MOHAVE COUNTY WIND FARM PROJECT
ENVIRONMENTAL IMPACT STATEMENT

SUPPLEMENTAL SCOPING REPORT

Prepared for:
U.S. Department of Interior
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Prepared by:
URS Corporation

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LIST OF ABREVIATIONS AND ACRONYMS

BLM	Bureau of Land Management
EIS	Environmental Impact Statement
MW	megawatt
NEPA	National Environmental Policy Act of 1969
NOI	Notice of Intent
NPS	National Park Service
NRA	National Recreation Area
Project	Mohave County Wind Farm Project
Reclamation	Bureau of Reclamation
Western	Western Area Power Administration

1.0 INTRODUCTION

The U.S. Department of the Interior, Bureau of Land Management (BLM), Kingman Field Office is preparing an environmental impact statement (EIS) to identify the potential effects of the construction, operation, maintenance, and decommissioning of the Mohave County Wind Farm Project (Project), a proposed wind generating facility and ancillary facilities that would produce up to 500 megawatts (MW) in northern Mohave County, Arizona.

The EIS is being prepared in compliance with the National Environmental Policy Act of 1969 (NEPA) and associated regulations. Scoping, the first step of the EIS process, was conducted for the Project between November 2009 and January 2010. During the 45-day scoping period, three public meetings and an agency meeting were held, and 71 comment submissions were received. The scoping process, including a summary of public comments and issues identified, is documented in a Scoping Summary Report (March 2010).

Based on additional studies, refinement of the preliminary Project description, and comments received during scoping, the Wind Farm Site (as defined below) has been revised to include land managed by the Bureau of Reclamation (Reclamation) while eliminating some Federal and private land previously identified as the subsequent phases of the Project. In addition, a potential opportunity to interconnect with the Moenkopi-El Dorado transmission line located about 6 miles south of the Wind Farm Site was identified, but would require the construction of a new transmission line on public and private lands. Because these changes to the Project occurred after conclusion of the scoping period in January 2010 and development was now being proposed on land administered by an additional Federal agency, a supplemental scoping period was established to allow stakeholders the opportunity to review updated Project information and identify additional comments or issues for consideration in the EIS. The second scoping period for the Project was initiated with publication of a second Notice of Intent (NOI) on July 26, 2010 in the *Federal Register, Volume 75, Number 142* (Appendix A), and concluded on September 9, 2010[1].

This report provides a summary of the supplemental scoping process and results for the Mohave County Wind Farm Project and is intended as an update to the March 2010 Scoping Summary Report, available on the BLM Project website, www.blm.gov/az/st/en/prog/energy/wind/ mohave.html.

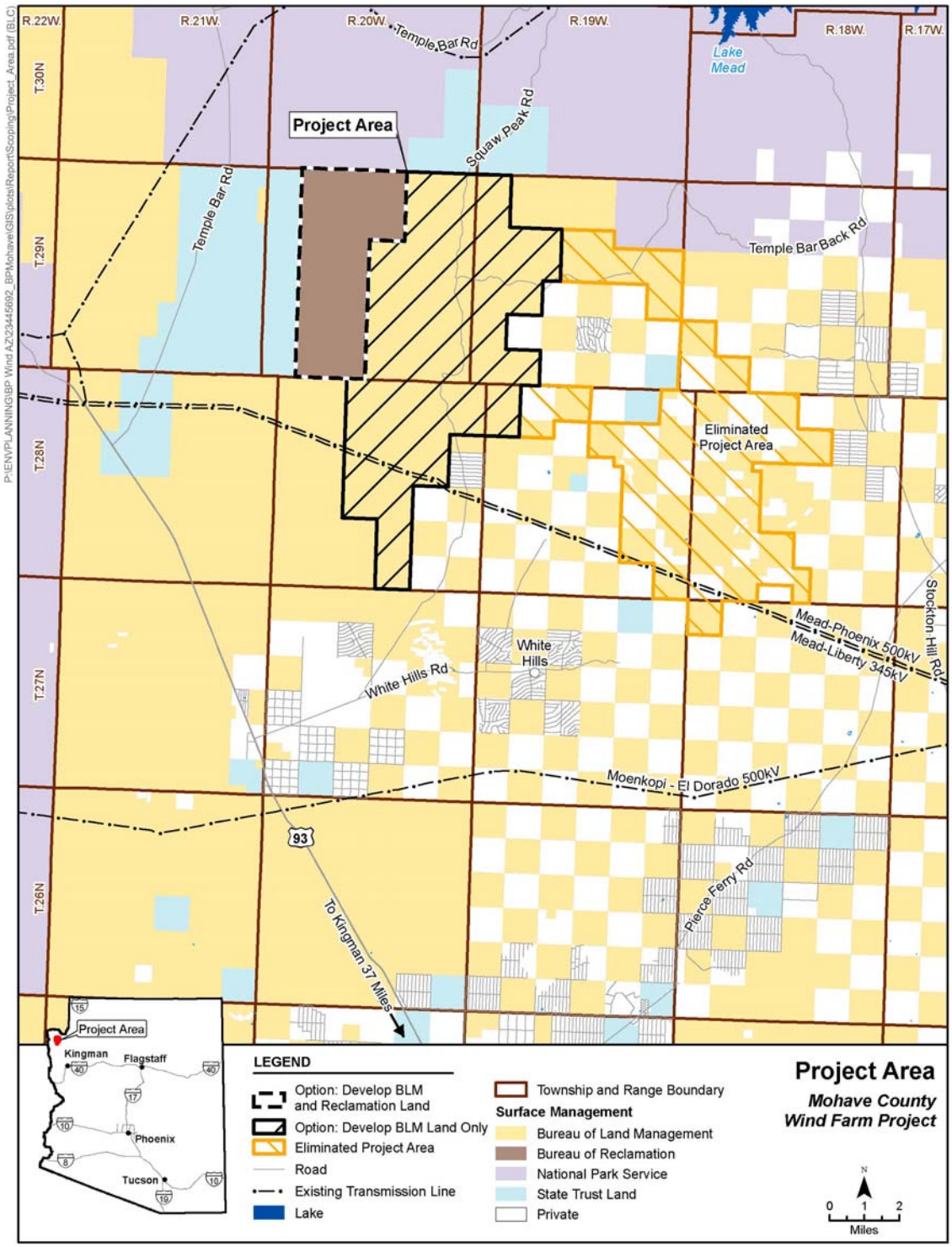
1.1 PROJECT LOCATION

The facility would be located in the White Hills area approximately 40 miles northwest of Kingman, Arizona in Mohave County, Arizona. The proposed site, as described during initial scoping, included 44,860 acres of public land administered by the BLM Kingman Field Office and 4,360 acres of private land. The proposed Project Area now includes 35,993 acres for the wind farm (the Wind Farm Site)—comprised of 27,033 acres of BLM-administered land and 8,960 acres of Federal land administered by Reclamation, located to the west of the BLM-administered land (Map 1-1)[2]. Land previously identified

[1] Although the NOI announced a 30-day scoping period, requesting that comments be submitted by August 25, 2010, the BLM accepted comments for 45 days, consistent with the initial scoping period. The revised comment submittal deadline was provided in several public notices, including a postcard, press release, and poster (as described in Section 2.0).

[2] Additional revisions to the Wind Farm Site occurred following supplemental scoping meetings held in August. Several parcels on the eastern edge of the Wind Farm Site were eliminated because no turbines or other project features are proposed in those areas of public and private land. Map 1-1 reflects these changes but differs from the Project Area map displayed at the scoping meetings.

Map 1-1 Project Location



as the subsequent phases of the Project, including 13,522 acres of BLM-administered land and 4,360 acres private land, is no longer under consideration. The Project Area also includes access to the Wind Farm Site from U.S. Highway 93 and a transmission line corridor, if needed, for an off-site interconnection to one of the existing transmission lines in the area. The transmission line corridor would be either an approximately 6-mile-long, 250-foot-wide corridor interconnecting to the Moenkopi-El Dorado transmission line, or a corridor parallel to and interconnecting with a transmission line operated by Western Area Power Administration (Western). The Wind Farm Site and these ancillary facilities comprise the proposed Project Area.

1.2 PROJECT PARTICIPANTS

As the Project proponent, BP Wind Energy, a wholly owned subsidiary of BP, a publicly traded company, or an affiliate, proposes to construct, operate, maintain, and eventually decommission a wind generating facility that would produce up to 500 MW.

An EIS is required because BP Wind Energy has applied for rights-of-way on BLM-administered land; consideration of these applications is considered to be a major Federal action (per 40 CFR § 1508.18) requiring an EIS. As the lead Federal agency, BLM will prepare the EIS to comply with NEPA; lead Section 106 and Section 7 consultation under the National Historic Preservation Act and Endangered Species Act, respectively; and issue or deny right-of-way grants authorizing the location of the Project and associated facilities on BLM-administered land.

BP Wind Energy also has submitted an application for right-of-way on land managed by Reclamation and a request to interconnect with Western's power transmission system. Reclamation and Western are participating as cooperating agencies during preparation of the EIS and will approve or deny the right-of-way application and interconnection request, respectively.

Other cooperating agencies involved in the preparation of the EIS include the National Park Service, Hualapai Tribe, Arizona Game and Fish Department, and Mohave County. These agencies will provide information for environmental analyses based on special expertise or jurisdiction by law.

2.0 SCOPING PROCESS

Methods used to notify the public about the supplemental scoping period and opportunities to provide comments were similar to those employed for the initial scoping period, and are summarized in the following sections.

2.1 NOTICE OF INTENT

The public was notified of the second scoping process and upcoming scoping meetings through an NOI published in the *Federal Register* on July 26, 2010 (Appendix A). The NOI described changes to the Project Area; including revisions to the BLM right-of-way application to consider a transmission line from the Wind Farm Site to the existing Moenkopi-El Dorado transmission line; and advised that specific dates, locations, and times of scoping meetings would be announced through the local media and on the BLM website. The NOI also provided information on how to submit comments.

2.2 MAILINGS AND POSTER

The public and many agencies were notified of the second scoping period and public scoping meetings through a postcard distributed to approximately 2,285 project mailing list addresses on August 9, 2010 (Appendix A). The postcard noted that changes had been made to the Project Area since scoping meetings had been held in December 2009, provided scoping meeting information, and encouraged the public to submit comments by September 9, 2010.

A poster announcing the public meetings was distributed by mail to the Dolan Springs Community Center, White Hills Community Association, and Rosie's Den in White Hills, Arizona. When a fourth scoping meeting was scheduled in Peach Springs at the request of the Hualapai Tribe, the poster was updated to include the additional meeting information and mailed to members of the Hualapai Tribe for distribution to tribal government offices and other community locations. Poster distribution was intended to increase public awareness of the scoping meetings in those areas where a newspaper notice may not have been visible or effective, and to reach those potentially interested parties who may not yet be on the Project mailing list. Copies of the postcard and poster are included in Appendix A.

2.3 MEDIA CONTACTS

The public also was notified of the scoping meetings through a press release distributed on August 5, 2010, to newspapers and other news outlets in the vicinity of the Project Area and regionally. The press release was sent to the same distribution list used for initial scoping, and also included county officials, elected officials, and Arizona congressional members. A copy of the press release is included in Appendix A.

2.4 WEBSITE

A website (www.blm.gov/az/st/en/prog/energy/wind/mohave.html) was established early in the project to provide project updates and public meeting information. The supplemental scoping period and scoping meeting dates were announced on the website; the NOI, Scoping Summary Report, project newsletters, and display boards from the August 2010 scoping meetings also are available on the website. Additional information, including newsletters, maps, and other documents will be posted to the website throughout the project. The Draft EIS also will be available for download during the public review and comment period.

2.5 PUBLIC SCOPING MEETINGS

Four public scoping meetings were held for the Mohave County Wind Farm Project EIS. Three meetings were held in the same communities as the initial scoping meetings; a meeting in Peach Springs was added at the request of the Hualapai Tribe and was attended by three Tribal Council members in addition to staff from the tribal planning and cultural resources departments. Each scoping meeting was held in an open house format, during which attendees could browse the information on display boards and speak informally to representatives from the Project team. Attendees were asked to sign in and each person was given a handout of Frequently Asked Questions and a comment form. Display boards containing information on the Project participants, description, and design options that would be considered in the EIS were displayed around the room and staffed by members of the Project team. Several visual simulations of the Project from key viewpoints in the Project Area also were provided. A map showing the traditional cultural areas of the Hualapai Tribe in relation to the proposed Project Area was displayed at the Peach Springs meeting.

Comment forms were available at each meeting for attendees to provide written comments at the time of the meeting, or to return by mail. Locations, dates, and attendance of each public meeting are shown in Table 2-1. Copies of scoping meeting materials are provided in Appendix B.

Table 2-1 Public Scoping Meeting Attendance

Location	Date	Attendance	Date	Attendance
	Scoping 1		Scoping 2	
Dolan Springs, Arizona Dolan Springs Community Center	December 8, 2009	21	August 26, 2010	15
Kingman, Arizona Hampton Inn	December 9, 2009	37	August 24, 2010	25
White Hills, Arizona White Hills Community Center	December 10, 2009	52	August 25, 2010	28
Peach Springs, Arizona Hualapai Cultural Center	–	–	August 27, 2010	15
Total attendance at scoping meetings		110		83

3.0 SUMMARY OF SCOPING COMMENTS

According to the BLM NEPA handbook, "an issue is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect" (BLM 2008). Issues can help to shape a proposed action and direct the development of alternatives, for example, through the identification of design features or mitigation measures that may reduce potential impacts.

Following the conclusion of scoping in January 2010, the Project Area was revised and several Project options were identified for analysis in the EIS (e.g., turbine color, transmission interconnection location, and size of the Project Area). Additional scoping was offered so that issues relative to the most current proposed action could be identified and considered in the refinement of alternatives, environmental studies, and EIS, as appropriate.

Although the supplemental scoping period did not begin officially until publication of the NOI on July 26, 2010, in this report the BLM has considered all comments received between January 8, 2010 (the official close of the first scoping period) and September 9, 2010. The Project team used the same process employed during initial scoping to enter comment submissions and categorize comments into issues and sub-issues. This process allowed the team to identify primary issue areas or concerns overall, consider all public comments received on the Project, as well as comparatively assess how the level of concern or frequency of an issue may have changed after initial Project scoping and changes to the Project Area.

The following provides a summary of comments received during the supplemental scoping period. In some instances initial scoping comments may be referenced for comparative purposes; however, a complete discussion of scoping comments and the process used to organize and categorize issues is included in the March 2010 Scoping Summary Report.

3.1 SUMMARY OF PUBLIC COMMENTS

During initial scoping, 71 comment submissions were received and entered into a comment database. Within the 71 comment submissions, 398 issues were identified and categorized into 15 main categories of issues and 41 categories of sub-issues, allowing the Project team to identify areas of concern and quantify issues on both broad and detailed levels.

Public comments received following the close of scoping on January 8, 2010 also were entered into this database; 20 comment submissions were received between January 8 and July 25, 2010 and 22 comment submissions were received during the formal supplemental scoping period (July 26, 2010 through September 9, 2010). Within these 42 comment submissions, 76 issues were identified. In total, 113

comment submissions have been received during the Project, in which 474 issues have been identified. As shown on Figure 3-1, overall, biological resources were the most frequently mentioned issues. This total is based primarily on a large number of comments received from special interest groups during initial scoping.

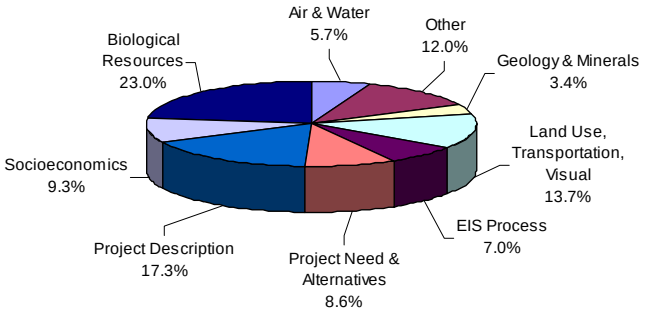


Figure 3-1 All Comments by Issue

When all comments are considered collectively, no resource area demonstrated a substantial shift in interest level (based on percentage of total issues identified) with comments received during supplemental scoping. However, this is largely due to the larger volume of issues identified during initial scoping (398), compared with those identified during supplemental scoping (76). Table 3-1 demonstrates how each resource category changed when supplemental scoping comments were factored into the total issues identified.

Table 3-1 Percent of Comments by Issue

Main Issue	Percent of Total Issues Identified – Scoping 1*	Percent of Total Issues Identified – All Comments**	Change in Total
Project Description	18.6	17.3	-1.3
Project Need	3.3	3.4	0.1
Project Alternatives	4.5	5.3	0.8
NEPA Process	8.0	7.0	-1.0
Air Quality	3.3	2.7	-0.6
Biological Resources	24.1	23.0	-1.1
Cultural Resources	2.8	2.3	-0.5
Cumulative Effects	3.5	4.2	0.7
Geology and Minerals	4.0	3.3	-0.7
Hazardous Materials and Safety	1.5	1.3	-0.2
Land Use, Recreation, and Transportation	6.3	8.0	1.7
Noise	3.8	4.2	0.4
Socioeconomics	8.5	9.3	0.8
Visual Resources	4.3	5.7	1.4
Water Resources	3.5	3.0	-0.5

* Based on 398 issues identified through scoping 1.

** Based on 474 issues identified; cumulative of all comments received during the Project

Although the table above shows only a minor shift in total issues, comments received during supplemental scoping demonstrated in many instances consistent areas of concern and noticeable shift in the frequency of issues mentioned. The Project team reviewed only the 76 issues received during supplemental scoping to distinguish which issues were most frequently mentioned in supplemental scoping, and to compare those comments to issues identified in initial scoping. As summarized in Table 3-2, land use, visual resources, and socioeconomics were the most frequently mentioned issues in supplemental scoping comments, showing a much higher level of concern when recent comments are considered apart from the collective totals. For example, land use accounts for only 8 percent of all issues identified (as shown on Table 3-1), but more than 17 percent of issues identified during supplemental scoping. Even when all comments are considered overall, land use experienced the highest degree of change (1.7 percentage points), while most resources changed less than 1 percentage point (see Table 3-1, above).

Table 3-2 Percent of Supplemental Scoping Comments by Issue

Main Issue	Total Issues Identified – Scoping 2	Percent of Total – Scoping 2
Project Description	8	10.5
Project Need	3	3.9
Project Alternatives	7	9.2
NEPA Process	1	1.3
Air Quality	0	0
Biological Resources	13	17.1
Cultural Resources	1	1.3
Cumulative Effects	5	6.6
Geology and Minerals	0	0
Hazardous Materials and Safety	0	0
Land Use, Recreation, and Transportation	13	17.1
Noise	5	6.6
Socioeconomics	10	13.2
Visual Resources	10	13.2
Water Resources	0	0
Total Issues Identified in Comments	76	100

Although quantifying and analyzing issues provides insight on how public comments or concerns may shift throughout a project or respond to changes in the project description, it is important to note that all significant issues identified during public scoping will receive the same consideration in the EIS and the frequency of a specific issue does not influence the decision making process.

3.2 ISSUES IDENTIFIED DURING SCOPING

The following section provides a sample of representative comments received during supplemental scoping. Although many of these comments and issues are similar to those identified during initial scoping, this summary provides a context for current public interest areas and how the level of concern for particular resources may have changed over time. These issues, as well as those identified during initial scoping, will be considered and analyzed in the EIS.

Project Description

Comments in this category were general in nature, consistent with comments received during initial scoping. Comments included questions or suggestions regarding Project components or locations (i.e., access to site).

- The turbines use a great deal of electricity themselves. Most of them cannot even run without input from the grid...It may be that large wind turbines use as much electricity as they produce.
- Should the project be approved, access should come from the north either from the Temple Bar Road network, or in working with the BLM directly to grade a road directly from [Highway] 93 to the proposed O&M building site identified by BP Wind.

Project Purpose and Need

Only two comment submissions discussed purpose and need for the Project; similar to comments received during initial scoping, one of these submissions focused on potential consumers of power generated by the Project. The other comment submission questioned the need for the Project.

- Home use of electricity varies widely through the day, week, and year, but wind plants generate electricity by the whims of the wind rather than the actual needs of the grid...The turbines are often shut down, because it is so rare that good wind coincides with peaking demand.
- I asked the BP representative to talk to the electric providers to find a way to provide electricity to Hualapai.

Project Alternatives

Of the seven comments in this category, six referenced Project location, reflecting a high level of interest consistent with comments received during initial scoping. However, while initial scoping comments focused more broadly on the use of previously disturbed sites rather than undisturbed public land, recent comments focused on the Project's use of adjacent private land. Commentors either expressed concern that eliminated private land would again be considered for development, or conversely, offered their parcels for purchase or lease.

- Renewable energy should be developed BUT it should be developed in a way that affects the least amount of public land.
- I have property in the White Hills that was previously considered for a part or phase of this wind project. What are the possibilities that the area(s) would be considered again?
- It's time to end this ridiculous waste of our public lands and start providing stimulus for private rooftop solar.

Biological Resources (Vegetation and Wildlife)

Compared to initial scoping comments, this category reflects a substantial shift of concerns expressed in public comments. Comments regarding biological resources accounted for only 14 percent of comments, compared with 24 percent during initial scoping. Additionally, although the majority of initial scoping comments focused on bat and avian species, these more recent comments were fairly diverse and reflected no dominant interest area. However, consistent with initial scoping, this category remains of interest to special interest groups and agencies; of the 13 comments received in this category, 10 were from two comment submissions (The Wildlife Society and National Park Service [NPS] Lake Mead National Recreation Area [NRA]).

- I know there is a small herd of Antelope in the area of this proposed wind farm. I would like BLM and the [Arizona Game and Fish Department] to be aware of these animals. They seem to have a rough existence in this area and building a wind farm would only add to the stress on these animals that are sensitive to the ever increasing pressures of smaller and smaller areas of land to roam.
- The National Park Service is very interested in the restoration plan for these lands. The strategy to prevent the invasion of alien plants and noxious weeds is critical to the management of this project. These concerns extend beyond the construction period and need to be evaluated for the life the project.
- Dangers to avian and bat species will be particularly problematic. Transmission lines in particular pose a potentially deadly obstacle to flight.
- In desert ecosystems recovery from disturbances can be especially slow. Maintenance and activity around the project site will continue to impede recovery even after construction is finished. The unique conditions and features of desert ecology should be considered at every step of the development process.
- The potential effects on the native – and threatened -- desert tortoise (*Gopherus agassizii*) are of particular concern...Special attention to the desert tortoise and the future of the Mojave Desert population will be needed.

Cumulative Effects

Five comments regarding cumulative effects were received during supplemental scoping, which will be considered along with the 15 comments in this category received during initial scoping. All five comments in this category referenced concern over the cumulative effects of multiple renewable energy projects proposed throughout Nevada and Arizona, consistent with comments received during the initial scoping process.

- On a larger scale, there are concerns over how much of the public domain adjacent to Lake Mead NRA is available for alternative energy development. We understand that, in Nevada, there are over 75 alternative energy proposals under some level of consideration by the BLM and assume that there are many similar proposals in Arizona as well. What are the management document(s) guiding Bureau of Land Management and the Bureau of Reclamation in the land use decisions relative to dedicating lands for alternative energy projects? How will you evaluate the cumulative impact of the many proposals now being submitted for Arizona's public lands?

Land Use, Recreation, and Transportation

This issue was the most frequently mentioned and reflected the area of highest concern in comments, accounting for 17 percent of supplemental scoping comments. This represents a substantial shift in public concern compared with comments received during initial scoping, where land use accounted for only 6.3 percent of the comments received. Concerns focused primarily on impacts to private property, including turbine placement on private land (prior to changes made to the Project Area), impacts to adjacent residences and developments, and concerns over new access roads or access restrictions.

- BP wind farm would...block access to those of us who explore and hunt in this area.
- The thousands of truck traffic counts proposed by a project of this magnitude will result in unsafe conditions for the general public, EPA PM-10 non attainment levels from the excessive dust, a collapse of the existing White Hills roadway pavement infrastructure, and serious traffic warrant improvements at the intersections far beyond the existing ability to accommodate this. With the

construction phase anticipated to extend from 1.5-2 years, thousands of trucks travelling the existing dirt roads through my development, and the safety issues associated with this truck traffic will most assuredly destroy any ability for development in the region – which is not acceptable under any terms.

- The project area is popular for backcountry exploration. With the proposed level of development, how will public access be impacted and what public use restrictions will be required? Will the public continue to have access to this area?
- Seriously consider what a negative impact this will have on many of the private owners that have anxiously awaited a chance to develop this land.

Noise

Of the five comments received, two were from NPS Lake Mead NRA and two were from the developer of a master planned community proposed adjacent to the Project site.

- The [project] area is adjacent to proposed wilderness, and natural quiet is an important component of the area's wilderness character.

Socioeconomics

Socioeconomic concerns also were frequently mentioned in public comments, and similar to the land use issues, comments were closely related to effects on adjacent property and local residents. Most comments focused on impacts to property values, and questioned the economic or local benefits that would be received from the Project.

- If I allow BP to install wind turbines on my property, what type of compensation would I receive?
- We provide the public land, we underwrite the project, we take the risk, we pay the higher rates, we pay for the new power lines, we live with the eyesore and health issues, and we eat the cost of lower property values. They get the profits.
- What is the affect on property values where wind turbines of this quantity are installed? I would like to be able to have access to the statistics on property values before and after in areas where wind turbines were already installed.

Visual Resources

Following land use, visual resources experienced the second highest increase in public interest during supplemental scoping. While visual resources accounted for only 4.3 percent of initial scoping comments, 13.2 percent of supplemental scoping comments discussed visual resources. Again, comments related closely to impacts to adjacent residents, developments, and viewsheds.

- We are also interested in how the proposed boundary change will affect the view-shed for visitors travelling to Temple Bar as it has moved the boundary west of Squaw Peak. With this change, it may be important to develop additional photo simulations from key locations including the entrance to the park along the Temple Bar Road.
- I do not agree with expanding the project westward, over the line of hills in T29N, R20W. Placing windmills on the west slope causes visual degradation in Detrital Valley along Temple Bar Road. Also, the placement of windmills in sections 27 and 34, T28N, R20W degrades the view from a large area in T29N, R19W. This area is a beautiful valley with views of Mt. Charleston and is a great place to develop a housing development. The windmills would have an impact on this area and ruin a great view.

- The adverse visual aesthetics so near my development could well prove to be an insurmountable hurdle in the ability to market and sell homes in the White Hills Central portion of my project…I believe the sight of a multitude of large wind towers that will readily be seen from Highway 93 is directly adverse to the existing sweeping expanse of desert vistas which travelers now enjoy across the Detrital Valley.
- I think the gray towers blend better and are less visible.
- More information needed showing direction to Boulder City view from high ground (unit 2 water tank) simulation of view at night lights etc.

REFERENCES

Bureau of Land Management (BLM). 2010. Mohave County Wind Farm Project Scoping Summary Report. March.

_____. 2008b. *BLM Handbook H-1790-1. National Environmental Policy Act.* January.