



***TOIYABE CHAPTER OF THE SIERRA CLUB
PO BOX 8096
RENO, NV 89507***

January 26, 2015

William Dunkelberger, Forest Supervisor
Humboldt-Toiyabe National Forest
1200 Franklin Way
Sparks, NV 89431

Dear Forest Supervisor:

I am commenting on the Draft EIS for the “Bordertown to California 120 kV Transmission Line Project on behalf of the Toiyabe Chapter of the Sierra Club. The Toiyabe Chapter has nearly 5,000 members in the Nevada and eastern California area and has for decades represented a large portion of the conservation community in this area. We have been involved also for decades in trying to preserve Peavine Mountain as a recreation and wildlife viewing focus for those in the urbanized valleys below it. In this particular case, I have not been able to thoroughly cover the DEIS, and I will offer only a short set of comments on the DEIS.

Basically, we do not support any of the proposed alternatives. In particular, the preferred alternative has a number of issues that we believe should be reexamined before preparing a final EIS. We realize that the USFS draws on regulations and policies to support the preferred alternative, but some of these instances may involve interpretations.

The “Summary of Action Alternatives” in Table 2.11-1 is a nice succinct comparison of the alternatives. We note that the preferred alternative (Poeville Alternative) has 18.0 new miles of transmission line, a fact which is clear on the accompanying maps. Of the 18.0 miles, 12.6 will be shared with an existing corridor, leaving 5.4 miles to be constructed in the new corridor across Peavine Mountain. The Mitchell Alternative leaves 7.1 new miles of corridor while the Peavine Alternative leaves 7.5 miles of new corridor. We agree that the preferred alternative has the least new corridor, thus satisfying the policy that the USFS should choose a path which utilizes existing corridors best. Yet this only saves 1.7 and 2.1 miles when compared to the Mitchell and Peavine Alternatives. What tradeoffs are made to minimize the number of miles to become new utility corridor? We don’t need to point out that the preferred alternative puts a power line on the part of Peavine Mountain facing the built-up portions of Reno and surrounding areas. We also point out that much of the route across Peavine for the preferred alternative will require temporary roads, will require construction on often fairly high slopes, and will disturb many intermittent stream channels. To gain a small decrease in number of miles of new corridor, the impacts of the preferred alternative need to weighed more carefully against per-mile impacts of

the other alternative routes. The preferred alternative has more stream crossings than the other alternatives according to Table 2.11-1, and this needs to be weighed. Moreover, it is not clear that NV Energy will actually be able to clear the hurdles of all the private land permitting, the issuance of new Special Use Permits by the City of Reno, Regional Plan Amendment, and the required NDEP permits.

Visual impacts are of prime concern to us. Development on the higher slopes and higher elevations around the Truckee Meadows have always brought our scrutiny. We feel that the VQO (Visual Quality Objectives) analysis is flawed. The KOP (Key Observation Points) on map 3.2-1 are not adequately distributed. For the Mitchell or Peavine Alternatives, none of the KOP's are really within the scenic areas along the routes. For the preferred alternative (Poeville) the KOP's are along the route, but this does not adequately capture the full visual impact of a power line on the side of Peavine which can be seen from wide portions of the valley below and other key observation points off the route. Moreover, due to the lack of vegetation on the south and east sides of Peavine Mountain, the visual impact is especially great. Although choice of the KOP's may follow policy, it does not seem appropriate in this context.

Impacts on forest habitat are also a big concern of ours. Although the preferred alternative would disturb or remove the most actual acreage of vegetation (Section 3.9.2), this vegetation is mostly of the low shrub and tree species when compared to the coniferous forests in the other routes on the west side of Peavine Mountain. Here, again, a weighting factor needs to be put on the acreage amounts of disturbance or removal. This weighting factor needs to account for the drier climate on the east and south sides of Peavine Mountain which makes recovery of vegetative communities difficult and definitely very long-term, with a high probability of invasive weeds and grasses.

In summary, we realize that this is not an easy choice. We believe the DEIS needs to be strengthened to defend that preferred alternative. The USFS may need to be prepared for some strong citizen objections when a decision is actually made to go with the Poeville Alternative.

Sincerely,

David von Seggern, Chair
Toiyabe Chapter, Sierra Club