

consideration to give to protecting the NHTs also does not seem to be consistent across this document. Your application of energy corridor standards is also inconsistent. The public deserves to understand fully your rationale for choosing the routes you have and should not be left, as we currently are, with the sense that you have massaged different data points in order to meet your preconceived desires. And it is simply not sufficient to state categorically that a route or a technique is “technically or economically not feasible.” The public deserves better.

Chapter Three comments:

3.2.8.3: Issues Identified for Analysis

Your third question is: *Can adverse effects on archaeological resources and historic properties be avoided?* Unfortunately, as so often happens, this is only half of the question that should, and must, be asked. The other part of this question is *Can adverse effects on archaeological resources and historic properties be **minimized**?* because NHPA does not just require avoidance and mitigation. In between, it requires that adverse effects be **minimized**. Yet, all too often, we see the BLM ignoring this crucial step. As a result, by the time the project gets to the Section 106 working group, the opportunity for creative minimization has passed. Yes, it is likely that the BLM will have requested, for example, camouflage painting of storage tanks or a less glaring paint color on the transmission towers or wind turbines. And, yes, it is likely that minor siting adjustments will have been made to minimize visual disturbances. But creative application of the mandate to minimize adverse effects, such as by employing the Choi+Shine design identified above, is hardly ever seen and I find it telling that the need to minimize did not even make your list of questions. I strongly urge you to devote significant effort to answering that new question before you release the FEIS.

In general, though, I do wish to commend you on the APE designated in this DEIS. I believe the 10-mile indirect APE, centered on the project, is properly drawn and designated. While I believe the level of impact to the NHTs resulting from this project will necessitate off-site compensatory mitigation to mitigate the full and cumulative effects under NEPA, the 10-mile corridor will at least offer good on-site NHPA mitigation opportunities for the Section 106 working group to consider.

Thank you for this opportunity to comment on your DEIS. I look forward to your additional analysis of the issues I have raised.

Sincerely,

Lesley Wischmann