



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**JUN 1 - 2015**

Ref: EPR-N

Ms. Mary Jo Rugwell  
Acting Wyoming State Director  
U. S. Bureau of Land Management  
P.O. Box 1828  
Cheyenne, Wyoming 82003-1828

Mr. Mark Gabriel  
Administrator  
Western Area Power Administration  
P.O. Box 281213  
Lakewood, Colorado 80228-8213

Re: TransWest Express Transmission Project Final Environmental Impact Statement  
CEQ #20150121

Dear Ms. Rugwell and Mr. Gabriel:

The U.S. Environmental Protection Agency Region 8 reviewed the TransWest Express Transmission Project Final Environmental Impact Statement (EIS), and the subsequent errata sheets and addenda prepared by the U.S. Bureau of Land Management (BLM) and the Western Area Power Administration (Western). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

## **PROJECT DESCRIPTION**

The project applicant, TransWest Express, LLC (TransWest), proposes constructing and operating an approximately 725 mile-long, 600-kilovolt direct current transmission line, delivering approximately 3,000 megawatts of electric power from existing and future renewable and other energy sources in south-central Wyoming to a substation hub in southern Nevada. The project will serve Utah, Arizona, Nevada and Southern California. Other project components are two terminal stations near Sinclair, Wyoming and the Marketplace Hub near Boulder City, Nevada with AC/DC converter stations; access roads; and ancillary facilities, including communications systems and two ground electrode facilities. Included in the proposed action is a potential interconnection at the Intermountain Power Plant near Delta, Utah.

The project alignment was divided into four sections: Wyoming/Colorado, Colorado/Utah, Utah/Nevada, and Nevada, and each section had an Agency Preferred Alternative in the Draft EIS. The Agency Preferred Alternative changed in the Final EIS for three of the four sections and the EPA scrutinized these new Agency Preferred Alternatives for environmental impacts. Also, in the Final EIS,

the BLM and Western reduced the right-of-way width to 250 feet, providing a much clearer determination of potential direct versus indirect impacts.

## **EPA Comments**

We appreciate your responses to our comments on the Draft EIS in Appendix L, although we note that the first comment attributed to us, Comment ID 556-984, was not ours. Thank you for the enhanced introduction in Appendix C – Best Management Practices, providing the rationale for why the best management practices, design features, BLM stipulations, U.S. Forest Service standards and guidelines, and additional mitigation measures prescribed for the TransWest project are presented as separate entities.

One of our comments was not included in Appendix L. The comment addressed the hiring of a third party independent monitor to ensure compliance with mitigation commitments and stated that the EPA looked forward to seeing this commitment described in the Final EIS. It appears that the only place the compliance inspection contractor (CIC) is mentioned is in Appendix D, Plan of Development. The explanation of the CIC's responsibilities can be found in Appendix G of the Final EIS's Appendix D. We want to highlight the importance of the CIC position to assure that the environmental protection components of this project are implemented and effective. We therefore recommend increasing the profile of this commitment by specifically including it in the Record of Decision.

The EPA appreciates the enhanced discussion about desert soils in Chapter 3, acknowledging that when arid soils are disturbed there is a potential for additional dust and air quality impacts. The project team should be aware that there is new information regarding sole source aquifers, hanging gardens and other special aquatic resources in the project area being mapped and published continually. Also, the U.S. Army Corps of Engineers has developed regional supplements to their wetland delineation manual that must be used when appropriate (e.g., the Arid West Supplement).

Thank you for the opportunity to provide comments on the TransWest Express Transmission Project Final EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6704 or the lead reviewer of this project, Carol Anderson, at 303-312-6058.

Sincerely,



Philip S. Strobel  
Acting Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc by email: Sharon Knowlton, BLM Project Manager

