



**Great Basin Group
Sierra Club
P.O.Box 8096
Reno, Nevada 89507**



January 28, 2009

BLM-Carson City District Office
Attn: New Comstock Wind EIS Project Manager
5665 Morgan Mill Road
Carson City, NV 89701

Dear Project Manager:

These comments are in response to the request for EIS scoping comments on the New Comstock Wind Energy Project.

Source of These Comments:

These comments are made on behalf of the Great Basin Group of the Toiyabe Chapter of the Sierra Club. The Great Basin Group comprises over 2500 members in the northern Nevada area, with the vast majority of these in the Reno/Sparks/CarsonCity area. Should the project be built, it is certain that almost all of the members in the local area would see this wind farm when traveling US 395 or when hiking and skiing in the Sierra Nevada. It is certain that they will all benefit from the clean power produced. Our comments are mostly focused on plant and wildlife issues, with the idea of preserving the natural state of the project area as much as possible.

Scoping Comments:

1. As an overall goal, the EIS should address maintaining, insofar as possible, the landscape ecosystem encompassing this project. A basic survey should include identifying for preservation the intact significant natural resource areas such as the swales and the aspen grove near the southern microwave site. It should study, in all the alternatives, the removal of the road running through the aspen grove and fencing it off to protect it from recreation use. It should include a survey the proposed turbine sites and new roads to them for rare or sensitive species.
2. Conduct an inventory of important plant communities and their associations. Include in each alternative the avoidance of any impact to the white fir trees and aspen groves.

Develop a plan in each alternative to protect any critical wetland areas from disturbance in this project.

3. The EIS should include an inventory of wildlife and should designate key species, such as deer, for management. In general, we support the NDOW protection and mitigation goals described in “Guidelines for Wind Power Development - Nevada Department of Wildlife” (2008). This document should serve as a guide in developing needed protections for wildlife.

4. NDOW has also produced a document directly bearing on the impact of renewable energy development on the sage grouse across Nevada (“Potential Impacts of energy development on greater sage-grouse (*Centrocercus urophasianus*) and their habitat in Nevada” , 2008). This document should guide the EIS on site-specific plans to avoid possible impacts on sage grouse, especially if any leks are uncovered in the biological survey.

5. Conduct a study of the proposed turbine sites and new roads to them for rare or sensitive avian species. This study must also quantify in this area the migratory and resident bird species, and the EIS must evaluate how to eliminate impacts to these species in all the alternatives. Bird kills from the wind project need to have ongoing monitoring, and mitigation plans to address bird kills must be required for the life of the project. Clearly defined actions which are triggered by thresholds of bird kills must be a part of the project constraints in order to protect avian species.

6. The same as the above paragraph pertains to bat kills.

7. Include in at least one alternative the elimination of some roads because, under this project, more will be built. Presently, the ridge-top seems to have many “user-created” roads which are marginal at best for access or for recreational opportunities. Each alternative in the EIS should include limiting travel to designated roads, and closed roads should be signed and remediated.

8. Each alternative should address mitigation for additional roads or road widening required by the project. The upgrading of existing roads to handle the transport of wind turbine components should be carefully monitored to protect the integrity of high slopes and prevent erosion. Road cuts will result in loss of vegetation, and so consideration should be given to enhancing vegetation or re-vegetating in other areas to replace this.

9. One alternative at least should investigate the use of part of the old flume road for a haul road. This flume road already exists; reopening it may actually save total disturbance due to the widening and road-cuts which will be needed on the current route.

10. Because the site lies within an area of Nevada where M 7 earthquakes might occur with significant probability in the next 50 years, earthquake hazard is a concern. It

requires study and evaluation by a qualified seismic engineer during the drafting of the EIS. The seismic hazard is not related to the turbines alone, but also to the road upgrades, maintenance facilities, and transmission lines associated with this project.

1. The EIS should offer, in at least one alternative, the establishment of a “lease” system for cell towers, wind turbines, and other uses on this ridge, with the proceeds specifically used to manage the area which will begin to take on somewhat of an “industrial” character after the wind farm is constructed.
2. The EIS should treat, in all its alternatives, preservation of recreational usage within the project area, consistent with necessary maintenance of the wind turbines. Planning should be done to support continued recreational use over the project lifetime.
3. The effect of turbine noise on ambient noise levels which now exist in Washoe Valley and in Virginia City, Gold Hill, and Silver City should be thoroughly addressed. Levels of absolute noise at low frequencies must be considered on the dBC scale. The dBA levels normally used in ambient noise reporting are not appropriate for low-frequency, harmonic sources such as wind turbines. In particular, Virginia City will be downwind of several of the turbines for prevailing winds on this ridge. The combination of this configuration with local topography must be included in modeling studies of possible wind noise concentrations.
4. The EIS should address the creation of permanent signage which will describe the wind project in the context of beneficial renewable energy and explain why this particular site was chosen.

Respectfully submitted,

David von Seggern, Conservation Chair
Great Basin Group, Toiyabe Chapter, Sierra Club