicant, the proponent and the Proponent are used. Please use either "TransWest" or "the Applicant" where appropriate for consistency.	Text has been modified as requested.
TransWest Express LLC	263-308	When discussing the TransWest Express Transmission Project, refer to it as the "TWE Project" or "the Project." The Project should not be referred to as the "TransWest Project."	Text has been revised as requested.
TransWest Express LLC	263-309	When discussing the company, refer to it as "TransWest" or "TransWest Express LLC." For example, in the tables' data sources, revise "TWE" to "TransWest." TransWest is the company providing the data.	Text has been modified as requested.
TransWest Express LLC	263-310	When discussing the corridor, refer to it as the "transmission line corridor." There are many references to the alternative route corridors as being 2-mile wide corridors. Although this is generally the case, the widths will continue to be adjusted for the FEIS to accommodate additional constraints identified, micro-siting and the addition of minor sub-segment route alternatives. Therefore, the reference to the width should be removed.	The FEIS relies upon refined transmission corridors for the disturbance within the ROW, and on refined 2-mile (DIES) corridors for disturbance outside the ROW. The FEIS refers to "refined transmission corridors" and "areas of disturbance outside the ROW," respectively, and the terms and definitions in the glossary have been updated accordingly. The reference to the corridor width has been removed.
TransWest Express LLC	263-311	The term "center line" should be changed to "reference line." This is particularly seen in the Transportation sections of the tables within Section 2.8.2.	The Section 2.8.2 tables in the Final EIS were revised considering this comment.
TransWest Express LLC	263-312	First paragraph in Section 1.4.2.9. It is recommended that the underlined words be added and the strikethrough words be removed: "The Applicant would be responsible for conducting wetland delineations for the proposed routes final route selected and filing the appropriate Section 404 application(s) and other CWA certifications."	Section 1.4.2.9 of the Final EIS was revised to address your comment.
TransWest Express LLC	263-313	Section 2.1.1, Page 2-1 Second dash under fourth bullet. When describing ground electrode facilities, it is recommended that the underlined words be added and the strikethrough words be removed: "Two ground electrode facilities, each sited each connected to the respective terminal with a low voltage electrical line are sited each on approximately..."	The requested edits were made to Section 2.1.1 of the Final EIS.

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Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-314	Section 2.5.1, Page 2-38Middle of first paragraph in Section 2.5.1.Original text: "...fly yards). Facilities considered part of operation and maintenance disturbance include access roads, structure foundation sites and communication sites. These construction and operation areas generally would experience sub-grade disturbance to provide clear, flat work spaces. All construction disturbance not included in operation disturbance (e.g., stringing and tensioning sites, work areas, decrease in structures and communication sites) would be reclaimed. Several facilities would be reclaimed after construction was completed. Areas within the ROW..." This is not an accurate representation of the common and planned construction practices for this Project. Both self-supported (4-leg) lattice and guyed lattice towers are specifically designed to accommodate all terrain types from flat to moderate to steep slopes eliminating the need for large flat work platforms built into sloping terrain. Different length legs (for self-supported towers) and different length guys (for guyed towers) can accommodate all but the most severe side slopes without benching or cutting into the side slope. Additionally the vast majority of the access roads will create surface disturbance only. In a small percentage of the moderate, steep and mountainous terrain, the access roads will require cuts and fill into the side slope which would create sub-grade disturbance. To characterize all disturbances for construction and operation as "generally" creating "sub-grade disturbance" is just not an accurate expectation or representation of the common and planned construction practices for this Project. It is recommended that the underlined sentences be added and to remove the crossed out sentence from the original text: "...fly yards). Facilities considered part of operation and maintenance disturbance include access roads, structure foundation sites and communication sites. These construction and operation areas generally would experience sub-grade disturbance to provide clear, flat work spaces. Operation Disturbance acreages for access roads listed in Tables 2-6, 2-7, 2-8, 2-10, 2-11, 2-12, 2-14, 2-15, 2-16, 2-17, 2-19, 2-20, and 2-21 are identical to the Construction Disturbance acreages for access roads listed in these same tables. The Construction Disturbance acreages are intended to identify temporary disturbances while the Operation Disturbance acreages are intended to identify disturbances for the life of the Project. The Construction Disturbance acreages and the Operation Disturbance acreages are not additive. The vast majority of the disturbance areas calculated for the access roads, stringing and tensioning sites and work areas are anticipated to be surface disturbance only. Only in areas with severe terrain and steep side slopes will benching be required for work areas and cuts and fills required for access roads. The self-supported (4-leg) lattice towers and the guyed lattice towers have been designed to accommodate all terrain types. All construction disturbance not included in operation disturbance (e.g., stringing and tensioning sites, work areas, decrease in structures and communication sites) would be reclaimed. Several facilities would be reclaimed after construction was completed. Areas within the ROW..."	Text in Section 2.5.1 was edited considering the information contained within this comment.
TransWest Express LLC	263-315	Section 3.1.4.1, Page 3.1-4 (Table 3.1-3)In all tables in Section 3.1, use the most up-to-date information as possible. For example, there appears to be outdated values for Table 3.1-3, Monthly Climate Summary for Maybell, Colorado. According to WRCC, the current period of record for Maybell is 6/1/1958 – 2/28/2013, rather than 4/3/1958 – 12/31/2010. Updated climate values can be found on the WRCC website.	It is not feasible in a project of this duration to continually update all data at every stage. The length of climate record is adequate for understanding typical conditions and variations for the region and additional data will not change the conclusions reached from this analysis.
TransWest Express LLC	263-316	Section 3.6.6, Page 3.6-16For the Special Status Plant Species (Section 3.6.6), there are only impacts analyses at the scale of the 2-mile transmission line corridor, as well as project-level impacts analysis only for the construction of the Northern and Southern Terminals. However, most other biological resource sections (e.g., Vegetation, Aquatic Species) have an impact analysis for habitat loss/disturbance at the scale of project impacts (e.g., ROW, operations, maintenance) for the entire TWE Project. It is recommended that the scope of analysis be consistent between all sections.	For the FEIS, the impacts to special status plants have been calculated using consistent methodology as the other biological resources as requested.
TransWest Express LLC	263-317	Section 3.6.6, Page 3.6-16Additionally, the reader cannot figure out on-the-ground impacts based on how it is currently written.	For the FEIS, the impacts to special status plants have been calculated using consistent methodology as the other biological resources.
TransWest Express LLC	263-318	Section 3.6.6, Page 3.6-20SS-4 (Avoidance of Ute ladies'-tresses orchid species and habitat) includes the following statement: "Surface disturbance associated with facilities, access roads, and other Project-related construction activities would not occur within the areas identified as potential habitat or within a 50-foot buffer around known occurrences." However, the same mitigation measure listed in Appendix C (p. C-124) does not include any specific distance, and is stated as follows: "Surface disturbance associated with facilities, access roads, and other project related construction activities would not occur within the areas identified as potential habitat or as having known occurrences." The BLM should make proposed mitigation measures consistent between Section 3.6 and Appendix C.	For the FEIS, additional Ute ladies'-tresses mitigation is identified as measure SS-2. This measure has been updated in Section 3.6.6 of the EIS and carried over into Appendix C, Table C.5-1.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-319	More globally, TransWest noted a number of instances where the DEIS text was different from Appendix C. The BLM should insure consistency between the FEIS and the Appendices and correct any inconsistencies.	All BMPs, DFs, and land use plan stipulations discussed in the analysis sections of the Final EIS were cross-checked with Appendix C to ensure proper citation. All mitigation measures proposed in the Final EIS analysis were recompiled and cross-checked with the list contained in Section C.5 to ensure consistency.
TransWest Express LLC	263-320	Section 3.6.6.4, Page 3.6-33SS-8 is described as: "SS-8: (Avoidance of Deseret Milkvetch Species and Habitat) - Known individuals and populations and areas identified as ground-truthed suitable habitat would be spanned by the transmission line. Surface disturbance associated with facilities, access roads, and other Project-related construction activities would not occur within a 984-foot (300-meter) buffer around the areas identified as having known occurrences or suitable habitat. Presence of species would be assumed for development of USFWS conservation measures as appropriate." Appendix C describes SS-8 as: "(Avoidance of Deseret Milkvetch Species and Habitat) - Known individuals and populations and areas identified as ground-truthed suitable habitat would be spanned by the transmission line. Surface disturbance associated with facilities, access roads, and other project related construction activities would not occur within the areas identified as having known occurrences or suitable habitat. Presence of species would be assumed for development of USFWS conservation measures as appropriate." SS-8 should be re-written so that the two versions are the same. None of the BLM Field Office or National Forest plans provided in Appendix C have any stipulations on Deseret milkvetch, and no buffer is specified.	For the FEIS, additional mitigation specific to Deseret milkvetch has been identified as SS-7. This measure has been updated in Section 3.6.6 and carried over into Appendix C, Table C.5-1 of the FEIS.
TransWest Express LLC	263-321	Section 3.6.6.4, Page 3.6-38SS-9 is described as: "SS-9: (Avoidance of Clay Phacelia and minimization of indirect impacts) – Known individuals and populations would be spanned by the transmission line. Surface disturbance associated with facilities, access roads, and other Project-related construction activities would not occur within a 984-foot (300-meter) buffer around areas identified as having known occurrences. Additional site-specific erosion control measures would be developed with the USFWS and implemented during construction to minimize erosion in areas near known clay phacelia populations. Site-specific construction techniques developed in consultation with the USFWS, BLM, and USFS would be used to minimize the amount of surface disturbance (such as installing structures with helicopter)." Appendix C describes SS-9 as: "(Avoidance of Clay Phacelia and Minimization of Indirect Impacts) – Known individuals and populations would be spanned by the transmission line. Surface disturbance associated with facilities, access roads, and other project-related construction activities would not occur within the areas identified as having known occurrences or suitable habitat. Additional site specific erosion control measures would be developed with the USFWS and implemented during construction to minimize erosion in areas near known clay phacelia populations." SS-9 should be re-written so that the two versions are the same. None of the BLM Field Office or National Forest plans provided in Appendix C have any stipulations on clay phacelia, and no buffer is specified.	For the FEIS, additional mitigation specific to clay phacelia has been identified as measure SS-8. This measure has been updated in Section 3.6.6 and carried over into Appendix C, Table C.5-1 of the FEIS.
TransWest Express LLC	263-322	Section 3.8, Page 3.8-22, Table 3.8-8, Table 3.8-16It should be noted that the Northern Terminal would be located in an area of sagebrush and salt desert shrub communities. There is no possibility for occurrence of river otter, least bittern, white-faced ibis, trumpeter swan or black tern at the location. These species should be deleted from Tables 3.8-8 and 3.8-16.	Comment noted. This list of sensitive wildlife species potentially occurring at the northern terminal was developed based on habitat types present within the northern terminal siting area. The siting area is significantly larger than that footprint of the proposed terminal itself and contains relatively small areas of herbaceous wetland, woody riparian and wetland, and open water habitats, which have some (albeit small) potential to support the species referenced in this comment. Use of the siting area is consistent with lead agency direction for the analysis. Final siting of the northern terminal would avoid direct impacts to aquatic and wetland habitats.
TransWest Express LLC	263-323	Section 3.8.5.2; 3.8.5.9, Page 3.8-23, 3.8-33 (Table 3.8-9, Table 3.8-14)Neither the dark or pale kangaroo mouse is known to occur in Clark County, Nevada.	Text has been revised to address comment.
TransWest Express LLC	263-324	Section 3.8.6.1, Page 3.8-46 (Table 3.8-18)White-tailed prairie dogs are unlikely to occur as far west as Millard County, Utah. The only prairie dog species with potential to occur near the Southern Terminal near the IPP is the Utah prairie dog. Prairie dogs in Utah are heavily tracked and data is available to determine if prairie dogs are located near/within this proposed site.	Text has been revised to address comment.
TransWest Express LLC	263-325	Section 3.8.6.6, Page 3.8-138The conclusion to Region III impacts states that "...The greatest level of impacts to special status wildlife species among all Region III alternatives associated with Alternative III-A is due to greater impacts to greater sage-grouse habitat." This conclusion is not supported by the analysis unless BLM only considers impacts to greater sage-grouse significant. For instance, Alternative III-B has the greatest direct and indirect impacts to desert tortoise potential habitat as well as Southwest willow flycatcher, Western yellow-billed cuckoo, and Yuma clapper rail potential habitat in comparison to the other Region III alternatives (Table 3.8-49). TransWest believes these species are equally important as greater sage-grouse; therefore, BLM's conclusion is not supported by the analysis. It appears that Alternative III-B has the overall greatest impact on special status wildlife species potential habitat. The BLM should revise its conclusion accordingly.	Text has been revised to address comment.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-326	Section 3.9.6.3, Page 3.9-18The text states no loss of habitat, yet some loss of habitat. Specifically, Region 1 conclusion states “no loss or alteration of habitat for the other three alternatives [Alternative I-A, I-B and I-D]....The only potential long-term impacts would be in streams where a culvert would displace stream bottom habitat.” It is recommended to replace “no habitat loss” with “minimal habitat loss (xx square feet), restricted to culverts.” Alternatively, assert that there will be no habitat loss since page 3.4-19 states “Culverts must be a minimum 18-inch diameter and able to pass a 10-year flow event. They typically would be partially buried in the streambed to maintain streambed material in the culvert.”	There would be no habitat loss for Alternatives IA, IB, and ID because culverts would not be used for large rivers such as the Yampa and Little Snake rivers. No revision is required.
TransWest Express LLC	263-327	Section 3.10.6.4, Page 3.10-45According to the DEIS, “A stipulation for the Uinta-Wasatch-Cache National Forest requires that no actions affect cutthroat trout in Tie Fork Creek, Therefore, direct disturbance to habitat or other indirect effects involving sediment or fuel spills would not be allowed in Tie Fork Creek.” However, Alternative II-F (Agency Preferred) would require a crossing of Tie Fork Creek by the 250-foot-wide transmission line ROW in an area of relatively flat terrain. The area is also mapped as clay phacellia modeled habitat where soils are highly erosive. Cutthroat trout are likely to be present. While Alternative II-A also crosses Tie Fork Creek, it does so in the headwaters in steep terrain less likely to contain cutthroat trout. The BLM must reconcile its selection of the Agency Preferred Alternative with the stipulations of the Uinta-Wasatch-Cache National Forest.	The description of the Uinta-Wasatch-Cache management restriction in Section 3.10.6.4 was revised to be consistent with the wording in the RMP, which stated that management actions should be avoided that would significantly reduce habitat for Bonneville or Colorado River cutthroat trout. By implementing erosion control and spill prevention BMPs and design features and mitigation measure SSS-3 (avoid direct disturbance to special status trout spawning habitat), Alternative II-F would not conflict with the RMP management restriction for Tie Fork Creek. In their selection of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate.
TransWest Express LLC	263-328	Section 3.11.4.1, Page 3.11-5: First paragraph in Section 3.11.4.1. It is recommended that the underlined word be added: “...hunter-gatherer campsites, which sometimes represent repeated occupations over thousands of years.”	Text has been added per the comment.
TransWest Express LLC	263-329	Section 3.11.6.1, Page 3.11-18: Second paragraph in Section 3.11.6.1. The following two sentences are phrased poorly: “...the property would be avoided through Project redesign. However, if avoidance is not feasible, adverse effects would be minimized or mitigated...” It is recommended to change the text to: “...the property may be avoided...” or “...the property would be avoided unless avoidance is not feasible...”	Text has been revised per the comment.
TransWest Express LLC	263-330	Section 3.12.6, Page 3.12-13 – 3.12-15 (Figures 3.12-5 – 3.12-7): Figure 3.12-5 does not appear to be an accurate representation of conductor reflectivity and the structures appear to have a higher level of clarity (contrast) than would be expected. Also, the tubular structure at 0.25 miles in Figure 3.12-6 appears too bright, and at the 0.25-mile distance in Figure 3.12-7, the tubular pole is too bright, the guyed structure does not have enough contrast in it, and the guyed structure has too much blur. Therefore, the FEIS should clearly state that the structures shown in Figure 3.12-5 through 3.12-7 are not visual simulations, but graphical representations of the proposed structures. The FEIS should also state that the structures shown in Figures 3.12-6 and 3.12-7 are meant to communicate the relative scale of the proposed structures, and are not meant as an accurate visual simulation of the Project.	The structures have the same reflectivity and clarity as the nearby conductors seen in the same photographs. They are closer to the viewer than the existing structures and conductors and would therefore have additional clarity. The degree of additional clarity is not finite, thus these simulations result from comparisons with similar viewing conditions. The simulations have been modified within tolerances of the surrounding landscape and existing structures/conductors as a result of this comment.
TransWest Express LLC	263-331	Section 3.12.6, Page 3.12-16: This section states as follows: “A significant impact to visual resources would result if any of the following were to occur from construction or operation of the proposed Project: - Visually obvious degradation of the foreground character or scenic quality of a visually important landscape. - Dominant visual changes in the landscape that are seen from highly sensitive viewer locations such as community enhancement areas (e.g., community gateways, roadside parks, viewpoints and historic markers) or locations with special scenic, historic, recreation, cultural, archaeological and/or natural qualities that have been recognized as such through legislation or some other official declaration. - Impacts to visual resources that are not in compliance with the BLM VRM classifications and/or consistent with Forest Service SIO or VQO classifications.” The text is unclear if ‘high’ impacts are considered ‘significant’ impacts. A connection needs to be made between these criteria, and the ‘high’ and ‘moderate’ impacts defined in the analyses. For instance, what constitutes a ‘visually important landscape’? Based on Table 3.12-4 and 3.12-7, would this include Class A and B scenic quality landscapes? TransWest also suggests that the last bullet point be revised to read “Impacts to visual resources that are not in compliance with the adopted BLM VRM classifications and/or consistent with adopted Forest Service SIO or VQO classifications.”	Significance criteria has been removed from the section. The sentence "Impacts to visual resources ..." is revised as suggested.
TransWest Express LLC	263-332	Section 3.14, Page 3.14-1: First paragraph in Section 3.14. Study corridors and their width should be mentioned right after Project analysis area. This way the reader does not have to speculate about how large the Project analysis area is (especially when discussing the crossing of various land use entities).	Section 3.14.3 Analysis Area was moved to the beginning of Section 3.14.
TransWest Express LLC	263-333	Section 3.16.5.1, Page 3.16--15: Second sentence on Utah. The State of Utah is said to evaluate safety “using additional criteria.” Identify the criteria and describe them, as appropriate.	Section 3.16.5.1 was revised to include examples of the additional safety criteria used to create the county highway safety ranking referenced.
TransWest Express LLC	263-334	Section 3.16.6, Page 3.16-16: Delete the second paragraph on this page. The paragraph repeats the analysis area's components that were discussed earlier in the document.	The paragraph was deleted as requested.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-335	Section 3.17.4, Page 3.17-3: Footnote 1 states that three of the Indian reservations “are located at considerable distance from any proposed facilities associated with the TWE project.” Instead of stating “considerable distance,” it is recommended that the approximate distances in miles are provided.	The text was revised to indicate that all three of the reservations are more than 10 miles distant from any of the alternative corridors.
TransWest Express LLC	263-336	Section 3.17.5, Page 3.17-15: The last paragraph on p. 3.17-15 states: “Based on the preliminary construction cost estimates, an assumed value of taxable material and equipment purchases equivalent to 40 to 50 percent of the total project cost and the applicable state tax rates, construction of the entire project would generate sales and use taxes on the order of \$45 million to \$60 million.” Estimated sales and use taxes of approximately \$50 million (in the range set out in the DEIS) are derived as follows. First, it is based on the assumption that 50% of the total project costs estimated at \$3 Billion would be material and equipment purchases. Second, both the state tax rate and the local tax rates were considered, as summarized below: (see Exhibits A-D), (See original pdf of Comment #263, page 7, for additional table comments). Finally, the estimate assumes that Western owns 50% of the TWE Project and does not pay sales and use tax. Based on these three assumptions, the sales/use taxes generated in each state based on the Applicant Proposal are: (See original pdf of Comment #263, page 7, for table comments) Actual sales/use taxes paid may be higher or lower depending on the final route approved for the TWE Project, state and local tax rates, the capital cost subject to tax, and the final ownership structure. (see Exhibits A-D) 1. Economic Analysis Division, Wyoming Sales, Use, and Lodging Tax Revenue Report, 2012. Page 10. http://eadiv.state.wy.us/s&utax/Report_FY12.pdf . There are two Wyoming counties to consider; Carbon County's rate was used as the northern terminal will be located in Carbon County. 2. Revenue Online. Http://www.colorado.gov/revenueonline . Select 'view local sales tax rates' and then type Moffat County. Moffat County is the only county to consider, since it is the only county in which the TWE Project will be located. 3. Combined Sales and Use Tax Rates, May 8, 2013. http://tax.utah.gov/salestax/rate/13q3combined.pdf . 4. Department of Taxation Annual Report, January 15, 2013. Page 14. http://tax.state.nv.us/documents/AnnualReport_FY12_final.pdf . Assumes the rate used in Clark County, which is where the majority of Nevada assets will be located. 5. To account for the assumption that Western owns 50% of the TWE Project and will not pay sales/use tax.	Section 3.17.5 was revised to include additional information on the applicant's estimates of sales, use and ad valorem taxes that were submitted in response to the DEIS -- see Tables 3.17-13 and 3.17-14 (both new) and the full text of comment letter 263.
TransWest Express LLC	263-337	Section 3.17.5, Page 3.17-17: Page 3.17-17 states: “Estimates of the annual ad valorem/property tax revenues during operations were not prepared due to the lack of information needed to project the future assessed value of the transmission system, the multiplicity of individual taxing jurisdictions affected and the respective tax rates that would apply.” TransWest has researched the applicable law and property tax rates in each of the states and estimated the resulting property tax revenues based on TransWest's proposed route, or the Applicant's Proposal. The memoranda outlining the applicable law, tax rates, estimated market value, other assumptions, and the estimated property tax revenues for each of the states are attached as Exhibits A-D. The estimates assume that 50% of the Fair Market Value of the Project is not taxable due to Western owning 50%. TransWest estimates property tax revenues of \$11.4 million to \$15.3 million will be generated just in year one of operations, as summarized in the chart below. Property tax revenues will be generated over the economic life of the Project. (see original pdf for additional table information, page 8, for additional table comments). Actual property taxes paid may be higher or lower depending on the final route approved for the TWE Project, applicable mill levies, the fair market value, and the final ownership structure.	Section 3.17.5 was revised to include additional information on the applicant's estimates of sale and use and ad valorem taxes that were submitted in response to the DEIS -- see Tables 3.17-13 and 3.17-14 (both new) and the full text of comment letter 263.
TransWest Express LLC	263-338	Section 3.17.5.2, Page 3.17-27 (Table 3.17-15): Data for Alternative F is not presented in Table 3.17-15. It is recommended to add a column and present data for Alternative F.	Table 3.17-15 was revised to include all alternatives.
TransWest Express LLC	263-339	Section 3.17.5.3, Page 3.17-34: First paragraph on Decommissioning Impacts. Delete the first paragraph, which states that decommissioning impacts “would occur across all regions ...in multiple locations.” This section is discussing only the ground electrode systems, which only affect Regions I and III.	The text was revised to indicate that socioeconomic effects related to decommissioning would occur in Regions I and III.
TransWest Express LLC	263-340	Section 4.4, Page 4-7 – 4-43 (Table 4-1): Alternatives and analyses need to address the full range of TWE Project facilities on BLM and USFS managed lands, as described in Chapter 2.0. As presently written, it is unclear whether Section 4.0 is addressing plan amendments for the TWE Project as a whole, or only the transmission line. Please clarify.	The section has been clarified to indicate that the proposed plan amendments would address the proposed transmission line and associated facilities.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-341	Section 5.3.6.2, Page 5-29The conclusion for this section states "...for those areas where avoidance is difficult, loss of some sensitive plants is inevitable." TransWest disagrees that loss of some sensitive plants is inevitable. In addition, the "inevitable" loss is not supported by the analysis contained in Section 3.6 – Special Status Plant Species and does not consider applicant committed environmental protection measures or proposed agency mitigation measures. TransWest suggests this statement be reworded to say "...for those areas where avoidance is difficult, loss of some sensitive plants may occur."	The on-going colocation efforts for multiple transmission lines through the areas referenced will be considered in conjunction with any additional applicant committed measures or agency proposed mitigation that will be developed as part of that exercise. Section 5.3.6.2 of the Final EIS was revised as appropriate to disclose the effects on of these changes on risks to sensitive plant species.
TransWest Express LLC	263-342	Appendix C, Page C-82 (Table C.3-26)The species of prairie dog noted for Cedar City Field Office should be the Utah prairie dog, not the white-tailed prairie dog. Please correct.	Table C.3-26 in the Final EIS was corrected to say Utah Prairie dog.
TransWest Express LLC	263-343	Appendix I, Page I-511 - I-518; I-519 - I-526: The map titles for Figure 1-2, maps 1 through 8, need to be clarified and distinguished from the map titles for Figure 1-3, maps 1 through 8. Additionally, all maps should define the scenic quality classes in the key.	The applicable maps define the scenic quality classes in the key. The maps in Appendix I have been reviewed and updated as needed for clarity.
TransWest Express LLC	263-344	Appendix I I-583 - I-590: Based on the text, the analysis of scenic quality changes are part of the impact evaluation. If this is correct, the maps should be titled as 'Impact Maps' or similar terminology.	The methods, results, and titles are based on direction provided by the BLM Project leads.
TransWest Express LLC	263-345	Section 1.4.2.1, Page 1-9, 1-10 (Table 1-3)The dates provided for the current RMPs for the Cedar City, Moab and Salt Lake BLM field offices are not consistent with the tables found in Appendix C. Additionally, for Salt Lake, the most current RMP is dated 2009. Please correct for consistency.	Adoption dates for the Cedar City, Moab and Salt Lake field office RMPs were crosschecked with Appendix C. Appendix C or Chapter 1 of the Final EIS was revised as needed to ensure the information is correct and consistent between the two sections. Please note that the Salt Lake Field Office (SLFO) is governed by 5 Land Use Plans (LUPs): Randolph Management Framework Plan (MFP) (1980), Box Elder Resource Management Plan (RMP) (1986), Pony Express RMP (1990), Park City MFP (1975), and Isolated-Tract Planning Analysis Evaluation (1985). The applicable Plan for this project is the Pony Express RMP (1990).
TransWest Express LLC	263-346	Section 2.1.1, Page 2-1First dash under fourth bullet which describes communications systems. DEIS states 12 to 15 fiber optic communication and regeneration sites, while the PDTR states 15 to 20. Please correct the data.	The correction to Section 2.1.1 of the Final EIS was made.
TransWest Express LLC	263-347	Section 2.4.3.1, Page 2-26last bullet item under Southern Terminal. DEIS states a total of 3 miles of relocation of existing 138/230 kV lines has been identified, while the PDTR identifies this to be 5 miles. Please correct the data.	The correction to Section 2.4.3.1 of the Final EIS was made.
TransWest Express LLC	263-348	Section 2.8.2, Page 2-59 (Table 2-23)Mule deer crucial winter range operation acres for Alternative I-A should be 86 based on data provided in Table 3.7-23 (57 Colorado and 29 Wyoming), not 88 as listed in Table 2-23. Please correct for consistency.	Text in Chapter 2 has been modified to address comment.
TransWest Express LLC	263-349	Section 2.8.2, Page 2-60 (Table 2-23)According to table 3.7-23, both Powder Rim and Muddy Creek Wetlands IBAs will have 2,023 acres impacted for Alternative I-C. However, Table 2-23 indicates that only Muddy Creek Wetlands IBA will be impacted. Please correct for consistency.	Text has been revised to address comment.
TransWest Express LLC	263-350	Section 2.8.2, Page 2-60 (Table 2-23)According to Table 3.7-23, there are 202 raptor nests within 1 mile of Alternative I-D, not 208 as listed in Table 2-23. Please correct for consistency.	The referenced tables been updated to address this comment and reflect the most current alternative alignments.
TransWest Express LLC	263-351	Section 2.8.2, Page 2-60; 2-61 (Table 2-23)The Aquatic Biological Resources consequences for Alternative I-D state that 2 perennial streams will be crossed by the ROW. However, on page 2-58, it states that 4 perennial streams will be crossed. Please correct for consistency.	Perennial stream numbers were revised based on the corridor refinement and checked for consistency with water resources.
TransWest Express LLC	263-352	Section 2.8.2, Page 2-64 (Table 2-23)In Table 2-23, the impact summary for Continental Divide National Scenic Trail (CDNST) Special Recreation Management Area (SRMA), states 1 mile/5 acres (0.8%) and 191 acres (31.8%) of impacts for all alternatives. On page 3.13-37, impacts to CDNST and SRMA lists different numbers. Those numbers include 1.4 miles on BLM lands, 0.1 mile and 1.5 miles on private lands, 4 acres of the 250-foot-wide transmission line ROW, and 179 acres of the 2-mile transmission line corridor, for differing alternatives. Please correct for consistency.	CDNST impact numbers in Table 2-23 were corrected to match the numbers in Table 3.13-20 and text in Section 3.13.6.9.
TransWest Express LLC	263-353	Section 2.8.2, Page 2-65; 2-66 (Table 2-23)It is recommended that the following inconsistencies be corrected: - Region I (Alternative I-A): 7 miles in BLM RMP utility corridors; however, Table 3.14-8 indicates 4 miles in BLM RMP utility corridors. - Region I (Alternative I-B): 18 miles in BLM RMP utility corridors and 37 miles in WWEC; however, Table 3.14-8 indicates 5 miles in BLM RMP utility corridors and 27 miles in WWEC. - Region I (Alternative I-C): 60 miles in BLM RMP utility corridors; however, Table 3.14-8 indicates 17 miles in BLM RMP utility corridors. - Region I (Alternative I-D): 7 miles in BLM RMP utility corridors and 54 miles in WWEC; however, Table 3.14-8 indicates 4 miles in BLM RMP utility corridors and 5 miles in WWEC. - Region I (Alternative I-A): Livestock Grazing - Construction disturbance 5,159 acres and 258 AUMs; however, Table 3.14-8 indicates 2,003 acres and 100 AUMs. - Region I (Alternative I-B): Livestock Grazing -Construction disturbance 5,268 acres and 263 AUMs; however, Table 3.14-8 indicates 2,031 acres and 102 AUMs. - Region I (Alternative I-C): Livestock Grazing -Construction disturbance 4,949 acres and 247 AUMs; however, Table 3.14-8 indicates 1,955 acres and 98 AUMs. - Region I (Alternative I-D): Livestock Grazing -Construction disturbance 5,655 acres and 263 AUMs; however, Table 3.14-8 indicates 2,253 acres and 113 AUMs.	Due to changes to the potential routes, all impact numbers have been recalculated and a thorough cross check was conducted between the Land Use section and the Impact Summary tables in Chapter 2 for consistency.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-354	Section 2.8.2, Page 2-72 (Table 2-24)The value for total PM10 emissions for Alternative II-F in Table 2-24 does not match up with the value for the same alternative provided in calculation tables contained in Appendix E (p. E-3, Table E-4). Table 2-24 provides a value of 211 tons, whereas Table E-4 provides a value of 216 tons. Please correct for consistency.	The commenter is correct. However, the values in Chapter 2 and Appendix E have been revised to reflect changes in the Project description and have been checked for consistency.
TransWest Express LLC	263-355	Section 3.8.2, Page 2-74 (Table 2-24)Based on data provided in Table 3.7-29, mule deer crucial winter range operation acres for Alternative II-E is 381 acres (63 Colorado and 318 Utah acres), not 371 acres as listed in Table 2-24. Please correct for consistency.	All impact acreages have been updated and checked for consistency in the Final EIS.
TransWest Express LLC	263-356	Section 2.8.2, Page 2-74 (Table 2-24)Based on data provided in Table 3.7-29, moose occupied habitat construction acres for Alternative II-A is 220 acres, not 222 acres as listed in Table 2-24. Please correct for consistency.	Text in Chapter 2 has been modified to reflect the updated analyses of refined transmission corridors, addressing this comment.
TransWest Express LLC	263-357	Section 2.8.2, Page 2-75 (Table 2-24)Based on data provided in Table 3.7-30, 2 MIS species' habitat will be crossed by Alternative II-A, 4 MIS species' habitat will be crossed by Alternative II-D, 5 species' habitat will be crossed by Alternative II-E, and 11 species' habitat will be crossed by Alternative II-F. This differs from the information in Table 2-24. Please correct for consistency.	Text in Chapter 2 has been modified to address comment.
TransWest Express LLC	263-358	Section 2.8.2, Page 2-107 (Table 2-25)Based on data in Table 3.7-36, Alternative III-C construction will impact 10,327 acres of small game, nongame habitat, not 10,318 acres as listed in Table 2-25. Please correct for consistency.	Text in Chapter 2 has been modified to address comment.
TransWest Express LLC	263-359	Section 2.8.2, Page 2-107 (Table 2-25)Based on data in Table 3.7-36, there are 137 raptor nests within 1 mile of Alternative III-C, not 199 raptor nests as listed in Table 2-25. Please correct for consistency.	Text in Chapter 2 has been modified to address comment.
TransWest Express LLC	263-360	Section 2.8.2, Page 2-107 (Table 2-25)Based on data in Table 3.7-38, Alternative III-B and III-C will not cross habitat by any MIS species. Table 2-25 indicates they will both cross habitats of 2 MIS species. Please correct for consistency.	Text in Chapter 2 has been modified to address comment.
TransWest Express LLC	263-361	Section 2.8.2, Page 2-107 (Table 2-25)The resource heading for desert bighorn sheep indicates that it only includes Nevada acres, but based on the data provided in Table 3.7-36, acres from both Nevada and Utah are presented. Please update the resource heading.	Text in Chapter 2 has been modified to address comment.
TransWest Express LLC	263-362	Section 2.8.2, Page 2-113; 2-114 (Table 2-25)It is recommended that the following inconsistencies be corrected: - Region III (Alternative III-A): 65 miles in BLM RMP utility corridors and 146 miles in WWEC; however, Table 3.14-19 indicates 68 miles in BLM RMP utility corridors and 153 miles in WWEC. - Region III (Alternative III-B): 101 miles in BLM RMP utility corridors and 47 miles in WWEC; however, Table 3.14-19 indicates 65 miles in BLM RMP utility corridors and 77 miles in WWEC. - Region III (Alternative II I-C): 64 miles in BLM RMP utility corridors and 45 miles in WWEC; however, Table 3.14-19 indicates 41 miles in BLM RMP utility corridors and 45 miles in WWEC. - Region III (Alternative III-A): Livestock Grazing -Construction disturbance 9,304 acres and 465 AUMs; however, Table 3.14-19 indicates 3,552 acres and 178 AUMs. - Region III (Alternative III-B): Livestock Grazing -Construction disturbance 8,522 acres and 426 AUMs; however, Table 3.14-19 indicates 3,211 acres and 161 AUMs. - Region III (Alternative III-C): Livestock Grazing -Construction disturbance 9,438 acres and 472 AUMs; however, Table 3.14-19 indicates 3,533 acres and 177 AUMs.	Due to changes to the potential routes, all impact numbers have been recalculated and a thorough cross check was conducted between the Land Use section and the Impact Summary tables in Chapter 2 for consistency.
TransWest Express LLC	263-363	Section 3.5.6.3, Page 3.5-40First paragraph on Key Parameters Summary for Alternative I-A. "I-40" should be corrected to "US-40." I-40 does not exist in Colorado.	Text will be updated to correct the road name.
TransWest Express LLC	263-364	Section 3.5.6.4, Page 3.5-51First paragraph on Key Parameters Summary for Alternative II-C. Acres stated in text for aspen forest and woodlands is 237 acres for Alternative II-C. This does not correlate with Table 3.5-17, which lists 49 acres for aspen forest and woodlands for Alternative II-C. Please correct for consistency.	The text has been reviewed and updated in the Final EIS for consistency.
TransWest Express LLC	263-365	Section 3.6.1, Page 3.6-1Third sentence of first paragraph. "Nevada Administrative Code 501.100-503.104" should be corrected to "Nevada Administrative Code 527.270 and Nevada Revised Statutes 527.010". The code listed in the DEIS is incorrect since it refers to wildlife instead of plants.	The sentence has been updated as requested.
TransWest Express LLC	263-366	Section 3.6.4, Page 3.6-1; 3.6-2First paragraph in Section 3.6.4. The baseline description says there are 304 special status plant species that were evaluated for potential occurrence, and that this information is summarized in Appendix G, Table G-1. It also says there were 162 special status plant species eliminated from analysis and 140 special status plant species carried forward. After manually checking these numbers in Appendix G, Table G-1, it appears there is a total of 289 special status plant species, of which 158 were eliminated from analysis and 131 were carried forward. Please verify and correct here and elsewhere in this document and related documents where this error may have been copied.	The text has been reviewed and updated as appropriate in the Final EIS for consistency.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-367	Section 3.7.6.3; 3.8.6.4, Page 3.7-55; 3.8-56 (Table 3.7-24; Table 3.8-24) Table 3.7-24 and Table 3.8-24 present differing amounts of unknown raptor species nests for Alternatives I-C and I-D. For Alternative I-D the difference is quite substantial (69 nests compared to 177 nests). Please correct for consistency.	Raptor nest data have been re-analyzed with the new alternative alignments. Text in sections 3.7 and 3.8 has been modified accordingly.
TransWest Express LLC	263-368	Section 3.6.4.1, Page 3.6-9 First paragraph on BLM Sensitive, Forest Sensitive, and Nevada State Listed Species. The numbers of special status plant species appear to be incorrect. If there were 131 species carried forward for analysis (see prior comment above), of which 18 were federally listed, candidate, or proposed, then there should be only 113 BLM sensitive, USFS sensitive, NPS sensitive or Nevada state-protected species—and not 132 species as stated here. Please correct the data.	The text has been reviewed and updated as appropriate in the Final EIS for consistency.
TransWest Express LLC	263-369	Section 3.6.4.1, Page 3.6-9 (Table 3.6-1) Correct and verify the numbers listed in Table 3.6-1 Special Status Plant Species Summary by Project Region. Need to also check the species listed in Tables 3.6-2, 3.6-3, 3.6-4 and 3.6-5 to make sure these species lists are consistent with the numbers of plants and as seen in Appendix G, Table G-1.	The text has been reviewed and updated as appropriate in the Final EIS for consistency.
TransWest Express LLC	263-370	Section 3.6.6.5, Page 3.6-63 First paragraph in Section 3.6.6.5. Recommend verifying the number of plant species due to conflicts in the numbers. There can't be 5 Nevada state listed species when the table below (Table 3.6-13) says there are 6 Nevada state listed species with potential habitat impacted.	The text has been reviewed and updated as appropriate in the Final EIS for consistency.
TransWest Express LLC	263-371	Section 3.6.6.6, Page 3.6-76 First paragraph in Section 3.6.6.6. Recommend verifying the number of plant species due to conflicts in the numbers. There can't be 18 BLM sensitive species when at least 19 BLM sensitive species are listed in Table 3.6-17. In addition, there can't be 8 NPS-Lake Mead NRA sensitive species when there are only 2 NPS Lake Mead NRA sensitive species listed in Table 3.6-17.	The text has been reviewed and updated as appropriate in the Final EIS for consistency.
TransWest Express LLC	263-372	Section 3.7.6.1, Page 3.7-40 Fourth and fifth paragraphs. Text state that the raptor breeding season is Jan 1 – July 31 for most eagles, hawks, falcons, and owls. However, WLF-1 (at the bottom of the page) states that it's Jan 1 – August 31 for most eagles, hawks, falcons, and owls. Please use consistent date ranges.	Comment noted. Section 3.7 has been updated to reflect the range in raptor breeding dates throughout the analysis area. WLF-1 has been updated to provide an overall date range for the avian breeding season as well as indicate the variability in breeding dates by species, geography, and environmental factors. WLF-2 has been added to provide similar mitigation specific to raptors.
TransWest Express LLC	263-373	Section 3.7.6.1, Page 3.7-40; 3.7-41 Fifth paragraph. The migratory bird breeding season is the exact same as the raptor breeding season and uses raptor species as the examples. On the following page, a breeding bird survey season of Feb 1 – July 31 is mentioned. For consistency, remove the raptor references and insert non-raptor migratory bird examples. This appears to be a copy/paste error.	Thank you for your comment. Section 3.7 has been updated to reflect the variability in migratory bird (including raptor) breeding seasons throughout the analysis area.
TransWest Express LLC	263-374	Section 3.7.6.1, Page 3.7-41 First paragraph on Southern Terminal Habitat Disturbance and Fragmentation. "Interstate Highway 95" should be corrected to "Highway 95." Interstate 95 does not exist in the area.	Text in Section 3.7 has been modified to address comment.
TransWest Express LLC	263-375	Section 3.7.6.2, Page 3.7-41; 3.7-46 In the first paragraph on page 3.7-41 the dates Feb 1 – July 31 are called out for breeding bird surveys. These dates are also stated in WLF-1. In the third paragraph of page 3.7-46, the breeding season is stated as March 1 – July 31. On page 3.7-9, it states that migratory bird breeding season is Jan 1 – Aug 15. If there is a reason for using different dates, this needs to be stated clearly. Otherwise, please use consistent date ranges.	Section 3.7 has been updated to reflect the variability in avian breeding dates by species, geography, and other environmental factors. WLF-1 has been revised and identifies a standard date range of February 1 to July 31 but also notes that actual breeding dates may vary widely depending on a variety of factors. WLF-2 has been added to provide similar mitigation specific to raptors.
TransWest Express LLC	263-376	Section 3.7.6.2, Page 3.7-47 The first paragraph states that WLF-1 will require TransWest to avoid habitat removal from March 1 - July 31. WLF-1 refers to February 1, not March 1. Please use consistent date ranges.	The text of Section 3.7 has been updated to reflect the variability in avian breeding dates by species, geography and other environmental factors. WLF-1 now identifies a standard date range (February 1 to July 31) across the analysis area but notes the variability in the timing of breeding and nesting activities with the intent that this measure should be applied based on species, location, and current conditions.
TransWest Express LLC	263-377	Section 3.7.6.3; 3.8.6.4, Page 3.7-55; 3.8-56 (Table 3.7-24; Table 3.8-24) Table 3.7-24 and Table 3.8-24 present differing amounts of unknown raptor species nests for Alternatives I-C and I-D. For Alternative I-D the difference is quite substantial (69 nests compared to 177 nests). Please correct for consistency.	Raptor nest data presented in the FEIS will be revised with the updated project alignment and associated components.
TransWest Express LLC	263-378	Section 3.7.6.5, Page 3.7-86 In the first sentence under Alternative III-A, add "and Nevada" to the end of this sentence since this alternative crosses Utah and Nevada.	Text in Section 3.7 has been modified to address comment.
TransWest Express LLC	263-379	Section 3.7.6.5, Page 3.7-90 In the first sentence under Alternative III-B (Agency Preferred), add "and Nevada" to the end of this sentence since this alternative crosses Utah and Nevada.	Text in Section 3.7 has been modified to address comment.
TransWest Express LLC	263-380	Section 3.7.6.5, Page 3.7-91 In the first sentence under Alternative III-C, add "and Nevada" to the end of this sentence since this alternative crosses Utah and Nevada.	Text in Section 3.7 has been modified to address comment.
TransWest Express LLC	263-381	Section 3.8.6.4, Page 3.8-50 (Table 3.8-20) Lek data for Wyoming and Colorado presented in Table 3.8-20 for all alternatives in Region I do not appear to be the most current data available. TransWest requests that the table be revised in the FEIS to incorporate the most current data on leks in that Region. This comment also applies to the summary tables (2-23 to 2-27) in Chapter 2.	Thank you for your comment. Sage-grouse lek data has been updated for the FEIS.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-382	Section 3.8.6.4, Page 3.8-73The last paragraph addresses Alternative I-A. This appears to be a mistake and should be corrected to Alternative I-D.	Text has been updated to address comment.
TransWest Express LLC	263-383	Section 3.8.6.6, page 3.8-124 Third paragraph on Greater Sage-grouse (Candidate). The numbers of acres of greater sage-grouse habitat potentially disturbed by Alternative III-A (346 acres for construction and 73 acres for operations) is inconsistent with Table 3.8-44. Table 3.8-44 shows 115 acres of Utah occupied habitat potentially disturbed by construction and 24 acres potentially disturbed by operations. The footnote to Table 3.8-44 indicates that occupied habitat includes brood-rearing and wintering habitats. It appears that BLM may have erroneously added occupied habitat plus brood-rearing habitat plus wintering habitat (115 X 3 = 345). Please correct the text to state that potential habitat disturbance would be 115 acres for construction and 24 acres for operations as shown in Table 3.8-44.	Text has been updated to address comment.
TransWest Express LLC	263-384	Section 3.8.6.7, Page 3.8-141 (Table 3.8-55) Footnote references Region I while the table is presenting information on Region IV. Please correct reference.	Text has been updated to address comment.
TransWest Express LLC	263-385	Section 3.9, Page 3.9-1 Throughout this section, stream counts do not match with Appendix F and Section 3.4. Please verify the data.	Perennial stream numbers were revised based on the corridor refinement and checked for consistency with water resources. One notable difference between Section 3.9 (Aquatic Biological Resources) and 3.4 (Water Resources) is that number of perennial streams in 3.9 only includes named streams, while 3.4 includes both named and unnamed perennial streams.
TransWest Express LLC	263-386	Section 3.15.1, Page 3.15-1The following sentence, located in the Data Sources section, appears to be in the wrong section and should be moved as appropriate: "Vegetation species are presented in a manner consistent with the NRCS Plants Database (NRCS 2010), unless otherwise specified."	The sentence was removed from Section 3.15.1.
TransWest Express LLC	263-387	Section 3.16.1.3, Page 3.16-4: Second bullet. The DEIS states: "A "No-hazard Declaration" is required by the FAA if a structure is more than 200 feet in height according to the FAA Act of 1958 (FAA 2011) (PL 85-726) (14 CFR 77)." The original statement is not accurate, as the 1958 Act was repealed when Congress recodified aviation legislation in 1994. It should be corrected to: "The FAA can issue a Determination of No Hazard if the structure exceeds obstruction standards but does not result in a substantial adverse effect, as seen in 14 C.F.R. § 77.31(d) & (e)."	This correction was made as requested.
TransWest Express LLC	263-388	Section 3.16.5.1, Page 3.16-15: Paragraph on Utah. There are 14 Utah counties that the alternative routes cross. "Utah: Out of the 13 counties..." should be corrected to "Utah: Out of the 14 counties..."	This edit was made as requested.
TransWest Express LLC	263-389	Section 3.17.5, Page 3.17-13 (Figure 3.17-2): The projected construction start dates for the Northern and Southern Terminals begin only a few weeks after Spread 1. The PDTR states that construction for these terminals would start approximately 3 to 6 months after transmission line construction. It is suggested to move the terminals' start dates in Figure 3.17-2 to the right, closer to the 26 week mark.	The figure was revised to reflect the updated information provided by the applicant. Figure 3.17-5 was also revised.
TransWest Express LLC	263-390	Section 3.17.5, Page 3.17-14 (Table 3.17-10): The total mileage of the Agency Preferred route is listed as 795 miles and the total mileage of Alternative A is listed as 727 miles. However, the Reader Letter states the Agency Preferred route is 760 miles (p. 2) and the Executive Summary states the Proposed Action is 725 miles (p. ES-5). Please correct for consistency.	In both instances noted in the comment, the discrepancies in cited lengths were not material to the public's understanding or comments between the alternatives. The text was revised to reflect the route miles associated with the final routes in this document.
TransWest Express LLC	263-391	Section 3.17.5, Page 3.17-16 (Table 3.17-12): The Utah state sales and use tax rate is incorrect. The table lists a 4% state sales and use tax rate, but the reference listed provides a state sales and use tax rate of 4.70%. This error causes the sales and use taxes to be underestimated. Furthermore, there is an updated reference which is effective July 1, 2013.7 Please correct the data. (see Exhibits A-D) Footnotes:6 Utah Code Title 59, Chapter 12 Combined Sales and Use Tax Rates, effective October 1, 2011. http://tax.utah.gov/salestax/rate/11q4combined.pdf 7 Utah Code Title 59, Chapter 12 Combined Sales and Use Tax Rates, effective July 1, 2013. http://tax.utah.gov/salestax/rate/13q3combined.pdf	The referenced table was revised. The reference cited in the DEIS remains valid as the state sales tax rate did not change in the intervening period.
TransWest Express LLC	263-392	Section 3.17.5, Page 3.17-17: Based on the mapping, Region III does not include Alternatives D, E, and F. In Figure 3.17-4, "Alternatives D, E, and F corridors in Regions I, II, and III" should be corrected to "Alternative D in Region I and Alternatives D, E, and F in Region II."	The referenced tables, figure, and the associated text were revised to reflect the final alignments in the FEIS.
TransWest Express LLC	263-393	Section 3.17.5.2, Page 3.17-24: First paragraph on Construction Impacts. "The number of counties affected under Alternatives B through F are 16, 15, 15, 9, and 9, respectively (Table 3.17-14)" should be corrected to "The number of counties affected under Alternatives B, C, D, E, and F are 15, 15, 11, 10, and 9, respectively (Table 3.17-14)."	The table and accompanying text were updated to reflect the alignments in this document.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-394	Section 3.17.5.2, Page 3.17-24 (Table 3.17-14): Alternative B is listed as being in Washington County, when Figure 2-23 indicates that it is not in this county. Alternative D is listed as being in Beaver, Iron, Lincoln, and Clark counties, when Figures 2-23 and 2-24 indicate that it is not in these counties. In the Routing Variations column, the variations are listed as not being in Duchesne, Wasatch, and Utah counties, when Figure 2-22 indicates the route variations are in these counties. Review Figures 2-21, 2-22, 2-23 and 2-24 to make sure the corridors correctly correspond to the counties crossed.	The table, figures and associated text were revised to insure consistency with the final corridor route mapping established for the FEIS.
TransWest Express LLC	263-395	Section 3.17.5.2, Page 3.17-27 (Table 3.17-15): For Alternatives A, B, and C, no combination of numbers in each column adds up to the total listed at the bottom of each column, even when adjusted to avoid double-counting of Clark County. It is recommended to correct the totals.	The table and accompanying text were updated to be consistent with the alternative alignments in the FEIS.
TransWest Express LLC	263-396	Section 3.17.5.2, Page 3.17-30: Second sentence of the second paragraph. There are four states that alternative corridors would cross. "...primarily to the three state treasuries" should be corrected to "primarily to the four state treasuries."	The text was corrected to acknowledge that sales and use tax revenues from the project would accrue to the treasuries of four states.
TransWest Express LLC	263-397	Section 3.17.5.4, Page 3.17-38 (Table 3.17-20): Row regarding Separation Creek in Table 3.17-20. "I-15" should be corrected to "I-80."	The text was corrected to refer to Interstate 80.
TransWest Express LLC	263-398	Section 3.18.7.2, Page 3.18-16 First paragraph on Occupational Safety. "...adherence to NESC, U.S. Department of Labor requirements, and OSHA safety standards" should be corrected to "...adherence to NESC and OSHA safety standards."	Text within Section 3.18.7.2 was amended to state that OSHA is a part of the U.S. Department of Labor.
TransWest Express LLC	263-399	Section C.3.2.14, C-85 Heading for Section C.3.2.14. The Ely District/Caliente Field Office is in Nevada, not Utah.	The heading for Section C.3.2.14 in the Final EIS was corrected to indicate the Ely District/Caliente FO is in Nevada.
TransWest Express LLC	263-400	Section 3.3.2.15 C-87 Heading for Section C.3.2.15. The Las Vegas Field Office is in Nevada, not Utah.	The heading for Section C.3.2.15 in the Final EIS was corrected to indicate that the Las Vegas FO is in Nevada.
TransWest Express LLC	263-401	Section 3.8.4.1, Page 3.8-13 First sentence of first paragraph. PPH should be added to the Abbreviations and Acronyms list.	Text has been updated to address comment as appropriate.
TransWest Express LLC	263-402	Section 3.8.4.1, Page 3.8-13 First sentence of first paragraph. PGH should be added to the Abbreviations and Acronyms list.	Text has been updated to address comment.
TransWest Express LLC	263-403	Section 3.8.4.1, Page 3.8-13 First sentence of second paragraph. NTT should be added to the Abbreviations and Acronyms list.	Text has been updated to address comment.
TransWest Express LLC	263-404	Section 3.8.4.1, Page 3.8-13 First sentence of second paragraph. NTT should be added to the Abbreviations and Acronyms list. 3.8.4.1 3.8-14 Last sentence of paragraph on Overall Species Range. PMU should be added to the Abbreviations and Acronyms list and defined when first used in the chapter.	Text has been updated to address comment.
TransWest Express LLC	263-405	Section 3.8.4.1, page 3.8-15 First paragraph on Gray Wolf. NEP should be added to the Abbreviations and Acronyms list.	Text has been updated to address comment.
TransWest Express LLC	263-406	Section 3.8.4.1, Page 3.8-16 First paragraph on Western Yellow-billed Cuckoo (Candidate). DPS should be added to the Abbreviations and Acronyms list.	Text has been updated to address comment.
TransWest Express LLC	263-407	Section 3.8.6.4, Page 3.8-60 First paragraph on Overview of Habitat Equivalency Analysis. HEA should be added to the Abbreviations and Acronyms list.	Text has been updated to address comment.
TransWest Express LLC	263-408	Section 3.8.6.5, Page 3.8-100 First paragraph on Black-footed Ferret (Endangered; EXP/NE). PMZ should be added to the Abbreviations and Acronyms list.	Text has been updated to address comment.
TransWest Express LLC	263-409	Section 3.9.2, Page 3.9-1 Paragraph in Section 3.9.2. WYNDD should be added to the Abbreviations and Acronyms list and defined when first used in the chapter.	The text of Section 3.9.2 and the Abbreviations/Acronyms List has been modified as requested.
TransWest Express LLC	263-410	Section 3.9.2, Page 3.9-1 Paragraph in Section 3.9.2. CNHP should be added to the Abbreviations and Acronyms list and defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-411	Section 3.9.2, Page 3.9-1 Paragraph in Section 3.9.2. UNHP should be added to the Abbreviations and Acronyms list and defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-412	Section 3.9.2, Page 3.9-1 Paragraph in Section 3.9.2. NNHP should be added to the Abbreviations and Acronyms list and defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-413	Section 3.12.1.2, Page 3.12-1 Paragraph in Section 3.12.1.2. VRM is listed in Abbreviations and Acronyms list, but it needs to be defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-414	Section 3.12.1.3, Page 3.12-2 Paragraph in Section 3.12.1.3. SIO is listed in the Abbreviations and Acronyms list, but it needs to be defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-415	Section 3.12.1.3, Page 3.12-2 Paragraph in Section 3.12.1.3. VQO is listed in the Abbreviations and Acronyms list, but it needs to be defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-416	Section 3.12.1.5, Page 3.12-2 Paragraph in Section 3.12.1.5. NHPA is listed in the Abbreviations and Acronyms list, but it needs to be defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-417	Section 3.12.2.1, Page 3.12-2 First paragraph in Section 3.12.2.1. VRI is listed in the Abbreviations and Acronyms list, but it needs to be defined when first used in the chapter.	The text is revised to reflect the comment.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	263-418	Section 3.17.5.1, Page 3.17-20Third paragraph on Effects on social values and quality of life. EJ should be added to the Abbreviations and Acronyms list and defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-419	Section 3.17.5.1, Page 3.17-23First paragraph on Additional Mitigation – Socio-2. FOB should be added to the Abbreviations and Acronyms list and defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	263-420	Section 3.17.5.2, Page 3.17-30Last sentence in second paragraph. ISA is listed on the Abbreviations and Acronyms list, but it needs to be defined when first used in the chapter.	Text has been modified as requested.
TransWest Express LLC	264-1370	TransWest believes that the DEIS satisfies the twin purposes of the National Environmental Policy Act of 1969 ("NEP A"), to consider the potential impacts of a proposed federal action and to inform members of the public of those potential impacts. See Baltimore Gas & Electric v. Natural Resources Defense Council, 462 U.S. 87, 97 (1983).	Thank you for your comment.
TransWest Express LLC	264-1371	Section 2.8.1 of the DEIS lists the criteria and parameters used by the BLM to guide the selection of the agency preferred alternative. However, when the impacts of the alternatives on the identified parameters are compared, in many cases the impacts of the agency preferred alternative exceed those of the applicant proposed alternative, as discussed below. The reader is thus left to guess as to the rationale for the selection of the preferred alternative, as it is not at all clear that this alternative would best accomplish the purpose and need of the proposed action while fulfilling BLM's statutory mission and giving consideration to economic, environmental, technical and other factors such as the criteria and parameters described on p. 2-56 to 2-57.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. The Final EIS includes additional detail on the rationale for the lead agencies' choice for preferred alternative.
TransWest Express LLC	264-1372	Section 2.8.1 explains that trade-offs between criteria used to select the agency preferred alternative were necessary. Consequently, BLM established parameters to define priorities which were used to determine which alternatives best fulfill the criteria. Those parameters are reflected in Tables 2-23 through 2-27. However, no rationale is provided to explain how those parameters support the selection of the preferred alternative. The following examples are not exhaustive. The parameters are addressed in the order in which they appear in Tables 2-23 through 2-27. TransWest suggests that the FEIS remind readers that the summary tables in Chapter 2 (Tables 2-23 to 2-27) should be read in conjunction with the more detailed impacts analysis contained in Chapter 3.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Text was added to Section 2.8.1 of the Final EIS to encourage readers to review the detailed resource impact information contained in Chapter 3.
TransWest Express LLC	264-1373	The DEIS defines "greenfield" as "a piece of usually semi-rural property that is undeveloped except for agricultural use, especially one considered as a site for expanding urban development." Glossary at G-13. TransWest believes that this definition is not particularly relevant in the context of transmission line construction because the routes of the Project and the alternatives are not intended as sites for expanding urban development. The more relevant point is that a "greenfield," for purposes of transmission line location, is a route that is undeveloped for transmission infrastructure purposes. The West-wide Energy Corridor Final Programmatic Environmental Impact Statement ("WWECEIS") explained that the first step in identifying conceptual energy transport corridors included moving routes, where possible, "to take advantage of existing ROWs, following existing infrastructure in order to avoid placing corridors in "greenfield" (undeveloped) locations." WWECEIS at p. 2-26. Consistent with that use of the term "greenfield," Trans West recommends that the definition of the term in the Glossary for the FEIS be revised to: "a Reference Line Segment that is not co-located near or parallel to an existing transmission line or other linear utility infrastructure."	The glossary definition and use of the term "greenfield" in the Final EIS was clarified to indicate that greenfield is defined as an area that does not have current development from existing aboveground linear infrastructure.
TransWest Express LLC	264-1374	TransWest agrees with BLM's use of parameters l.a. and 5.f. as important factors in determining the preferred alternative. Keeping the Project in designated utility corridors and outside of greenfields (as defined above) accomplishes the objective of the Presidential Memorandum on Transforming our Nation's Electric Grid Through Improved Siting, Permitting, and Review (June 7, 2013, 78 Fed. Reg. 35,539, 35,540, June 12, 2013) to "minimize the proliferation of dispersed and duplicative rights-of-way crossing Federal lands." The applicant proposal for the Project includes 73% of reference line segments co-located with existing linear utility infrastructure, compared to only 51% of co-located segments in the agency preferred alternative. Consequently, the applicant's proposed action better achieves the goals of the President's Memorandum than does the agency preferred alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1375	It is also important that, to the extent that BLM may be considering applications for other transmission lines or other linear facilities in this area, those applications should be included in BLM's cumulative effects analysis for the Project. However, the proposed action under consideration in this EIS is the TransWest Project and BLM's decision-making on that proposal should be based on the impacts of that Project.	Thank you for your comment. The analysis in the Draft EIS does not consider any proposed transmission lines as connected to this project in any way. Chapter 5 of the Draft EIS has considered other reasonably foreseeable transmission line projects in the TransWest project area.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1376	Where existing designated utility corridors and other routes paralleling existing transmission facilities can be utilized for the Project, the clear national priority to use such designated corridors and avoid greenfields construction mandates serious consideration of those routes for the Project, particularly given that the Project is an RRTT project, unlike others that may be also under consideration by the BLM or cooperating agencies.	Existing energy corridors were considered in development of the Proposed Action and alternatives for the TWE project. Section 3.14 (Land Use) and the Land Use Summary of Impact tables in Chapter 2 of the Draft EIS disclose mileage within WWEC- and RMP-designated corridors by alternative. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1377	Trans West requests that the BLM review its choice of Preferred Alternative in light of the goals set in the President's Memorandum for Transforming our Nation's Electric Grid Through Improved Siting, Permitting, and Review (June 7, 2013). That Memorandum directs the Secretary of the Interior (and others) to "strongly encourage" the use of designated energy corridors on Federal land in the Western States, unless it can be demonstrated that a project cannot be constructed within a designated corridor due to resource constraints on Federal lands. As Trans West has point out above and elsewhere in these comments, in most cases the Applicant Proposal achieves the President's goals enunciated in the Memorandum far better than does the agency Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1378	Parameter 5.a. does not support the selection of Alternative 1-D as the Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1379	Parameter 5.b. is the number of raptor nests within one mile of the reference line for the applicable alternative. Once again, the Preferred Alternative (I-D) has approximately 50% more raptor nests within one mile than does alternative I-A (Applicant Proposal), as well as more acres of important Bird Areas crossed by the transmission line corridor. The reader must conclude that Parameter 5.b. was not considered in the selection of the Preferred Alternative in Region I.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1380	There is no explanation for how BLM weighed the two elements of parameter 3.a. to conclude that Alternative 1-D (Preferred Alternative) better accomplished the goals of parameter 3.a. than does Alternative 1-A (Applicant Proposal).	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. The Final EIS includes more detailed rationale on the lead agencies' choice for preferred alternative.
TransWest Express LLC	264-1381	It is also unclear whether "impacted greater sage-grouse habitat (acres)" shown in Table 2-23 (as well as in the tables for the other Regions) actually is the same as "amount of core habitat crossed," which is the metric for impacts on greater sage-grouse described as parameter 3.a. on p. 2-56 of the DEIS.	Executive Summary tables have been updated to clarify which habitat types are discussed.
TransWest Express LLC	264-1382	Because "core habitat" is a sage-grouse management concept that has been formally adopted only in Wyoming, parameter 3.a. should be clarified in the FEIS to describe exactly what kind(s) of sage-grouse habitat are reflected in Tables 2-23 to 2-27.	Executive summary tables have been updated to address comment.
TransWest Express LLC	264-1383	The Applicant Proposal better achieves the goals of parameter 3.b. (number of special status raptor nests within one mile) than does the Preferred Alternative (187 vs. 208).	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1384	No rationale is provided for why the agency Preferred Alternative better incorporates the objectives of parameter 5.c. than does the Applicant Proposal.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. The Final EIS includes detailed rationale regarding the choice of the lead agencies' preferred alternative.
TransWest Express LLC	264-1385	In summary, Table 2-23 provides absolutely no justification for the selection of the Preferred Alternative in Region I. In fact, a comparison of the parameters which BLM states at p. 2-56 were used to identify the Preferred Alternative indicates that Alternative I-A (Applicant Proposal) would have fewer impacts on those specified parameters overall. Moreover, this route has been endorsed by the county commissioners of Carbon and Sweetwater Counties, Wyoming and Moffat County, Colorado. The desires of the local governments, particularly in light of the impacts analysis favoring Alternative I-A (Applicant Proposal), should not be disregarded. TransWest requests that the BLM review the data in the DEIS and reconsider its preferred route in Wyoming.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.

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Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1387	The DEIS at p. 3.14-36 incorrectly states that the Tuttle Ranch conservation easement "prohibits overhead transmission lines." The Conservation Easement in Gross at issue was recorded on September 27, 2012 (Moffat County Reception No. 20124279) ("Tuttle Easement"). A copy of the Tuttle Easement is attached to this letter as Exhibit 6. The Tuttle Easement provides that "the following activities are prohibited and restricted, except as expressly allowed in this CE or in the Management Plan or where the State provides prior written approval." Tuttle Easement at p. 5, paragraph 4. The "following activities" referred to include "electrical transmission lines." Tuttle Easement at p. 7, paragraph 4.R. Therefore, while transmission lines are among those activities that are generally excluded, they may be allowed "where the State provides prior written approval." The FEIS should correct this inaccuracy in the DEIS.	Table 3.14-11 was updated to indicate that transmission lines may be allowed "where the State provides prior written approval", with a citation to Moffat County Reception No. 20124279. The resulting analysis language contained in 3.14-36 and elsewhere was also revised accordingly.
TransWest Express LLC	264-1388	Micro-siting Option 1 shown on Figure 2-25 in the DEIS should not be discarded simply because of the minor overlap with the Tuttle Easement. The 250-foot wide TWE Project right-of-way would use just 0.6%, or an estimated 91 acres, of the total Tuttle Ranch conservation easement area of over 15,000 acres. It is also significant that the Applicant Proposal would parallel two existing transmission lines in the area that lie south of U.S. Highway 40, in the corridor and on the Tuttle Ranch. As discussed above, following existing linear features, as opposed to creating new greenfields corridors, minimizes the transmission line's overall environmental footprint. Also, TransWest's revised separation criteria (discussed in Part 2 below) would allow the TWE Project to be located as close as 250 feet from the existing southernmost line on the Tuttle Ranch, the Bears Ears-Bonanza 345 kV transmission line, for the entire length of this 3-mile segment, thus further minimizing incremental environmental impacts.	Thank you for your comment. The Final EIS retains an analysis of the Tuttle Easement Micro-siting option 1, revised to reflect a 250' offset from the existing transmission line.
TransWest Express LLC	264-1389	Although the DEIS discusses Micro-siting Options 2 and 3 to avoid the Tuttle Easement, those options require crossing the Dinosaur National Monument's Deerlodge Road, administered by the National Park Service ("NPS"). The DEIS incorrectly states that "Tuttle Easement Micro-siting Option 2 would avoid the Tuttle Ranch Conservation Easement and pass between where the easement and the NPS Dinosaur National Monument's Deerlodge Road intersects with Highway 40." DEIS at p. 2-40. While this statement may be true of the actual footprint of the transmission line, it is not true of the 250-foot ROW needed for the safety and reliability of the line. The 250-foot wide ROW is anticipated to intersect small portions of both the NPS Dinosaur National Monument's Deerlodge Road and the Tuttle Ranch Conservation Easement under Micro-siting Option 2. TransWest requests that this inaccuracy in the DEIS be addressed in the FEIS as follows: The Tuttle Easement Micro-siting Option 2 would result in the 250-foot transmission ROW intersecting small portions of both the Tuttle Ranch Conservation Easement and the NPS Dinosaur National Monument's Deerlodge Road where it intersects with Highway 40, even though the actual transmission line footprint would avoid both areas. Therefore, written permission from the State of Colorado (Parks and Wildlife Commission) would be required with respect to the Tuttle Ranch Conservation Easement and the NPS would have to approve TransWest's ROW application filed with the NPS. As discussed with respect to the Lake Mead National Recreation Area, the NPS would have to find that the ROW is in the public interest, meets the "no impairment" standard under the NPS Organic Act, and that there is no "practicable alternative."	Section 3.15.3.2 discloses the "no impairment" standard of the Organic Act and that ROWs are issued generally only if there is no practicable alternative to such use of NPS lands. The analysis for Tuttle Easement Micro-siting Option 2 (contained in Section 3.15, Section 4.3, and Alternative I-D subsection of the Draft EIS) discusses these standards and indicates that there is a practicable alternative to this option. As a result of the impact analysis contained in the Draft EIS and public and agency comments, Tuttle Easement Micro-siting Option 2 was eliminated from detailed analysis in the FEIS.
TransWest Express LLC	264-1390	In an effort to avoid crossing the NPS Deerlodge Road and at the suggestion of the NPS, TransWest would like to propose an additional micro-siting option for the Tuttle Easement. Attached to this letter as Exhibit 1 and referred to as Micro-siting Option 4 is a plat showing a possible alternative route that crosses the NPS Deerlodge Road on State of Colorado lands. The NPS has an easement across the state lands from the State; crossing the Deerlodge Road on the state lands would not require NPS approval.	Analysis and disclosure of this micro-siting option was included in the Final EIS.
TransWest Express LLC	264-1391	Another possible micro-siting option is shown on the plat attached to this letter as Exhibit 2 and referred to as Tuttle Easement Micro-siting Option 5. This route would still require NPS approval to cross the Deerlodge Road but would avoid sage-grouse PPH. Micro-siting Option 4 avoids the Tuttle Easement but crosses the Cross Mountain Ranch proposed conservation easement. Micro-siting Option 5 would avoid both the Tuttle Easement as well as the proposed (but not finalized) conservation easement on the Cross Mountain Ranch lands adjacent to the Tuttle Easement.	The BLM has determined that this option will not be carried forward for further analyses due to the increased area of greenfield disturbance required and the crossing of the NPS Deerlodge Road.
TransWest Express LLC	264-1393	Applying the parameters described in Section 2.8.1 to Table 2-24 which summarizes the impacts for Region II, TransWest reaches a similar conclusion as it did in reviewing the impact summary for Region I; i.e., the impacts analysis does not support the identification of the Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.

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TransWest Express LLC	264-1394	Parameter 3.a. therefore does not provide a rationale for the selection of the Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1395	Clearly, impacts on visual resources do not explain the selection of Alternative II-F as the agency Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1396	Table 2-24 makes it somewhat confusing to compare the application of Parameter 1.a. (use of designated utility corridors) to the different alternatives because there are conflicting miles shown for Alternatives II-A (Applicant Proposal), II-B and II-C. For Alternative II-A (Applicant Proposal), the table shows, in one box, 39 miles in BLM RMP corridors and 56 miles in WWEC, while another box shows 26 miles in RMP corridors and 56 miles in WWEC. There are similar disparities in the descriptions of miles in corridors for Alternatives II-B and II-C. Alternatives II-D, II-E and II-F (Preferred Alternative) each show only one entry for miles in RMP and WWEC corridors.	The Summary of Impacts table for Region II in Chapter 2 of the Final EIS was revised to address this.
TransWest Express LLC	264-1397	Parameter 6.a. measures the impacts on private lands (with criterion No. 6 favoring minimal use of private lands). The DEIS does not address whether "private land" includes tribal and allotted Indian lands but, during the corridor screening process (see Appendix B at p. 3-2), avoidance of tribal lands was considered important. That goal was consistent with the WWEC PEIS objective to avoid tribal lands (WWEC PEIS at Table 2.2-7).	The Land Use impact parameter tables in Section 3.14 of the Draft EIS distinguish between "private land" and "BIA/tribal lands" and disclose miles/percent of alternative within BIA/tribal lands by region when at least one alternative would affect tribal lands (i.e., land jurisdiction entities are not included listed in tables when the alternatives within that region do not cross those lands).In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Avoidance of both private and tribal lands was emphasized where possible in light of other resource concerns. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in the Final EIS.
TransWest Express LLC	264-1398	Alternative II-F (Preferred Alternative) crosses tribal lands of the Uintah and Ouray Reservation. The Tribe has inherent sovereign power over the lands within its reservation. Tribal consent is required to obtain a right-of-way across tribal lands under 25 U.S.C. §324. Moreover, federal laws prohibits conveyances of Indian lands unless authorized by Congress, and there is no federal statute authorizing condemnation of rights-of-way across tribal lands (though there is authority to condemn allotted Indian lands, 25 U.S.C. §357). Given the uncertainties associated with obtaining a tight-of-way across tribal lands on commercially acceptable terms, it is irresponsible for the BLM to identify a route crossing tribal lands as its preferred alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in the Final EIS.
TransWest Express LLC	264-1399	In addition, the DEIS does not describe any review of tribal land use plans and so does not disclose any possible conflict between such plans and Alternative II-F (Preferred Alternative), as required by 40 C.F.R. §1502.16©.	At this time, there is no knowledge of any tribal land use plans associated with Alternative II-F. Government-to-government consultation among BLM, Western, and the Ute Tribe of the Uintah and Ouray Reservation currently is ongoing. If any tribal land use plans are identified by the Ute Tribe during the consultation process, such plans will be reviewed and incorporated.
TransWest Express LLC	264-1400	For parameter 5.e. (effects on LWCs and IRAs)The analysis does not explain how BLM weighted these varying impacts on IRAs and LWCs in identifying Alternative II-F as its Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additional rationale regarding how the criteria for choosing the Agency Preferred Alternative has been provided in Chapter 2 of the Final EIS.
TransWest Express LLC	264-1401	Parameters 4.a. and 4.b. purportedly measure impacts to public health and safety concerns. In connection with parameters 4.a. and 4.b., Table 2-24 states that noise impacts under Alternative II-A (Applicant Proposal) would be greater than those under Alternative II-F (Preferred Alternative), presumably because fewer residential structures are within 500 feet of the Alternative II-F reference line. However, the DEIS also notes that construction noise would be only temporary and any noise effects during operation would be negligible, DEIS at p. 3.18-10. Moreover, the analysis at p. 3.18-24 of the DEIS concludes that all Region II alternatives would have a relatively low impact on public health and safety, which is the criterion addressed by parameters 4a. And 4.b.	Although Region II alternatives would incur relatively low impacts, portions of Region II may experience relatively higher impacts than other portions of Region II, while still staying within the parameter of low impacts.
TransWest Express LLC	264-1402	The final parameter addressed in Table 2-24 is 2.a. (need for plan amendments).Obviously, that parameter does not militate in favor of selection of Alternative II-F as the Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in the Final EIS.

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TransWest Express LLC	264-1403	In summary, as was the case for Region I, the impacts analysis associated with the parameters developed by BLM to select its preferred alternative does not support the selection of Alternative II-F (Preferred Alternative). TransWest requests that the BLM review the data in the DEIS and reconsider its preferred route in Region II.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
TransWest Express LLC	264-1404	Although TransWest believes that Alternative II-F (Preferred Alternative) is a poor choice of routes through Region II, we have nonetheless identified two segments of the agency Preferred Alternative that require expansions to the width of the transmission line corridor to accommodate siting constraints identified in the DEIS. These areas include a heavily developed oil and gas field in eastern Utah and the Nine Mile Canyon area. The transmission line corridor expansion area shown on Exhibit 4 will allow more flexibility to site the right-of-way to avoid the existing oil and gas development in the area and also provide a more optimal location to cross the 345 kV Bonanza line.	The transmission line corridor expansion area shown on Exhibit 4 has been incorporated into the Final EIS analysis.
TransWest Express LLC	264-1405	This greenfield section of the Preferred Alternative (II-F) would require spanning very rugged terrain as the route traverses across and along the Nine Mile Canyon and the canyon valley. TransWest's suggested revision to the transmission line corridor in this area is shown on Exhibit 3 and is necessary to address these challenges and constraints.	The transmission line corridor revision shown on Exhibit 3 has been incorporated into the Final EIS analysis.
TransWest Express LLC	264-1406	On balance, it is not possible to determine how BLM weighed the various wildlife impacts in applying parameters 5.a. and 5.b. (in Region III)	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative has been provided in the Final EIS.
TransWest Express LLC	264-1407	There is no explanation for how the differing results for these parameters by alternative were weighted by BLM in identifying its Preferred Alternative. (3a, 3b, 3d, and 3e, in Region III)	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additional detail on how the criteria were weighed in determining the Agency Preferred Alternative is provided in Chapter 2 of the Final EIS.
TransWest Express LLC	264-1408	Parameter 6.a. to measure the impacts on private lands favors Alternative III-A (Applicant Proposal), not only because a lower percentage of the route would be located on private lands (14% vs. 17%) but, more importantly, because 5% of the Alternative III-B (Preferred Alternative) route is located on tribal lands. As discussed above under Region II, the feasibility of obtaining legal access across tribal lands is questionable.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additionally, at this point, there has been no indication from the Ute Tribe that crossing tribal lands is not possible.
TransWest Express LLC	264-1409	The DEIS does not address how impacts to IRAs and L WCs are to be weighted when an alternative affects IRAs but not L WCs and vice versa.(5e in Region III)	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additional information regarding how criteria were evaluated in choosing the Agency Preferred Alternative has been provided in the Final EIS.
TransWest Express LLC	264-1410	parameters 4.a. and 4.b. (number of residences within 500 feet and adjacent communities within the project corridor),do not provide justification for selecting Alternative III-B as the Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in the Final EIS.
TransWest Express LLC	264-1411	Just as was the case for Regions I and II, the impacts analysis disclosed in Table 2-25 for Region III does not disclose a clear reason for the selection of the Preferred Alternative, based on the parameters identified by BLM to guide its selection of the Preferred Alternative.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in the Final EIS.
TransWest Express LLC	264-1412	The DEIS at p. 4-44 to 4-45 provides that the existing 1,400 foot wide ROW corridor created in the RMP decision RW-1-a (subject to Congressional release of the Sunrise ISA) would need to be amended. However, because the separation criterion for the TWE Project has been reduced from 1,500 feet to 250 feet (see discussion in Part 2 below), if Congress acts to release the Sunrise ISA, the amendments to the RMP discussed at pages 4-44 to 4-45 of the DEIS expanding the 1,400-foot wide ROW corridor contained in the RMP are no longer necessary.	Due to the congressional release of the Sunrise ISA, a plan amendment is no longer needed to cross through this area. Chapter 4 of the Final EIS has been updated to reflect this change.

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TransWest Express LLC	264-1413	<p>Additionally, the cumulative impacts section of the DEIS states that there is currently "an approximately 300-foot-wide ROW available for a future transmission line across this Instant Study Area that was approved by Congress." DEIS at p. 5-49. Based on a 2005 Department of the Interior Solicitor's Opinion ("Opinion") that TransWest obtained under the Freedom of Information Act, this statement is incorrect. See Exhibit 7, 2005-04-20, Solicitor's Opinion Sunrise ISA Corridor. The Opinion examined the Clark County Conservation of Public Land and Natural Resources Act of 2002 passed by Congress which released an existing 500-foot wide right-of-way corridor in the Sunrise ISA and analyzed whether Kern River Gas Transmission Company could build another natural gas transmission line in the 500' corridor. The Opinion recognized that the Final RMP/EIS, October 1988, proposed a 1,400-foot corridor through the Sunrise ISA, but that Congress, in the Clark County Act, only released a 500-foot corridor. Exhibit 7, Opinion at p. 2-3. The Opinion concluded that the release of the 500-foot corridor was not a general release but only a release for a specific project and, therefore, another transmission line could not be built in the 500-foot ROW corridor. The Opinion provides that: Section 207(c) of the Clark County Act is a solitary release of a limited corridor (500 feet) to a specific party (State-regulated sponsor of the Centennial Project) to construct a specific project (two 500-kilovolt electrical transmission lines). Had Congress intended to release the Sunrise Mountain ISA from its present wilderness status, it could easily have included the site among the sites specifically enumerated in Section 207(a) of the Clark County Act, which are released from wilderness determination in accordance with Section 207(b). It is my opinion, to read this legislation as a general release, as Kern River suggests, is contrary to the specific language of the statute." Exhibit 7, Opinion at p. 3. Therefore, as of now, the physically available 300 feet of the 500 foot ROW released in the Clark County Act cannot be utilized. Further, incorrectly assuming a ROW of 300 feet, the DEIS at p. 5-49 references several proponents (not projects) as "reasonably foreseeable including, Great Basin/NV Energy, Silver State Energy Associates, TransWest, and possibly ATC/Duke." The DEIS cautions that "[b]ecause both AC and DC transmission lines propose to cross the ISA, a major challenge will be to address the needs of both types of projects within the remaining corridor width across the ISA (Figure 5-8-Area 4D-1)." If, however, Congress acts to release the Sunrise ISA, then the 1,400 foot corridor will be activated for use as stated in the Las Vegas Field Office RMP. This will expand the existing corridor by approximately 565 feet while also preserving the 300-foot corridor for the 500 kV AC Centennial Project. Subject to Congressional approval, this potential expansion needs to be taken into consideration in the cumulative impacts analysis. Based on WECC's separation criteria of 250 feet, which the TWE Project is utilizing, expansion of the corridor by 565 feet can accommodate new transmission lines.</p>	<p>The referenced text on page 5-49 of the Draft EIS was revised to indicate that the 300 foot-wide ROW is physically available but cannot be utilized. The 2014 Consolidated Appropriations Act (2014 Act) H.R. 3547-309, Sec. 115 (a) released the Sunrise Mountain Instant Study Area (ISA) from further wilderness consideration and study and the area is to be managed in accordance with the adopted land management plan. Per a January 2014 BLM memo, the use of the 500 foot-wide corridor containing the NV Energy's Centennial Project right-of-way is unclear. Under Post Release Land Use Approvals, it could be interpreted that discretion is given to BLM to be able to accommodate multiple applicants within a single right-of-way. The 2014 Act is silent on existing or new rights-of-way or corridors. Therefore, the 200 foot-wide right-of-way issued to NV Energy that is within the 500-foot corridor designated in the 2002 Act could have multiple applicants, the remaining 300 feet of the corridor could be available for applicants, and the release of the ISA makes the constraints of the 2002 Act moot. A stricter interpretation may indicate that the 500 foot-wide corridor is still intact for the purposes identified in the 2002 Act.</p>

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TransWest Express LLC	264-1414	<p>Finally, the DEIS provides that a "Project alternative has been proposed that would be located at the ISA/National Recreation Boundary to avoid this constraint." This alternative, however, requires either Congressional approval to release the Sunrise ISA (as described above) or the approval of the National Park Service, which creates additional issues described below.</p> <p>Failing to release the Sunrise Mountain ISA from "Wilderness Study Area" status would mean the TWE Project would have to be routed through the Lake Mead National Recreation Area (Mead NRA), which is administered by the National Park Service (NPS). The Mead NRA was formed on October 8, 1964 when President Lyndon Johnson signed the act that formally established the "Lake Mead National Recreation Area."</p> <p>The NPS may issue a ROW for the TWE Project, but only if three conditions are satisfied. First, the NPS must find that the right of way is "not incompatible with the public interest." 16 U.S.C. §§ 5, 79. Second, NPS guidance emphasizes that any special use within the National Park System, including ROWs, must meet the no-impairment standard from the NPS Organic Act which directs the NPS to regulate the use of national parks (including national recreation areas) "by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and rustic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." 16 USC § 1. Finally, the NPS has issued guidance that is specific to its approval of ROWs. ROWs allowing a utility to pass over, under, or through NPS property generally may only be issued if there is "no practicable alternative" to the use of NPS lands. NPS Management Policies § 8.6.4.1; Director's Order #53 § 1 0.2. Trans West requests that the FEIS include discussion of these legal constraints on NPS authority to grant ROWs.</p> <p>TransWest has an application pending with the NPS for an alternative route through the Mead NRA. If, however, the Sunrise ISA is released from consideration as wilderness and the Preferred Alternative/ Applicant Proposal (Alternative IV -A) becomes legally permissible, the alternative routes through the Mead NRA will not meet the requirement that there is "no practicable alternative."</p>	<p>Section 3.15.4.6 of the Draft EIS does acknowledge that the NPS has indicated that constructing the project would be incompatible with Lake Mead NRA management. An additional subsection was added to Section 3.15.3 of the Final EIS to identify management stipulations from the Lake Mead NRA General Management Plan and the "no impairment" and "no practicable alternative" standard of the Organic Act and NPS Director's Order #53. The Final EIS analysis was updated appropriately to reflect this language. Section 3.15 of the Final EIS was also updated to indicate that the 2014 Consolidated Appropriations Act (2014 Act) H.R. 3547-309, Sec. 115 (a) released the Sunrise Mountain Instant Study Area (ISA) from further wilderness consideration and study and that the area is to be managed in accordance with the adopted land management plan.</p>
TransWest Express LLC	264-1415	<p>It is not always clear from Tables 2-23 through 2-27 whether a particular impact relates only to construction (and thus is temporary) or to operation of the Project (e.g., fugitive dust emissions, special status plants). Temporary impacts should be distinguished from impacts that may exist throughout the life of the Project.</p>	<p>The stage of the Project to which the impacts pertain were added to the Summary of Impact tables in Chapter 2 of the Final EIS.</p>
TransWest Express LLC	264-1416	<p>Overall, the information in Section 2.8.1 demonstrates that the Applicant Proposal alternative actually minimizes the impacts as compared to the agency Preferred Alternative. The Applicant Proposal minimizes the impacts in all the following categories as compared to the BLM's Preferred Alternative: utilizing existing utility corridors; minimizing the number of land use plans that need to be amended to comply with the proposed action; minimizes the impacts to active leks within four miles of the transmission line; minimizes the number of nests within one mile of the transmission line; minimizes the amount of Canadian lynx habitat crossed; minimizes the acres of designated critical habitat for the desert tortoise; minimizes the number of adjacent communities within the Project corridor; and minimizes impacts to lands with wilderness characteristics. Given these conclusions, the BLM should reconsider the data contained in the DEIS and its choice of the Preferred Alternative as compared to the Applicant Proposal.</p>	<p>In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additional information regarding how criteria were evaluated in choosing the Agency Preferred Alternative has been provided in the Final EIS</p>

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TransWest Express LLC	264-1417	<p>1. Revision to 15 00' Separation Criterion</p> <p>At the time the Project was developed and the DEIS was prepared, TransWest believed that, to meet North American Electricity Reliability Corporation ("NERC") and Western Electricity Coordinating Council ("WECC") reliability standards, there would have to be a minimum of 1500' of separation between the TransWest Project transmission line and any parallel transmission line rated at 345 kV and higher. See DEIS, p. 2-7 and Appendix D at p. 5-9. Upon further analysis and review, however, Trans West, with the joint approval of Western, has revised the separation criteria outlined in Section 2.1 of the DEIS. The revised criteria reduce the required separation between the Project transmission line and any adjacent line from 1,500' (in some cases) to 250' from centerline to centerline. The change in this criteria should be reflected in the FEIS by substituting the following for the last four sentences in the first paragraph on p. 2-7 of the DEIS: TransWest has developed minimum line separation requirements based on the "tower height" dimensions adopted by WECC in 2012. This tower height dimension takes into consideration both the height and width of typical transmission line structures and is meant to prevent a tower failure of one line from impacting the adjacent line. Application of the NERC and WECC reliability standards and preliminary transmission system contingency analyses indicate that the proposed Project transmission line centerline should be optimally no closer than 250 feet from parallel transmission line centerlines rated 230 kV and above.</p>	Section 2.2 of the Final EIS was revised to include details regarding the WECC "tower height" dimensions and how they have changed TWE's separation criteria.
TransWest Express LLC	264-1418	The access road disturbance calculations provided by TransWest for use in the DEIS were based on previous 1,500' separation distance criteria. TransWest is in the process of developing engineered alignments for the Project utilizing the 250' separation distance and calculating the disturbance acreage due to the access road network. Based on preliminary calculations, the access road acreages of disturbance for segments of the line will be reduced between 5% and 20% for the segments co-located with existing transmission lines.	The Final EIS utilizes the adjusted disturbance numbers associated with the reduced separation distance for analyses purposes and impact disclosure.
TransWest Express LLC	264-1419	Although the definition of "transmission line corridors" in the Glossary (p. G-29) makes it clear that, while the corridors are generally two miles wide, in some areas the corridors are more or less than two miles wide, due to specific routing constraints. However, the DEIS makes frequent references to the "2-mile transmission line corridor" (e.g., p. 2-15). TransWest recommends that the FEIS eliminate the use of the term "2-mile transmission line corridor" or include an appropriate definition of the term.	The FEIS relies upon refined transmission corridors for the disturbance within the ROW, and on refined 2-mile (DEIS) corridors for disturbance outside the ROW. These are referred to as "refined transmission corridors" and "areas of disturbance outside the ROW," respectively, and the terms and definitions in the glossary have been updated accordingly.
TransWest Express LLC	264-1420	In addition, TransWest requests that the FEIS clarify that only the 250 foot wide right-of-way within that corridor will actually be disturbed, so that impacts on some resources have been overstated in the DEIS. For example, the Summary of Impacts tables in Chapter 2 show the number of acres in described recreation areas within both the 250 foot right-of-way area and within the "2-mile Corridor." Because only the right-of-way area will actually be disturbed, the other figures are not relevant to the impacts analysis and that fact should be clarified in the FEIS.	Additional clarifications were made in the Final EIS to disclose potential impacts for the transmission line vs. potential access roads.
TransWest Express LLC	264-1421	Based on agency comments on the potential Northern Terminal Ground Electrode Facility siting locations and the potential for conflicts with other public lands users, TransWest has identified the Bolten Ranch Ground Electrode System Site alternative as its Applicant Proposal replacing the Separation Flat Ground Electrode System Site proposal. (For clarity, TransWest is not withdrawing the Separation Flat site, but only replacing it with the Bolten Ranch site as the Applicant Proposal.) The Bolten Ranch Ground Electrode System Site alternative is suitable for use with all route alternatives. The addition of the Bolten Ranch Ground Electrode System Site alternative will require a revision to Figure 2-21 in the DEIS. Attached to this letter as Exhibit 5 is a revised PTDR Map Exhibit 5, Northern Terminal and Ground Electrode System-Proposed and Alternative Sites and Siting Area, that depicts the location of the Bolten Ranch site. TransWest requests that the FEIS substitute this map for Figure 2-21 and that the text reflect the Bolten Ranch site as the Applicant Proposal.	The Bolten Ranch Ground Electrode Site was added to the Applicant Proposed Action in the Final EIS.

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TransWest Express LLC	264-1422	Part I of TransWest's comments above explain why we believe the criteria and parameters described in Section 2.8.1 do not provide the rationale for selection of the Preferred Alternative. In addition, TransWest believes that parameters 4.a. and 4.b. are not proper standards to assess public health and safety concerns. Those parameters are the number of residences within 500 feet of the applicable reference line and the "adjacent communities within project corridor." DEIS at p. 2-56. While those parameters may be indicators of land use, they do not provide a basis for comparing public health and safety impacts of the various alternatives. Mere proximity of a residence or community to the Project does not mean there is a public health or safety concern, as explained in the analysis in Section 3.18.4 discussing the lack of data to support assertions of health risks from electromagnetic fields and coronas. More importantly, the conclusions in Section 3.18.7 state that all alternatives in all regions would have a relatively low impact on public health and safety. Therefore, TransWest believes that it is more accurate to characterize criterion No. 4 ("avoids or minimizes proximity to private residences and residential areas, thereby addressing concerns with public health and safety, aesthetics, visual effects and others") as being related to land use and visual concerns, rather than public health and safety concerns.	The use of the parameter of houses within 500 feet of the reference line is to provide some a relative comparison of risk between alternatives. The use of this parameter allows the quantitative comparison between alternatives while still allowing for the detailed qualitative discussion you reference in Section 3.18.4, which establishes the context of the potential risk.
TransWest Express LLC	264-1423	There is some confusion in the DEIS surrounding the use of the terms "avoidance" and "exclusion." Neither term appears in the Glossary, although "exclusion criteria" are defined as locations with the highest level of sensitivity, such as areas with protective regulatory or legislative designations, or extreme physical constraints not compatible with transmission line construction or operation. That definition was used by Trans West, BLM and Western to conduct the preliminary corridor screening analysis described in Appendix B to the DEIS. The screening analysis also used "avoidance criteria," which included sensitive areas that would potentially affect human populations, current land uses, or biological or culturally sensitive areas. App. B. at 3-1. Table 3-1 in Appendix B shows the avoidance and exclusion criteria used during the corridor screening process. However, those avoidance and exclusion criteria are to be distinguished from ROW avoidance areas and exclusion areas identified in the BLM resource management plans (RMPs). An example of the confusion that can be caused by imprecise use of these terms appears at p. 2-36 of the DEIS where it states that alignment changes within the transmission corridor must comply with all "avoidance, minimization, and mitigation requirements described in this EIS, pertinent BLM RMPs, and USFS LRMPs." The "avoidance criteria" used in the corridor screening process are described in the DEIS but it is not clear whether those are "avoidance requirements" with which alignment changes must comply. TransWest believes it would be helpful to the reader if avoidance and exclusion areas were defined in the FEIS and care taken to use the defined terms properly throughout the analysis.	The Final EIS was revised to refer to areas designated as avoidance or exclusion from ROWs in agency land-management plans as "designated avoidance/exclusion areas" to distinguish them from the previously considered avoidance criteria. The term "avoidance" was used in the Final EIS when referring to agency stipulations and mitigation measures. "Designated avoidance areas," "designated exclusion areas," and "avoidance" will be defined in the glossary of the Final EIS.
TransWest Express LLC	264-1424	Also, it would be useful to include a table in Chapter 4 that the reader could use in connection with Figures 4-1 through 4-19 to identify the resource addressed by the various avoidance and exclusion areas shown on those maps.	Details regarding avoidance/exclusion areas can be found in Section 3.14 Land Use, which are sometimes special designations and other times stipulations associated with a resource. The pertinent avoidance and exclusion areas affected by the proposed Plan Amendments are discussed in Section 4.4. Due to the complexity of the information presented and their relevancy to the proposed amendment, only pertinent information is discussed and presented in Chapter 4. The section has been reviewed and updated in the Final EIS to better clarify and convey the pertinent information for this Chapter.
TransWest Express LLC	264-1425	To determine the location and spatial extent of potentially suitable habitat for federally listed plant species within the transmission line corridors, BLM relied upon a habitat assessment conducted using ArcGIS and best available GIS datasets based on species-specific habitat characteristics (see DEIS p. 3.6-24 and elsewhere). Based upon the descriptions provided in Section 3.6, it appears that for each sensitive plant the BLM developed its own model for analysis of potential occurrence and impacts. Using best available data and models for impacts analysis is appropriate for the DEIS. The BLM should, however, provide details of how the models were developed and include that information in the FEIS so that the reader may evaluate the validity of the models.	The models used in the EIS have been approved by the appropriate management agency, or have been provided by the management agencies. The majority of the federally listed species were provided by the management agencies. Detail on model parameters used was provided in the Draft Survey Plan.
TransWest Express LLC	264-1426	In addition, rather than developing its own models, the BLM should consider use of existing models developed and approved by the U.S. Fish and Wildlife Service (FWS). For instance, Dr. Shannon Albeke has developed Species Distribution Models (SDMs) for the FWS and the BLM to predict suitable habitat based on species occurrence data along with environmental data for five federally threatened and endangered plant species in the Uintah Basin (<i>Lepidium barnebyanum</i> , <i>Schoenocrambe argillacea</i> , <i>Sclerocactus brevispinus</i> , <i>Schoenocrambe stiftutescens</i> and <i>Sclerocactus wetlandicus</i>). Use of Dr. Albeke's probabilistic model represents best available information for analyzing impacts to these Uintah Basin endemic species and should be used by the BLM.	The models used in the EIS have been approved by the appropriate management agency, or have been provided by the management agencies. The majority of the federally listed species were provided by the management agencies. For models developed specifically for the EIS, parameters were determined based on species habitat characteristics, and parameters and model results were approved by the management agencies. Dr. Shannon Albeke's Species Distribution Models have been incorporated by the BLM into the Vernal species models provided by the agencies and used in the EIS.

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TransWest Express LLC	264-1427	The DEIS relies upon modeled acreages of special status plant species occurring within the transmission line corridors to assess potential impacts (see, for instance, Table 3.6-9, p. 3.6-28). As stated elsewhere in this letter, use of the 2-mile transmission line corridor is inappropriate as the transmission line only has the potential to cause direct, long term impacts to plants occurring within the 250 foot right-of-way or within areas disturbed by access roads outside the right-of-way. Therefore, the DEIS overstates the potential impacts that may result from development of the TWE Project. A specific example of this occurs in the Region I analysis. Table 3.6-8 states that the Applicant Proposal (Alternative I-A) could impact 862 acres of Ute ladies'-tresses Orchid (UTLO) potential habitat and the Preferred Alternative (Alternative I-D) could impact 1,876 acres of UTLO potential habitat. However, as stated in the DEIS, there are no known occurrences of UTLO within the 2-mile transmission line corridors (DEIS p. 3.6-25). In fact, according to the Rawlins Resource Management Plan (BLM 2008) there are no known occurrences of UTLO within the Rawlins Field Office. Such extreme contradictions call into question the validity of the UTLO model used for the DEIS and upon which the impacts analysis is based. The BLM should confirm that each of the models used for occurrence and impact analysis represents best available scientific information. The BLM should base the impacts analysis in the FEIS on a representative reference line and not the 2-mile transmission line corridor, and all tables should be updated to reflect this revised analysis.	For the FEIS, the impacts to special status plants have been calculated using consistent methodology as the other biological resources as requested. The models used in the EIS have been approved by the appropriate management agency, or have been provided by the management agencies. The majority of the federally listed species were provided by the management agencies. For models developed specifically for the EIS, parameters, and model results were determined based on species habitat characteristics, and approved by the management agencies. The ULTO model in Wyoming was included based on direction from the USFWS Service Wyoming Field Office. The ULTO model has been reviewed by local botanists at both the BLM and USFWS.
TransWest Express LLC	264-1428	The agencies should more clearly explain in Section 3.15.3.9 that the 2001 Roadless Area Conservation Rule (Roadless Rule) does not prohibit the installation of transmission lines or the travel ways necessary for the installation and construction of transmission lines within inventoried roadless areas (IRAs). Although the document acknowledges that the Roadless Rule does not prohibit special use developments, the public may be incorrectly left with the impression that the Roadless Rule prohibits the Project. DEIS, p. 3.15-29. The Roadless Rule only prohibits the construction or reconstruction of roads within inventoried roadless area of the National Forest System. The applicable language of the Roadless Rule states that a "road may not be constructed or reconstructed in inventoried roadless area of the National Forest System except as provided in paragraph (b) of this section." 36 C.P.R. 294.12(a). (Citations are to the 2001 Roadless Rule which remains applicable as the result of litigation over the rule which occurred over many years, even though the 2001 Roadless Rule is not printed in the current codification of Title 36 of the Code of Federal Regulations.) A road is defined as a "motor vehicle travel way over 50 inches wide, unless designated and managed as a trail." 36 C.P.R. 294.11. The right-of-way for the transmission line is clearly not a travel way for motor vehicles. The term "road construction" is defined by the Roadless Rule as an "[a]ctivity that results in the addition of forest classified or temporary road miles." 36 C.P.R. § 294.11. Road reconstruction is similarly defined as an activity "that results in improvement or realignment of an existing or classified road." <i>Id.</i> The installation of the Project will not result in the addition of any permanent or temporary road miles within inventoried roadless areas. The plain language of the Roadless Rule does not prohibit the construction of the Project; no roads or road miles will be constructed within any inventoried roadless area. See also <i>Wilderness Workshop v. United States Bureau of Land Mgmt.</i> , 531 F.3d 1220, 1227-28 (10th Cir. 2008); <i>Hammond v. Norton</i> , 370 F.Supp.2d 226, 262 (D.D.C. 2005).	Section 3.15.3.9 of the Final EIS was modified to clarify that the Roadless Rule does not prohibit special use developments, such as transmission lines, or multiple use activities on these lands. It was also clarified that the Final Rule acknowledges that although other activities may also compromise roadless area values, they are best reviewed through local land management planning, and that the Rule focuses on road construction, reconstruction, and timber harvest in inventoried roadless areas because "they have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values" (USFS 2001). The Final EIS revisions to this section further clarify that the timber cutting that would be associated with this Project would be allowed under the Rule .

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TransWest Express LLC	264-1429	<p>Second, the prohibition on cutting timber within inventoried roadless areas included within the Roadless Rule does not apply where the "cutting, sale, and removal of timber is incidental to the implementation of a management activity not otherwise prohibited" by the 2001 Roadless Rule. 36 C.P.R. § 294.13(b)(2) "Examples of these activities include, but are not limited to . . . other authorized activities such as ski runs and utility corridors; or for road construction and reconstruction where allowed by this rule." 66 Fed. Reg. at 3258. Because the construction of the Project is not otherwise prohibited by the 2001 Roadless Rule, and because the Forest Service has the authority to approve special use permits within inventoried roadless areas, the Road less Rule does not prohibit the approval of the Project. The administrative materials accompanying the Roadless Rule confirm this interpretation of the 2001 Roadless Rule. The Forest Service did not intend to prohibit the construction of transmission lines in IRAs. Other activities identified by the public, such as motorized vehicle use, grazing, mining, and developed recreation facilities, were determined by the Agency to either not pose the same level of national risk for adversely impacting inventoried roadless areas, as do road construction, reconstruction, and timber harvesting, or the impacts are not as widespread. This same holds true for utility corridors, power lines, pipelines, water developments, and other special uses. Roadless Rule FEIS, p. 1-16. The Roadless Rule DEIS contains similar language and expressly states that the Forest Service was not attempting to address other special uses on the national scale. Another reason for not addressing these activities through national prohibitions is that they are not either directly permitted by the agency or their use is dispersed and cannot be effectively analyzed at the national level. ... This same situation holds true for utility corridors, power lines, and pipelines, developed recreation facilities, water development activities, and other special uses. Roadless Rule DEIS, p. 1-11 (emphasis added). Second, when describing activities potentially impacted by the Roadless Rule, the Forest Service expressly excluded transmission lines, utility corridors and other similar uses. In the Roadless Rule FEIS, the Forest Service indicated that common non-recreational special uses of National Forest Service lands include "communication sites, utility corridors (oil/gas pipelines, fiber optic, telephone lines, and power lines), linear irrigation facilities (pipelines, ditches, canals), and public and private roads." Roadless Rule FEIS, p. 3-249-3-250 (parentheticals in original). The Roadless Rule FEIS notes that while a majority of such uses require roads, "a small percentage of these types of uses can exist without road access and do occur within inventoried roadless and unroaded areas." Id. at 3-250. The rulemaking language explaining the prohibitions imposed by the 2001 Roadless Rule noted that timber cutting, sale, and removal will be allowed in inventoried roadless areas when incidental to implementation of a management activity not otherwise prohibited by the Roadless Rule. 66 Fed. Reg. 3244, 3258. "Examples of these activities include, but are not limited to ... other authorized activities such as ski runs and utility corridors " Id. (emphasis added).</p>	<p>Section 3.15.3.9 of the Final EIS was modified to clarify that the Roadless Rule does not prohibit special use developments, such as transmission lines, or multiple use activities on these lands . It was also clarified that the Final Rule acknowledges that although other activities may also compromise roadless area values, they are best reviewed through local land management planning, and that the Rule focuses on road construction, reconstruction, and timber harvest in inventoried roadless areas because "they have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area values" (USFS 2001). The Final EIS revisions to this section further clarify that the timber cutting that would be associated with this Project would be allowed under the Rule .</p>
TransWest Express LLC	264-1430	<p>The BLM has also significantly overstated the impacts the Project would have upon IRAs in Table 2-27. By suggesting the transmission line will impact an area two miles wide, the BLM states the Applicant Proposal will impact 29,502 acres of IRAs, while the Preferred Alternative will only impact 11,775 acres of IRAs. It would be far more accurate and informative to the public to include in Table 2-27 the information contained in Table 3.15-8 indicating the miles and acres within the 250-foot wide corridor. Table 3.15-8 indicates that Alternative II-A (Applicant Proposal) only impacts a total of four miles and 109 acres of IRA, far less than the 29,502 acres indicated in Table 2-27. When compared using this methodology, the ELM's own analysis demonstrates the impacts of Alternative II-F (Preferred Alternative) and Alternative II-A A (Applicant Proposal) are nearly identical; the agency Preferred Alternative impacts three miles of IRA and approximately 83 acres in Region II. In Region III, the BLM has again overstated the impacts to IRAs by including the full two-mile corridor in Table 2-27. Alternative III-A (Applicant Proposal) only impacts four miles and 124 acres of IRAs. By including the full two-mile corridor, the BLM incorrectly inflates the impacts to over 15,000 acres. Finally, the FEIS should reflect the construction methods (including helicopter access) which TransWest has proposed using in IRAs. DEIS, App. D at p. 71-72. Those methods will further mitigate any adverse impacts on IRAs crossed by the ROW.</p>	<p>Table 2-27 in the Draft EIS does disclose acres of 250' ROW, but also discloses acres of 2 mile corridor as a way of discussing areas where noise or visual impacts could affect wilderness characteristics of the IRA. The summary of impacts table was revised to better differentiate between direct and indirect impacts. Roadless construction methods (including helicopter access) are discussed extensively in the analysis contained in Section 3.15.4.4 and Section 3.15.4.5 of the Draft EIS, including the fact that the ROW would be reduced from 250' to 100' in IRAs and that roads would not be constructed in these areas. This reduced surface disturbance was disclosed in Table 3.15-8, Table 3.15-17 and Table 2-27 of the Final EIS. It should be noted, however, that roadless construction techniques will not mitigate all impacts to IRAs. Indirect impacts (such as construction noise and visual impacts, and operation visual impacts) are disclosed in Section 3.15.4.4 and Section 3.15.4.5 of the Draft EIS. Table 2-27 of the Final EIS was updated to better describe and disclose these impacts.</p>

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TransWest Express LLC	264-1431	TransWest encourages the BLM to take a closer look at Alternative I-A, the Applicant Proposal, as it is the shortest route in the Wyoming portion of Region I and contains the second lowest amount of access road miles necessary for the Project. Alternative 1-A (Applicant Proposal) also has the fewest acres of facility construction disturbance and reduces the amount of vegetation clearing necessary for the construction of the right-of-way. Trans West DEIS, Table 2.5.1.1, p. 2-38-2-39. Alternative I-A (Applicant Proposal) also has the second fewest number of acres of disturbance, and its route generally follows the Carbon-Sweetwater County line in Wyoming, a route specifically preferred by the Wyoming Governor's Office, Carbon County, Sweetwater County, and Moffat County, Colorado. Given the express preference of the Governor of Wyoming, as well as the counties impacted, BLM should carefully consider the Applicant Proposal rather than the currently identified Preferred Alternative in Region I. DEIS, p. 2-38-2-39.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additional information regarding how criteria were evaluated in choosing the Agency Preferred Alternative has been provided in the Final EIS.
TransWest Express LLC	264-1434	The BLM's Preferred Alternative would have greater impact upon vegetation resources in Region I than the Applicant Proposal (Alternative I-A). DEIS p. 3.5-48. Contrary to the BLM's suggestion in the conclusion of Section 3.5.6.3, Alternatives I-A (Applicant Proposal) and I-D (Preferred Alternative) would not have similar impacts. Alternative 1-D (Preferred Alternative) would impact over 200 additional acres of sagebrush shrubland during construction, which is important to special status plants and animals and can be difficult to successfully revegetate. This increase should be acknowledged as it could result in additional impacts to sagebrush communities and sagebrush obligate species, including the greater sage-grouse. Under current BLM policy, the BLM is required to minimize impacts to sage-grouse whenever possible. BLM Instruction Memorandum 2012-044 (12/27/2011).	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. BLM's Preferred Alternative in the Final EIS was reviewed and adjustments were made where necessary to address concerns raised in public comments.
TransWest Express LLC	264-1437	With respect to U.S. Forest Service Management Indicator Species in Region II, the contrast between the agency Preferred Alternative and the Applicant Proposal is even more stark. For every one of the parameters identified in Table 3.7-30, the Applicant Proposal (Alternative II-A) would have the same as or fewer impacts than the agency Preferred Alternative. In addition, Alternative II-F (Preferred Alternative) would affect habitat of the threatened Mexican Spotted Owl, unlike Alternative II-A (Applicant Proposal), DEIS p. 3.8-112 to 113. The BLM cannot justify the selection of the agency Preferred Alternative given the potential impacts to wildlife species.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Please note that more detailed descriptions of how competing resource uses were weighed in determining the agency preferred alternative have been provided in the Final EIS
TransWest Express LLC	264-1441	Similarly, with respect to Region II, the BLM admits that Alternative II-F (Preferred Alternative) would have more significant impacts on sage-grouse than would Alternative II-A (Applicant Proposal). DEIS, p. 3.8-112. It thus appears the BLM has selected a preferred alternative that maximizes potential impacts to known populations of sage-grouse. In addition, to the extent transmission lines impact sage-grouse populations, siting the TWE Project transmission line 250 feet from the existing Bonanza 345 kV transmission line in the WECC corridor as in the Applicant Proposal avoids and minimizes potential impacts to sage-grouse as any transmission line related impacts have already occurred. Siting next to an existing transmission line also reduces fragmentation of the landscape which has been identified by the FWS as a potential listing factor. The BLM must clearly describe the justification for selecting Alternative II-F (Preferred Alternative) given the greater impacts predicted to the greater sage-grouse.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additional information regarding how criteria were evaluated in choosing the Agency Preferred Alternative has been provided in the Final EIS.
TransWest Express LLC	264-1442	The DEIS erroneously states (p. 3.8-59) that TransWest has developed a framework for impact analysis that is focused on the listing factors considered by the FWS for evaluating future listing and protection of the greater sage-grouse under the Endangered Species Act. In fact, this framework was developed by the BLM, in concert with FWS, in connection with the Gateway West Transmission Line Project. A copy of the Framework is attached to this letter as Exhibit 8. The Framework developed for the Gateway West project was refined for use with the TWE Project and includes mitigation, which is addressed after the analysis of the impacts of the Project on sage-grouse has been completed. The Framework calls for the use of Habitat Equivalency Analysis ("HEA") as the basis for determining appropriate mitigation for Project impacts on sage-grouse. See DEIS at p. 3.8-60 to 61 and Sage-Grouse Mitigation Plan at p. 3-10, Appendices A, B and C. The HEA is a scientific, peer-reviewed metric for ensuring that mitigation for impacts to sage-grouse actually compensates for the habitat services required by the sage-grouse and disturbed by the Project. TransWest's commitment to implement the Sage-Grouse Mitigation Plan for the alternative approved by the BLM will ensure that impacts to greater sage-grouse are mitigated using a site-specific scientific method for identifying and quantifying the mitigation, rather than a method based on either a guess as to what kinds and amounts of mitigation would be effective or an arbitrary ratio of habitat acres restored to habitat acres disturbed.	Thank you for your comment. The text of the FEIS has been refined in Section 3.8.6.4 (DEIS page 3.8-59) to better reflect the history of the Framework for Sage-Grouse Impacts Analysis for the TransWest Express Transmission Project developed by the BLM and USFWS in January 2012.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1443	TransWest encourages the agencies to modify Mitigation Measure SSWS-5 in order to ensure that the mitigation measure is practicable. First, the agencies need to clarify the language defining "high quality sage-grouse habitat," DEIS, p. 3.8-37. The current language states that such habitat may include all lands within four miles of a lek, and all core and PPH areas regardless of habitat suitability. In addition, the language is imprecise because it suggests other types of important habitat may be defined on an ad hoc basis by the agency. That uncertainty makes compliance by TransWest difficult, if not impossible. TransWest therefore requests that the mitigation measure be clarified in the FEIS so that the exact areas subject to Mitigation Measure SSWS-5 are precisely defined and those areas should be clearly defined areas of high quality habitat, not just any habitat that might be used by sage-grouse from time to time. Finally, this mitigation measure should be revised to refer to sage-grouse, rather than black-footed ferret, in the opening clause.	SSWS-5 has been revised to clarify the habitat types that it will apply to. Reference to the black footed ferret has been removed.
TransWest Express LLC	264-1444	More importantly, though, TransWest objects to the requirement that the transmission towers include anti-perching devices, particularly where the Project parallels existing transmission facilities using lattice structures that lack anti-perching devices. There are no peer-reviewed, scientific studies showing that powerlines increase avian predation on sage-grouse and, if so, whether such predation is significant at the population level (see UWIN study referenced below). Indeed, the most recent scientific evidence is that avian predation from transmission lines does not impact sage-grouse populations (see None, et al. comments below). At this time, such stories are little more than "urban legend" and lack any solid scientific foundation. For instance, in Moffat County, Colorado a lek within the ROW of the Bonanza 345 kV transmission line and within the WECC corridor has persisted since the line was constructed in the early 1970s and there is no indication of sage-grouse avoidance (as confirmed by data in the possession of the Colorado Division of Parks and Wildlife). Moreover, evidence suggests that anti-perching devices are ineffective at preventing perching and nesting. See the PowerPoint presentation by Sam Milodragovich to the meeting of the Governors' Sage-grouse Habitat Conservation Advisory Council in Helena, Montana on June 11, 2013 attached hereto as Exhibit 9. BLM must not impose mitigation measures, such as requiring anti-perching devices, that are not scientifically proven and demonstrated to be reasonable and cost effective. SSWS-5 should be revised accordingly.	Thank you for your comment. Information from this comment has been considered and incorporated into the FEIS as appropriate.
TransWest Express LLC	264-1445	The DEIS references the Year 8 Status Review by Dan Nonne, Erik Blomberg and James Sedinger from the University of Nevada at Reno regarding impacts to sage-grouse from transmission lines in Nevada. A more recent report is available and provides a summary of the entire 10 year study. In the more recent report the authors state that "Our preliminary analyses investigating the potential impacts from the Falcon-Gondor transmission line suggested no negative effects on demographic rates (i.e., male survival and movement, female survival, pre-fledgling chick survival, and nest survival) that could be explained by an individual's proximity to the transmission line." Nonne, et al., Dynamics of Sage-grouse (<i>Centrocercus urophasianus</i>) Populations in Response to Transmission Lines in Central Nevada, Progress Report: Year 10 (Feb. 2013), p. 33. A copy of the report is attached to this letter as Exhibit 10 and BLM should update the References chapter in the FEIS to reflect these more current study data.	FEIS has been updated to include this information.
TransWest Express LLC	264-1446	The Falcon-Gondor study radio-tracked 376 greater sage-grouse and documented mortality for 87 greater sage-grouse. None of those mortalities were due to collision with the Falcon-Gondor transmission line. This would indicate that the potential for greater sage-grouse collision with transmission lines is low. Such evidence should be presented in the FEIS analysis of impacts. Contrary to what is presented in the DEIS, the Falcon-Gondor study did not identify the transmission line as a barrier to movement, as is described on page 3.8-58 of the DEIS. The Falcon-Gondor study also did not show a negative lek attendance trend for leks located closer to the transmission line. Lek attendance trends actually increased as leks got closer to the transmission line. This data refutes that presented in paragraph three of page 3.8-58. Finally, the Falcon-Gondor study did not show any negative trends associated with nest survival, pre-fledgling survival, or female survival, thus indicating that the transmission line did not negatively influence greater sage-grouse populations.	Thank you for your comment. Information from this comment has been considered and incorporated into the FEIS as appropriate.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1447	The DEIS also did not consider the findings published by the Utah Wildlife in Need (UWIN) Cooperative which found that there were no peer-reviewed, experimental studies designed specifically to evaluate the landscape effects of tall structures on sage-grouse (Contemporary Knowledge and Research Needs Regarding the Potential Effects of Tall Structures on Sage-Grouse (Centrocercus urophasianus and C. minimus), UWIN 2010). The UWTN study includes a literature synthesis including peer-reviewed and non-peer reviewed published studies, technical, and project reports regarding the effects or relationship between sage-grouse and tall structures (the UWIN study did not include the 10 Year study by Nonne, et al. which was released in 2013). The authors found that the literature used to cite impacts on sage-grouse from tall structures is often misquoted or not peer-reviewed, and anecdotal incidents or individual opinions are cited as if they were conclusions from an actual study. The DEIS perpetuates this trend by citing many of the same misquoted or non-peer-reviewed reports and anecdotes and opinions. A copy of the UWIN study is attached to this letter as Exhibit 11. There is some evidence that anti-perching devices may actually aid ravens in the accumulation of nest material (APLIC 2006), which could potentially increase raven predation pressures on sage-grouse nests. Common ravens are known predators of sage-grouse nests, yet ravens are able to overcome anti-perching devices and may even experience higher nesting rates on poles with such devices. In addition, the particular avian predators of sage-grouse in an area should also be considered, as different species exhibit different hunting strategies. For example, golden eagle diet is largely mammalian (80-90%, Kochert, et al. 2002). Golden eagles prey on sage-grouse opportunistically, and typically hunt sage-grouse by swooping from a high soar (Watson 1997, Kochert, et al. 2002). Consequently, power poles may not play an important role in eagle predation of sage-grouse. Golden eagles are vulnerable to electrocution mortality (APLIC 2006) and anti-perching devices have been correlated with increased eagle electrocution risk (PacifiCorp, in prep.). The FEIS should include analysis of the various studies which question the effectiveness of anti-perching devices.	Thank you for your comment. Information from this comment has been considered and incorporated into the FEIS as appropriate.
TransWest Express LLC	264-1448	The BLM must use best available scientific data and information in analyzing impacts and formulating mitigation measures. By not incorporating the findings of Nonne, et al. and UWIN in the DEIS the BLM has failed to do so. The BLM should review Nonne, et al. and UWIN and revise the EIS and mitigation measures appropriately.	Comment noted. Page 4 of the Nonne et al. Falcon to Gondor study progress report cautions that results are not peer reviewed and should be considered preliminary. Results for the UWIN Cooperative Research Project have been incorporated into the FEIS analysis.
TransWest Express LLC	264-1449	The discussion of conservation measures being implemented by BLM on p. 3.8-13 of the DEIS refers to areas identified as PPH and PGH. These acronyms should be added to the Abbreviations and Acronyms list and should be defined in the Glossary. In addition, the reference to BLM IM 2010-043 on p. 3.8-13 should be corrected to 2012-043.	Text has been modified as requested.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1450	TransWest has provided the framework for the transmission line ROW Vegetation Management Plan in Section 3.6.2.2 of its Project Description Technical Report (DEIS Appendix D). While that framework is referenced on p. 3.5-33 of the DEIS, the DEIS does not highlight the three distinct desired conditions and implementation details provided in the framework (Level 1, Level 2 and Level 3, DEIS App. D at p. 94-106). The ROW Vegetation Management Plan framework, like all other elements in the PDTR (Appendix D), was developed with input and approval from Western and in accordance with the NERC Reliability Standards. Mitigation Measure VG-2 (DEIS, p. 3.5-37 and App. C, p. C-123) states that "Woody areas such as pinion-juniper, which are on average taller than the 6 ft minimum clearance, but with wide spacing between the trees allowing vehicle and equipment access to the transmission line ROW, would not be cleared during construction activities. This measure would consider conductor clearance requirements." (Emphasis added.) TransWest agrees that, outside the 250-foot wide ROW, it will selectively clear tall vegetation rather than removing all tall shrubs and bushes within access routes to the boundary of the 250-foot ROW. However, within that ROW, TransWest has proposed Level 1 desired condition, in which, consistent with NERC Reliability Standards and cost-effective construction and maintenance, it will clear all vegetation in excess of 6 feet in height. See DEIS App. D, p. 94: "Level 1 is the Applicant's desired condition for the majority of the TWE Project ROW. Level 1 represents the most effective way to meet and exceed the NERC standards in a cost-effective manner. ... The Level 1 desired condition is characterized by stable, low growth plant communities, free of noxious or invasive plants. . . . Vegetation heights would average three feet in height, and may range between two feet and six feet." It is only in Levels 2 and 3 desired condition areas where TransWest has proposed much more costly vegetation treatment that may selectively allow some vegetation within portions of the 250-foot ROW that exceeds 6 feet in height, but still meets NERC Reliability Standards. Level 2 vegetation management could be applied, for example, in VRM Class III landscapes or sensitive wildlife habitats susceptible to forest fragmentation impacts (DEIS, App. D at p. 95) and Level 3 vegetation management could be applied, for example, in areas where the ROW crosses riparian vegetation or in VRM Class II areas (DEIS, App. D at p. 105). TransWest requests that BLM clarify the FEIS to reflect the areas in which Level 2 and Level 3 vegetation management techniques may be applied and to correct any inference that vegetation exceeding six feet in height may be allowed throughout the entire length of the ROW. Mitigation Measure VG-2 should also be revised to clarify that vegetation exceeding six feet in height may be permitted in limited areas within the 250-foot ROW as described in Appendix D.	The Final EIS mitigation measures that require vegetation management reference TransWest's vegetation management levels as described in Appendix D of the Final EIS.
TransWest Express LLC	264-1451	TransWest requests that similar clarifications be made to Section 3.12 (Visual Resources) to clarify the areas in which Level 2 and Level 3 vegetation management may be applied. In addition, Mitigation Measure VR-1 (DEIS, p. 3.12-22 and App. Cat p. C-129) should be revised to reflect that pinion-juniper trees in excess of six feet in height may be allowed to remain within the 250-foot ROW only in areas where highly sensitive resources exist (as described in App. D, p. 95-106) and only within those areas to the extent that NERC Reliability Standards are not compromised.	The Final EIS mitigation measures that require vegetation management has been updated to reference TransWest's vegetation management levels. Level 3 mitigation will be applied to those immediate foreground viewsheds of designated KOPs and ROS classes specified by the USFS.
TransWest Express LLC	264-1453	In several locations in the DEIS, the BLM refers to non-block cleared areas for black-footed ferret. The DEIS should be updated to reflect the fact that the FWS issued a letter to the State of Wyoming on March 6, 2013 stating that block clearances had been applied to the entire State of Wyoming and that the likelihood of finding black-footed ferret populations outside the existing re-introduction sites is highly unlikely. This new information will assist the public's understanding of potential impacts of the proposed action to black-footed ferret populations in Wyoming. The FEIS should be updated to clarify that pre-construction surveys for black-footed ferrets are not required in Wyoming (see, for example, DEIS, p. 3.8-63).	DEIS Section 3.8.4.1 Federally Listed and Candidate Species (DEIS Page 3.8-19) states that all of Wyoming has been block cleared for the requirement to preform black-footed ferret surveys (USFWS 2013). All references to non-block cleared areas have been removed from the FEIS text.
TransWest Express LLC	264-1454	Although Alternative II-A (Applicant Proposal) could affect a state park and the most Utah wildlife management areas ("WMAs"), the DEIS notes that the Alternative II-A transmission line would be located on the opposite side of the reservoir in Starvation State Park from the developed camping area, and "scenic views are not anticipated to be highly affected as the area is already disturbed by oil and gas wells and the existing steel lattice structures of an existing transmission line." DEIS, p. 3.13-61. Obviously, the impacts of the Project on a state park which is already impacted by oil and gas operations and an existing transmission line will not be significant. In addition, implementation of mitigation measure REC-4 would minimize impacts to WMAs.	As discussed in Section 3.13.6.10, although the developed camping area at Starvation State Park would not be affected and scenic views are not anticipated to be highly affected, the Rabbit Gulch primitive camping area at the state park would be affected as noted in the text: "...but [the corridor] would be near the Rabbit Gulch primitive camping area. Campers in this area would be most disturbed by the sights and sounds of construction." Therefore, Alternative II-A would affect the state park as the text and Alternative II conclusion state.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1455	With respect to the impacts on recreation in Region III, the DEIS concludes that Alternative III-A (Applicant Proposal) would have greater impacts than the agency Preferred Alternative (III-B) because it could affect a popular OHV area in the St. George Field Office. However, that conclusion is undercut by Section 3.13.6.3 which notes that the presence of construction activity and some human-constructed structures are acceptable to OHV users, though road or trail closures during construction or operation would adversely affect this user group. Those concerns would be mitigated by implementation of mitigation measures REC-6 and REC-9. In addition, if new roads were left open for use by the public, this would be considered a beneficial impact due to additional OHV access, DEIS at p. 3.13-30. Consequently, the analysis in the DEIS of impacts on recreation does not clearly support the selection of the agency Preferred Alternative in Regions I, II and III.	As noted in the conclusion in Section 3.13.6.11, in comparison to Alternative III-B, Alternative III-A would affect additional recreation areas, including Dixie National Forest and would affect recreation within a popular OHV area in the St. George FO. The text in 3.13.6.11 notes that Alternative III-A would cross popular OHV routes near and within the Beaver Dam Wash NCA and would affect two trailheads. However, other trailheads would be available and most of the NCA would not be affected. Even with mitigation measures, Alternative III-A would still permanently affect more recreation areas than Alternative III-B, thus supporting the conclusion that Alternative III-B would have the least impact on recreation use, activities, and settings.
TransWest Express LLC	264-1456	Sections 4.4.15 through 4.4.19 all contain a statement for each of the five national forests potentially affected by the Project to the effect that, "although the USFS has not identified any plan amendments for the alternate route at this time, the USFS may identify plan amendments in response to additional information learned through the EIS process to fulfill the intent of standards and guidelines in the areas affected." TransWest assumes that these statements were included merely to underscore the obligation of the Forest Service under 36 C.F.R. §219.15(d) to confirm that projects comply with applicable standards and guidelines contained in the relevant land and resource management plan. As a cooperating agency, the Forest Service presumably should have known, as the DEIS was prepared, whether a plan amendment would be necessary to comply with applicable standards and guidelines of the existing plans for the proposed action and the alternatives analyzed. The FEIS should reflect with certainty whether any LRMP amendments are required for the Applicant Proposal and alternatives.	Due to the lack of detailed project information at the Draft EIS stage, the USFS requested the statement to be included to allow them to consider plan amendments as more site-specific project information becomes available. Since the Applicant has since provided more detail for the Final EIS, plan consistency tables have been completed for the USFS to allow any associated plan amendments to be updated in the Final EIS.
TransWest Express LLC	264-1457	Section 1.6 should be supplemented in the FEIS to note that there is no federal or state condemnation authority over tribal lands. See the discussion above under Part I, Region II (parameter 6.a.).	Section 1.6 was revised to include information regarding restrictions on the exercise of eminent domain on tribal lands.
TransWest Express LLC	264-1458	Section 1.4.2.4 states that, if portions of the Project are to be constructed on tribal lands, the BIA would prepare a ROW grant for tribal lands. This section should be clarified in the FEIS to explain that, while BIA must approve a tribal grant of a right-of-way, the tribe or tribes whose lands are affected actually grant the right-of-way, and the BIA cannot compel the tribe to grant such a right-of-way.	Section 1.4.2.4 was revised to clarify the respective authorities for granting Rights-of-Way by the BIA and the tribes.
Trout Unlimited	598-808	Trout Unlimited (TU) provided scoping comments in April 2011 for this project and we appreciate the hard work the BLM has conducted on its analysis. It is apparent that the BLM incorporated TU's comments into their planning process, and the document has improved as a result.	Thank you for your comment.
Trout Unlimited	598-809	Thus, we support using existing corridors when not precluded by homeland security or other laws. The BLM should look for ways to maximize use of existing corridors to the extent possible.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. One of the criteria considered in the choice of the Agency Preferred Alternative included maximizing the use of existing designated utility corridors (See Chapter 2 of the Draft EIS).
Trout Unlimited	598-812	Seven lakes/reservoirs within the 2-mile study corridor will be impacted under Alternative A. Because many of these lakes and reservoirs are public recreation areas for coldwater fisheries, we encourage the BLM to apply a buffer of 500 feet or greater from the water's edge for surface disturbances. In addition, the BLM should prohibit refueling of vehicles and construction equipment within 500 feet of these water bodies.	Design feature TWE-24 restricts refueling within 100 feet of wetlands and waterbodies. This buffer distance could be extended up to 500 feet by following BLM and Forest Service management guidance protection depending on the public land ownership and the location of the lake or reservoir in relation to the refined corridor construction areas. The BLM has not recommended a cross-the-project buffer distance of 500 feet, since it does not follow some of the BLM Field Offices.
Trout Unlimited	598-813	Should the BLM select Alternative D (Agency Preferred) which impacts 5 lakes/reservoirs, we support the same recommendations as those we recommended for Alternative A.	Although the alternative analysis corridors cross varying numbers of waterbodies, the selection of a preferred alternative is not based on the alternative with the lowest number of waterbodies. BMPs, design features, and additional mitigation would be implemented to minimize direct disturbance to waterbodies during construction.
Trout Unlimited	598-814	Region II: TU supports Alternative A with route deviations to avoid impacts to cutthroat trout waters. The transmission line crosses the most perennial streams through this Region and TU recommends avoiding as many stream crossings as technically feasible, even if this means finding new alternative routes. Many of these stream crossings contain USFS MIS (Management Indicator Species) that are cutthroat trout; other stream crossings include Blue Ribbon Fisheries (Strawberry River).	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Section 3.10 contains measures that would minimize stream crossings as requested by the comment, regardless of the approved transmission line alternative.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Trout Unlimited	598-815	Alternative A (Applicant's preferred route) crosses 26 perennial streams within the 250 foot ROW, compared to 30 perennial stream crossings proposed under the BLM's preferred alternative (Alternative F). Though the number of stream crossings are less under Alternative A, this route does cross through more MIS habitat than Alternative F (4 streams containing Bonneville and Colorado River cutthroat in Alternative A compared to 2 streams containing Bonneville cutthroat in Alternative F). However, Alternative A is co-located with existing power line right of ways while the other alternatives (including BLM's preferred Alternative F) cross through significantly more undisturbed landscapes, including WSAs and LWCs, than does Alternative A. Accordingly, we recommend the BLM select Alternative A through Region II, but alter route segments to avoid, as much as possible, stream crossings of cutthroat trout waters.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Section 3.10 contains measures that would minimize the effects of possible stream crossings, as indicated in the comment, regardless of the approved transmission line alternative.
Trout Unlimited	598-818	The required agency Plan Amendments for both the BLM and the USFS should include updated fisheries information for native cutthroat trout species(1) and impaired waters, and should consider stronger stipulations to protect watersheds. (1) For instance, updates to the Colorado River Cutthroat Trout Conservation Agreement and range-wide assessment have just been released and new data is available for agency use (Range-Wide Status of Colorado River Cutthroat Trout: 2010. Hirsch, Christine, et.al. dated July 2013). In addition, considerable research on genetic purity of Greenback Cutthroat trout and Colorado River cutthroat trout has been ongoing since 2012 in Colorado. Colorado Parks and Wildlife and US Fish and Wildlife Service have management activities associated with Greenback data assessment and petitions for listing which might require further analysis in the DEIS ("Genetic purity assessment of select Colorado River cutthroat trout populations in northwest Colorado". Rogers, Kevin, et. al., Colorado Parks and Wildlife. January 15, 2012).	Updated fisheries information pertinent to the Project have been included in the aquatic resource sections, 3.9 and 3.10. Chapter 4 uses the baseline information described in those chapters, but discloses associated impacts from proposed plan amendments.
Trout Unlimited	598-819	Specifically, we recommend that the BLM and USFS apply disturbance buffers of 500 feet or more from the edge of riparian vegetation of perennial waters for fueling and other chemical-related equipment construction. Because of the high number of important aquatic habitats the line proposes to cross, TU believes the application of a 500-foot buffer for fueling and chemical related construction activities will help prevent contamination from surface runoff to important waters.	The applicant design feature TWE-24 in the DEIS specified a buffer distance of 100 feet from waterbodies for refueling. This buffer distance is extended up to 500 feet in some BLM Field Office areas and Forest lands.
Trout Unlimited	598-821	Where plan amendments are not required, however, we recommend the BLM create an across-the-project riparian/stream setback buffer of 500 feet or greater for all perennial waters for refueling activities and construction using hazardous chemical in the Final EIS. Because the majority of equipment will be using diesel fuel, the implementation of a stronger buffer (than the current 100 foot) around perennial waters will provide an added protection measure for these important waters. Many USFS plans and BLM plans have implemented such buffer stipulations (including the Little Snake FO in Colorado) for energy development activities. For intermittent or ephemeral streams, a 300 foot buffer is acceptable for construction activities as long as these streams are not considered important spawning or brood rearing waters.	Design feature TWE-24 restricts refueling within 100 feet of wetlands and streams. This buffer distance could be extended up to 500 feet by following BLM and Forest Service management guidance protection. The BLM has not recommended an across-the-project buffer distance of 500 feet, since it does not follow some of the BLM Field Offices' management restrictions.
Trout Unlimited	598-822	TU believes it is wise to have a strong stipulation attached up front. Once on-the-ground and site-specific project design is completed, adjustments to that buffer can be made. While we understand that specific design criteria exist to implement "safe" crossing of streams, the size and width of this ROW, the number of streams and rivers this line crosses (especially for those routes proposed in remote backcountry areas), and the required construction equipment and infrastructure necessary to achieve project implementation, necessitates a prudent and safe buffer to minimize potential impacts from spills to sensitive and threatened aquatic species.	The EIS incorporates by reference the relevant land use planning documents to define prudent and safe buffers to water ways (See Appendix C of the Draft EIS). Additional mitigation is identified in the Water Resources and Special Status Aquatic Species sections (sections 3.4 and 3.10, respectively) of the Final EIS.
Trout Unlimited	598-823	The BLM can improve the detail of its NEPA analysis on BLM lands, and more significantly, for USFS lands. We request that a more thorough level of analysis for those landscapes and ecosystems that will be both temporarily and permanently impacted be provided in advance of any actual construction activities and that opportunities for adapting construction activities as a result of any new findings be outlined. This includes more detailed analysis of impacts to sensitive coldwater fish populations, water quality, erosion and sedimentation effects downstream from river and creek crossings, fire issues associated with such a large-sized project that could cross through forests, and monitoring for reclamation of sensitive areas for greater than a 2 to 3 year period.	As discussed in Section 3.9.6.1, BMPs and applicant design features would be followed to minimize the potential effects to aquatic habitat and species. These same protection measures are also referenced in Section 3.10.6.2 for protection to streams that contain special status aquatic species. Mitigation measure SSS-3 was revised in Section 3.10.6.3 to include the development of a stream crossing plan, with approval by the state agencies' aquatic biologists. These measures would provide protection for aquatic habitat and species and therefore, no monitoring is recommended. Erosion and sedimentation are discussed in Sections 3.3 Soils, and 3.4 Water Resources. Effects on fire regime is discussed in Section 3.21 Wildland Fire.

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Commenter Name	Comment ID	Extracted Comment	Response
Trout Unlimited	598-824	Because of the high number of stream crossings and their predominance within USFS lands, TU recommends that state resource agencies' aquatic biologists be consulted on the development of on-site crossing plans. Many of these streams are headwater streams containing native cutthroat trout, which can be particularly sensitive to sedimentation and erosion deposition. While we believe the DEIS contained adequate analysis for aquatic biological resources, the importance of on-site collaboration with aquatic resource specialists (who are not construction engineers) cannot be minimized. State agencies regional staffs are designated with the authority and expertise to manage fish and wildlife resources and have a professional understanding of the use and implementation of fish friendly crossings	Mitigation measure SSS-3 was revised in Section 3.10.6.3 to include the development of a stream crossing plan, with approval by the state agencies' aquatic biologists.
Trout Unlimited	598-825	Areas identified for potential ground electrode sites in the Draft EIS (Chapter 3.20-3 through 3.20-5) contain substantial amounts of BLM lands with streams or rivers and important backcountry areas such as LWCs. For example, Region 1 in the Little Snake BLM Field Office (FO) contains 2 proposed sites for the Little Snake East and Little Snake West ground electrode site. Both sites are located within LWCs and are predominately outside the 2 mile corridor study area. They also border the Little Snake River, a popular coldwater fishery in Colorado. These two areas total more than 12,000 acres. TU is concerned with the siting and the lack of detailed analysis of the impacts of these electrode sites. These landscapes are outside of the 2 mile corridor study area, contain BLM lands, and according to the DEIS, did not receive the NEPA analysis that those lands within the 2 mile corridor did. Many of the LWC lands are currently undergoing agency inventory analysis and thus, it is understandable that the information is not available for this DEIS. However, we suggest that for those landscapes identified for ground electrode sites, alternative connector sites, or other transmission infrastructure activity, NEPA analysis should be completed and that the electrode sites be placed outside important landscape areas. We understand that Transwest is currently evaluating other alternatives for the electrode sites which could make this comment moot for the Final EIS.	The Draft EIS contained subsections for each resource with a specific analysis for the ground electrode sites, including those that were considered in the BLM Little Snake Office in Colorado (for section 3.20, see Table 3.20-2 of the Draft EIS). While adequate disclosure of impacts specific to these locations were in the Draft EIS, the Little Snake West and Little Snake East ground electrode siting areas have been removed from consideration in the TransWest Final EIS analysis at the request of the lead agencies in response to resource concerns raised during the Draft EIS public comment period.
Trout Unlimited	598-826	The DEIS fails to account for impacts that may occur to sportsmen should the line be constructed during angling and hunting seasons. While the DEIS mentions that increased fishing might occur from the presence of transmission project workers while in the vicinity of stream crossings, it does not account for the potential loss of fishing access to recreational anglers that otherwise use the area. The DEIS also does not account for the impact to hunters and hunting access. Therefore, The FEIS should contain a more thorough discussion of how the applicant would avoid or mitigate these impacts, including notices to the public and communication of any access that may be limited.	Section 3.13.6 (DEIS pages 3.13-29 to 101) describes impacts to both recreational fishing and hunting user groups, specifically identifying impacts to both uses in dispersed as well as specific recreation areas, along with reductions in access, increases in noise and wildlife disturbance, construction during certain seasons, etc. that would affect both of these uses. The section also includes specific mitigation measures to address construction and operation impacts during big game hunting seasons as well as maintaining access to recreation areas. Therefore, the EIS already discusses impacts to fishing access, recreational anglers, hunters, and hunting access.
Trout Unlimited	598-827	The discussion on Transportation in the DEIS does not account for the number of new roads that will be developed that might have to cross streams. Roads crossing streams and road development is discussed but in other areas of the DEIS. The Transportation Section should include a more robust discussion of the significance of the number of new roads, especially where the line crosses through USFS lands.	The number of stream crossings created by the proposed Road Access Plans will be considered when they are subject to review and approval by appropriate local, state and federal agencies. The effects of stream crossings caused by road construction are addressed elsewhere in the EIS, specifically in aquatic and water resources, since discussion of these potential biological effects, and Section 3.16 refer to other sections of the EIS for non-transportation and access effects of the alternatives. If the proposed Road Access Plans cause impacts on streams, appropriate site-specific conditions of approval and mitigation will be defined as part of the pending approval processes. Section 3.16 was revised to clarify how the five applicable U.S. Forest Service Travel Management Plans will be addressed when individual Road Access Plans are submitted for review.
Trout Unlimited	598-828	TU commends the BLM for its analysis and thoughtful route planning for this significant transmission line.	Thank you for your comment.
Trout Unlimited	598-829	The siting of the TransWest Express project is, for the most part, concentrated on lands within and immediately adjacent to highly altered landscapes. We appreciate the effort the BLM provided in the DEIS in attempts to avoid, as much as possible, landscapes with high ecological integrity. We find that Alternative A, the applicant's preferred alternative through all 4 regions of line access, tends to seek the route with the most human impact and we appreciate this. We are concerned, however, with the route as it crosses through important native fish waters and protected landscapes. Further fragmentation of some of these landscapes could increase loss of fish and wildlife biodiversity, potentially impede wildlife movements, and reduce habitat function. Accordingly, we have recommended slight deviations from the Alternative A in our above comments.	Thank you for your comments.
Tuck, Latrichia	257-299	The TWE transmission line had many alternative routes listed in the Environmental Impact Statement released to the public, yet when looking at the map of the region, it's easily evident that some stray far from the path of the others and covers more ground. To ordinary citizens, this means more mileage, greater costs, and greater impact than is actually necessary. I realize that much of the time many different alternatives are necessary or even required before a project is allowed to progress, but we've all waited long enough. I kindly ask you to use your reason and begin to eliminate potential options for the transmission line. This should start with the route extending through Rio Blanco County and Garfield County.	Section 2.5.1.2 of the Draft EIS provides rationale for the retention of each alternative by region. The analysis contained in the Draft EIS validated the rationale for retaining Alternatives II-B and II-C; therefore these alternatives have not been eliminated between draft and final EISs. The impacts of these routes (including mileage) are disclosed in Chapter 3 and summarized in Table 2.23. While the route remains retained for analysis, it is not the agency preferred alternative.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
U.S. Department of Defense - Navy	645-1297	First of all I would like to express our appreciation for the revision in the preferred routes from section 520 and 610, to sections 510 and 600. This change helps to address many concerns for operations in the Desert MOA used by test aircraft operating in and around Nellis AFB and NITR.	Thank you for your comment.
U.S. Department of Defense - Navy	645-1298	However, roughly 25 miles of the project is under the Sevier MOA (west of Delta, UT), which would have significant impacts on the military mission. Attached is a slide showing the TransWest transmission line in relation to where it deviates from a line already in existence. Also attached is a slide of the route in relation to the Sevier MOA. It is my understanding that the current line is within a power line corridor. We highly recommend the TransWest line stay within the existing corridor (section 460); that would address many concerns. The current route for the transmission line will interfere with our ability to train at extreme low level. There are few places in US airspace that allow flight to 100' AGL, other than the Utah Test and Training Range (UTTR) and the Nevada Test and Training Range. The UTTR supports about 1,200 sorties annually that train in the 100' AGL regime. There is also an impact to cruise missile testing in the Sevier MOA. The UTTR was designed in 1979 specifically to support cruise missile testing and continues to this day. The other issue we have is the potential impact on Terminal Instrument Procedures (TERPs) near Nellis AFB. The Air Force has expressed concern and will need to review the final route once published, including final pole location, based on TERPs. (Air Combat Command, Mr. Eric Nelson, HQ ACC/A3A, 757-764-4661 and Air Force Materiel Command, Mr. David Steckel, HQ AFMC/A3F -Range & Encroachment, 937-656-0099 Crul further address the specifics of this issue). Please see the attached departure traps slide.	These concerns are disclosed in Section 3.16, Transportation. Your concerns will be considered by the lead agencies as they consider which alternative to implement in their Record of Decision.
U.S. Fish and Wildlife Service	556-1000	Page 2-57; Section 2.8.1 Parameter 5 lists raptors as a resource not regulated by law. Under the Migratory Bird Treaty Act (MBTA), the Bald and Golden Eagle Protection Act (Eagle Act), and Executive Order 13186 (66 FR 3853; January 17, 2001), Federal agencies have an obligation to protect all species of migratory birds, including eagles and other raptors, which may occur on lands under their jurisdiction. Of particular focus are the species identified in the Service's Birds of Conservation Concern (BCC; 2008). In accordance with the Fish and Wildlife Coordination Act (16 USC 2912 (a)(3)), this BCC list identifies "species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing" under the ESA. This BCC list is intended to stimulate coordinated and proactive conservation actions among Federal, State, and private partners and is available at http://library.fws.gov/bird_publications/bcc2008.pdf . The MBTA, enacted in 1918, prohibits the taking of any migratory birds, their parts, nests, or eggs except as permitted by regulations, and does not require intent to be proven. Section 703 of the MBTA states, "Unless and except as permitted by regulations ... it shall be unlawful at any time, by any means or in any manner, to ... take, capture, kill, attempt to take, capture, or kill, or possess ... any migratory bird, any part, nest, or eggs of any such bird...." The Eagle Act prohibits knowingly taking, or taking with wanton disregard for the consequences of an activity, any bald or golden eagle or their body parts, nests, or eggs, which includes collection, molestation, disturbance, or killing. The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." The term "disturb" under the Eagle Act is defined as: "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior" (72 FR 31332). The Service makes recommendations regarding nest buffer distances to assist in project compliance with the MBTA and Eagle Act.	Criteria #5 (raptor nests w/in 1 mile) has been removed from text of Section 2.8.1.
U.S. Fish and Wildlife Service	556-1001	Page 2-59; Section Table 2-23 The vegetation section of Table 2-23 states that wetlands and riparian areas will be affected by facilities construction. The Service understands that Western has a policy to avoid federally listed plants, and there is at least one listed plant species within riparian and wetland habitats throughout the length of the project. The Service recommends that riparian areas and wetlands be avoided by the project, and if that is not possible, that they be spanned in locations that require the least amount of vegetation trimming and clearing. Any potential effects to federally listed plants should be evaluated and appropriately addressed through the ESA section 7 process in coordination with the Service.	The proposed wetland mitigation measures WET-1 to WET-4 would minimize impacts to wetlands and prevent surface disturbance from facilities construction within 500 ft of any wetland or riparian area. Any potential effects to federally listed plant species will be evaluated and addressed through the ESA Section 7 process associated with the Project.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1002	Page 2-60; Section Table 2-23 The Service recommends clarification that the number of IBAs crossed by the 2-mile transmission corridor is actually the number of acres crossed by the 2-mile corridor. Additionally, it should be clarified whether the value is the number of acres within the IBA or whether that is the number of acres that fall within the 2-mile corridor.	Text in Chapter 2 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1003	Page 2-60 to 2-61; Section Table 2-23 The aquatic biological resources section of Table 2-23 does not include the effects of depletions on listed species downstream of the Project. We recommend including an additional row that allows for the comparison of the number of structures built as well as the acres of access roads that may need dust abatement for each alternative that will be constructed using water from the Platte River and Colorado River basins. In general, depletions include evaporative losses and/or consumptive use of surface or groundwater within the affected basin, often characterized as diversions less return flows. Project elements that could be associated with depletions include, but are not limited to, ponds, lakes, reservoirs, hydrostatic testing of pipelines, wells, dust abatement, diversion structures, and water treatment facilities. Any actions that may result in a water depletion should be identified. The document should include an estimate of the amount and timing of average annual water use (both historic and new uses) and methods of arriving at such estimates; location of where water use or diversion would occur, as specifically as possible; if and when the water will be returned to the system; and the intended use of the water. Depending upon the details of the project, the Service may have more specific questions regarding the potential consumptive use of water. If the proposed action may lead to consumptive use of water or have the potential to affect water quality in the Platte River System or the Upper Colorado River, there may be impacts to threatened and endangered species inhabiting the downstream reaches of these river systems, as well as their designated critical habitats. Formal interagency consultation under section 7 of the ESA is required for projects that may lead to depletions of water from any system that is a tributary to the Platte River System or the Upper Colorado River.	Rows were added to Table 2-23 (Region I), 2-24 (Region II), 2-25 (Region III) for potential water depletion effects on aquatic biological resources and federally listed species. The parameter used in the tables was the estimated volume (acre-feet) of water to be used for construction.
U.S. Fish and Wildlife Service	556-1004	Page 2-135; Section Table 2-27 The Service requests clarification regarding the occupied greater sage-grouse leks within 4 miles of the reference line described for construction and operation acreages. The agency-preferred alternative is listed as having 62 acres of construction impacts occurring within 4 miles of occupied sage-grouse leks, but 0 acres of impacts resulting from operations. This either implies that the leks will move to outside the 4 mile buffer after construction or that on-going operations of a transmission line have no effect on sage-grouse.	The FEIS has been modified to address this comment.
U.S. Fish and Wildlife Service	556-1005	Page 2-136; Section Table 2-27 The Service recommends adding a row under aquatic biological resources or special status for impact to listed species as a result from depletions of the Platte River and Colorado River basins.	Rows were added to Table 2-27 for potential water depletion effects on aquatic biological resources and federally listed species. The impact indicator was the estimated volume of water in acre-feet to be used for construction.
U.S. Fish and Wildlife Service	556-1006	Page 3; Section General We recommend against the approach used to develop this DEIS of combining Affected Environment material with Environmental Consequences material as was done in Chapter 3 for all affected resources. Instead, we recommend that a typical approach be used where the Affected Environment material and Environmental Consequences material are provided in two separate and distinct chapters.	The BLM NEPA Handbook provides a suggested format for an EIS that includes separate Affected Environment and Environmental Consequence chapters; however, it also allows that the specific EIS elements and their order should remain flexible and that in some instances it may be desirable to combine Chapters 3 and 4 into one chapter. The combined chapter is the BLM and Western's preferred format for this EIS, and because it is consistent with the format of other recently released and soon-to-be released interstate transmission line EISs.
U.S. Fish and Wildlife Service	556-1007	Page 3.4-21; Section 3.4.6.3 The Service acknowledges the discussion regarding water use for transmission line construction. We recommend discussing the effects of water use on federally listed species downstream of the project in the Platte River and Upper Colorado River basins. The FEIS should include a commitment to address the potential impacts of depletions on federally listed species in the Platte River and the Upper Colorado River basins, in addition to potential direct effects of project design, construction, and operation and maintenance.	ESA Consultation with the USFWS is discussed in the Special Status Wildlife Species and Special Status Aquatic Species sections (sections 3.8 and 3.10, respectively, of the Draft EIS). The Final EIS has been revised to clearly indicate the potential Section 7 requirements associated with depletions from the Platte River and Upper Colorado River Basins that may not have been previously consulted on.
U.S. Fish and Wildlife Service	556-1009	Page 3.5-25 to 3.5-27; Section 3.5.6.1 It is not clear why 504 acres of vegetated land would be directly disturbed for the Northern Terminal, with the entire area being cleared, sterilized, and covered with crushed rock, and then 270 acres would be reclaimed, leaving 234 acres impacted during the life of the project. We recommend clarification on the locations and amounts of actual vegetation removal and site preparation and reclamation.	The text has been updated to be clearer. There would be temporary construction disturbance beyond the permanent facility area. The permanent facility area would be cleared, sterilized and covered with crushed rock, and the temporary construction area would be reclaimed upon completion of construction activities.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1010	Page 3.5-33; Section 3.5.6.2The DEIS states that “Vegetation over 6 feet in height would be cleared or removed as described below. Vegetation over 6 feet in height predominantly would include trees and larger shrub species found in the following vegetation community types: Aspen Forest and Woodland, Conifer Forest, Deciduous Forest, Pinion-Juniper, and Woody Riparian and Wetlands. Low-growing trees, shrubs, and ground vegetation under 6 feet in height would be left in place. Trees to be cleared would be cut off at ground level, and the stumps left in place for erosion control.” The Service recommends that only woody vegetation that poses a threat to operations of the transmission line (i.e. conductor clearance) be removed, as a blanket removal of all vegetation over 6 feet is not necessary, particularly where the line may span valleys, canyons, and similar topography. Removal of woody vegetation beneath the wire zone of the Project could fragment important habitat for migratory birds and federally listed species, particularly for species that require large areas of treed habitat or use those areas for migration or dispersal.	The removal of vegetation over 6 ft in height is the maximum height in the ROW for the Level 1 vegetation management level as described in the PDTR (Appendix D of DEIS). Justification for the six feet height requirement for the Level 1 vegetation management level is provided in the PDTR, Section 3.6.2.2.For the DEIS analysis, it was assumed that vegetation management Level 1 would be applied to the entire ROW. For the FEIS, the analysis has been refined to include Level 2 and Level 3 vegetation management, which would be applied in limited areas (typically Visual Class II, and III, riparian crossings, and areas of sensitive wildlife habitats susceptible to forest fragmentation impacts) and is described in the relevant resource sections. Revised analysis has been included in Section 3.5.6 to consider this mitigation.
U.S. Fish and Wildlife Service	556-1011	Page 3.6-1 thru 3.6-84; Section 3.6.6 In anticipation of section 7 consultation under the ESA, we recommend that you create tables that identify which avoidance, minimization and mitigation measures will apply to each species. Please also identify the source of each measure (e.g. TWE, BLM, WWEC, etc.) In reading through Section 3.6.6 it is difficult to make this determination as the measures and analyses are found on a number of different pages depending on the alternative discussed and the project phase discussed.	The text has been clarified in Section 3.6.6 regarding the sources of avoidance, minimization, and mitigation measures. A table of mitigation measures and which species they apply to will be included in the Biological Assessment.
U.S. Fish and Wildlife Service	556-1012	Page 3.6-2 – 3.6-9; Section 3.6.4.1 In general, as I read through each plant description in this section, I found that there were errors in associating species documentation with the various Alternatives. For example, the text states that clay phacelia has only been documented within, and immediately adjacent to, the 2-mile transmission line corridor for Alternative II-E. However, we believe it has also been documented within Alternative II-F. Recommend review of this section for accuracy.	The text in the Final EIS has been reviewed and updated as appropriate for consistency.
U.S. Fish and Wildlife Service	556-1013	Page 3.6-5; Section 3.6.4.1 Please update the section regarding Graham’s penstemon to reference the Service’s most recent proposal for listing, dated August 6, 2013 (78 FR 47590). Also, please disclose the proposal of the same date for designation of critical habitat for the species (78 FR 47831-47858). You may wish to contact the Utah Field Office for proposed critical habitat shape files.	The text has been updated as requested.
U.S. Fish and Wildlife Service	556-1014	Page 3.6-5; Section 3.6.4.1 Please update the section about White River penstemon to reference the Service’s most recent proposal for listing, dated August 6, 2013 (78 FR 47590). Also, please disclose the proposal of the same date for designation of critical habitat for the species (78 FR 47831-47858). You may contact the Utah Field Office for proposed critical habitat shape files.	The change in status, and critical habitat recently designated for the species, has been updated in the document and included in the impact analysis for the FEIS in Section 3.6.
U.S. Fish and Wildlife Service	556-1015	Page 3.6-3, 3.6-64, 3.6-69, 3.6-71; Section 3.6 Las Vegas buckwheat may be affected by the transmission line. Please evaluate the potential for project effects to this species.	Potential impacts to Las Vegas Buckwheat are discussed under the header Las Vegas Buckwheat in Section 3.6.6.6.
U.S. Fish and Wildlife Service	556-1016	Page 3.6-6; Section 3.6.4.1 Recent information suggests that clay phacelia is a true biennial as opposed to a winter annual as described in the text. (Citation: Meyer, S. 2011. Research Ecologist, USFS RMRS Shrub Sciences Lab, Provo, Utah. Personal communication.)	The text has been updated to reflect the information provided.
U.S. Fish and Wildlife Service	556-1017	Page 3.6-16; Section 3.6.6 Table 3-6: For the resource topic “Potential loss of individuals and/or suitable or occupied habitats as a result of construction and operation activities”, recommend that the EIS add an evaluation of construction/operation-induced erosion and its effects to special status plant species. Project activities considered should include those associated with pre-construction (e.g. line surveys), construction, maintenance and operation.	Potential impacts from erosion on special status species are discussed in Section 3.6.6.1 Impacts from Terminal Construction and Operation, and Section 3.6.6.2 Impacts Common to All Alternatives. Further discussion is included in Section 3.5 Vegetation, and Section 3.3 Soils.
U.S. Fish and Wildlife Service	556-1018	Page 3.6-17; Section 3.6.6 Table 3.6-6: For the resource topic “potential loss of pollinators”, recommend that you expand the Analysis Considerations to say, “The analysis will evaluate indirect effects associated with potential loss of pollinators due to fugitive dust emissions, herbicide application and drift, loss of alternate pollen/nectar plants, and habitat fragmentation.”	The text has been updated as requested.
U.S. Fish and Wildlife Service	556-1019	Page 3.6-17; Section 3.6.6 Table 3.6-6: Recommend the addition of “Exposure to herbicides” as a Resource Topic. The Analysis could then evaluate direct effects (e.g. decrease in viability/vigor/persistence and mortality) to special status species. It should also evaluate indirect effects to special status species from loss of pollinators that are directly killed by herbicides and that are indirectly affected by loss of alternate pollen/nectar plants.	Herbicide will follow the BLM guidelines and requirements outlined in the Final BLM Vegetation Treatment Using Herbicides Programmatic EIS, and its associated BA. The discussion of herbicide impacts are discussed in Section 3.5 Vegetation, along with recommend mitigation, the remaining discussion is covered under the operations section.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1020	Page 3.6-17; Section 3.6.6The DEIS states that the analysis “assumes that the USFWS will continue to have jurisdiction over the management of federally endangered, threatened, proposed, and candidate species populations.” The state wildlife agency within a given state has jurisdiction over candidate species.	The text has been revised as requested.
U.S. Fish and Wildlife Service	556-1021	Page 3.6-18; Section 3.6.6.1 The DEIS states that both direct and indirect impacts can be grouped into two categories: 1) loss of individuals/ populations and 2) loss of potentially suitable habitat. However, these two categories should fall under only direct effect. Indirect effects have been broken into three main categories on page 3.6-19 (1) invasives, 2) loss of pollinators, and 3) fugitive dust). Therefore, we recommend removing “indirect” impacts from the discussion on page 3.6-18.	The text has been updated as requested in Sections 3.6.6, 3.6.6.1 and 3.6.6.2.
U.S. Fish and Wildlife Service	556-1022	Page 3.6-20; Section 3.6.6.1 The Service supports the measures included in SS-1 to avoid and minimize impacts to federally listed plants. SS-1 states that “(Species-specific Surveys for Federally-listed Species) – Site- and species-specific surveys for federally listed plant species would be conducted prior to the BA to identify the precise location of known individuals and populations and ground-truth modeled habitats. Surveys would be conducted in areas identified as potential habitat through models developed for the EIS, or from agency provided models for specific species. Surveys would be conducted as described in the TWE Project Special Status Species Survey Plan and subsequent Survey Plan Memos. Species not requiring surveys prior to the BA would be identified by the USFWS and BLM. For these species, pre-construction surveys still would be required. If individuals or populations are identified during surveys in potential habitat areas, species-specific avoidance through structure and ROW design modifications would be developed and implemented. For species that cannot be avoided, species specific mitigation would need to be developed in consultation with the USFWS and BLM. Species-specific mitigation may include compensatory mitigation and transplanting of individuals.”	Thank you for your comment. Please note that mitigation measure SS-1 has been updated based on comments provided by the USFWS.
U.S. Fish and Wildlife Service	556-1023	Page 3.6-20; Section 3.6.6.1 We recommend an additional mitigation measure for federally proposed and listed plants: The site-specific design modifications proposed in SS-1 should be provided to the USFWS in the Biological Assessment to demonstrate where and how the company will achieve avoidance and minimization.	Mitigation measure SS-1 has been updated to state, “For federally listed species, the species-specific mitigation would be identified as conservation measures in the Biological Assessment”
U.S. Fish and Wildlife Service	556-1024	Page 3.6-20; Section 3.6.6.1For SS-1, recommend that this measure be expanded to apply to species proposed for listing under ESA (e.g. Graham’s penstemon and White River penstemon).	SS-1 has been revised to allow BLM and Western the ability to identify sensitive species requiring survey.
U.S. Fish and Wildlife Service	556-1025	Page 3.6-20; Section 3.6.6.1 SS-1: Prior to the use of potential habitat models for federally listed or federally proposed species, recommend FWS review and approval of those models.	The mitigation measures have been updated to require agency approval of habitat models used.
U.S. Fish and Wildlife Service	556-1026	Page 3.6-20; Section 3.6.6.1 SS-4 Avoidance of Ute Ladies’-tresses Orchid Species and Habitat states that “Surface disturbance associated with facilities, access roads, and other Project-related construction activities would not occur within the areas identified as potential habitat or within a 50-foot buffer around known occurrences.” SS-6 states that “A minimum 300-foot buffer distance would be incorporated between federally listed individuals and populations and surface disturbance.” This appears to be a discrepancy. We recommend all surface disturbance (e.g., for towers, ground electrodes, roads) avoid all known Ute ladies-tresses’ individuals by 300 feet. We also recommend that areas of high occurrence potential (e.g., floodplain of Little Snake and Yampa Rivers in Colorado) also be avoided by 300 feet unless surveys demonstrate likely absence.	Proposed additional mitigation for Ute ladies’-tresses (identified as measure SS-2 in the FEIS) has been updated to require a minimum 300 ft buffer from Project-related surface disturbance. Species-specific surveys prescribed in mitigation measure SS-1 would demonstrate presence or absence of individuals or populations.
U.S. Fish and Wildlife Service	556-1027	Page 3.6-20 to 3.6-21, App C C-124; Section 3.6.6.1, Table C.5-1Measure SS-4 states that “(Avoidance of Ute Ladies’-tresses Orchid Species and Habitat) – Known individuals and populations and areas identified as potential habitat through consultation with the USFWS would be spanned by the transmission line. Surface disturbance associated with facilities, access roads, and other Project-related construction activities would not occur within the areas identified as potential habitat or within a 50-foot buffer around known occurrences. Presence of species in modeled habitat would be assumed for USFWS mitigation purposes. If potential habitat cannot be avoided, 2 years of surveys in potential habitat would be required, and USFWS formal consultation may be necessary.” The Service recommends instead of a 50-foot buffer around known occurrences, the BMP state that a buffer to-be-determined by experts on the species prior to project construction be utilized outside of the potential habitat surrounding known populations. For example, SS-6 states that “A minimum 300-foot buffer distance would be incorporated between federally listed individuals and populations and surface disturbance,” which provides much more protection for ULT than SS-4’s proposed 50-foot buffer.	The mitigation measures have been updated to have a consistent minimum 300 ft buffer for all federally listed species.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1028	Page 3.6-20; Section 3.6.6.1 SS-4: We recommend that you replace "50-foot buffer" with a "buffer to-be-determined by experts on the species prior to construction". A 50-foot buffer may not be sufficient to protect a riparian plant from upstream or downstream culvert construction or maintenance for example.	The mitigation measure has been updated to provide a consistent minimum 300-foot avoidance buffer.
U.S. Fish and Wildlife Service	556-1029	Page 3.6-20; Section 3.6.6.1 SS-4: Recommend that you replace "USFWS mitigation purposes" with "section 7 consultation".	The text has been updated as requested. DEIS mitigation measures SS-4 is now FEIS mitigation measure SS-2.
U.S. Fish and Wildlife Service	556-1030	Page 3.6-20; Section 3.6.6.1 SS-4: 1) Recommend that you replace "potential" habitat, with "suitable" habitat. Ultimately, TWE should conduct a ground-truthing exercise to narrow the potential habitat locations (especially for species like Ute ladies'-tresses because potential habitat is extensive). Because potential habitat can be extensive, it would be very difficult for TWE to demonstrate full avoidance as it wishes to do.	The text has been updated as requested. DEIS mitigation measure SS-4 is now FEIS mitigation measure SS-2.
U.S. Fish and Wildlife Service	556-1031	Page 3.6-20; Section 3.6.6.1 SS-5: For some T&E species, a 300-foot buffer will not provide adequate protection when construction occurs upslope of an individual or population. We recommend that you exclude T&E species from this measure OR disclose that a buffer for T&E species will be determined on a case-by-case basis with the FWS. Also, please be aware that for some T&E species (e.g. clay phacelia), we also recommend a buffer between surface disturbance and suitable habitat.	The 300-foot buffer is the minimum distance required but does not preclude additional distance. Additional buffer distances will be determined through Section 7 consultation and the development of the BA and BO.
U.S. Fish and Wildlife Service	556-1032	Page 3.6-21; Section 3.6.6.1 SS-6: For some T&E species, a 300-foot buffer will not provide an adequate buffer between individuals and construction. We recommend that you articulate that buffers for T&E species will be determined on a case by case basis with the FWS. Also, please be aware that for some T&E species (e.g. clay phacelia, we also recommend a buffer between surface disturbance and suitable habitat.	The 300 ft buffer is the minimum buffer required. Additional buffers would be determined during Section 7 consultation and the development of the BA and BO.
U.S. Fish and Wildlife Service	556-1033	Page 3.6-22; Section 3.6.6.2 Recommend that you add herbicide application and drift as a direct impact that may result in degradation/loss of individual or local populations; Recommend that you add herbicide application and drift as an indirect impact that may result in loss of pollinators.	Herbicide application has been added as an indirect impact that may result in loss of pollinators.
U.S. Fish and Wildlife Service	556-1034	Page 3.6-23; Section 3.6.6.2 ICF International, under a contract with Wyoming Infrastructure Authority, published the "Framework for Analyzing Separation Distances between Transmission Lines in Wyoming: Final Report" (August 26, 2009). The Report recommends a minimum line separation distance for new transmission lines of 260 feet to 1,500 feet. We recommend that TWE include the following measure as a Design Feature: "Where potentially suitable habitat and known occurrences of T&E plant species exist, TWE will coordinate with Rocky Mountain Power to minimize separation distance between the TWE transmission line and the RMP Energy Gateway South transmission line (below 1500 feet). We further recommend that TWE disclose the results of its minimum line separation distance analysis for T&E plant species in the Biological Assessment for section 7 consultation.	Chapter 2 of the Final EIS describes the updated separation criteria considered in the Final EIS, which is a general minimum offset of 250 feet from existing transmission lines (decreased from a general 1,500 feet with 250 feet only considered in locations with specific resource or management constraints in the Draft EIS). TransWest and the Energy Gateway South proponents are collaborating to develop collocated routing for the projects considering 250 feet general minimum offsets to the maximum extent possible while minimizing impacts to suitable habitat for T&E plant species. This collaboration will be done within the TransWest analyses corridors disclosed in the Draft and Final EISs.
U.S. Fish and Wildlife Service	556-1035	Page 3.6-24; Section 3.6.6.3 The DEIS states that Alternative I-A's effects to Ute ladies'-tresses would be avoided through the implementation of mitigation measure SS-2. However, SS-2 deals with USFS species. Therefore, we recommend that the DEIS instead state that SS-1, SS-4, and SS-6 would be implemented to avoid and minimize affects to potential habitat for this species.	The text has been updated with the appropriate mitigation for the Ute ladies'-tresses orchid.
U.S. Fish and Wildlife Service	556-1037	Page 3.6-31; Section 3.6.6.4 Table 3.6-11: Recommend that you add a Parameter such as: Acreage of Graham's penstemon proposed critical habitat impacted (Alternatives II-D and II-F cross proposed critical habitat for this species).	The requested parameter has been added.
U.S. Fish and Wildlife Service	556-1038	Page 3.6-33; Section 3.6.6.4 To minimize the loss of habitat for Deseret milkvetch, we recommend that TWE work pro-actively with Rocky Mountain Power (Energy Gateway South transmission line) to minimize separation distance between the TWE transmission line and the RMP Energy Gateway South transmission line (< 1500 feet). ICF International, under a contract with Wyoming Infrastructure Authority, published the "Framework for Analyzing Separation Distances between Transmission Lines in Wyoming: Final Report" (August 26, 2009). The Report recommended a minimum line separation distance for new transmission lines of 260 feet to 1,500 feet.	Chapter 2 describes the updated separation criteria considered in the Final EIS, which is a general minimum offset of 250 feet from existing transmission lines (decreased from a general 1,500 feet with 250 feet only considered in locations with specific resource or management constraints in the Draft EIS). TransWest and the Energy Gateway South proponents are collaborating to develop collocated routing for the projects considering 250 feet general minimum offsets to the maximum extent possible while still addressing resource concerns. This collaboration will be accomplished within the TransWest EIS analyses corridors.
U.S. Fish and Wildlife Service	556-1039	Page 3.6-33; Section 3.6.6.4 SS-8 conflicts with SS-5 and SS-6 (all reflect proposed buffers for Deseret milkvetch). Recommend that it is made clear which measure trumps the rest. We wish to avoid confusion when these measures are communicated and implemented by crews on the ground.	The three mitigation measure have been updated to clarify how the measures should work together. Note that DEIS mitigation measures SS-5, SS-6 and SS-8 are now FEIS mitigation measures SS-3, SS-4, and SS-7, respectively.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1040	Page 3.6-38; Section 3.6.6.4 The impact analysis for clay phacelia under Alternative II-A does not seem accurate. We do not believe that there are relocation sites within the corridor for Alt II-A. We also disagree that the limited range for the species is located predominantly within the 2-mile corridor for Alt II-A. In addition, although there is modeled potential habitat within the 2-mile corridor for Alt II-A, there are no documented occurrences.	The impact analysis for clay phacelia under Alternative II-A has been verified and updated as appropriate.
U.S. Fish and Wildlife Service	556-1041	Page 3.6-38; Section 3.6.6.4 SS-9: The Utah Field Office FWS has developed a list of conservation measures for clay phacelia (Attachment 1 at the end of this table). We recommend that TWE follow these measures to avoid impacts to clay phacelia. We specifically recommend that you substitute the existing text in SS-9 with these conservation measures.	The list of conservation measures will be included in the development of the Biological Assessment.
U.S. Fish and Wildlife Service	556-1042	Page 3.6-38; Section 3.6.6.4 This page references the application of SS-3. Based on the definition of SS-3, it does not apply to Federally listed species. Recommend removing the reference to SS-3.	All mitigation measures have been updated and re-numbered for the FEIS and the text updated in all sections to reference the appropriate mitigation measure.
U.S. Fish and Wildlife Service	556-1043	Page 3.6-38; Section 3.6.6.4 3rd paragraph on this page: It is not clear which species this paragraph is referencing; please clarify.	The text has been clarified in Section 3.6.6.4.
U.S. Fish and Wildlife Service	556-1044	Page 3.6 -38,55,58; Section 3.6.6.4 The impact analysis for clay phacelia, under Alternatives II-A, II-E and II-F, should be expanded. We specifically recommend that you discuss the impact of the proposed line to potential habitat in more detail. The ability to recover the species through reintroduction becomes more limited as potential habitat is lost. This point should be disclosed in the text.	The text has been updated as requested in the Alternative II-A discussion within Section 3.6.6.4.
U.S. Fish and Wildlife Service	556-1045	Page 3.6-39; Section 3.6.6.4 We do not agree that implementation of SS-6 and SS-9 will prevent direct and indirect impacts to clay phacelia. We recommend that TWE adopt the conservation measures developed by the Utah Field Office FWS (Attachment 1 at the end of this table).	The conservation measures will be included as part of the Biological Assessment. The text will be updated in Section 3.6.6.4 to reflect USFWS concerns.
U.S. Fish and Wildlife Service	556-1046	Page 3.6-58; Section 3.6.6.4 We recommend a separate impact analysis for clay phacelia under Alternative II-F (preferred alternative). The impacts under this Alternative are very different than those under Alternatives II-A and II-E, which are referenced in this section as having similar impacts.	The impact analysis for each alternative have been completed separately. The text discussing the results for Alternative II-A has been updated.
U.S. Fish and Wildlife Service	556-1047	Page 3.6-58; Section 3.6.6.4 The Forest Service developed a potential habitat model for clay phacelia (July 2013) that was approved by the Utah Field Office FWS. We recommend that you use this model in your impact analysis as it appears it encompasses less acreage than the model AECOM developed and will likely be more precise. Alternatively, please be aware that you should use the July 2013 clay phacelia potential habitat model for your ESA section 7 biological analysis.	The approved USFS clay phacelia model has been incorporated into the FEIS analysis.
U.S. Fish and Wildlife Service	556-1048	Page 3.6-59; Section 3.6.6.4 As of August 6, 2013, the Service has proposed critical habitat for Graham's penstemon (78 FR 47831-47858). We recommend that you disclose this information, as well as the acreage of proposed critical habitat impacted by Alt II-F, and the others that cross it.	The proposed critical habitat for the Graham's penstemon referred to above has been included in the FEIS analysis.
U.S. Fish and Wildlife Service	556-1049	Page 3.6-59; Section 3.6.6.4 Recommend that you provide additional impact analysis for Graham's penstemon. The existing text discloses the acreage of potential habitat crossed by the project and the avoidance/minimization measures proposed by the applicant. We are interested to see an analysis for the various ways in which the project will directly and indirectly affect the plant and its habitat.	The change in status, and critical habitat recently designated for the species, will be included in the impact analysis for the FEIS in Section 3.6.
U.S. Fish and Wildlife Service	556-1050	Page 3.6-59; Section 3.6.6.4 As of August 6, 2013, the Service has proposed critical habitat for White River penstemon (78 FR 47831-47858). We recommend that you disclose this information, as well as the acreage of critical habitat impacted by Alt II-F, and the other Alternatives that cross it.	The critical habitat for the White River penstemon has been included in the FEIS as part of the impact analysis.
U.S. Fish and Wildlife Service	556-1051	Page 3.7; Section General The DEIS does not appear to detail what wildlife surveys were conducted pre-construction for this project. All such surveys should be presented in the DEIS including what types of surveys were done and a summary of results of such surveys. If this cannot be provided in the DEIS now, we recommend that the EIS at least provide details on all the types of wildlife surveys the company has committed to doing.	Comment noted. Details regarding applicant committed and agency required resource surveys are in development alongside the FEIS. Final determinations regarding potential surveys will be included in the Project ROD and Final POD.
U.S. Fish and Wildlife Service	556-1053	Page 3.7-1; Section Table 3.7-1 The Service recommends including BLM's WO IM-2010-156 in Table 3.7-1 as it describes addressing eagles and migratory birds in NEPA for renewable energy projects.	Text in Section 3.7 has been modified to address comment.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1054	Page 3.7-2; Section 3.7.3 Use of hydrologic units/watersheds as an analytic unit for all wildlife species is problematic. For many wildlife species watershed unit boundaries are not important in terms of defining life history and the use of habitats and landscapes to meet life requirements.	The general wildlife analysis area does not apply to all wildlife species as the comment suggests. Big game, USFS MIS species, and special status species discussed in section 3.8 utilize either species or species guild-specific spatial analysis units. The lead agencies have determined that development of individual species analysis areas for non-special status species would be outside of the scope of this document. No change to FEIS text.
U.S. Fish and Wildlife Service	556-1055	Page 3.7-2 to 3.7-3; Section Table 3.7-2 Footnote #1 states that "The wildlife analysis area includes suitable habitat within the HUC 10 watersheds crossed by the Project." However, it appears that all habitat types are included in Table 3.7-2, but no description of what is considered "suitable habitat" is provided. The Service requests clarification.	Comment noted. Suitable habitat descriptions are provided by species or species guild in the individual discussions throughout section 3.7.4.
U.S. Fish and Wildlife Service	556-1056	Page 3.7-3; Section 3.7.4 Developed/disturbed land is less important for wildlife in general than intact native habitats. However, many wildlife species use developed/disturbed land and some even occur in these habitats in large numbers, as some of these lands provide important food and cover for some wildlife species.	Comment noted. Tables and text of Sections 3.7 and 3.8 have been updated to disclose that although the developed/disturbed land cover type is not considered to be suitable habitat for most native wildlife species and is not included in habitat impact analyses and reported disturbance acreages, some wildlife species may use this land cover type.
U.S. Fish and Wildlife Service	556-1057	Page 3.7-6 to 3.7-8; Section 3.7.4.2 Consider adding population trend data for at least the last 5 years for all migratory bird species described in this section. Under "Waterfowl" header on page 3.7-7 sandhill crane is listed under waterfowl when this species is not considered a waterfowl species.	Text in Section 3.7.4.2 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1058	Page 3.7-8; Section 3.7.4.3 The Service acknowledges the discussion of the MOUs between the Service and the FS and BLM regarding protections for migratory birds, specifically that the DEIS states that "In order to comply with all applicable regulatory requirements outlined by the EO 13186 and the associated MOUs, TWE has committed to developing an operational policy and a comprehensive strategy for collecting data, minimizing impacts, and mitigating loss of migratory birds and essential habitats prior to the initiation of construction. This policy and strategy will be incorporated into a single, over-arching document (Avian Protection Plan or Bird Conservation Strategy) that will include a full listing of all minimization measures included in this EIS, as well as recommendations from the USFWS and additional information included within the Avian Protection Plan Guidelines, developed by the USFWS and APLIC in 2005 (APLIC 2012)." The Service looks forward to working with the applicant and BLM in developing a Bird Conservation Strategy that includes avoidance, minimization, and restoration measures for the length of the project, as well as compensatory mitigation for loss of migratory bird habitats as a result of the Project. The Service would like to remind TWE that "migratory birds" includes all raptors, including eagles.	Thank you for your comment. TransWest has committed to preparation of an Avian Protection Plan (APP) should the Project be approved. The APP would be prepared in collaboration with the USFWS and lead agencies in accordance with the APP guidelines developed by APLIC and the USFWS in 2005 (APLIC 2012). Bird species receiving protection under the MBTA have been clarified in Section 3.7.1 of the Final EIS.
U.S. Fish and Wildlife Service	556-1059	Page 3.7-8 to 3.7-11; Section 3.7.4.3 Under the Raptors and Other Migratory Birds header in opening discussion, the MBTA and E.O. 13186 discussions are mixed together. MBTA is a Federal law whereas E.O. 13186 is not a Federal law and generally only provides recommendations for how Federal agencies should work together to conserve populations of migratory birds. E.O. 13186 should be discussed separately under its own header.	Text in Section 3.7.4.3 has been modified to address this comment.
U.S. Fish and Wildlife Service	556-1059a	Also in this section there is a statement that TWE has committed to developing an operational policy and comprehensive strategy for migratory birds and that a single over-arching APP or BCS would be developed. This strategy and all migratory bird conservation measures should be presented in the DEIS so USFWS could review this and provide feedback and comments on it now.	The Applicant has committed to developing an Avian Protection Plan (APP) for the project, which will be part of the Construction, Operation and Maintenance (COM) Plan. If the project is approved, the APP would be prepared after the ROD, during preparation of the Notice to Proceed Plan of Development. For the FEIS, the analysis of impacts to migratory birds and associated impact avoidance and minimization measures have been augmented from what was presented in the DEIS.
U.S. Fish and Wildlife Service	556-1061	Page 3.7-9; Section 3.7.4.3 USFWS Birds of Conservation Concern- The DEIS should present a list of all USFWS BCC species known to occur, or likely to occur in the project area.	Appendix G-4 has been developed to address BCC and PIF Priority Species known or with potential to occur the wildlife analysis area. Impacts to potential habitat for these species will be presented using the "crosswalk" habitat association approach as is used for BLM-listed sensitive species in Chapter 3.8.
U.S. Fish and Wildlife Service	556-1061a	The second paragraph in this section deals with BCR's which were not developed by USFWS (BCR's should be discussed under a unique header).	Text in Section 3.7 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1062	Page 3.7-9 to 3.7-10; Section 3.7.4.3 Partners in Flight Priority Bird Species- The PIF North American Land Bird Conservation Plan should be referenced under this header. Similarly the North American Waterfowl Management Plan, the North American Waterbird Conservation Plan, and the U.S. Shorebird Conservation Plan should all be referenced in appropriate sections of the DEIS.	Text in Section 3.7.4.3 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1063	Page 3.7-10; Section 3.7.4.3 Figure 3.7-1: Recommend identifying the agency preferred alternative on this Figure.	The Agency Preferred Alternative has been added to the figure.
U.S. Fish and Wildlife Service	556-1064	Page 3.7-12; Section 3.7.4.3 Figure 3.7-2: Recommend identifying the agency preferred alternative on this Figure.	The Agency Preferred Alternative has been added to this figure.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1065	Page 3.7-36 and 37; Section 3.7.6 and Table 3.7-19 The Service acknowledges the description of potential direct and indirect impacts that the Project design and construction will have on wildlife, and that not only direct mortality is considered as potential impact on wildlife, but also habitat loss and fragmentation, displacement of individuals, loss of breeding success, exposure to noise and human activity, and increased predation. We recommend that the EIS include a detailed discussion of the potential direct and indirect impacts the Project operations and maintenance will have as well.	Comment noted. Section 3.7.6 has been revised to address comment.
U.S. Fish and Wildlife Service	556-1066	Page 3.7-36 to 3.7-107; Section 3.7.6 Impacts to Wildlife- This section should be revised. We recommend that there first be a more detailed overview of all direct and indirect impacts associated with the project that will, or are likely to, occur as a result of constructing this Project. With this approach the Region and subalternative discussions later in the Impacts section can be shortened and reduced in size and scope. In this version these latter discussions are largely repetitive. This impact overview should be comprehensive of the total footprint of the Project including the transmission line, roads, substations, staging areas, equipment yards, construction camps, etc. Impacts should also include all those associated with construction and operation and maintenance over the life of the project. Impacts associated with transmission lines include direct loss of wildlife due to collisions with motor vehicles, crushing of burrows or nests, and direct loss of wildlife habitat and fragmentation of habitat. Transmission lines also create a risk for electrocution and collision for wildlife. Other impacts include: species displacement, barrier effects, increased predation rates, creation of mammalian predator travel lanes, increased nest parasitism, invasive plant species, increased wildland fire risk, lower wildlife density, increase in trash/human waste, and increase in off road vehicle traffic (quads, dirt bikes, etc.). Power lines also provide perches and nest sites for raptors and ravens and will likely result in higher population levels for some raptors and ravens with subsequent impacts to greater sage-grouse and other ground nesting/dwelling wildlife species. Management of the transmission corridor post-construction will have other ongoing impacts to wildlife including motor vehicle and helicopter traffic for inspections and maintenance. Use of herbicides to control vegetation and cutting of woody vegetation to prevent contact with lines will impact wildlife and their habitat. Lastly in terms of many of the impacts associated with transmission line construction the effects of the impact extend beyond the immediate 250 foot ROW corridor (e. g. fragmentation, barrier effects, increase predation on ground nesting birds, etc.) and this should be acknowledged in the EIS.	Comment noted. Section 3.7.6 has been revised to address comment.
U.S. Fish and Wildlife Service	556-1067	Page 3.7-36; Section 3.7.6 Table 3.7-19: Recommend that the first Resource Topic in Table 3.7-19 be revised as follows: Habitat loss, alteration, degradation, and fragmentation.	Relevant text in Sections 3.7 and 3.8 have been modified to address comment.
U.S. Fish and Wildlife Service	556-1068	Page 3.7-36; Section 3.7.6 Table 3.7-19: To address habitat alteration and degradation resulting from project construction and operation, recommend adding the following as an Analysis Consideration: The acreage of habitat that will be converted (altered) from one habitat type (i.e. conifer forested, forb/grass understory) to another habitat type (i.e. no canopy, shrub understory). For migratory birds, this will assist in the analysis of project impacts and development of compensatory mitigation under TWE's proposed Bird Conservation Strategy.	The information requested is presented in Section 3.5.6 Impacts to Vegetation Resources. No change to text.
U.S. Fish and Wildlife Service	556-1069	Page 3.7-36; Section 3.7.6 Table 3.7-19: Recommend that under the second resource topic, Loss of or injury to a species, you add the following Analysis Consideration: Destruction of nests, eggs, and hatchlings from vegetation clearing activities	Text in the referenced table has been modified to address comment.
U.S. Fish and Wildlife Service	556-1070	Page 3.7-36; Section 3.7.6 Table 3.7-19: Recommend that under the second resource topic, Loss of or injury to a species, you add the following Analysis Consideration: Electrocution of birds	Text in the referenced table has been modified to address comment.
U.S. Fish and Wildlife Service	556-1071	Page 3.7-37; Section 3.7.6 The introductory sentence to WLF-1 on this page is: "In addition the following mitigation measure for wildlife should be implemented". Recommend that the text specifically state whether the measure will be followed.	Text in Section 3.7.6 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1072	Page 3.7-37 and else- where. C.5 C-125; Section 3.7.6 and else- where, Table C.5-1 WLF-1 states that TWE will avoid habitat removal for migratory birds in currently undisturbed lands. This avoidance measure does not define "currently undisturbed," and implies that migratory bird habitat in disturbed areas will be removed during nesting season. Please clarify.	Comment noted. The language of WLF-1 has been updated to provide clear protections to nesting migratory birds and clarified in that it applies to all lands crossed by the project. The clause, "on currently undisturbed lands" has been removed from the measure. A new mitigation measure, WLF-2, has been added to provide similar protections for nesting raptors.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1073	Page 3.7-46; Section 3.7.6 WLF-1 does not provide meaningful assurance that raptors or migratory birds will be protected. Use of the clauses, "on currently undisturbed lands" and "to the extent possible" significantly lessens the effectiveness of the measure. Ultimately, WLF-1 does not reflect the commitment from BLM to promote the conservation of bird populations under E.O. 13186.	Comment noted. The language of WLF-1 has been updated to provide clear protections to nesting migratory birds and raptors. The clauses, "on currently undisturbed lands" and "to the extent possible" have been removed from the measure.
U.S. Fish and Wildlife Service	556-1074	Page 3.7-40; Section 3.7.6.1 The Service acknowledges that "A comprehensive raptor nest survey would be conducted along the agency preferred route prior to construction. This would provide the data needed to inform micro-siting adjustments and timing of construction activities to avoid or minimize impacts to nesting raptors."	Thank you for your comment.
U.S. Fish and Wildlife Service	556-1075	Page 3.7-44; Section 3.7.6.2 The Service acknowledges the discussion of potential direct and indirect impacts to wildlife as a result of the Project.	Thank you for your comment.
U.S. Fish and Wildlife Service	556-1076	Page 3.7-46; Section 3.7.6.2 Within the Project in Utah, we recommend use of the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances which were developed in part to provide consistent application of raptor protection measures statewide and provide full compliance with environmental laws regarding raptor protection. Raptor survey and mitigation measures are provided in the Raptor Guidelines as recommendations to ensure that proposed projects will avoid adverse impacts to raptors. For WLF-1, please add language that references intent to comply with the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances (Romin and Muck, 2002). This is a comment we provided during review of PDEIS2.	Comment noted. This information has been incorporated into the discussion of raptor nest protections in sections 3.7.4.3 and 3.8.4.2. Additional mitigation for nesting raptors, proposed measure WLF-2, has been included in the Final EIS.
U.S. Fish and Wildlife Service	556-1077	Page 3.7-46; Section 3.7.6.2 The Service recommends providing a more detailed discussion of potential direct and indirect impacts to raptors and other migratory birds as a result of the Project. Please note that while some raptor species "are not classified as special status," they are still protected species under the Migratory Bird Treaty Act.	Thank you for your comment. The migratory bird portions of FEIS sections 3.7 and 3.8 have been revised and augmented to address this comment.
U.S. Fish and Wildlife Service	556-1078	Page 3.7-46; Section 3.7.6.2 In the second sentence of the second paragraph under Raptors and Other Migratory Birds, the text reads "The availability of aptor nest data." Please correct this misspelling.	Text in Section 3.7 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1079	Page 3.7-47; Section 3.7.6.2 The Service acknowledges that "TWE has committed to developing an operational policy and a comprehensive strategy for collecting data, minimizing impacts, and mitigating loss of migratory birds and essential habitats prior to the initiation of construction. This policy and strategy will be incorporated into a single, over-arching document (Avian Protection Plan or Bird Conservation Strategy) that will include a full listing of all minimization measures included in this analysis, as well as recommendations from the USFWS and additional information included within the Avian Protection Plan Guidelines, developed by the USFWS and APLIC in 2005 (APLIC 2012)." The Service anticipates working with the applicant and BLM in developing a plan or strategy that addresses the Project's effects, avoidance, minimization, and mitigation for migratory birds and their habitats.	Comment noted. The lead agencies and TransWest will continue to coordinate with the USFWS to promote avian conservation. No change to text.
U.S. Fish and Wildlife Service	556-1080	Page 3.7-47; Section 3.7.6.2 TWE-32 is referenced on this page as a measure that will be applied by TWE to minimize and reduce impacts during the breeding season. Based on the text in Appendix C for TWE-32, we do not agree that application of the measure will reduce impacts to raptors and migratory birds during the breeding season. There is no language in this measure that is binding or descriptive enough to assure the applicant will protect raptors or migratory birds during the breeding season. Recommend either deleting this measure, or state that it is binding and enhance the description. This is a comment we provided during review of PDEIS2.	Recommendations for revision of TWE-32 have been forwarded to the applicant for consideration. The language of other applicable mitigation measures, such as WLF-1, has been revised in the FEIS to provide a higher level of migratory bird protection.
U.S. Fish and Wildlife Service	556-1081	Page 3.7-47; Section 3.7.6.2 The Migratory Bird Treaty Act (MBTA) prohibits the take of migratory birds, their parts, nests, eggs, and nestlings. Executive Order 13186, issued on January 11, 2001, affirmed the responsibilities of Federal agencies to comply with the MBTA. To ensure construction activities do not result in the "take" of an active nest or migratory bird protected under the MBTA, we recommend that TWE implement measures to avoid vegetation clearing and surface disturbance within critical breeding, nesting, and fledging seasons. We specifically recommend:	Comment noted. Per applicant-committed measure TWE-32, TransWest has committed to comply with seasonal and spatial avoidance buffers to mitigate impacts to wildlife, including birds. Avian nesting seasons and spatial buffers are presented in Section 3.7.4.3 of the Final EIS. Proposed mitigation measures WLF-1 and WLF-2 address potential impacts to breeding raptors and other migratory birds through conducting pre-construction surveys during the nesting season and avoiding activities that could potentially result in adverse impacts to nesting birds. Details regarding the entire suite of avian conservation measures would be provided in the TWE APP prepared by TransWest in collaboration with the USFWS.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1082	Page 3.77-47 ; Section 3.7.6.2 a. Any ground-disturbing activities or vegetation treatments should be performed before migratory birds begin nesting or after all young have fledged to avoid unintentional take;	Comment noted. Per applicant-committed measure TWE-32, TransWest has committed to comply with seasonal and spatial avoidance buffers to mitigate impacts to wildlife, including birds. Avian nesting seasons and spatial buffers are presented in Section 3.7.4.3 of the Final EIS. Proposed mitigation measures WLF-1 and WLF-2 address potential impacts to breeding raptors and other migratory birds through conducting pre-construction surveys during the nesting season and avoiding activities that could potentially result in adverse impacts to nesting birds. Details regarding the entire suite of avian conservation measures would be provided in the TWE APP prepared by TransWest in collaboration with the USFWS.
U.S. Fish and Wildlife Service	556-1083	Page 3.7-47; Section 3.7.6.2 b. If activities must be scheduled to start during the migratory bird breeding season, take appropriate steps to prevent migratory birds from establishing nests in the potential impact area. These steps could include covering equipment and structures and use of various excluders (e.g., noise). Prior to nesting, birds can be harassed to prevent them from nesting on the site.	Comment noted. Per applicant-committed measure TWE-32, TransWest has committed to comply with seasonal and spatial avoidance buffers to mitigate impacts to wildlife, including birds. Avian nesting seasons and spatial buffers are presented in Section 3.7.4.3 of the Final EIS. Proposed mitigation measures WLF-1 and WLF-2 address potential impacts to breeding raptors and other migratory birds through conducting pre-construction surveys during the nesting season and avoiding activities that could potentially result in adverse impacts to nesting birds. Details regarding the entire suite of avian conservation measures would be provided in the TWE APP prepared by TransWest in collaboration with the USFWS.
U.S. Fish and Wildlife Service	556-1084	Page 3.7-47; Section 3.7.6.2 c. If activities must be scheduled during the migratory bird breeding season, a site-specific survey for nesting birds should be performed starting at least two weeks prior to groundbreaking activities or vegetation treatments. Established nests with eggs or young should not be moved, and the birds should not be harassed (see b., above), until all young have fledged and are capable of leaving the nest site;	Comment noted. Per applicant-committed measure TWE-32, TransWest has committed to comply with seasonal and spatial avoidance buffers to mitigate impacts to wildlife, including birds. Avian nesting seasons and spatial buffers are presented in Section 3.7.4.3 of the Final EIS. Proposed mitigation measures WLF-1 and WLF-2 address potential impacts to breeding raptors and other migratory birds through conducting pre-construction surveys during the nesting season and avoiding activities that could potentially result in adverse impacts to nesting birds. Details regarding the entire suite of avian conservation measures would be provided in the TWE APP prepared by TransWest in collaboration with the USFWS.
U.S. Fish and Wildlife Service	556-1085	Page 3.7-47; Section 3.7.6.2 d. If nesting birds are found during the survey, appropriate spatial buffers should be established around nests. Vegetation treatments or ground-disturbing activities within the buffer areas should be postponed until the birds have left the nest. Confirmation that all young have fledged should be made by a qualified biologist.	Comment noted. Per applicant-committed measure TWE-32, TransWest has committed to comply with seasonal and spatial avoidance buffers to mitigate impacts to wildlife, including birds. Avian nesting seasons and spatial buffers are presented in Section 3.7.4.3 of the Final EIS. Proposed mitigation measures WLF-1 and WLF-2 address potential impacts to breeding raptors and other migratory birds through conducting pre-construction surveys during the nesting season and avoiding activities that could potentially result in adverse impacts to nesting birds. Details regarding the entire suite of avian conservation measures would be provided in the TWE APP prepared by TransWest in collaboration with the USFWS.
U.S. Fish and Wildlife Service	556-1086	Page 3.7-47; Section 3.7.6.2 During construction, monitor equipment daily and deter any nesting activity by preventing access (exclusion) and through hazing that does not cause harm to the bird. Do not haze or exclude access if the adult birds are tending eggs or young. Do not haze or exclude access for eagles and threatened or endangered species. Nests (e.g., raven) may be removed while being constructed but cannot be removed once eggs or young are present. Shooting, killing and capturing birds, moving and possession of nests, and other similar activities are not allowed unless permitted by the U.S. Fish and Wildlife Service.	Thank you for your comment. Implementation of proposed mitigation measures WLF-1 and WLF-2 would avoid or minimize impacts to nesting migratory birds including raptors. In addition, TransWest has committed to preparing an APP for the Project, if approved. It is expected that the APP, prepared in collaboration with the lead agencies and USFWS, would include a comprehensive list of avian impact avoidance and minimization measures applicable to both the construction and operation & maintenance phases of the Project.
U.S. Fish and Wildlife Service	556-1087	Page 3.7-47 to 48; Section 3.7.6.2 The Service acknowledges the discussion about the effects of human disturbance and noise on migratory birds.	Comment noted. No change to text.
U.S. Fish and Wildlife Service	556-1088	Page 3.7-49 to 50; Section 3.7.6.2 The Service acknowledges the discussion regarding potential impacts resulting from collision and electrocution from transmission structures, lines, and guy wires. Following APLIC's Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 is helpful guidance. We additionally recommend that the Project follow Reducing Avian Collisions with Power Lines: State of the Art in 2012 (updated from 2005).	Additional mitigation requiring the applicant to construct the project in conformance with the APLIC 2012 has been included in the FEIS.
U.S. Fish and Wildlife Service	556-1089	Page 3.7-53; Section Table 3.7-23 The agency-preferred alternative (I-D) appears to have greater impacts on migratory birds (acres of construction, operation, and indirect impacts), raptor nests (nests within one mile of the reference line), and important bird areas (acres) than the other proposed alternatives. Based on this table, it does not appear that Alternative I-D would be the appropriate choice for avoiding impacts to these species. However, the survey effort regarding raptor nests relative to existing projects or ROWs potentially explains the higher number of raptor nests found within one mile of Alternative I-D. We recommend clarification about the values presented in Table 3.7-23 to better understand the difference between potential effects and survey effort.	Thank you for your comment. Please note that Alternative I-D is no longer the Agency Preferred Alternative in this region. For the Final EIS, the Region I Agency Preferred Alternative was redesignated to Alternative I-B. Decisions regarding designation of Agency Preferred Alternatives have been developed in consideration of impacts to multiple resources in addition to wildlife. Information regarding methodologies for calculating potential impact acreages is presented in Section 3.7.6.2 Impacts to Wildlife Common to All Alternative Routes and Associated Facilities. Raptor nest location data was compiled from multiple sources and the level of survey effort is not known for all sources. Consequently, as explained in Section 3.7.4.3, raptor nest data is not always a reliable indicator of raptor use in a given area. No change to text.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1090	Page 3.7-53; Section 3.7.6.3 We acknowledge that the DEIS includes acreage of BHCAs crossed by the 250 foot ROW for each alternative in Tables 3.7-23, 3.7-29, 3.7-39 and 3.7-42. We recommend that you also include the acreage of BHCAs crossed by the 2-mile corridor for each alternative. These acreages should also be discussed in the text. The 2-mile corridor will be crisscrossed by access roads. As stated on page 3.7-47, noise levels associated with construction may impact migratory bird species that occupy habitats in the 2-mile transmission line corridor. In addition, migratory bird habitat may be degraded, fragmented and eliminated due to the construction of new access roads and the widening of existing access roads. Additional impacts include destruction of nests/eggs during road construction and injury/mortality from collisions with vehicles.	Text and Tables in Section 3.7 have been modified to address comment.
U.S. Fish and Wildlife Service	556-1091	Page 3.7-55 thru 3.7-106; Section 3.7.6 The impact analysis provided for each alternative does not incorporate the acres of BHCAs impacted by the alternative. According to Table 3.7-19, this should be part of the analysis. Recommend adding the acreage of BHCAs crossed/disturbed for all alternatives.	Although impacts to BHCAs were incorporated for each alternative in the DEIS, additional detail has been provided. Impact tables in Section 3.7 have been modified to disclose construction, operation, and indirect impacts to BHCAs.
U.S. Fish and Wildlife Service	556-1092	Page 3.7-55 and 3.7-80; Section 3.7.6 For Alt-IA, the text presents acreage of habitat "lost" for raptors and other migratory birds. For Alt-II-F, the text presents acreage of habitat "disturbed" for raptors and other migratory birds. Recommend using consistent language to describe what is presented across alternatives.	Text in Section 3.7 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1093	Page 3.7-67; Section 3.7.6.4 Table 3.7-29: The Table does not seem to accurately represent the BHCA acreage crossed by Alternative II-F. Specifically, Alternative II-F crosses at least a few BHCAs, including the Green River BHCA, the Delta BHCA, and the Nebo BHCA, yet the Table does not reflect this.	Section 3.7 text and the referenced table have been modified with updated acreages.
U.S. Fish and Wildlife Service	556-1094	Page 3.7-107 and 3.8-152; Section 3.7.6.7, 3.7.6.10, 3.8.6.9, The DEIS states that "It is anticipated that reclamation efforts would be successful and no residual impacts to habitats will occur." The Service requests a more thorough explanation of reclamation efforts, particularly given historical transmission projects have not been fully reclaimed and have instead been restrung or rebuilt. Even short-term use of habitat for the construction of the Project could result in long-term loss of habitat services. The Service believes that residual effects will likely occur as a result of the Project. An explicit commitment should be made not only to "reclaim" any disturbance, but also to "restore" these areas back to native vegetation communities: this commitment should include a monitoring plan with clearly articulated objectives to ensure restoration success. It should be acknowledged in the EIS that not all restoration efforts are likely to succeed given the arid habitat types in the intermountain west.	Interim (post-construction) and long-term (post-decommissioning) reclamation are described in Appendix D, the Project Description Technical Report. Reclamation and restoration (including revegetation) would be completed in accordance with land management agency requirements as specified in the ROD. It may not be possible to restore native vegetation on certain soil types. The text of the EIS has been revised to better reflect this uncertainty.
U.S. Fish and Wildlife Service	556-1095	Page 3.8-1 to 3.8-21; Section 3.8 The background information (Affected Environment) part of this chapter should include basic information about habitat and population levels (at least 5 year trends) for the species included in this section to the degree it exists. This information will then serve as a basis for assessing impacts to these species from the Project.	Comment noted. Information regarding habitat requirements for each species is provided in DEIS section 3.8.4.1 Federally Listed and Candidate Species (DEIS pages 3.8-10 to 3.8-21). Information regarding population trends has been incorporated by reference to USFWS Recovery Plans and 5-year status reviews in the same section of the EIS and, to the extent available, will be included in the BA.
U.S. Fish and Wildlife Service	556-1095A	We recommend that background information and impacts discussions be in separate EIS chapters. For impacts discussion as with the recommendation for Wildlife chapter above, there should be a more detailed overview of potential impacts to Special Status Wildlife Species first, with less repetitive discussion later for the specific Regions and subalternatives.	The BLM NEPA Handbook provides a suggested format for an EIS that includes separate Affected Environment and Environmental Consequence chapters; however, it also allows that the specific EIS elements and their order should remain flexible and that in some instances it may be desirable to combine Chapters 3 and 4 into one chapter. The combined chapter is the BLM and Western's preferred format for this EIS, and because it is consistent with the format of other recently released and soon-to-be released interstate transmission line EISs. The impacts section for Special Status Wildlife Species has been updated to provide additional detailed analysis based on public and agency input on the Draft EIS. FEIS text has been modified to address comment.
U.S. Fish and Wildlife Service	556-1096	Page 3.8-4; Section 3.8.3 For SWFL – edit "Hooter-Parker" to Hoover-Parker.	FEIS text has been modified to address comment.
U.S. Fish and Wildlife Service	556-1097	Page 3.8-10/11; Section 3.8.4.1 Please include an assessment of potential impacts to desert tortoise critical.	Thank you for your comment. Impacts to desert tortoise critical habitat are discussed on DEIS pages 3.8-117, 3.8-118 (DEIS Table 3.8-43), 3.8-123, 3.8-140 (DEIS Table 3.8-54), and 3.8-151 (DEIS Table 3.8-58).
U.S. Fish and Wildlife Service	556-1098	Page 3.8-12 to 3.8-13; Section 3.8.4.1 The Service acknowledges the discussion regarding the current status of the greater sage-grouse. The DEIS points to BLM IM 2010 [2012]-043, which includes various conservation policies and procedures that BLM is directed to apply to the Project, including "In cooperation with respective state wildlife agencies, determine that the proposed ROW would cumulatively maintain or enhance greater sage-grouse habitat." The Service believes that the installation of a transmission line via a right-of-way grant from the BLM is not likely to maintain or enhance greater sage-grouse habitat. Because the Project is likely to destroy and degrade greater sage-grouse habitat, a compensatory mitigation plan should be developed for this Project.	Comment noted. Information regarding the TransWest's commitment to prepare a compensatory mitigation plan as part of the greater sage-grouse Habitat Equivalency Analysis is provided in DEIS Section 3.8.6.4 Region 1 (page 3.8-60).

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U.S. Fish and Wildlife Service	556-1099	Page 3.8-13; Section 3.8.4.1 There may be a typo on this page. The first reference to BLM lms on this page (mistakenly?) identifies IM 2012-043 as IM 2010-043.	FEIS text has been modified to address comment.
U.S. Fish and Wildlife Service	556-1100	Page 3.8-13; Section 3.8.4.1 In the section on this page entitled "Lekking, breeding, nesting habitat", we recommend that you reference the following literature which establishes that most (74-80%) hens nest within 4 miles of a lek: 1) Moynahan B. J. 2004. Landscape-scale factors affecting population dynamics of greater sage-grouse (<i>Centrocercus urophasianus</i>) in north central Montana, 2001-2004. Dissertation, The University of Montana, Missoula; and, 2) Holloran, M. J. and S. H. Anderson. 2005. Spatial distribution of greater sage-grouse nests in relatively contiguous sagebrush habitats. Condor 107: 742-752. This literature forms the basis for our recommendations regarding spatial and temporal buffers for lekking and nesting greater sage-grouse.	FEIS Section 3.8.4.1 has been updated to address comment.
U.S. Fish and Wildlife Service	556-1101	Page 3.8-12 to 3.8-13; Section 3.8.4.1 The Service acknowledges the discussion regarding the current status of the greater sage-grouse. The DEIS points to BLM IM 2010 [2012]-043, which includes various conservation policies and procedures that BLM is directed to apply to the Project, including "In cooperation with respective state wildlife agencies, determine that the proposed ROW would cumulatively maintain or enhance greater sage-grouse habitat." The Service believes that the installation of a transmission line via a right-of-way grant from the BLM is not likely to maintain or enhance greater sage-grouse habitat. Because the Project is likely to destroy and degrade greater sage-grouse habitat, a compensatory mitigation plan should be developed for this Project.	Comment noted. Information regarding TransWest's commitment to prepare a compensatory mitigation plan as part of the Habitat Equivalency Analysis for greater sage-grouse is provided in DEIS Section 3.8.6.4 Region 1 (page 3.8-60).
U.S. Fish and Wildlife Service	556-1102	Page 3.8-14; Section 3.8.4.1 The DEIS states that, for the whooping crane, "No new depletions will occur by the proposed Project in the Platte River system in Wyoming. No impacts are expected to the whooping crane and no whooping crane analysis area has been defined for the Project." The Service acknowledges the assessment of depletions out of the Platte River system in Wyoming, and we recommend that the applicant address the potential for impacts to whooping crane critical habitat downstream of the analysis area as a result of depletions. Additionally, we recommend that the applicant contact the Wyoming State Engineer's Office to determine if water to be used for the Project would be a new or existing use. Any effects from water use that cannot be identified as having already been consulted on under the ESA will need to be addressed under section 7 consultation with the Service for this Project. Formal interagency consultation under section 7 of the ESA is required for projects that may lead to depletions of water from any system that is a tributary to the Platte River. Federal agency actions resulting in water depletions to the Platte River system may affect the endangered whooping crane, pallid sturgeon, least tern, and threatened western prairie fringed orchid, and their habitat downstream. In addition, upstream depletions may contribute to the destruction or adverse modification of designated critical habitat for the whooping crane. Any actions that may result in a water depletion should be identified. The document should include an estimate of the amount and timing of average annual water use (both historic and new uses) and methods of arriving at such estimates; location of where water use or diversion occurs, as specifically as possible; if and when the water will be returned to the system; and the intended use of the water. Depending upon the details of the project, the Service may have more specific questions regarding the potential consumptive use of water. Any depletions (whether new or historic that result from any consumptive water use within the Platte system) not already consulted on would result in a may affect, likely to adversely affect determination for whooping crane and its designated critical habitat.	Thank you for your comment. As specified in Appendix D of the Draft EIS, the Applicant would procure water required for foundation construction and dust control from existing municipal or commercial sources, or under temporary water use agreements with landowners holding existing water rights. Whether or not these sources have already been consulted on under the ESA will either be determined during the section 7 consultation process or, if specific sources have not been identified prior to submittal of the final BA, potential water depletions to the Platte and Colorado Rivers will be calculated based on construction needs in these watersheds and depletion fees will be paid into the respective recovery programs if and as appropriate.
U.S. Fish and Wildlife Service	556-1103	Page 3.8-16; Section 3.8.4.1 The DEIS states that "It is unlikely that nesting interior least terns/piping plovers would be present within the special status wildlife analysis area. No new depletions will occur by the proposed Project in the Platte River system in Wyoming. No impacts are expected to the interior least tern/piping plover and no interior least tern/piping plover analysis area has been defined for the Project." See comment above. Any effects that cannot be identified as having already been consulted on under the ESA will need to be addressed under consultation with the Service for this Project. Any depletions (whether new or historic that result from any consumptive water use within the Platte system) not already consulted on would result in a may affect, likely to adversely affect determination for the interior least tern and piping plover.	Thank you for your comment. As specified in Appendix D of the Draft EIS, the Applicant would procure water required for foundation construction and dust control from existing municipal or commercial sources, or under temporary water use agreements with landowners holding existing water rights. Whether or not these sources have already been consulted on under the ESA will either be determined during the Section 7 consultation process or, if specific sources have not been identified prior to submittal of the final BA, potential water depletions to the Platte and Colorado Rivers will be calculated based on construction needs in these watersheds. Prior to construction, depletion fees would be paid into the respective recovery programs, if and as appropriate, based on project water needs determined during preparation of the Notice to Proceed Plan of Development.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1104	Page 3.8-16 and 17; Section 3.8.4.1 The DEIS is correct in stating that Federal candidate species receive no statutory protection under the ESA. However, Federal agencies should consider conferencing on a candidate species when there is a possibility that the species may be proposed or listed under the ESA during the course of the project. Conferencing on candidate species allows the Federal agency the opportunity to officially request concurrence about the project's impacts to the species, which can then be converted into a consultation should the species become listed.	The Section 7 Consultation Agreement for the TransWest Express Transmission Project specifies that species that are proposed or candidates for listing under the ESA will be addressed in the TWE BA. Because the yellow-billed cuckoo (YBCU), upon which this comment is based, is now a proposed threatened species, the BA will include a determination of effects for this species and it is anticipated that the USFWS will issue a conference opinion on potential impacts to YBCU. Formal conferencing for YBCU would only occur if the Service determines, after reviewing the BA, that the project is likely to result in jeopardy of this YBCU or adverse modification of its proposed critical habitat. The BLM has elected not to conference on species, such as greater sage-grouse, that are candidates for listing under the ESA.
U.S. Fish and Wildlife Service	556-1105	Page 3.8-17, 3.8-125; Section 3.8.3, 3.8.6.6 YBCU has also been documented occurring along the Virgin River and in the Pahrnagat Valley in Nevada.	Text in Section 3.8 and Appendix G have been modified to address comment.
U.S. Fish and Wildlife Service	556-1106	Page 3.8-18; Section 3.8.3 Under the 3rd full paragraph: it is unclear what is meant by "In the NV portion of the southwestern willow flycatcher analysis area, essential habit for the SWFL is identified on the Pahrnagat and Muddy Rivers." Is this referring to critical habitat? If so, this is incorrect; critical habitat for the SWFL was not designated along the Muddy River or in Pahrnagat Valley in Nevada. Perhaps this section needs to be updated with the final redesignation of CH for the SWFL.	Text has been clarified in Section 3.8. Designated critical habitat for the southwestern willow flycatcher has been updated with current information.
U.S. Fish and Wildlife Service	556-1107	Page 3.8-35 to 3.8-36; Section 3.8.6 The Service acknowledges the inclusion of direct and indirect impacts in Table 3.8-15, the relevant analysis considerations for special status wildlife species, as well as the text on page 3.8.36. However, limiting the impact assessment analysis area to a 250-foot-wide transmission line ROW for special status species does not appear to adequately address all potential direct and indirect effects that the Project may have on these species.	Direct and indirect impacts to special status species have been analyzed out to one mile from the transmission reference line (2-mile corridor width). The width of this analysis area has been clarified in Table 3.8-15 and associated text.
U.S. Fish and Wildlife Service	556-1108	Page 3.8-37 and C-126; Section 3.8.6, Table C.5-1 Mitigation measure SSWS-6 states "To prevent impacts to the western yellow-billed cuckoo during the breeding season, TWE would avoid construction within potentially suitable habitat from March 15 to October 15, or, alternatively, would conduct breeding western yellow-billed cuckoo surveys and implement appropriate mitigation in coordination with the BLM, Western, USFWS, and applicable state wildlife agencies." The Service recommends that the measure include the avoidance of construction within potentially suitable habitat as well as within a to-be-determined buffer from potentially suitable habitat during nesting season for this species.	Thank you for your comment. We look forward to working with the USFWS to determine an appropriate buffer for potentially suitable yellow-billed cuckoo habitat during the Section 7 consultation process. An example of a yellow-billed cuckoo stipulation, proposed as part of the BLM Cedar City Field Office RMP revision, entails no surface-disturbing activities being allowed within 100 meters of yellow-billed cuckoo habitat from May 15th through July 20th.
U.S. Fish and Wildlife Service	556-1109	Page 3.8-39; Section 3.8.6 The DEIS should also address impacts to designated critical habitat for the whooping crane, as critical habitat for this species is affected by depletions of the Platte River basin.	There would be no direct impacts to critical habitat for the Whooping Crane. Indirect impacts resulting from potential water depletions will be determined through the Section 7 consultation process. Refer to the response to Comment 556-1102, above.
U.S. Fish and Wildlife Service	556-1110	Page 3.8-39; Section 3.8.6 The DEIS states that "TWE has indicated that all water requirements for the Project will be met using existing water rights. Required water will be procured from municipal sources, from commercial sources, or under a temporary water use agreement with landowners holding existing water rights. No new water rights will be required. Therefore, construction of the Northern Terminal is anticipated to result in no new depletions within the Platte River basin, including the upper portion of the North Platte River and the downstream section of the Platte River basin in Nebraska. Confirmation of this determination will be ultimately made by the Wyoming State Engineers Office (SEO). Therefore, downstream impacts to habitat for these three federally listed species would not occur." The Service seeks clarification regarding water use and water rights: although no new water rights may be required for the project, existing water uses that have not previously been consulted on by the Service may have downstream impacts to the federally listed species and their designated critical habitats and would result in new effects with respect to the Platte River Recovery Implementation Program.	Comment noted. Information regarding the potential for impacts to Platte River species from water depletions and anticipated section 7 consultations for this issue has been incorporated into section 3.8.6.
U.S. Fish and Wildlife Service	556-1111	Page 3.8-49 to 3.8-50; Section 3.8.6.4 Table 3.8-20 shows the various alternatives for Region I and the number of occupied leks within certain distances of the reference line of the Project. Alternative I-D appears to have more occupied leks closer to it than other alternatives in Wyoming and in total, but is currently the agency-preferred alternative. It does not appear that the information contained in Table 3.8-20 supports Alternative I-D as the least impactful alternative to greater sage-grouse.	Comment noted. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and Applicant objectives while balancing federal land managers' multiple use mandate.

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U.S. Fish and Wildlife Service	556-1112	Page 3.8-50 through 3.8-60; Section 3.8.6.4 An objective of the Framework for greater sage-grouse is to conduct the impact analysis addressing all direct and indirect impacts of the project to both the sage-grouse and its habitat prior to developing the Mitigation Plan. Thus, we recommend that the final assessment of the full range of impacts resulting from construction, operation, and maintenance of the TWE project include all impacts identified and evaluated within bullet point #1 and #2 of the Framework, as well as those identified within the HEA. Consequently, the Mitigation Plan should include compensatory measures to offset not only impacts associated with habitat services lost (i.e., using the HEA), but also should include measures to offset all other impacts to the sage-grouse – not accounted for in the HEA – as well.	Thank you for your comment. Section 3.8.6.4 has been revised and augmented to better reflect the direction contained in the Framework for Sage-grouse Impacts Analysis for the TWE Transmission Project. In addition, EIS mitigation measure SSWS-5 has been augmented to further avoid and minimize direct and indirect impacts to greater sage-grouse resulting from construction, operations, and maintenance of the transmission line. The appropriate level of compensatory mitigation for direct and indirect impacts to sage-grouse habitat services will be determined through the HEA.
U.S. Fish and Wildlife Service	556-1113	Page 3.8-51; Section 3.8.6.4 In Table 3.8-21, Summary of Region I Alternative Route Impact Parameters for greater sage-grouse habitat, recommend that you clarify the term “impact” to specify either impact within the 2-mile ROW or impact within the 250 foot ROW. It is currently unclear. Also recommend a footnote to disclose that there may be disturbance to habitat that falls outside the 2-mile ROW that is not captured in this table. Same comment for the respective tables in the other Regions (II and III)	Thank you for your comment. Text clarifying how impact acreages are calculated has been added to the FEIS. The lead agencies are not aware of any potential project-related impacts that would occur outside of the 2-mile analysis corridor.
U.S. Fish and Wildlife Service	556-1114	Page 3.8-52; Section 3.8.6.4 Table 3.8-22 shows lek attendance within four miles of the reference line for alternatives in Region I. Alternative I-D appears to have a high number of leks as well as average lek attendance compared to the other alternatives.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The potential impacts of alternatives on sage grouse habitat and leks was one of the many resource considerations in determining the agencies preferred alternative. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate.
U.S. Fish and Wildlife Service	556-1115	Page 3.8-52; Section 3.8.6.4 Table 3.8-23 presents the number of visible leks within a certain distance of the reference line, and Alternative I-D appears to have more leks closer to it than other alternatives in Wyoming.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The potential impacts of alternatives on sage grouse habitat and leks was one of the many resource considerations in determining the agencies preferred alternative. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies’ purpose and need and applicant objectives while balancing federal land managers’ multiple use mandate.
U.S. Fish and Wildlife Service	556-1116	Page 3.8-56; Section 3.8.6.4 The DEIS states that “Fragmentation of sagebrush habitats also may interrupt the exchange of genetic material between distinct isolated areas of suitable breeding habitat.” The Service recommends that this be rephrased into “...may interrupt gene flow between distinct isolated areas...” as this is more common terminology when referring to the exchange of genes.	Section 3.8.6.4 has been revised to address comment.
U.S. Fish and Wildlife Service	556-1117	Page 3.8-56; Section 3.8.6.4 In your analysis of construction impacts to greater sage-grouse, recommend that you separate the impact analysis into effects to habitat and effects to individuals/populations by life stage.	To the extent possible, the FEIS has been updated to more fully disclose potential impacts on greater sage-grouse habitats, seasonal use patterns, breeding and nesting grouse, and brood-rearing hens.
U.S. Fish and Wildlife Service	556-1118	Page 3.8-56; Section 3.8.6.4 In your analysis of construction impacts to greater sage-grouse, recommend that you disclose how the spread of invasive and noxious plant species may affect greater sage-grouse. For example, invasive and noxious plants may out-compete native forbs which greater sage-grouse rely on for forage during brood-rearing.	The FEIS has been updated to describe how the spread of invasive and noxious plant species has potential to impact greater sage-grouse brood-rearing habitat.
U.S. Fish and Wildlife Service	556-1119	Page 3.8-56; Section 3.8.6.4 In your analysis of construction impacts to greater sage-grouse, recommend that you additionally discuss the effect of the project in disrupting seasonal migration and movement between populations. Also recommend that in your discussion of bird displacement and loss of habitat, you identify the availability of “refuge” habitat for displaced birds in each Region.	Text regarding impacts to sage-grouse seasonal migration has been included in Section 3.8.6 of the FEIS to address this comment. The lead agencies are not aware of a source of information regarding the availability of “refuge” habitat in each of the project regions. If refuge habitat (i.e., suitable, unoccupied habitat) is available adjacent to the proposed transmission line route, it would minimize the potential impacts of displacement, which are described in the EIS.
U.S. Fish and Wildlife Service	556-1120	Page 3.8-56; Section 3.8.6.4 This section discusses impacts to greater sage-grouse in Region I as a result of Transmission Line Construction and Operation. It also discusses Off-site Compensatory Mitigation and the Habitat Equivalency Analysis for greater sage-grouse. We recommend the following:	Thank you for your comment. Responses to your recommendations are captured in the responses to comments 556-1121 and 556-1122.
U.S. Fish and Wildlife Service	556-1121	Page 3.8-56; Section 3.8.6.4 a) In your evaluation of construction impacts to greater sage-grouse, we recommend that you disclose and evaluate the effect of disturbance to birds that may encounter construction activity as they migrate for example, from brood-rearing habitat to wintering habitat.	Thank you for your comment. Text regarding potential project-related impacts to sage-grouse seasonal migration has been included in Section 3.8.6 of the FEIS.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1122	Page 3.8-56; Section 3.8.6.4 b) In your evaluation of construction impacts to greater sage-grouse, we recommend that you tie proposed avoidance/minimization measures to each impact and then identify residual impacts to be mitigation using compensatory mitigation.	EIS mitigation measure SSWS-5 has been revised and augmented to include avoidance and minimization measures for specific types of impacts. Compensatory mitigation for impacts to sage-grouse habitat will be determined through the HEA process.
U.S. Fish and Wildlife Service	556-1123	Page 3.8-56; Section 3.8.6.4 For the following reasons, we do not agree that the application of ECO-1, ECO-4 and TWE-32 will require TWE to identify sensitive areas for greater sage-grouse and implement seasonal timing restrictions and protection buffers: 1) ECO-1 uses non-binding language, "to the extent feasible," where it suggests the applicant shall identify sensitive habitats and design the project to avoid, minimize or mitigate impacts. ECO-1 does not acknowledge the need for spatial buffers for sensitive habitats. ECO-1 is also only applicable to the planning phase of the project. Consequently, any micro-siting that happens after the planning phase may not incorporate this measure; 2) ECO-4 applies only to "ESA-listed species." The rest of the document refers separately to Federally listed and Candidate species, which leads one to believe that Candidate species such as greater sage-grouse are not considered ESA-listed in this document. 3) TWE-32 is also non-binding and not descriptive enough to ensure that TWE will adhere to seasonal restrictions for greater sage-grouse. 4) None of the measures (ECO-1, ECO-4, or TWE-32) references spatial buffers for greater sage-grouse. There is only a reference to potential avoidance buffers for nesting raptors. To address the deficiencies in these measures, we recommend that you: a) Revise ECO-1 to use binding language, mark it as applicable to the construction phase, and add that applicants shall also identify spatial and temporal buffers for avoidance, minimization and mitigation; b) Revise ECO-4 to include the identification and marking of geographic buffers for sensitive habitats and specify that the measure also applies to candidate species; c) Make TWE-32 binding and disclose specific seasonal restrictions; and d) specifically call out seasonal restrictions in lekking and nesting habitat (eg. Utah: Feb 15 – June 15), and wintering habitat (eg. Utah: Nov 15 – March 15).	ECO-1 and ECO-4 are measures from the Westwide Energy Corridor EIS and, while generally applicable, do not carry as much weight or specificity as existing BLM RMP stipulations, USFS LRMP standards, or TWE Applicant-committed measures addressing potential impacts to sage-grouse and sage-grouse habitat. Because ECO-1 and ECO-4 were developed as part of a separate NEPA process, it would not be appropriate to modify them for the purposes of this EIS. TWE-32 commits the Applicant to modifying or discontinuing disturbance activities as required by permitting agencies and incorporating seasonal restrictions and stipulations contained in the federal agency RODs. In that it defers to agency requirements and decision documents, this measure is in fact binding. Spatial buffers for greater sage-grouse are defined in the applicable BLM RMP stipulations and USFS LRMP standards. The decision-makers may elect to apply spatio-temporal buffers developed as part of the on-going greater sage-grouse RMP/LRMP amendment processes or define standard spatio-temporal buffers to be applied to sage-grouse leks and other sensitive habitats across the project area as a whole in the TWE RODs.
U.S. Fish and Wildlife Service	556-1124	Page 3.8-56; Section 3.8.6.4 Recommend that you include the following spatial buffers to avoid and minimize impacts of construction to greater sage-grouse: 1) Avoid construction activity and earth disturbance within a 4-mile buffer surrounding leks during the lekking and nesting season. 2) Avoid construction activity and earth disturbance in winter habitat between November 15 - March 15.	Thank you for the additional input on spatial buffers around leks and winter habitat construction-timing restrictions. TWE intends to conform with all current, applicable requirements for greater sage-grouse, including those resulting from the any recent BLM and USFS land use plan amendments in place at the time of the ROD. Additional mitigation measures are identified in SSWS-5, which has been revised and augmented for the FEIS. Note also that the decision makers may elect to mandate project conformance with spatio-temporal buffers developed specifically for the TWE project if the current BLM and USFS greater sage-grouse plan amendments are not yet complete at the time of the ROD.
U.S. Fish and Wildlife Service	556-1125	Page 3.8-56; Section 3.8.6.4 1) Avoid construction activity and earth disturbance within a 4-mile buffer surrounding leks during the lekking and nesting season.	Please refer to response to comment 556-1124.
U.S. Fish and Wildlife Service	556-1126	Page 3.8-56; Section 3.8.6.4 2) Avoid construction activity and earth disturbance in winter habitat between November 15 – March 15.	Please refer to response to comment 556-1124.
U.S. Fish and Wildlife Service	556-1127	Page 3.8-56; Section 3.8.6.4 Recommend that you incorporate the following design feature: Where the line crosses through occupied greater sage-grouse habitat, TWE will coordinate with Rocky Mountain Power for the proposed Energy Gateway South transmission line to co-locate the lines as close to one another as possible. We are aware that industry safety standards allow for separation distances as minimal as 250 feet. This recommendation is consistent with objectives outlined in the COT report (pages 43-44, 51).	Coordination with RMP is ongoing. Colocation of both lines at 250 feet separation distance is the current stated goal of both proponents. The final engineered alignment for the TWE Project will be determined based on site-specific resource constraints and consideration of the placement of existing and proposed lines such as Energy Gateway South. This engineered alignment will be finalized as part of the Plan of Development that will be issued subsequent to the Record of Decision for this EIS.
U.S. Fish and Wildlife Service	556-1128	Page 3.8-56; Section 3.8.6.4 Recommend that you identify the remaining (or residual) impacts to greater sage-grouse and its habitat (i.e. those that will not be fully avoided with measures ECO-1, ECO-4 and TWE-32). These remaining measures should form the basis for compensatory mitigation discussions.	EIS mitigation measure SSWS-5 has been revised and augmented to better avoid and minimize potential project-related impacts to greater sage-grouse. Compensatory mitigation for sage-grouse will focus on habitat services lost as a result of project construction, operation, and maintenance and be determined through the HEA process.
U.S. Fish and Wildlife Service	556-1129	Page 3.8-56; Section 3.8.6.4 Where you state that TWE will follow measures included in various BLM Ims, Executive Orders, state management plans, BLM RMPs and forest management plans, we recommend that you specifically outline those measures for disclosure and comment in the NEPA document. Measures can be inconsistent between documents and plans, so in the absence of additional specifics, it isn't clear to the reader what may or may not be implemented.	TWE intends to conform with all current, applicable requirements for greater sage-grouse including BLM RMP stipulations and instruction memoranda, USFS standards, executive orders, state conservation plans, etc. Please refer to the revised additional mitigation measure SSWS-5 in the FEIS. Note also that the decision makers may elect to mandate project conformance with greater sage-grouse spatio-temporal buffers identified through the on-going RMP/LRMP amendment processes (if not yet finalized at the time of the TWE ROD) or with spatio-temporal buffers developed specifically for the TWE project.

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U.S. Fish and Wildlife Service	556-1130	Page 3.8-56; Section 3.8.6.4 In general, the section regarding construction impacts does not identify how the project and BLM has followed the direction and principles provided by various BLM Ims, LUPs, and its National Strategy as discussed on pages 3.8-12 and 3.8-13. We recommend that you go beyond providing a general Design Feature to "avoid sensitive habitats" and specifically identify how the project has protected un-fragmented habitats for example by identifying where un-fragmented habitats exist and how these habitats were avoided.	Project alternatives have been designed to be located in existing designated utility corridors wherever possible to, in part, minimize habitat fragmentation. For the FEIS, the agency preferred alternative corridor in Moffat County Colorado was relocated to conform with the proposed ROW avoidance zone identified in the applicable BLM land use plan amendment Draft EIS.
U.S. Fish and Wildlife Service	556-1131	Page 3.8-56 through 3.8-61; Section 3.8.6.4 After disclosure of construction and operation impacts and Off-site compensatory mitigation on these pages, BLM should determine and disclose whether the "proposed ROW and mitigation measures would cumulatively maintain or enhance greater sage-grouse habitat" per BLM IM 2012-043.	BLM IM 2012-043 does not mandate that a proposed ROW and mitigation measures cumulatively maintain or enhance greater sage-grouse habitat. Rather, for ROW applications where the total project disturbance is greater than 1 linear mile and a field office determines that is appropriate to authorize a ROW, this IM mandates that the BLM: (1) document the reason for its determination and require the ROW holder to implement measures to minimize impacts to sage-grouse habitat; (2) in addition to considering opportunities for onsite mitigation, consider implementing appropriate offsite mitigation; and (3) forward the decision to the appropriate BLM State Director, State Wildlife Agency director, and FWS representative for their review unless the BLM determines (in coordination with the respective state wildlife agency) that the proposed ROW would cumulatively maintain or enhance greater sage-grouse habitat. Following completion of the TWE Greater Sage-Grouse HEA and associated compensatory mitigation plan, the BLM will determine whether the plan, in combination with impact avoidance and minimization measures, is sufficient to maintain or enhance GRS habitat. If it is not, and the appropriate BLM GRS land use plan amendments are not in place by the time of the TWE ROD (at which time this IM will have expired), then the BLM Wyoming State Director will forward the proposed ROW decision to applicable state wildlife agencies and the FWS for review.
U.S. Fish and Wildlife Service	556-1132	Page 3.8-57; Section 3.8.6.4 The Service acknowledges the discussion of the threats that static wires and guy wires pose to greater sage-grouse.	Thank you for your comment.
U.S. Fish and Wildlife Service	556-1133	Page 3.8-58 – 3.8-59; Section 3.8.6.4 We recommend that you establish, at a minimum, a 0.6 mile buffer on either side of the transmission line and calculate the acreage of greater sage-grouse habitat within that buffer. Based on available literature (Attachment 2 at the end of this table), we find that this buffer adequately represents the area of indirect effects resulting from the presence of a transmission line.	Comment noted. Indirect impacts for the TWE DEIS were calculated using a 1-mile buffer on either side of the transmission line as discussed in Section 3.7.6.2 (DEIS page 3.7-46). The information source provided will be reviewed and considered for inclusion in the FEIS.
U.S. Fish and Wildlife Service	556-1134	Page 3.8-59 to 3.8-60; Section 3.8.6.4 The Service acknowledges that TWE has developed a framework for impact analysis for the greater sage-grouse, and has utilized the habitat equivalency analysis process to quantify habitat services lost as a result of the project. We anticipate ongoing coordination with TWE in developing and directing compensatory mitigation measures for this project as well. The Service recommends that the greater sage-grouse mitigation framework, including the HEA, be included in the FEIS as an appendix, along with a general review of the potential impacts of the proposed compensatory mitigation projects.	A draft greater sage-grouse mitigation plan, including the HEA and associated mitigation, will be provided as an appendix to the FEIS.
U.S. Fish and Wildlife Service	556-1135	Page 3.8-60; Section 3.8.6.4 We recommend that the Habitat Equivalency Analysis for greater sage-grouse incorporate a buffer of 0.6 mile on either side of the transmission line (in greater sage-grouse occupied habitat) to represent greater sage-grouse habitat subject to indirect effects of the transmission line. This acreage should be considered for compensatory mitigation as it represents degradation and fragmentation of sage-grouse habitat that cannot be avoided.	Thank you for your comment, the EIS conservatively assumes that indirect effects extend out to one mile from the transmission line and associated facilities (Section 3.7.6.2) for all wildlife species. Compensatory mitigation for impacts to sage-grouse habitat are being identified through TransWest's HEA process.
U.S. Fish and Wildlife Service	556-1136	Page 3.8-60 to 3.8-61; Section 3.8.6.4 The proposed compensatory mitigation projects outlined here (fence marking, modification, or removal; sagebrush restoration or enhancement projects; understory improvement projects; conifer removal; brood-rearing habitat improvement; and conservation easements) appear to be listed in order of preference by TWE. Please clarify whether these projects are currently listed in order and if additional projects may be considered. A stand-alone Mitigation Plan should be developed for this project that includes mitigation associated with the HEA as well as mitigation to address impacts associated with any and all other direct and indirect effects to sage-grouse as laid out in bullet points #1 and #2 of the Impacts Analysis Framework for sage-grouse.	The potential sage-grouse mitigation measures referenced in this comment are not listed in order of preference, the list is simply meant to provide examples of the types of mitigation that will be considered to compensate for habitat services lost due to project implementation. As stated in the EIS, mitigation to be considered is not limited to those listed in the document; i.e., the lead agencies and Applicant are open to considering additional measures. The HEA and associated mitigation plan will be a stand-alone document. It is anticipated that a draft of this document will be appended to the Final EIS and that the final will be appended to the ROD.
U.S. Fish and Wildlife Service	556-1137	Page 3.8-61, 3.8-68, 3.8-71, and 3.8-73; Section 3.8.6.4 Regarding potential impacts to federally listed species in the Platte River basin, the use of the water, not the water rights, should be determined whether it is existing and whether it has been consulted on with the Service previously. Additionally, potential impacts to designated critical habitat for the whooping crane should also be addressed.	See response to Comment 556-1102.
U.S. Fish and Wildlife Service	556-1138	Page 3.8-76 and 3.8-77; Section 3.8.6.4 Table 3.8-27 summarizes micro-siting options for impacts to federally listed species at the Tuttle Easement. The way the information is currently presented, it is difficult for the reader to understand what these alternatives mean and how they differ from each other.	Table 3.8-27 and associated text have been revised to address comment.

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U.S. Fish and Wildlife Service	556-1139	Page 3.8-81; Section 3.8.6.5 For Table 3.8-32, Summary of Region II Alternative Route Impact Parameters for greater sage-grouse habitat, recommend that you identify how and why the impact parameters differ from those presented for Regions I and III. This could be added as a footnote to the table.	The same greater sage-grouse impact parameters are evaluated for Region II as Region I. As noted in Table 3.8-3, greater sage-grouse habitat nomenclature differs between Wyoming (core areas), Colorado (PPH and PGH) and Utah (occupied habitat consisting of nesting/brood-rearing and wintering habitats) but the impact parameters are applied consistently within these habitats. No change to text.
U.S. Fish and Wildlife Service	556-1140	Page 3.8-91; Section 3.8.6.5 For section 3.8.6.5, Region II, recommend providing a paragraph that discusses why the impact parameters for greater sage-grouse changed between Region I and Region II.	The same greater sage-grouse impact parameters are evaluated for Region II as Region I. As noted in Table 3.8-3, greater sage-grouse habitat nomenclature differs between Wyoming (core areas), Colorado (PPH and PGH) and Utah (occupied habitat consisting of nesting/brood-rearing and wintering habitats) but the impact parameters are applied consistently within these habitats. No change to text.
U.S. Fish and Wildlife Service	556-1141	Page 3.8-116; Section 3.8.6.6 For section 3.8.6.6, Region III, recommend providing a paragraph that discusses why the impact parameters for greater sage-grouse changed between Regions I, II and III.	Comment noted. Parameters used for Region III are the same as those in Regions I and II. Lek attendance analysis is not presented for Region III as there is only a single lek within 4 miles of the project Alternative III-A in this region.
U.S. Fish and Wildlife Service	556-1142	Page 3.8-117; Section 3.8.6.6 The section dealing with desert tortoise should be revised, as it describes both desert tortoise and sage-grouse leks.	Section 3.8.6.6 has been modified to address comment.
U.S. Fish and Wildlife Service	556-1143	Page 3.8-117, C-6; Section 3.8.6.6, Appendix C The BLM should consider proposing minimization measures for travel management. Typically this includes reduced speed limits during more active periods, increasing the number of authorized desert tortoise biologists, decreasing traffic trips, etc. The BLM in Las Vegas will be able to provide the main BLM contact with this information.	Thank you for your comment. We will add standard desert tortoise conservation measures, including those suggested in the comment, to mitigation measure SSWS-4. Please note that the final impact avoidance and minimization measures for desert tortoise will be determined during the ESA section 7 consultation for this species.
U.S. Fish and Wildlife Service	556-1144	Page 3.8-118; Section 3.8.6.6 For Table 3.8-44, Summary of Region III Alternative Route Impact Parameters for greater sage-grouse habitat, recommend that you identify how and why the impact parameters differ from those presented for Regions I and II. This could be added as a footnote to the table.	Comment noted. Parameters used for Region III are the same as those in Regions I and II. Lek attendance analysis is not presented for Region III as there is only a single lek within 4 miles of the project Alternative III-A in this region.
U.S. Fish and Wildlife Service	556-1145	Page 3.8-123; Section 3.8.6.6 The following statement is included under Yuma clapper rail but it can also be a big impact on desert tortoises: "Improved access as a result of Project roads under Alternative III-A may result in increased human disturbance to the species. These impacts would be more pronounced if construction were to occur during the breeding season." We recommend that the EIS include a similar statement for desert tortoise.	FEIS Section 3.8.6 Impacts Common to all Alternative Routes and Components will be updated to address comment.
U.S. Fish and Wildlife Service	556-1146	Page 3.9-10; Section 3.9.6.2 The DEIS states that construction impacts to flowing streams would include fords and culverts; and, if needed, that culverts would be installed under the direction of engineers, hydrologists, and biologists from the BLM, USFS, and state agencies. The Army Corps of Engineers should be included in this list.	The US Army Corps of Engineers was added to the sentence in Section 3.9.6.2, Construction Impacts.
U.S. Fish and Wildlife Service	556-1147	Page 3.9-12; Section 3.9.6.2 The DEIS states that "The estimated water use required per mile of transmission line construction is approximately 3,400 gallons for foundation concrete and 240,000 gallons for dust control. Water would be obtained from municipal sources, commercial sources, or a temporary water use agreement with landowners or irrigation companies holding existing water rights. The effect determination of new and existing water depletions would be made after the water sources are identified and an evaluation of their potential connection to surface flows is completed. Existing water rights would be used for concrete production and dust control during construction of project transmission line and associated facilities. The determination of potential depletions would be made after specific water sources are identified. The evaluation would determine if water use could affect surface water quantity or habitat used by aquatic species." This description of water uses and whether they are considered a new or existing depletion contradicts DEIS chapter 3.8 Special Status Wildlife, which states that there would be no new water use and therefore no effect to federally listed species as a result of water use. We recommend clarification in DEIS chapter 3.8 Special Status Wildlife that states that the determination of potential depletions would be made after specific water sources are identified. See comment regarding pages 3.8-61, 3.8-68, 3.8-71, and 3.8-73.	The information regarding water use is correct in Section 3.9.6.1. Section 3.8.6.4 was revised to include this information.
U.S. Fish and Wildlife Service	556-1149	Page 3.10-4 to 3.10-7; Section 3.10.4.1 Federally listed fish species (bonytail, Colorado pikeminnow, humpback chub, and razorback sucker) all have designated critical habitat that could be affected by water use for the Project. We recommend including reference to these designated critical habitats as well as potential impacts that depletions may have on designated critical habitat.	Section 3.10.4.1 identifies critical habitat for the four endangered fish species; no revisions are required. Impact discussions for water depletion effects on federally endangered fish species were modified in Sections 3.10.6.3, 3.10.6.4, and 3.10.6.5 to include a reference to critical habitat.
U.S. Fish and Wildlife Service	556-1150	Page 3.10-8; Section 3.10.4.2 The DEIS states that the Columbia spotted frog "was placed on a candidate list in 1993." The Service recommends clarification about what type of list this was (i.e. state or Federal, under state laws or the ESA).	The sentence was deleted and replaced with reference to the most recent candidate species review (USFWS 2012).

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U.S. Fish and Wildlife Service	556-1154	Page 3.10-13; Section 3.10.6.1The Service acknowledges the discussion regarding water use and its potential effects on federally listed species downstream: "Water required for the construction of the Southern Terminal is estimated to be 1.2 acre-feet. The source of the water would be existing rights. The effect determination of new and existing water depletions would be made after the water sources are identified and an evaluation of their potential connection to surface flows is completed. Consultation with the USFWS would be completed to determine if construction water use could affect federally listed fish species (razorback sucker) in the Lower Colorado River Basin." However, any such analysis must include an evaluation of impacts to all federally listed fishes— and designated critical habitat—occurring in the Colorado River Basin. Additionally, potential impacts to Colorado River fishes and critical habitat occur within the "upper" Colorado River Basin rather than the "lower" as stated.	The discussion of water use for the Southern Terminal in Section 3.10.6.1 was revised to reference federally listed fish species and their critical habitat. The last sentence also was revised to ". . . the Upper Colorado River Basin".
U.S. Fish and Wildlife Service	556-1156	Page 3.10-18; Section 3.10.6.3 The DEIS states that "Water use for this project (i.e., approximately 2 acre-feet for foundation concrete and 114 acre-feet for dust control) would be obtained from municipal sources, commercial sources, or a temporary water use agreement with landowners holding existing water rights." Please note that once the sources of the water to be used have been identified, TWE should determine whether those sources have previously been consulted on with the Service.	Specific water sources will not be determined for the FEIS. Therefore, it will not be possible to determine if the water sources have been through previous consultation. The situation regarding previous consultation with the USFWS will be added to Sections 3.10.6. 3, 3.10.6.4, and 3.10.6.5. The USFWS will consider the water sources as depletions, if previous consultations for water sources can not be determined at this time.
U.S. Fish and Wildlife Service	556-1157	Page 5-1 to 5-2; Section 5.1.1 The design options that connect the Project with other projects other than at the northern and southern portions of the line may need to be considered in the overview of related actions.	Section 5.1.1 of the Final EIS was revised to include information regarding potential projects that may connect to the Project if design options are implemented.
U.S. Fish and Wildlife Service	556-1158	Page 5-3 to 5-4; Section 5.2.1.1 Table 5-1, column three does not have units identified.	The unit (acres) was added to Table 5-1, column three of the Final EIS.
U.S. Fish and Wildlife Service	556-1159	Page 41401; Section 5.2.1.2 Table 5-3, column two does not have units identified.	The unit (acres) was added to Table 5-1, column three of the Final EIS.
U.S. Fish and Wildlife Service	556-1160	Page 41421; Section 5.3.4.2 Table 5-15, column three does not have units identified.	The unit (acres) was added to Table 5-1, column three of the Final EIS.
U.S. Fish and Wildlife Service	556-1161	Page 5-28 thru 5-29; Section 5.3.6 The cumulative effect analysis for special status plants could benefit from additional information. The incremental effect of the TWE line to clay phacelia habitat for example is much greater than that for Ute ladies'-tresses. We recommend that you categorize the special status plants by size of range relative to the 2-mile corridor. What percentage of a species' habitat falls within the 2-mile corridor? What percentage of all known occurrences for a species falls within the 2-mile corridor? The text should mark that distinction for plants, like clay phacelia, with limited ranges.	Section 5.3.6 of the Final EIS was revised to provide additional detail regarding the context of the cumulative impacts on clay phacelia and any other sensitive plant species with limited ranges.
U.S. Fish and Wildlife Service	556-1162	Page 5-28 to 5-29; Section 5.3.6.2The cumulative impacts section of the DEIS discusses potential impacts to federally listed plant species that may be affected by three parallel transmission lines 1500 feet apart. To help avoid and minimize cumulative impacts to these plants, the Service recommends that the projects consider collocating transmission lines on the same structure or placing parallel lines closer than 1500 feet from each other, i.e. 250 feet.	To address resource concerns and minimize disturbance, TWE has committed to a 250' separation from existing lines. Additionally, TWE and PacifiCorp have committed to coordinating in collocating the TWE and proposed Energy Gateway South projects to the extent possible.
U.S. Fish and Wildlife Service	556-1163	Page 41423; Section 5.3.7 The analysis provided here regarding cumulative effects of the Project on wildlife is inadequate. No methodology is provided on how "Cumulative Disturbance from RFFA (acres)" were derived. Impacts are estimated in terms of habitat impacts for wildlife species and then conclusions are presented about likely impacts to populations. This is problematic as conclusions about populations and population viability should be derived from information/ data/studies/publications about wildlife populations. Also impacts to habitat and impacts to wildlife populations are not proportional in all cases. For some species the loss of even low amounts of habitat could possibly translate into significant population effects.	Section 5.3.7 of the Final EIS was revised to provide additional qualitative disclosure regarding the context of the habitat impacts on populations within the cumulative effects analysis area.

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U.S. Fish and Wildlife Service	556-1164	Page 41424; Section 5.3.8 The analysis provided here regarding cumulative effects of the Project on special status wildlife is inadequate. No methodology is provided on how "Cumulative Disturbance from RFFA (acres)" were derived. Impacts are estimated in terms of habitat impacts for wildlife species and then conclusions are presented about likely impacts to populations. This is problematic as conclusions about populations and population viability should be derived from information/data/studies/publications about wildlife populations. Also impacts to habitat and impacts to wildlife populations are not proportional in all cases. For some species the loss of even low amounts of habitat could possibly translate into significant population effects. The conclusory statement "The relative contribution of all Project alternatives to direct long-term impacts to these special status species would be less than 1 percent" lacks context and meaning. Conclusions for Special Status Wildlife Species should in part be based on project impacts to their populations or at least population trends within the analysis area.	Section 5.3.8 of the Final EIS was revised to provide additional qualitative disclosure regarding the context of the habitat impacts on populations within the cumulative effects analysis area.
U.S. Fish and Wildlife Service	556-1165	Page 13636; Section 5.3.10.2 The DEIS states that "The Project plans to utilize existing water rights, thereby avoiding depletions in the Colorado and Platte systems." This is an inaccurate generalization, as water rights and water use are different things with respect to depletion impacts on Platte River and Colorado River basin species. Any water use is a depletion; the Service is concerned with whether that use has already been consulted on.	Section 5.3.10.2 was revised to disclose proposed water sources and depletions to the Colorado and Platte systems and whether they have been already consulted on with the USFWS.
U.S. Fish and Wildlife Service	556-1166	Page App C, C-5; Section Appendix C For the biological assessment and consultation, BLM should be considering data on blasting and explosives (as described in PHYS-1 and PHYS-2) and specific ways to minimize effects to the desert tortoise.	Thank you for your comment. The BA will evaluate all potential Project-related impacts to listed species, including potential effects of blasting. As specified in Appendix D of the Draft EIS, any blasting undertaken as part of project construction would be conducted in accordance with a blasting plan, which would be part of the TWE COM Plan. The TWE Blasting Plan would address proposed methods for issuing blasting warnings, controlling fly rock, and eliminating the possibility of damage to buildings, structures, and other facilities susceptible to vibration or air blast damage.
U.S. Fish and Wildlife Service	556-1167	Page App C, C-8; Section C.1, Table C.1-1 BMP ECO-1 states that "Applicants shall identify important, sensitive, or unique habitats and BLM sensitive, FS sensitive, and state-listed species in the vicinity and, to the extent feasible, design the project to avoid, minimize, or mitigate impacts to these habitats and species." This BMP does not address federally listed species or migratory birds. The Service recommends that this measure additionally address species under the Service's purview either in this BMP or in a new BMP.	ECO-1 is a BMP from the Westwide Energy Corridor Record of Decision (ROD) and, as such, cannot be modified as part of this EIS. Applicable Project-specific mitigation measures for migratory birds include WLF-1 and WLF-2 described in Section 3.7, as well as SSWS-4, SSWS-5 and others presented in Section 3.8 of the Final EIS.
U.S. Fish and Wildlife Service	556-1168	Page App C, C-8; Section C.1 ECO-4: In this measure, recommend that you specify when TWE will identify areas known to support ESA-listed species, etc. and mark them with flagging. We recommend adding "prior to construction".	ECO-4 is a BMP from the Westwide Energy Corridor Record of Decision (ROD) and, as such, cannot be modified. However, the BMP stipulates that marking must occur to avoid direct impacts during construction activities which implies that this would necessarily occur before construction. Additionally, several RMP stipulations identify the need for "pre-construction flagging". The BLM feels appropriate direction is given through the BMPs and stipulations as currently stated.
U.S. Fish and Wildlife Service	556-1169	Page App C, C-8; Section C.1, Table C.1-1 BMP ECO-4 should include migratory birds, as they are protected by the Migratory Bird Treaty Act (MBTA) and any direct take of a migratory bird is a violation of the MBTA.	ECO-4 is a BMP from the Westwide Energy Corridor Record of Decision (ROD) and, as such, cannot be modified. Avoidance and minimization of Project impacts to breeding migratory birds are addressed through the additional mitigation measures WLF-1 and WLF-2, which would minimize disturbance to migratory birds, including raptors, during the breeding and nesting season.
U.S. Fish and Wildlife Service	556-1170	Page App C, C-16; Section C.2, Table C.2-1 Applicant committed design feature TWE-13 states that surface restoration will occur as required by the landowner or land management agency. The Service recommends that this measure additionally include monitoring of the restored area for successful restoration, and reporting of successful restoration.	The need for monitoring is addressed in separate Design Features. Per TWE-3, The COM Plan will include a mitigation monitoring plan that will address how each mitigation measure required by permitting agencies in their respective decision documents and permits will be monitored for compliance. Similar requirements are included in the WWEC BMPs GEN-7, VEG-2, MIT-1, MIT-2, and MIT-3. The monitoring requirement for reclamation is restated in the proposed mitigation measure VG-3, which further outlines monitoring timelines and the need for specific definitions of reclamation success by land management agency.
U.S. Fish and Wildlife Service	556-1171	Page App C, C-17; Section C.2, Table C.2-1 Applicant committed design feature TWE-30 states that "In applicable areas, the TWE Project will be designed to meet or exceed the raptor safe design standards described in the Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (Avian Power Line Interaction Committee (APLIC) 2006)." The Service recommends that this measure should be applied to the entire length of the Project, and not just "in applicable areas." Additionally, the Service recommends that the Project meet or exceed the raptor safe design standards described in the APLIC 2012 Collision Manual.	Comment noted. The language of applicant committed measure TWE-30 takes into consideration that site-specific engineering requirements may preclude the ability for certain elements of the project and ancillary facilities to be consistent with APLIC guidelines. Should the project be approved, full review of APLIC consistency will not be possible until final project siting and engineering are completed following the Record of Decision. Although they are not applicant-committed measures, new mitigation measures requiring that the project design be consistent with APLIC 2012 have been added to Section 3.7.6 and Table C.5-1.
U.S. Fish and Wildlife Service	556-1172	Page App C, C-17; Section C.2, Table C.2-1 Applicant committed design feature TWE-31 should include reference to consultation with the U.S. Fish and Wildlife Service under section 7 of the ESA.	TWE-31 was revised to say: Mitigation measures that will be developed during the consultation period with the BLM and the U. S. Fish and Wildlife Service under Section 7 of the ESA will be adhered to, along with mitigation developed in conjunction with state authorities.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1173	Page App C, C-18; Section C.2, Table C.2-1 Recommend that you avoid combining Design Features for raptors, T&E species, other sensitive species, and general wildlife into one (i.e. TWE-32). Greater sage-grouse require specific geographic and temporal buffers that are very different from those for raptors, T&E species, and other general wildlife.	Comment noted. Applicant-committed environmental protection measures were determined by the project proponent. Additional species-specific conservation measures are listed in Table C.5-1 (DEIS page C-121). Final general and species-specific avoidance, minimization, and mitigation measures will be mandated by the lead agencies via the ROD and be included in the TWE Biological Protection Plan, a component of the COM Plan developed prior to construction if the Project is approved.
U.S. Fish and Wildlife Service	556-1174	Page App C, C-24; Section C.3.1.3 Appendix B (Greater Sage-grouse Disturbance Guidelines) of the Colorado Greater Sage-Grouse Conservation Plan (2008) makes recommendations to protect GRSG habitat and avoid disturbance within GRSG seasonal habitats. It states (p. B-12), "Powerlines (transmission, service lines) – Whenever possible, avoid the construction of powerlines in lek habitat [0.6 mile]." For nesting, early-brood-rearing, summer-fall, and winter habitats it states (B-14), "Powerlines—If possible, powerlines should be avoided in these seasonal habitats." Nesting, early-brood-rearing, and summer-fall habitats are defined as the appropriate vegetation communities (sagebrush, wet meadows, etc.) within 4 miles of a lek (p. B-4). Thus, although not specifically listed as a NSU, CSU, or TL, the disturbance guidelines in the Colorado state plan are similar to those listed in C.3.1.1 for Wyoming.	Section C.3 was updated to include the Greater Sage-grouse Disturbance Guidelines of the Colorado Greater Sage-Grouse Conservation Plan (2008).
U.S. Fish and Wildlife Service	556-1175	Page App C, C-28; Section C.2, Table C.2-1 The Service acknowledges that TWE-32, TWE-33, and TWE-34 will be implemented to avoid and minimize potential impacts to federally listed species and migratory birds. TWE-34 should additionally include that construction within the vicinity of the newly located protected species would be halted and would reconvene when a biologist from the appropriate agency, after being contacted by the contractor, determines that the species would not be affected by continued construction.	The Applicant is considering whether to modify TWE-34 in accordance with this comment.
U.S. Fish and Wildlife Service	556-1176	Page App C, C-35 to C-37, Table C.3-8; Section C.3, Table C.3-8 Sage-grouse, greaterA No Surface Occupancy area will be established within 0.6 mile of sage-grouse leks. However, the agency preferred alternative alignment appears to be mapped less than 0.6 mile from the Elk Springs Draw lek, an active lek located within the Wolf Creek ferret reintroduction area. The agency preferred alternative also appears to travel less than 0.6 mile from 4 inactive leks, and within 0.1 mile from three of these. We recommend that the proposed alignment be micro-sited to avoid all leks by at least 0.6 mile, in keeping with Table C.3-8. Avoidance of leks will help to reduce the exposure of lekking and nesting grouse to raptors that could perch on transmission towers. Raptors can even perch on towers or H-frame supports with anti-perching devices, although with reduced frequency. Sage-grouse will likely also simply avoid transmission towers, tall structures, and other potential perch sites to some extent to reduce their exposure to avian predators. Areas avoided by grouse no longer provide suitable nesting, foraging, or sheltering habitats.	Thank you for your comment. Any final, approved alignment would be micro-sited to conform with current, applicable BLM RMP stipulations for spacing from active leks. Depending on timing of the associated RODs, these stipulations may include those developed as part of the ongoing greater-sage grouse amendments to BLM and USFS land use plans.
U.S. Fish and Wildlife Service	556-1177	Page App C, C-39; Section Table C.3-9, Little Snake FO Timing Restrictions, GRSG The BLM Little Snake OF RMP contains a Timing Limitation to protect lekking and nesting grouse from March 1 to June 30. It stipulates a CSU for "oil and gas operations and avoidance areas for other surface disturbing activities within a 4 mile radius of the perimeter of a lek. All surface disturbing activities will avoid only nesting and early brood-rearing habitat with the 4 mile radius of the lek during this time period." The "Timing" column in Table C.3-9 should be fixed and changed to "3/1 to 6/30."	The timing limitation dates for greater sage-grouse within the Little Snake FO was revised to say "3/1 to 6/30".
U.S. Fish and Wildlife Service	556-1178	Page App C, C-47; Section Table C.3-12, WRFO GRSG , NSU The WRFO RMP is currently being amended. We recommend noting that the proposed language in the current draft WRFO RMP amendment extends the lek NSO to 6 tenths of a mile. Similarly, there are newly proposed Timing Limitations identified in the draft WRFO RMP amendment.	The tables contained in Section C.3 identify the stipulations of adopted land use plans only. Proposed greater sage-grouse land use plan amendments that have not yet been approved were not included in this section because any decisions about their future adoption and application have not been finalized. Any approved alternative would adhere to current RMP stipulations that are in place for sage-grouse at the time of the TWE ROD. Note that additional mitigation measure SSWS-5 for greater sage-grouse and its habitat was augmented in the Final EIS.
U.S. Fish and Wildlife Service	556-1180	Page App C, Table C.5-1; Section C.5 Special Status Plant Species We recommend adding a mitigation measure to safeguard threatened and endangered plants during vegetation management activities. Vegetation removal, herbicide use, and OHV access should not be conducted around listed plants without first coordinating with BLM and FWS.	The requested mitigation has been added to Section 3.6.6.6 and Appendix C, Table C.5.
U.S. Fish and Wildlife Service	556-1181	Page App C, C-125; Section C.5, Table C.5-1 SSWS-5 states "To reduce impacts to greater sage-grouse from operation of the proposed Project, several design features specific to black-footed ferret would be implemented." The remainder of the mitigation measure discusses greater sage-grouse measures, and so it appears that the reference to black-footed ferret was unintentionally included (i.e. black-footed ferret has a similar mitigation measure SSWS-9). This measure also discusses marking guy wires within high quality greater sage-grouse habitat or using alternative structure types. The Service supports the use of alternate structure types to minimize effects to greater sage-grouse during operations of the Project.	Appendix C has been modified to address comment.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1182	Page App C, C-126; Section C.5, Table C.5-1 SSWS-5 should be edited to remove all referenced to black-footed ferret as it appears to be a measure specific to greater sage-grouse.	Text of Appendix C has been updated to address comment.
U.S. Fish and Wildlife Service	556-1183	Page App C, C-126; Section C.5, Table C.5-1 Measure SSWS-5a appears to address geographic buffers for greater sage-grouse leks, however there is no reference to this measure in the text of Section 3.8. Recommend that you incorporate the measure into the text so that the reader can understand under what circumstances it will apply.	Thank you for your comment. Mitigation measure SSWS-5 has been refined and augmented to include measures from SSWS-5a, which has been removed from Table C.5-1 of the FEIS. The text of Section 3.8 refers to measure SSWS-5, as appropriate.
U.S. Fish and Wildlife Service	556-1184	Page App C, C-127; Section C.5, Table C.5-1 SSWS-9 states that "TWE would be required to construct anti-perching devices and alternative structure types...near high quality black-footed ferret habitat...in consultation with the BLM, Western, and applicable state wildlife agencies." The Service would acknowledge the inclusion of our agency to the list of those that would be consulted about this measure.	Mitigation measure SSWS-9 described in Section 3.8.6 and summarized in Appendix C, Table C.5-1, has been revised to address this comment.
U.S. Fish and Wildlife Service	556-1185	Page App C, C-127; Section C.5, Table C.5-1 The * (asterisk) following SSWS-5A, SSWS-10, and SSWS-11 states that those mitigation measures will be applied only in the State of Utah. The Service recommends that these mitigation measures are valuable to the affected resource and should be applied throughout all appropriate lands affected by the Project, regardless of where those fall along the Project's length.	Thank you for your comment. For the FEIS, SSWS-5 has been revised and augmented and would apply across the entire GRSG analysis area. SSWS-10 applies to MSO, which only have potential to occur in the analysis area in Utah. SSWS-11 would apply to Canada lynx wherever they occur in the analysis area.
U.S. Fish and Wildlife Service	556-1186	Page App C, C-128; Section C.5, Table C.5-1 SSS-1 pertains to no new water use in areas that are hydrologically connected to streams containing Colorado River cutthroat trout and Bonneville cutthroat trout. The Project may adversely affect other federally listed aquatic species through depletions (Bonytail, Colorado pikeminnow, Humpback chub, and Razorback sucker). The Service recommends that this mitigation measure additionally consider those species or that an additional measure be created to include those species.	The Recovery Implementation Program for Endangered Fish Species in the Upper Colorado River Basin, as discussed in Section 3.10.6.2, provides protection to the four endangered fish species from water depletions. Therefore, an additional mitigation measure similar to SSS-1 is not needed.
U.S. Fish and Wildlife Service	556-1187	Page App D PDTR, 5-9; Section 2.3.1 The Service acknowledges the discussion in section 2.3.1 regarding the Level 1, Level 2, and Level 3 Co-location distances. This information will help to inform the public about parallel line minimum separation distances with respect to sensitive resources on the landscape.	Thank you for your comment. Chapter 2 of the Final EIS describes the updated separation criteria considered in the Final EIS, which is a general minimum offset of 250 feet from existing transmission lines (decreased from a general 1,500 feet with 250 feet only considered in locations with specific resource or management constraints in the Draft EIS).
U.S. Fish and Wildlife Service	556-1188	Page App G; Section Table G-1 The Western prairie fringed orchid is a federally threatened plant species that occurs outside of the Project area, but may be affected by the Project due to depletions of the Platte River basin. The Service recommends that this species be added to the table of special status plant species that may be affected by the Project.	Potential Project-related impacts to the Western prairie fringed orchid resulting from Platte River water depletions have been added to sections 3.6.4.1 and 3.6.6.3 of the FEIS.
U.S. Fish and Wildlife Service	556-1189	Page App G, G-6; Section Table G-1 Hamilton milkvetch: Mistakenly noted in Appendix G as Federally Endangered In Utah. It is not a federally listed species.	The status of this species has been corrected in Appendix G and the EIS.
U.S. Fish and Wildlife Service	556-1205	Page App G, G-18; Section Table G-1 The Las Vegas buckwheat is a Federal candidate species that may be affected by the Project.	The Las Vegas Buckwheat has been identified as a federal candidate species in the EIS. It has been carried forward for detailed analysis, and analyzed for impacts. Mitigation for federally listed species has been identified in the document as SS-1, SS-3, and SS-4.
U.S. Fish and Wildlife Service	556-1206	Page App G, G-29; Section Table G-1 The blowout penstemon is a federally endangered plant species that occurs in sand-dune blowout habitats. Based on the information included in the table about this species and the proposed Project alignment, it is unlikely that the Project would affect blowout penstemon habitat. The Service agrees that this species can be eliminated from further detailed analysis in the EIS.	Thank you for your comment. The blowout penstemon has been eliminated from detailed analysis.
U.S. Fish and Wildlife Service	556-1207	Page App G, G-29 to G-50 ; Section Table G-2 The Migratory Bird Treaty Act serves to protect migratory birds, and so each of the birds assessed in the special status wildlife table should also be described as being protected by the MBTA (i.e. Federal protection).	Appendix G has been updated to address comment.
U.S. Fish and Wildlife Service	556-1208	Page App G, G-29 to G-50 ; Section Table G-2 The Migratory Bird Treaty Act serves to protect migratory birds, and so each of the birds assessed in the special status wildlife table should also be described as being protected by the MBTA (i.e. Federal protection).	Appendix G Table G-2 has been modified to address this comment. For special status bird species that also receive protection under the MBTA, the acronym "MBTA" has been added to the Status column.
U.S. Fish and Wildlife Service	556-1209	Page App G, G-43 and G-44; Section Table G-2 The bald eagle and the golden eagle should additionally be described as being protected by the Bald and Golden Eagle Protection Act (i.e. Federal protection) in the status column of this table.	Appendix G has been modified to address comment.
U.S. Fish and Wildlife Service	556-1210	Page App G-49, 3.8-18; Section Appendix G, 3.8.4.1 Update language regarding critical habitat for the southwestern willow flycatcher. Redesignation was finalized in 2012.	Appendix G of the FEIS has been updated to address comment.

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1211	Page App G, G-54; Section Table G-2 The Preble's meadow jumping mouse is a federally threatened mouse that occurs along the Front Range of Colorado and north in the foothills of southeastern Wyoming. Based on the information included in the table about this species, and the proposed Project alignment, it is unlikely that the Project would affect the Preble's meadow jumping mouse. The Service agrees that this species can be eliminated from further detailed analysis in the EIS.	Thank you for your comment.
U.S. Fish and Wildlife Service	556-1212	Page App G, G-57; Section Appendix G The information regarding the relict leopard frog appears to be incorrect. The relict leopard frog has been reintroduced to and now also occurs on BLM lands, and does occur in springs within the NRA. We recommend updating the "potential for occurrence" section and deleting the statement in the "eliminated from detailed analysis" section.	Occurrence information was updated for the relict leopard frog in Appendix G, Table G-3. This species also was added to the affected environment and impact sections for Region IV, Sections 3.10.4.2 and 3.10.6.6, respectively.
U.S. Fish and Wildlife Service	556-1213	Page App G, G-57; Section Table G-3 The Wyoming Toad is a federally endangered amphibian that occurs in very limited habitats in southeastern Wyoming, and is not listed in this table. It is unlikely that the Project would affect the Wyoming toad because the proposed Project alignment occurs outside of the species' range.	Because the Project area is outside the species' range, it has not been included in the EIS analyses.
U.S. Fish and Wildlife Service	556-1214	Page App G, G-58 and G-60; Section Table G-3 The federally endangered Colorado pikeminnow, Bonytail, Humpback chub, and Razorback sucker may have some potential for occurrence within the Project area, but they may also be affected by depletions from the Colorado River basin as a result of the Project. These species also have designated critical habitat that may be impacted by depletions of the Colorado River basin.	Potential effects of water depletions on the federally endangered fish species are discussed in the impact discussions in Sections 3.10.6.3 (Region I), 3.10.6.4 (Region II), and 3.10.6.5 (Region III).
U.S. Fish and Wildlife Service	556-1307	Clay Phacelia conservation measures ¹ . Avoid suitable habitat (as modeled). 2. If avoidance of suitable habitat is not possible disturbance will not exceed 10% cumulatively. Mitigation measures will be necessary for any disturbance in clay phacelia suitable habitat. 3. No roads within 650 feet buffer (200 m) of suitable clay phacelia habitat. 4. No vegetation treatments, site preparation in suitable clay phacelia habitat; 200 feet buffer for mechanical vegetation treatments, 2500 feet for herbicide treatments, no aerial herbicide treatments. In lieu of these buffers a vegetation management plan that outlines methods for control of invasive, exotic species in greater detail while protecting clay phacelia and its habitat can be developed. 5. No ground disturbance such as poles, pads, towers etc. in suitable clay phacelia habitat or within 650 feet buffer. 6. Wire to be strung between towers aerially with little to no ground disturbance in clay phacelia suitable habitat. 7. NO new development in known occupied sites or within 650 feet (this would preclude our ability to recover the species). Existing sites need to be surveyed to determine site boundaries prior to development site selection if development is to occur close to the 650 feet buffer area. 8. Once the footprint of the development is determined then clearance surveys should be conducted prior to construction to determine presence where development will take place in suitable clay phacelia habitat. 9. All project employees, especially contractors, brought onsite for the duration of a project will be informed of the occurrence of clay phacelia in the project area and of the endangered status of the species. All project employees shall be advised as to the potential penalties (up to \$200,000 in fines and one year in prison) for damaging, destroying or removing and possessing a plant species on Federal lands listed under the Act. A qualified biologist is required to perform this instruction. 10. A qualified botanist should be on-site during all ground disturbing activities to ensure plants are identified and avoided in suitable habitat. 11. Transmission lines should be minimally spaced and use the same corridor to prevent further fragmentation in suitable habitat. 12. Develop a wildfire mitigation plan to prevent suitable habitat from being impacted by emergency fire operations in the event of a wildfire ¹³ . All equipment should be cleaned and inspected for presence of invasive, non-native plants and seeds before being brought in suitable habitat.	Clay phacelia conservation measures will be finalized in the ESA Section 7 consultation.
U.S. Fish and Wildlife Service	556-1308	12. Develop a wildfire mitigation plan to prevent suitable habitat from being impacted by emergency fire operations in the event of a wildfire.	A wildfire section was added to the FEIS as Section 3.21 to provide more detail and analysis on the wildfire risk associated with the proposed Project (Section 3.21). A fire protection plan will be developed as part of TransWest's Construction, Operation, and Maintenance Plan. As appropriate, specific requirements of the fire protection plan were outlined as mitigation in the wildfire section. See Appendix D, part 1 and 2 of the Final EIS for TWE's committed environmental mitigation measures related to fire protection (No-64).

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U.S. Fish and Wildlife Service	556-1310	Compensatory mitigation If the above [clay phacelia conservation measures included in USFWS comment letter] cannot be followed and activity, development or ground disturbance (even temporarily) occurs in clay phacelia modeled habitat then the following compensatory mitigation measures shall be considered: 1. Acquisition of occupied habitat and placement into permanent conservation 2. Successful introduction of clay phacelia into new sites on USFS land (up to 5 sites where presence of flowering adults occurs for a period of 5 years) 3. Fencing of existing and suitable sites to protect from herbivores 4. Contribution to a fund for ongoing management of populations and protection (fencing, caging, control of herbivores) of occupied habitat The following measures will be considered and weighted into the final mitigation calculation: 1. Amount of modeled habitat disturbed and proximity to occupied habitat 2. Type of disturbance: permanent development, temporary development, temporary construction activity, intermittent activity 3. Amount of time of disturbance: 1 month or less, up to 6 months, up to 1 year, more than 1 year or continuous 4. Habitat fragmentation: Location and spacing of transmission lines from each other and other development	Determining if compensatory mitigation for Clay Phacelia is necessary and appropriate will be part of the ESA Section 7 consultation.
U.S. Fish and Wildlife Service	556-1312	The Service recommends that the applicant develop a bird and bat conservation strategy (BBCS) as a stand-alone document appended to the FEIS that includes an impact assessment, avoidance and minimization measures, and compensatory mitigation for residual effects to migratory bird habitats.	TransWest has committed to developing an Avian Protection Plan in coordination with the USFWS that includes discussion of the recommended topics. This information is presented in Section 3.7.4.3 (DEIS page 3.7-8).
U.S. Fish and Wildlife Service	556-1313	2) To facilitate a more manageable section 7 consultation, and in the absence of species surveys, we recommend that TWE conduct an exercise to ground-truth potential habitat prior to submittal of a BA.	Survey requirements will be determined during ESA Section 7 Consultation.
U.S. Fish and Wildlife Service	556-973	Page General; Section General There does not appear to be a discussion of the interagency team's role in working through issues related to the Project or the consultation agreement that was signed in 2012 that established the roles of the various Federal agencies involved in guiding, permitting, and consulting on the Project. The Service recommends that the EIS include a section describing coordination and consultation to date for the Project.	Chapter 6 of the Final EIS includes updated information regarding consultation and coordination.
U.S. Fish and Wildlife Service	556-974	Page General; Section General Everywhere in the DEIS where there is a reference to the APLIC electrocutions manual (APLIC 2006), there should be a reference also to the APLIC collisions manual (APLIC 2012) along with a commitment to implement all provisions from the APLIC 2012 manual that apply to this Project	Text has been modified to reference the APLIC collision manual (APLIC 2012), as appropriate, throughout relevant portions of the FEIS. Implementation of the measures identified in the APLIC collisions manual have been included as additional mitigation in Chapters 3.7, 3.8, and Appendix C.
U.S. Fish and Wildlife Service	556-975	Page General; Section General The DEIS fails to reference or address any of the State Wildlife Action Plans (SWAPs) for the four affected states. The SWAPs provide information about both Species and Habitats of Greatest Conservation Need in each of these states. All relevant points from the SWAPs for this project should be referenced in the DEIS.	The State Wildlife Action Plans are referenced in Section 3.9.4.2, Fish. Additional reference to SWAPs will be included in Section 3.7.2 Data Sources.
U.S. Fish and Wildlife Service	556-976	Page ES-5; Section ES.2.1.1 In Design Options, the DEIS defines Design Option 2 and Design Option 3. We recommend that the EIS clarify this section by including reference to the proposed activity as Design Option 1.	Design Option 1 was proposed by TransWest as a connection to the Aeolus substation in Wyoming; however, that has been removed from further consideration at the request of TransWest.
U.S. Fish and Wildlife Service	556-977	Page ES-7; Section ES.2.1.6 We recommend that the purpose and need for ground electrode systems be defined here.	Section ES.2.1.6 of the Draft EIS summarizes the function of the ground electrode system as outlined in Section 2.4.3.2 of the DEIS.
U.S. Fish and Wildlife Service	556-978	Page ES-15; Section ES.3.4 The Water Resources section of the ES for the DEIS states that "Because existing water rights (current depletion) would be utilized, no new impacts to other water users or the water source would be anticipated." The Endangered Species Act requires Federal agencies to ensure that projects they fund or carry out are not likely to jeopardize the continued existence of listed species or destroy or adversely modify their designated critical habitat. All activities that have an impact on water in the North Platte and the Colorado River basins have the potential for adverse effects to listed species or their designated critical habitat. We recommend that the applicant determine whether the use of "existing water rights" has been consulted on with the Service.	ESA Consultation with the USFWS is discussed in the Special Status Wildlife Species and Special Status Aquatic Species sections (sections 3.8 and 3.10, respectively, of the Draft EIS). The Final EIS has been revised to clearly indicate the potential Section 7 requirements associated with depletions from the Platte River and Upper Colorado River Basins that may not have been previously consulted on. A consultation with the USFWS is discussed in the Special Status Wildlife Species and Special Status Aquatic Species sections (sections 3.8 and 3.10, respectively).
U.S. Fish and Wildlife Service	556-979	Page ES-15; Section ES.3.5 The Vegetation section of the ES for the DEIS states that "The removal of woody vegetation over 6 feet in height could result in changes in vegetation community structure." This is the first mention in the DEIS of the removal of woody vegetation over 6 feet in height. We recommend justification for the removal of vegetation over 6-feet tall, particularly because the height of the transmission structures allows for greater than 50-feet of clearance beneath the sag of the cables.	The removal of vegetation over 6 ft in height is the maximum height in the ROW for the Level 1 vegetation management level as described in the PDTR (Appendix D). For the DEIS analysis, it was assumed that vegetation management Level 1 would be applied to the entire ROW. For the FEIS, the analysis has been refined to include Level 2 and Level 3 vegetation management, which would be applied in limited areas (typically Visual Class II, and III, riparian crossings, and areas of sensitive wildlife habitats susceptible to forest fragmentation impacts) and is described in the relevant resource sections. Revised analysis is in Section 3.5.6. Justification for the six feet height requirement for the Level 1 vegetation management level is provided in the PDTR, Section 3.6.2.2. The Executive Summary has been updated to read: "The removal of woody vegetation over 6 feet in height (Level 1 – Standard ROW Vegetation Management as identified in the Appendix D, PDTR) could result in changes in vegetation community structure."

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Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-980	Page ES-16; Section ES.3.7The Wildlife section of the ES for the DEIS states that "TransWest also has committed to implementing raptor seasonal timing restrictions in applicable areas." The Service recommends seasonal restrictions outside of the nesting season for all migratory birds, and we have specific guidance regarding seasonal and spatial buffers for nesting raptors. Additionally, the MBTA and Eagle Act apply to all lands, regardless of ownership. We recommend the above statement be reworded to say "TransWest also has committed to implementing appropriate timing restrictions for project activities that are planned within the vicinity of nesting birds."	Sections 3.7, 3.8, and the Executive Summary have been modified to present general breeding seasons for a variety of raptors and other migratory birds. Appendix C presents applicable mitigation measures to protect nesting birds in the vicinity of Project activities. TransWest has also committed to implementing raptor and migratory bird seasonal restrictions in the vicinity of nesting birds.
U.S. Fish and Wildlife Service	556-981	Page ES-16; Section ES.3.7 The wildlife section of the ES for the DEIS states the 2006 APLIC guidelines would be followed to minimize potential operation-related impacts to wildlife. We recommend the EIS also include reference to the 2012 Collision Manual, and make a commitment in the EIS to implement any and all measures in that document that apply to this Project.	Adherence to the avian protection measures identified in the APLIC collision manual (APLIC 2012) have been included as additional mitigation in relevant sections of the FEIS. The Applicant is considering whether to adopt the APLIC recommendations as design features or applicant-committed environmental protection measures.
U.S. Fish and Wildlife Service	556-982	Page ES-17; Section ES.3.8 Please define the "Special Status Wildlife Analysis Area" used here.	FEIS Section ES 3.8 (DEIS page ES-17) has been modified to address comment.
U.S. Fish and Wildlife Service	556-983	Page ES-17; Section ES.3.8 The special status wildlife species portion of the ES for the DEIS states "Construction impacts account for all disturbances caused during construction of the proposed Project, including vegetation removal, increased human activity, and increased noise levels." We recommend rephrasing this sentence to say "Construction affects, such as vegetation removal, increased human activity, and increased noise levels, may affect special status wildlife species."	Text in the Executive Summary has been modified to address comment.
U.S. Fish and Wildlife Service	556-986	Page 41283; Section 1.4.1 In this section, the DEIS refers to the U.S. Department of the Interior as (DOI) and as the USDI. The abbreviations and acronyms portion of the DEIS defines the U.S. Department of the Interior as USDI, though people employed by this branch refer to it as DOI. We recommend consistency throughout the document and use of the preferred DOI.	The acronym in Section 1.4.1 will be change to remain consistent with the remainder of the EIS: the U.S. Department of the Interior will be referred to as USDI.
U.S. Fish and Wildlife Service	556-987	Page 41306; Section 2.1.1 The Service acknowledges the discussion regarding the independent utility of this project with regard to existing and proposed renewable and non-renewable power generation sources in Wyoming.	Thank you for your comment.
U.S. Fish and Wildlife Service	556-988	Page 2-3; Section 2.1.2 We recommend that a "Design Option 1" be defined here prior to describing Design Options 2 and 3.	Design Option 1 was proposed by TransWest to provide connection to the Aeolus substation in Wyoming; however, it has been removed from consideration at the request of TransWest.
U.S. Fish and Wildlife Service	556-989	Page2-7; Section 2.2 We acknowledge the discussion regarding optimum spacing of parallel transmission lines (i.e. no closer than 1,500 feet from 345kV and higher and 250 feet from less than 345 Kv lines). The Service recommends that the spacing of the Project from existing or proposed transmission lines remain flexible with regard to avoiding and minimizing impacts to sensitive and listed species' habitats.	Section 2.2 of the Final EIS provides detail on updated separation criteria considered proposed by TransWest. This includes a general minimum offset of 250 feet from existing transmission lines (decreased from a general minimum offset of 1,500 feet described in the Draft EIS). However, this distance will remain flexible to allow for avoidance or minimization of resources as more information becomes available through pre-construction surveys.
U.S. Fish and Wildlife Service	556-990	Page 2-16, 2-18, 3.5-34; Section 2.4.2.1, 3.5.6.2We recommend reducing the amount of blading at tower sites and tension/stringing/pulling areas by taking a drive and crush approach rather than blading to reduce environmental impacts.	TransWest has indicated that clearing and blading will be performed only to the extent necessary to perform safe construction activities. Where terrain, soil, and vegetative cover conditions are suitable, drive-and-crush practices would be implemented. Discussion of this practice was included in Sections 2.4.2.1 and 3.5.6.2 of the Final EIS.
U.S. Fish and Wildlife Service	556-991	Page 2-17; Section Figure 2-10 The Service supports the use of transmission structures that do not include guy wires, particularly in areas where guy wires may pose an additional collision risk to low-flying birds. In areas where increased predation risk may adversely affect a federally listed species, we recommend the applicant utilize tubular steel towers with perch deterrents to limit perching opportunities for raptors.	Thank you for your comment. Use of tubular steel towers and perch discouragers were included in the DEIS as potential mitigation for impacts to greater sage-grouse and Utah prairie dog. This measure has been added to apply to the desert tortoise as well.
U.S. Fish and Wildlife Service	556-992	Page 2-24; Section 2.4.3.1 The Northern Terminal description contains reference to the possibility for interconnection between the Energy Gateway West and Energy Gateway South 500 kV transmission lines. We recommend clarification for the purpose and need for such interconnections.	The suggested clarification was added to Section 2.4.3.1 of the Final EIS.
U.S. Fish and Wildlife Service	556-993	Page 2-32; Section Fig. 2-21. The Little Snake (east and west) ground electrode areas in Moffat County, Colorado are in important breeding and priority habitat for the greater sage-grouse. We recommend selecting different ground electrode sites outside of priority habitat. At a minimum, we recommend locating any associated buildings, fences, access roads, and above-ground electrical lines well away from all sage-grouse leks (> 0.6 mile). The Little Snake East ground electrode site looks particularly problematic for sage-grouse due to its proximity to three GRGS leks.	Comment noted. BLM and the applicant have agreed to remove the Little Snake ground electrode sites from further analysis.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-994	Page 2-39; Section 2.5.1.1 The Service acknowledges that the Agency Preferred alternative is I-D, which parallels existing disturbance for much of its alignment. However, we are concerned that Alternative I-D creates a new disturbance corridor 2-5 miles west of and parallel to Hwy 789. We request that BLM further consider the potential impacts of this alternative and suggest that the preferred alternative be refined to further limit impacts to wildlife and other important features.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS has been further refined from that identified in the Draft EIS and was chosen to meet the lead agencies' purpose and need and Applicant objectives while balancing federal land managers' multiple use mandate.
U.S. Fish and Wildlife Service	556-996	Page Fig. 2-25., 2-41; Section 2.5.1.1. Colorado Parks and Wildlife obtained a conservation easement over portions of the Tuttle Ranch, located east of the town of Elk Springs in Moffat County, Colorado. The easement was obtained, in part, using funding from the U.S. Fish and Wildlife Service. Among other things, the easement protects habitat for the greater sage-grouse and various white-tailed prairie dog towns. At some future point, the prairie dog towns could provide excellent habitat for black-footed ferrets. As stated previously, we recommend that the transmission line be routed around this conservation easement. Tuttle Easement Micro-siting Option 2 or 3 would accomplish this. If the transmission line was placed as close as is feasible to Highway 40, habitat fragmentation would be minimized.	Thank you for your comment.
U.S. Fish and Wildlife Service	556-997	Page 2-42; Section 2.5.1.1 The Service supports the ground electrode system alternative facilities that result in the fewest effects to habitat for federally listed species, migratory birds, and bald and golden eagles.	Thank you for your comment.
U.S. Fish and Wildlife Service	556-998	Page 2-49; Section 2.5.1.3 For access roads, please break down the number of acres and miles of new disturbance, grading/improved roads, and existing roads with no improvement.	Existing roads that would be utilized with no upgrades are identified as backbone roads. All roads that would be built or upgraded are considered as one category and disclosed as new access road disturbance in both the Draft and Final EISs.
U.S. Fish and Wildlife Service	556-999	Page 2-56; Section 2.8.1 The parameter for defining priorities for trade-offs between resources of concern focus on a subset of candidate and listed species and migratory birds that may occur in the Project area (parameter 3). We recommend further clarification regarding why and how these resources were prioritized.	Thank you for your comment. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input such as yours. This agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Chapter 2 of the Final EIS has been revised to include additional detail regarding how criteria were weighed in identifying the Agency Preferred Alternative.
U.S. Navy Region Southwest	555-686	Page ES-2, Figure ES-1 Nellis Air Force base is concerned with the alignment of the Transwest Express Transmission Line. In the area noted as "Areas of Concern" on the attached map we need to have, for all structures, Latitude and Longitude, Heights (MSL and AGL). This information is needed before we do any analysis on the proposed alignment by our TERPS office. There is serious concern for the impact on Nellis AFB approaches and departures. Without this information we need to strongly recommend opposition to these project segments. See attached map.	This information request has been forwarded to TransWest and the level of detail you request is expected to be included in TransWest's Plan of Development that will support the Record of Decision (ROD) for the Project.
U.S. Navy Region Southwest	555-687	Transmission infrastructure built on the NTTR within federally designated utility corridors exceeding a height of 100 ft AGL will negatively impact military flight operations. Low-level military training routes are located above the designated corridor on the NTTR. Further, all stanchions, poles, and other structures built to a height of 100 ft AGL or greater must be properly lighted and marked on FAA flight charts, sectionals, maps, and other appropriate navigation reference material to ensure flight safety and proper VFR/IFR de-confliction.	The details provided in this comment were incorporated into Section 3.16.
University of Utah	105-10	A final issue is radio interference. We are experimenting with a new technique for detecting cosmic rays that uses radar. Any additional radio emissions in the 10-100 MHz band will interfere with these observations.	High voltage transmission lines, including HVDC lines, produce broad spectrum radio frequency noise. A specific transmission line will not have a given radio frequency but studies indicate that the interference effects tend to stay below 30 MHz (Crane 2010, CIGRE 1996). Furthermore, design specifications include the use of materials to minimize interference.
University of Utah	105-8	The major issue the Telescope Array has with additional power lines in the area of our array is access to our distributed components. We do not have surface access to most of our components. Instead they were put into place by helicopter. Helicopters are also used for retrieving detectors when they need to be replaced and for when they are eventually removed. At this time we can work around existing power lines but as these lines proliferate some of our detectors will end up no longer accessible by helicopter. Our preferred mitigation would be for whomever's line cuts off our access to pay to have a surface access route surveyed and staked for our eventual use.	Section 3.14, Land Use, was augmented to include a discussion of the telescope array project and potential conflicts. Mitigation measure LU-1 has been added to address concerns regarding loss of access to valid existing uses.
University of Utah	105-9	Another issue we have is artificial lights. Part of our array is optical detector watching the sky over the array. We picked this site because of the lack of artificial lights which would interfere with our observations. We worry about any new lights being put on structures near our array.	TransWest has indicated that the alternative that would be co-located with the existing IPP Project would be constructed with similar structure heights, and the DOD has commented that structure heights that do not exceed a height greater than 10-feet above the existing, unlighted structures would not require lighting. This information has been added to Section 3.16.6.5.
USDOJ - CUP Completion Act Office	138-117	It is obvious that much work and thought has gone into the preparation of this EIS.	Thank you for your comment.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
USEPA - Region 8	556-984	Page ES-18; Section ES.3.9 The aquatic biological resources section of the ES for the DEIS states "Stream crossings would alter bottom substrates, and construction at stream crossings would remove riparian vegetation that provides cover for fish, shading, bank stability, and increased food and nutrient supply." Please clarify how these impacts may affect biological resources.	Additional text was added to Section ES 3.9 to clarify effects of habitat loss or disturbance on aquatic species.
USEPA - Region 8	558-1596	Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information present, the EPA is rating the Agency Preferred Alternative an "EC-1" (Environmental Concerns - Adequate).	Thank you for your comment.
USEPA - Region 8	558-1598	Appendix C detailed five different sets, some with subsets, of mitigation measures and best management practices (BMPs) for the project-(1) The Westwide Energy Corridor Final Programmatic EIS BMPs, (2) Applicant-committed Design Features, (3) State and BLM Land Use Stipulations for Transmission ROWs, (4) Applicable USFS Standards and Guidelines and (5) Additional Mitigation Measures Prescribed for the TWE Project. The lists contain overlapping measures and practices, some more protective than others. We were not able to determine which of the various measures and BMPs would be applicable, or whether applicability varies by land ownership along the corridor. Clarifying how and where mitigation and BMPs will be applied will assist the decision-maker and the public in understanding the potential environmental impacts associated with this project. We offer the following recommendations to improve the clarity of this important section: - Reorganize this appendix by resource so that the reader can easily determine what mitigation measures will be used to protect specific resources, such as water and air - Reconcile the overlapping measures by explaining which measures will be implemented - Specify whether each mitigation measure and BMP applies throughout the corridor or only to federal lands or to tribal, state and private lands. When there are different protection levels among the various BMPs, the EPA recommends using the most environmentally protective standards or providing a rationale for why a less stringent measure was selected.	Appendix C contains separate sections for the West Wide Energy Corridor (WVEC) Programmatic EIS best management practices (BMPs), TWE Applicant-committed Design Features (DFs), State, BLM and USFS Land Use Stipulations for Transmission ROWs, and additional mitigation measures prescribed for the TWE Project because each are applied in different circumstances. The WVEC BMPs are practicable means to avoid or minimize environmental harm from future project development and were developed for application in all eleven Western states containing WVEC corridors. Similarly, the TWE applicant-committed design features (DFs) were developed with an understanding of the multi-regional interstate nature of the proposed Project. Therefore, it is appropriate for these two types of measures to be applied throughout the Project area. They are presented separately in Appendix C because WVEC BMPs are mandatory for energy projects proposed within the Section 368 corridors and cannot be modified from their original verbiage, whereas the DFs are elements to which TWE has voluntarily committed to further reduce project impacts and can be revised based on Draft EIS public comment. State, BLM and USFS land use plan stipulations were developed by regional/local agencies to address area-specific resources issues and may not be appropriate for application throughout the Project area. Therefore, these stipulations are only applied in the area for which they were developed (although, the protections from some land use plans may be applied to the entire project area as mitigation - see below). Because of the regional application of these measures, they are organized and presented by the area in which they would apply. Mitigation measures are presented separately because these measures are neither required nor applicant-committed but are measures proposed to further reduce residual effects; the Project Record of Decision (ROD) will document which of these measures are adopted. In an EIS, all "relevant, reasonable mitigation measures that could improve the project are to be identified," even if they are outside the jurisdiction of the agency (see Question 19b, CEQ, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, March 23, 1981). Therefore, as discussed above, these measures may propose application of the protections of a land use plan to the entire Project area, or they may propose stipulations beyond those contained in any applicable land use plans. All proposed mitigation, unless otherwise specified in the measure, applies to the entire Project, including private lands. Tribal entities or private landowners may, however, require compliance with additional stipulations beyond what is set forth in Appendix C. Per BLM IM 2013-142 and Interim Policy, Draft - Regional Mitigation Manual Section – 1794, for management of mitigation on non-BLM-managed lands, the BLM should obtain written assurances from the relevant land management agency or surface owner and the authorization holder that mitigation conducted on those lands is agreed to and will receive adequate management, protection, and site access for monitoring during the expected lifetime of the land-use authorization and its associated impacts. These assurances should be in the form of enforceable, binding agreements between private parties and the BLM or similarly detailed commitments (e.g., memoranda of understanding, cooperative agreements) between other federal agencies and the BLM. The introduction to Appendix C was expanded to further explain how these measures are applied.
USEPA - Region 8	558-1600	The EPA also recommends that the project applicant consider adopting the same environmental protection standards and mitigation measures throughout the alignment unless a non-federal land owner objects to a specific measure.	The WVEC BMPs (Section C.1) were developed for application in all eleven Western states containing WVEC corridors. Similarly, the TWE applicant-committed design features (DFs; Section C.2) were developed with an understanding of multi-regional interstate nature of the proposed project. Therefore it is appropriate for these two types of measures to be applied throughout the project area. State, BLM and USFS land use plan stipulations (Section C.3 and C.4) were developed by regional/local agencies to address area-specific resources issues, and may not be appropriate for application throughout the project area. Therefore, these stipulations are only applied in the area for which they were developed (although, the protections from some land use plans may be applied to the entire project area as mitigation, see below). All proposed mitigation (Section C.5), unless otherwise specified in the measure, applies to the entire project, including private lands. Tribal entities or private landowners may, however, require compliance with additional stipulations beyond what is set forth in Appendix C. Per BLM IM 2013-142 and Interim Policy, Draft - Regional Mitigation Manual Section – 1794, for management of mitigation on non-BLM-managed lands, the BLM should obtain written assurances from the relevant land management agency or surface owner and the authorization holder that mitigation conducted on those lands is agreed to and will receive adequate management, protection, and site access for monitoring during the expected lifetime of the land-use authorization and its associated impacts. These assurances should be in the form of enforceable, binding agreements between private parties and the BLM or similarly detailed commitments (e.g., memoranda of understanding, cooperative agreements) between the Federal agencies and the BLM. The introduction to Appendix C in the Final EIS will be revised to further explain how these measures are applied.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
USEPA - Region 8	558-1601	The Draft EIS cites Executive Order 11990 (Protection of Wetlands) in Table 3.5-1, but does not discuss how the agencies will implement the Order, including the requirement to ensure mitigation of unavoidable impacts to all wetlands and waters of the U.S. The EPA recommends that the Final EIS address this issue.	Mitigation measure WET-1 requires wetland surveys to be conducted to identify wetlands, and water's of the U.S. in disturbance areas. WET-2 requires that consultation with the USACE and EPA occur for any features identified as jurisdictional during surveys. Any necessary mitigation for wetlands and water's of the U.S. will be determined during the USACE consultation process.
USEPA - Region 8	558-1602	Please note that crossings of water of the U.S. may trigger the need for a Clean Water Act (CWA) Section 404 permit. The type of permit will depend on the number of crossings on the same waterbody and the extent of disturbance. The CW A 404 permits on tribal lands will also require a CW A Section 401 water quality certification from the EPA's regional office.	A discussion of CWA 404 permits has been included in Section 3.4.6.3 of the Final EIS.
USEPA - Region 8	558-1603	Table 3.4-3 lists impaired water bodies, but designated uses are not described .. This is important because there is the potential, for example, that additional sedimentation could impact drinking water resources. The EPA recommends adding the designated use of the listed water bodies to this table and indicating whether these uses will be adversely affected by the project.	Designated uses will be added to Table 3.4-3 of the Final EIS.
USEPA - Region 8	558-1604	We understand that the project proponent has not indicated a need for man camps. However, the Draft EIS states that housing in Central Utah is limited and the availability of temporary housing, especially in Lincoln County, Nevada, is constrained and distant. The EPA recommends that the project applicant make a commitment in their COM Plan to site and design temporary lodging facilities with waste handling practices that ensure protection of surface water and groundwater if they determine that man camps are needed.	No temporary worker housing facilities are proposed by the proponent at the present time. The agency's comment has been noted and documented in the administrative record associated with this EIS. This comment has also been passed on to the proponent.
USEPA - Region 8	558-1605	Our review found an inaccuracy in the data in Table 3.1-1, National and State Ambient Air Quality Standards, (pg. 3.1-1). The national ozone standards are now 0.075 parts per million (ppm), instead of 0.08 ppm. The EPA recommends updating the table with the most recent criteria found at http://www.epa.gov/air/criteria.html .	Table 3.1-1 was corrected.
USEPA - Region 8	558-1606	We also note the Draft EIS incorrectly lists the conformity thresholds for Clark County, Nevada (pg. 3.1-22). The EPA recommends revising the text to correct the conformity threshold information as follows: - Conformity Thresholds-100 tons per year for NOx, CO, VOC, and SOx; 70 tons per year for PM10.	The noted correction was made.
Utah Associated Municipal Power Systems	561-1239	However, the DEIS discusses the use of anti-perching devices on transmission structures as benefitting greater sage-grouse population by reducing predation by avian species perching on transmission structures. UAMPS is unaware of any scientific literature that supports the assertion that the installation of anti-perching devices reduce predation of greater sage-grouse. UAMPS disagrees with the ELM's assertion that anti-perching devices are beneficial in decreasing predation and the premise that such devices should be considered a form of mitigation.	Thank you for your comment. The text of the FEIS has been updated to reflect that current scientific literature does not support a direct link between perch discouragers and a reduction in avian predation of sage-grouse. Nonetheless, the use of perch discouragers has been reviewed by and continues to be recommended as applicable mitigation by the agencies.
Utah Associated Municipal Power Systems	561-1241	The DEIS lacks adequate information for the public to meaningfully comment on the proposed routing alternatives. A 2-mile transmission corridor is too broad of an area for the public to provide meaningful comments, because the impacts to such a wide area are too speculative. For example, the DEIS references locating access roads within the 2-mile corridor "to the extent practicable." The lack of specificity created by analyzing the Project's impacts within 2-mile corridor makes it near to impossible for the public to understand the true impacts that are likely to occur should the Project be built. NEPA and its implementing regulations dictate that the direct effects from the Project, such as the construction of access roads, be identified with reasonable specificity so the significance of those impacts be disclosed and commented on by the public.	The approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach.
Utah Associated Municipal Power Systems	561-1242	As a customer of WAPA, UAMPS generally supports the proposed program updates to the Transmission Infrastructure Project (TIP) that WAPA is currently seeking comment.(1) In particular, UAMPS supports utilization of principles to ensure that "(1) that the Program is a separate and distinct from Western's power marketing function, and (2) that each eligible TIP project stands on its own for repayment purposes." However, UAMPS, as a beneficiary of WAPA's power marketing function, must continue to highlight its concern that WAPA ensure that its involvement in the TIP and in particular this Project in no way negatively impacts UAMPS as a WAPA customer. In addition, WAPA must certify that the project is in the public interest and will not adversely impact system reliability or operations in order to participate in the Project. The deficiencies in this NEPA document described above make it impossible for WAPA to undertake the required decision-making process to determine whether the Project is in the public interest or whether the Project will adversely impact system reliability or operations. Consequently, these inadequacies must be corrected so W APA can make an informed decision from this NEPA document as to whether it should partially finance or own the Project.	The concerns you expressed in your letter (based on the comments you reference as "described above") are associated with the Draft EIS analysis of a 2-mile corridor within which the transmission reference line is located. This approach for planning and NEPA disclosure for the TransWest EIS involved an iterative adaptive process of identifying alternative project corridors (as disclosed in the Draft EIS) and reducing the width of those corridors based on resource and/or physical constraints. The goals of this approach are to allow flexibility in routing to minimize environmental impacts to the maximum extent possible, address resource constraints, and ensure transparency with the public and agencies during routing by avoiding variances in the approved right-of-way grant. Section 2.3.1 of the Final EIS has been revised to include details regarding this approach and Chapter 3 of the Final EIS has been revised to include additional detailed analysis related to refined alternative corridors and a preliminary engineered alignment for the transmission line.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Utah Farm Bureau	128-108	We would like to re-emphasize the importance of working with agricultural landowners, as the powerline crosses Ag land, in placing (siting) the towers in places that accommodate the land owner needs (where possible). We encourage Transwest to recognize the difficulty of farming around towers in the middle of fields. We also want to ask Transwest to work hard to not disrupt agricultural water delivery systems and respect private property as they construct the project.	Please see the applicant committed protection measures TWE-16 and TWE-40 in section 3.14.6.1. TWE-16 states that water facilities would be repaired or replaced if damaged by construction activities. TWE-40 states that the ROW would be aligned to reduce impacts to agricultural production to the extent practical.
Venuti,	258-465	One alternative route for the proposed project, obviously separate from the applicant preferred alternative I-A and II-A, is a line that would stretch far out of the way into Garfield County (I believe it is alternative II-C). My request is that this route be removed from further consideration. It seems we are at a point in this project where involved agencies need to buckle down and look at what is actually a possible place for this transmission line to go. When looking at the maps in the Draft Environmental Impact Statement it's incredible that this alternative was even proposed with the extra mileage that would be necessary to actually complete it.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Alternative II-C has been retained for further analyses and consideration as it provides an alternative to address resource concerns associated with other routes being considered, including impacts to Forest Service inventoried roadless areas. For details on the relative impacts of the alternatives see Chapter 3 of the Final EIS.
Vickrey, Kevin	398-594	concerning the plan to run 600 kv power lines on Reservation Road near the Avintaquin camp ground in the state of Utah. I would like to voice my concern about the negative impact this would have on one of my favorite recreation areas. This area of our state has majestic views and is considered a designated scenic byway. The proposed project route would be a deterrent to all of the people who enjoy it's natural beauty and breathtaking scenery. I understand the need to improve our country's infrastructure to meet the power demands of the citizens in neighboring states, but I would like to offer an alternative plan that would move the power line corridor to a lower elevation near Emma Park Road. This area seems move conducive to this kind of project. It is a wide open flat expanse void of trees and rugged terrain that would facilitate construction as well as maintenance requirements. It appears that altering the proposed course a few miles to the South would have little impact to the 725 mile project and meet the overall goal while preserving one of Utah's few pristine recreation areas.	Both the Draft and Final EISs include alternatives that are located off of Reservation Ridge. In their selection of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Vickrey, Kristy	395-591	I do not like the plan / idea of having the power lines on top of Reservation Ridge, is there any way to put the lines down lower on the mountain in the flat ground so that they do not disturb the natural environment that exists on top of the mountain?	The range of alternatives considered in both the Draft and Final EISs include alternatives to locate the transmission line off of Reservation Ridge. In their identification of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Vogt, Tim	454-530	My principal concern is that private land which is patented mining claims originally known as Mineral Survey 1905 is located in the BLM record ambiguously or in error. I own that land which was Mineral Survey 1905. I'm very concerned that that land appear in the correct location for the continued planning and assessment of the transmission project. The record shows that it's in both Township 6 South and 7 South, Range 70 East, when, in fact, it's located entirely in the Township 6 South, Range 70 East.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Please see response to comment 605-859 for more details.
Vogt, Tim	454-532	My third concern is that the comments that I made at a Scoping Meeting did not seem to be collected within the Draft Environmental Impact Statement, and this distresses me greatly.	Your scoping comment regarding the mapping of your property was reviewed; however at the time, no approved datasets aligned with the location of your property as described in the scoping letter. Since the releases of the Draft EIS, there have been corrections to those datasets and the location of your patented mining claim has been corrected. This information will be relayed to TransWest for coordination regarding ROW siting.
Vogt, Tim	607-841	The Draft Environmental Impact Statement agency preferred alternative reference line bisects my private property (Lincoln County parcels 009-011-73 and 009-012-23 originally surveyed and patented as "Mineral Survey 1905") as defined by survey monuments on the ground, master title plat, and GCDB even though the current surface management map does not represent the true location of this property. It appears that the current planning as represented in the DEIS does not acknowledge the true location of this private property. It is imperative that the true location of Mineral Survey 1905 as shown in the GCDB in section 32 T6S R70E be considered in the planning of the TWE powerline. It appears that an office decision placed MS1905 on the map with USLM No. 1 occupying a prominent point. However none of the other evidence available (surveyed and platted topography, latitude measurement, backsighting of adjacent peaks) supports its current position. There is no evidence that actual survey data was used to place MS1905 on the map with respect to the PLSS. Monuments with bearing trees are present on the ground in an area that matches the surveyed and platted topography (natural calls) and represented in the GCDB.	This information has been provided to TransWest so it may be considered in the final siting of the transmission line as appropriate. However, the EIS considers the most current information available from official sources at the time the EIS analyses were completed. Any updated official information will be considered as it becomes available.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Vogt, Tim	607-843	A much smaller visual impact could be felt if the powerline was located over one hilltop to the west. Or ramifications of newly constructed access could be minimized by following generally Bunker Peak road located to the east. An exception to the two mile wide corridor should be sought in this area to minimize the visual impact and/or eliminate the construction of new through going roads in a completely undeveloped area.	This information has been provided to TransWest so it may be considered in the final micro siting of the transmission line as appropriate.
Voices of the Valley	455-674	The following comments are offered for your consideration on the above project. The focus of our comments will be on the inadequacy of information provided in the draft EIS, particularly with regard to information on the numbers and staging of workers for the project. We know from past experience with other energy development projects in Carbon County that incoming workers often choose to live in this area, even if it involves a long commute to their worksite. This is particularly true for workers who choose to bring their families. We acknowledge that incoming workers typically provide an economic benefit to the areas in which they choose to live. However, if the community they choose is unprepared, particularly in terms of available housing, their arrival may have unforeseen/undesirable consequences.	The assessment contemplated the completion of construction at the Sinclair refinery prior to the construction of the Northern Terminal and Spread 1, a major construction project employing hundreds of non-local workers. Nonetheless, the comment is accurate in that the availability of apartments and conventional homes is constrained and some workers may choose to commute to/from other nearby communities, including those in the UNPV, irrespective of housing availability. The sections on housing and facilities and services were revised to reflect the concern and potential effects on the community. See also suggested mitigation measure SOCIO-1.
Voices of the Valley	455-675	As an organization formed to assist the local public in anticipating, understanding and responding to change agents potentially affecting quality of life in the Upper North Platte Valley (UNPV), it was our intention to utilize information in the draft EIS, first to inform the public about the changes that might be coming, and second to help them formulate responses and recommendations designed to help guide development in ways most beneficial to those who live in the area. Unfortunately, the information provided in the draft EIS, particularly with regard to housing information for incoming workers who may elect to reside in the UNPV is too limited to allow us to follow through on this intention. Instead we will point out examples where the information provided is insufficient and suggest what needs to be added in order for us to follow through on our original intention when (if) the needed information is provided in the Final EIS.	Thank you for your comment related to the DEIS. See the response to comment 455-674.
Voices of the Valley	455-676	In EIS Chapter 3, Affected Environment and Environmental Consequences; Section 3.17, Social and Economic Impacts; page 3.17-4- it is acknowledged that, "Hunting and fishing, by residents and visitors alike, are important outdoor activities in much of this region ... and ... farming and ranching, the latter heavily reliant on grazing on BLM and USFS lands, is important to the region from an economic, land use, and cultural perspective." In fact, the Carbon County Land Use Plan identifies these and other renewable natural resource values as the primary reason why residents have chosen to buy property and live in the area. The subsequent analysis is silent on how many workers might be coming to live in the Valley during the several phases of the project, how that influx might affect those resources and the quality of current residents' experience as they continue to utilize those natural resources constituting the primary reason for why they chose to live here. This "quality of life" factor is reflected in the list of socioeconomic issues and concerns identified during scoping - "Potential economic and social effects [are anticipated] due to project related effects on outdoor recreation opportunities and activities, including big game hunting, camping, hiking, and DRV use." Further, on page 3.17-8 of the EIS, it is stated, "One legacy of energy development and tourism and outdoor recreation travel in recent years is the expansion of the hospitality industry and the bolstering of the retail trade sector across the region". Yet, nowhere in the project impact analysis, is there recognition of the importance of temporary housing to tourism, currently the most important industry in the UNPV, or the potential effects of the proposed project on the availability of temporary housing to industry. This is most apparent in the section on Temporary Housing on page 3.17-19. Here we offer italicized excerpts of that and the following section with parenthetical comments on how differently UNPV residents might respond to the same information.	The text in Sections 3.17.4.1 and 3.17.5.1 was revised to acknowledge the competing markets for temporary housing from energy and construction workers, hunters and other outdoor enthusiasts, and other tourists/travelers and the potential for demands from the project to compete with those demands. In some instances, this will lead to temporary displacement of demands, with potential indirect effects on other sectors of the economy and established activity patterns and social interactions of residents and others. These indirect effects may be perceived as adverse by some and beneficial by others. For example, lodging, dining and convenience shopping proprietors might perceive the increased demand in traditionally slow (non tourism) seasons as beneficial.
Voices of the Valley	455-677	"Construction of the terminals would increase demand for temporary housing in affected communities, with the timing and magnitude of demand corresponding to the influx of non-resident workers. Overall demand would be comprised of a combination of a few ownership units, conventional single family and apartment rentals, RV/camper parking spots, and motel rooms." -- This statement, referring to an overall demand of a "few" housing units, underestimates the significance of the impact from a local perspective. Almost anyone in Rawlins, Sinclair, or the UNPV can tell you that the surplus of housing units repeatedly referred to in the Draft EIS has disappeared. Due to developments unreported in this analysis, including the increase in housing demand from the Sinclair refinery and the reopening of the lumber mill in Saratoga, it is difficult to find any available temporary housing units throughout the area. This is already causing problems for tourism as the primary local industry because visitors are having trouble finding a place to stay unless they make reservations far in advance.	The assessment contemplated the completion of construction at the Sinclair refinery prior to the construction of the Northern Terminal and Spread 1. However, the availability of apartments and conventional homes is constrained and could result in some workers choosing to commute to/from other nearby communities, including those in the UNPV. The section on housing in 3.17.5.1 was revised to reflect the concern and potential effects on the community.

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Commenter Name	Comment ID	Extracted Comment	Response
Voices of the Valley	455-678	Project-related demand for temporary housing in Rawlins and Sinclair could compete with the needs from other energy development projects, including the Chokecherry-Sierra Madre wind energy project, and seasonal demands associated with business travel and tourism. [i.e. The situation is far worse than is suggested in the project analysis and should be dealt with as such in the Cumulative Impacts analysis in Chapter 5. As will be shown in comments below, it is not.] The supply of temporary lodging is constrained [far more so than is suggested here and elsewhere in the analysis]. Thus, construction of the terminals would contribute to temporary shortages and may result in work force commuting to/from other communities [particularly the UNPV where past and current experience, with the Rawlins prison and the Hanna coal mines, respectively, shows that workers (especially workers with families) often choose to make long commutes to live here rather than in communities nearer the work site but perceived as offering a lower quality of life. Because a rash of energy developments currently on line in Carbon County have failed to recognize this factor, Voices of the Valley commissioned its own scientific study in the spring of 2013 using a "gravity model" that takes into account the major factors known to influence peoples' choices of where they live. Results of that study indicate that far more project workers will gravitate toward the UNPV than is suggested by the simple "proximity model" used in this analysis.] Because construction of the terminals would involve increased demand for a moderately long period, the project may stimulate investment in new temporary housing. [This statement implies, incorrectly, that the investment in new temporary housing is a simple stimulus-response situation, thus ignoring the fact that the need must be anticipated will in advance in order for the additional housing to be available when it is needed. This would require significant coordination with the affected communities and potential funders of the additional housing].	The study you reference was incorporated into Chapter 5 as appropriate to show the cumulative impacts of the Project and past, present, and reasonably foreseeable future actions on housing in communities affected by the Project.
Voices of the Valley	455-679	In the Population and Demographics section on page 3.17-9: "The influx of non-resident workers to meet demand for specialized labor would result in a temporary population influx into the Rawlins and Sinclair communities (northern terminal) ..." -- Note how the authors assume that only Rawlins and Sinclair will be affected, when the temporary housing of both is already consumed by Sinclair refinery, thus failing to acknowledge the potentially significant migration to other areas, most prominently the UNPV. "The size and relative scale of the population influx would depend on the availability of local residents to fill direct, indirect, and induced jobs. In the Rawlins/Sinclair area, the population influx could be upwards of 200 to 300 depending on the time of year when construction begins, the level of oil and gas development in the region at the time, and labor needs generated by other projects." -- This statement leads the reader to anticipate a thorough analysis of the cumulative impacts on population and demographics in Chapter 5. Clearly, until the combined effects of all developments going on at the same time are considered, we really do not know the dimensions of the changes we are facing. However, as noted both above and below, such an analysis never materializes in the draft EIS.	The text in Sections 3.17.4.1 and 3.17.5.1 was revised to acknowledge the competing markets for temporary housing from energy and construction workers, hunters and other outdoor enthusiasts, and other tourists/travelers and the potential for demands from the project to compete with those demands. In some instances, this will lead to temporary displacement of demands, with potential indirect effects on other sectors of the economy and established activity patterns and social interactions of residents and others. These indirect effects may be perceived as adverse by some and beneficial by others. For example, lodging, dining and convenience shopping proprietors might perceive the increased demand in traditionally slow (non tourism) seasons as beneficial. The comment also indicates concerns regarding cumulative effects arising from other foreseeable developments in the region; Section 5.17 was revised to address this concern.
Voices of the Valley	455-680	At the bottom of page 3.17-19, it is stated that, "Public facilities and services most likely to be affected by construction of the terminals include law enforcement, emergency medical services, water, wastewater, road and bridge, and general administration. Potential effects include an increase in the number of calls on local police and sheriff departments and EMS related to motor vehicle accidents, traffic enforcement, and altercations. The incremental demand on water and wastewater systems would be similar in nature to the demands associated with tourists and travelers, which are already being accommodated." The general tone of this analysis is that these affects are incidental and clearly within the capacity of the affected communities to handle. However, if only 10 to 20% of the 200 to 300 workers identified above, just for the northern terminal, were to come to the UNPV, especially with their families, the impacts to these extremely remote communities would be significant indeed.	The text cited in the comments was intended to convey that project-related demands would be comparable in scale to demands associated with travelers and tourists. Moreover, non-local construction workers are most likely to live in temporary accommodations (motels and RV parks) which are already served by municipal utilities and most of these workers are unlikely to be accompanied by families. Thus, the net increment in demand would likely be limited. The text was revised to clarify the logic and conclusion regarding the incremental demand.
Voices of the Valley	455-681	On the following page, it is stated that, "Although no need for capacity expansion is foreseen at this time, following severe cutbacks in capacity during the recent recession, the City of Rawlins may interpret the project-related demand as contributing to a general need to expand service capacity." As if the project bears no responsibility for identifying and helping to respond to this need even though it is project personnel, to a small or great degree, that are requiring said expansion. There is a general theme in this chapter that the project bears little or no responsibility for the adjustments their incoming personnel are requiring of local communities.	The text cited in this comment is intended to convey that the recent recession had reduced demand on public facilities and lowered levels of utilization, resulting in increases in available capacity. Hence, no needs for increased infrastructure and system capacity are foreseen. The project could contribute to a need for additional staffing by the City of Rawlins and/or Carbon County, but as discussed in response to comment 455-682, the peak labor force increases associated with the terminal and Spread 1 would be less than a year in duration and comprise fewer than 350 workers -- generally insufficient to trigger increases in staffing for either of these jurisdictions or others including those in the UNPV. Furthermore, neither the city or county submitted comments indicating a defined need.

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Commenter Name	Comment ID	Extracted Comment	Response
Voices of the Valley	455-682	<p>On the same page, 3. 17-9, it is asserted that, "Due to their location, access and surrounding land uses, the completion of the terminals would have little impact to outdoor recreation, agriculture, or tourism, as they relate to quality of life." -- This conclusion is unsupported by the information provided on every count, but most particularly with regard to tourism. Recent surveys of local housing indicate that little or no surplus of temporary housing presently exists. Incoming projects may have to secure adequate worker housing some time before the work begins. This will leave no room for tourists and visitors, particularly during the busy summer season. The whole thrust of the housing impact assessment for this project is that crews will be moving and their occupancy will not be affecting anyone area for a significant amount of time. Moreover, maximum lodging revenues are realized through our tourism industry, where travelers are often staying for short times at full room rates. Energy workers often tie up hotel and motel rooms for long periods at negotiated lower rates, adversely affecting lodging tax revenues. One must read between the lines to realize that the northern terminal will be built first, will have twice the workers of the southern terminal, and be in place for the longest period of time. Therefore the area within commuting distance of that facility will receive the greatest and longest impacts associated with this project. It is conceivable, perhaps even likely, that most or all temporary housing in the UNPV will thus be "captured" by this and other proposed projects for at least the nearly two years of northern terminal construction and operation. The resulting impact upon the UNPV's number one industry, tourism, could be devastating, even from one summer season, much less two of them. As discussed below, this possibility calls for earlier and much more extensive interaction between project planners and UNPV residents.</p>	<p>The text cited in the comment refers to the direct impacts of the proposed terminal locations, both of which would be located in quasi-industrial areas with little recreation or agricultural value. The remainder of the comment deals with the short-term indirect effects of temporary workers residing in the community. As shown in Figure 3.17-5 and Table 3.17-13, the direct work force for the Northern Terminal would exceed 150 for about 6 months and average about 113 over the entire period, substantially less than that associated with the recent construction workforce at the nearby Sinclair refinery. The temporary housing supply in Rawlins is adequate to accommodate that level of demand during most of the year without competing with tourism demand or creating spillover demand to the UNPV. Furthermore, the timing of the peak demand is unknown, but were it to occur in the spring, it would likely represent a net increase in revenue for motels and RV campgrounds. The final issue raised in the comment relates to potential cumulative demands. That topic is addressed in section 5.17, which was revised to more clearly address potential cumulative effects, particularly as related to the nearby Chokeycherry and Sierra Madre Wind Energy Project.</p>
Voices of the Valley	455-683	<p>We believe that suggestions made for "additional mitigation" on page 3.17-23 move substantially in the appropriate direction and we applaud TransWest Express (TWE) for their following recommendations (in italics): "TWE must address temporary housing needs in conjunction with a Wyoming Industrial Siting Permit that must be obtained prior to the commencement of construction. That plan should address the combined housing needs during construction of the northern terminal, ground electrode, and Spread 1, particularly given potential competition for housing from other development in the area. Local officials should be consulted in the development of that plan. The housing plan should address housing needs associated with construction related indirect and induced jobs that would be supported.</p> <p>Effectiveness: Implementation of a pro-active housing plan could substantially reduce the potential for temporary housing shortages to become a source of adverse socioeconomic impacts within the analysis area, particularly during the period of peak employment. Such impacts would extend from housing to community services, public sector revenues, and social effects for workers and residents alike. The effectiveness of the plan will be contingent upon the specific elements, strategies, and programs used."</p> <p>With the above statement, TWE appears to understand that these issues are shared issues. The best solution will be a shared solution. The only modification to the above statement that we would offer is that, to be most effective, we should not wait for the Industrial Siting process to begin the collaboration. We recommend, instead that the collaboration process advocated by TWE begin during the National Environmental Policy Act (NEPA) process in which we are now engaged. We recognize that Carbon County and its municipalities are only part of those affected. But, because it is the earliest area to be affected, and, due to its extreme remoteness, affected the most, it would be prudent to begin the collaboration process now and, ideally, offer a plan to the Industrial Siting Council that has been arrived at jointly.</p>	<p>Thank you for your comment endorsing consultation and collaboration between TransWest and local governments to address temporary housing needs. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in the FEIS.</p>

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Commenter Name	Comment ID	Extracted Comment	Response
Voices of the Valley	455-684	Finally, while we do not agree with everything in the socioeconomic impact analysis in Chapter 3, particularly with regard to housing and related issues, we find the analysis to be largely thorough, especially in terms of the numbers and staging of workers coming into each of the project areas. As mentioned above, that thoroughness would lead one to expect a corresponding thoroughness in Chapter 5, Cumulative Impacts. In other words, the analysis of project impacts in Chapter 3 leads the reader to expect an expansion of that discussion to include the comparable, cumulative impacts of the proposed project plus those of other possibly concurrent or overlapping projects. To illustrate, the analysis of impacts to social and economic resources in Chapter 3 encompasses over 50 pages. Unexpectedly, the impact analysis for those same resources in Chapter 5 amounts to less than one page. For example, under Section 5.3.17, Social and Economic Resources, subsection 5.3.17.2, Cumulative Impacts, it is stated that, "Construction schedule and peak work force for the Project may overlap in time with the foreseeable projects such that the cumulative projects would impact housing and services within the counties affected. These projects include concurrent construction of other energy projects, transmission lines and pipelines, as well as those with ongoing oil and gas development that require temporary housing and services for many nonlocal workers, and where there is limited infrastructure to accommodate an influx of new workers." -- Which other projects? Are they up to the reader to discover? There has been no attempt to provide an assessment of the cumulative impacts of the proposed project plus reasonably foreseeable projects to provide the reader with a quantitative understanding of potential impacts. Therefore this chapter fails to meet the NEPA criteria presented at the beginning of the chapter. The paragraph ends with the statement: "The exact extent of that overlap is impossible to predict as it depends upon the timing of construction and operation of many projects, much of which is unknown." This amounts to the authors throwing up their hands and giving up on their responsibility to provide a comprehensive assessment. To address their legitimate concerns, local municipalities need to know the numbers and staging of incoming workers of all projects potentially concurrent with the proposed project and it is not their job to figure that out. It is the responsibility of the EIS authors to provide that information to the best of their ability.	The cumulative socioeconomic analysis in Section 5.17 was revised to the extent possible to address your concern. Please note that this analysis is limited based on what projects are reasonably foreseeable and what assumptions could be made regarding the specific construction timeframe for TWE and these projects as it is not precisely known when (or if) they would be approved and if so, when construction would exactly begin.
Wagstaff, Neil	457-534	I have property on Reservation Ridge Road. It's Nenty Subdivision, Lot 3. The line they are proposing – the Alternative 2F, I think it is -- yeah, 2F, is going to go over the south end of my property, where I have two cabins located. And that will probably pass directly over it. The EIS statement says there are no cabins within 200 feet of the line. I represent four lots there. Mine, plus three others. And there's one, two, three, four, five, six, seven structures, I think, within about 500 feet. Now, they say there's 13 structures on the whole line. So it doesn't look like the -- they've done - they've done their homework too well, for that particular alternative.	This area was re-analyzed and the results were inserted into the text of Section 3.18.7.4.
Walker, Mike	198-249	please extend the public comment period another 90 days many unresolved issues.	The BLM determined that a 90-day comment period was sufficient for comment on the Draft EIS and declined to extend the comment period further. Please note that a 90-day comment period is double the required comment period required for EISs for site-specific projects and meets the requirements for comment periods for EISs analyzing land use plan amendments. These requirements are detailed in the Council of Environmental Quality Regulations for the Implementation of the National Environmental Policy Act (CEQ regulations), the BLM NEPA Handbook (H-1790-1), and the BLM Land Use Planning Handbook (H-1601-1).
Wallace, Tom	377-570	Would you please give me a short explanation of the emergency shutdown procedure and the role that the ground electrode system plays in the procedure.	Section 2.4.3.2 of the Final EIS was revised to include a brief explanation of the contingency conditions and ground electrode system operation.
Weber, C.	159-151	I congratulate the BLM in working expeditiously on the Trans West Express project environmental impact statement.	Thank you for your comment.
Wells, Helen	465-492	And I don't know how much our comments will really do. Seems like everything has been settled, so when they talked about the alternate routes, it's nice to know if they will consider them more.	All public comment is considered during development of alternatives and selection of the agency preferred alternative (APA). The criteria used for selection of the agency preferred alternative are outlined in Section 2.8.1 of the Draft EIS. Several changes to the APA have been made in response to public and agency comment on the Draft EIS. Those changes are reflected in the agency preferred alternative description in Chapter 2 of the Final EIS.
Western Resource Advocates	565-1252	The manner in which data is presented in the DEIS, mostly by entire Alternative routes rather than segments, made comparisons challenging (see Section VIII for additional information). We strongly encourage this information be made available for all segments in the FEIS, to improve selection of a route with the least amount of resource impacts.	The TWE DEIS provides analysis at the alternative level to provide clear disclosure and comparison of alternative impacts. Analysis at the segment level does not provide a comparison of the relative impacts of each complete alternative. To address your concern, the disturbance impacts by segment has been provided in an appendix to the Final EIS.
Western Resource Advocates	565-1254	The just published 2013 Western Electricity Coordinating Council (WECC) Interconnection-wide Transmission Plan that includes a comprehensive list of land area types where development of lines is more appropriate and a separate list of those types where such development is very restricted or completely prohibited.	Consideration of the WECC 2013 plan, as well as RMP and Forest restrictions, were considered in the development of project alternatives and in the identification of the Agency Preferred Alternative.

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Commenter Name	Comment ID	Extracted Comment	Response
Western Resource Advocates	565-1255	Important wildlife movement corridors, landscape connections, and crucial wildlife habitats in the TWE project area are less well known and their geospatial data are less available. One of the best sources for these areas and maps is the Crucial Habitat Assessment Tool (CHAT) available through state wildlife agencies and also through the Western Governors Association (http://www.westgov.org/initiatives/wildlife). These corridors and connections are crucial to the current and long-term viability of game and nongame wildlife, especially as they provide adaptation options in the face of a changing climate.	Comment noted. As of April 24, 2014, the WGA CHAT tool is still in development according to the link provided. The only state CHAT currently operation is the State of Wyoming's WISDOM tool. In preparing the biological resource sections of the TWE EIS, the lead agencies obtained data on crucial wildlife habitats directly from state wildlife management agencies.
Western Resource Advocates	565-1256	In a 2009 report prepared for the Department of Energy titled "Sage-Grouse and Wind Energy: Biology, Habits, and Potential Effects from Development," the authors summarized that "...that sage-grouse were particularly susceptible to the placement of overhead power lines at within 0.8 km (0.5 mi) of nesting grounds. Significant impacts to sage-grouse have been documented from overhead power transmission and communication distribution lines out to 6 km (3.7 mi)." The USFWS 2010 Finding also identified power lines as directly affecting GRSG "by posing a collision and electrocution hazard", having indirect effects by decreasing lek recruitment increasing predation, and facilitating the invasion of exotic annual plants (all citations for these and other findings above and below are included in the TransWest Express DEIS Comments by TWS, Audubon Rockies and partners – 9-30-13). Additionally, sage-grouse could be impacted through a direct loss of habitat and human activity. The recently released Gateway West FEIS noted that recent research identified the best predictors between extirpated and occupied ranges to include distance to transmission lines. Knick et al. 2013 further emphasizes intolerance of grouse to human disturbance and development, reporting that 99% of active leks in the species' western range were in landscapes with <3% disturbance.	Thank you for your input. FEIS Section 3.8.4.1 Federally Listed and Candidate Species has been updated to include relevant information referenced in your comment.
Western Resource Advocates	565-1257	Earlier this year, the U.S. Geological Survey in cooperation with the BLM, released "Summary of Science, Activities, Programs, and Policies the Influence the Rangeland Conservation of Greater Sage-Grouse (<i>Centrocercus urophasianus</i>): Open-File Report 2013-1098". This report notes that transmission lines and local distribution lines are widespread throughout the range of sage-grouse and are especially prevalent in MZ II and in priority habitats in portions of MZs III and IV. This proposed high voltage transmission line will be an additional disturbance on the landscape, with its placement determining level of impacts to this imperiled species.	Comment noted. Information included in the referenced report will be reviewed and considered for inclusion in the FEIS.
Western Resource Advocates	565-1258	This USGS study also discussed how the impacts of climate change could swamp the impacts of all other threats to this vulnerable bird species. Other studies have suggested that more than 50% of the sagebrush ecosystem could be lost to climate change. These threats demonstrate the paramount important of addressing climate change through renewable energy projects like TWE but also the critical importance of avoiding as much as possible any development impacts to the highest quality (priority) habitats as described below.	Thank you for your comment. TransWest has committed to avoiding or minimizing impacts to greater sage-grouse habitat in accordance with the state and federal mandates that are in place at the time of the TWE ROD. Additional greater sage-grouse mitigation measure SSWS-5 has been refined and augmented for the Final EIS and would further reduce Project impacts to this species if mandated by the ROD. Compensatory mitigation for residual impacts to sage-grouse habitat will be determined through the HEA process. Because the Project is not expected to contribute to climate change (see DEIS Section 3.1.6 Impacts to Air Quality), there would be no climate change-related cumulative effects to the sagebrush ecosystem or to sage-grouse.
Western Resource Advocates	565-1259	Recent range-wide breeding density analysis performed for the BLM stresses the importance of specific areas to sage-grouse, and thus conservation prioritization. Specific portions of TWE routes fall within areas that contain the top 25 percent of the breeding population within Management Zones II (WY, CO, UT) and III (UT, NV). The USFWS 2010 Findings state, "Southwestern and central Wyoming and northwestern Colorado in MZ II has been considered a stronghold for sage-grouse with some of the highest estimated densities of males anywhere in the remaining range of the species. Wisdom et al. (in press, p. 23) identified this high-density sagebrush area as one of the highest priorities for conservation consideration as it comprises one of two remaining areas of contiguous range essential for the long-term persistence of the specie".	Thank you for your comment. This information has been included in the FEIS.
Western Resource Advocates	565-1261	Collectively, almost all of the conservation organizations that have been involved with the TWE continue to stress that that science strongly argues that the spatial restrictions (no surface use and controlled surface use restrictions) proposed in the DEIS are severely inadequate. The 0.25 mile and 0.60 restrictions around the perimeter of occupied leks have long been recognized as being without scientific merit and an inadequate protective measure to maintain lek activity (Holloran 2005, Walker et al. 2007). Research from oil and gas development indicates that impacts can be largely avoided by placing transmission lines within 5 miles of sage-grouse leks, an avoidance distance also recommended by the USFW. The Lander RMP DEIS and FEIS both recognized this, as did the Miles City RMP.	TransWest has committed to compliance with all applicable timing stipulations and surface use restrictions identified in Appendix C of the FEIS. The Applicant acknowledges the current BLM process to update official greater sage grouse conservation policy in multiple RMPs associated with BLM field office jurisdictions traversed by the proposed project. Current applicable timing limitations and habitat avoidance restrictions at the time of the TWE ROD will be adhered to during construction and operation of the Project, if approved. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Preliminary Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and Applicant objectives while balancing federal land managers' multiple use mandate.

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Western Resource Advocates	565-1262	BLM should only permit TWE to use the route described above that represents the least environmentally impactful options for developing the transmission line. TWE should avoid any of the lands listed within the WECC risk categories 3 and 4, which include the most protected and sensitive lands. The most accurate, up-to-date geospatial and wildlife data and the most current scientific and other formal guidance must be used to avoid impacting sensitive resources during establishment of the ROW and during actual construction.	Consideration of the WECC 2013 plan, as well as RMP and Forest restrictions, were considered in the development of project alternatives and in the identification of the Agency Preferred Alternative.
Western Resource Advocates	565-1263	GRSG priority habitats should be identified and protected with adequate stipulations revised to incorporate the most recent science. Based on the documented impacts in the scientific literature, WRA recommends avoiding the majority of impacts to GRSG by ensuring that transmission related development not take place within documented priority habitats. Outside of priority habitats, impacts can be largely avoided by no developing the line within 5 miles of leks. Actual on-the-ground surveys consistent with guidelines provided by the US Fish and Wildlife Service (USFWS) or state wildlife agencies should be required before ROWs are finalized and construction begins. In addition, we recommend that BLM and TWE use guidance below to minimize impacts that can't be avoided.	TransWest has committed to compliance with all applicable timing stipulations identified in Appendix C of the DEIS. TransWest also acknowledges the current BLM and USFS process to update greater sage grouse conservation policy for multiple field offices and NFS land use plans. TWE will adhere to greater sage-grouse land use stipulations current at the time of the TWE ROD. Requirements for surveys have been coordinated with USFWS and state wildlife agencies. TransWest continues its commitment to conduct all resource-specific surveys as directed by lead and cooperating agencies.
Western Resource Advocates	565-1264	There are numerous resources with additional information on best practices for mitigation for transmission line planning and development. These include, but are not limited to the following: - The Avian Power Line Interaction Committee's updated guidance document – "Reducing Avian Collisions with Power Lines: State of the Art in 2012" available at: http://www.aplic.org/ ; - Edison Electric Institute's "Mitigating Bird Collisions with Power Lines" available at: http://www2.eei.org/products_and_services/descriptions_and_access/mitigating_birds.htm - Western Resource Advocates' "Smart Lines" report, available at: http://www.westernresourceadvocates.org/energy/smartlines.php ; and - Wild Utah Project's "Best Management Practices for Siting, Developing, Operating and Monitoring Renewable Energy in the Intermountain West" available at: http://wildutahproject.org/files/images/BMP%20for%20Renewable%20Energy-2012-WUP.pdf	Thank you for your input. TransWest has committed to meeting or exceeding raptor-safe design standards contained in APLIC (2006) and additional mitigation measures that would require TransWest to meet the design standards in APLIC (2012) have been added to the Final EIS (i.e., WLF-5, WLF-7, WLF-8).
Western Resource Advocates	565-1265	BLM should require minimal construction of access roads and ROWs to reduce disturbance, establish speed limits on access roads, require stringent control of invasive species, and require equipment washing before entry into sensitive areas. Spill response and fire prevention materials should be located with crews during construction. Finally, erosion and sediment control devices should be installed and maintained during construction, and then removed when no longer necessary. Additional General BMPs include: - Requiring a tower design that minimizes and discourages perching and nesting by raptors and ravens; - Patrol and monitoring to detect raven nests and steps to remove them; - The project site be clearly marked or flagged at the outer boundaries prior to initiation of ground disturbance. Project activities shall be limited to the marked or flagged areas and whenever possible, activities shall occur within previously disturbed areas; - The proponent shall remove only the minimum amount of vegetation necessary for the construction of structures and facilities. Where possible and if needed, topsoil shall be conserved during excavation and reused as cover on disturbed areas to facilitate re-growth of vegetation; - Noxious weeds be controlled on disturbed areas within the limits of the right-of-way; - Minimize construction of new access roads and take appropriate steps to prohibit and discourage recreational use of them, including official BLM closures, signing and patrols.	The EIS includes a number of best management practices (BMPs), Design Features (DFs), and proposed mitigation to address the commenter concerns. Additionally, per DF TWE-2, a Construction, Operation, and Maintenance (COM) plan will be developed that includes many of the actions identified by the commenter. WWEC BMP ECO-1 (see Table C.1-1) stipulates the need to identify important, sensitive, or unique habitats and BLM sensitive, FS sensitive, and state-listed species in the vicinity and, to the extent feasible, design the project to avoid, minimize, or mitigate impacts to these habitats and species. DF TWE-29 indicates that the Biological Protection Plan will be developed as part of the COM plan. Additionally the proposed mitigation in Table C.5-1 includes a number of proposed measures to reduce impacts to specific plant and wildlife species. Several BLM FO RMPs include speed restriction in various wildlife habitats (see Section C.3, Richfield and St. George FOs). Additional mitigation measures SS-7 and RANGE-7 have been proposed to reduce speed limits in certain habitats within the project area (see Table C.5-1). WWEC BMP VEG -2 (see Table C.1-1) stipulates the need for an integrated vegetation plan that addresses invasive weeds. DF TWE-26 (see Table C.2-1) indicates that the Noxious Weed Managements Plan will be developed as part of the COM plan. Proposed mitigation measure NX-1 (see Table C.5-1) restates that a noxious weed management plan will be included in the COM plan and further stipulates the plan would include washing vehicles. DF TWE-64 (see Table C.2-1) incorporates the commenter's suggestion regarding about fire protection materials and further stipulates that a Fire Protection Plan will be included in the COM plan. DFs TWE-19 through TWE-25 (see Table C.5-1) outline erosion control and spill prevention practices to protect groundwater and surface water. Per TWE-57 a spill prevention notification and cleanup plan will be prepared as part of the COM plan. Additionally proposed mitigation measures S-6 and S-11 further identify additional stipulations related to erosion control structures (see Table C.5-1). WWEC BMP ECO-4 (see Table C.1-1) and TWE-41 (see Table C.2-1) address the commenter's concern about flagging. Stockpiling of topsoil is addressed by WWEC BMP SOIL-1 and REST-1 (see Table C.1-1), TWE-14 and TWE-19 (see Table C.2-1), as well as in proposed mitigation measure S-1 (see Table C.5-1). DFs TWE-30 (Table C.2-1) The applicant has committed to project conformance with raptor-safe design standards outlined in the APLIC 2006 (electrocution) manual. The specific designs and application of bird diverters will be outlined in the TWE Avian Protection Plan. For the Final EIS, raven management measures have been added to include in proposed mitigation for desert tortoise and greater sage-grouse and mitigation that would require TransWest to conform with design standards and BMPs contained in the APLIC 2012 collision manual have been added.

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Commenter Name	Comment ID	Extracted Comment	Response
Western Resource Advocates	565-1266	Fragmentation and degradation of GRSG habitat for transmission development from surface-disturbing activities, noise and other developments that are not avoided will further threaten this species. The DEIS proposes implementation of various measures to identify sensitive areas to GRSG (e.g. leks, nesting habitat, wintering habitat, etc.) and implement seasonal timing restrictions and protection buffers in accordance with various Instructional Memorandums, Executive Orders, and existing Resource Management Plans (RMP). Adherence to these regulations and guidelines is being presumed to reduce impacts to GRSG. However, there are fundamental flaws with this rationale and challenges for stakeholders to have assurances of meaningful protection for grouse. Specifically, (1) these RMPs are often dated and founded on inaccurate/inadequate protections, (2) field offices present an inconsistently wide range of protective measures, (3) these protections are primarily limited to construction only, (4) not all aspects of GRSG biology or habitat needs are adequately addressed, (5) monitoring and enforcement are poorly addressed, (6) off-site mitigation is inadequately considered, and (7) areas serving as refugia, such as unfragmented landscapes, are not identified for stronger protections.	TransWest has committed to compliance with all applicable timing stipulations identified in Appendix C of the DEIS. The Applicant acknowledges the current BLM process to update official greater sage grouse conservation policy and multiple associated RMP revisions. The FEIS will include current information regarding applicable timing limitations and habitat avoidance restrictions. Section 3.8.6 has been updated to clarify that timing stipulations are applicable to both construction and operation activities. Details regarding off-site compensatory mitigation are currently being developed in coordination with the USFWS and state wildlife agencies and will be discussed in the Applicant-developed Habitat Equivalency Analysis (HEA). A summary of the HEA process is provided in DEIS Section 3.8.6.4 Region 1 (page 3.8-60).
Western Resource Advocates	565-1267	Furthermore, the timing restrictions in the DEIS are also widely varying and could well pose a serious threat to nesting hens or those with foraging young. While there should be flexibility to incorporate local characteristics to fine-tune the window of protection (such as the addition of language "Where credible data support different timeframes for this seasonal restrictions, dates may be expanded by up to 14 days prior to or to the above dates" as was noted in the State of Wyoming Timing Restrictions, Table C.3-2), there should be a relatively consistent window of protections afforded to nesting and early brood rearing habitat. For example, in Wyoming, peak hatch generally occurs in early June and is followed by early brood rearing. Therefore, we strongly suggest that protections be extended until at least July 15 to be meaningful and maintain healthy future populations.	TransWest has committed to compliance with all applicable timing stipulations identified in Appendix C of the DEIS. The Applicant acknowledges the current BLM process to update official greater sage-grouse conservation policy and revise multiple associated RMPs to strengthen regulatory protections for sage-grouse. It is expected that these RMP amendments will be in place by the time of the TWE ROD. If not, the decision makers have the authority to mandate Project-specific sage-grouse protection measures that would apply across the entire greater sage-grouse analysis area.
Western Resource Advocates	565-1268	Review of the DEIS by the environmental groups identified SSWS-5, which attempts to limit avian predation through anti-perching devices and reduce collisions with bird diverters, as the only mitigation measure for focused on minimizing impacts to GRSG during the operation phase of the proposed Project. The remaining protective stipulations apply primarily to the development-specific time-frame. Lander RMP FEIS notes that "wildlife seasonal protections from surface-disturbing and disruptive activities apply to maintenance and operations actions when the activity is determined to be detrimental to wildlife. Beyond initial exploration (including geophysical activities), land clearing, and aboveground facility construction, continued human disturbance to special status wildlife could occur from activities such as equipment maintenance and site operations, which are especially disruptive during sensitive times (wintering, breeding, and nesting)." The Miles City Draft RMP noted that in areas where development occurred, "there would be no restrictions to operation and maintenance activities, which would potentially result in the reduction or extirpation of populations." The current protections proposed for adoption includes no surface occupancy (NSO) stipulations to protect grouse. However, NSOs are subject to exceptions, waivers and modifications. If these exceptions are applied to NSO then the protections fail to meet the regulatory certainty being sought by USFWS.	Section 3.8.6 has been updated to clarify that NSO/CSU timing stipulations apply to both construction and operation activities. Exceptions, waivers, and modifications to RMP/LUP stipulations are not part of the proposed action and are therefore outside of the scope of NEPA analysis. Mitigation measure SSWS-5 has been updated to include other applicable mitigation to further conserve greater sage-grouse
Western Resource Advocates	565-1269	The TWE DEIS fails to adequately address noise impacts. Facilities that produce continual noise can interfere with male greater sage-grouse strutting behavior, which could reduce the reproductive success of greater sage-grouse using these leks. BLM notes in the Gateway West FEIS, "construction-related noise and dust disturbance would occur during construction, which could potentially make habitat within the immediate vicinity of the activity temporally unsuitable for this species." In the recently released Miles City Draft RMP, BLM recognizes the impacts of noise, "Movements associated with oil and gas wells, noise associated with disruptive activities and compressor stations, vehicle use, and human presence would impact numerous wildlife species indirectly, including sage grouse. Sage-grouse numbers on leks within approximately 1 mile of compressor stations would contain lower numbers than leks greater than 1 mile from compressors. Male attendance at leks would be expected to be reduced when subjected to the current standard noise limitation of 50 decibels at the lek site".	Comment noted. Information regarding potential impacts from noise are discussed in Section 3.7.6.2 (DEIS page 3.7-47). This discussion is also referenced in Sections 3.8.6.1 Impacts from Terminal Construction and Operation and Section 3.8.6.3 Impacts Common to all Alternative Routes and Components.

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Western Resource Advocates	565-1270	Winter habitat, including concentration areas, are referenced in the document (DEIS 3.8-14): "In years with severe winter conditions (i.e., deep snow), greater sage-grouse often gather in large flocks in areas with the highest quality winter habitat. It is suggested that high quality winter habitat is limited in portions of the greater sage-grouse's range (Connelly et al. 2000). Wintering habitat for greater sage-grouse has been defined for populations in Colorado and Utah, and is currently being defined for populations in Wyoming (WGFD 2012)" and (DEIS 3.8-60). The Lander FEIS/RMP states: "In identified greater sage-grouse winter range, vegetation treatments should emphasize strategically reducing wildfire risk around or in the winter range and maintaining winter range habitat quality."	A separate section on wildfire was added to the FEIS as Section 3-21. Additional detail on wildland fire effects was added as appropriate to wildlife, visual, public health and safety, and cumulative impacts. A fire protection plan will be developed as part of the Construction, Operation, and Maintenance Plan. As appropriate, specific requirements of the fire protection plan will be outlined as mitigation in the wildfire section. See Appendix D part 1 and 2 for TWE's committed environmental mitigation measures related to fire protection (No-64).
Western Resource Advocates	565-1271	Fencing can be an obstacle or potential hazard to GRSG by fragmenting habitat, providing potential collision points, and providing perching opportunities for raptors. A Utah study found that 18% of sage-grouse deaths were due to fence collisions. A 2009 WGFD report examined sage-grouse mortalities near Farson and found that sage-grouse fence diverters reduced sage-grouse fatalities by 61 percent.	Thank you for your comment. Fence marking, modification, or removal was mentioned in the DEIS as potential off-site mitigation in Section 3.8.6.4 of the DEIS under Overview of Habitat Equivalency Analysis. Fence marking in high quality habitat has also been added as additional mitigation under SSWS-5.
Western Resource Advocates	565-1272	Riparian-wetland areas are a component of brood-rearing habitat for greater sage-grouse because they provide needed forbs and insects necessary for chick survival. Actions that improve riparian-wetlands improve habitats for special status wildlife species, especially increasing the quantity and quality of riparian-wetland vegetation and insects, are critical for sage-grouse. Although riparian/wetland habitats were inadequately addressed in the DEIS, the Rawlins Field Office had protections to only 500 feet of riparian and wetland areas while the Salt Lake Field Office extended protections out to 1,200 feet.	Comment noted. Riparian protections vary across the multiple BLM field offices as directed by specific RMPs. Riparian habitats are one of multiple factors considered by the state wildlife agencies when designating sensitive habitat for GRSG and other species. The lead agencies and the applicant have utilized the best available and most accurate species habitat data through continuously updating resource datasets as provided by the cooperating agencies throughout the NEPA process.
Western Resource Advocates	565-1273	Specific Recommendations to Minimize Impacts to GRSG: <ul style="list-style-type: none"> - To the degree possible, avoid transmission development within 4 miles of GRSG leks, nearby nesting and brood-rearing habitats, and winter habitat outside of the priority habitats. - Extend protections until at least July 15 to be meaningful and maintain healthy future populations. - Extend protections into the operations and maintenance periods. - If waivers, exemptions and modification are allowed for NSOs, set up a process that allows the public to comment when these actions are considered. - BLM and TWE carefully review and incorporate new research which relates to noise impacts on grouse, as these are suggesting threats to sage-grouse population viability – through abundance, stress levels, and behavior. - The DEIS needs to identify (through mapping) the spatial distribution/acreage of current winter habitat for sage grouse and its current quality, especially as this latter will likely drive selection of appropriate protective measures and prioritize restoration activities. Because of the importance of this habitat to grouse, we suggest protection for these areas based on what has been presented in the Lander FEIS/RMP. - Fences in high-risk areas (based on proximity to leks, lek size, and topography) should be removed, modified, or marked to reduce sage-grouse strikes and mortality" as approved in the Miles City RMP. - Surface disturbing and disruptive activities should be prohibited within 1,329 feet (0.25 mile) of riparian habitats and 100-year floodplains where mapped. 	We appreciate your input on potential impact avoidance and minimization measures for Greater Sage-Grouse. The EIS quantifies the number of sage-grouse leks within 4 miles of the alternatives and the decision-maker will take these numbers into consideration in the ROD. It is anticipated that, where applicable, the final sage-grouse conservation stipulations mandated by the ROD will conform to those identified through the current BLM and USFS land and resource management plan amendment processes for federal lands and with the various state sage-grouse conservation plans for state and private lands. Section 3.8.6.4 and Appendix C, Table C.5-1 list several mitigation measures applicable to sage-grouse (SSWS-5), which have been augmented for the FEIS. Some of the additional measures that you suggest (such as marking fences in high-risk areas) have been added to SSWS-5 and/or are identified as potential offsite mitigation in Section 3.8.6.4 Overview of Habitat Equivalency Analysis .

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Western Resource Advocates	565-1274	<p>Desert Tortoise Specific BMPs:</p> <ul style="list-style-type: none"> - In or near Desert Tortoise habitat, require a certified desert tortoise awareness program be provided to all project workers onsite. - All vehicles, equipment, and crews be escorted by a biologist at all times when in desert tortoise habitat; - All Project sites be searched for desert tortoises prior to implementation of work activities; - The ground under and around all parked vehicles be checked before the vehicles are moved; - A 15 mph speed limit be required for all project vehicles on the project site and unposted access roads; - If a desert tortoise or a desert tortoise nest is discovered, cease construction activities in the immediate area. The tortoise shall be moved 150 to 1,000 feet from the point of capture by an authorized desert tortoise biologist in accordance with USFWS-approved guidelines; - All potential desert tortoise burrows be flagged and avoided by all project vehicles, equipment, and activities. At the conclusion of project activities, flagging should be removed; - Burrows containing tortoises or nests are excavated by hand, with hand tools, to allow removal of the tortoise or eggs. Ground disturbance in the area should not resume until approval is received from the tortoise biologist; - All excavations are checked for tortoises periodically throughout the day and immediately before backfilling. If excavations are not backfilled at the end of the day, they shall be covered and/or fenced to ensure that tortoises cannot enter them; - No cross-county travel or travel outside the ROW be permitted; - All project-related trash and food items are disposed properly in predator-proof containers with resealing lids. Trash, stakes, flagging materials, temporary facilities, litter, and all other project-related materials are removed from site upon completion of project activities. 	The suggested measures have been included in revised mitigation measure SSWS-4 in the Final EIS.
Western Resource Advocates	565-1275	<p>Avian Specific BMPs: - All power lines are designed, installed, and constructed to be avian-safe in accordance with the standards outlined in "Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006" (APLIC 2006); - All ground-disturbing activities are conducted outside the migratory bird nesting season (March 15 August 31). If ground-disturbing activities cannot be avoided during this time period, pre-construction nest surveys shall be conducted by a BLM-approved biological monitor; - Bird diverters will be placed on guy wires.</p>	Comment noted. Per applicant-committed measure TWE-30, TransWest has committed to design the proposed Project to meet or exceed the standards described in APLIC 2006. Implementation of additional mitigation measures WLF-1 and WLF-2 would protect raptors and other migratory birds during the avian nesting season. Per additional mitigation measure SSWS-5.5, TransWest would be required to outfit all guy wires with bird diverters in high quality sage-grouse habitat. Moreover, measures WLF-5, WLF-7, and WLF-8, would require line marking (i.e., bird diverters) in IBAs, BHCAs, and other sensitive avian habitats. These measures are described in Section 3.7.6, 3.8.6, and Appendix C, Table C.5-1 of the Final EIS.
Western Resource Advocates	565-1276	<p>WRA recognizes that the proponent has committed to developing an operational policy and a comprehensive strategy for collecting data, minimizing impacts, and mitigating loss of migratory birds and essential habitats prior to the initiation of construction. This policy and strategy will be incorporated into a single, over-arching document (Avian Protection Plan or Bird Conservation Strategy) that will include a full listing of all minimization measures included in this analysis, as well as recommendations from the USFWS and additional information included within the Avian Protection Plan Guidelines, developed by the USFWS and APLIC in 2005 (APLIC 2012). The APP should describe how the transmission tower design will reduce electrocution risks, prevent nesting, and prevent collisions with electrical wires and tower support wires. The TWE APP should be continually evaluated and refined as monitoring data and new innovations become available.</p>	Comment noted. A comprehensive list of avian conservation measures will be outlined in the TWE Avian Protection Plan, which is expected to be a "living document" prepared in collaboration with the USFWS. It is anticipated that TransWest's preparation of the TWE APP will follow the APP Guidelines presented in APLIC's 2012 collision manual. No change to text.
Western Resource Advocates	565-1277	<p>Given the breadth of avian impacts anticipated to occur with this line, including to sensitive species, the APP should be made available for public review prior to the release of the FEIS.</p>	Development of the APP in coordination with the USFWS and state wildlife agencies is ongoing. The Final TWE APP will be provided concurrent with the release of the Final EIS.
Western Resource Advocates	565-1279	<p>Nesting is considered the most critical period in the raptor life-cycle because it determines population productivity, short-term diversity, and long-term trends. Significant attention should be paid to the raptor buffers as all raptors are protected under the Migratory Bird Treaty Act. Raptor nest protective buffers proposed in the DEIS are inconsistent across the project and inadequate, as was noted for Greater Sage-grouse. Any activity that disrupts breeding, feeding, sheltering, and roosting behavior and causes, or is likely to cause, nest abandonment or reduced productivity is considered disturbance and is a violation of Bald and Golden Eagle Protection Act. We encourage the BLM to adopt the following protections - prohibiting surface-disturbing activities within 1 mile of Golden Eagle (GOEA) nests and 1 mile for Ferruginous Hawk nests. Our organizations support the specificity of "nests active within the past 7 years" and the inclusion of winter roost sites. We recommend 1 mile buffer for all other BLM Special Status Raptors (Burrowing Owl, Swainson's Hawk, Peregrine Falcon, and Northern Goshawk).</p>	Comment noted. Per applicant-committed measure TWE-32, TransWest has committed to project conformance with seasonal restrictions and avoidance buffers for nesting raptors identified in the EIS. Refer to Section 3.7.4.3 of the Final EIS for a list of spatio-temporal nest buffers identified by state wildlife agencies and the USFWS for raptors with potential to occur within the TWE analysis area.

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Western Resource Advocates	565-1280	Golden eagles (GOEA) are protected under two major forms of federal legislation, the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA), and under increasing federal scrutiny with uncertain population levels. Based on the USFWS' analysis of populations across the nation, there is no safe allowable take level for GOEA; however, take is likely unavoidable with transmission project of this magnitude and in this location. In reviewing and commenting on the TransWest DEIS, WRA and environmental organizations recommended that the BLM develop a supplemental GOEA document for public review and comment that includes a much more comprehensive list of mitigation options. Given the growing concern for these majestic birds, especially related to mortalities associated with wind farms and expanding transmission infrastructure, any development decisions that will impact GOEA must be placed within a regional population context much larger than the area immediately surrounding any proposed transmission project. We note that spatial buffers for GOEA nests, as is done for Bald Eagles in most field office planning areas, should be 1.0 miles.	Comment noted. Due to the wide spacing and large diameter of conductors, TWE is expected to provide minimal electrocution and collision risk to golden eagles. Seasonal restrictions and nest avoidance buffers recommended by the USFWS and state wildlife agencies are listed in Section 3.7.4.3 of the Final EIS. Proposed mitigation measure WLF-8 would require TWE to comply with APLC (2012) guidelines to further minimize collision risk to eagles.
Western Resource Advocates	565-1281	For unavoidable impacts, compensatory mitigation is required to replace the loss of habitat and/or other resource functions. Methods of providing compensatory mitigation include resource restoration, establishment (creation), enhancement, and, in certain circumstances, preservation. The FEIS must include a mitigation program that fully addresses impacts to wildlife habitat, Lands with Wilderness Characteristics, and other resources and values. In accordance with BLM policy, the following factors indicate that off-site mitigation is appropriate for this project: - TWE is a major electrical right-of-way project, one of the types of large development projects for which offsite mitigation (at the scale necessary) may be appropriate;- TWE is likely to affect resources and values of high public importance; and - TWE may have permanent impacts that cannot be mitigated on-site. BLM has recently published a Draft Regional Mitigation Manual that includes requirements and guidance on off-site mitigation. President Obama also recently issued a Presidential Memorandum on improving siting, permitting and mitigation for transmission development. Both of these documents offer valuable tools for continuing to improve the conservation outcomes for mitigation for project impacts, and should be used to improve mitigation for TWE in the FEIS.	The Draft EIS includes mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS.
Western Resource Advocates	565-1284	Or, if Lands with Wilderness Characteristics are damaged by TransWest, amendments should be made to the Resource Management Plan for the region to protect other, equally valuable Lands with Wilderness Characteristics near the area of impact.	As stated in Section 3.20.1 of the Draft EIS, Section 201 of FLPMA requires the BLM to maintain, on a continuing basis, an inventory of all public lands and their resources and other values, which includes wilderness characteristics. Section 201 also provides that the preparation and maintenance of the inventory shall not, by itself, change or prevent change of the management or use of public lands. Since many of these units have not been provided with administrative decisions to protect those characteristics through a land use plan, impacts to all inventoried units are documented where they would occur to update the inventory and inform decision-making (as identified in Section 3.20.6.2 of the Draft EIS). Therefore, there is no RMP decision related to these units that requires an amendment.
Western Resource Advocates	565-1285	Additions of lands and resources should equal or exceed the value of any resources or values which are lost. BLM and Western should also make a determination about the value of the habitat to be impacted and establish mitigation requirements for the specific habitat types impacted.	A variety of mitigation strategies are being considered, including avoidance, minimization, and potentially, compensatory mitigation are being considered by the lead agencies' and the applicant. Proposed mitigation measures are disclosed in the Chapter 3 resource sections as well as Appendix C of the Final EIS.
Western Resource Advocates	565-1286	Effective mitigation could be gained through some combination of three primary mechanisms; however, requirements should ensure that the majority of mitigation efforts be focused on the first two mechanisms, with the highest priority given to acquisition. - Purchase of additional private lands to be put in the federal estate under conservation management to guarantee the maintenance of the equivalent or better values and resources lost on the project site. - Additional conservation designations on existing federal lands that would permanently protect the equivalent or better resources and values lost on the project site, or - Restoration efforts to improve the quality and quantity of equivalent resources and values off-site.	A variety of mitigation strategies are being considered, including avoidance, minimization, and potentially, compensatory mitigation are being considered by the lead agencies' and the applicant. Proposed mitigation measures are disclosed in the Chapter 3 resource sections as well as Appendix C of the Final EIS.
Western Resource Advocates	565-1289	We support Habitat Equivalency Analysis (HEA) methods that precisely define mitigation needed to offset both short and long-term project impacts and benefit affected populations while still maximizing landscape-scale conservation. The BLM must adopt a HEA process that models actual sage grouse habitat use to identify the strongest habitat predictors. The approach most environmental groups including WRA recommend for Transwest Express is based on project-specific modeling efforts, similar to the USGS Wyoming Basin Ecoregional Assessment (WBEA) sage-grouse models. We suggest that the TWE HEA focus on (1) defining the best model for the purposes of valuing habitat proposed for development (vs. habitat proposed for preservation or mitigation) and on (2) the effects of transmission lines and structures themselves.	Comment noted. The TWE HEA process is based upon current resource knowledge and the best available information provided through consultation with applicable wildlife management agencies. The applicant anticipates completion of the HEA process concurrent with the release of the TWE FEIS. No change to text.

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Commenter Name	Comment ID	Extracted Comment	Response
Western Resource Advocates	565-1290	Mitigation Recommendations Specific for Greater Sage-grouse: WRA and other organizations collectively stress that avoidance of critical habitat and minimizing disturbances should occur before compensatory mitigation. Where appropriate, however, effective off-site mitigation strategies will be an important tool to consider in management of GRSG. We are optimistic that refinement of HEA for sage-grouse can lead to sound development with lasting conservation benefits (see previous section addressing the HEA). Identification of appropriate sites for off-site mitigation for GRSG is critical. This species has an unprecedented amount of data that has been examined in recent years, which can serve as valuable tools in identifying and prioritizing potential locations. A comprehensive spatial analysis is needed to determine either (1) those areas where a critical habitat component is missing or (2) those areas that support large populations of sage-grouse and are at high risk for wildfire, invasion of cheatgrass, or other threats. In 2010, Doherty et al. developed a scientifically valid range-wide conservation planning tool based on density of males on leks. This has been subsequently recognized as a valuable tool by USFWS, BLM, and state agencies. States have also begun to prioritize GRSG habitat. In 2012, the Nevada Department of Wildlife published its sage-grouse habitat categorization analysis, which delineated five classes of sage-grouse habitat ranging from essential/irreplaceable habitat to unsuitable habitat, and which can be used to direct mitigation and conservation efforts within Nevada. Our organizations refer the BLM to the USGS Summary Report, specifically Section IV (Factor D: Policies and Programs Affecting Sage-Grouse Conservation) for a more detailed review of existing state programs that could assist in identifying and prioritizing mitigation opportunities. BLM's comprehensive National Planning Strategy focuses on developing and implementing GRSG conservation policies across the bird's range are one of the highest level species recovery efforts in the history of the western United States. The BLM's emphasis for protecting and managing GRSG habitat incorporates the following principles: 1) Protection of unfragmented habitats; 2) Minimization of habitat loss and fragmentation; and 3) Management of habitats to maintain, enhance, or restore conditions that meet GRSG life history needs. The Sage-Grouse Conservation Objectives Team, led by several Western Governors, published a draft report (COT Report) in February 2013 that also supports protecting key habitats through "an avoidance first strategy" to retain management options. The reports points out that the best way to protect the most valuable and essential remaining habitat and further recovery goals is to provide assured protections to the most important remaining sage-grouse habitat. Further, these lands should be identified and protected with prioritization afforded to: - core/priority habitats lands, - adjacent or stand-alone habitat where large intact blocks remain, (including those in non-core habitat), and- special habitat types which may be limited within a given area (breeding, nesting, brood-rearing, winter, and connectivity habitats). Multiple-use management does not "mandate" allowing all uses on all lands. BLM retains the discretion to prioritize, weigh various resource mixes, and choose between various multiple uses throughout the project planning area. Because so much of the eastern portion of GRSG range has already been leased for energy development and subsequently fragmented, BLM needs to aggressively pursue avoidance where that proven strategy remains available.	Thank you for your comment. Adjustments to the alignment of the Agency Preferred Alternative have been made to, in part, avoid or minimize impacts to greater-sage grouse habitat. Final siting of TWE facilities would be in accordance with BLM- and USFS-approved greater sage-grouse land use plan amendments in place at the time of the ROD. Additional mitigation regarding the siting of the project in greater sage-grouse habitat, and avoidance and minimization of impacts to greater sage-grouse lekking, nesting, brood-rearing, and wintering habitats, are included in the Final EIS (see additional mitigation measure SSWS-5, which has been revised and expanded from that presented in the Draft EIS). Decisions regarding compensatory mitigation will be addressed by the lead agencies following completion of the HEA process.
Western Resource Advocates	565-1291	Mitigation Recommendations for Golden Eagles - Compensatory mitigation for retrofitting of lethal power poles in the region should be considered for the first five years of operation. - A much more comprehensive list of mitigation options be developed with stakeholder input. - Consider a large scale, well-funded, professional (as opposed to volunteer) rehabilitation program for all injured eagles with a focus of substantially increasing the number that can be successfully, permanently and demonstrably released back into the wild as additional mitigation for the take associated with this and other transmission and generation projects.	As discussed in Section 3.8, the probability that eagles would be electrocuted by the Project is low due to the wide spacing of conductors and other charged transmission line components. Conductor spacing is lower on the overhead distribution lines associated with the ground electrode beds but these facilities are only expected to be energized approximately 30 hours a year on average. Thus, the potential for these facilities to electrocute eagles and other raptors is also low. The likelihood of electrocution is further reduced by TWE's commitment to meet or exceed raptor-safe design standards contained in APLIC (2006). Additional mitigation that would require TWE to minimizing avian collision risk through conformance with APLIC (2012) standards has been added to Section 3.8 of the Final EIS.
Western Resource Advocates	565-1292	For phased build-out options 2 and 3 given market conditions, TransWest contemplates constructing either the northern or the southern section with AC lines and linking them to a shorter section of DC. Should option 2 or 3 be deployed, TransWest should plan to upgrade existing AC transmission lines wherever possible.	Design Option 2 (DC from WY to IPP, AC from IPP to Marketplace Hub) would include an AC configuration from IPP to Boulder City. There are existing AC transmission lines that the applicant may choose to upgrade as part of their system if this option were exercised. Design Option 3 (phased build out) would include an AC configuration (built to DC specifications) from Rawlins to IPP for a temporary amount of time while the converter stations and transmission line from IPP to Boulder City were completed. Once those portions were completed, the AC portion would begin DC operations as well. Therefore, upgrading existing AC transmission would not be possible under this option.
Western Resource Advocates	565-1293	Ensuring reclamation of disturbed habitat with native species will require a plan informed by the best available science as well as a rigorous inspection program to achieve goals and objectives in the short-, medium- and long-term. The University of Wyoming's Wyoming Reclamation and Restoration Center (WRRC) is an interdisciplinary program should be used to help meet the challenges of restoring these disturbed ecosystems.	Reclamation practices will be outlined in the Reclamation Plan developed as part of the of the Construction, Operation, and Maintenance Plan. As defined in mitigation measure VG-3, the reclamation plan would define reclamation success in defined by each management agency. Mitigation measure VG-1, requires that seed mixes to be used for reclamation would be developed in consultation with land managers crossed by the project, and meet the requirements of the land agencies where they have jurisdiction.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Western Resource Advocates	565-1294	Conservation easements are being increasingly utilized as a tool for the permanent conservation of private lands in the United States, especially valuable in keeping landscapes intact and habitat unfragmented. However, conservation easements were inadequately addressed within the DEIS. The lack of consideration of these legal agreements and their location in relation to the proposed alternatives limits the ability of reviewers to evaluate the impacts associated with developing particular segments. The challenges presented by the Tuttle Ranch Conservation Easement in Colorado are illustrative of the issue. Even though micro-siting options are outlined in the DEIS (2-40), the document fails to fully represent the challenges on the landscape – including the nearby substantial easement being pursued by NRCS and the Colorado Cattlemen's Association. Independent review by one of our organizations, using the National Conservation Easement Database, identified unreported conservation easements which overlap proposed routes. This information, in addition to outreach to major entities involved in conservation easements, should be included in the FEIS analyses for impacts by individual segments. From the public's perspective, this failure reduces the ability to minimize impacts and the upfront opportunity to identify site-specific mitigation locations. Failure to identify conservation easements raises concerns about possible delays and complications for this transmission route, as unknown conservation easements are identified later in permitting process. BLM should make every effort to identify existing and proposed conservation easements which might fall within the transmission corridor, including outreach to major entities involved in recruitment and management of conservation easements. This information, summarized by segment number, should be included in the FEIS.	The conservation easement discussion in Section 3.14 was augmented as needed to include conservation easements overlapping proposed routes, including the easement currently being pursued by NRCS and the Colorado Cattlemen's Association. However, it is important to note that conservation easements that are still in progress may not be included in the National Conservation Easement Database. The EIS team consulted with applicable agencies to identify existing and proposed conservation easements. Any proposed conservation easements were included in Section 3.14.
Western Resource Advocates	565-1295	Potential Ground Electrode Siting Areas This land disturbances were not adequately discussed during scoping or within the DEIS. Recommendations: - The full potential impact of each siting area must be fully presented and justified in the FEIS. - Develop only the smallest number possible and select those based on the least environmental impact. This would include Eight Mile Basin in the north because it is comparably the lowest impact.	Section 2.4.3.2 of the Final EIS was revised to include detailed descriptions of the ground electrode systems. The potential disturbance from these systems is disclosed in Section 2.5.1 of the Final EIS. Potential impacts from the ground electrode systems are disclosed in each of the resource sections within Chapter 3.
Winder, Travis	467-499	on the top where they are proposing a line to go through would be up on top of Avinta Quin, Reservation Ridge Road. With the line running across that, the property owners up there, we only have very limited flat on the top and then everything just drops off steep off the backside. So any line or any – how would you pronounce it? Intrusion into that property line, it is just going to pretty much eliminate all the property owners up there because they won't be able to utilize their ground because anything they have left is going to be the south facing slope of the mountain.	The subsection in Section 3.14.6.2 (Impacts Common to All) on Residential and Other Built Environment was augmented to indicate that although it is not anticipated that occupied residences would be removed within the 250-foot-wide transmission line ROW under any alternative, the project could use buildable areas of the property that preclude additional development or use.
Winder, Travis	467-500	I think they would be better off to come down lower like -- what's the other line called? The Gateway South Transmission line? They've looked at that, and they are thinking about going a little lower than coming off the top of ridge just to get down in to where it's not so steep and traverse up there.	The range of alternatives presented in the Final EIS incorporates your suggestions. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Winder, Travis	467-501	The other thing would be the wildlife at the very top of Avinta Quin Reservation Ridge by the campground, that's a fawning area for the deer. That's their only water source. They have tanks up there for them. Otherwise, they have to go clear off the bottom of the canyon to water, so they hang out there. I guess they call that the fawning area.	Comment noted. Information regarding sensitive big game habitats designated by respective state wildlife agencies is presented in Section 3.7.4.1. Spatial data for these habitat designations provided by state wildlife agencies is included in the impacts analysis.
Wyoming Business Council	462-474	The Wyoming Business Council is pleased to see you have published the Draft Environmental Impact Statement for the TransWest Express Transmission Project (TWE Project). Thank you for your hard work to achieve this important milestone and to develop such a comprehensive document. We now urge the Bureau of Land Management and Western Area Power Administration to apply your best resources to complete the environmental analysis as soon as possible so this project can commence construction.	Thank you for your comment.
Wyoming Business Council	462-475	the construction of the TWE Project can facilitate the further development of Wyoming natural resources in the form of wind energy generation, which will bring even more jobs and economic growth to our State. Without new energy transmission paths from Wyoming, there can be no new energy generation built in energy-rich Wyoming,	Thank you for your comment.
Wyoming Dept of Environmental Quality	463-477	The WQD are requesting that erosion and sedimentation be closely monitored to ensure the impacts to water quality from this project are minimized.	Mitigation will be added to Section 3.4.6.3 of the Final EIS that ties erosion and sedimentation monitoring to the Erosion Control Plan.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Wyoming Dept of Environmental Quality	463-478	Erosion, sedimentation and salt loading have long been concerns in the Muddy Creek Watershed, due to past land use practices combined with the natural geology and climate. Although local cooperators, landowners and the BLM have made great strides in improving land use practices in this watershed in the last 20 years and decreased loading of salts and sediment, the cumulative effects of this project and the extensive energy development in the watershed could have potential to reverse this trend.	Discussion and disclosure of direct impacts including effects from erosion, sedimentation, and salt loading, along with proposed mitigation to minimize these impacts, are contained in Sections 3.3 and 3.4 of the Draft EIS. Cumulative impacts from past, present, and reasonably foreseeable future actions are discussed in Chapter 5.0 of the Draft EIS. The Draft EIS includes design features and proposed mitigation to minimize and/or reduce impacts from the Project on this watershed. However, it is out of the scope of the lead agencies decision for this project to impose mitigation measures for past, present, or reasonably foreseeable future projects currently affecting or that could affect the watershed.
Wyoming Dept of Environmental Quality	463-479	Because of the many potential sources of sediment and salts to Muddy Creek due to erosion, it is important that these sources are monitored so that any problems can be addressed before they create instream problems. The BLM Rawlins Field Office is requiring upland erosion BMP monitoring and reporting in the Atlantic Rim Natural Gas Project (IM No.WYD-03-2013-00S), and the BL1-1 is also analyzing alternatives with similar upland erosion monitoring requirements in the Continental Divide - Creston Project EIS. Because the potential erosion related impacts of this the TransWest Express Project are essentially the same as these projects, it should have the same erosion BMP monitoring and reporting requirements.	Impacts vary greatly between oil and gas development projects and transmission line projects. Oil and gas projects tend to be geographically concentrated, landscape-scale where networks of roads and well pads remain devoid of vegetation for the project life. A transmission line is linear with roads and work areas spread across long distances. Additionally, only permanent access roads remain disturbed for the life of the project with the remainder of disturbed areas revegetated after construction is complete. No edits have been made or additional mitigation prescribed based on this comment.
Wyoming Dept of Environmental Quality	463-480	There are a number of deficiencies in the DEIS regarding impaired stream segments and Total Maximum Daily Load (TMDL) development in the Muddy Creek Watershed. Although segments in the very Upper Muddy Creek have been delisted from the 303(d) List, there have not been any TMDLs developed in the watershed. A lower segment of Muddy Creek, within the Upper Muddy Creek Watershed does remain listed due to habitat alteration. However, in the Lower Muddy Creek Watershed there are 303(d) listings for selenium and chloride, either which can increase with sedimentation, but DEIS omits any discussion of these salt related impairments, or the potential impacts of this project. The FEIS should analyze and disclose potential impacts on the Lower Muddy Creek impairments.	The TMDL will be removed and impaired segment of Lower Muddy Creek will be added to the figures, tables, analyses, and discussions of Section 3.4 in the Final EIS.
Wyoming Dept of Environmental Quality	463-481	Page 3.4-12, Table 3.4-3 Region I: Please note that a segment of Lower Muddy Creek (HUC 1405000403) is on Wyoming's 2012 303(d) List for exceedences of the selenium and chloride criteria for the protection of aquatic life. This information on Lower Muddy Creek should be added to Table 3.4-3, since it is vulnerable to impacts from this project, as section 3.4.6 notes. Additionally, the discussion of the Alternatives should include discussions of potential impacts to the impaired segment.	The impaired segment of Lower Muddy Creek will be added to the figures, tables, and discussions of Section 3.4 in the Final EIS.
Wyoming Dept of Environmental Quality	463-483	Page 3.4-23, Table 3.4-6: As section 3.4.6 notes, potential impacts to water resources from this project include increased ion or salt concentrations. These impacts are often associated with increased erosion of saline soils. However, Table 3.4-6 does not include disturbance in watersheds with impairments from high ion or salt concentrations. Table 3.4.6 should include these watersheds as well, such as Lower Muddy Creek (HUC 1405000403), especially since the majority of this project is within the Colorado River Basin, where salinity is closely monitored and controlled. Table 3.4.6 should include acreages in Lower Muddy Creek for Alternatives I-C and I-D.	Table 3.4-6 of the Final EIS will be updated to include disturbance in watersheds with streams that have ion or salt concentration impairments, including Muddy Creek.
Wyoming Dept of Environmental Quality	463-484	Page 3.4-25, Alternative I-C: The document incorrectly states that the State of Wyoming has developed a TMDL on Muddy Creek. There are NO TMDLS on Muddy Creek; please correct this information. Additionally, as identified in previous comments, a segment Lower Muddy Creek is on Wyoming's 2012 303(d) List for exceedences of the selenium and chloride criteria for the protection of aquatic life. The discussion of this alternative should include potential impacts from increased ion concentrations as a result of this project.	The TMDL will be removed and impairments added to Appendix F and the Impaired Waters table in Section 3.4 of the Final EIS. Impacts from increased ion concentrations discussion will be included in Section 3.4.6.3 of the Final EIS.
Wyoming Dept of Environmental Quality	463-485	Page 3.4-25, Alternative I-D: As identified in previous comments, a segment Lower Muddy Creek is on Wyoming's 2012 303(d) List for exceedences of the selenium and chloride criteria for the protection of aquatic life. The discussion of this alternative should include potential impacts from increased ion concentrations as a result of this project.	Alternative I-D would not cross Muddy Creek. No change will be made to the EIS.
Wyoming Dept of Environmental Quality	463-486	Page 3.4-26, Alternative Connectors in Region I, and Table 3.4-8: As identified in previous comments, a segment Lower Muddy Creek is on Wyoming's 2012 303(d) List for exceedences of the selenium and chloride criteria for the protection of aquatic life. The discussion in this section and table should address potential impacts from increased ion concentrations as a result of this project.	The impairments will be added to Appendix F and the Impaired Waters table in Section 3.4 of the Final EIS. Impacts from increased ion concentrations discussion will be included in Section 3.4.6.3 of the Final EIS.
Wyoming Dept of Environmental Quality	463-487	Appendix F, Page F-2: Lower Muddy Creek is not identified in this table for either Alternative I-C or I-D. Additionally, the impairments for selenium and chloride are not listed either.	The NHD Dataset does not distinguish between Upper and Lower Muddy Creek, but only identifies Muddy Creek. Appendix F of the Draft EIS indicates that Alternative I-C would cross Muddy Creek three times and that Alternative I-D would not cross Muddy Creek. The impairments have been added to Appendix F and the Impaired Waters table in Section 3.4 of the Final EIS.
Wyoming Dept of Environmental Quality	463-488	Appendix F, Page F-9: There are NO TMDLS on Muddy Creek.	Appendix F and the Impaired Waters table in Section 3.4 of the Final EIS have been corrected to reflect no TMDLs on Muddy Creek.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Wyoming Game and Fish Department	176-245	We reiterate our recommend for construction to occur outside of November 15-April 30 in designated and mapped big game crucial winter ranges in Wyoming.	Comment noted. Per Applicant-committed measures TWE-31 and TWE-32, TransWest would adhere to mitigation developed in conjunction with state authorities and seasonal restrictions to mitigate impacts on wildlife. The TWE Biological Protection Plan would incorporate seasonal restrictions and stipulations contained in the lead and cooperating agency RODs and could include restrictions on winter construction in designated big game crucial winter ranges.
Wyoming Game and Fish Department	176-246	For edification purposes, please note that the correct genus/species for elk is cervus elaphus not cervus canadensis as is found in the document.	There is some disagreement in the literature over the correct taxonomy for North American elk. Several sources still use the scientific name Cervus elaphus as the commenter suggests. Some sources also include subspecies names of C. e. nelsoni and C. e. canadensis in reference to Rocky Mountain elk. However, a study of mitochondrial DNA completed in 2004 indicates that North American elk are not closely related to the European red deer (C. elaphus) and should instead be identified as C. canadensis. Additionally, both the Utah Division of Wildlife Resources and the Wyoming Game and Fish Department (in Atlas of Birds, Mammals, Reptiles, and Amphibians of Wyoming; WGFD 2012) use the scientific name C. canadensis in referring to elk. No text edits made.
Wyoming Infrastructure Authority	466-493	First, we congratulate the Bureau of Land Management (BLM) and Western Area Power Administration on reaching this important milestone, and applaud the two agencies for their diligence and hard work in preparing this thorough and comprehensive document for public review and comment. We also appreciate the extensive 90-day comment period provided, which gives everyone more than adequate time to review and comment on the Draft EIS. Clearly, you have admirably met your NEPA obligations and ensured the public's participation in the process. The document is well-organized and easy to access and review.	Thank you for your comment.
Wyoming Infrastructure Authority	466-494	Second, the pace of the federal environmental analysis and permitting literally controls the entire project development schedule. TransWest Express LLC submitted a federal right-of-way application to BLM in December 2008. We request that you complete the remaining steps in the environmental analysis for the TransWest Express transmission line as quickly as possible, to ensure this project is cleared to commence construction as soon as possible in 2014. It remains a high-priority energy infrastructure, as designated in October of 2011 by the Federal "Rapid Response Team for Transmission".	Thank you for your comment.
Wyoming Infrastructure Authority	466-498	If BLM moves forward with another alternative route unacceptable to the general public, we are concerned the TWE Project would risk further permitting delays, denying our region and its workers the economic development boost needed today and putting the TWE Project 's market viability in jeopardy.	Thank you for your comment. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Wyoming Office of State Land & Investment	174-241	As mentioned in previous comments, notwithstanding the federal NEPA process or federal approvals, the project proponent must comply with the Rules and Regulations adopted by the Board of Land Commissioners in accordance with W.S. 36-2-107 and W.S. 36-9-118, in the event that development occurs on, or it is necessary to traverse, state lands. The project proponent must secure an easement or special use lease, pursuant to Board of Land Commissioner rules, regulations and policies in place at the time of application. As a supplement to the current easement forms, the applicant will be required to provide satisfactory responses to the following questions upon initial submission to OSLI: 1. Description of all adjacent uses undertaken on the parcel in question and the surrounding parcels; 2. Description of opportunities to route the proposed easement within an existing easement or use; and 3. Opportunity to reroute the proposed easement use off of state trust lands (and description of the effect on adjacent landowners, if any).	Appendix A of the Draft EIS identifies the need for ROW easement from the State of Wyoming State Land Board, pursuant to WS-20 and 36-20. Appendix A will be updated to include reference to WS 36-2-107 and 39-9-118.
Wyoming Office of State Land & Investment	174-242	This office appreciates the opportunity to comment and would strongly encourage the proponent of the project to maintain continued interaction with the office to ensure that all pertinent statutes, rules, regulations and policies of the Board of Land Commissioners are adhered to so unnecessary delays can be avoided in the project. The office suggests that the applicant provide the specific, proposed routing of the project, as it relates to state trust lands, as soon as possible to streamline the permitting process at OSLI and preclude the need to re-engineer the project to accommodate the interests of the state trust land beneficiaries.	The lead agencies' decision will require that the TransWest comply with all pertinent statues, rules, regulations and policies for all lands and resources regulated by Federal, State, and local agencies. The specific routing for the project will be identified in the Record-of-Decision for the project and will be further refined based on site-specific surveys conducted prior to construction. Throughout this process, TransWest will be required to coordinate with OSLI to ensure that all regulatory requirements related to state trust lands are met.
Wyoming Wildlife Federation	177-1589	WWF applauds the employee biological education program that will be provided to train employees to identify areas of concern for wildlife and habitat. We would encourage expanding the program to include Employees should complete a mandatory Environmental Awareness Training Program to educate employees about public land laws and current Game and Fish regulations.	The applicant has committed (Design Feature TWE-32) to ensuring that construction and operations staff are provided information regarding all sensitive resources potentially impacted. Providing educational resources regarding general public land law and state game and fish regulations, as they relate to sensitive resources, will be included in the awareness program.

Table L-1 Response to Substantive Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Wyoming Wildlife Federation	177-1590	<p>Worker associated impacts:</p> <ol style="list-style-type: none"> 1. Any man camp should be fenced to exclude livestock and wildlife. 2. Prevent squatting on public and private lands by providing RV spaces and associated facilities. 3. Mandatory reprimand or dismissal for employees convicted of poaching or harassing wildlife while employed by the company, its contractors, or subcontractors. 4. Guns should be prohibited on any job site. 5. Guns at construction camps should be signed-in and kept in gun lockers. 6. Dogs should be strictly prohibited on any job site and adequately secured at man camps. 	<p>Thank you for your suggestions regarding design and operational policies associated with any man camp, job sites, and employee conduct. No man camps are being proposed as part of this project. With the exception of extended camping on public lands, which is limited by regulation, the other policies and procedures are primarily within the purview of the Project proponent, other state and federal laws and regulations, and local jurisdictional authority. No changes were made to the FEIS in response to this comment.</p>
Wyoming Wildlife Federation	177-1591	<p>Transporting construction crew:</p> <ol style="list-style-type: none"> 1. Bus crews whenever feasible to prevent disturbance of wildlife and avoid vehicle collisions. 	<p>The use of buses to transport construction contractors personnel is not proposed, required, or recommended to reduce anticipated wildlife or safety impacts caused by individual vehicle trips. Any issues regarding local transportation will be addressed at the local level with the applicant.</p>
Wyoming Wildlife Federation	177-1592	<p>Timing Stipulations:</p> <ol style="list-style-type: none"> 1. Stop construction during big game crucial winter range from November 15 to April 30. 2. Limit construction efforts during big game hunting season if the route is being constructed in a high value hunting area. 3. Limit construction efforts from May 15 until July 5 in mule deer and elk parturition areas. 4. It is especially important to avoid disturbance of mule deer while on winter range as increased activity has the potential to increase physiological stresses. 	<p>Comment noted. The applicant has committed to project conformance with all applicable state and BLM stipulations regarding designated big game crucial winter ranges and parturition/fawning areas. This information is provided in Section 3.7.6 and Appendix C, Table C.2-1, of the Final EIS. Mitigation measures REC-4 and REC-5 in Section 3.13.6.9 of the Draft EIS address construction during big game hunting seasons.</p>
Wyoming Wildlife Federation	177-1593	<p>Reclaim all lost habitat:</p> <ol style="list-style-type: none"> 1. Reclaim lost habitat as soon as feasible. 2. Make reclamation of the Red Rim/Daley Wildlife Habitat Management Unit a priority. 	<p>Comment noted. Reclamation of temporary use areas would commence upon the completion of construction activities as feasible. Reclamation details are described in the Project Description Technical Report (DEIS Appendix D).</p>
Wyoming Wildlife Federation	177-1594	<p>3. Reclaim and require mitigation and long-term monitoring and treatment if necessary of noxious weed infestations associated with construction of the project. Included within this create pre-mapping and post-mapping treatment of vegetation.</p>	<p>Mitigation measures NX-1, and VG-3, provide requirements for reclamation, and mitigation for noxious weeds including mapping, treatments, and monitoring.</p>
Wyoming Wildlife Federation	177-1595	<p>Aquatics:</p> <ol style="list-style-type: none"> 1. Prevent the spread of Aquatic Invasive Species by following all Wyoming Game and Fish Department recommendations, including but not limited to decontamination of equipment. 2. Reduce sediments. 3. Avoid crossing of streams by utilizing existing roads. 4. Reduce the number of culverts used. 	<p>Design features, BMPs, and agency management direction will be followed to reduce these impacts, as discussed in Section 3.9.6.2.</p>

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
American Wind Energy Assoc.	695-1912	The TWE Project will allow otherwise stranded Wyoming wind energy resources to be delivered to markets that can benefit from this clean power in the Desert Southwest. In fact, Western's current development partnership with TransWest is based on its determination that the TWE Project will facilitate the delivery of renewables as required by its Transmission Infrastructure Program.	Thank you for your comment.
American Wind Energy Assoc.	695-1915	an expanded transmission grid can improve reliability and reduce costs to consumers by reducing congestion, providing access to lower cost resources, increasing competition and facilitating more efficient use of the grid and generation resources.	Thank you for your comment.
Anadarko Petroleum Corp	571-1356	Under the affected environment discussion of the DEIS, there is no mention of oil shale or other valuable mineral types which have gained notoriety over the past few years. While generally considered uneconomic to recover, at the current price of oil, this will change during the 50 year lifetime of the Project.	Thank you for your comment.
Anadarko Petroleum Corp	571-1356	Under the affected environment discussion of the DEIS, there is no mention of oil shale or other valuable mineral types which have gained notoriety over the past few years. While generally considered uneconomic to recover, at the current price of oil, this will change during the 50 year lifetime of the Project.	Thank you for your comment.
Anadarko Petroleum Corp	571-1366	Mitigation measures for all potentially recoverable minerals on Federal, state and fee mineral resources are included as conditions of approval in the ROWs.	It is expected that the applicant would resolve conflicts with regard to mineral ownership and access. Please see response to comment 605-859 for more details.
Andrus, Brock	405-597	the agency proposed route goes through the east side of our permit. And our permit has an awful lot of trees on it. But on the east side there is a burn, so it's been burned and re-seeded. So, it's, I guess, one of the very best parts of our allotment. And I guess we would just be a little concerned about the degradation of the range there. And I'm certain they'll replace the fences and that kind of stuff. But it just looked to us like if we had any input, that the pink route, the one that I think the power companies would rather use, looked like a lot better deal. Looked like, to us, it made more sense, cheaper, and cost the taxpayers less and, obviously, would not disrupt our allotments. So, I guess I just wanted to go on record of kind of saying we had those concerns.	Thank you for your comment.
Baker, Catherine	191-700	As descendants of the victims killed at the Mountain Meadow Massacre, we would like to present you with our concerns for the TransWest Power line and the "Applicant's Preferred Route" through the Mountain Meadow Area. We hope you will consider our concerns for our ancestor's graves and avoid Mountain Meadow all together; instead, we hope to see the power line take the "alternate route" to the east of the "Applicant Preferred Route," for the following reasons: There is a very, high likelihood that human remains and cultural items may be unearthed during construction of the towers.	Thank you for your comment.
Baker, Catherine	191-704	Lastly, we must protest the intrusion of a high voltage power line over the graves of our ancestors if, for no other reason; because, it was the wishes of Captain John Twitty Baker in his last will and testament. "Like many emigrants, Baker dreaded the thought of his bones left unburied and exposed to the sun, the wind, and the wolves." Shannon Novak describes "Baker's immediate purpose was to ensure his proper interment: "First, I will at my death my body a decent burial in the bosom it I's [sic] mother Earth and my spirit to the God who gave it (Novak 149).	Thank you for your comment.
Baker, Randy S.	472-1368	We believe the sacred, serene and peaceful Mountain Meadows Massacre/Gravesite in Washington County, Utah, MUST be protected and preserved and not considered for a path of this or further power lines.	Thank you for your comment.
Baker, Randy S.	472-1369	Our group would like to encourage/plead that TransWest Express choose a far west alternate route. Preferably through Nevada and go nowhere near the Mountain Meadows Massacre/Gravesite Valley. The Maps appear to have the option of running through the Nevada desert instead of Dixie National Forest, population areas in Utah and Mountain Meadows. This route would also avoid the edges of the Paiute Indian Reservation in Washington County, UT.	Thank you for your comment.
Barker, Candy	407-599	Gateway South. I would like to ask them if they could stay on BLM property like some other transmission lines are. She doesn't have enough property to give them 250 feet right away. They would have to put it in the middle of her house. That's not going to happen.	Thank you for your comment.
Battle Pass Scenic Byway Alliance, Inc.	424-627	One of the most important in the West is wildlife. And a big concern of mine is the sage grouse. This has less impact. The route that TransWest is describing, Alternate I-A, has less impact than the other route does.	Thank you for your comment.
Battle Pass Scenic Byway Alliance, Inc.	424-628	All the environmental impact was written out as -- what BLM has proposed, their own study doesn't support what they're trying to propose, and that's a major concern to all of us that are involved with developing tourism in this corner of Wyoming.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Battle Past Scenic Byway Alliance, Inc.	379-571	The visual impacts, as presented by the BLM people to our County Commissioners for the BLM Agency preferred Alternative Route are very concerning, specifically as it relates to tourism and how it impacts WYDOT 789 and WYDOT 70. It took 20 years and 5 attempts to get the Battle Pass Scenic Byway designated. It is Wyoming's 16th scenic Byway and runs between Baggs and Encampment. It is a key element in building tourism as a stronger economic base in southern Carbon County.	Thank you for your comment.
Battle Past Scenic Byway Alliance, Inc.	379-572	Obviously a major goal is to foster more tourism and the western gateway road of WYDOT 789 is very important to maintain the visual integrity of the views from these highways. We do not want to compromise the these roadways.	Thank you for your comment.
Battle Past Scenic Byway Alliance, Inc.	379-573	This is a last slice of the old west and the towns of Baggs, Dixon, Savery, Encampment and Riverside and all of southern Carbon County are looking forward to increased tourist traffic.	Thank you for your comment.
Battle Past Scenic Byway Alliance, Inc.	379-574	Abandon the gold BLM Agency preferred Alternative i-D route as this route has far more visual impacts to Highway 789 as shown in the visual simulations. More than HALF of this highway would have the view of the Transmission lines alongside it. This is not smart planning for an area trying to improve our tourist economy, a very important Wyoming industry.	Thank you for your comment.
Battle Past Scenic Byway Alliance, Inc.	379-575	Abandon the red/black "Baggs Alternative Connector" route as it would have major visual impacts to Highway 789 which is a key gateway to WYDOT 70 and our Battle Pass Scenic Byway.	Thank you for your comment.
Battle Past Scenic Byway Alliance, Inc.	379-576	Abandon the blue Alternative i-C route for the same reasons and also the impacts to Baggs and it citizens.	Thank you for your comment.
Battle Past Scenic Byway Alliance, Inc.	379-577	Please choose Alternative I-A in the final Environmental Impact Statesmen for Region I The BLM visual simulations show that I-A is the least visible for people visiting Carbon County and for those residents that regularly use WYDOT 70 and 789. Chairman Leo Chapman acknowledged this in the Commissioner meeting as reported in the article of the Rawlins Daily Times. This route was the preferred Alternative I-A that was selected with the neighboring county commissioners in Sweetwater County, Wyoming and Moffat County, Colorado. The Draft EIS clearly shows that I-A in Region I has the least miles of disturbance, the least miles of access roads required, the "the least overall impact of soil resources," the least ground disturbance, and the fewest stream crossings.	Thank you for your comment.
Battle Past Scenic Byway Alliance, Inc.	379-578	I want it clearly understood, as an individual, I fully support this TransWest project. It will bring important economic benefits to Carbon County as will the Scenic Byway region. The key is to have the least impact possible on each other or both may suffer. Only Alternative I-A fits that option.	Thank you for your comment.
Bellah, Jerry	185-694	This project will bring many high paying jobs in the Line Construction Trade to the state of Colorado as well as Wyoming, Utah and Nevada. I have worked closely with educational institutions across the state of Wyoming who are patiently waiting for this project to begin so their students can take advantage of the opportunities that the TransWest Project will provide.	Thank you for your comment regarding the economic opportunities that you and others envision in conjunction with the proposed project. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in the FEIS.
Bellah, Jerry	185-694	This project will bring many high paying jobs in the Line Construction Trade to the state of Colorado as well as Wyoming, Utah and Nevada. I have worked closely with educational institutions across the state of Wyoming who are patiently waiting for this project to begin so their students can take advantage of the opportunities that the TransWest Project will provide.	Thank you for your comment regarding the economic opportunities that you and others envision in conjunction with the proposed project. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in the FEIS.
Bellah, Jerry	185-696	First, you will protect more natural resources by getting smart, critical infrastructure like the TWE Project built and operating, because it will make the entire Western United States power grid even stronger and more reliable, AND allow this region to use more clean wind energy (which, building generation creates even more economic value and jobs). Having reliable, low-cost electricity is the foundation of America's success, but our transmission grid needs more investments to keep up with our growing electrical needs of society	Thank you for your comment.
Bellah, Jerry	185-697	Second, how are you going to supply the most cost-effective renewable energy resources to "power our future" if you don't get transmission lines done today that will deliver those supplies to the people who need it? Please accelerate whatever remaining paperwork you have to complete for the TWE Project and let us get started actually BUILDING this line. The significant jobs and tax benefits you talk about in the Draft EIS, and the fact this project is being jointly developed with funding meant to help stimulate economic recovery and activity, makes the extended permitting time you're taking even more unconscionable. There are thousands of direct, indirect and induced jobs described in the Draft EIS that you are holding back every day you don't finish this permitting process.	Thank you for your comment.
Bellah, Jerry	185-698	America's union professionals could have built the TWE Project three times over in the time you've taken to study it. The Bureau of Reclamation website says that all of Hoover Dam was built in less than 6 years, and you're taking 6 years just to do a bunch of studies and paperwork. I request that you expedite whatever NEPA steps you have left and allow multiple-use public lands be used to economically benefit the public and create American jobs as soon as possible.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Big Mountain Campground and Ockey's Ranch	440-746	Why is it necessary to completely destroy the beauty and the historic nature of a 100 plus year old ranch and pioneer homestead in the heart of Salt Creek Canyon by forcing another power line with its 80-plus foot unsightly towers and lines that crackle and pop with sounds that disturb inhabitants nearby? There are other routes that would be less damaging both to the beauty of the area and to the property values and livelihood of the property owners.	Thank you for your comment.
BLM - Caliente Field Office	699-1790	Table 2-25, page 2-104 My review of this table leads to the conclusion that there are generally, numerically more impacts across resources for Alt II-B, the agency preferred alternative, as compared to II-A and III-C.	Thank you for your comment.
Bradfield, Randall	411-603	It is the segment 219.60. And we don't like that route, because it goes right through our property. Right in the middle.	Thank you for your comment.
Bramall, Max	413-607	I did power line surveying for eight years. I am glad the agency wants to go the green route. The green route is much better than the proposed blue route that they had. In my opinion, it's definitely much better.	Thank you for your comment.
Burnett, Bruce	602-833	I hope you will consider my concerns for our ancestors graves and avoid Mountain Meadows entirely. I respectfully request that the power line take the alternate route to the east of the Applicant Preferred Route for the following reasons:-- I protest the intrusion of high voltage power lines over the graves of my ancestors.	Thank you for your comment.
Camelletti, Doug	414-608	Personally, I strongly believe that route I-A, endorsed by multiple sources not limited to TWE's experts, is the best possible track for the transmission line. I understand that the BLM prefers Alternative I-D, which is close to the proposed route in Moffat County but definitely different in terms of impact.	Thank you for your comment.
Camelletti, Doug	414-609	I suggest that your committee work to narrow your options at this point so we can all draw closer to completing the transmission line, adding jobs, and helping our environment. For example, Alternative I-C runs through Moffat County directly along Highway 13 and causes unnecessary disturbance to private property owners while traveling far out of the ultimate direction the line needs to take. This leads to increased costs and negative impacts. I'm sure that once the BLM looks through the options again and begins to eliminate the obvious alternatives, you will come to see how beneficial the proposed route is.	Thank you for your comment.
Camelletti, Doug	414-609	I suggest that your committee work to narrow your options at this point so we can all draw closer to completing the transmission line, adding jobs, and helping our environment. For example, Alternative I-C runs through Moffat County directly along Highway 13 and causes unnecessary disturbance to private property owners while traveling far out of the ultimate direction the line needs to take. This leads to increased costs and negative impacts. I'm sure that once the BLM looks through the options again and begins to eliminate the obvious alternatives, you will come to see how beneficial the proposed route is.	Thank you for your comment.
Carbon County Economic Development Corp.	721-1336	we request that you choose Alternative I-A in Region 1, as also chosen by our county commissioners, in the Final EIS. Neighboring Sweetwater County and Moffat County, Colorado worked closely with our commissioners to craft a joint resolution supporting the Alternative I-A route. Not only is this a consensus route, but this is the route that offers the fewest visual impacts to our citizens, requires the fewest miles, has the fewest acres of disturbance, and has the least impacts on historic and cultural resources as clearly explained in the Draft EIS Chapter 3.11/Cultural Resources.	Thank you for your comment.
Carbon County Economic Development Corp.	721-1337	Initial ground disturbance associated with Alternative I-A would be less than the other alternatives. Decreased ground disturbance could decrease the potential for direct impacts to known and unknown historic properties compared to other alternatives.	Thank you for your comment.
Carbon County Economic Development Corp.	721-1338	Under Alternative I-A, historic trail and road crossings would be less than Alternatives I-C and I-D, but similar to Alternative I-B.	Thank you for your comment.
Carbon County Economic Development Corp.	721-1339	Compared to other alternatives, Alternative I-A has fewer acreage sites per 100 acres inventoried with average inventory coverage of 14 percent.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Carbon County Wyoming Comm, Chairman	591-853	The Carbon County Commissioners remain adamantly opposed to the Alternative 1-C route in Carbon County Wyoming. Carbon County believes that Alternative 1-A, (the Consensus route), which follows a corridor preferred by Carbon County and the Governor's Office for the State of Wyoming, and which was adopted in a joint resolution passed by Carbon, Sweetwater and Moffat Counties, represents the best project routing with the least impact on the citizens of Carbon County and particularly those living in the Little Snake River Valley. Our reasons for opposing Alternative 1-C include the following: <ul style="list-style-type: none"> - Proposed Alternative I-C would require the transmission line project to cross Highway 70 between Baggs and Dixon, Wyoming. - A position of Highway 70 between Savory and Encampment, Wyoming, recently received protected recognition as the "Battle Pass Scenic Byway". This designation has taken many years to achieve and is a key element in building tourism as a stronger economic base in southern Carbon County. - The proposed transmission line crossing of Highway 70, although not in the actual Scenic Byway" corridor, would cause severe visual impact to the gateway to this scenic route. - The visual quality of Highway 70 between Baggs and Dixon would be significantly degraded for locals and for the traveling public. - Use of that corridor would also affect many local area ranchers and homeowners, as locating the project in this area would require crossing a large amount of private land holdings. 	Thank you for your comment.
Carbon County Wyoming Comm, Chairman	591-855	Table 2-23, Summary of Impacts for Region 1 consistently demonstrates that resource impacts will be less for the Consensus Route (I-A) than for the BLM Route (I-D). For the reasons provided above, we favor the Consensus Route (I-A) over the BLM Route (I-D), however, the BLM Route (I-D) is still preferable to Alternative I-C, and we would recommend that Alternative I-C be dropped from the FEIS. Carbon County continues to object to proposed Alternative I-B due to its proximity to the Adobe Town, Willow Creek Rim and Power Mountain areas, and would recommend that this route also be dropped from the FEIS.	Thank you for your comment.
Carbon County Wyoming Commissioner	167-212	The Carbon County Commissioners remain adamantly opposed to the Alternative 1-C route in Carbon County Wyoming.	Thank you for your comment.
Carbon County Wyoming Commissioner	167-213	Carbon County believes that Alternative 1-A, (the Consensus route), which follows a corridor preferred by Carbon County and the Governor's Office for the State of Wyoming, and which was adopted in a joint resolution passed by Carbon, Sweetwater and Moffat Counties, represents the best project routing with the least impact on the citizens of Carbon County and particularly those living in the Little Snake River Valley	Thank you for your comment.
Carbon County Wyoming Commissioner	167-214	The Board of County Commissioners for Carbon County believes that the Consensus Route, Alternative 1-A, which is also the Applicant's preferred routing, would best protect the interests of the residents of Carbon County. This corridor has the least visual impact for the Little Snake River Valley and moves the project a respectable distance from the town of Baggs, Wyoming.	Thank you for your comment.
Carbon County Wyoming Commissioner	167-215	We are aware that the BLM has selected Alternative 1-D as their preferred routing. Alternative 1-D would present a number of concerns, particularly in the area of visual impact.	Thank you for your comment.
Carbon County Wyoming Commissioner	167-217	For the reasons provided above, we favor the Consensus Route (1-A) over the BLM Route (1-D), however, the BLM Route (1-D) is still preferable to Alternative 1-C, and we would recommend that Alternative 1-C be dropped from the FEIS. Carbon County continues to object to proposed Alternative 1-B due to its proximity to the Adobe Town, Willow Creek Rim and Power Mountain areas, and would recommend that this route also be dropped from the FEIS.	Thank you for your comment.
Church of Jesus Christ Latter-day Saints	684-876	The Church currently owns approximately 900 acres in the Mountain Meadows of southwestern Utah, including the majority of the Mountain Meadows Massacre National Historic Landmark and a good portion of the Mountain Meadows Massacre National Register District, both of which would be negatively affected by the Applicant-preferred alternative for the proposed Project.	Thank you for your comment.
Church of Jesus Christ Latter-day Saints	684-878	Second, we wish to express our unequivocal support for the Agency-preferred alternative that bypasses the Mountain Meadows.	Thank you for your comment.
Church of Jesus Christ Latter-day Saints	684-880	Given these concerns, we strongly support the Agency-preferred alternative that altogether avoids the numerous challenges inherent in the Mountain Meadows and protects this historically important and sacred from the direct and visual adverse effects associated with the proposed Project. Given our concerns, we can similarly support any one of the three Alternative Variations described in the DEIS (i.e., Ox Valley East, Ox Valley West, and Pinto) because these variations likewise protect the MMM NHL from adverse effects.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Citizens for Dixie's Future	569-1316	Our biggest concern with the proposed transmission line is that what came across as the applicant proposed or industry's preferred alternative would essentially parallel the west side of Utah State Route 18 in the vicinity of the small community of Central , Utah. While we realize this proposed alignment is the shortest alternative and that there is an existing utility corridor, it also is the one, which most negatively impacts Washington County residents and resources, which again would receive no electricity from this project.	Thank you for your comment.
Citizens for Dixie's Future	569-1320	However, because the agency preferred route for the right-of-way actually swings west into Nevada before the proposed line enters Washington County, the small properties in the communities listed above and their market values would not be affected. Instead, the agency preferred route in Nevada mostly goes across public land used mostly for livestock grazing. This route would not have the perceived economic impacts to the ordinary citizens. For this reason and others to follow, we support the agency preferred electrical transmission line route.	Thank for your comment favoring on of the alignment options in Region III. Statements of opinion do not require specific responses or text revisions under NEPA regulations. However, your comment will be considered by the BLM and documented in the administrative record for associated with this EIS.
Citizens for Dixie's Future	569-1320	However, because the agency preferred route for the right-of-way actually swings west into Nevada before the proposed line enters Washington County, the small properties in the communities listed above and their market values would not be affected. Instead, the agency preferred route in Nevada mostly goes across public land used mostly for livestock grazing. This route would not have the perceived economic impacts to the ordinary citizens. For this reason and others to follow, we support the agency preferred electrical transmission line route.	Thank for your comment favoring one of the alignment options in Region III. Statements of opinion do not require specific responses or text revisions under NEPA regulations. However, your comment will be considered by the BLM and documented in the administrative record associated with this EIS.
Citizens for Dixie's Future	569-1324	It also appears that the applicant proposed route would go in a southwesterly direction through occupied desert tortoise habitat in the very southwest corner of Utah. If correct, this means that this proposed transmission line would either cross the Beaver Dam National Conservation Area (NCA), which was designated in 2009, or be located in the narrow utility corridor that was excluded from and bisects the NCA. There is already at least one large transmission line in the utility corridor. Adding this additional and larger transmission line would be very noticeable from within the NCA and degrade the stunning visual resources.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Citizens for Dixie's Future	569-1324	It also appears that the applicant proposed route would go in a southwesterly direction through occupied desert tortoise habitat in the very southwest corner of Utah. If correct, this means that this proposed transmission line would either cross the Beaver Dam National Conservation Area (NCA), which was designated in 2009, or be located in the narrow utility corridor that was excluded from and bisects the NCA. There is already at least one large transmission line in the utility corridor. Adding this additional and larger transmission line would be very noticeable from within the NCA and degrade the stunning visual resources.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Citizens for Dixie's Future	569-1342	Perhaps the biggest negative impact for most people if the Pinto Alternative Route were to be selected would be the long-term cumulative impact of visual change in the natural environment. Presently the natural view shed along the Pine Valley Road is general intact. There are currently interesting natural perspectives all along that road of the vegetation and wilderness mountains, and from the residences. This project if constructed here would certainly add an undesirable industrialized view. This would also diminish some great views of the Pine Valley Mountains from State Route 18. We are strongly opposed to the selection of the Pinto Alternative Route.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Citizens for Dixie's Future	569-1342	Perhaps the biggest negative impact for most people if the Pinto Alternative Route were to be selected would be the long-term cumulative impact of visual change in the natural environment. Presently the natural view shed along the Pine Valley Road is general intact. There are currently interesting natural perspectives all along that road of the vegetation and wilderness mountains, and from the residences. This project if constructed here would certainly add an undesirable industrialized view. This would also diminish some great views of the Pine Valley Mountains from State Route 18. We are strongly opposed to the selection of the Pinto Alternative Route.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Citizens for Dixie's Future	569-1345	In conclusion, CDF supports the agency preferred route 1 for this proposed electrical transmission line.	Thank you for your comment.
City of Henderson	580-905	With these concerns for the City and its residents in mind, the City proposes that the Agency mitigate the viewshed impacts to private land uses presented by the preferred route, by routing the alignment to the east of the preferred route through Alternative IV -B, passing through the northwest corner of the Lake Mead National Recreation Area between the Lake Las Vegas development and Lake Mead and avoiding the developed pinch point area altogether (DEIS ES-12). Fewer residences would be impacted by Project's transmission structures located within this alignment, and would comply with Agency management objectives after mitigation, so as not to dominate the view of the casual observer (DEIS Sec. 3.12-86).	Thank you for your comment.

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City of Henderson	580-906	It is worthwhile to note that Alternative IV-B (unlike the Agency's preferred route as described on DEIS 3.12-84) would avoid the Rainbow Gardens ACEC, which "contains a scenic mountain and canyon landscape similar to those found in more remote locations of southern Nevada, but unique in its close proximity to the city, allowing people a wilderness experience within a few miles of their homes" (BLM/ Areas of Critical Concern; http://www.blm.gov/NV/st/en/of/lvfo/blm_programs/Jvfo_recreation/accessing_your_public/acec_information.print.html)	Thank you for your comment.
Clark County Nevada -Desert Conserv Prg	386-727	The DCP has met with the representatives of the TransWest project with concerns on the location of the Southern Terminal sites in the Eldorado Valley in Nevada. In earlier versions of the project maps, the location of the Southern Terminal site was located within the BCCE. This Draft EIS alleviates our concerns of the proposed location of the Southern Terminal sites with the placement of the site located north of the BCCE.	Thank you for your comment.
Coalition of Local Government	594-1888	The Coalition reiterates its opposition to Alternative I-C due to its proximity to Baggs, Wyoming, the number of agricultural and livestock grazing acres affected, the impact to sage-grouse habitat, and location through the Muddy Creek Wetlands. See DEIS at 2-32, 2-60, 2-65 -2-66.	Thank you for your comment.
Coalition of Local Government	594-804	The Coalition supports the alternative that has the least impact on private lands and sage-grouse habitat, disturbs fewer acres of land used for agriculture and livestock grazing, and avoids the Muddy Creek Wetlands. For these reasons, the Coalition supports the Applicant's Proposed Alternative I-A.	Thank you for your comment.
Coats, Tamara	188-544	I am a property owner on Reservation Ridge where one proposed power line route for TransWest Express Transmission Line Project has been proposed. I am deeply horrified and very much devastated that you would even consider this a possible route for the transmission power line. Have you even taken the time to drive across Reservation Ridge or did you just sit down in your big office and point to a map and say this looks like a good route? The proposed route you have for this power line comes right through the middle of our property. If you did that you would take ever thing from us with the 250 feet right away you demand. What I don't think you understand is that we have had a cabin for over 40 years on that property. If you were to place a value on our cabin: priceless. As you will find with any other property owner you talk to. I have read the TransWest Express mission statement: I have nothing against this, even though Utah will see no benefit from this. However you should not have the right to takeover private property owners land without permission, nor should you be allowed to ruining such a beautiful wilderness area. I have reviewed the proposed alternate routes for this Transmission line and I'm not sure why Reservation Ridge was even proposed as a route. Its not logical or environment friendly. The most sensible route to take would be down below on the flat lands next to Emma Park road. That piece of country already has power lines and oil wells dotting the landscape so another power line would not be out of place. So I'm not just asking you, I'm begging you to not even consider the Reservation Ride route for this TransWest Express Transmission line Project.	Thank you for your comment.
Colorado Parks and Wildlife	685-1300	CPWs comments for this EIS are focused mainly in two areas of concern: 1) the Tuttle Easement micro-siting options one, two, and three where we strongly oppose any option that crosses the easement (micro-siting option #1)	Thank you for your comment.
Colorado Parks and Wildlife	685-1301	CPW has worked with BLM and other agencies to develop the agency preferred route alignment (Alternative I-D) and are in support of that routing alternative from the Wyoming state line to the east side of Cross Mountain Wilderness Study Area.	Thank you for your comment.
Colorado Parks and Wildlife	685-1302	CPW holds a conservation easement on approximately 15,156 acres of crucial wildlife habitats, which lies predominantly on the south side of Highway 40 for a span of approximately 5 miles. CPW strongly opposes the routing of any new transmission line route south of Highway 40 that would cross the Tuttle CE.	Thank you for your comment.
Colorado Parks and Wildlife	685-1304	CPW strongly opposes Micro-siting Option 1 (page 2-40) which traverses the Tuttle Conservation Easement and would negatively impact wildlife to a greater extent than the other alternatives considered. CPW prefers micro-site Option 3 (page 2-40), or any variation of a corridor or transmission line alignment which locates the transmission line north of Highway 40 in relation to the Tuttle CE (as noted on map 2-25).	Thank you for your comment.

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Corporation of the Presiding Bishop-LDS	614-791	CPB prefers and requests that you select the Applicant Proposed II-A corridor in the Final EIS. The II-A corridor is a shorter, more direct route for the TWE Project and follows an existing interstate transmission line in a designated corridor. In contrast, the Agency Preferred Alternative route, or the II-F corridor, is longer and disturbs extensive green field areas. The new line should not disturb new ground by installing extensive new road systems and tower locations when a designated corridor already exists where the new line can be easily located and utilize road systems that are already in place. The II-A corridor clearly offers the fewest impacts on land and resources in Region II and complies most directly with your most important siting criteria described on page 2-56 of the Draft EIS. More specifically, the II-A corridor is the most desirable. The II-A corridor only impacts a few tax parcels owned by CPB. In contrast, the 11-F corridor significantly and detrimentally impacts many important CPB properties located in Duchesne, Carbon, Utah, Sanpete and Juab Counties.	Thank you for your comment.
Corporation of the Presiding Bishop-LDS	614-792	CPB is very concerned about the impacts of the 11-E and II-F corridors on its recreational camp properties in Southwestern Duchesne County, Northern Carbon County and Eastern Utah County. As shown on the attached Maps 1 and 2, all of the corridors under consideration in this area significantly impact CPB owned lan	Thank you for your comment.
Corporation of the Presiding Bishop-LDS	614-796	For these reasons CPB opposes all the route alternatives in the 11-F area and requests that you remove these alternatives from further consideration. CPB sees no reason to incur such a detrimental impact to its and other people's private properties in a green field area when an established transmission corridor already exists in II-A and can readily accept the TWE Project with significantly less disturbance and impacts to the pristine lands that would be affected by II-F.	Thank you for your comment.
Corporation of the Presiding Bishop-LDS	614-798	At the City of Nephi, the Applicant Proposed II-A and Agency Preferred Alternative II-F corridors again separate (see Maps 1 and 3). CPB prefers and requests that you select the Applicant Proposed II-A corridor, which traverses north of Nephi City. The Agency Preferred Alternative II-F corridor, which traverses south of the city, crosses extensive agricultural properties owned and operated by CPB. While power lines are not unusual in this area and are not completely incompatible with farming operations, we expect that these properties will have increased development pressure (and value) in coming years and, therefore, we suggest that the line be sited to the north of Nephi City. CPB wants to avoid the impacts to its farming operations brought by a major transmission line, and for that reason prefers the II -A corridor.	Thank you for your comment.
Corporation of the Presiding Bishop-LDS	614-799	CPB prefers and requests that you select the Agency Preferred Alternative III-B corridor in the Final EIS, specifically as it relates to Iron County and Washington County, Utah. We understand that the applicant has proposed the III-A route because it aligns with the designated West-Wide Energy Corridor. However, because of the unique historic and cultural values of the Mountain Meadow Site and its designation as a National Historic Landmark, we wish to discourage the construction of new overhead transmission infrastructure in the vicinity of that site.	Thank you for your comment.
Corporation of the Presiding Bishop-LDS	614-800	If the agencies change their preference in this region to alternative III-A, then we request that one of the three Alternative Variations described in the DEIS (i.e., Ox Valley East, Ox Valley West, and Pinto) be selected. If these are determined to be unviable alternatives, then we request that the line be located to the east of the existing transmission and pipeline infrastructure that lies just to the east of the Mountain Meadow Historic Site.	Thank you for your comment.
Coyote Springs Investment LLC	586-875	The proposed TransWest Express Transmission Line Alternative route III-C goes through the New Master Planned Community being developed by COYOTE SPRINGS INVESTMENT LLC in Clark and Lincoln Counties. The proposed Alternate route III-C bisects a large portion of Fee-Owned property in the Coyote Springs Community on the East Side of US 93. The Coyote Springs Community has existing development agreements with each of Clark and Lincoln Counties; Millions of Dollars of Installed Community Infrastructure, including, without limitation, a power substation, a water treatment plant, and a wastewater treatment plant; maps; and an Award Winning Golf Course (Coyote Springs Golf Club) that is open to the public year-round, these are a few reasons that Alternate route III-C through the Coyote Springs Community is an inappropriate location. TransWest Express proposed Alternate route III-C SHOULD BE RE-LOCATED, possibly to the existing public utility corridor on the West Side of US 93.	Thank you for your comment. Your opposition to Alternative III-C has been noted.

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Commenter Name	Comment ID	Extracted Comment	Response
Coyote Springs Investment LLC	586-875	The proposed TransWest Express Transmission Line Alternative route III-C goes through the New Master Planned Community being developed by COYOTE SPRINGS INVESTMENT LLC in Clark and Lincoln Counties. The proposed Alternate route III-C bisects a large portion of Fee-Owned property in the Coyote Springs Community on the East Side of US 93. The Coyote Springs Community has existing development agreements with each of Clark and Lincoln Counties; Millions of Dollars of Installed Community Infrastructure, including, without limitation, a power substation, a water treatment plant, and a wastewater treatment plant; maps; and an Award Winning Golf Course (Coyote Springs Golf Club) that is open to the public year-round, these are a few reasons that Alternate route III-C through the Coyote Springs Community is an inappropriate location. TransWest Express proposed Alternate route III-C SHOULD BE RE-LOCATED, possibly to the existing public utility corridor on the West Side of US 93.	Thank you for your comment. Your opposition to Alternative III-C has been noted.
Coyote Springs Investment LLC	586-889	In addition, the proposed TransWest Transmission Line Alternate route III-C goes through several active ranch properties owned by TUFFY RANCH PROPERTIES, LLC, in Lincoln County. Tuffy Ranch Properties, LLC prefers that TransWest's proposed Alternate route III-C SHOULD BE RE-LOCATED to a different location that does not cross any of Tuffy Ranch Properties LLC's Property.	Thank you for your comment.
Davis, Charlotte	419-615	Reservation Ridge is in Argyle Canyon, and our concern, of course, is with transmission line coming within about a thousand feet of our cabin and on our property	Thank you for your comment.
Davis, Charlotte	419-617	I would rather see it, tell you the truth, not across the habitat that is used for deer, elk, wildlife, sage hens, pine hens, when there is a corridor up north that they could be using right next to the highway that would not interfere with this type of wildlife area. The one that is being proposed is the one that comes across by Emma Park, same concerns with the Sage hen and stuff like that. What they are trying to do is trying to pushing the corridor four miles north of where a proposed line was. So there is some discussion of having that transmission line down towards the Emma Park area that I don't think would interfere as much as what this one is going to do. Now, of course, if you want to – what is it -- 80, the highway that goes through Duchesne.	Thank you for your comment.
Davis, Charlotte	419-618	If the alternate route was following U.S. 40, I do not think you'll have that type of a concern, or even higher in northern Utah. This used to be part of the Ute Reservation, Indian reservation, you know, and I'm sure they have artifacts, things like this throughout this whole area that people have not discovered or there may be some sacred ground or whatever in this particular area that they may disturb.	Thank you for your comment.
Davis, Charlotte	419-619	If we want to mitigate the impact on the environment and our concerns, my proposal would be to go with the TransWest Proposed Express preferred route. Not the BLM and forest route. If they want to mitigate the environmental concerns, that's what they need do	Thank you for your comment.
Defenders of Wildlife	559-1611	we remain concerned that the TWE transmission line will cause significant adverse impacts to greater sage-grouse if improperly routed.	Thank you for your comment. Impacts of the alternatives on greater sage-grouse are disclosed in Chapter 3 of the Draft EIS.
Defenders of Wildlife	559-1611	we remain concerned that the TWE transmission line will cause significant adverse impacts to greater sage-grouse if improperly routed.	Thank you for your comment. Impacts of the alternatives on greater sage-grouse are disclosed in Chapter 3 of the Draft EIS.
Defenders of Wildlife	559-1617	The primary means to preserve desert tortoise is to avoid disturbing high-quality, occupied habitat and to ensure that areas with healthy populations are connected by relatively wide and intact habitat linkages. Unlike other species for which individuals migrate readily between populations, desert tortoise are "corridor dwellers." Maintaining landscape connectivity is essential to provide for the slow transfer of genetic information between populations of this species. All TWE segments and alternatives in Nevada would intersect desert tortoise Critical Habitat, Desert Tortoise Recovery Office Priority 2 habitat, and areas predicted to have high habitat potential based on USGS models, as shown by Figure 2 (attached). Defenders believes that all but one of the three routes entering into Nevada from Utah have unacceptable desert tortoise impacts.	Comment noted. Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will have been considered by the BLM and documented in the administrative record associated with this EIS.
Defenders of Wildlife	559-1618	Routes 510 and the combination of routes 520, 580, and 610 would create new transmission corridors through relatively undisturbed lands, passing through desert tortoise critical habitat, desert tortoise non-critical habitat that has burned but has recovery potential, two of the three known occurrences of the Desert Valley kangaroo mouse, and potentially impacting other BLM Special Status Species (Meadow Valley speckled dace, red-tailed blazing star bee, Meadow Valley sandwort, and the Needle Mountains milkvetch). Route 502.05, in contrast, appears to represent the least impactful of the three routes.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Defenders of Wildlife	559-1624	In many states across the west, mitigation for species, including the greater sage-grouse, will need to occur on lands managed by the BLM. To help achieve effective mitigation on these lands, the BLM must specify an approach to mitigation that can be considered durable. To be durable, mitigation conducted outside the areas of impact must, at a minimum, be effective for as long as the land-use authorization affects the resources and values, which may include withdrawal or removal of other incompatible uses on those sites. The duration of actions taken to achieve durable protection must be established consistent with the biological and ecological needs of the resources impacted.	Thank you for your input. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Defenders of Wildlife	559-1624	In many states across the west, mitigation for species, including the greater sage-grouse, will need to occur on lands managed by the BLM. To help achieve effective mitigation on these lands, the BLM must specify an approach to mitigation that can be considered durable. To be durable, mitigation conducted outside the areas of impact must, at a minimum, be effective for as long as the land-use authorization affects the resources and values, which may include withdrawal or removal of other incompatible uses on those sites. The duration of actions taken to achieve durable protection must be established consistent with the biological and ecological needs of the resources impacted.	Thank you for your input. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Desert Tortoise Council	696-1840	The Council would rather see an alternative transmission alignment that entirely avoids the Beaver Dam Slope Area of Critical Environmental Concern (ACEC) than one that bisects it, as the proponent-proposed alignment would. We understand that the proposed alternative would affect an area about nine miles long and 250 feet wide within an existing utility corridor through the Beaver Dam Slope ACEC (page 3.15-76, 2nd paragraph), and that realigning the right-of-way to the west would avoid this small critical habitat unit.	Thank you for your comment.
Desert Tortoise Council	696-1845	The Council recommends that the final alignment remain within existing designated utility corridors rather than be located outside them. There are several places where the proposed alignment leaves designated corridors and we assume no transmission lines currently exist. The Council recommends a final corridor that impacts the least amount of desert tortoise habitat, avoids designated critical habitat, and is located on lands that are already degraded and therefore supporting fewer or no desert tortoises.	Thank you for your comment.
Desert Tortoise Council	696-1849	If in spite of these recommendations the preferred alternative is pursued, we expect that formal consultation with USFWS will be required and a biological opinion will be issued that will necessarily assess if the project may result in "adverse modification of critical habitat," if the project may "jeopardize the continued existence of the species," and determine what level of "take" of tortoises may be associated with the project. The TransWest line could severely compromise designated desert tortoise critical habitat, the intended focal area for recovery of the species.	Comment noted. Alternatives selection is determined by criteria across multiple resources. No change to FEIS text.
Desert Tortoise Council	696-1849	If in spite of these recommendations the preferred alternative is pursued, we expect that formal consultation with USFWS will be required and a biological opinion will be issued that will necessarily assess if the project may result in "adverse modification of critical habitat," if the project may "jeopardize the continued existence of the species," and determine what level of "take" of tortoises may be associated with the project. The TransWest line could severely compromise designated desert tortoise critical habitat, the intended focal area for recovery of the species.	Comment noted. Alternatives selection is determined by criteria across multiple resources. No change to FEIS text.
Desert Tortoise Council	696-1850	The statement on page 3.8-138 under "Alternative Variations in Region III," indicates that "No ... desert tortoise habitat would be impacted by the alternative variations in Region III." As given above, the Council would encourage the proponent to select, and the regulatory agencies to adopt, one of the alternative variations that would minimize impacts to occupied tortoise habitats and completely avoid impacts to tortoise critical habitats.	Thank you for your comment.
Desert Wetlands Conservancy	686-1200	As it stands the Draft EIS appears to propose a new corridor west of Rainbow Gardens that will create an entirely new crossing of the Las Vegas Wash. We feel that this new line, if constructed, should lie immediately adjacent to the existing corridor. It is imperative that both the public and federal decision makers have complete and detailed information so that informed decisions can be made with regard to siting and permitting.	Thank you for your comment.
Desert Wetlands Conservancy	686-1204	We are also extremely disappointed in the Balm's preferred route in Nevada that would establish an entirely new corridor through the almost pristine Clover Mountains and Tule Desert. This alternative is contrary to the BLM's Ely District's RMP nor is it consistent with the basic planning concept of using existing corridors wherever possible. We strongly oppose that portion of the proposed route in Nevada which enters the State south of Panaca and proceeds south through the Clover Mountains to rejoin the existing corridor near Toquop Wash.	Thank you for your comment.
Dickson, Priscilla Ann	207-567	I am aware that the BLM has proposed an alternate route for the project and I urge you to strongly pursue the alternative rather than the current proposed project which would desecrate the burial grounds of my ancestors in the Mountain Meadows Valley. I believe there is a strong case to move the project and I support the BLM proposal.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Elam, Ryan	234-260	Recently I also came across a joint resolution from County Commissioners in multiple states advocating the TWE proposed region I route I-A for the transmission line. I'm also in favor of this route, and am a bit disappointed that routes including I-D (which the BLM prefers) and especially the other alternatives that go west through Rio Blanco Counties	Thank you for your comment.
Energy Fuels Resources (USA) Inc.	576-754	EFR will not object to the Alternate II-B or II-C route since such a transmission line would have a minimal impact on underground mining.	Thank you for your comment.
Erekson, Affel and Nezla	421-737	I own 230 acres that is dissected by alternative 2B, and that's prime farmland, and there's a lot of residential area right there too. I mean, it's not obvious immediately, but people have been buying and building on the main road, Highway 89 there, in some of the corridors, so it's not just impacting farming, it's also impacting residential areas, so it worries me. So 2B, I'm totally against putting it in 2B for those two reasons. It's prime farmland and residential area. The corridor is two miles wide. The centerline of that corridor goes right over my front gate, which is only a couple -- I guess it's about 2000 feet from my house. And along that corridor that main street there, there's a total of -- one, two, three, four, five -- six people that live right there. So it seems to be a bad idea to be running this power line over people's houses. If they go a little farther north in the two-mile corridor until it crosses the river, San Pitch River, there's no homes, but right there where it crosses the river, there's a couple people that live there. So it turns out to be a bad idea, you know. So that corridor from the centerline north doesn't work well, and from the corridor going south -- that's one mile -- as it gets closer to Mount Pleasant, there's even more residential areas. So the alternative 2F that they've suggested being the alternative -- I mean, not alternative, the primary one, the preferred one really ends up being the best idea from what I can see.	Thanks you for your comment. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Erekson, Affel and Nezla	421-739	I hike quite a bit every weekend up in that canyon area, and one of the reasons for the quality of the life here is the vistas we can see, the red cliffs in the canyon and then up into Mount Nebo. My biggest concern is what does it do to the view, the panorama of the area, these more power lines obstruct the view. Our community hiking area is very close to Mountain Nebo wilderness area. Not far off of that, the Scenic Highway Byway going up Mount Nebo, the backside through Payson, great draw for our community. As more power lines come down the canyon my concern is we're trading off some of our natural beauty assets for a mass of wires obstructing the view.	Thank you for your comment.
Erekson, Affel and Nezla	421-741	Turns out there's a preferred route that would avoid all that. Did you know they are talking about two separate groups of power lines, one 600k and one 500k that run parallel? So it's not just one set of towers. It's actually two. And now we doubly don't want it.	Thank you for your comment.
Erekson, Affel and Nezla	421-742	It's ugly, unsafe, unhealthy, and they shouldn't ruin your property where you paid lots of money to come out of the city and come out of country and they do that to it, and it's like you're up in West Valley or somewhere. I don't understand why they can't go clear across the top of Utah, go down past Dugway. Why don't they go clear back around the other side of the lake? I don't understand why they came down through inhabited areas rather than -- well, I know why. It's closer. It's cheaper for them but bad for us. If you come straight across from Rawlins, Wyoming -- that's ugly nothing desert -- and went straight down on the west of Great Salt Lake down through Dugway all the way down to Vegas, there's nothing in that. Nobody lives there.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Erekson, Affel and Nezla	421-742	It's ugly, unsafe, unhealthy, and they shouldn't ruin your property where you paid lots of money to come out of the city and come out of country and they do that to it, and it's like you're up in West Valley or somewhere. I don't understand why they can't go clear across the top of Utah, go down past Dugway. Why don't they go clear back around the other side of the lake? I don't understand why they came down through inhabited areas rather than -- well, I know why. It's closer. It's cheaper for them but bad for us. If you come straight across from Rawlins, Wyoming -- that's ugly nothing desert -- and went straight down on the west of Great Salt Lake down through Dugway all the way down to Vegas, there's nothing in that. Nobody lives there.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Erekson, Affel and Nezla	421-743	Because of the amount of BLM land, Indian reservations, national forest, and government land, the amount of available land in Utah for farming and for residential areas is restricted in the first place, so they don't need to mess it up even more with power lines. They should run it over some of the government land that they won't let us build on anyway. Down over the bombing range, let them drop bombs on the power lines; right? Yeah, it's crazy.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Friends of Northwest Colorado	567-1637	We support using existing corridors when and wherever possible. BLM should thoroughly analyze the opportunity to avoid impacts to sensitive, undeveloped areas by routing along existing highways and co-location with existing transmission lines.	Thank you for expressing your concerns. Please note that the development of alternatives has considered options for maximizing the co-location of the proposed line along existing highways and transmission lines (See Chapter 2 of the Draft EIS).
Friends of Northwest Colorado	567-1637	We support using existing corridors when and wherever possible. BLM should thoroughly analyze the opportunity to avoid impacts to sensitive, undeveloped areas by routing along existing highways and co-location with existing transmission lines.	Thank you for expressing your concerns. Please note that the development of alternatives has considered options for maximizing the colocation of the proposed line along existing highways and transmission lines (See Chapter 2 of the Draft EIS).
Friends of Northwest Colorado	567-1638	Based on current knowledge, the route with the least environmental impacts in Western Colorado travels along US Highway 13 to Craig and then West along the southern part of US Highway 40. However, we would like to be clear that while this may be the least impactful, even this route risks serious harm to sensitive species and landscapes. Crossing any part of Western Colorado means the project endangers sensitive species and/or encroaches upon lands that we are striving to conserve as they are for future generations to enjoy.	Thank you for your comment.
Friends of Northwest Colorado	567-1639	All routes crossing into northwest Colorado would likely negatively impact sensitive species specifically, Greater Sage Grouse, Columbia Sharp tailed Grouse, White Tailed Prairie Dog, Black Footed Ferret, many rare and sensitive plant species and potentially indirect impacts on several fish species. Until science establishes no negative species effects from transmission lines, the first policy should be to take a precautionary approach and avoid all areas with sensitive species.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Friends of Northwest Colorado	567-1639	All routes crossing into northwest Colorado would likely negatively impact sensitive species specifically, Greater Sage Grouse, Columbia Sharp tailed Grouse, White Tailed Prairie Dog, Black Footed Ferret, many rare and sensitive plant species and potentially indirect impacts on several fish species. Until science establishes no negative species effects from transmission lines, the first policy should be to take a precautionary approach and avoid all areas with sensitive species.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Friends of Northwest Colorado	567-1640	Increased disturbance from the construction and ongoing maintenance may result in direct impacts to sage-grouse including increased mortality from collisions, and disturbance and displacement. Greater sage-grouse are very sensitive to human disturbance and noise associated with development. Disturbance near leks during the breeding season can have significant negative impacts. In addition, roads and traffic result in indirect and cumulative impacts to sage-grouse by facilitating the spread of invasive species, influencing predator movements, and increasing wildfire potential from human activities.	Thank you for expressing your concerns. Potential project-related impacts to greater sage-grouse were analyzed in detail in Section 3.8.6 of the Draft EIS and this analysis has been further refined and augmented in the Final EIS.
Friends of Northwest Colorado	567-1640	Increased disturbance from the construction and ongoing maintenance may result in direct impacts to sage-grouse including increased mortality from collisions, and disturbance and displacement. Greater sage-grouse are very sensitive to human disturbance and noise associated with development. Disturbance near leks during the breeding season can have significant negative impacts. In addition, roads and traffic result in indirect and cumulative impacts to sage-grouse by facilitating the spread of invasive species, influencing predator movements, and increasing wildfire potential from human activities.	Thank you for expressing your concerns. Potential project-related impacts to greater sage-grouse were analyzed in detail in Section 3.8.6 of the Draft EIS and this analysis has been further refined and augmented in the Final EIS.
Friends of Northwest Colorado	567-1643	Because of unacceptable impacts to Greater Sage Grouse, Black Footed Ferret, sensitive plant species and direct or visual encroachment on wilderness study areas and/or citizens proposed wilderness, BLM should not select any routes crossing west of established US Highway 13 corridors. We ask BLM to avoid all routes that impact sensitive plant and animal species.	Thank you for your comment.
Goldberg, Susan	173-237	I don't see the point in running the lines through Garfield City when you can have a shorter distance keeping the routes where they are in Moffat County. Also, we have reading the papers and heard that this is the route that the Moffat County Commission has approved in Colorado and they signed a powerful resolution for that route with other Wyoming counties.	Thank you for your comment.
Governor of Wyoming	590-850	The decision on final routing of this project is important-it will chart the course for future transmission lines out of southern Wyoming. For this reason, I prefer Alternative I-A, with modifications discussed below. Alternative I-A results in the least environmental impact and best meets the needs of Carbon and Sweetwater County residents, particularly those who live in the town of Baggs and the Little Snake River Valley. It is also supported by Carbon and Sweetwater Counties. Alternative I-A is 17 miles shorter than the BLM's preferred route and reduces impacts on historic sites and Greater Sage-grouse. This shorter alternative requires fewer constructed or upgraded access miles of road. It places the transmission line away from Carbon County communities, Adobe Town and other important recreational areas in Sweetwater County. Alternative I-A crosses a contributing section of the Cherokee Trail. Cherokee Trail is eligible to be listed on the National Register of Historic Places.	Thank you for your comment.
Great Salt Lake Audubon	582-871	GSLA believes all project transmission towers, to the greatest extent possible, should be unguyed to reduce bird collisions.	The Final EIS includes consideration of the use of unguyed towers as necessary to reduce impacts from bird collisions. Additionally, guy wires will be marked with high-visibility markers to reduce bird collisions (See Sections 3.7 and 3.8 of the Draft EIS).

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Great Salt Lake Audubon	582-871	GSLA believes all project transmission towers, to the greatest extent possible, should be unguyed to reduce bird collisions.	The Final EIS includes consideration of the use of unguyed towers as necessary to reduce impacts from bird collisions. Additionally, guy wires will be marked with high-visibility markers to reduce bird collisions (See Sections 3.7 and 3.8 of the Draft EIS).
Greenberg, Paul	172-233	I also thank you for choosing the right route in Region IV, the Alternative IV-A route, and keeping the transmission line where it should be here in Nevada, on public land as much as possible. Good job.	Thank you for your comment.
Greenberg, Paul	172-234	In addition, since the Sunrise Instant Study Area completely lacks wilderness character, as you wrote on page 3.15-88 and as everyone knows, it isn't problem to put this transmission line next to the other ones already there on public land. It just makes sense. And, putting the transmission line next to others in the Sunrise area ensures you are following your Number 1 siting criteria on page 2-56, to use existing designated utility corridors.	Thank you for your comment.
Grover, Frank	646-927	In Figure ES-1 Project location, I prefer the agency location, a southern loop over the applicant preferred because it has less influence on private lands near the Duchesne River. A R-0-W across private property is the kiss-of-death to any future development on the private land. The land will not be selected for subdivision or other alternate use. The applicant preferred route becomes an intrusion on the view-shed to travelers on the road from Strawberry Reservoir to near Vernal.	Thank you for your comment.
Grover, Frank	646-928	At Jensen, Utah, I would prefer a crossing of the Green River close to the bridge rather than another location. This would reduce and consolidate the visual intrusion to river users who prefer solitude and not evidences of man's activities.	Thank you for your comment.
Hafen, Brent	430-641	We feel like the power line going through Washington County has already been impacted. So, to go into a green area or an undeveloped area and put a power line in doesn't make sense if we can put it on the same line that the impact has already been done, has already been made.	Thank you for your comment.
Hafen, Brent	430-643	But I think the biggest thing is really the impact that it has on its environment. And even though that may, going through the Mountain Meadows may have to be done with helicopters because it's a roadless area, may have a little bit of impact on expense. It's already been impacted. It's there. There are lines there. You have already got transmission lines, gas lines everything going through there. It was a corridor that was established to do that particular kind of thing.	Thank you for your comment.
Hafen, Brent	430-644	To establish another whole new line simply because we are afraid of a group who think it's going to impact them more is, to me, not a good decision. We are impacting the environment a lot more by going through a whole new area than we are by going through an established corridor.	Thank you for your comment.
HawkWatch International	570-1196	With respect to the applicant proposed and agency preferred routes, we support agency alternatives in Region I and II that reduce impacts to greater sage-grouse habitat and other wildlife (Alternative I-D and Alternative II-B, respectively.) We also support the agency preferred route for region III, as it bypasses some known raptor nesting areas as well as some potential raptor habitat through the Southwestern part of Utah near ridgelines and mountains.	Thank you for your comment.
Hiatt, John	431-646	It will have devastating impacts really on the Clover Mountains because it will open up a huge area which is almost de facto wilderness, there's not very much activity really there at all, and a lot of that is covered by pinion juniper forest, and building a power line through that will increase the likelihood of catastrophic failure to that power line when there's a fire there, because there will be fires. It's not a question of if, it's only a matter of when.	Thanks for your comment.
Hiatt, John	431-647	And so I strenuously object to the alternative which goes through from basically Panaca Summit south to intersect with the existing corridor north of Mesquite.	Thank you for your comment.
Hillewaert, Shawn	384-587	I believe, however, you must amend the Agency Preferred Alternative route from alternative I-D to alternative I-A. The analysis shows that Alternative I-A requires fewer miles and fewer acres of surface disturbance. Alternative I-A has fewer impacts on the habitat of sage grouse and other wildlife. Most important to me and others who frequently travel this area, Alternative I-A is the least visible from our public and well-traveled highways as is clearly demonstrated in the analysis.	Thank you for your comment.
Howk, Todd	587-917	I've seen reports that estimate this TransWest transmission project with Wyoming wind energy will save Californians about \$600 million every single year in renewable energy costs, but I couldn't find that mentioned anywhere in the Draft EIS, and I think that is a very important positive impact on the human environment that should be noted in the Final EIS and noted right up front.	Thank you for your interest in this project and EIS. The potential benefits of the project to future consumers of energy conveyed by the project is beyond the scope of the NEPA assessment. No changes in the text or analysis resulted from this comment.
Howk, Todd	587-917	I've seen reports that estimate this TransWest transmission project with Wyoming wind energy will save Californians about \$600 million every single year in renewable energy costs, but I couldn't find that mentioned anywhere in the Draft EIS, and I think that is a very important positive impact on the human environment that should be noted in the Final EIS and noted right up front.	Thank you for your interest in this project and EIS. The potential benefits of the project to future consumers of energy conveyed by the project is beyond the scope of the NEPA assessment. No changes in the text or analysis resulted from this comment.
IBEW - Eighth District	126-103	In Colorado, the Final EIS should select Alternative I-A in Region I, along with Micro Siting Option 1, to have the least environmental impacts, the least conflicts with local government preferences as expressed in joint resolutions, and to best implement your siting criteria.	Thank you for your comment.

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IBEW - Eighth District	126-105	In Utah, the Final EIS should select Alternative II-A in Region II, to have the least environmental impacts and to best implement your siting criteria. According to the Draft EIS page 3.14-71, Alternative II-A "has the greatest amount of co-located mileage" and would have the "fewest impacts acreage-wise." Pushing the TWE Project away from existing transmission lines in Utah increases the project's environmental footprint and the risk for project delays due to using new corridors that require more line miles and cross more undisturbed lands.	Thank you for your comment.
IBEW - Local Union #322	204-563	As the Representative of 530 electrical workers in the State of Wyoming, I am very concerned with your choice of an alternative route for the TransWest Express Project. I disagree with your BLM Agency Preferred Alternative Route 1-D in Colorado and Wyoming, and I request that you choose Alternative 1-A for the route instead.	Thank you for your comment.
IBEW - Local Union 57	573-945	On that point, in Region II of Utah, we firmly reject your agency preferred route of Alternative II-F and request that you choose the environmentally preferable route, Alternative II-A, in the Final EIS and Record of Decision. As linemen, we know that transmission lines typically have the least environmental impact when they are sited in parallel with other linear features and other transmission lines. The Draft EIS fails to prove the wisdom of selecting the II-F route, which not only does not use the designated West-Wide Energy Corridor connectivity but also creates more green field impacts, impacts a wild and scenic river, impacts more cultural and wildlife resources, and crosses the land of a sovereign nation that may or may not welcome this project - and all this when there is definitely space next to the Bonanza 345 kV line to safely and reliably build the TWE Project.	Thank you for your comment.
IBEW - Ninth District	137-211	we ask that you approve a route that is as direct and as short as possible given environmental constraints. At an approximate construction cost of \$2 million per mile, every mile that you unnecessarily add to the TWE Project has a negative economic consequence for our members and other ratepayers who will be buying this renewable power for years to come.	Thank you for your comment.
Jensen, Morgan	125-100	At least in Region I, the number of communities potentially affected is DRASTICALLY reduced by choosing Alternative A.	Thank you for your comment.
Jensen, Morgan	125-101	Please, for the sake of our way of life and human health, go with Alternative A in Region I and do not, I beseech you, do not choose the two easterly routes.	Thank you for your comment.
Jensen, Morgan	125-97	I am writing you today because I wanted to protest the proposed transmission route that goes directly near Baggs. I also want to protest the other route that jogs back toward Baggs.	Thank you for your comment.
Kudera, Ryan	129-109	Under Alternative I-A, historic trail and road crossings would be less than Alternatives I-C and I-D. Overall visibility of the transmission line from the historic trails, road, and highway would be 92 miles under Alternative I-A, which would be less than under Alternatives I-C and I-D.	Thank you for your comment.
Lake Las Vegas Master Association	647-932	We hereby object to the construction of the line in its proposed location and suggest that at a minimum, the line be relocated as suggested by the City of Henderson through Alternative IV-B, passing through the northwest corner of the Lake Mead National Recreation Area between Lake Las Vegas and Lake Mead.	Thank you for your comment.
Lancaster, Debra L.	240-270	correct route for this project is: Alternative I-A listed in the Draft Environmental Impact Statement.	Thank you for your comment.
Lincoln County Nevada Comm/N-4 Grazing Bd	449-516	We thank the Cheyenne, Wyoming BLM office and David Fetter with AECOM Environment with supplying the GIS shape files that allowed Resource Concepts, the county's mitigation planning consultant of Carson City, Nevada to create the two maps I shared with you last night on the record. Those maps show the agency preferred route that has at least 50 miles to this point that have been undisturbed as far as energy projects are concerned. 24 miles are outside of the already-approved-on-paper corridor for Lincoln County Water District. We would recommend that you take a serious look at the agency -- the proponent preferred alternative that more closely follows the I-15 corridor. And it uses only a small portion of the route in Lincoln County in the southeast corner because it's going to be more difficult, more timely, more expensive and across some wildlife winter range that shouldn't be disturbed in this manner.	Thank you for your comment.

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Lincoln County Nevada Comm/N-4 Grazing Bd	450-524	The N-4 Grazing Board took a position two years ago during your scoping meetings supporting the proponent preferred route, the red route, on the map that I turned in to you Wednesday, in the existing energy corridor. We continue this strong support. We understand there have been concerns raised about avoiding the Mountain Meadows area along Utah Highway 18. Please understand that wherever you move this line in your final decision, it will still impact ranchers, maybe just a different set of people, but the impacts will remain wherever you go. These impacts should be detailed to comply with NEPA. This agency preferred route suggests moving through rugged, untouched terrain, partially outside approved utility corridors. For this reason, we can not support the agency preferred alternative. It makes no sense, time, money, effort, geography, geology, to build the line on the agency preferred alternative or on the third alternative that's the longer distance, the 97-mile line. We much prefer the short line that crosses the southeast corner of Lincoln County because it only affects one rancher. And we can do mitigations that will help keep him in operation.	Thank you for your comment.
Lincoln County Nevada Commissioner	139-118	I prefer Alternative III-B in Lincoln County Nevada. It would increase our tax base and help the economy.	Thank you for your comment.
Lincoln County Nevada Commissioners	691-1867	The County supports efforts in decreasing resource impacts in terms of preferred routes. In terms of routes, Alternative III-B, (Agency Preferred) is supported by the County. Alternative III-C is not supported by the County.	Thank you for your comment.
Lincoln County Nevada Commissioners	691-1869	The County will be directly involved during the planning and construction phase as those details will be addressed specifically within the Special Use Permitting process. The Agency Preferred route will impact the County's resources more significantly than the Applicant Proposed route.	Thank you for your comment.
Lincoln County Nevada Commissioners	691-1874	The Alternative III-C route, which is not supported by the County, contains 92 private landowners within its alignment. The Agency Preferred route (III-B) contains 23 private landowners within its alignment. The Applicant Proposed route (III-A) contains no private landowners within its alignment.	Thank you for your comment. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Lincoln County Nevada Commissioners	691-1874	The Alternative III-C route, which is not supported by the County, contains 92 private landowners within its alignment. The Agency Preferred route (III-B) contains 23 private landowners within its alignment. The Applicant Proposed route (III-A) contains no private landowners within its alignment.	Thank you for your comment. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Lincoln County Water District	649-935	The District supports efforts in decreasing resource impacts in terms of preferred routes. In terms of routes, Alternative III-B (Agency Preferred) is supported by the District. Alternative III-A and III-C are not supported by the District.	Thank you for your comment.
Ludwig, Evan	437-655	After reviewing the visual panels and talking to various people, BLM and construction advocates of this high line, I feel it would not be advantageous to Utah to allow the line to be built. We do not need 21,000 plus high lines making a footprint on the state's real estate, be it federal, state or private land. There is virtually no benefit to the state of Utah as far as long-term benefits as far as power potential for enhancing Utah Power base. All the benefits will go to California, Arizona, and possibly Las Vegas area. All we get is the short-term construction benefits and maybe a pittance of small tax remuneration. We do get 21,000 potentially rusty eye sores also.	Thank you for your comment.
Martinez, T. L.	130-110	I believe that the BLM's Agency Preferred Alternative route because of the visual impacts from Highway 789. After reading the Rawlins Daily Times July 17 article, there is a significant amount of visual impacts from BLM's preferred I-D north-south route that on the map was "gold". In comparison, the "red" route, which is I-A, won't be seen. I don't understand how the gold route with 24 miles of visibility is comparable to the red I-D route.	Thank you for your comment.
Martinez, T. L.	130-111	The other area of concern the alternative connector in Region I. This route is even closer to Baggs. While there wasn't any visual simulation provided from the connector one can infer that if the BLM and Western end up choosing that Baggs alternative connector in the final EIS, there will be an even stronger negative visual impact on Baggs and on the entry to Highway 70.	Alternative connectors in Region 1 have been removed from consideration in the Final EIS.
Martinez, T. L.	130-111	The other area of concern the alternative connector in Region I. This route is even closer to Baggs. While there wasn't any visual simulation provided from the connector one can infer that if the BLM and Western end up choosing that Baggs alternative connector in the final EIS, there will be an even stronger negative visual impact on Baggs and on the entry to Highway 70.	Alternative connectors in Region 1 have been removed from consideration in the Final EIS.

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Miller, Jamie	136-116	I would like to express my concern for the Bureau of Land Management's Agency Preferred Alternative for Region I (Alternative I-D). This is in direct conflict with the route proposed by the cooperating agencies of Carbon, Sweetwater and Moffat counties. The counties have been actively engaged in the process and have made it abundantly clear that they want the route as proposed by TransWest Express. Other concerns with Alternative I-D is increased mileage, increased disturbances and problems with sage grouse. Not only are there more environmental disturbances from Alternative I-D in comparison to Alternative I-A, there are severe implications to human health and the way of life in the communities of Carbon and Moffat counties. Please revise the Agency Preferred Alternative for Region I to Alternative I-A.	Thank you for your comment.
Moe, Frank	563-1244	I support Alternative route 1-A. The commissioner's of the effected counties ,who represent their constitutions, have chosen this alternative because it is the best for each county.	Thank you for your comment.
Moffat County Colorado Nat Resources Dept	163-423	Moffat County Supports Applicant Proposed Route (Alternative A): Moffat County is generally supportive of the applicant proposed route in Alternative A, though Moffat County assumes the applicant can work out access through State of Colorado lands and private parcels along the proposed route.	Thank you for your comment.
Morrison, David	612-922	Finally, I see that on page 2-57 of the Draft EIS, you wrote that more miles equate to more expense. Therefore I support the Applicant Proposed route for the transmission line because it is the shortest path between Wyoming and California, and it means that the cost of renewable wind electricity reaching California will be kept as low as possible.	Thank you for your comment.
Myrin Ranch Inc, & Myrin Livestock Co LLC	595-803	Myrin Ranch Inc. and Myrin Livestock Co LLC own real property generally west of Roosevelt, Utah situated under the Applicant Proposed II-A route in sections 28, 29, 32 and 33, T2S, R3W, USM. Our family, business, property and community will suffer significant adverse impacts if the proposed transmission line follows the applicant proposed route. The Agency Preferred II-F route is preferable as it impacts less private land, less agricultural land, and less populated areas.	Thank you for your comment.
N-4 State Grazing Board	693-1854	The Board supplied comments previously as part of the project scoping phase. At that time, the Board supported the Applicant's Proposed A I ignment through the extreme southeast corner of Lincoln County. The Board would like to reiterate its support for the Applicant's Proposed Alignment, identified by project mapping as "Applicant Proposed 111-A". Not only does this alignment minimize impacts to public land ranchers in Lincoln County, it is 100 percent within utility corridors designated by the Ely District Resource Management Plan (Ely RMP).	Thank you for your comment.
N-4 State Grazing Board	693-1855	The other two proposed alternatives, the Agency Preferred III-B and the Alterative III-C, impact more grazing allotments including critical forage, range improvements, wildlife habitat, deeded property und certificated water rights. Neither one is located fully within utility corridors designated by the Ely RMP as only a portion of each alignment is. The designed utility corridors were selected through the RMP public planning process in an ciTort to minimize impacts to a wide suite of natural resource and land use values; therefore, both of these two proposed alignments would result in significantly more resource and land usc impacts than the applicant proposed alignment.	Thank you for your comment.
National Park Service	613-767	Section 2.5.1.3The NPS supports the use of alternatives that will avoid impacts to the Mountain Meadows Massacre National Historic Landmark (NHL). The applicant-proposed route (Alternative 111-A) would have impacts detracting from the visitor experience at the Mountain Meadows Massacre NHL.	Thank you for your comment.
National Parks Conservation Association	575-1727	The National Park Service Organic Act requires the highest level of protection for areas and sites that have been congressionally legislated or designated through presidential authority. As such, alternatives outlined in the DEIS – specifically micro-siting options 2 and 3 – should be considered contrary to the intent of establishing Dinosaur NM.	Thank you for your comment.
National Parks Conservation Association	575-1728	Based on the information outlined in the DEIS, NPCA has identified the routing through the Tuttle Conservation Easement, identified as Tuttle Easement micro- siting option 1, as having the least conflict. This route parallels the originally proposed route southeast of Highway 40, avoids transmission siting in nearby Dinosaur NM, where DOI has a responsibility to protect and preserve a unit of the National Park Service for future generations.	Thank you for your comment.
National Parks Conservation Association	575-1730	in addition to crossing National Park System land and fragmenting wildlife habitat, moving the ROW northwest for options 2 and 3 places the transmission line significantly closer to lands with wilderness characteristics and citizen proposed wilderness.	Thank you for your comment. Any associated impacts to resources in this area have been disclosed in the EIS for consideration by the decision-makers.
National Parks Conservation Association	575-1730	in addition to crossing National Park System land and fragmenting wildlife habitat, moving the ROW northwest for options 2 and 3 places the transmission line significantly closer to lands with wilderness characteristics and citizen proposed wilderness.	Thank you for your comment. Any associated impacts to resources in this area have been disclosed in the EIS for consideration by the decision-makers.

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National Parks Conservation Association	575-1731	We recognize and appreciate the political and public perception challenges Colorado Parks and Wildlife faces if they allow the new Tuttle Conservation easement to be breached by high voltage transmission lines, as outlined in their letter of April 2013. We do not believe, however, that pushing the 250-foot ROW in Dinosaur NM, is a viable solution to a complication created when the conservation easement was established in August 2012.	Thank you for your comment.
National Parks Conservation Association	575-1732	NPCA opposes Tuttle Easement Option 2, which is proposed as an alternative to crossing the Tuttle Conservation Easement. While this proposal seeks to skirt between Dinosaur NM and the Tuttle Conservation Easement, the 250-foot ROW would breach both and the visual intrusion to visitors would be more significant with sky-lined towers on either side of Hwy. 40 at the Deerlodge Road junction.	Thank you for your comment.
National Parks Conservation Association	575-1733	NPCA opposes Tuttle Easement Option 3, which is proposed as an alternative to crossing the Tuttle Conservation Easement. This option crosses congressionally designated Dinosaur NM land and prevents the NPS from fulfilling the specific purpose for which the Deerlodge Road corridor was established and was clearly stated in its General Management Plan – to protect visual quality for future generations.	Thank you for your comment.
National Parks Conservation Association	575-1735	Based on the information outlined in the DEIS, NPCA has reviewed the Applicant Proposed and Agency Preferred routing through the Sunrise Mountain Instant Study Area (ISA), identified as Alternative IV-A, which avoids transmission siting in nearby Lake Mead National Recreation Area, a unit of the National Park System. We find this proposed route to be acceptable.	Thank you for your comment.
National Parks Conservation Association	575-1736	NPCA opposes Alternative IV-B, which is proposed as an Alternative to crossing the Sunrise Mountain ISA, an area determined to be without wilderness characteristics.	Thank you for your comment.
National Parks Conservation Association	575-1737	Alt IV-B. Also opposed in the corridor's interference with the River Mountains Loop Trail, a collaborative non-motorized trail system developed by public agencies including the NPS, BLM, Boulder City and Henderson with private landowners and citizens. The first-ever trail of its kind in Nevada, this trail was added in 2010 to the National Trails System by then Department of Interior Secretary Ken Salazar.	Thank you for your comment.
National Parks Conservation Association	575-1738	Additionally NPCA opposes Alternative IV-C, also proposed to avoid crossing the Sunrise Mountain ISA, which breaches the boundaries of the national park unit.	Thank you for your comment.
National Parks Conservation Association	575-1739	Also, Alternative IV-C's impact on the River Mountains Loop Trail is opposed by NPCA (although noted to be better than Alternative IV-B):	Thank you for your comment.
National Parks Conservation Association	575-1739	Also, Alternative IV-C's impact on the River Mountains Loop Trail is opposed by NPCA (although noted to be better than Alternative IV-B):	Thank you for your comment.
National Wildlife Federation	572-1882	NWF and CWF do not support the current alignment of Tuttle Easement Micro-siting Option 1. Instead, we urge the agencies to avoid lands in Colorado comprising the Tuttle Conservation Easement recently acquired by Colorado Parks and Wildlife (CPW). As noted in CPW's letter to the Bureau of Land Management (BLM), by routing the proposed transmission line in the approved corridor that is immediately north of Highway 40, the agencies can avoid permitting a project that could void the easement and damage the future credibility of CPW's conservation easement program.	Thank you for your comment.
National Wildlife Federation	572-1883	We understand that Tuttle Easement Micro-siting Option 32 would entail crossing the Deer Lodge Park access road into Dinosaur National Monument. However, this overhead incursion would occur 12 miles from the body of the Monument and would not impact other National Park Service (NPS) resources. This is not ideal. We would not support a route that crossed other NPS lands and resources. However, we believe that co-locating both roads and transmission to the greatest extent possible will result in lesser impacts to wildlife and their habitats.	Thank you for your comment.
National Wildlife Federation	572-1884	Under Option 2, the agencies could avoid both the easement and the NPS access road. Either Option 2 or 3 would preserve both the Tuttle Conservation Easement and the ability of CPW and others to enter into such agreements in the future.	Thank you for your comment.
National Wildlife Federation	572-1886	CPW notes that habitat south of Highway 40 is greater in value for Greater sage-grouse than north of Highway 40 because it is protected from development in perpetuity. A black ferret release had been planned on this site and is written into the conservation easement. Although plague has swept through the area, CPW believes that after the white-tailed prairie dog colonies re-establish, the location will serve as a good place for a future black footed ferret release.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.

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National Wildlife Federation	572-1886	CPW notes that habitat south of Highway 40 is greater in value for Greater sage-grouse than north of Highway 40 because it is protected from development in perpetuity. A black ferret release had been planned on this site and is written into the conservation easement. Although plague has swept through the area, CPW believes that after the white-tailed prairie dog colonies re-establish, the location will serve as a good place for a future black footed ferret release.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Nevada Department of Wildlife	725-1918	The Applicant Proposed Alternative(III-A) would appear to be the shortest length for energy transmission for Region III, and possibly infers the least potential in contributing additional disturbances to multiple wildlife habitats and resources compared to the Agency Preferred alternatives. It also seems superficially to involve the least engineering challenges regarding topographic features.	Thank you for your comment.
Newby, Ken	438-658	I guess this is for concerns on my allotment. It depends on which route goes through, but, for example, say, the green one, because, apparently, this, you know, it's more likely to be this one, maybe, but if it is the green one, then it impacts three of my allotments, the Sheep Flat, Northern Spring and Summit Spring. And Summit's a small allotment. It's about a 60 head permit. And then Gordon Springs is about a 300 permit. And Sheep Flat's about a 300 permit. And my concern is if this goes in in this area, does it cut my permits at all? Numbers? Because this roadway is going to take up considerable amount of area. Maintenance of whatever, and security for all of this could be a little bit of a problem. But, you know, I'm all for progress. And it's probably a good thing. But I've got to say that if it's going to put me out of my ranching business, I'm really not for it.	Thanks for your comment on the routing options. These comments were included in the discussions on the routing decisions. The agency preferred alternative for the final EIS does cross into eastern Nevada. Impacts from the proposed project on livestock grazing permits are anticipated to be minimal.
Newby, Ken	438-658	I guess this is for concerns on my allotment. It depends on which route goes through, but, for example, say, the green one, because, apparently, this, you know, it's more likely to be this one, maybe, but if it is the green one, then it impacts three of my allotments, the Sheep Flat, Northern Spring and Summit Spring. And Summit's a small allotment. It's about a 60 head permit. And then Gordon Springs is about a 300 permit. And Sheep Flat's about a 300 permit. And my concern is if this goes in in this area, does it cut my permits at all? Numbers? Because this roadway is going to take up considerable amount of area. Maintenance of whatever, and security for all of this could be a little bit of a problem. But, you know, I'm all for progress. And it's probably a good thing. But I've got to say that if it's going to put me out of my ranching business, I'm really not for it.	Thanks for your comment on the routing options. These comments were included in the discussions on the routing decisions. The agency preferred alternative for the final EIS does cross into eastern Nevada. Impacts from the proposed project on livestock grazing permits are anticipated to be minimal.
Ockey, Kevin	216-568	Of course we would prefer that the line not come at all! But if so, you place the lines on Forest Service property on either side. We also would suggest the line crossing of highway 132 to from the north to the south be done several miles east of what you are currently showing, closer to the Juab-Sanpete County line. This would allow you to run parallel the existing lines already in place without having to cross 132 on our property thus deteriorating our property values even more. This is just a brief concern and comment and we have many more. We currently have three major transmission lines running through our property. Now you folks and two other companies want to run main transmission lines through us. Its about time you considered moving to our neighbors the National Forest.	Thank you for your comment.
Oregon California Trails Association	441-662	I consider Alternative D the most likely choice for the transmission line. It will impact the Cherokee Trail and mitigation should occur due to these impacts. Alternative D will deal with the least impacts and concerns for the Cherokee Trail. Viewshed analysis, trail classification and surface impact within the NSO are concerns that need to be addressed.	Thank you for your comment.
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PacifiCorp	162-157	Rocky Mountain Power is satisfied in Beaver, Iron and Washington counties to see that the Bureau of Land Management's (BLM) agency preferred alternative for the TWE project avoids the highly concentrated area of transmission lines specifically through the Dixie National Forest, where PacifiCorp's Sigurd-to-Red Butte 345 kV line is currently being constructed.	Thank you for your comment.
PacifiCorp	162-165	Rocky Mountain Power is of the opinion that there is sufficient room within the two mile wide agency preferred corridor for all three projects to be sited, however, the TWE DEIS analysis of these cumulative impacts is inadequate and jeopardizes all three projects based upon the current NEPA approach. This inadequacy must be addressed in a supplement to the TWE DEIS and made available to the public for review and comment before proceeding to a FEIS (Section 5.3 National Environmental Policy Act Handbook, H-1790-1).	Thank you for your comment.

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PacifiCorp	162-182	RMP opposes the use of anti-perch devices due to concerns with cost, effectiveness, science-based documentation, maintenance issues and, based on design, potential safety concerns.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. Agency biologists requested that the use of perch discouragers to reduce raptor and raven depredation of sensitive species including desert tortoise, Utah prairie dog, greater sage-grouse, pygmy rabbit, and black-footed ferret be included as additional proposed mitigation in the Final EIS. EIS text and the effectiveness statements for additional mitigation measures have been updated to include statements regarding the variable or uncertain benefit of using perch discouragers based on information contained in APLIC (2006) and Lammers and Collopy (2007).
PacifiCorp	162-182	RMP opposes the use of anti-perch devices due to concerns with cost, effectiveness, science-based documentation, maintenance issues and, based on design, potential safety concerns.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. Agency biologists requested that the use of perch discouragers to reduce raptor and raven depredation of sensitive species including desert tortoise, Utah prairie dog, greater sage-grouse, pygmy rabbit, and black-footed ferret be included as additional proposed mitigation in the Final EIS. EIS text and the effectiveness statements for additional mitigation measures have been updated to include statements regarding the variable or uncertain benefit of using perch discouragers based on information contained in APLIC (2006) and Lammers and Collopy (2007).
PacifiCorp	162-183	RMP opposes the use of anti-perch devices due to concerns with cost, effectiveness, science-based documentation, maintenance issues and, based on design, potential safety concerns. RMP concurs in the use of non-specular conductors to mitigate visual impacts, however, RMP does not support the use of non-specular shield/ground wires.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
PacifiCorp	162-183	RMP opposes the use of anti-perch devices due to concerns with cost, effectiveness, science-based documentation, maintenance issues and, based on design, potential safety concerns. RMP concurs in the use of non-specular conductors to mitigate visual impacts, however, RMP does not support the use of non-specular shield/ground wires.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
PacifiCorp	162-202	Appendix D, Chapter 3, Sec. 3.7, Table 9, Mitigation Measures(Appendix C, Table C2-1, TWE-44)The BLM introduces mitigation measures with requirements for targeted preconstruction special-status species surveys for species such as the mountain plover, pygmy rabbit, Wyoming pocket gopher, desert tortoise, greater sage-grouse, southwestern willow flycatcher, yellow-billed cuckoo, Utah prairie dog, and black-footed ferret. One species-specific survey that could get particularly costly and time consuming is the Wyoming pocket gopher (SWSS-3); the DEIS states that the TWE route would avoid all active pocket gopher mounds by 75 m, unless live-trapping is conducted, to determine the gopher species using the mounds. When the species is determined, Wyoming pocket gopher mounds would be avoided, but northern pocket gopher mounds could be destroyed.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
PacifiCorp	162-202	Appendix D, Chapter 3, Sec. 3.7, Table 9, Mitigation Measures(Appendix C, Table C2-1, TWE-44)The BLM introduces mitigation measures with requirements for targeted preconstruction special-status species surveys for species such as the mountain plover, pygmy rabbit, Wyoming pocket gopher, desert tortoise, greater sage-grouse, southwestern willow flycatcher, yellow-billed cuckoo, Utah prairie dog, and black-footed ferret. One species-specific survey that could get particularly costly and time consuming is the Wyoming pocket gopher (SWSS-3); the DEIS states that the TWE route would avoid all active pocket gopher mounds by 75 m, unless live-trapping is conducted, to determine the gopher species using the mounds. When the species is determined, Wyoming pocket gopher mounds would be avoided, but northern pocket gopher mounds could be destroyed.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
Poppitt, Gordon	443-663	So, the issues we have is the one that the company proposed is illogical for several reasons, one of which is, obviously, from their standpoint, the routing would be the shortest and, so, essentially save them money, cost. But, there are so many adverse effects of it coming through there. Already, that power corridor which comes essentially from New Castle -- New Castle's in Cedar -- New Castle, Enterprise, then down Highway 18, and then passes on the east side of Mountain Meadow Monument, that is already saturated. And, in fact, the in-process lines that are going through there now from Rocky Mountain Power already oversaturate what was the planned power corridor.	Thank you for your comment.
Poppitt, Gordon	443-665	The biggest problem is by putting it east of even this Red Butte one, it would be very predominantly visible from Highway 18, because the routing would not allow it to go beyond the hills. It would have to be on the surface of the community. So, it would visually, esthetically be detrimental. I think it could possibly be claimed that it would adversely affect wildlife habitat in that area. The mule deer populations are down, not necessarily because of this, but it wouldn't do it, it wouldn't be advantageous to put this through. It would just enlarge the problem.	Thank you for your comment.

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Poppitt, Gordon	443-666	None of the power comes into Utah. None of it comes into, certainly, not into Central, because that's the purpose of Rocky Mountain Power putting in their line. And since it's going to be for the benefit, cost benefit of users in California, Nevada and parts of northern Arizona, the optional route that the agency or agencies have proposed is, first of all, it's more not only logical, but it's going to be more effective. They are going to have less disturbance. And I'm sure there will be some resistance from people that do grazing on that, on the Nevada side. But I don't think it's going to be as detrimental to them as it is to us.	Thank you for your comment.
Poppitt, Gordon	443-667	I feel that should it go through Central, property values will probably plummet by maybe as much as 50 percent, which means that Washington County, if the values go down, the taxes go down from those properties, so Washington County loses there. They may gain money from having the lines put through Washington County, but I think it works backwards for them too.	Thank for your comment regarding the potential effects on property values in Central associated with the location of power lines through the unincorporated community. Statements of opinion do not require specific responses or text revisions under NEPA regulations. However, your comment will be considered by the BLM and documented in the administrative record for associated with this EIS.
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Poppitt, Gordon	443-668	And I think, my thought is, my contention is, actually, that it will continue to depreciate the values in Central. We already are loaded up with five existing power lines. We have the gas lines which go across 18 north of Central which are not detrimental in that aspect. The substation at Red Butte has been expanded by another 50 acres already. And it just seems that because Central is in an unincorporated area it's probably, my honest feeling is that's been looked upon as the outhouse of Washington County.	Thank for your comment regarding the potential effects on property values in Central associated with the location of power lines through the unincorporated community. Statements of opinion do not require specific responses or text revisions under NEPA regulations. However, your comment will be considered by the BLM and documented in the administrative record for associated with this EIS.
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Poppitt, Gordon	443-669	But, anyway, my major comment is, I am totally in favor of the agency's recommendations. They are far more logical and justifiable than those of the company trying to put the power line through in these projects.	Thank you for your comment.
Quarter Mile Ranch	235-261	We think this transmission project will hurt the wildlife and natural environment. Our property has a sage-grouse nesting ground, we have ferrets, elk, deer, eagles, and horned toads which we feel would become non-existent if this transmission line were to be put into place. There are also many fossils on the property.	Thank you for your comments. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
Quarter Mile Ranch	425-631	Everybody likes to protect their property, and I just can't see where they have to go that route. I really can't. They need to stay more on state and BLM property, but then the hunters are complaining. We would prefer the TransWest Express preferred line because that would not impact as many private properties, and on our property we find petrified turtles and fossils, a whole vein.	Thank you for your comment.
Rasmussen, Dale	606-861	We feel that the route that the BLM has chosen for this project is the best choice for Roosevelt City and the homes that are close to the area.	Thank you for your comment.
Rasmussen, Dale	606-919	If for some reason that the line doesn't follow the "first choice" route that the BLM picked, that the line should go south of Roosevelt City limits and NOT follow the existing line that goes through Roosevelt City but go south of Roosevelt City to miss tribal land and the more density populated area south of Roosevelt.	Thank you for your comment.
Red Rock Audubon Society	578-908	We very strongly object to a portion of the BLM's proposed route in Nevada. The BLM preferred alternative in Nevada departs from the already established corridor near Cedar City, Utah and proceeds west into Nevada south of Panaca Summit and then turns south across the Clover Mountains and Tule Desert to rejoin the existing corridor near Toquop Wash. In Nevada, this preferred route establishes many miles of new corridor through an almost pristine area with strong wilderness characteristics, part of which is adjacent to the already designated Clover Mountains Wilderness.	Thank you for your comment.
Resident,	238-267	I'm incredibly disappointed in one of the potential routes that will affect many individuals and families in my community. It defies logic that The Bureau of Land Management and TWE would mitigate many of the positive impacts of this project by going literally hundreds of miles out of the way into Garfield and Rio Blanco Counties.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Resident,	238-268	you have many routes that would be better for TWE and the surrounding communities that can be built in existing corridors. I'm not sure who even came up with the idea to go hundreds of miles out of the way into counties that don't need to be affected by the line! But regardless of where the idea came from, it's time to remove it from consideration.	Thank you for your comment.
Rice, Staci	194-560	Because I'm a travel agent and have traveled all over the United States, I was most interested in what this new "Direct Current" transmission line will look like for tourists and visitors. I was surprised to see it's just another regular old power line, it really doesn't look any different from anything else you see all over the West. But, based on the pictures you put in chapter 3.12, I think you should pick the "Guyed" structures because you see them the least. And I think you should try to put the power line wherever there are forested areas that already have power lines because the trees help hide the structures from your view.	Thank you for your comment.
Rich, Lila	445-503	We don't probably have a problem with the Agency-preferred, but the applicant-preferred looks like it will go across our property. And we have a pivot there that it could very easily interfere with, and we would fight that.	Thank you for your comment.
Ritter, Lindsay	585-874	approve the preferred route selected by TransWest and the various counties and communities it has worked with throughout this complex process. The shortest and most direct route is the most effective one and the one with the least environmental problems.	Thank you for your comment.
Robidoux, J.	140-121	As such, careful consideration needs to be given to both the amount of miles each proposed route covers as well as the amount of material necessary to construct the towers along each route. Of all the routes, Alternative A - across all regions - is the shortest, most direct transmission route that utilizes public lands and utility corridors, minimizes disturbances due to road creation and tower construction	Thank you for your comment.
Rowley, Kevin J.	206-566	I disagree with any argument that places these lines through areas of farm and residential lands where there is an option to go around on mostly uninhabited lands. I feel that this is the case for your proposed line through Duchesne County, Utah. The best possible route is the southern route away from homes, farms, and recreational water ways. Please place your lines as far as possible from public access and view. Once in place these dangerous and unsightly lines render the property beneath and around them virtually worthless for any future development, sale, or production.	Thank you for your comment.
Ryno, Lori	383-582	The wind transmission line shouldn't be any longer than absolutely needed, however, to minimize our costs and to minimize environmental footprint and impact on wildlife and habitat. I request that you eliminate route Alternative I-C, eliminate route Alternative II-C, and eliminate route Alternative II-B in Wyoming, Colorado, and Utah. Those routes are longer and costlier than needed and unnecessarily harmful to the environment. Alternative I-A in Wyoming, Colorado and Utah is shorter, more direct and looks from the analysis much less harmful on balance than Alternative I-D and II-F, therefore Alternative I-A and II-A is the best route to select.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. The alternatives retained for detailed analysis in the Draft EIS (I-C, II-C, II-B, I-D, and II-F) were developed to address resource impacts or conflicts. Accordingly, they will continue to be retained for detailed analysis in the Final EIS. For a detailed disclosure of the relative impacts of all the alternatives, see Chapter 3 of the Final EIS.
Ryno, Lori	383-582	The wind transmission line shouldn't be any longer than absolutely needed, however, to minimize our costs and to minimize environmental footprint and impact on wildlife and habitat. I request that you eliminate route Alternative I-C, eliminate route Alternative II-C, and eliminate route Alternative II-B in Wyoming, Colorado, and Utah. Those routes are longer and costlier than needed and unnecessarily harmful to the environment. Alternative I-A in Wyoming, Colorado and Utah is shorter, more direct and looks from the analysis much less harmful on balance than Alternative I-D and II-F, therefore Alternative I-A and II-A is the best route to select.	In their selection of the preferred alternative for the TransWest Express Project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. The alternatives retained for detailed analysis in the Draft EIS (I-C, II-C, II-B, I-D, and II-F) were developed to address resource impacts or conflicts. Accordingly, they were retained for detailed analysis in the Final EIS. For a detailed disclosure of the relative impacts of all the alternatives, see Chapter 3 of the Final EIS.
Schmitt, Marjorie	148-134	Alternative II-A would show more impact - due to a higher concentration of privately-owned land along that corridor. Please go south - less impact on fewer people.	Thank you for your comment.
Spaulberg, Olivia	153-144	As this moves forward, I ask that you review and revise Route I-D. Route I-D is sixteen miles longer and has fifteen more miles of access roads. The overall total disturbance of Route I-D is 249 miles more than Route I-A. This is an unnecessary addition of time, materials, and infrastructure that is not supported by analysis. There is also a question as to the purpose of the Route I-D as it doesn't follow a designated above ground energy corridor.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
Sperry, Mike	451-527	It would also be wonderful to have the point of consumption be where the power is produced instead of having a thousand-mile corridor that goes across a thousand different miles of people's private property, government property, property that they enjoy.	Thank you for your comment. The proposed action is not a BLM-generated action. TransWest submitted a request to the BLM for a ROW across public lands in order to build a transmission line. As stated in Chapter 1 of the Draft EIS, the BLM's purpose and need is to consider the ROW application in accordance with 43 CFR Part 2800. The EIS process discloses the environmental effects of granting that ROW, including an analysis of alternatives to the proposed route across federal lands. However, it is beyond the scope of the lead agencies' decision to be made, and therefore, this EIS analysis, to identify potential sources of this energy (See Sections 1.1.1.1. and 1.1.2.1 of the Draft EIS).
Sperry, Mike	451-527	It would also be wonderful to have the point of consumption be where the power is produced instead of having a thousand-mile corridor that goes across a thousand different miles of people's private property, government property, property that they enjoy.	Thank you for your comment. The proposed action is not a BLM- or Western-generated action. TransWest submitted a request to the BLM for a ROW across public lands in order to build a transmission line. As stated in Chapter 1 of the Draft EIS, the BLM's purpose and need is to consider the ROW application in accordance with 43 CFR Part 2800. The EIS process discloses the environmental effects of granting that ROW, including an analysis of alternatives to the proposed route across federal lands. However, it is beyond the scope of the lead agencies' decision to be made, and therefore, this EIS analysis, to identify potential sources of this energy (See Sections 1.1.1.1. and 1.1.2.1 of the Draft EIS).
Sperry, Mike	451-528	It would also be good to be able to not have the corridor go across gravesites as this one does or across campgrounds as this one does or right next to homes as this one does. It would be great if the corridor would follow the existing corridors that are in place in the county down the canyons so we don't have to have eight different power lines spaced apart down our canyon, if they could all follow each other.	Thank you for your comment.
Stocks, Kristin	694-1851	The BLM comments in the Saratoga Sun on August 28, 2013, prompted me to write this letter about the pending Transwest Express power line project. It is very important to me where this power line is placed in our county. I serve my community as a member of the Dixon Town Council and have had numerous discussions about the location of this line with both residents of Dixon and Baggs. It seems pretty clear to me based on these discussions that route "Alternative I-A" makes the most sense for our community. I understand that the topography is an issue for the BLM. I do not understand how "high topography" affects this placement that much. There are plenty of currently existing transmission lines that run in "high topography" areas all around this portion of the US without issue. I am sure the engineers on the project would not have proposed a route that was a considerable issue. As an engineer myself, I usually don't propose locations that are high risk or high difficulty because those decisions usually cost a good bit more money.	Thank you for your comment.
Stocks, Kristin	694-1853	As you may know the Town of Baggs and its general area is a pretty highly traveled route in the US. I am from the South and many people know where very few places are in Wyoming, however, one of them commonly seems to be Baggs. It has surprised me the number of people that have driven through Baggs to get to other places in journeys out West. I would prefer to keep the area that is traveled through as free from this highly visible industrial line as possible. I don't want us to be known as the little town with the big power line. I do understand that the Cherokee Historic Trail is also an issue for this location, however considering the development that already exists along this route from Oil and Gas and general access roads in the area, I don't see how this line will have considerable additional impact.	Thank you for your comment.
Sweetwater County Wyoming	195-705	Sweetwater County's preferred Alternative Route for the Trans West Project is the identified as the Applicant's Proposed 1-A on Figure 2-4 on page 2-8 of the DEIS. This Route has been agreed upon by Carbon, Moffat and Sweetwater Counties, and for the purposes of this letter, this Route is referred to as the Tri-County Alternative. If Carbon County decides to shift its support from the Tri County Alternative to the Alternative Route identified as the Agency Preferred I-D on Figure 2-4 on page 2-8 of the DEIS, Sweetwater County would support Carbon County's change in position favoring the Agency Preferred Route I-D	Thank you for your comment.
Sweetwater County Wyoming	195-706	Due to its close proximity to Adobe Town, Willow Creek Rim and Powder Mountain Regions, and its potential conflicts with existing and proposed major underground gas pipelines, Sweetwater County does not support Alternative Route I-B as identified on Figure 2-4 of page 2-8. This position is supported by the presence of Visual Resource Inventory Ratings of Class II and III, higher viewer sensitivity levels, and a designated underground utility (pipeline) corridor existing in the same location as the proposed Alternative Route I-B.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Sweetwater County Wyoming	195-707	Sweetwater county's first preference for the location of the Ground Electrode System is the Separation Creek Alternative. This location would be the closest to the Transmission Line and will require the least amount of disturbance (see DEIS Appendix D, Map Exhibit 5). Sweetwater County's second choice for the Ground Electrode System would be the Separation Flat Proposed Site. Since the Shell Creek Alternative is adjacent to the Adobe Town WSA and requires a power line that would parallel the Haystacks region, this is Sweetwater County's least supported Alternative.	Thank you for your comment.
Sweetwater County Wyoming	195-712	Sweetwater County appreciates and supports the three Additional Mitigation measures proposed by the BLM in the DEIS in Section 3.17 on Page 3.17-23 of the DEIS. These measures include: 1) Developing a proactive housing plan in conjunction with the Wyoming Industrial Siting Council and local officials; 2) Encouraging contractors to support local sales and use taxes by purchasing supplies locally and delivering freight FOB within the counties where it will be utilized; and 3) Conducting annual coordination meetings to ensure local needs and services are addressed. Sweetwater County believes that these measures, if implemented by TransWest, will help ameliorate potential negative socio-economic impacts.	Sweetwater County's comment regarding the suggested mitigation measure is noted. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in the FEIS.
Sweetwater County Wyoming	195-712	Sweetwater County appreciates and supports the three Additional Mitigation measures proposed by the BLM in the DEIS in Section 3.17 on Page 3.17-23 of the DEIS. These measures include: 1) Developing a proactive housing plan in conjunction with the Wyoming Industrial Siting Council and local officials; 2) Encouraging contractors to support local sales and use taxes by purchasing supplies locally and delivering freight FOB within the counties where it will be utilized; and 3) Conducting annual coordination meetings to ensure local needs and services are addressed. Sweetwater County believes that these measures, if implemented by TransWest, will help ameliorate potential negative socio-economic impacts.	Sweetwater County's comment regarding the suggested mitigation measure is noted. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in the FEIS.
The Wilderness Society	164-1460	While our comments do identify the routes with the lowest impacts to environmental resources and values, which we strongly recommend that TWE follow if the project is approved, we are not supporting any routes at this time.	Thank you for your comment.
The Wilderness Society	164-1463	All of the potential TWE routes would have significant impacts.	Thank you for your comment.
The Wilderness Society	164-1466	Given our current knowledge, if TWE is approved, it should follow these route segments. - Wyoming segments: 20; 30; 40; 110.00;115.00; 150.05; 140.00; 140.05; 190.00- Colorado segments: 190.00; 190.05; Option 1 at Tuttle Micro-Siting (south of Hwy 40 – based on our understanding, Option 1 is segment 101.10); 100; 210- Utah segments: 320.10; 320.101; 320.102; 320.103; 320.15; 320.151; 320.152; 500; 500.02; 500.05; 501.10; 502.05- Nevada segments: 502.05; 530; 540; 590; 600; 620; 630; 660; 700; 720; 740; 790	Thank you for your comment.
The Wilderness Society	164-1474	<p>While we appreciate commitment to future consideration of impacts and mitigation measures, the lack of details regarding off-site mitigation in the DEIS make it impossible to fully and fairly evaluate the impacts of the proposed TWE project. It is unacceptable to wait until after the ROD is signed to identify and require specific off-site mitigation measures. Conservation opportunities across ownerships at landscape level scale should be pursued as mitigation where possible. We need to preserve the ability of species and habitats to adapt to a changing climate. Climate impacts are occurring now and have measurable impacts on the landscape. Consequently larger scale conservation efforts provide a useful hedge against expected impacts the extent to which cannot be precisely forecast today. Such approaches to mitigation are being employed in the State of California in the BLM and DOE California Desert Renewable Energy Conservation Plan (DRECP). They should be considered here as well.</p> <p>In accordance with BLM policy, the following factors indicate that off-site mitigation is appropriate for this project:</p> <ul style="list-style-type: none"> - TWE is a major electrical right-of-way project, one of the types of large development projects for which offsite mitigation (at the scale necessary) may be appropriate; - TWE is likely to affect resources and values of high public importance; and - TWE may have permanent impacts that cannot be mitigated on-site. 	Thank you for your comment. The EIS contains mitigation measures designed to avoid and minimize Project-related impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation measures are necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the ROD.
The Wilderness Society	164-1475	BLM has recently published a Draft Regional Mitigation Manual which includes requirements and guidance on off-site mitigation.6 President Obama also recently issued a Presidential Memorandum on improving siting, permitting and mitigation for transmission development. Both of these documents offer valuable tools for continuing to improve the conservation outcomes for mitigation for project impacts, and should be used to improve mitigation for TWE in the FEIS.	Thank for your comment. To the extent applicable, the referenced sources will be used to inform the development of offsite mitigation for residual impacts.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1476	There are numerous resources with additional information on best practices for mitigation for transmission line planning and development. These include, but are not limited to the following:- The Avian Power Line Interaction Committee’s updated guidance document – “Reducing Avian Collisions with Power Lines: State of the Art in 2012” available at: http://www.aplic.org/ - Edison Electric Institute’s “Mitigating Bird Collisions with Power Lines” available at: http://www2.eei.org/products_and_services/descriptions_and_access/mitigating_birds.htm - Western Resource Advocates’ “Smart Lines” report, available at: http://www.westernresourceadvocates.org/energy/smartlines.php ; and- Wild Utah Project’s “Best Management Practices for Siting, Developing, Operating and Monitoring Renewable Energy in the Intermountain West” available at: http://wildutahproject.org/files/images/BMP%20for%20Renewable%20Energy-2012-WUP.pdf	Thank you for providing these potential sources of information. APLIC publications (both the 2006 electrocution manual and the 2012 collision manual) are cited extensively in the TWE EIS.
The Wilderness Society	164-1510	Conservation opportunities across ownerships at landscape level scale should be pursued as mitigation where possible. We need to preserve the ability of species and habitats to adapt to a changing climate. Climate impacts are occurring now and have measurable impacts on the landscape. Consequently larger scale conservation efforts provide a useful hedge against expected impacts the extent to which cannot be precisely forecast today. Such approaches to mitigation are being employed in the State of California in the BLM and DOE California Desert Renewable Energy Conservation Plan (DRECP). They should be considered here as well.	Comment noted. Transwest has committed to the construction and operation of TWE being compliant with all applicable federal and state-required measures for avoiding and minimizing Project-related environmental impacts. Refer to Appendix C of the EIS for existing BLM and USFS land use stipulations, Applicant-committed environmental protection measures, and additional proposed mitigation measures. The need for offsite compensatory mitigation will be identified in the ROD following review of the residual impacts sections of the Final EIS and completion of the greater sage-grouse HEA process. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1518	Given the breadth of avian impacts anticipated to occur with this line, including to sensitive species, the APP must be made available for public review and comment prior to the release of the FEIS. Ongoing impacts to avian species during construction and operation of the line must be provided to the public in a transparent manner, with members of the public given opportunities to participate in the ongoing development of the APP.	The Avian Protection Plan will be available as an appendix to the Final EIS. This will allow the public and agencies the opportunity to review it prior to the Record of Decision for the Project. Additionally, TransWest will continue to coordinate with agencies on the Avian Protection Plan and revise as necessary prior to project construction.
The Wilderness Society	164-1520	In the FEIS, the Agencies should include additional improvements for mitigation for TWE, including the entire mitigation hierarchy of avoiding, minimizing and off-setting impacts. The Agencies should use the tools provided in the BLM Draft Regional Mitigation Manual and the Presidential Memorandum on transmission siting, permitting and mitigation. The Agencies should also demonstrate how the approaches used for TWE are consistent with the BLM Draft Regional Mitigation Manual and the Presidential Memorandum. In addition, clarification needs to be made on how mitigation documents being currently developed by the BLM and USFWS, in regards to Greater Sage-grouse, will be applied to this proposed project. We provide specific recommendations for mitigation measures in Appendices A-D on the routes.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS. The lead agencies will consider the information provided in the referenced documents in identifying final mitigation requirements for the Project, if approved, in the ROD.
The Wilderness Society	164-1536	The DEIS proposes implementation of various measures to identify sensitive areas to GRSG (e.g. leks, nesting habitat, wintering habitat, etc.) and implement seasonal timing restrictions and protection buffers in accordance with various Instructional Memorandums, Executive Orders, and existing Resource Management Plans (RMP). Adherence to these regulations and guidelines is being presumed to reduce impacts to GRSG. However, there are fundamental flaws with this rational and challenges for stakeholders to have assurances of meaningful protection for grouse. Specifically, (1) these RMPs are often dated and founded on inaccurate/inadequate protections, (2) field offices present an inconsistently wide range of protective measures, (3) these protections are primarily limited to construction only, (4) not all aspects of GRSG biology or habitat needs are adequately addressed, (5) monitoring and enforcement are poorly addressed, (6) off-site mitigation is inadequately considered, and (7) areas serving as refugia, such as unfragmented landscapes, are not identified for stronger protections. Some of these concerns are addressed in further detail below.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the EPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1550	The best way to protect the most valuable and essential remaining habitat and further recovery goals is to provide assured protections to the most important remaining sage-grouse habitat. These lands should be identified and protected with prioritization afforded to 1) core/priority habitats lands, 2) adjacent or stand-alone habitat where large intact blocks remain, (including those in non-core habitat), and 3) the special habitat types which may be limited within a given area (breeding, nesting, brood-rearing, winter, and connectivity habitats).	Thank you for your input. While statements of opinion do not require specific responses or text revisions under NEPA regulations, they will be considered by the lead agencies and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1557	Based on our analysis of the DEIS and field investigations, the route with the lowest environmental impacts going through Wyoming traverses segments 30, 40, 110.00, 115.00, 150.05, 140.00 (with a slight deviation described below), 140.05, and 190.00 (DEIS Figure 2-21).	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1558	Northern Potential Ground Electrode Siting AreasSix potential ground electrode siting areas are proposed for Region 1. Of the six, Eight Mile Basin is collectively identified as having the lowest environmental impact. The four located in Wyoming are reviewed in detail below. - Eight Mile Basin: Lowest environmental impact – amount of habitat disturbance, number of raptor nests, (2 non-special and 6 special status), impacts to mule crucial winter/yearlong range (66 acres of indirect)- Separation Flats: Moderate environmental impact - amount of habitat disturbance, number of raptor nests within 1 mile (6 non-special and 46 special status), indirect impact to Shamrock Hills Raptor Concentration IBA, impacts to pronghorn crucial winter/yearlong range (351 acres of indirect)- Shell Creek: Moderate environmental impact - amount of habitat disturbance, number of raptor nests within 1 mile (2 non-special and 50 special status), impacts to mule crucial winter/yearlong range (12 acres of indirect)- Separation Creek: Highest environmental impact – amount of habitat disturbance, number of raptor nests within 1 mile (12 non-special and 105 special status), impacts to pronghorn crucial winter/yearlong range (102 acres of direct and 4,343 of indirect), impacts to mule deer crucial winter/yearlong range (34 acres of direct and 1,880 of indirect)	Thank you for your comment.
The Wilderness Society	164-1559	Segment 30 (All Alternatives) <ul style="list-style-type: none"> - Lowest environmental impact - Already moderately disturbed and fragmented - Intersects Greater South Pass Core Area, but utilizes the Executive Order 2011-05 (Greater Sage-grouse Core Area Protection) designated transmission corridor. South Rawlins Core Area is also just south of the segment. Greater Sage-grouse (GRSG) 25% regional breeding density polygon3 overlaps the segment just east of the designated transmission corridor (indicating the highest density of breeding birds and of the highest conservation priority). Given Core Areas and documented breeding densities, this segment warrants conservative management going forward to minimize impacts to grouse. [See Figure WY-1 below] - Shamrock Hills Important Bird Area is 2.7 miles north of segment 30, causing concern about impacts to raptors. BLM will need strong mitigation/minimization efforts, especially as ferruginous hawk populations are declining. Options that should be considered by the BLM and the proponent include but are not limited to designation of an ACEC and conservation easements to benefit raptors. [See Figure WY-2 below] “The area is known as one of the largest breeding grounds for ferruginous hawks in the western U.S. Other migratory birds known to utilize this IBA include golden eagle, burrowing owl, northern harrier, prairie falcon, American kestrel, great horned owl, and red-tailed hawk.” (DEIS p.3.7-27) 	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1560	Segment 40 (Alternative A, B, & D) <ul style="list-style-type: none"> - Lowest environmental impact - Continental Divide – Creston (CD-C) gas field (8,950 wells) overlaps this segment – already heavily disturbed (DEIS Figure 3.2-5) 	Thank you for your comment.
The Wilderness Society	164-1561	Segment 50 (Alternative B)- Moderate environmental impact (but of concern due to where it leads)- Although this segment likely has a lot of disturbance already, concerned about route going south from here (into high environmental impact segments 60 & 70)- CD-C gas field (8,950 wells) overlaps this segment (DEIS Figure 3.2-	Thank you for your comment.
The Wilderness Society	164-1562	Segment 60 (Alternative B) <ul style="list-style-type: none"> - Moderate environmental impact (but of concern due to where it leads) - Although the northern portion of segment 60 likely has a lot of disturbance already, concerned about route south from here (segment 70 – high environmental impacts), - CD-C gas field (8,950 wells) overlaps this segment (DEIS Figure 3.2-5) - GRSG 75% regional breeding density polygon1 overlaps the segment (indicating high density of leks and breeding birds and of high conservation priority) [See Figure WY-1 below] 	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1563	<p>Segment 70 (Alternative B)</p> <ul style="list-style-type: none"> - Highest environmental impact – sage-grouse, Adobe Town CPWA, Powder Rim IBA - CD-C gas field (8,950 wells) overlaps northern end of this segment (DEIS Figure 3.2-5) - GRSG 75% regional breeding density polygon1 overlaps the northern end of this segment (indicating high density of leks and breeding birds and of high conservation priority) [See Figure WY-1 below] - Adobe Town CPWA abuts the segment, to the west - Powder Rim IBA overlaps southern end of segment [See Figure WY-2 below] “Because juniper habitat is limited in Wyoming, the bird community at Powder Rim IBA is unique and has significant conservation value. The juniper woodlands have been shown to support greater bird species diversity than the surrounding shrubland habitat.” (DEIS p.3.7-26) 	Thank you for your comment.
The Wilderness Society	164-1564	<p>Segment 110 (Alternative A and Alternative D – Applicant and Agency Preferred) - Request clarification on why the segment deviates from Wamsutter-Dad road at the southern end of the segment</p> <ul style="list-style-type: none"> - Lowest environmental impact - Northern portion aligns with the BLM's preferred route for Gateway South - Through CD-C gas field (8,950 wells), heavy drilling activity on both sides (DEIS Figure 3.2-5) - Near a graded roadway (Wamsutter-Dad road) most of the way to Dad, already disturbed and fragmented, but veers away to the south from this road toward southern end of segment 	Thank you for your comment.
The Wilderness Society	164-1565	<p>Segment 110.05 (Alternative A – Applicant Preferred)</p> <ul style="list-style-type: none"> - Lowest environmental impact (but of concern if it is linked to segment 120) - Veers south and away (to the west) from Wamsutter/Dad road, through disturbed and fragmented area - Segment is entirely overlapped by CD-C gas field (8,950 wells, DEIS Figure 3.2-5) 	Thank you for your comment.
The Wilderness Society	164-1567	<p>Segment 115.00 (Alternative D – Agency Preferred) - Request consideration of the Gateway South's BLM Preferred Alternative, which deviates slightly from this segment. It parallels the Wamsutter/Dad road and may have fewer impacts than Segments 110/115.</p> <ul style="list-style-type: none"> - Lowest environmental impact - Segment reconnects to existing graded Wamsutter-Dad road, doesn't run along existing roads but traverses numerous small roads - Segment overlapped entirely by CD-C gas field (8,950 wells, DEIS Figure 3.2-5) - Muddy Creek crosses this segment and Muddy Creek IBA overlaps southern end of this segment (along western edge). High conservation value (see text above). [See Figure WY-2 below] 	Thank you for your comment.
The Wilderness Society	164-1568	<p>Segment 115.05 (Alternative D) - Mexican Flats to Sand Creek Road- Moderate environmental impact – sage-grouse and Muddy Creek wetlands- Gateway South Preferred Alt is co-located with this segment – good but still conservation value- This segment overlapped entirely by CD-C gas field (8,950 wells, DEIS Figure 3.2-5)- GRSG 75% regional breeding density polygon1 overlaps the southern half of this segment (indicating high density of leks and breeding birds and of high conservation priority) [See Figure WY-1 below]- Concerned that being near HWY 789, while not adjacent to it (which would be preferable), widens impact corridor- Muddy Creek Important Bird Area overlaps northern end of this segment, on both sides of the segment. These wetlands contain high conservation value. [See Figure WY-2 below]“Hundreds of species of waterbirds, shorebirds, and waterfowl from both the Pacific and Central flyways utilize the area for breeding and migration. The diversity of habitats provides an oasis for a large variety of bird species ... The wetlands support up to 50,000 ducks during migration and a host of breeding shorebirds.” (DEIS p.3.7-26)</p>	Thank you for your comment.
The Wilderness Society	164-1569	<p>Segment 130 (Alternative C)</p> <ul style="list-style-type: none"> - Moderate environmental impact – sage-grouse and Muddy Creek wetlands - In Highway 789 corridor, landscape already fragmented by gas development and power lines - High grouse densities (high conservation value) on northern end of this segment – Greater South Pass Core Area overlaps as does GRSG 25% regional breeding density polygon1 (indicating the highest density of leks and breeding birds and of the highest conservation priority) [See Figure WY-1 below] 	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1572	Segment 190.00 (Alternative C) - Lowest environmental impact - Atlantic Rim field overlaps the segment - Segment traverses mostly developed agricultural land - Numerous existing roads throughout the area this segment would traverse, including US Highway 70, County Roads 702, 722, and many unnumbered dirt roads - Crosses Little Snake River	Thank you for your comment.
The Wilderness Society	164-1573	Segment 115.07 (Alternative D) - north of Baggs Alternative Connector, west from Baggs area - Request clarification and specific analyses from BLM of potential impacts of this segment on raptors, other avian species, and big game species related to juniper upland habitat - Highest environmental impact – sage-grouse, low level of existing disturbances on landscape (minimal habitat fragmentation), significant visual impacts - Runs along or near Sand Creek road - Not within any existing oil and gas fields (see DEIS Figure 3.2-5) · Minimal existing disturbance - Minimal existing habitat fragmentation - Project corridor encompasses at least 4 GRSG lek sites - GRSG 75% regional breeding density polygon1 overlaps the eastern half of this segment (indicating high density of leks and breeding birds and of high conservation priority) [See Figure WY-1 below]	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1574	Segment 115.10 (Alternative D) - north of the Baggs Alternative Connector - Highest environmental impact – Powder Rim IBA, significant visual impacts, unfragmented habitat - Segment entirely encompassed within the Powder Rim IBA (see text above) [See Figure WY-2 below] - Virtually no existing disturbance or habitat fragmentation - Significant visual impacts in a currently undeveloped landscape	Thank you for your comment.
The Wilderness Society	164-1575	Segment 170.00 - Baggs Alternative Connector - Request clarification and specific analyses by BLM on impacts of this route on raptors and other avian species related to juniper upland habitat (see * note below for Segment 170.05) - Moderate environmental impact – sage-grouse, raptors, other avian species - GRSG 75% regional breeding density polygon1 overlaps the entire segment (indicating high density of leks and breeding birds, and of high conservation priority) [See Figure WY-1 below]	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1576	Segment 170.05 - Baggs Alternative Connector - Request clarification and specific analysis by BLM on impacts of this route to avian species related to juniper upland habitat and comparable raptor information for segment 115.07 (see * note below)- Moderate environmental impact – grouse, raptor, mule deer and pronghorn impacts- Overlapped in the central portion by South Baggs oil and gas field (DEIS Figure 3.2-5)- Existing surface disturbance from underground line and numerous roads- GRSG 75% regional breeding density polygon1 overlaps the eastern third of this segment (indicating high density of leks and breeding birds, and of high conservation priority) [See Figure WY-1 below]- Would overlap with critical habitat for mule deer (19,430 acres) and pronghorn (13,981 acres)* Note: According to the DEIS (p. 4-88, p.3.7-56, p.3.8-78), segments 170.00 + 170.05 have the following raptor impacts (uncertainty remains on how this compares to the more northerly segment 115.07):- 40 non-special status raptor nests within 1 mile (31 of these nests, for which spp is not known, potentially could be utilized by special status raptor species)- 42 special status raptor nests (9 of which are GOEA)- 13,981 acres of raptor nest buffers	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1577	Segment 116.00 - Fivemile Point North Alternative Connector - Request clarification and specific analyses by BLM on comparable raptor information for other segments, especially connecting segment 115.07 (see * note below) - Highest environmental impact – raptor impact - GRSG 75% regional breeding density polygon1 overlaps entire segment (indicating high density of leks and breeding birds, and of high conservation priority) [See Figure WY-1 below] - Would overlap with critical habitat for mule deer (2,187 acres) * Note: Appears to have serious impacts to raptors, from DEIS p. 4-88, p.3.7-56, p.3.8-78 - 19 non-special status raptor nests within 1 mile (6 of these nests, for which spp is not known, potentially could be utilized by special status raptor species) - 18 special status raptor nests (4 of which are GOEA) - 2,186 acres of raptor nest buffers	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1578	<p>Segment 117.00 - "Fivemile Point South Alternative Connector" - Request clarification and specific analyses by BLM on comparable raptor information for other segments, especially connecting segment 115.07 (see * note below)</p> <ul style="list-style-type: none"> - Moderate environmental impact - sage-grouse, raptors - Significant existing disturbance (roads, power lines, rural development) - GRS 75% regional breeding density polygon1 overlaps entire segment (indicating high density of leks and breeding birds, and of high conservation priority) [See Figure WY-1 below] - Would overlap with critical habitat for mule deer (999 acres) <p>* Note: Appears to have impacts to raptors, though less than segment 116.00 from DEIS p.4-88, p.3.7-56, p.3.8-78</p> <ul style="list-style-type: none"> - 1 non-special status raptor nests within 1 mile (this nest, for which spp is not known, potentially could be utilized by special status raptor species) - 3 special status raptor nests (none of which are GOEA) - 274 acres of raptor nest buffers 	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1579	<p>Segments 160, 150, and 150.05 - Mexican Flats Alternative Connectors</p> <ul style="list-style-type: none"> - Moderate environmental impact – big game, raptors, mountain plovers - Significant existing surface development (numerous roads, gas development) - Within CD-C gas field (8,950 wells) - Would overlap with critical habitat for mule deer (290 acres) and pronghorn (2,061 acres) - Nesting concentration area for mountain plovers, a BLM Sensitive Species4. In 2000, 8 nesting pairs were recorded in this area and 23 birds were recorded after the nesting season in 2001 (Fritz Knopf, pers. Comm.). - Appears to have serious impacts to raptors, from DEIS p. 4-88, p.3.7-61, p.3.8-78 <ul style="list-style-type: none"> o 3 non-special status raptor nests within 1 mile (these nests, for which spp is not known, potentially could be utilized by special status raptor species) o 11 special status raptor nests o 5,507 acres of raptor nest buffers 	Thank you for your comment.
The Wilderness Society	164-1580	<p>Segment 180.00 and 180.05</p> <ul style="list-style-type: none"> - Highest environmental impact – Powder Rim IBA, visual, habitat fragmentation - Segment entirely encompassed within the Powder Rim IBA (see above) [Figure WY-2 below] - Virtually no existing disturbance or habitat fragmentation - Significant visual impacts in a currently undeveloped landscape 	Thank you for your comment.
The Wilderness Society	164-1581	<p>The route with the likely lowest environmental impacts through Colorado is presented as Alternative C, and roughly parallels Colorado Highway 13 south to Craig, Colorado and then roughly parallels US Highway 40 west into Utah. The segments that appear to be associated with this route in the DEIS are: 190.00; 190.05; Option 1 at Tuttle Micro-Siting (south of Hwy 40 – based on our understanding, Option 1 is segment 101.10); 100; 210.</p>	Thank you for your comment.
The Wilderness Society	164-1584	<p>The area would sit directly on the banks of the Little Snake River, which is free-flowing and has regular spring flooding events. This area is PPH for GSG and is winter range for elk, mule deer, and pronghorn. The area also overlaps with the South Nipple Rim State Trust Lands. The above ground line linking the ground electrode site to the larger TWE line would follow Moffat County Road 66N off of Sevenmile Ridge and would be visible from both the Spence gulch and West Sevenmile LWCs and could impact the documented wilderness characteristics wilderness characteristics of these units.</p> <p>Recommendation: Given the fact that both ground electrode siting options would cause a suite of adverse environmental impacts, the only reasonable alternative is to locate the ground electrode facility in Wyoming, if needed. The least environmentally damaging alternative in Wyoming is the Eight Mile Basin location, and thus our recommended location.</p>	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1585	<p>Segment 190.00 (Alternative 1-C – Hwy 13/Hwy 40 route)</p> <ul style="list-style-type: none"> - Likely lowest environmental impact of the routes - This route largely crosses lands that are already heavily impacted by exurban housing development, agricultural operations and other surface disturbing activities. This route, depending on final siting options within the analyzed corridors, could potentially impact small portions of the Serviceberry, Little Yampa Canyon, and Lone Tree Gulch Lands with Wilderness Character (LWC) units. However, with careful micro-siting, much of the impacts to these three LWC units could be averted. In comparison, the other two routes analyzed would impact more than a dozen LWC units, potentially causing irreparable harm to the wilderness characteristics of these units. . . In addition to avoiding most potential impacts to LWC's, this route overlaps with designated West-wide Energy Corridors along Highway 13 and US Highway 40. Although impacts to wildlife habitat along Highway 13 route are significant, as a whole they are likely less impactful than the other two proposed routes, as this route segment parallels existing impacts for substantial portions of its length. The total impacts of this route are much to do with the fact that the length of the route is substantially longer than the other two alternatives. The applicant and agency-preferred routes are shorter in length but cross through higher quality habitat and significantly higher quality roadless lands. Additionally, numerous types of wildlife habitat overlap in the Little Snake River/Sevenmile Ridge area (indicative of the area's importance to wildlife), while the wildlife habitat along the Highway 13 route is more diffuse in nature, and most importantly, the route follows existing impacts such as highways and powerlines, unlike the applicant proposed or agency preferred routes. 	Thank you for your comment.
The Wilderness Society	164-1587	<p>Traverses area with greater number of existing oil and gas fields (Figure 3.2-5, DEIS p.3.2-16) and an area that currently has the highest interest from the oil and gas industry (Niobrara shale).</p> <ul style="list-style-type: none"> - Lands with Wilderness Characteristics: <ul style="list-style-type: none"> o This route has by far the least impacts to LWCs. Both the Applicant-proposed and Agency-preferred routes have numerous and significant impacts to LWCs (as well as wildlife, visual resources, cultural resources, etc). o Serviceberry: intersected by the two mile wide corridor. o Little Yampa Canyon: intersected by the two mile wide corridor and 250' potential ROW. o Juniper Mountain: intersected by the two mile wide corridor and 250' potential ROW. o Lone Tree Gulch: intersected by the two mile wide corridor. - Citizens Proposed Wilderness: <ul style="list-style-type: none"> o Yampa River: intersected by the two mile wide corridor and 250' potential ROW. - Greater sage-grouse: significant acreage of Preliminary Priority Habitat; including a number of lek sites; northern portion overlaps 25-75% regional breeding density. 	Thank you for your comment.
The Wilderness Society	164-1644	<p>Big game: There is the potential for significant impacts to big game. Within the proposed route there are a number of migration corridors, particularly along the Highway 13 portion of the route. The Highway 40 section of the route traverses critical winter range for much of its length. The actual location of the line should be sited in close proximity to existing disturbances, such as the existing powerline ROW.</p>	Thank you for your comment.
The Wilderness Society	164-1647	<p>We recommend that the same suite of protections and prescriptions applied to Greater sage-grouse be applied for Columbian sharp-tailed grouse. Baseline population data should be provided in order to inform the public, monitor impacts and judge the efficacy of mitigation measures.</p>	Comment noted. Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state-required avoidance and minimization or mitigation measures relevant to special status species. The Columbian sharp-tailed grouse is listed as a BLM sensitive species and is treated as such in the FEIS. No change to text.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1650	<p>Segment 180.05 (Alternatives 1-A (Applicant-proposed), 1-B, and 1-D (Agency-preferred))</p> <ul style="list-style-type: none"> - High level of environmental impacts - All three of these routes generally follow the Little Snake River's path as it crosses the COWY state line and crosses into Moffat County. All three routes would also have significant impacts and the cumulative impacts to species such as sage grouse is a concern for this area given the relative large amount of oil and gas development that has taken place in fairly close proximity. Additionally, the segment intrudes upon three LWC units. - Lands with Wilderness Characteristics: <ul style="list-style-type: none"> o Cherokee Draw: intersected by the two mile wide corridor. o Anthill Draw: intersected by the two mile wide corridor and 250'ROW. o Reservoir Draw: intersected by the two mile wide corridor and 250'ROW. - Greater sage-grouse: While this segment doesn't cross large expanses of PPH, it does cut across a large portion of Preliminary General Habitat (PGH). Given the fact that research has still yet to clearly define the interrelationships and importance between different types of habitats utilized by sage grouse on a seasonal basis, the importance of the PGH is high. Additionally, the location of the line can conceivably be altered to avoid the majority of PGH as well as the PPH in the Anthill and Reservoir Draw areas. 	Thank you for your comment.
The Wilderness Society	164-1654	<p>See additional info on segments 180.20 and 180.05 from DEIS below</p> <ul style="list-style-type: none"> - Additional info on segments 180.20 and 180.05 (from Little Snake Field Office; DEIS p.4-84): 42 new miles of utility corridor <ul style="list-style-type: none"> o Overlaps with 8,087 acres of critical habitat for elk; 13,569 acres for mule deer; 8,352 acres for pronghorn. o Overlaps 49,110 acres of GRSG PPH o Overlaps 12,360 acres of raptor nest buffer zones 	Thank you for your comment.
The Wilderness Society	164-1655	<p>Segment 186.00 (Alternative 1-A (Agency-preferred) and Alternative 1-D)</p> <ul style="list-style-type: none"> - Very high environmental impacts - The route diverges from the applicant's preferred route in the south of the Powderwash area. The impacts to LWC's are significant throughout its run, but the impacts to sage grouse are somewhat less than the applicant's until the route crosses State Highway 13. - Lands with Wilderness Characteristics: <ul style="list-style-type: none"> o Reservoir Draw: intersected by the two mile wide corridor and 250'ROW. o Upper Little Snake: intersected by the two mile wide corridor and 250'ROW. o Spence Gulch: intersected by the two mile wide corridor and 250'ROW. o West Sevenmile: intersected by the two mile wide corridor and 250'ROW. o Shaffers Draw: intersected by the two mile wide corridor; 250' ROW immediately adjacent. o Sevenmile Draw: intersected by two mile wide corridor; 250' ROW? o Lower Little Snake: intersected by the two mile wide corridor and 250'ROW. o Deep Canyon: intersected by the two mile wide corridor and 250'ROW. o Simsberry Draw: intersected by the two mile wide corridor; 250' ROW? o Sand Creek: intersected by the two mile wide corridor; 250' ROW immediately adjacent o Lone Tree Gulch: intersected by the two mile wide corridor and 250'ROW. - Greater sage-grouse: A significant amount of PPH would be impacted by this route, including a number of lek sites. The route also overlaps with 25-75% regional breeding density areas, see also additional info on segments 186.00 and 180.05 from DEIS below - Visual impacts: The visual resource impacts would be substantial. In addition to impacts to the Cross Mountain WSA and CWP, spectacular LWC units such as Deep Canyon and Simsberry Draw and Upper and Lower Little Snake would be heavily impacted. All of these areas provide high vantage points that can be seen from long distances and are currently largely free of human impact. - Big game: see additional info on segments 186.00 and 180.05 from DEIS below. Additionally, Baseline population data should be provided in order to inform the public, monitor impacts and judge the efficacy of mitigation measures. - Raptors: limited segment info in the DEIs; see additional info on segments 186.00 and 180.05 from DEIS below - Additional info on segments 186.00 and 180.05 (from Little Snake Field Office; DEIS p.4-84): 37 new miles of utility corridor <ul style="list-style-type: none"> o Overlaps with 21,160 acres of critical habitat for elk; 14,588 acres for mule deer; 11,502 acres for pronghorn. o Overlaps 59,681 acres of GRSG PPH o Overlaps 20,401 acres of raptor nest buffer zones 	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1657	- Very high environmental impacts - Transmission line itself would not cross NPS land or the Tuttle easement, but ROW would – would require permits from both NPS and Tuttle Easement- Big game: mule deer- Lands with Wilderness Characteristics: o Twelvemile Mesa: intersected by the two mile wide corridor. o Serious impacts to LWC and Cross Mountain CPW further north along route and corridor.	Thank you for your comment.
The Wilderness Society	164-1659	Our organizations endorse the separate comments of the National Parks Conservation Association (NPCA) regarding the three Tuttle Easement micro-siting adjustments that propose to relocate the ROW along the north edge of the Tuttle property (Option 1), between Tuttle and Dinosaur NM (Option 2) or within Dinosaur NM lands (Option 3). NPCA's commitment to the protection and preservation of lands congressionally and presidentially designated to be managed by the National Park Service, while more narrowly focused than those of the organizations collaborating on these comments, are complementary and value added. In summary, NPCA specifies that (1) Tuttle easement micro-siting option 1 minimizes impacts to Dinosaur National Monument, (2) their opposition to Tuttle Easement Option 2, and (3) their opposition to Tuttle Easement Option 3.	Thank you for your comment.
The Wilderness Society	164-1660	Segment 220.10 (Alternatives II-B and II-C) - Very high environmental impact - Grand Valley Riparian Corridor and Highline State Park IBA is located 7 miles from the 2-mile transmission line corridor in Mesa County, east of the segment. This corridor is of high conservation value. While not directly intersected by the line, birds utilizing this corridor are expected to be impacted. "The site contains much of Colorado's best remaining Rio Grande cottonwood habitat. The IBA provides nesting, wintering, and stopover habitat for approximately 75 percent of the state's bird species. Nearly 300 bird species have been recorded at this IBA, including nearly 70 breeding species and over 70 wintering species." (DEIS p.3.7-30) - Rabbit Valley Recreation Management Area Important Bird Area is located 3 miles from the transmission corridor in Mesa County. The IBA consists of 336 acre Recreation Management Area. It is noted for providing habitat for gray vireos and Scott's orioles.	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate.
The Wilderness Society	164-1661	Segment 210 (Alternative II-A (Applicant-Proposed), II-D, II-E, and II-F (Agency-Preferred)) - Lowest environmental impact of the route options - Raptors: Lack of specific locational data in DEIS, though Figure 3.8-2 shows large number of white-tailed prairie-dog colonies, which form a prey base for raptors. Mitigation measures need to be addressed (see p.3.8-37) - Black-Footed Ferrets: Reintroduction efforts and the creation of a non-essential, population of Black-Footed ferrets (BFF) has been underway for nearly two decades in the Wolf Creek area. While no BFF's have been located in recent years during survey efforts, much of that is due to recent plague outbreaks that have decimated White-tailed prairie dog colonies. However, the potential for successful reintroduction remains, with the prospects of linking BF populations in CO and UT (Coyote Basin) a future reality. This proposed route could have adverse impacts to WTPD populations from depredation, particularly increased depredation from raptors. Therefore perching controls need to be implemented.	Comment noted. Transwest has committed to the construction and operation of the TWE remaining compliant with all applicable federal and state required avoidance and protection measures relevant to the black-footed ferret. Construction practices and required mitigation within the project area is commonly outlined in the terms and conditions of the official USFWS Biological Opinion resulting from Section 7 consultations. In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. No change to text.
The Wilderness Society	164-1667	In comparison, the two-mile corridor for Alternative C "Highway 13 alternative" intersects with nine units—five of which are located beyond the intersection of the three alternatives near Highway 40. Prior to this intersection Alternative C only intersects with three potential LWC units, compared with 15 for the Applicant-proposed and 14 for the Agency-preferred. These numbers differ from those analyzed in the DEIS because: 1) the DEIS did not mention or analyze impacts to the WSA-adjacent units documented by BLM, specifically those around Cross Mountain WSA; and, 2) the DEIS misses/fails to analyze impacts to the Twelvemile Breaks and Upper Little Snake units which were found to contain wilderness characteristics by BLM and which are overlapped by one of more of the analyzed route corridors, or Peck Mesa unit, which is not adjacent to a WSA but was included in BLM's LWC inventory and is bisected by the applicant proposed route; and, 3)the BLM's inventory (performed by AECOM) is flawed in several cases and eliminates units or portions of units that in fact do meet the criteria for LWCs as outlined in BLM's own policies (BLM Manual 6310 and 6320).	The Draft EIS was prepared using information from the BLM's lands with wilderness characteristics inventory that existed when the document was compiled. The wilderness characteristics information in the Final EIS will be updated as needed to reflect BLM's current inventory and any changes that may have occurred since the Draft EIS. Additionally, BLM maintains and approves any wilderness characteristics information pertinent to their jurisdiction and, as such, any comments pertaining to that inventory are beyond the scope of this EIS process. However, this information has been passed along to the BLM field office.
The Wilderness Society	164-1692	BLM must mitigate all impacts to wildlife habitat resulting from the Transwest transmission project. Specifically, no new disturbance should occur within known species populations (i.e., sage-grouse leks, prairie dog towns) and towers should be sited outside of currently occupied habitat.	Comment noted. The BLM is not statutorily required to ensure a no net loss of habitat resulting from its authorized actions. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the TWE ROD.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1697	Alternative Route 225.2 Alternative route 225.2 results in unnecessary and unacceptable impacts to lands proposed for wilderness designation in ARRWA, located within Utah's iconic San Rafael Swell. Specifically, the proposed route alignment cuts into the Lost Spring Wash, Price River and Mexican Mountain proposed wilderness unit boundaries. [See Map UT-4; Map UT-5]. BLM has also identified those same lands impacted by the route within the Lost Spring Wash unit as possessing wilderness characteristics.	Thank you for your comment.
The Wilderness Society	164-1700	Alternative Routes 503, 504 and 505 (Ox Valley West and East Alternative Variations) Alternative routes 503, 504 and 505 result in unacceptable and unnecessary impacts to IRAs and other undisturbed landscapes located within the Dixie National Forest. It bisects a USFS inventoried Unroaded Undeveloped area that is also a citizen proposed Wilderness. Additionally, the topography is exceptionally mountainous and inaccessible. We do not believe this to be a viable alternative due to these concerns. Additionally, this is many miles from any LRMP utility window designation. There is no foreseeable way to further tune or mitigate this alternative's impacts to make it viable as a part of the decision alternative. As noted, these route followed by these alternatives is not an existing road, but rather an old off-road vehicle trail. Additionally, the presence of high-voltage transmission lines increases the risk of wildfire within the area surrounding the transmission infrastructure. By constructing the Transwest line within these remote areas, the risk of uncontrolled wildfire increases.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1705	Alternative routes 500, 500.02 and 502.05 follow the existing West-wide Energy Corridor (WVEC) and therefore, when compared to alternative route 490.05, present the lowest ecological impact alternative in southwestern Utah and eastern Nevada.	Thank you for your comment.
The Wilderness Society	164-1706	Alternative Route 501.1 This segment through the Dixie National Forest has the lowest environmental impact. This alignment would expand an existing designated LRMP utility window and power line corridor. This alignment is the only one of the three on the Dixie that, even after amendment of the LRMP, would also be consistent with the intent outlined in the LRMP's supporting EIS. There is a small Mountain Meadows monument designation. This monument was designated after establishment of this major utility window, after the construction of multiple power and pipelines that area all already within sight of the monument area. There already are chainings, roads, highways and severely degraded public and private lands in the immediate area. This is already a disturbed environment. Adding a new power line in this utility corridor that predates the monument's designation does not add the unacceptably significant and detrimental environmental impacts to the project that would occur with either other of the Utah alignments (505 and 506).	Thank you for your comment.
The Wilderness Society	164-1707	All TWE segments and alternatives in Nevada have significant impacts on desert tortoise, other species and aesthetic resources. To limit these impacts by concentrating them along existing disturbances, the TWE routes should stick to and follow existing corridors. Specifically, the environmental community of Nevada has identified the following route as the route which would have the lowest environmental impacts: 502.05-530-540-590-600-620-630-660-700-720-740-790. If TWE is approved, it should follow this route in Nevada.	Thank you for your comment.
The Wilderness Society	164-1710	II. Potential ground electrode sites in Nevada: All of the proposed ground electrode sites in Nevada would impact moderate to good desert tortoise habitat and should be constructed with the same care as the transmission line through such habitat, including the same mitigation measures. Of the sites proposed, the two Halfway Wash sites would best minimize impacts the best.	Thank you for your input. Additional mitigation measure SSWS-4 has been revised and expanded to include a suite of impact avoidance and minimization measures for desert tortoise. These measures apply to construction and operation of all applicable project facilities, including ground electrode sites.
The Wilderness Society	164-1711	III. Input, concerns and issues with specific segments in Nevada: 502.05 - Lowest environmental impact route of the routes in this region o Follows an existing 345 kV transmission line - This segment follows the West-wide Energy Corridor ("WVEC") alignment for WVEC 39-113. WVEC 39-113 is identified in the WVEC settlement agreement as a Corridor of Concern (COC). - All of this segment in Nevada passes through Mojave desert tortoise Critical Habitat.	Thank you for your comment.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1714	<p>III. Input, concerns and issues with specific segments in Nevada: 520, 610</p> <ul style="list-style-type: none"> - High environmental impact route - The east-west portion currently is not currently a transmission corridor and impacts moderately important sage grouse habitat as mapped by the Nevada Department of Wildlife; - South of the Coyote Springs development, the corridor passes through a population of the Las Vegas buckwheat, a candidate species found to be warranted by precluded for listing under the Endangered Species Act; - Potential impacts to the Meadow Valley speckled dace, red-tailed blazing star bee, Meadow Valley sandwort, and the Needle Mountains milkvetch, all BLM Special Status Species and ranked as imperiled or critically imperiled due to rarity by the Nevada natural Heritage Program. - The north-south segment ties in with the One Nevada existing corridor, and passes through desert tortoise critical habitat. 	Thank you for your comment.
The Wilderness Society	164-1715	<p>III. Input, concerns and issues with specific segments in Nevada:530, 540, 590, 600- Lowest environmental impact route of the routes in the region- These segments follow existing transmission and pass by existing renewable and non-renewable energy producing facilities;- Segments 530 and 540 pass through designated critical habitat for the desert tortoise;- Segments 590 and 600 are in non-critical desert tortoise habitat, a majority of which has been heavily impacted previously;- Segment 530 follows WVEC 39-113, a COC. See notes for segment 502.05 regarding this COC;- Segment 600 follows WVEC 39-231, a COC.- The Toquop Wash area of segment 530 contains a population of the Las Vegas buckwheat, a candidate species found to be warranted by precluded for listing under the Endangered Species Act;- Several species ranked as imperiled or critically imperiled by Nevada Heritage Program are found within the corridor, including: Moapa speckled dace, Moapa White River springfish, Virgin River chub, Moapa River population, sticky buckwheat, Mojave gypsum bee, and the red-tailed blazing star bee.</p>	Thank you for your comment.
The Wilderness Society	164-1716	<p>III. Input, concerns and issues with specific segments in Nevada: 550, 560, 570</p> <ul style="list-style-type: none"> - High environmental impact routes - These segments would pioneer a new and un-needed transmission corridor through moderate to good desert tortoise habitat and historic trails; - Segment 560 follows WVEC 39-113, a COC. See notes for segment 502.05 regarding this COC. - Sticky buckwheat is found within the corridor in the vicinity of the Virgin and Muddy Rivers. 	Thank you for your comment.
The Wilderness Society	164-1717	<p>III. Input, concerns and issues with specific segments in Nevada: 620, 630, 660</p> <ul style="list-style-type: none"> - Lowest environmental impact route of the routes in the region - These segments are in existing transmission right-of-way corridors which are already heavily concentrated and have significant visual impacts and follow existing transmission lines; - These segments follow WVEC 39-231, a COC. See notes for segment 600 regarding this COC; - They pass through low – moderate non-critical desert tortoise habitat; - They impact Mojave gypsum bee and Las Vegas bearpoppy habitat; - Segment 660 passes through the Rainbow Gardens ACEC and Instant Wilderness Study Area; these lands are already heavily impacted by transmission lines, roads and off-road motorized recreational uses. 	Thank you for your comment.
The Wilderness Society	164-1719	<p>III. Input, concerns and issues with specific segments in Nevada: 700, 720, 740, 790</p> <ul style="list-style-type: none"> - Lowest environmental impact route of the routes in the region - These segments pass through highly disturbed and urban areas in corridors already having transmission lines in them; - These segments follow WVEC 39-231, a COC. See notes for segment 600 regarding this COC. 	Thank you for your comment.
TransWest Express LLC	264-1386	TransWest does not have a particular preference for Alternative I-A (Applicant Proposal) or Alternative 1-D (Preferred Alternative) in the Colorado portion of Region I.	Thank you for your comment.
TransWest Express LLC	264-1392	TransWest nonetheless believes that Micro-siting Option 1 is the most desirable route as it is co-located with existing transmission facilities and would impact very little of the Tuttle Easement, as discussed above.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1432	Additionally, Alternative II-A (Applicant Proposal) is the shortest route in Region II and contains the least amount of access road miles necessary to construct and operate the proposed Project. Alternative II-A also contains the fewest acres associated with facility construction and operation disturbance, as well as the vegetation clearing necessary for construction of the right-of-way. DEIS, p. 2-42 -2-43. Portions of the Applicant Proposal corridor have also been identified as preferred in a joint resolution by representatives of Juab and Millard Counties, Utah. Once again, given the express preference of the counties actually impacted by the proposed transmission project, TransWest encourages the BLM to select the Applicant Proposal as compared to the currently identified Preferred Alternative	Thank you for your comment.
TransWest Express LLC	264-1433	The information contained in the DEIS indicates that the Applicant Proposal (Alternative I-A) for Region I significantly minimizes potential impacts to water resources as compared to the agency Preferred Alternative. For example, there are only 210 water body crossings for the Applicant Proposal as compared to 244 for the agency Preferred Alternative. The information in Section 3.4.6.4 also demonstrates that the number of floodplains over 1,000 acres in size impacted by the Project is greater for the agency Preferred Alternative as compared to the Applicant Proposal (Alternative 1-A). The longer route also results in greater use of water for construction activities under the agency Preferred Alternative as compared to the Applicant Proposal. Similarly, the agency Preferred Alternative in Region II will result in increased impacts to water quality because of the greater amount of construction and operation disturbance for the agency preferred route. DEIS p. 3.4-27. More than 500 additional acres will be disturbed under the agency Preferred Alternative, which is 14% more disturbance during construction than Alternative II-A (Applicant Proposal).	Thank you for your comment.
TransWest Express LLC	264-1435	TransWest is concerned that the BLM's Preferred Alternative would actually have a greater impact on federally listed plant species than the Applicant Proposal. The information in Section 3.6.6.4 demonstrates that within Region II, Alternative II-F (Preferred Alternative) has the highest number of known occurrences of federally listed plant species, while the number of federally listed plant species with potential habitat is greatest in Alternative II-D and Alternative II-F (Preferred Alternative). The information in Table 3.6-11 indicates that Alternative II-A (Applicant Proposal) would impact fewer federally listed plant species than either of these alternatives. Thus, the BLM has actually selected the alternative that maximizes potential impacts to listed plant species, as well as BLM sensitive species.	Thank you for your comment.
TransWest Express LLC	264-1436	As described above with respect to other resources, the BLM's Preferred Alternative has more significant impacts on wildlife resources than the Applicant Proposal. In Region I, Table 3.7-23 discloses that Alternative I-A (Applicant Proposal) will have fewer impacts on Colorado pronghorn severe winter range, Wyoming pronghorn crucial winter/yearlong range, Wyoming mule deer crucial winter/yearlong range, Colorado elk severe winter range, upland game bird, small game mammal, furbearer, small nongame mammal, migratory bird and reptile habitat, waterfowl habitat, Powder Rim Important Bird Area and Muddy Creek Wetlands Important Bird Area than would Alternative 1-D (Preferred Alternative). In addition, the collision potential for migratory birds is less under Alternative I-A (Applicant Proposal) than it is under Alternative I-D (Preferred Alternative) and, with respect to non-special status raptor nests, the number of such nests within one mile of the reference line for Alternative 1-D (202) far exceeds the number of such nests within one mile of the Applicant Proposal (60). Even in the few instances where impacts under Alternative 1-A (Applicant Proposal) exceed those under Alternative I-D (Preferred Alternative), the differences are generally not statistically significant. For example, 207 acres of Colorado mule deer severe winter range will be affected during construction and 57 acres during operation under Alternative I-A (Applicant Proposal) vs. 167 acres during construction and 40 acres during operation under Alternative I-D (Preferred Alternative). However, Alternative I-D (Preferred Alternative) has greater indirect impacts on Colorado mule deer severe winter range (22,550 acres) than does the Applicant Proposal (18,366 acres). Similarly, more acres of Colorado elk parturition range are affected under Alternative 1-A (Applicant Proposal) than under Alternative I-D (Preferred Alternative) though, in either case, less than 1% of existing Colorado elk parturition range within the Region I big game analysis area is affected. Similar results are reached when the impact parameters for wildlife under the Applicant Proposal (Alternative I-A) are compared to such impacts under the agency Preferred Alternative in Regions II (Table 3.7-29) and III (Table 3.7-36). The summary of impacts on wildlife simply does not support the identification of the agency Preferred Alternative in Regions I, II or III.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
TransWest Express LLC	264-1438	As the BLM is aware, the United States Fish and Wildlife Service ("FWS") determined that listing the greater sage-grouse under the Endangered Species Act was warranted, but precluded by higher priority listing actions. 75 Fed. Reg. 13910 (Mar. 23, 2010). As a result of the warranted but precluded listing, the BLM has engaged in a national program designed to protect and preserve greater sage-grouse habitat across its range. See Instruction Memorandum 2012-044 (12/27/2011). The BLM has also issued national policies directing each field office to develop and impose interim conservation policies and procedures in order to protect sage-grouse habitat. See Instruction Memorandum 2012-043 (12/27/2011). Given the clear direction from the BLM Washington Office, TransWest is surprised that the BLM's Preferred Alternative would actually have more significant adverse impacts on sage-grouse habitat than would the Applicant Proposal, particularly in the Wyoming portion of Region I.	Thank you for your comment.
TransWest Express LLC	264-1439	TransWest specifically selected its route through Wyoming in order to avoid potential impacts to sage-grouse by complying with Wyoming Executive Order 2011-5 and Wyoming BLM Instruction Memorandum WY-2012-019 (02/15/12). The Applicant Proposal is specifically aligned with the preferred corridor for transmission lines in Wyoming under the Executive Order. DEIS, Figure 3.8.1; Wyoming Executive Order Attachment D. TransWest encourages the BLM to select Alternative I-A (Applicant Proposal) as the most appropriate route from the Northern Terminal to the Colorado state line.	Thank you for your comment.
TransWest Express LLC	264-1440	Based on information that has recently become available in the Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement "Draft NW CO Plan Amendment", portions of the Applicant Proposal (Alternatives I-A and II-A) in Colorado may impact preliminary priority sage-grouse habitat ("PPH") as mapped by the Colorado Division of Parks and Wildlife and endorsed by the BLM in the Draft NW CO Plan Amendment. In particular, it appears Alternative I-A (Applicant Proposal) may cross proposed right-of-way avoidance areas for transmission projects in the Preferred Alternative (Alternative D) under the Draft NW CO Plan Amendment. Given the similarities between Alternative I-A (Applicant Proposal) and Alternative I-D (Preferred Alternative), and in order to best comply with the BLM's proposed management of sage-grouse in northwest Colorado, TransWest encourages the BLM to select Alternative 1-D (Preferred Alternative) for only the portion of the route from the Colorado state line to the border of Moffat and Rio Blanco Counties, Colorado (the end of Region I).	In their selection of the preferred alternative for the TransWest Express project, agency decision-makers reviewed the Draft EIS and considered the alternatives and their relative impacts on resources, as well as corresponding public and agency input. The agency preferred alternative presented in the Final EIS was chosen to meet the agencies' purpose and need and applicant objectives while balancing federal land managers' multiple use mandate. Additional information regarding how criteria were evaluated in choosing the Agency Preferred Alternative has been provided in the Final EIS.
TransWest Express LLC	264-1452	As with many of the other resources described above, the BLM's Preferred Alternative would actually have more significant adverse impacts to visual resources in Regions I, II and III as compared to the Applicant Proposal.	Thank you for your comment.
Trout Unlimited	598-810	The BLM's preferred alternatives for the 4 Regions appear to impact fish, wildlife and sportsman's values and remote backcountry areas more so than the proponent's proposal. This is illustrated in Utah where the transmission line alternatives cross through several IRAs on forest service lands, WSAs and LWCs on BLM lands, and have the potential to significantly and permanently impair sensitive watersheds containing native trout species.	Thank you for your comment.
Trout Unlimited	598-811	Region I: TU generally supports Alternative A.	Thank you for your comment.
Trout Unlimited	598-816	Region III: TU recommends the use of Alternative C through Region III. TU supports most of the route of Alternative A in Region III through Millard and Beaver Counties. At Cedar City, however, Alternative A begins to impact significantly more springs (16) and perennial streams than any of the other alternatives. In addition, Alternative A disturbs more stream acreage (39 acres) than Alternative B (23 acres) or Alternative C (almost 10 acres). Alternative A also crosses through USFS lands (Dixie NF) containing MIS aquatic species while the other two alternatives do not. We recommend alternative variations that provide the least amount of stream disturbance. Accordingly, for this Region, recommends Alternative C.	Thank you for your comment.
Trout Unlimited	598-817	Region IV: TU supports Alternative A. Alternative A avoids crossing through and between important landscapes such as the Delamar Mountains Wilderness Area and proposed additional wilderness areas west of Delamar Mountains. Alternative A is both the Applicants and Agency's preferred route. We support this route.	Thank you for your comment.
U.S. Fish and Wildlife Service	556-1036	Page 3.6-29 to 3.6-30; Section Table 3.6-10 The Service supports the Region I ground electrode system that avoids and minimizes affects to federally listed plant and wildlife species as well as their habitats. Specific to federally listed plant species, this would include the Shell Creek, Little Snake East, Eight Mile Basin, and Separation Creek alternatives.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
U.S. Fish and Wildlife Service	556-1060	Page 3.7-9; Section 3.7.4.3 The Service acknowledges that bird habitat conservation areas will be part of the prioritization process to determine areas for compensatory mitigation for the Project. However, bird habitat conservation areas are only one of several factors to consider.	Thank you for expressing your concerns. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
U.S. Fish and Wildlife Service	556-995	Page 2-40; Section 2.5.1.1 The Service supports Tuttle Easement Micro-siting Options 2 and 3 that avoid affects to the Tuttle Ranch Conservation Easement, which was established to protect high-quality wildlife habitat. Furthermore, we support a micro-siting option that allows for future transmission line projects to follow a parallel corridor also avoiding impacts to the Tuttle Ranch Conservation Easement.	Thank you for your comment.
USDOJ - CUP Completion Act Office	138-255	After examining the EIS, the CUPCA Office is comfortable supporting implementation of the agency preferred alternative as other alternatives presented in the EIS could impact Central Utah Projects.	Thank you for your comment.
Utah Associated Municipal Power Systems	561-1237	A direct effect to UAMPS jointly owned transmission lines to serve its members in southwestern Utah. The Proponent Preferred Alternative has the potential to directly affect our existing Rights of Way and probably negatively impact our existing obligations and future plans in this area; therefore, the UAMPS recommends the BLMs adoption of the Agencies Preferred Alternative in the FEIS.	Your preference for the Agency Preferred Alternative has been noted. Thank you for your comment.
Utah Associated Municipal Power Systems	561-1238	To avoid these probable detrimental effects to the load serving utilities in Washington County, Utah, UAMPS recommends the ELM's adoption of the Agency's Preferred Alternative as the Agency's Preferred Alternative in the Final Environmental Impact Statement. Selecting the Agency's Preferred Alternative seems to achieves the purpose and need of the proposed project while also meeting both the ELM and the United States Forest Services' ("USFS") obligations under the Federal Land Management Policy Act ("FLPMA") and Energy Policy Act of 2005 ("EPAct").	Thank you for your comment.
Utah Associated Municipal Power Systems	561-1240	Similarly, the Agency's Preferred Alternative is consistent with the ELM and USFS's obligations under FLPMA. FLPMA directs the ELM and USFS to manage public lands under the principles of multiple use and sustained yield, in accordance with developed land plans. 42 U.S.C. § 1732(a). As mentioned above, the proposed Agency's Preferred Alternative is consistent with the existing land management plans and accompanying amendments. Additionally, the Agency's Preferred Alternative minimizes adverse impacts to cultural resources. /d.§ 1732(d)(2)(A). Lastly, the Agency's Preferred Alternative avoids Inventoried Roadless Areas (IRAs) to the greatest extent possible while preserving the Mountain Meadows National Historical site view-shed.	Thank you for your comment.
Venuti,	258-466	Of all the applicant proposed route seems the most logical with the least impact to surrounding communities and should be the chosen one. But I think after further consideration you will see why the Rio Blanco/Garfield County option falls short of the high standards this project holds.	Thank you for your comment.
Vickrey, Kristy	395-592	I do not want the power lines running that close to the Avintaquin campground, and do not want the power lines running along Reservation Ridge Road because it is a designated scenic area and so beautiful the way it is now.	Thank you for your comment.
Vogt, Tim	454-531	My second concern is that the construction of the power line is going to change the vicinity of that private land in an irreparable manner. The road construction and the access that will follow will completely destroy the near wilderness characteristics that exist today.	Thank you for your comment.
Vogt, Tim	607-842	The agency preferred alternative is not an acceptable location for a powerline. The portion of the agency preferred alternative that goes through Mud springs wash, section 510 as referenced in the DEIS, is planned to go through near-pristine country that will forever be altered and scarred by this and perhaps/probably additional powerline(s).	Thank you for your comment.
Wagstaff, Neil	457-535	I am -- and all four of us are totally opposed to it. I'm actually opposed to the line 2F, I think it is, up on Reservation Ridge Road. They need to move it down into the valley to the south.	Thank you for your comment.
Weber, C.	159-152	I am very concerned by the BLM's choice of Alternative Route I-D and even more disturbed by the recent BLM press release regarding Gateway South which states the preferred route would be in the same area as the TWE Agency Preferred Route. • This is very troubling as the impacts to the land and communities under Alternative I-D are significantly higher: o Draft EIS Table 2-5 says that Alternative I-A is 155 miles long with 227 miles of associated access roads. • The BLM Agency Preferred Alternative Route I-D is 171 miles long with 242 miles of associated access roads. o Table 2-6 says that Alt I-A has 2,057 acres of total disturbance, 512 of which attributed to access roads. • Alt I-D has a total of 2,306 acres of disturbance, 515 of which attributed to access roads.	Thank you for your comment.
Weber, C.	159-153	In addition to the DEIS data not supporting Alternative I-D, there is no seeming rhyme or reason as it does not follow any designated above-ground energy corridors, as outlined by the West Wide Energy Corridor PEIS.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Weber, C.	159-154	For all of this, I respectfully ask that you rethink the alternatives and utilize Alternative I-A for the final.	Thank you for your comment.
Wells, Helen	465-491	They want to put the power line too close to residential area where there's already four lines going through. So if they would use the alternate one on the other side through Boulder City, around the lake where there's less residential influence.	Thank you for your comment.
Western Resource Advocates	565-1253	Given our current knowledge, if TWE is approved, it should follow these route segments. - Wyoming segments: 20; 30; 40; 110.00; 115.00 or 110.05 and; 150.05; 140.00; 115140.05 or 140; 190.00 - Colorado segments: 190.00; Option 1 at Tuttle Micro-Siting; 100; 101.10; 101.20; 101.30 - Utah segments: (this summary was not available at the time of this writing. Please refer to the UT state comments in the appendix of the comments by The Wilderness Society, Audubon Rockies and partners – 9-30-13) - Nevada segments: 502.05; 530; 540; 590; 600; 620; 630; 660; 700; 720; 740; 79	Thank you for your comment.
Western Resource Advocates	565-1260	Therefore, we remain concerned that the TWE transmission line will cause significant adverse impacts to GRSG if improperly sited. Our organizations recognize that careful planning and siting for TWE will not only benefit directly impacted populations of grouse but also be helpful in minimizing impacts from other proposed high voltage transmission lines. Avoiding impacts during siting will require a great deal of geospatial data on the locations of the protected and sensitive lands and species. The quality and availability of these data will vary considerably across the extent of the proposed TWE project. Some regional and state-based data sets will assist with this fine-scaled siting work but many of those are mostly focused on public lands or are incomplete. The absence of data from private lands does not necessarily indicate the absence of sensitive resources.	Comment noted. The applicant welcomes the opportunity to review and potentially utilize data provided by agencies and conservation NGOs throughout the NEPA process. The applicant anticipates continued coordination with the USFWS and cooperating agencies in ensuring effective conservation of resources throughout construction and operation of the project. Geospatial data utilized regarding designated PPH/PGH, occupied, brood rearing, and winter sensitive habitats includes both public and private lands.
Western Resource Advocates	565-1278	The TWE DEIS repeatedly notes that raptors will be among the most impacted species. We must, however, also keep mind how these magnificent birds and their prey base will be seriously compromised by the impacts of climate change. Consequently, as with GRSG and other resources, it is a delicate balancing act between generating and transmitting renewable energy as with this project, which are solutions for addressing climate change, and minimizing impacts from that development.	Thank you for your comment.
Western Resource Advocates	565-1287	Mitigation protections will require additional and ongoing monitoring to determine effectiveness, especially given the unique nature of transmission impacts (linear and tall, direct and indirect) and the evolving science addressing these projects. There is an important distinction, however, between the monitoring required to assess effectiveness of mitigation, and research or monitoring completed in lieu of on-the-ground mitigation. We do not support research funding as a substitute for compensatory habitat mitigation applied on the ground.	Comment noted. Per 40 CFR 1505.2, the Record of Decision (ROD) must mandate a monitoring and enforcement program for any mitigation that is adopted and either summarize these requirements in sufficient detail to constitute an enforceable commitment, or incorporate by reference the portions of the EIS that do so (see Question 34c, CEQ, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, March 23, 1981).
Winder, Travis	467-502	The shelf area I'm talking about is down along Emma Park Road which he told me -- I would prefer it to be Emma Park Variation or at 2E flat. Down there they have more of the oil fields. It's more of a flat, shelfy area, and it's already -- there's more of an industrial field down there versus the top.	Thank you for your comment.
Wyoming Business Council	462-476	The TWE Project provides a vital connection between Wyoming energy resources and the markets/customers for those resources. It benefits our state and the nation as a whole, seeking to be even more energy independent, to have this line in service as soon as possible. Since this is a federally designated "Rapid Response Team for Transmission" project, and considering you have already completed almost five years of environmental analysis, we hope the Final EIS and Record of Decision may be issued with the year.	Thank you for your comment.
Wyoming Business Council	462-476	The TWE Project provides a vital connection between Wyoming energy resources and the markets/customers for those resources. It benefits our state and the nation as a whole, seeking to be even more energy independent, to have this line in service as soon as possible. Since this is a federally designated "Rapid Response Team for Transmission" project, and considering you have already completed almost five years of environmental analysis, we hope the Final EIS and Record of Decision may be issued with the year.	Thank you for your comment.
Wyoming Game and Fish Department	176-244	We continue to support our state defined route for this project as we believe it will best minimize conflicts with affected wildlife species.	Thank you for your comment.
Wyoming Infrastructure Authority	466-497	Finally, we support the State of Wyoming's preference for the TWE Project to follow the shorter, less-intrusive Alternative I-A route through Wyoming, as demonstrated in the Draft EIS analysis, this route has the fewest miles, the least acreage of disturbance, and the least miles of visual impacts both on cultural/historical trails and on modern trails through the area today, such as Highway 789 to Baggs.	Thank you for your comment.

Table L-2 Response to Opinion Only Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Wyoming Office of State Land & Investment	174-238	Upon assessment of each proposed alternative, OSLI prefers Alternative 1-D. This alternative will likely result in the fewest negative impacts to state trust lands. This alternative proposes an estimated direct encumbrance of 43 acres on state trust land, and associated impacts of 1,280 acres of surface estate and 3,800 acres of mineral estate.	Thank you for your comment.
Wyoming Office of State Land & Investment	174-239	Of the remaining alternatives, Alternative 1-A is acceptable but not ideal. While this alternative traverses a more direct alignment, it does encumber approximately 20 additional acres of trust lands, totaling an estimated 65 acres of direct encumbrance, and otherwise impacts 1,280 acres of surface estate and 3,800 acres of mineral estate.	Thank you for your comment.
Wyoming Office of State Land & Investment	174-240	OSLI cannot support Alternatives 1-B or 1-C because the additional encumbrances that would be required on state trust land.	Thank you for your comment.

Table L-3 Response to Out of Scope Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
American Wind Energy Assoc.	695-1914	The currently installed capacity of wind energy in the U.S. avoids the consumption of 37.7 billion gallons of water annually that would otherwise be used for electric generation, equivalent to roughly 120 gallons per capita in the U.S., or 285.9 billion bottles of water.	Thank you for your comment. The relative merits of wind power or the resource savings of the current wind energy base are outside the decision-making scope, and therefore the analysis scope of this project (See Sections 1.1.1.1 and 1.1.2.1 of the Draft EIS).
Bailey, Laura, Kevin, and Rex	406-736	The agreements that is done by previous power companies has not been abided by. They haven't done the weed control like they were asked to. They left debris on the property. They cut fences, took out gates, broke posts, never replaced or repaired anything during the process, and this is a continual every-year thing that I have to deal with the existing power companies.	While the BLM is required to monitor construction and operation activities on federal lands and ensure that requirements of the NEPA, NHPA, ESA, CWA, and other applicable laws regarding surface resources are upheld on private lands, it does not have the jurisdiction or ability to monitor day-to-day operational activities on private lands. These issues should be addressed with the power companies directly as consistent with the existing easement agreements that apply to those lands.
Baker, Catherine	191-702	If human remains are uncovered, there will be the expense of DNA studies and time lost on the construction project. While some of our families have DNA studies stored online, others do not. We would expect TransWest would want to cover the expense of studies for any human remains to match to living family members.	Thank you for your comment. Any human remains found during construction will be handled in accordance with the Programmatic Agreement developed specifically for this project.
Barker, Candy	407-600	The problem is the topographical map that they have that I've got on and seen is outdated by at least five years because it shows that she still owns the property I bought from her by boundary lines. I went to the recorder and they told me I don't own that, they do. That's probably why she got a letter saying they were looking at her property and it's not really her property; it's mine.	The EIS considers the best available information and correcting property records is out of the scope of this analysis. As the applicant works towards easement acquisition, the owners will be contacted according to the records of the relevant county recorders and assessors.
City of Boulder City	615-965	Finally, the has an acute interest in knowing whether the transmission line would still be built if the power producer was unable to secure a power purchase agreement. Conflicting answers to this question have been received by the City when this inquiry was made to representatives of Trans West and the Western Area Power Administration indicated that the line would not be constructed. The City would like to see this issue addressed in the context of the final EIS for this project.	TransWest has proposed the transmission line to deliver energy generated in Wyoming to the southwest at Marketplace Hub near Las Vegas, Nevada (See Section 1.0 of the Draft EIS). The lead agencies' purpose and need is guided by the Energy Policy Act of 2005, which recognizes the need to improve domestic energy production, develop renewable energy resources, and enhance infrastructure for collection and distribution of those resources, as well as FLPMA (See Section 1.1 of the Draft EIS). This need has been documented through requirements of the Energy Policy Act; by submitting this proposal to the BLM and through agreements, TransWest has indicated their commitment to the Project. Concerns regarding whether the Project would actually be built or not are based on speculation and are therefore outside of the scope of the analysis of this EIS. Western's decision to be made based on the EIS is described in Section 1.1.2.1 of the Draft EIS.
Davis, Charlotte	419-616	Just above us at approximately 96-foot elevation there are two transmission communication towers that provide cell phone coverage for this area, Duchesne County. I'm not going say Duchesne, but I think so, but it does provide cell coverage or communication coverage for the area. There's also AT&T that has a communication tower there. This gentleman just gave me some information to read about interference on this line and said that it's a DC line, probably a 500 kilovolt DC line, but it's a 345 KV AC line, and it collapses and grows as it comes across the line. There will definitely be interference for communication. Anytime you have transmission line that close to a cabin or facility or something like that, I'm sure it's going have some type of interference for any type of electronics you have in your home. So I do have a concern about this particular one.	Information has been passed along to the applicant for their consideration in future transmission line siting.
Defenders of Wildlife	559-1608	The BLM initiated a National Greater Sage-Grouse Planning Strategy to improve sage-grouse management on an estimated 47 million acres of sagebrush steppe under BLM control. That national effort includes amending dozens of Resource Management Plans (RMPs) to incorporate policies and provisions designed to restore the species and protect its diminishing sagebrush steppe habitat. This unprecedented planning process, properly executed, could finally reverse declining Greater Sage-grouse populations, while providing for sustainable use of public lands. However, we are very concerned that, despite the promise of the planning effort, the goals of the process have been compromised by a lack of coordination and miscommunication within and between agencies, as well as the unwillingness of agencies to propose the range of land use restrictions necessary to conserve sage-grouse.	Comment noted. Although the TWE EIS is considering a full range of alternatives to ensure consistency with the decisions resulting from the on-going sage grouse planning efforts, it is outside of the scope of the TWE EIS process to direct how the sage grouse planning process is conducted.

Table L-3 Response to Out of Scope Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Defenders of Wildlife	559-1613	Our concerns about the two processes were elevated after an initial review of the draft Northwest Colorado Greater Sage-grouse Resource Management Plan Amendment/Environmental Impact Statement (NW CO Draft GRSG RMP/EIS), covering 1.6 million acres in northwest Colorado that includes sage-grouse protections. Review of the NW CO Draft GRSG RMP/EIS identifies all three action alternatives as having different approaches to ROW management. Alternative D is also the only alternative that specifically addresses large transmission lines (greater than 230 kilovolts), which brings into question whether the BLM has presented a reasonable range of alternatives and the appearance of pre-decisional information in habitat that is of critical importance to the long-term management of greater sage-grouse. For large transmission lines, such as TWE, Alternative D (see figure 2-8, page B-14 in NW CO Draft GRSG RMP/EIS) has PPH as exclusion areas except for the 68,000 acres managed as an avoidance area. This avoidance area follows the same approximate route identified as the BLM-preferred alternative (D) for TWE, as shown by the yellow shaded areas in Map 1 (attached). We submit that the distinction between transmission avoidance and exclusion areas should be based completely on biological criteria and habitat value rather than on the perceived need to expedite development. These habitat classifications are intended to be a safeguard to conserve habitat and population viability for a candidate ESA species; they should not be used as a means to prioritize development areas. The BLM should not allow waiver, exemption or modification to restrictions on surface occupancy in priority habitat.	Information regarding the concurrent planning processes is provided in Appendix G of the FEIS. The lead agencies' have been coordinating with their counterparts on the on-going sage grouse planning efforts. The Final EIS analyzes a full range of alternatives to ensure the lead agencies' are able to make a decision that is consistent with potential sage grouse planning decisions. Please note that decisions regarding alternatives in the on-going sage grouse planning efforts are outside of the scope of the TransWest EIS.
Defenders of Wildlife	559-1625	Defenders believes the overall goal of mitigation associated with development of any kind should be to enhance overall ecological values within a region, including, but not limited to the recovery of endangered species. If the project is approved, the BLM should establish through the EIS the mitigation goal of a net gain in conservation benefits for endangered, threatened or candidate plants and animal species affected by transmission line development compared with their status before the line. This will help recover listed species and hopefully preclude the need to federally list candidate or sensitive species.	The BLM is not statutorily required to ensure a no net loss of habitat resulting from its authorized actions. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The lead agencies will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the TWE ROD.
Defenders of Wildlife	559-1630	The DEIS mentions identifying Important Bird Areas and Bird Habitat Conservation Areas in the vicinity of the project as well as FWS Birds of Conservation Concern and Partners in Flight Priority Bird Species. These are all important steps that we fully support. However, these datasets must be incorporated with other biologically relevant data into a prospective, comprehensive analysis that effectively identifies high-risk areas for collision and electrocution, defines approaches needed to reduce this risk, and proactively reduces perching opportunities for synanthropic predators that negatively impact sage-grouse and desert tortoise. The APP should be continually evaluated and refined as monitoring data and new innovations become available, and, like the initial APP, any changes should be subject to public review. The Eagle Conservation Plan should include a listing of risk factors, as noted in the USFWS' Draft Golden Eagle Conservation Plan Guidance, and a discussion of these factors for the this project.	Given the spacing between conductors associated with an ultra-high voltage transmission line such as that proposed, there is little or no electrocution risk associated with the transmission line itself. The potential for electrocution exists for substations and the distribution lines connecting ground electrode beds with the transmission line but substations have no habitat value and the electrode beds are expected to be energized on average approximately 30 hrs a year, so the likelihood of electrocution from these facilities is very low. There would be some collision risk associated with the transmission line, particularly the overhead static wire and guy wires on guyed towers. Potential mitigation measures including placement of bird diverters on the static wire and conductors where the line crosses wetland and riparian habitats and on guy wires would reduce collision risk and are being considered. The Draft EIS included the use of perch discouragers as mitigation in sage-grouse habitat. This measure has been added to mitigation in desert tortoise habitat as well. Beyond the impact analysis and avoidance and minimization measures presented in the EIS, TransWest will develop an APP for the project that will identify risk factors to raptors and other migratory birds and list appropriate avoidance, minimization, and mitigation measures designed to eliminate or reduce these risks. APP's typically include monitoring requirements and are considered living documents that are updated based on monitoring data and the advent of new technologies that reduce avian impacts from power lines. The TWE project would entail minimal risk to eagles, thus preparation of an eagle conservation plan is not being considered at this time.

Table L-3 Response to Out of Scope Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Grover, Frank	429-640	So I think that the company -- the sponsor of the project should think of doing things outside the project for adjacent residents. Juab County has a priority of about 20 projects they don't have enough money to complete, so this project is going to generate between 250,000 and \$300,000 in property tax that comes to Juab County, but that's not enough to really make any substantial improvements that will benefit residents in the county or Nephi. And one of the things that will benefit future generations would be to turn a swimming pool into a year-round facility and then certain trail projects could be developed. Anyhow, the county does have a list that could be referred to, and I think it beneficial to go ahead and consider these kind of projects, not all of them, but look at things that can benefit residents of Juab County because as it is now they will get that tax money, but that's not enough to really do anything very significant. I'm looking at the history that the two projects that we have. Pacific Power is paying about \$500,000 -- well, they are paying \$2.5 million, but the county only gets about \$500,000 of it. So just using that in comparison, doesn't look like it will be -- this is -- I haven't seen something like this, but that's helpful. But even so, that's not enough money that Juab County would jump up and start trying to spend it because when you consider cost of living increases and things like that, which I'm sure are built into this thing in terms of today's dollars, it's probably not that much. This would be five, seven years out from today? Right? These estimates. I think it's important that the company does more than nont a project. They need to think of oscial benefits that come enhance people's thinking about the particular project. Oil and gas industry is very agreeable to doing things that help local people, communities, and things like that when they want to do some exploration work. They improve a road. They'll build a trailhead, create a bowling alley in a town or, you know, whatever it needs to make things flow easier. Then here several years ago when IPP out by Delta came in, and the mayor of Nephi went to IPP and said, "Look, you're putting a demand on the city of Nephi for a sewer system, and Nephi is not prepared to handle that. We need some help from you." Well, IPP came up half million dollars or something like that to improve the sewer system in Nephi. So there's precedent for this kind of thing. I'd like to get it up front by making the company aware of what some people here in Nephi think. This doesn't fit in with NEPA necessarily, but I think it's something that the company should be considering.	Thank you for your comment regarding infrastructure needs in Juab County and the roles that new development can play in meeting those needs. As noted in the comment, tax revenues associated with this project would first begin to accrue with the onset of construction and then continue over the life of the project. Your comment has been carefully considered by the BLM but has not resulted in changes to the analyses presented in the FEIS.
Lincoln County Nevada Commissioner	139-120	tax abatements are not granted as this is detrimental to our local government funding in Lincoln County, Nevada.	Thank you for your comment regarding Lincoln County's policy with respect to tax abatements. This information was communicated to the applicant.
Lincoln County Water District	649-937	Alternative III-B would require 212 acre-feet of water. The District owns and has wells available along the proposed corridor that could supply water through the Tule Desert and potentially in the Clover Basin.	Thank you for your comment. In the event that an alternative through the Tule Desert or Clover Basin is selected and permitted, this comment has been relayed to the applicant for their consideration.
Moffat County Colorado Nat Resources Dept	163-441	Page 3.4Potential water reservoirs have been mapped from the Co. River District Small Reservoir Study. Knowing these locations will avoid conflict with potential reservoirs and power line locations.	The Yampa Basin Small Reservoir Study's Phase I and Phase II reports were obtained from the CRWCD, entered into the Project record, and reviewed as part of the Draft EIS analysis. The potential reservoir sites contained within are speculative projects at this time, and it appears no additional analyses has been performed as part of these reports since August 2000. Specific proposals for reservoir construction currently pending before jurisdictional agencies would constitute a reasonably foreseeable future action that would be analyzed as part of this NEPA process. However, none of these reservoir sites fall under that category.
Moffat County Colorado Nat Resources Dept	163-447	Page 3.8-12, Line 18The ExPA designation and the local ferret management plan prevent managing prairie dog populations from being used as a rationale for preserving prairie dog habitat. Moffat requests this EIS not use the ferret as a justification to manage its obligatory species (prairie dogs).	Thank you for your comment; however, it appears to be out of the scope of the EIS. The TWE EIS analyzes impacts to special status species primarily by evaluating impacts to their habitats. Prairie dog towns are a necessary component of black-footed ferret habitat. Whereas the TransWest Express project may attempt to minimize predation on prairie dogs as a conservation measure for black-footed ferret, it is outside of the scope of the document to manage prairie dogs per se.
Morrison, David	612-920	I think the Final EIS socioeconomic impacts section needs to reflect the fact that every day that you delay in issuing a permit to construct means a delay in creating jobs for people who need them, a delay in improving the power grid we all rely on every day, and a delay in getting more wind energy up and running to replace some of the fossil fuel power being used today.	The potential socioeconomic effects associated with the time to complete the NEPA process is beyond the scope of the assessment. No changes in the text resulted from this comment.
Morrison, David	612-921	Without more renewable energy transmission lines, we cant build more renewable energy generation plants. If more wind farms can get installed in Wyoming, they will be buying more wind turbines from Vestas, which will help Colorado and our economic recovery too, and that positive impact should be included in the Final EIS too.	Your support for renewable energy transmission projects is noted. However, whether or not any additional wind farms built in Wyoming will purchase wind turbines from Vestas is speculative at the time. Accordingly, it is outside of the scope of the EIS analysis.
Rasmussen, Dale	606-862	We feel that TransWest Express Transmission project should suggest to the Ute Indian Tribe that if the project crosses tribal land and the Ute Tribe in the future does a solar power generating project of their own, on their lands, that TransWest would allow the Tribe to sell their solar power with TransWest lines for allowing TransWest to go across Tribal land.	The easement negotiations between TransWest or Western and landowners (including tribes) could include compensation for loss of use during construction, loss of nonrenewable or other resources, and the restoration of unavoidable damage to property during construction. Additionally, landowners may also negotiate stipulations to address resource impacts as part of their agreements with TransWest or Western. However, any agreements between TransWest and the Ute Indian Tribe regarding future energy development are beyond the scope of the lead agencies' decisions for this project.
Red Rock Audubon Society	578-913	If construction of this line means that additional coal fired or gas fired power plants will be built so that the TransWest Express line can be a source of continuous, dependable, base load power this information needs to be known and be made public.	The TransWest Express project is not linked to or dependent upon the construction of any additional coal- or gas-fired power plants.

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Commenter Name	Comment ID	Extracted Comment	Response
Ritter, Lindsay	585-873	The renewables industry is growing in the West, and the manufacturing of wind-turbines and turbine parts is an important source of jobs and economic development in Colorado. This is true even with recent layoffs due to uncertainty about the Wind Production Tax Credit. Turbine manufacturer Vestas has plants in Windsor, Brighton and Pueblo. These plants produce blades, towers and other parts. Other businesses supporting the wind-generation industry also employ many local residents. Vestas estimates it has created as many as 1,000 jobs in Colorado. The way I see it, if more wind farms are built in the West, including in Wyoming, there will be more demand for generating equipment made in Colorado. That means more income for companies like Vestas, leading to more tax revenue and job growth.	Thank you for your comment regarding the potential indirect economic linkages between the proposed TransWest transmission line and wind turbine manufacturers and other related industries. Such linkages, while important are beyond the scope of this EIS. Your comment has been carefully considered by the BLM, but has not resulted in changes to the analyses presented in the FEIS.
The Wilderness Society	164-1468	BLM and Western (the Agencies) should include information on likely sources of power that might run on the line. Every effort should be made to place an emphasis on providing capacity for renewable energy sources. It is our understanding that TWE is currently proposed as an DC line because of current market requirements in California for out-of-state generators. These market requirements and conditions could change by the time TWE is contracted to a load-serving entity.	Section 1.0 of the Draft EIS identifies that potential sources include renewable and non-renewable sources in south-central Wyoming. Section 1.1.2 of the Draft EIS indicates that Western's authority to borrow funds is based on the requirement that the Project have one terminus in Western's marketing area and deliver or facilitate the delivery of power from renewable resources (although that does not preclude it from transmitting power from non-renewable sources as well). Identifying the specific sources is speculative at this time. Additionally, it is outside the scope of the lead agencies' decision, and therefore, outside the scope of analysis for this EIS (See Sections 1.1.1.1 and 1.1.2.1 of the Draft EIS).
The Wilderness Society	164-1469	Since TWE was initially proposed, numerous coal retirements have been announced throughout the region (4). These retirements will create transmission capacity on existing lines. It is possible that this new capacity could change the needs which TWE is proposed to serve. We encourage the Agencies to analyze the impact which projected coal retirements throughout the region will have on transmission needs. (4) Since 2005, actual and announced coal retirements in Wyoming, Colorado, Utah, Nevada and California include: - California: ACE Cogen (108 MW), Mt Poso Cogen (62 MW), Port of Stockton (54 MW), Stockton Cogen (60 MW) - Colorado: Arapahoe Boilers 3&4 (158 MW), Cameo Boilers 1&2 (75 MW), Cherokee (802 MW), Trinidad (4 MW), Valmont Boiler 5 (192 MW), WN Clark Boilers 1&2 (44 MW); - Nevada: Reid Gardner (553 MW), NV: Mohave (1,636 MW); North Valmy (522 MW), TS Power Plant 227.5 MW); - Utah: Carbon (189 MW), Kennecott (100 MW), IPP - convert to gas (1800 MW); - Wyoming: Naughton Boiler 3 (326 MW), Neil Simpson Boiler 5 (22 MW), Osage Boilers 1-3 (36 MW)	Thank you for your comment. The proposed action is not a BLM- or Western-generated action. TransWest submitted a request to the BLM for a ROW across public lands in order to build a transmission line. As stated in Chapter 1 of the Draft EIS, the BLM's purpose and need is to consider the ROW application in accordance with 43 CFR Part 2800. The EIS process discloses the environmental effects of granting that ROW, including an analysis of alternatives to the proposed route across federal lands. However, it is beyond the scope of the lead agencies' decision to be made, and therefore, this EIS analysis, to identify potential sources of this energy.
The Wilderness Society	164-1470	In this rapidly-changing energy market, exact assessments about the clean energy merits of a proposed transmission project are not possible. However, the DEIS could do much more to incorporate readily available information to create a more credible picture of the demand for renewable energy resources, how available transmission capacity constrains their development, and the degree to which TWE is a viable solution to this issue in the context of region-specific infrastructure policy and market factors. Recommendation: To provide increased confidence that the line will principally carry renewable energy, TransWest and the Agencies should provide continuous, transparent updates on potential subscribers to the line and explicit statements of generation intent for the line in a manner that does not violate the FERC open access rules. This suggestion was adopted quickly by developers of the Gateway West line who are now posting updated subscriber information online.(5 The FEIS should provide greater information on regional energy planning and policy, coal retirements in the region, and the ways in which TWE complements these policies.	TransWest and Western are required to follow all applicable FERC regulations in the construction and operation of the proposed transmission line. Please note that Chapter 1 of the Draft EIS indicates that, even though renewable energy sources are the likely source for power transmitted by the Project, non-renewable energy could also be a source for transmission.
The Wilderness Society	164-1503	Before a rigorous discussion of mitigation can take place, however, the complete extent of the potential impacts must be carefully assessed. This assessment must include for each endangered and threatened species – and should include for all candidate species – science-based estimates of the direct, indirect, and cumulative impacts throughout the length of the proposed line, and how the cumulative impact of the entire line adds to the other ongoing and reasonably foreseeable impacts throughout the ranges of the targeted species. Ecosystem-level planning and strategies should be employed in addition to species-specific analyses. An assessment tool or evaluation strategy approved by USFWS should be used to quantify the interim and permanent impacts (injury) to habitats (direct, indirect, and cumulative as outlined above) and the ecological services provided by those habitats. This will enable a more accurate and predictive approach to mitigating impacts across the entire line.	Direct, indirect, and cumulative impacts to threatened, endangered, candidate, and proposed species are analyzed in detail in Section 3.8.6 of the Final EIS and are being further analyzed in the biological assessment. The EIS contains numerous BMPs, applicant-committed environmental protection measures and design features, land use stipulations, and proposed mitigation measures designed to avoid and minimize impacts to a variety of biological, physical, and human resources. The lead agencies will determine whether compensatory mitigation is necessary for any resource and, if so, will establish resource-specific guidelines for application and enforcement of these measures in the ROD.

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Commenter Name	Comment ID	Extracted Comment	Response
The Wilderness Society	164-1541	The current protections proposed for adoption includes NSO stipulations as a means of protection for grouse. However, NSOs are subject to exceptions, waivers and modifications. If these can be applied to NSOs, this fails to meet the regulatory certainty being sought by USFWS, which is extremely concerning given the importance of this habitat to grouse persistence in the planning area. If waivers, exemptions and modification are allowed then the BLM should set up a process that allows the public to comment when these actions are considered.	Comment noted. Consideration of waivers and exceptions to BLM RMP stipulations is not within the scope of the TWE analysis. While statements of opinion do not require specific responses or text revisions under the NEPA regulations, they will be considered by the BLM and documented in the administrative record associated with this EIS.
The Wilderness Society	164-1548	Identification of appropriate sites for off-site mitigation for GRS is critical. This species has an unprecedented amount of data that has been examined in recent years, which can serve as valuable tools in identifying and prioritizing potential locations. A comprehensive spatial analysis is needed to determine either (1) those areas where a critical habitat component is missing or (2) those areas that support large populations of sage-grouse and are at high risk for wildfire, invasion of cheatgrass, or other threats.	Comment noted. Comprehensive review of compensatory mitigation opportunities for greater sage-grouse will be determined during the HEA process as discussed on page 3.8-60 of the TWE DEIS. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the Final EIS.
The Wilderness Society	164-1549	The benefits for off-site mitigation should not only be considered for an individual species. Although this is paramount when considering methods to off-set direct impacts to a specific species, but to other species and Lands with Wilderness Characteristics, as opportunities arise. Bird Habitat Conservation Areas have been identified by state partners as places where the "best opportunity exists for effective conservation activities" (DEIS 3.7-9). These have even been grouped into three categories of priority, which are broadly defined but not illustrated within the DEIS. As these are specified as being prioritized as areas for potential compensatory mitigation within the TWE Avian Protection Plan, more information is needed on the prioritization of the three habitat categories.	Comment noted. Comprehensive review of compensatory mitigation opportunities within BHCAs is not within the scope of the TWE FEIS. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The lead agencies will determine if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the TWE ROD.
The Wilderness Society	164-1551	As with APPs, we request clarification on opportunities for public comment and engagement on the content of the CCAs/CCAAs.	Comment noted. The CCA/CAA process requires separate NEPA analysis and public comment, typically in the form of a Categorical Exclusion or Environmental Assessment. Opportunity for public comment on this process would be provided in Federal Register NOA announcements related to the that process and is out of scope of the TWE FEIS.
The Wilderness Society	164-1556	The DEIS presents wildlife impacts by alternative route (see Table 2-23) rather than segments. This level of information aggregates impacts at too coarse of a spatial scale to allow reviewers to understand and evaluate the level of impact across the individual segments. Given this, the manner in which wildlife impacts are presented in the DEIS minimizes the ability of reviewers to provide feedback or guidance on unique routing combinations, severely minimizing the value of public engagement. This information was presented for selected segments, specifically the alternative connectors (see below). Our organizations strongly encourage this information be made available for all segments in the FEIS, to improve selection of a route with the least amount of resource impacts.	The TWE DEIS provides analysis at the alternative level to provide clear disclosure and comparison of alternative impacts. Analysis at the segment level does not provide a comparison of the relative impacts of each complete alternative. To address your concern, the disturbance impacts by segment was provided in an appendix to the Final EIS.
The Wilderness Society	164-1566	Segment 120 (Alternative A) Request clarification and specific analysis from BLM on potential raptor impacts - Highest environmental impact – unfragmented, low level of existing disturbances - Very concerned about southern end of this segment. While northern end is overlapped by CD-C gas field (8,950 wells), just south of Mexican Flats the segment traverses rugged terrain that is currently not developed (DEIS Figure 3.2-5). Anticipated impacts include habitat fragmentation through undeveloped landscape, substantial visual impacts, soil erosion, and potential for raptor conflicts.	Comment noted. The TWE DEIS provides analysis at the Alternative level according to Lead agency direction. Analysis at the segment level is not within the scope of the project. Site specific impacts will be determined at the Plan of Development stage of the project, post Record of Decision.
The Wilderness Society	164-1664	The two-mile corridor analyzed for the applicant proposed route from the Wyoming border to the Utah border overlaps with 20 potential LWC units. BLM found and documented wilderness characteristics in 14 of these units, did not find wilderness characteristics in two, and has not inventoried the four units listed in the draft LWC inventory as being adjacent to Wilderness Study Areas.	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM. The lands with wilderness characteristics inventory provided by the BLM for each field office was used as the baseline information in the lands with wilderness characteristics analysis for the TransWest EIS. Baseline information has been updated, as applicable, for the Final EIS.
The Wilderness Society	164-1665	The corridor for the agency-preferred route from WY to UT intersects with 19 potential LWC units. BLM found and documented wilderness characteristics in 13 of these units, did not find wilderness characteristics in three units, and has yet to inventory the two WSA-adjacent units overlapping with the agency-preferred corridor. Additionally, the BLM seems to have found wilderness characteristics in the Upper Little Snake unit, however the inventory for this unit is not included in the BLM's inventory (a duplicate of the Lower Little Snake inventory is included instead).	Inventories, designations, and determinations for areas with wilderness character are the responsibility of the BLM. The lands with wilderness characteristics inventory provided by the BLM for each field office was used as the baseline information in the lands with wilderness characteristics analysis for the TransWest EIS. Baseline information has been updated, as applicable, for the Final EIS.
Trout Unlimited	598-820	The best opportunity to adjust resource data and stipulations will be through required plan amendments.	The plan amendments in Chapter 4 are only intended to bring the proposed Project into conformance with affected land use plans. Plan amendments to update baseline data or establish new stipulations are beyond the scope of this EIS and would need to be addressed in a separate agency-driven effort.
U.S. Fish and Wildlife Service	556-1052	Page 3.7; Section General We recommend that the DEIS include an Appendix table of all wildlife species known to occur or likely to occur in the Project footprint. This should include at a minimum all mammals, birds, reptiles, and amphibian species.	Providing a comprehensive list of organisms potentially occurring within the analysis area of the TWE project is not consistent with lead agency direction and is outside of the scope of the purpose of NEPA analysis. No change to FEIS.

Table L-3 Response to Out of Scope Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Western Resource Advocates	565-1249	To provide increased confidence that the line will principally carry wind generated energy, TransWest, BLM, and Western should provide continuous, transparent updates on potential subscribers to the line and explicit statements of generation intent for the line in a manner that does not violate the Federal Energy Regulatory Commission (FERC) open access rules.	TransWest and Western are required to follow all applicable FERC regulations in the construction and operation of the proposed transmission line.
Western Resource Advocates	565-1250	If natural gas fired generation is used at all anywhere along the line or with any development option, it should be used primarily to enable the reliable integration of renewable resources and as a short-term transition fuel to enable the early retirement of coal-fired facilities. BLM and Western should provide full and transparent information about and justification for any natural gas plants that are being considered in association with this line. Where additional generation flexibility is needed to accommodate the new renewable energy plants, existing gas plants should be upgraded first to increase their operating capacity and efficiency. New natural gas plants should only be considered where additional generation flexibility beyond the upgraded plants is documented.	Neither coal powered nor natural gas powered generation is linked to this project. Any decisions regarding upgrades of existing power generation facilities are outside of the scope of the lead agencies' decisions to be made on this project.
Western Resource Advocates	565-1282	BLM and Western should strive for a "no net loss" or a "net gain" requirement for resources and values, with the goal of achieving a "net conservation benefit" for special status resources and species, including BLM Special Status Species.	The BLM is not statutorily required to ensure a no net loss of habitat resulting from its authorized actions. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcements of these measures in the Final EIS.
Western Resource Advocates	565-1283	BLM and Western should ensure that any loss of resources or values associated with the TransWest project is compensated with the addition and protection of equivalent or better resources and values offsite. For example, for high-quality habitat that is relatively scarce or becoming scarce on a national basis or in the ecoregion, BLM should ensure a net benefit of in-kind habitat value.	The BLM is not statutorily required to ensure no net loss of habitat resulting from its authorized actions. The EIS contains mitigation measures to address impacts to a variety of biological, physical, and human resources. The BLM will make a determination if compensatory mitigation is necessary for any resource, and if so, will establish resource-specific guidelines for application and enforcement of these measures in the Final EIS. Impacts to high quality, relatively rare habitats such as wetlands, riparian zones, and special status species' habitats would be avoided by spanning these resources where they must be crossed and siting towers and access roads in areas that avoid or minimize impacts. Compensatory mitigation for residual impacts to such resources, where required by statute or management agency policy, would be undertaken on either an acreage ratio or habitat services (e.g., HEA) basis.
Western Resource Advocates	565-1288	While mitigation for impacts to biological resources is critical, it should not be limited to just those resources. BLM and Western should address mitigation for impacts across the range of values and resources found on public lands, including but not limited to Lands with Wilderness Characteristics and Roadless Areas, visual resources, and opportunities for non-motorized recreation. Mitigation is still an evolving discipline and land use tool. With that in mind, we offer the following guidance for the mitigation goals within the EIS. Mitigation should enhance long-term health and viability of the impacted populations through permanent protections and others that last at least throughout life of project. These protections may require additional research to determine effectiveness, especially given unique nature of transmission impacts (linear and tall, direct and indirect). As impacts from TransWest will vary significantly across the 725-plus mile project distance, wherever possible BLM and Western should strive for an off-site mitigation that is implemented on a local scale than simply in the same ecoregion as the mitigation is durable and adds real benefit to the resource(s). Before a rigorous discussion of mitigation can take place, however, the complete extent of the potential impacts must be carefully assessed. This assessment must include for each endangered and threatened species – and should include for all candidate species – science-based estimates of the direct, indirect, and cumulative impacts throughout the length of the proposed line, and how the cumulative impact of the entire line adds to the other ongoing and reasonably foreseeable impacts throughout the ranges of the targeted species. Ecosystem-level planning and strategies should be employed in addition to species-specific analyses. An assessment tool or evaluation strategy approved by USFWS should be used to quantify the interim and permanent impacts (injury) to habitats (direct, indirect, and cumulative as outlined above) and the ecological services provided by those habitats. This will enable a more accurate and predictive approach to mitigating impacts across the entire line.	Impact avoidance, minimization, and mitigation measures presented in the TWE EIS are not limited to biological resources. The EIS contains a wide variety of BMPs, land use stipulations, applicant-committed environmental protection measures and design features, and proposed mitigation measures that address impacts to myriad biological, physical, and human resources. Ecosystem-level planning and strategy development are outside of the scope of the TWE EIS.

Table L-3 Response to Out of Scope Comments Received on Draft EIS

Commenter Name	Comment ID	Extracted Comment	Response
Wyoming Infrastructure Authority	466-496	<p>Third, we request that the Final EIS document better capture the tremendous economic benefits that the TWE Project will provide, not only in terms of creating American jobs but also in terms of saving rate-payers billions of dollars on their electricity bills over the life of the project. We are hopeful the Final EIS will weigh heavily the significant socio-economic benefits of the TWE Project's timely construction in Wyoming, Colorado, Utah and Nevada that will have a positive impact on the economy of the entire Western region and the workers that will build this project. Here are three specific studies we would like to see reflected in the Final EIS as they are pertinent to showing the positive socio-economic impact of the TWE Project. I have provided links to three news releases that provide more detail on each subject. - According to a WIA-commissioned study by the National Renewable Energy Laboratory in 2011, the development of 9,000 MW of new power transmission lines in Wyoming for export to California and other states would add \$12 billion to \$15 billion in total economic output in the State of Wyoming (construction plus 20 years of operation). An estimated average of 4,000-5,900 jobs would be supported from construction of infrastructure from 2011-2020 and 2,300-2,600 permanent jobs was estimated during operation of the projects. The TWE Project, at 3,000 MW of transmission capacity, would deliver about one-third of these benefits. More information on this NREL study can be reviewed at: http://wyia.org/wp-content/uploads/2011-06/2011wia-nrel-study-press-release1.pdf. Several studies have shown the economic and operational benefits for California's electric system by balancing and integrating California's renewables with wind energy obtained from Wyoming. For example, a groundbreaking wind diversity study prepared by the University of Wyoming in 2013 revealed that incorporating Wyoming wind energy in to California's electricity system would both reduce system volatility and the need to supplement California renewables with dispatchable generation. This would result in significant savings for utilities and their rate-payers. Moreover, incorporating Wyoming wind into California 's electric system would also significantly reduce emissions from fossil generating units that are needed to meet peak demand when California's renewables are not performing. The University of Wyoming Study projected savings to California electricity customers in excess of \$100 million annually. More information on this study is here: http://wyia.org/wp-content/uploads/2013/01/wia-calif-wyo-wind-diversity-news-release11.pdf . - Economic analysis conducted in 2011 by the Western Electricity Coordinating Council (WECC), which coordinates the bulk electric system across the Western U.S. and Canada, shows cost savings for California ratepayers by tapping a port ion of Wyoming's winds. WECCs U.S. Department of Energy-funded 10-Year Regional Transmission Plan analysis indicates that if California met just 20% of its renewable energy demand with deliveries of high-capacity wind energy from Wyoming, California ratepayers could save on the order of \$600 million every year, translating to billions of dollars in savings for those customers over time (does not include the additional savings projected at the University or Wyoming's geographic diversity study). More information on this study is here: http://wyia.org/wp-content/uploads/2011/09/news-release-wecc-10-yr-study-favors-wyoming-wind1.pdf .</p>	<p>Thank you for your comment regarding the potential indirect economic linkages between the proposed TransWest transmission line and wind turbine manufacturers and other related industries. Such linkages, while important, are beyond the scope of this EIS. No changes to the EIS were made in response to this comment. The potential benefits to ratepayers, although important and underlying the economic basis for considering construction of the project, are speculative and beyond the scope of this EIS.</p>