

**FINDING OF NO SIGNIFICANT IMPACT
(FONSI)**

LC-17-18

**Harry Allen to Eldorado 500 kV Transmission Project (Project)
DesertLink, LLC**

Based on a thorough review of the analysis presented in the environmental consequences section of the Final Environmental Assessment (EA), the Bureau of Reclamation (Reclamation) finds that implementation of Alternative 1 will not significantly affect the quality of the human environment within or adjacent to the project area, therefore an Environmental Impact Statement (EIS) will not be prepared.

This Finding of No Significant Impact has, therefore, been prepared and is submitted to document environmental review and evaluation of Alternative 1 in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended.

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Recommended: [Signature] Date: 20 Sep 17
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Approved: [Signature] Date: 9/20/17
Chief, Resources Management Office



BACKGROUND

The Bureau of Reclamation (Reclamation) is proposing to amend License No. 09-07-30-L0710 (License), issued to DesertLink LLC (DesertLink), formerly Great Basin Transmission. The License, issued in April 2015, is for an authorized but not yet constructed transmission line known as the Harry Allen to Eldorado 500 kV Transmission Line Project (Project) (formerly Southern Nevada Intertie 500kV Transmission Line Project or SNIP). The License authorizes the Project on approximately six miles of Reclamation managed lands adjacent to Henderson, Nevada. DesertLink has requested the amendment to authorize a change (discussed below) in the Project design.

In November 2014, Reclamation issued FONSI LC-14-33 for the Proposed Action described in the Final Environmental Assessment (EA) for SNIP (DOI-BLM-NV-S010). Since the majority of the Project will be located on Bureau of Land Management (BLM) managed land, the BLM was the lead Federal agency for the EA; Reclamation was a cooperating agency and adopted the EA. The BLM issued a FONSI, Decision Record, and Right-of-Way (ROW) for the Project on BLM managed lands. Reclamation’s FONSI and the EA can be found at: <https://www.usbr.gov/lc/region/g2000/envdocs.html> and are incorporated by reference into this FONSI.

The EA analyzed a Proposed Action, Alternative 1, and a No Action alternative. Detailed information on these alternatives can be found in the EA; summaries are included in FONSI LC-14-33. The Proposed Action will include construction of either a single-circuit or double-circuit 500 kV transmission line approximately 60 miles in length, as well as the required access roads, temporary work areas, fiber optic communication equipment, series compensation equipment, geotechnical investigations, and all other components of the Proposed Action as described in the EA. The transmission line will begin at the Harry Allen Substation and terminate at the Eldorado Substation.

Alternative 1 is identical to the Proposed Action with an important exception. Only 42 miles of new transmission structures will be constructed, and DesertLink will utilize approximately 18 miles of open position on existing double-circuit transmission towers associated with NV Energy’s previously approved and constructed Harry Allen to Mead 500 kV transmission line project. All of the Reclamation land crossed by the Project is in this 18-mile segment; no new transmission towers or other permanent structures will be built on Reclamation land. Alternative 1 will require fewer new and improved roads on Reclamation land than required by the Proposed Action as shown in the table below.

Road Type	Proposed Action (miles)	Alternative 1 (miles)	Decrease in improved and new roads under Alternative 1 (miles)
Improved	3.8	2.0	1.8 fewer
New	2.6	1.1	1.5 fewer

DesertLink now wishes to implement Alternative 1 rather than the Proposed Action as they have executed a new commercial arrangement which will allow them to implement this alternative. DesertLink has also applied to the BLM for an amendment to their ROW.

This FONSI has been prepared to document Reclamation's determination that Alternative 1 will not significantly impact the human environment. Reclamation did not identify potentially significant issues from Alternative 1 at the time of issuance of FONSI LC-14-33, however DesertLink did not think the new commercial arrangement would be established, and therefore Alternative 1 was not included in Reclamation's FONSI.

Environmental Commitments

DesertLink has committed to an extensive list of generic and selective environmental protection and mitigation measures as outlined in their Preliminary Plan of Development (POD), and incorporated into Alternative 1. The measures are intended to minimize or avoid impacts to resources in the Project area, including biological, cultural, soils, land use, air quality, water, visual, and paleontological resources. In addition to those measures incorporated into Alternative 1, further minimization and mitigation measures were developed during the NEPA and National Historic Preservation Act (NHPA) analysis and consultation with the U.S. Fish and Wildlife Service (USFWS) pursuant to Section 7 of the Endangered Species Act (ESA). Adherence to these additional measures will be a stipulation in the License. A brief summary of these measures is given below:

Mitigation: DesertLink is required to comply with the environmental commitments, mitigation measures, and terms and conditions included in the followed documents which are incorporated by reference into this FONSI:

- BLM *Determination of NEPA Adequacy*, DesertLink LLC Amendment N-86359, DOI-BLM-NV-S010-2017-0103-DNA. September 2017.
- *Harry Allen to Eldorado 500 kV Transmission Project, Preliminary POD*, March 2017.
- *SNIP Biological Assessment (BA)*, submitted to USFWS in October 2014.
- *SNIP Biological Opinion (BO)*, issued by USFWS on November 7, 2014, amended by USFWS July 28, 2017. The applicable terms and conditions are contained in the November 7, 2014 BO and are still in effect.
- *SNIP EA*, November 2014.
- *Programmatic Agreement (PA) among the Southern Nevada District Office of the BLM, Reclamation, the National Park Service, Clark County Parks and Recreation, GBT, and the Nevada State Historic Preservation Officer, regarding the Southern Nevada Intertie Project, developed pursuant to Section 106 of the NHPA.*

Monitoring: Monitoring activities will occur as specified by BLM, Reclamation, State of Nevada, and Clark County agencies, in accordance with applicable laws, regulations, and permit conditions. These monitoring activities include, but are not limited to:

- Requirements included in a Historic Properties Treatment Plan, developed pursuant to the PA in compliance with Section 106 of the NHPA.
- All monitoring that is stipulated in the BO, BA, EA, and POD.
- A Compliance Inspection Contractor (CIC) will provide ongoing compliance inspections and monitoring during the construction of the Project. BLM will appoint the CIC with the concurrence of Reclamation.

- An authorized Desert Tortoise biologist, as qualified and approved by the USFWS, will be onsite during Project activities within Desert Tortoise habitat.
- A biological monitor will be present during the migratory bird-nesting season.

Final Plan of Development: The License will contain a stipulation requiring DesertLink to prepare a POD for Reclamation’s review and approval prior to issuance of a notice-to-proceed with construction. The POD will include the following details:

- A comprehensive map set which includes:
 - The location of all physical Project facilities.
 - The location of planned temporary work areas, including transmission structure work pads, pull and tension sites, conductor splicing sites, and other work areas.
 - The location of sensitive resource areas to use in planning the route of new access roads.
- Right-of-Way Preparation, Rehabilitation, and Restoration Plan
- Flagging, Fencing, and Signage Plan
- Noxious Weed Management Plan
- Biological Protection Plan
- Paleontological Monitoring and Treatment Plan
- Fire Protection Plan
- Hazardous Materials Management Plan

ENVIRONMENTAL IMPACTS AND FINDINGS

It is Reclamation’s determination that the implementation of Alternative 1 will not significantly impact the human environment, and an EIS will not be required. The BLM completed a Determination of NEPA Adequacy in September 2017 that documents that the conclusions regarding Alternative 1 in the EA remain valid, and no further analysis is needed. Reclamation’s determination in FONSI LC-14-33, that the Proposed Action will not significantly impact the human environment, remains in effect.

Implementation of Alternative 1 will not result in significant impacts to any of the resources evaluated in the EA. Under Alternative 1, there will be fewer impacts to resources on Reclamation land than were identified for the Proposed Action, as no transmission towers will be constructed and fewer access roads are needed. The reasons for Reclamation’s determination for Alternative 1 are given below.

Resources Evaluated in the EA

Air Quality: The EA documented that air emissions associated with Alternative 1 would be primarily short-term and minimal and chiefly associated with engine exhaust due to combustion of fossil fuel in construction equipment and fugitive dust during the construction period. Cumulative impacts to air quality were determined to be minimal as construction impacts from the Project will be short-term in duration and will not occur simultaneously with any other projects proposed in the area.

Geology and Minerals: Alternative 1 may produce small amounts of mineral materials through excavation for structure foundations. Any excess materials will be used as backfill and spread around structure locations or put to use within the right-of-way. Impacts to mineral resources will be mitigated through the placement of towers and access roads, such that Alternative 1 construction and facilities do not restrict access to mineral resources within the Project area. Since impacts to mineral resources will be mitigated, no cumulative impacts to geology and minerals were identified.

Soils: Proper mitigation measures will be required during construction of Alternative 1 in order to avoid or minimize damage resulting from erosion and prevent acceleration of natural-erosion processes. The placement of access roads will be selected to avoid soils that are moderately or highly sensitive to accelerated rates of water or wind erosion. Significant cumulative impacts to soils are not anticipated because construction impacts from the Alternative 1 will be short-term in duration and will not occur simultaneously with any other projects proposed in the area.

Water Resources: After implementation of site-specific BMPs, impacts to surface water, groundwater, and water quality are expected to be negligible to minimal. Impacts related to floodplains for individual structures and roads will be negligible. No impacts to water resources on Reclamation land are anticipated because the only waterway located on the Reclamation land, Las Vegas Wash, will be spanned by the overhead lines. No measureable cumulative impacts are anticipated.

Vegetation: Applicant-proposed environmental protection measures were developed to avoid and minimize potential impacts to botanical resources from construction, operation, and maintenance of Alternative 1. Existing roads and previously disturbed areas will be used for the Alternative 1 alignments to the extent reasonably possible to minimize new surface disturbance. Additional information on vegetation can be found in FONSI LC-14-33.

Significant cumulative impacts are not anticipated because of the mitigation measures that will be implemented.

Wildlife: Formal consultation with the USFWS was requested pursuant to Section 7 of the ESA regarding the Project's potential impact to the Mojave Desert tortoise. USFWS appended this action to the BLM's programmatic BO that determined the Project is not likely to jeopardize the continued existence of the Mojave Desert tortoise and no critical habitat will be affected. Through a combination of applicant proposed protective design features, avoidance and minimization measures set forth in the BA, and the terms and conditions of the BO, impacts to the Mojave Desert tortoise shall be avoided or minimized. The BO was amended in July 2017 to reflect the amendment to the ROW and License to authorize Alternative 1. This amended the disturbance acreage and remuneration fees to be paid; all other aspects of the appended BO remain the same.

Informal consultation with USFWS pursuant to Section 7 of the ESA was also requested for concurrence that the Project may affect but is not likely to adversely affect the southwestern willow flycatcher and the western yellow-billed cuckoo. Habitat for these two bird species occurs in the Las Vegas Wash which is part of the action area for the Project. Since the Project features will span the Wash and no habitat will be affected, and certain monitoring and

avoidance protocols will be implemented, the USFWS concurred that the Project may affect but is not likely to adversely affect the southwestern willow flycatcher or western yellow-billed cuckoo.

For those portions of the Project that are located on non-Federal lands, the applicant will be required to comply with the applicable measures set forth in the Clark County Multi-Species Habitat Conservation Plan.

Various other wildlife species may be impacted in the Project area due to construction activities. Implementation of protective design features and minimization measures such as use of existing access roads and work areas, preconstruction surveys, monitoring during construction, and post-construction restoration should effectively minimize or avoid impacts.

Significant cumulative impacts are not anticipated because of the mitigation measures that will be implemented.

Cultural Resources and Indian Sacred Sites: Alternative 1 will be located adjacent to multiple existing facilities within a previously modified setting. Large portions of the Project area have been previously surveyed for cultural resources and there are known National Register of Historic Places (NRHP)-eligible cultural sites within the direct and indirect areas of potential effect for this project. However, as specified in the EA, a Class III cultural resources survey, NRHP eligibility determinations for identified cultural resources, and treatment to avoid and/or mitigate adverse direct and indirect effects to cultural resources, will be required prior to construction. In addition, the PA includes provisions for consultation, unanticipated discoveries, and monitoring of sensitive cultural areas. Given these survey and treatment requirements and the ongoing monitoring requirements of the PA, Alternative 1 is not expected to have a significant adverse effect or cause the loss or destruction of scientific, cultural, or historic resources, including those listed in or eligible for listing in the NRHP. There will be no impacts to Indian Sacred Sites, including cumulative, as no Indian Sacred Sites have been identified in the Project area.

Paleontological Resources: A Paleontological Resources Treatment Plan will be developed and include: (1) a pre-construction survey in areas containing known fossil localities with a Potential Fossil Yield Classification (PFYC) of 3, 4, or 5; (2) determination of areas that may require on-site paleontological monitoring during construction; and (3) mitigation of paleontological resources that may be discovered during construction, primarily through paleontological monitoring, fossil collection, curation, and deposition in a Federally-approved repository. The scientific and educational value of the fossils and their associated contextual data constitute the chief significance of the resource. Their collection, therefore, mitigates the impacts to paleontological resources. Alternative 1 is not expected to contribute to cumulatively significant effects to paleontological resources due to the mitigation of impacts.

Land Use, Recreation, and Access: Operation and maintenance of the proposed transmission line will not conflict with existing Federal, State, or county land use plans, policies, or regulations applicable to the Project area. The construction and operation of Alternative 1 is not anticipated to interrupt dispersed recreational activities on adjacent public lands. Alternative 1 will not preclude recreational uses of the Project area, but rather will temporarily displace

recreational users to surrounding recreation areas if access roads are restricted due to construction.

The Project and the majority of foreseeable transmission and renewable energy projects in the area will be within or adjacent to designated utility corridors. Cumulative impacts will be minimized and are not expected to be significant because of consolidation of projects within these corridors.

Visual Resources: Sensitivity Levels, distance zones, and Visual Resource Inventory (VRI) Classes will not be affected by the Proposed Action because the local setting in which Alternative 1 is proposed has been highly modified by existing transmission line facilities. Impacts to specific Key Observation Points (KOPs) along the alignment are expected to be low.

Visual impacts on Reclamation land will be limited to temporary construction activities and new access roads. Cumulative impacts from Alternative 1 were not found to be significant as this concentration of transmission lines was anticipated when the corridor was designated, visual impacts are already present from the existing transmission lines, and mitigation measures will be implemented to minimize impacts.

Socioeconomics: The economic effects of constructing the transmission line will have little discernible effect on the overall levels of personal income and employment in the region. However, some positive effects will result during construction, not only in the form of direct employment, but also from procurements of construction materials and services from local suppliers and businesses. More substantially, Alternative 1 will benefit the economy over the long-term by maintaining reliable electric power service for the growing number of residents, industries, and renewable energy projects in the region. Given the small effect to overall levels of personal income and employment in the region, Alternative 1 was not found to have a measurable cumulative impact to socioeconomics.

Environmental Justice: Two of the nine census tracts crossed by Alternative 1 contain a minority population over 50 percent and a low-income population. No disproportionate impacts were identified for these areas. There will be no environmental justice impacts, including cumulative impacts, from implementation of the Alternative 1.

Indian Trust Assets: There will be no impacts, including cumulative impacts, to Indian Trust Assets as no Indian Trust Assets have been identified in the Project area.