APPENDIX K8
BUSINESSES

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COMMENT(S)

RESPONSE(S)

B1 **Baker Produce South, Inc.**

comment@boardmantohemingway.com

From: Gertsch, Tamara <tgertsch@blm.gov>
Sent: Thursday, March 19, 2015 2:49 PM
To: Ray Outlaw
Subject: Fwd: FW:
Attachments: 20150319100659874.pdf

Here ya go . . .

Tamara Gertsch
BLM National Project Manager
5353 Yellowstone Road
Cheyenne, WY 82009
307-775-6115
307-287-3656 (cell)
tgertsch@blm.gov

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997

'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

---------- Forwarded message ----------
From: **Tim Tippett** <ttippett@westernmort.com>
Date: Thu, Mar 19, 2015 at 11:50 AM
Subject: FW:
To: "tgertsch@blm.gov" <tgertsch@blm.gov>

The originally provided email was undeliverable.

Tim Tippett

-----Original Message-----
From: copier@oregonpotato.com [mailto:copier@oregonpotato.com]
Sent: Thursday, March 19, 2015 7:07 AM
To: Tim Tippett
Subject:

This E-mail was sent from "RNPE9499D" (Aficio MP C5000).

Scan Date: 03.19.2015 10:06:59 (-0400)
Queries to: copier@oregonpotato.com

1

COMMENT(S)

RESPONSE(S)

B1 **Baker Produce South, Inc. (cont.)**

March 18, 201

Ms. Tamara Gertsch
BLM National Project Manager
Bureau of Land Management
100 Oregon Street
Vale, OR 97918
tgertsch@blm.gov

RE: Boardman to Hemingway ("B2H") Transmission Line Project ("B2H Project") - Comments on the DEIS- Destruction of Oregon Farmland

We write to submit our comments in regards to the B2H Project and in opposition to the Agency Preferred Alternative (i.e. Longhorn Variation) and the Longhorn Alternative. Baker Produce South, Inc. owns a large amount of land easterly and adjacent to Bombing Range Road which land is leased to an affiliate, Pasco Farming Company, Inc. A large amount of potatoes are produced on said lands which are necessary to feed Oregon Potato Company, another affiliated company located in Boardman, OR that produces dehydrated potatoes for various customers, such as Kellogg's and Frito Lay, among others. The loss of use of some of these lands will adversely affect our ability to provide product to this plant. In light of glaring deficiencies in the EIS process; adverse effects of the project on unique, irrigated farmland; and the Bureau of Land Management's (BLM's) failure to consider routing alternatives that would largely avoid impacting high-value irrigated farmland, Baker Produce South, Inc. and Pasco Farming Company, Inc. respectfully submits the following comments:

B1a

1) **Due to Lack of Proper Notification and Insufficient Time, the DEIS Comment Period Should Be Extended by 60 Days**

The current Agency Preferred Alternative (the Longhorn Variation) was eliminated from consideration in June 2010. Although we and other local landowners remained active in the B2H Project's scoping and commenting period, we were not made aware of the Longhorn Variation and possible negative impacts on [Name of Farm or Land] until this year, giving us very little time to familiarize ourselves with this project and submit comments.

In light of BLM's eleventh-hour selection of the Longhorn Variation as the Preferred Alternative, local landowners who have been involved with this process for years are scrambling to meet the March 19th deadline. Because 90 days is an unreasonable time to review, understand, and react to the drastic route changes the B2H Project continues to make, a 60-day extension on the comment period is a reasonable request given the size and scope of the consequences of this transmission line. Additional time to submit comments will allow *Baker Produce South and Pasco Farming*, as well as other interested and impacted parties, to further assess the facts and circumstances surrounding the B2H Project and provide relevant input into the determinations involved in the B2H Project.

2) **The DEIS Drastically Underestimates the Effects of the B2H Project on Surrounding Agricultural Land**

B1a

This alternative was developed when the Applicant revised their SF-299 application to include the Longhorn Substation. Refer to Sections 2.1.1.3 and 2.5.2.

The minimum comment period is 60 days; an additional 30 days was provided. Also, Draft EIS public meetings were held. Please refer to Section 4.3 for a discussion of the public participation process.

COMMENT(S)

B1 **Baker Produce South, Inc. (cont.)**

B1b

The DEIS is unclear about the impact of the B2H Project on prime, irrigated farmland and appears to gloss over the dire economic losses on local farmers. The DEIS contains numerous inconsistencies regarding affected agricultural land and requires clarification. *See, e.g.,* DEIS § 3.2.6.6 at 3-438, *ll.* 29-30.

The Columbia-Snake River Irrigators Association (CSRIA) estimates that impacts to irrigated farmland during both construction and operations will be substantial -- in the range of 350 to 1,050 acres. Technical Memorandum from Darryll Olsen, CSRIA, to Tamara Gertsch, BLM at 3 (Mar. 17, 2015). The CSRIA, through a technical expert, recently estimated that the fair market value of irrigated farmland in the region is $7,500 - $10,000 per acre. *Id.* Thus, the total value of impacted irrigated agriculture would be approximately $2.6 million to $10.5 million, and the estimated present value of associated regional income loss would be about $12.5 million to $17.4 million. *Id.* at 4. The DEIS improperly characterizes these economic impacts as "low," when nothing could be further from the truth. *See* DEIS § 3.2.6.6 at 3-439, *ll.* 11-13.

B1c

The DEIS is also misleading because it claims that the Longhorn Variation and Longhorn Alternative will impact less prime farmland than the Proposed Action. This is inaccurate because the DEIS's acreage figures mistakenly focus on so-called "prime" farmland that theoretically *could* be farmed rather than actual irrigated farmland that is currently in use. BLM's reliance on theoretical farmland suggests a mistaken belief that irrigated farmland can simply be replaced. However, this is not the case, as irrigated farming is highly dependent on soils, geography, water deliver, and irrigation conditions – lost farmland cannot merely be moved to or recovered in other locales. Given the unique circumstances required for irrigated farming, BLM's concession in the DEIS that the Proposed Action will disturb 32 *more* acres of irrigated agriculture than the Proposed Action directly contradicts its claim that the Longhorn Variation will impose less harm on agriculture land than the Proposed Action. *See DEIS* at 3-438, *ll.* 29-30. Indeed, the Longhorn Variation and Longhorn Alternative will impose greater harm on irrigated farming than any of the other alternatives.

3) The DEIS' Cumulative Impact Analysis is Deficient

B1d

As BLM is aware, activity for wind and other energy projects in Morrow and nearby counties remains high. The B2H Project presents a continuing threat to surrounding farmland because it potentially creates a transmission line corridor straight through productive irrigated farmland. This is a particular concern because Oregon law provides that one of the factors in evaluating whether a project should be granted an exception to allow siting in areas designated for exclusive farm use is whether the project uses an existing right of way. *See* ORS 215.275. Thus, there is a high likelihood that this corridor will continue to expand and in turn consume additional farmland to meet increasing demands for transmission capacity.

In light of the above, the DEIS's cumulative impact analysis is deficient because it fails to address the cumulative impact of the B2H Project when considered in conjunction with the various wind energy projects proposed in the region. For instance, the DEIS omits discussion of the proposed 500 MW Wheatridge Wind Energy Facility, which has provided notice that it may connect to the grid through the Longhorn Variation corridor. The Wheatridge project should have been included and was inexplicably absent from the DEIS. Moreover, we understand that additional energy projects, including Perennial Windchaser and Ella Butte, could potentially utilize the transmission corridor created by the Longhorn

RESPONSE(S)

B1b

The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS include a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. See Section 3.2.7 for revisions.

The economic analysis in Section 3.2.17 includes additional data on effects to irrigated farmland from the construction and operation of the B2H Project. The revised analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

B1c

The analysis of impacts on agriculture for all alternatives in the Final EIS includes a comparative quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. See Section 3.2.7 for revisions.

B1d

A discussion of this potential effect has been added to Types of Potential Effects in Sections 3.2.7 and 3.3.3.7. Additionally, the Applicant has proposed an additional action to construct a 230-kV transmission line along Bombing Range Road for the potential wind farms (including those you have mentioned) that may in the future need to tie in to the grid. This 230-kV is discussed for each resource, including irrigated agriculture, under the Applicant's Proposed Action and is referred to as Additional Action – 69-Kilovolt Line Replacement Options 1, 2, and 3.

COMMENT(S)

RESPONSE(S)

B1 **Baker Produce South, Inc. (cont.)**

B1d
B1e

Variation based on their location. Together, these projects generate an influx of power and create a risk of further cumulative impacts to irrigated farmland along the transmission corridor. We urge BLM to consider these impacts in detail and carefully weigh the severe effects on nearby farmland in light of other feasible routes such as the Slatt Alternative as described below.

4) The Original, Southerly Route or the Slatt Alternative Should Be Considered for the B2H Project and the Longhorn Variation and Longhorn Alternative Should Be Removed from Consideration.

The original Proposed Action, the Southerly Route, was wisely chosen by Idaho Power because of its minimal impact on Oregon farmland and was presented to the local community as the preferred route from 2010 through 2014. The Southerly Route would connect through the proposed Grasslands Substation. Similar to the Southerly Route is the Slatt Alternative, which would follow the Southerly Route before turning west and terminating at the existing Slatt substation, which is the major 500-kV interconnection hub serving the northeastern Oregon Region. The last-second deviation to the Bombing Range Road route is a surprising and concerning development for several reasons, outlined below.

- The Slatt substation is already built and suitable for wind farms. The Longhorn substation to the north has yet to be built and will meet strong resistance from the local community.
- The Southerly Route and the Slatt Alternative have minimal impact on the local agricultural community. That route will be met with little public, environmental and political resistance.
- The Longhorn Routes condemn prime farmland and will be much more expensive than the Southerly Route or the Slatt Alternative. Irrigation pivots cannot be used near the transmission lines, and once a crop circle is shortened, the entire farm is compromised. In connection with a condemnation action, each pivot circle area impacted would need to be purchased in its entirety from the property owner.
- The Southerly Route or the Slatt Alternative would prevent environmental and federal issues. Idaho Power's newly favored Bombing Range Road route will result in a negative impact on an endangered species that has been documented previously.

B1f

We welcome any opportunity to discuss our comments with you – please feel welcome to contact with any questions you may have.

Sincerely,

Tim M. Tippett

Vice President

B1e See response to B1d.

B1f In response to public comments received in the Draft EIS, the analysis of impacts on prime farmland along the Longhorn Alternative has been expanded in the Final EIS. The Applicant has indicated that most pivots can be used under the transmission line in the right-of-way. The transmission line structures would be located outside of pivots wherever possible, and their locations would be selected in coordination with the landowner so as to minimize impacts on operations and irrigated farmland. Where structures cannot be located outside of pivots, landowners would be appropriately compensated. See Section 3.2.7.6 for further discussion of impacts on prime farmland, pivot irrigation, and irrigated agriculture.

COMMENT(S)

B2 **Battle Creek Outfitters**

B2H Transmission Line Project
Boardman to Hemingway

COMMENT FORM

Date: 3-16-15
First Name: TOM Last Name: Hamper
Organization or Affiliation (if any): Battle Creek Outfitters
Address: 63460 Pella Ln.
City: Bend State: OR Zip: 97701
E-mail address: Tom@battlecreekoutfitters.com Phone: 541-280-7378

Privacy Statement: *Before including your address, phone number, e-mail address or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold identifying information, we cannot guarantee that we will be able to do so.*

☑ Please check here if you wish your personal information to remain confidential.

Comments must be submitted by March 19, 2015.

My comments on the Boardman to Hemingway Transmission Line Project are:

As guides and outfitters who've leased this property for many years we have first hand knowledge of the great effort that has gone in to protecting the habitat on John Williams' ranch. The grazing is closely monitored at all times, the two indigenous shrubs – serviceberry and ninebark – are carefully protected and it is home to large herds of elk and other wildlife. Our clients often voice their appreciation for the natural beauty of this property.

The option that calls for the power lines to cross this property places them at a higher elevation and requires a large swath of timber to be cut, sharply interrupting the viewscape, and further fragmenting existing habitat as well as disrupting wildlife movement. Research has shown that avoidance of fragmented habitat by deer & elk poses a significant stressor resulting in expenditure of vital winter stores and, ultimately, increasing winter mortality. →

B2a

Boardman to Hemingway Transmission Line Project | P.O. Box 655, Vale, OR 97918

RESPONSE(S)

B2a Comment noted. Potential impacts of the B2H Project on big game habitat are addressed in Section 3.2.4.5.

The Applicant has committed to Design Features and site-specific Selective Mitigation Measures designed to minimize anticipated B2H Project effects to big game and other wildlife, such as seasonal and spatial restrictions, creation of a Plan of Development that includes a Biological Resources Conservation Plan, and limiting new or improved accessibility to sensitive habitat.

COMMENT(S) | **RESPONSE(S)**

B2 **Battle Creek Outfitters (cont.)**

Boardman to Hemingway
Transmission Line Project
P.O. Box 655
Vale, OR 97918

PORTLAND OR 970
17 MAR 2015 PM 5 L

Boardman to Hemingway Transmission Line Project
P.O. Box 655
Vale, OR 97918

97918065555

(fold along line and tape edges to mail)

We would much prefer the option of the western route where the power lines would be lower, obstructing the view to a lesser degree as well as limiting the effect on the wildlife and habitat!

COMMENT(S)

RESPONSE(S)

B3 Bokides Properties LLC

comment@boardmantohemingway.com

From: Dessa Bokides <dbokides@yahoo.com>
Sent: Thursday, March 19, 2015 1:51 PM
To: comment@boardmantohemingway.com
Cc: Nick Bokides; Heitho Bokides Reuter
Subject: Comments
Attachments: Comments B2H.docx

To whom it may concern,

Attached are my comments relating to the Boardman to Hemingway Project.

Thank you.

Dessa Bokides
dbokides@yahoo.com
303 246-2840 office/cell

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COMMENT(S)

B3 **Bokides Properties LLC (cont.)**

Boardman to Hemingway

Comments submitted by:
Dessa Bokides
Land Owner, Bokides Properties LLC
4665 S. Franklin St.
Englewood, CO 80113
303 246 2840
dbokides@ yahoo.com

The following comments refer to Large Maps 12, 13 & 22 (of 23) as well as various sections in Segment 4, ie the Brogan Segment of the Environmental Report on the proposed Boardman to Hemingway Project. In particular, they refer to *the Proposed Route, markers 196 through 200; the Willow Creek Alternative (marker 1 to 4) and the Tub Creek Alternative (marker 1 to 4).* All of these segments severely affect Bokides Properties LLC land.

B3a **Paragraph 1:** Referring to Map 22 of 23, the Proposed Route, the Willow Creek Route and the Tub Mountain Route converge at section 14S44E01100 Bokides Properties LLC, marker 199 to 200. The Proposed Route makes a 90 degree angle at section 14S44E01100 Bokides Properties, LLC. This maximizes its encroachment on private property while there is a BLM alternative available.

B3b **Paragraph 2:** It would be relatively easy for the power line to go through section 14S44E00300 USA, government land that lies between the Bokides and Davis private land and follow the I84 corridor. In

B3c order to do this, the proposed route would go from post 202 directly onto government land across sections 21, 22, 23 and up through the government section 14S44E00300 USA turning 90 degrees on government land and connecting at the corner of the Proposed Route traversing a straight line through markers 197 and 198.

B3d **Paragraph 3:** Changing the route to go through government land would not lengthen the route or cause any financial hardship to the project. It would alleviate the impact on private land owners.

B3e **Paragraph 4:** Section 14S44E01100 Bokides Properties, LLC has a large sage grouse population and is home to ProngHorn and other wildlife. In addition, there are archeological sites that have been identified on the land.

B3f **Paragraph 5:** As noted in the forward of the Project, the financial and environmental impact of the line should be borne, whenever possible, by the large population that it serves ie, whenever possible, the line should go through public lands as opposed to private lands. In the case of this segment, the Bokides Properties LLC land has as many if not more areas that would be impacted environmentally and culturally as the government land so there is no reason to favor condemning private land.

Paragraph 6: Again, referring to Map 22 of 23, The Willow Creek Route Alternative maximizes damage to Section 14S44E02700 Bokides Properties, LLC by routing through the middle of the land.

RESPONSE(S)

B3a Comment noted. Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

B3b Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

B3c See response to Comment B3b.

B3d Analysis has been expanded to include alternative route variations with careful consideration of private lands. Input from the landowner and the impact on property rights will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B3e The Greater Sage-Grouse analysis has been revised for the Final EIS to include additional information on the potential direct and indirect effects from the B2H Project. The B2H Project will be sited, designed, and implemented to adhere to a mitigation hierarchy that will result in a net conservation gain for Greater Sage-grouse.

The Applicant has committed to design features and site-specific mitigation measures to minimize impacts to sensitive wildlife, including preconstruction surveys, seasonal and spatial restrictions for sensitive periods and habitats, minimization of timber and other vegetation clearing, spanning/avoiding sensitive features (e.g., water bodies), and a Plan of Development that includes a Biological Resources Conservation Plan. Refer to Section 3.2.4.3 in the Final EIS.

Comment noted. If the alternative route is selected for construction, cultural resources would be evaluated and analyzed under Section 106 of the National Historic Preservation Act and any adverse effects to cultural resources would need to be resolved per the Programmatic Agreement for the B2H Project.

B3f Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/options, which were incorporated into the network of alternative routes analyzed for the Final EIS. To the extent practicable, land ownership was considered. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

B3 Bokides Properties LLC (cont.)

Comment(s)

B3g **Paragraph 7:** The land it routes through has an artesian well and is good farmland. It is the most agriculturally productive piece of the Bokides Properties LLC lands in that area.

B3h **Paragraph 8:** The land is also the most likely land for a home as it has natural water and is easily accessible. A large transmission line through the property would significantly affect its worth.

B3i **Paragraph 9:** Water on the site makes it a natural habitat for sage grouse and other wildlife. A power line would create a place for predators to perch and attack the sage grouse. In addition, the buzzing could affect their breeding and affect their natural habitat.

B3j **Paragraph 10:** There are identified archeological sites on the northern section of the land that would be disturbed by the construction of the line

B3k **Paragraph 11:** There is a relatively easy route for the line to avoid crossing 14S44E02700 Bokides Properties, LLC if the Willow Creek Alternative is chosen. The line could turn west at marker 6 (Willow Creek Alternative) and travel through 15S45E00500 USA, and intersect at section 35 post 3 of the Tubb Creek Alternative. It would then follow the same path as suggested in Paragraph 2.

Paragraph 12: 14S44E02700 Bokides Properties, LLC has as much or more environmentally and culturally sensitive land as the alternative route proposed in Paragraph 11 over government land. Therefore there is no reason to condemn private land when a government route is available.

Response(s)

B3g This artesian well has been added to Section 3.2.7.5 as a water source for irrigated farmland, which increases crop production in this area.

B3h Analysis has been expanded to include alternative route variations with careful consideration of private lands. The impact on property rights will be carefully considered by Idaho Power during micro-siting. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B3i The Greater Sage-Grouse analysis has been revised for the Final EIS to include additional information on the potential direct and indirect effects from the B2H Project. The B2H Project will be sited, designed, and implemented to adhere to a mitigation hierarchy that will result in a net conservation gain for Greater Sage Grouse.

The Applicant has committed to design features and site-specific mitigation measures to minimize impacts to sensitive wildlife, including preconstruction surveys, seasonal and spatial restrictions for sensitive periods and habitats, minimization of timber and other vegetation clearing, spanning/avoiding sensitive features (e.g., water bodies), and a Plan of Development that includes a Biological Resources Conservation Plan. Refer to Section 3.2.4.3 in the Final EIS.

B3j Comment noted. If the alternative route is selected for construction, cultural resources would be evaluated and analyzed under Section 106 of the National Historic Preservation Act and any adverse effects to cultural resources would need to be resolved per the Programmatic Agreement for the B2H Project.

B3k See response to Comment B3c.

COMMENT(S)

RESPONSE(S)

B4 **Burnt River Ranch – March 19, 2015 [1]**

comment@boardmantohemingway.com

From: Raeann Van Arsdall <raeannvanarsdall@gmail.com>
Sent: Thursday, March 19, 2015 5:18 PM
To: comment@boardmantohemingway.com
Subject: Doug Shook - EIS B2H comments attached
Attachments: Doug Shook Comments March 2015 B2H EIS.pdf

My comments regarding the EIS B2H comments are in the attached PDF file.
Doug Shook
541-877-2000

Copy below, secondary to attached.

Douglas Shook Burnt River Ranch

Landline 541-877-2000 31116 Burnt River Canyon Lane

Email raeannvanarsdall@gmail.com Durkee, OR 97905

Tax lots: three affected Private land condemned by the

11S42E03200, 11S42E03500,11S42E03600 Burnt River Mountain Alternative

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Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."

comment@boardmantohemingway.com

Vale District Office

100 Oregon Street, Vale, Oregon 97918

P.O. Box 655, Vale, Oregon 97918

Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

Statement: I am 68 years old, and a veteran of the US Army, having served in Vietnam. The Burnt River Mountain Alternative is unacceptable and fatally harmful to our environment, our community and our local economy. It will affect me, my community and the future generations of my family and our privately owned land that I've worked so hard to build and protect. The

1

COMMENT(S)

RESPONSE(S)

B4 Burnt River Ranch – March 19, 2015 [1] (cont.)

Draft EIS underestimated the effect of the Burnt River Mountain Alternative, by neglecting to provide an adequately fair and balanced report. Evidence of where it failed to account for both Environmental and Economic impacts made by this alternative is clear and detailed in each of the topics included in, but not limited to, the items listed below – and in every aspect of the EIS. There is also a blatant lack of purpose and need for this project, evident in all topics and chapters throughout the EIS.

Visual effect is one subject we are told we cannot use in our comments though BLM uses it extensively. They had a man make a study and presentation to us at a town meeting in Baker City on the visual effect of the power line and how it can be lessened for the view from the freeway by going across our ranch. Also crossing our land it would not have a negative visual effect on BLM land in the Burnt River canyon.

My concern is not for the long-haul truck driver on I-84 but for myself, my wife, my daughter, my son in law, my granddaughter, and my grandson. All of whom live and work on this ranch in a family owned business. And our paying guests who come here to enjoy the beauty of this land and our western life style.

Living under and looking up at a powerline corridor day in and day out for the rest of our lives is not an option we accept.

B4a At no time did the BLM or Idaho Power ever ask for permission nor at any time did we give permission for them to use our private land for their private use. I find this kind of business attitude unacceptable and offensive.

B4b Don Gonzoles with BLM visited our ranch and was shown where the line is proposed. I then showed him an alternate route of my choosing to the west of our deeded ground on BLM land that would cross the Burnt River canyon at a narrow part, barely visible to the public and continue south on dry range land avoiding sage grouse habitat and thereby staying off valuable farm ground and not disrupting the social and economic balance of the Durkee Valley. Mr Gonzoles noted this.

Lack of purpose and need

B4c It is clear that neither the applicant, nor the state of Idaho has had a significant enough growth to warrant this powerline and would be at best ten or more years out. This means to me that there is no real need to build this line. The present administration in Washington DC is trying to bolster a failed presidency using Idaho politicians to push through this part of a power grid improvement though there is no real need for it.

Reference to EIS: Summary, S-2, Line 5 to 8

2

B4a Comment noted. The agencies' decisions are whether or not to grant a right-of-way on public lands administered and under what conditions. The agencies have no jurisdiction on private lands. Agreements with private landowners will be negotiated with the landowner by the Applicant.

B4b Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended local routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

B4c The Applicant's 2015 Integrated Resource Plan (IRP), a long-term resource planning study, recently reaffirmed that the B2H Project is essential to serving future growth in customer demand. Previous IRPs also identified the need for this transmission line project, going back to the 2006 IRP. The 2015 IRP indicates the need of the B2H Project remains strong. When finished, the B2H Project would help provide low-cost energy to the Applicant's customers in southern Idaho and eastern Oregon. The B2H Project also will interconnect with existing transmission systems owned by B2H Project partners PacifiCorp and the Bonneville Power Administration, allowing greater amounts of electricity to move throughout the Pacific Northwest. This helps meet a regional need and provides benefits to the entire area, much of which is served, directly or indirectly, by those two providers. In addition, the B2H Project allows the Applicant to serve its growing load without building carbon-emitting resource.

B4 Burnt River Ranch – March 19, 2015 [1] (cont.)

COMMENT(S)

B4d Idaho Power has proposed and thoroughly studied a preferred route through Baker Co. following the energy corridor already in place. BLM has suggested alternate routes by drawing arbitrary lines on maps that have not been thoroughly studied for environmental and economic impact to the extent the preferred route was. This makes an unbalanced judgement of the impacts to us, the land owners directly affected by the Burnt River Mt. alternative.

B4e In light of the lack of study of environmental and economic impact of those of us affected on this route, and the lack of permission ask for or given, and the lack of real need for the powerline at all, crossing our land is not an option available to them.

B4f If Idaho Power insists on building a project with no real need the route should cross Burnt River canyon west of Sinker Creek, west of our deeded ground, and continue south from there on dry range land.

Our neighboring ranches agree that this route would be far less damaging than crossing more highly valued irrigated farm land.

Economic impact

B4g Our ranch is not only a working cattle ranch but also a guest ranch registered with the State of Oregon as Burnt River Guest Ranch. Agri-tourism is and has always been our main focus. We strongly feel that having a high voltage powerline corridor through the very heart of our ranch would be devastating to our family owned business. The existence of a powerline would devalue and deface our ranch property to the point that agri-tourism would be jeopardized making it impossible to run a profitable business.

Historic cultural impact

B4h Rock cairns exist in the path of the Burnt River Mt. alternative. They are important to the history of Baker Co. whether they are Native American or Basque sheep herder in origin. The fact that they were not known of by the BLM or Idaho Power is another example of lack of study done on the alternate routes compared to the preferred route.

Environmental impacts

Environmental impacts on our ranch alone involve Big Horn sheep that not only graze here but are here during the rut season in the fall and lambing in the spring. Bald Eagles and Golden Eagles are here in pairs during the

3

RESPONSE(S)

B4d See response to Comment B4b. Also, the colocation with existing utilities is a siting criterion for identification of routing options.

B4e Comment noted. The Applicant's 2015 Integrated Resource Plan (IRP), a long-term resource planning study, recently reaffirmed that the B2H Project is essential to serving future growth in customer demand. Previous IRPs also identified the need for this transmission line project, going back to the 2006 IRP. The 2015 IRP indicates the need of the B2H Project remains strong. When finished, the B2H Project would help provide low-cost energy to the Applicant's customers in southern Idaho and eastern Oregon. The B2H Project also will interconnect with existing transmission systems owned by B2H Project partners PacifiCorp and the Bonneville Power Administration, allowing greater amounts of electricity to move throughout the Pacific Northwest. This helps meet a regional need and provides benefits to the entire area, much of which is served, directly or indirectly, by those two providers. In addition, the B2H Project allows the Applicant to serve its growing load without building carbon-emitting resource.

B4f Comments noted.

B4g Comments noted. Analysis has been expanded to include alternative route variations with careful consideration of private lands. Input from the landowner and the impact on property rights will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B4h These resources are characterized in the qualitative discussion in the Final EIS and have been verified by BLM archaeologists. If the alternative route is selected for construction, cultural resources would be evaluated and analyzed under Section 106 of the National Historic Preservation Act and any adverse effects to cultural resources would need to be resolved per the Programmatic Agreement for the B2H Project.

COMMENT(S)

RESPONSE(S)

B4 Burnt River Ranch – March 19, 2015 [1] (cont.)

spring and early summer. We have Wild Turkeys, Canada Geese, Ducks, Pheasant, Chucker, and Quail that all nest and raise their young all in the path of this powerline route.

Deer, Antelope, and Elk also are here in numbers.

My comments are not meant to rant and rave but rather to point out that we see only negatives in this project, there are no positives for us.

Sincerely,

Doug Shook

4

COMMENT(S)

RESPONSE(S)

B4 Burnt River Ranch – March 19, 2015 [1] (cont.)

Douglas Shook
Landlin 541-877-2000
Email raeannvanarsdall@gmail.com
Tax lots: three affected
11S42E03200, 11S42E03500,11S42E03600

Burnt River Ranch
31116 Burnt River Canyon Lane
Durkee, OR 97905
Private land condemned by the
Burnt River Mountain Alternative

Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."
comment@boardmantohemingway.com
Vale District Office
100 Oregon Street, Vale, Oregon 97918
P.O. Box 655, Vale, Oregon 97918

Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

Statement: I am 68 years old, and a veteran of the US Army, having served in Vietnam. The Burnt River Mountain Alternative is unacceptable and fatally harmful to our environment, our community and our local economy. It will affect me, my community and the future generations of my family and our privately owned land that I've worked so hard to build and protect. The Draft EIS underestimated the effect of the Burnt River Mountain Alternative, by neglecting to provide an adequately fair and balanced report. Evidence of where it failed to account for both Environmental and Economic impacts made by this alternative is clear and detailed in each of the topics included in, but not limited to, the items listed below – and in every aspect of the EIS. There is also a blatant lack of purpose and need for this project, evident in all topics and chapters throughout the EIS.

Visual effect is one subject we are told we cannot use in our comments though BLM uses it extensively. They had a man make a study and presentation to us at a town meeting in Baker City on the visual effect of the power line and how it can be lessened for the view from the freeway by going across our ranch. Also crossing our land it would not have a negative visual effect on BLM land in the Burnt River canyon.

My concern is not for the long-haul truck driver on I-84 but for myself, my wife, my daughter, my son in law, my granddaughter, and my grandson. All of whom live and work on this ranch in a family owned business. And our paying guests who come here to enjoy the beauty of this land and our western life style.

Living under and looking up at a powerline corridor day in and day out for the rest of our lives is not an option we accept.

At no time did the BLM or Idaho Power ever ask for permission nor at any time did we give permission for them to use our private land for their private use. I find this kind of business attitude unacceptable and offensive.

Don Gonzoles with BLM visited our ranch and was shown where the line is proposed. I then showed him an alternate route of my choosing to the west of our deeded ground on BLM land that would cross the Burnt River canyon at a narrow part, barely visible to the public and continue south on dry range land avoiding sage grouse habitat and thereby staying off valuable farm ground and not disrupting the social and economic balance of the Durkee Valley. Mr Gonzoles noted this.

Lack of purpose and need
It is clear that neither the applicant, nor the state of Idaho has had a significant enough growth to warrant this powerline and would be at best ten or more years out. This means to me that there is no real need to build this line. The present administration in Washington DC is trying to bolster a failed presidency using Idaho politicians to push through this part of a power grid improvement though there is no real need for it.

COMMENT(S)

RESPONSE(S)

B4 Burnt River Ranch – March 19, 2015 [1] (cont.)

Reference to EIS: Summary, S-2, Line 5 to 8

Idaho Power has proposed and thoroughly studied a preferred route through Baker Co. following the energy corridor already in place. BLM has suggested alternate routes by drawing arbitrary lines on maps that have not been thoroughly studied for environmental and economic impact to the extent the preferred route was. This makes an unbalanced judgement of the impacts to us, the land owners directly affected by the Burnt River Mt. alternative.

In light of the lack of study of environmental and economic impact of those of us affected on this route, and the lack of permission ask for or given, and the lack of real need for the powerline at all, crossing our land is not an option available to them.

If Idaho Power insists on building a project with no real need the route should cross Burnt River canyon west of Sinker Creek, west of our deeded ground, and continue south from there on dry range land.

Our neighboring ranches agree that this route would be far less damaging than crossing more highly valued irrigated farm land.

Economic impact
Our ranch is not only a working cattle ranch but also a guest ranch registered with the State of Oregon as Burnt River Guest Ranch. Agri-tourism is and has always been our main focus. We strongly feel that having a high voltage powerline corridor through the very heart of our ranch would be devastating to our family owned business. The existence of a powerline would devalue and deface our ranch property to the point that agri-tourism would be jeopardized making it impossible to run a profitable business.

Historic cultural impact
Rock cairns exist in the path of the Burnt River Mt. alternative. They are important to the history of Baker Co. whether they are Native American or Basque sheep herder in origin. The fact that they were not known of by the BLM or Idaho Power is another example of lack of study done on the alternate routes compared to the preferred route.

Environmental impacts
Environmental impacts on our ranch alone involve Big Horn sheep that not only graze here but are here during the rut season in the fall and lambing in the spring. Bald Eagles and Golden Eagles are here in pairs during the spring and early summer. We have Wild Turkeys, Canada Geese, Ducks, Pheasant, Chucker, and Quail that all nest and raise their young all in the path of this powerline route.
Deer, Antelope, and Elk also are here in numbers.

My comments are not meant to rant and rave but rather to point out that we see only negatives in this project, there are no positives for us.

Sincerely,

Doug Shook

COMMENT(S)

RESPONSE(S)

B5 Burnt River Ranch – March 19, 2015 [2]

comment@boardmantohemingway.com

From: raeannvanarsdall@gmail.com on behalf of Raeann VanArsdall <raeann@mommag.com>
Sent: Thursday, March 19, 2015 5:29 PM
To: comment@boardmantohemingway.com
Subject: Delaney Van Arsdall - EIS B2H comments attached
Attachments: B2H EIS Comments_DV_March 2015.pdf

My comments regarding the EIS B2H comments are in the attached PDF file.

Delaney Van Arsdall
541-908-2361
raeannvanarsdall@gmail.com

Text-only copy below, secondary to attached.

Delaney Van Arsdall
Cell 541-908-2361
Email raeannvanarsdall@gmail.com
Tax lots: three
11S42E03200, 11S42E03500, 11S42E03600

Burnt River Ranch
31116 Burnt River Canyon Lane
Durkee, OR 97905
affected Private land condemned by the
Burnt River Mountain Alternative

Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."
comment@boardmantohemingway.com
Vale District Office
100 Oregon Street, Vale, Oregon 97918
P.O. Box 655, Vale, Oregon 97918
Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

B5a Statement: I am 15 years old and I am directly affected by the B2H line, today and in the future as the next generation of land owner and rancher in the Burnt River Valley in Durkee. The EIS written about the B2H, and specifically the Burnt River Mountain Alternative is an unfair and unbalanced report and should not be considered acceptable.

Purpose and need
The agency has not provided substantive support or stated their purpose and need for the project. The applicant has not demonstrated a need. There is a clear lack of purpose and need for this project. Any potential purpose and need are too narrow, unduly constraining the range of alternatives considered by the agency. The overall economic burden and burden on other uses is high and the applicant's need is low, which clearly tips the scales in favor of the no action alternative.
Reference to EIS: Summary, S-2, Lines 5 to 8
The B2H Project is neither required to support any particular new power generation project nor justified by any particular existing power generation project. Rather, the B2H Project would meet IPC's obligations to meet Federal Energy Regulatory Commission, Oregon Public Utility Commission, and the Idaho Public Utility Commission requirements.
Statements showing lack of need, made by agency staff
There has never been a statement made with examples of what this line will be used for, or its benefits. When asked directly, Donald Gonzales from BLM responded.
Question asked by me in person on our property, and again by my family in a meeting in Durkee:
"If a need for use and benefits can be stated clearly, illustrating how this B2H line will benefit me, my family, my business, my community, my county, my state or even my country – perhaps we could fairly discuss the project and determine how to mitigate environmental and economic challenges. What are the benefits?"
Donald Gonzales responded that the benefits are not clear. There may be a fire department added in Baker City, Oregon. But the local benefits to your community or your family cannot be described. The need for this cannot be described.
Decisions by agencies for public land right of way. There is unfair and unbalanced lack of research and support to determine the need or grant right-of-way on my privately owned land.
There is no reference to who makes decisions regarding authorizing the use of my land that I manage.
Reference to EIS: Summary, S-3, Line 1 – The BLM will decide whether or not to grant the requested right-of-way on public lands.
Reference to EIS: Summary, S-3, Line 5 – The USFS will decide whether to grant a special-use authorization on National Forest System lands.

1

B5a Comment noted. Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

COMMENT(S)

RESPONSE(S)

B5 Burnt River Ranch – March 19, 2015 [2] (cont.)

Reference to EIS: Summary, S-3, Line 18 – Other federal agencies may rely on the Draft EIS and Final EIS to make decisions regarding authorizing the use of lands they manage.
Lack of information to make determinations
Agency and applicant fail to provide enough information about the project to allow private land owners such as myself to make a decision on what the exact impact will be on our private property, our business and our community. We were not able to analyze potential impacts of the decision due to the lack of information.
Items that may cross and impede our land, but have not been detailed, include high voltage lines, towers, helicopter landing zones, and items that I cannot possible understand or foresee. Representatives from the applicant and from a wide variety of agencies who have trespassed onto our property for their unannounced studies and research have mentioned these options and countless others. This makes it impossible for us to determine the exact financial or environmental impact, and therefore state or defend our stance on the EIS.
Addressing alternatives
There were important practical and feasible alternatives the agency did not include.
Alternative Considered But Eliminated From the Detailed Analysis
Reference to EIS: Page 2-66, 2.4, Line 20
A proposed action may be considered but eliminated from detailed analysis if: It is ineffective (it would not respond to BLM's purpose and need). The agency has failed to do a balanced and fair determination on the Burnt River Mt. Alternative because there is no agency statement of purpose and need for this project.
The agency failed to consider an alternative that would have placed the transmission line more significantly on BLM property. Placing the transmission line less than five miles to the west, crossing Burnt River Canyon west of Sinker Creek, west of our deeded ground, and continuing south on dry land would alleviate the burden on multiple private land owners. It would be practical because that BLM ground is dry land that will not be impacted by the line. It would also be feasible because the line would not visible to travelers wanting to admire the landscape or private land residents. The cumulative impact of this siting would be less because it would have less economic impact on neighboring owners, while any concerns regarding habitat impacts – if they exist – could be addressed through mitigation.
Reference to EIS: Summary, S-11, Figure S-4
The Burnt River Mt. Alternative is unfairly weighted on private land.
The agency failed to provide a fair and balanced alternative route along the Burnt River Mt. Alternative. The burden on private land owners is considerably unbalanced. Of the 16.8 miles, 73% is on private land, and only 27% on public land. Nearly 10% of that line is on our private property alone.
Reference to EIS: Summary, S-10, Line 31
There was a complete lack of mitigation allowed in this decision, because there is a very clear option on public land less than five miles to the west of our private ground, which would also avoid nearly all of our neighbors along this Alternative. The points of crossing our private land, and that of our neighbors, are not inconsequential. The line crosses the heart of our property and of our irrigated ground, which directly affects more than 35%of our property and more than 50% of our irrigated ground. This is an unfair, unbalanced and unacceptable burden.
Agency staff comments:
In conversation with Donald Gonzales (Vale BLM), this option was dismissed during a road trip with us because he determined from the road (Burnt River Canyon Lane) that the terrain could be steep for construction. He and his agency are not engineers, and viewing from this road is an unfair determination. We ride and drive the BLM above the road on a weekly basis and are well versed in the terrain. All areas are easily accessed by vehicle, when accessed through deer creek and wood gulch. We often haul large livestock trailers, as well as water and fence construction materials without problem.
Affected Environment – Direct and Indirect Environmental Consequences
For purposes of the affected environment and environmental consequences, environment includes the broad biological, physical, social, and economic elements of the environment.
Environmental Resources impacted
The agency failed to provide a fair and balanced report on the environmental impact caused by Burnt River Mt. Alternative.
Existing environment – The EIS does not describe or show an understanding of the existing condition and trend of the environmental attributes that could be impacted by the proposed action or alternatives, specifically on the Burnt River Mountain Alternative. It is obvious there is a severe lack of resources to create a clear understanding of the environment as it is now, let alone a fair and balanced impact statement on how that can be affected by the project.
Earth resources – The agency failed to adequately research the environmental impact that the Burnt River Mt. Alt. will have on irrigated land and soils. The Burnt River Valley is very fertile, with Class I and Class II soils supporting and maintaining the agricultural stability of the private land owners and the community as a whole. Inadequate research or reporting has been done to determine the impact the construction of roads, towers, lines, etc. will have on those soils. Top soils are not deep, and on our property alone we are careful not to harm the top soil and soils permanently with light ATV vehicles, animal movement or overgrazing. We never drive heavy equipment on these irrigated soils because they cause permanent damage. Construction will have direct irreparable damage impact to that soil. Soil damage creates a long-term, high-intensity impact on a permanent basis.
Reference to EIS: Chapter 3.1.2.1, page 3-6, Line 15: Long-term, High-intensity impact—could cause substantial change or stress to an environmental resource.
Reference to EIS: Chapter 3, page 3-10, Line 9: Soil characteristics in the analysis area, such as soil erosion and compaction, soil suitability for reclamation, and soil resources that could be removed from productivity
Reference to EIS: Chapter 3, page 3-13, Lines 1-14: There is a plan to manage soils for public lands, but nowhere is it stated who will be managing protection of soils for private land owners, specifically on irrigated ground. This puts a huge imbalance of burden on private land owners, who do not possess the resources to protect themselves or their resources. The economic impact caused by soil damage will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by

2

COMMENT(S)

RESPONSE(S)

B5 Burnt River Ranch – March 19, 2015 [2] (cont.)

more than 50%, and therefore our income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay
for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.
Water resources – The agency failed to adequately research the environmental impact on our water systems along the Burnt River Mt. Alt.
The information is completely unbalanced with that done for the Proposed Action. Reference to EIS: Chapter 3.2.2.3, page 3-65, Line 15-16: Would project construction, operations, and maintenance affect groundwater levels, 16 contamination, or ability to recharge (especially as it relates to potential blasting)?
Reference to EIS: Chapter 3, page 3-71, Table 3-19. Surface Water Resources in the Analysis Area by County and Ownership:
The agency failed to adequately provide balanced environmental research on the amount of streams impacted in Baker County that are unfairly burdened on private land owners rather than on public lands. Of the 368 miles of impacted streams, 254 miles (70%) of private land streams will be impacted, compared to 57 miles (6%) of streams on the BLM public lands.
The economic impact caused by stream damage to drinking water and damage to irrigation systems on two irrigation districts (we are the headgate for both irrigation districts in the Burnt River valley) will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by more than 50%, and therefore our annual income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of cattle pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.
Vegetation resources – The agency failed to adequately research the environmental impact on the vegetation resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action.
Wildlife resources – The agency failed to adequately research the environmental impact on the wildlife resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. The lack of research is event in the lack of correct information in reporting the current environmental situation.
Big game reported in this area includes mule deer, white-tailed deer, elk and big horn sheet. It omits antelope which are significantly prevalent. The EIS also lists that cliffs and talus areas are primarily utilized by the Big horn sheep. Yet the grasslands directly under the proposed Burnt River Mt. Alt. are the primary rutting grounds for the big horn sheep. These omissions of basic wildlife information, available from discussions with locals (and anyone driving on that road) clearly illustrates the lack of adequate research for this alternative. Reference to EIS: Summary, 3-257, Line 16.
Impact on the rutting and mating ground on our property for big horn sheep, bald eagles, and mule deer. There a photos of the big horn sheep herd during the rut at the proposed line site. The big horn sheep specifically gather during the rut in the grassland dry field on the north side of the road, across from our irrigated ground and in the line of the Burnt River Mt. Alt., which is also used during the mule deer and white tail deer rut season. The bald eagles mate annually in and among the trees along the Burnt River directly along the line. We have witnessed them annual for more than five years.
Visual resources – The agency failed to fairly and in a balanced manner research or report the environmental impact caused by the presence of large transmission towers. They will permanently damage visual resources, on both public and private ground. Reference to EIS: Summary, S-22, Line 10. Currently, the Burnt River Valley is picturesque, from the intersection of Hwy 30, throughout the valley, into the canyon and out the other side near Hereford. Residents of Baker County and beyond always exclaim when they learn where our home and Agri-tourism business is located, "That's one of the most beautiful locations in the state. I know exactly where that is. My family has visited that area for generations to hunt, gold mine, camp, explore…" This illustrates the strong historical and visual resource this valley and canyon are to the community and to the state of Oregon. On the public ground portion, mention has been made that it is zoned as a visual protected. We argue that that zone extends to
our private ground as well, and cannot be destroyed by "the presence of large transmission towers…" which would be blatantly seen on our open property, as opposed to the steep canyon within the zoned area, which would merely show lines – the towers would not be visible from the road. As it's currently placed, the towers and lines would impede the visual resources for my family (directly in front of our home window), our community, as well as for the citizens who travel to the Burnt River Canyon to enjoy its beauty – in both directions, as they are coming and going.
The agency failed to fairly and in a balanced manner research or report the economic impact caused by damaged visual resources. The long-term economic impact created by the presence of large transmission towers will permanently damage visual resources, and therefore permanently impact our Agri-tourism business. Reference to EIS: Summary, S-22, Line 10. Our alternant source of income is Agri-tourism, where paying guests visit our ranch to view the visual beauty that this Oregon destination has to offer, and experience the culture of the western and cowboy lifestyle still alive in this community. We have been building this business for more than five years, and continue to grow. This business will no longer exist with the Burnt River Mt. Alt. lines traversing our property. We will be long-term, permanently driven out of business. The fact is that tourists will not pay to look at, sleep under, or be active around the line. It's not pretty – and the fear of potential danger will further drive business away.
"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission
Cultural Resources – Reference to EIS: Summary, S-22, Line 15. And Summary, S-23, Table S-4
Example of cultural resources not researched
One example is the existence of historic Cairns within eye view and very close to the line. If I am able to collect and provide these detailed examples, the amount of undiscovered historical artifacts that would be disturbed by the construction and on-going existence of the B2H lines has clearly not been sufficiently researched. We are not professionals and we collected the following data within a week's time.

- Evidence: Photos of rock structures called cairns are attached.
- Location: Map of location is attached.

3

COMMENT(S)

RESPONSE(S)

B5 Burnt River Ranch – March 19, 2015 [2] (cont.)

• Personal interviews: We interviewed a local man who hunts and camps in the Burnt River Canyon frequently. He is a native descendant of the Nez Perce tribe and visits here to connect with his ancestors. He described the important of this canyon, the river, and the rocks to his ancestors. He explained that burials exist along the canyon and surrounding areas in the rock crevices. And that many cairns – rock structures – exist for hundreds of miles to use as "road signs" to direct people to the great gathering, trading and grazing area of the Burnt River Canyon and Valley. They are visible atop the peaks along the historical route. The visual impact the B2H lines create would be devastating and permanent.
Lack of follow-up on existing knowledge, example
Appendix A—Government-to-Government Tribal Consultation, on October 24, 2013 an email To: Renee Straub, Jennifer Theisen, and Shane Baker From: Catherine Dickson states:
"Concern with rock features reported by private land owners. Jennifer called the landowners and followed up with IPC; however the site, to date, has not been verified."
We did not receive interaction or have the opportunity to comment, as private land owners mentioned in the above email. At the meeting in Durkee, Doug Shook invited the BLM archeologist to take a tour either in ATVs or horseback to view and photograph the structures. No response was received and no visit was made. He acquired the attached photos himself.
Unbalanced scores, and lack of quality research
Reference to EIS: Summary, S-23, Table S-4
Burnt River Mountain Alternative has a "HIGH" Potential Impact Assessment; even though scores were based on RLS/Class I index scores only. Index scores could not be combined for those alternatives because no Class II survey was conducted along either the Proposed Action or alternative route.
Chapter3 – Land use and Agriculture
Agriculture: The agency failed to fairly and in a balanced manner research or report the environmental impact on agriculture by claiming that damage created by construction would be temporary and restricted to the areas of construction. Soil damage, as noted above, will be permanent. Refer to the soil comment above. Staff members trespassing on our private ground to conduct research stated in personal conversations that they were surveying the area for possible construction sites. They stated that to build a tower, plan to see damage done spread over five to ten times what is actual space needed for the actual structure, plus additional for access roads for large equipment. This lack of information provided does not allow me to make an accurate evaluation of what the level of damage will be, and the agency cannot either.
Reference to EIS: 3.2.6.3, 3-441, Lines 28-32: …could temporarily disrupt agricultural operations in the vicinity of construction…
The impact on this community and of the landowners is misrepresented.
The economic harm to my operation was not adequately characterized in the EIS because the unbalanced representation of private land owners and on the Burnt River Mt. Alt. is clear. On my farm alone I have invested $200,000 in improvements and structures that will be impacted by the transmission lines. The EIS does not account for those investments
Property Values Reference to EIS: Chapter 3, 3-922. Line 20
Approximately 71 percent of the land that would be crossed by the proposed B2H Project is privately 22 owned. The majority of land is owned privately, yet the agency has the decision making power, though they own only 22 percent of the impacted property. This burden is completely biased and must be made a fair playing field. This section is titled property values, though values are not discussed. There is a clear drop in property value. From my own personal experience, I purchased property with a powerline tower on it ten years ago. Because of the structure and lines, I negotiated a 35% drop in price, even though the structure was not visible from the home. I will not be able to retain my home, my business or my property when my property value drops by 35%. This big of a loss taken by land owners – combined with the complete imbalance of private vs. public lands and the decision being placed in the hands of agencies, and completely out of the hands of land owners is not acceptable.
Socioeconomic
Reference to EIS: Chapter 3, 3-897
To impact the economic income and livelihood of a community primarily made of land owners who are senior citizens and women is unethical and unaccounted for in the EIS. On our land, business alone:
Discrimination example: this three-generation business is owned by:
- women: grandmother, mother and daughter
- senior citizens: grandparents, sole source of income ages 71 and 68
- veteran: grandfather was Army Special Forces, served in Vietnam
Livability: Our current home site was built in 1922 and has been inhabited consistently since then, is directly impacted by the transmission lines, and our proposed new second home building site, construction to start in May
2015, is directly under the line. Example of insufficient information demonstrated by BLM staff at the Vale office on the phone said they needed to look up our property before discussing it, quote from Renee Straub (BLM Vale) "We did not know that anyone lived there – that there was a residence on that property."
Recreation and Tourism Reference to EIS: Chapter 3, 3-94. Line 26
This unbalanced level of research and reporting is clear when referring to recreation and tourism. Recreational events are listed, but tourism is not addressed. The economic impact on tourism is long term and permanent because the towers and lines are a permanent eyesore. In my business alone, we will lose long-time customers and the potential for any new customers. These eyesores will ruin tourism in our valley, permanently.
Public Health and Safety
Our home is in direct eye sight of the Burnt River Mountain Alternative, and is in very close proximity. Our proposed building site, beginning March 2015 is directly under the line. Our business operation requires that we operate directly under the line on a daily bases to irrigate, ride, check cattle, calve, feed, manage the stack yard, fix fences, and conduct Agri-tourism activities. These are all affected by the line in a negative way.

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COMMENT(S)

RESPONSE(S)

B5 Burnt River Ranch – March 19, 2015 [2] (cont.)

Noise Reference to EIS: Chapter 3, 3-953. Line 11
The agency failed to provide fair and balanced research along the Burnt River Mt. Alt – made evident in the noise research done along the road in at private residences of our neighbors, but never near our home or near the line location on our property. Other residences where tests were held are much further from the line than ours. Yet no testing was done on our property, or at our residence, which is .5 mile from the right of way.
Reference to EIS: Chapter 3, 3-953. Line 11 To analyze noise impacts, all structures within 0.5 mile of the edge of the proposed right-of-way were inventoried. The evaluation of noise energy created by the B2H Project involves an identification of the existing or ambient sound levels followed by a prediction of the future sound levels attributed to the B2H Project.
We called the BLM office and Vale to ask why we were not included in this testing, and were told that they were unaware of a residence on this property. We are on their mailing list and property address obviously public information. We are on their list of property owners. This blatant lack of research and knowledge make this EIS unfair and unbalanced for lack of resources, and lack of correct information.
Electrical Environment Reference to EIS: Chapter 3, 3-961. Line 24
Electrical fields will interfere or cause harm to nearby metal objects, such as vehicles, animal feeders, watering stations, or other equipment and fences. Personal experience: I have lived and raised and managed livestock under powerlines in Umatilla and Morrow counties previously. My personal experience shows that metal objects listed above do carry voltage and will shock people – I have been shocked from a metal livestock trailer – and livestock.
The line on the Burnt River Mt. Alt. that runs over our property crosses a large portion of irrigated ground where we flood irrigate by hand. Operating daily during the summer in live water with power lines overhead – along with my family and children – creates extreme fear.
Field Induction (Induced Currents and Nuisance Shocks) Reference to EIS: Chapter 3, 3-980. Line 9
Electromagnetic Interference to Cardiac Pacemakers Reference to EIS: Chapter 3, 3-986. Line 35
Human Health Effects of EMF Reference to EIS: Chapter 3, 3-987. Line 27
The fear of potential electrical fields effecting or causing harm to people, livestock, wildlife – will have a permanent effect on our business and our livelihood as an Agri-tourism business. Tourists do not want to pay to stay so near transmission lines, and will be driven away due to fear. This economic impact will be permanent, long-term and irreparable.
"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission Lines
Link = http://headwaterseconomics.org/library/files/AppraisalGroupOne;ValuationGuidelines.pdf
Chapter 4 – Consultation and Coordination
The list of agencies and organizations consulted, and the cooperation shown to protect those they represent is evident. Those all represent mostly public lands, which make up approximately 23%of the line. The other 77% of the line impacts private land owners. The EIS is unbalanced and unfair because it does not describe who is protecting and coordinating in the interest of private land owners. Nor does it describe an equal amount of planning to incorporate the private land owners into the process to learn and glean important information needed to be informed about 77% of the land where the line will run. Nor does it address attempts to mitigate situations that may arise in that process.
Harmful personal agency staff comments
I was told by Donald Gonzales (Vale BLM), during a personal visit to my property. "Do not get an attorney. It will be very expensive and complicate the process even further. At this point it's just not a good idea, and a waste of money for you." This advice is extremely harmful to our situation because the EIS is an incredibly complicated document, as is the commenting procedure. This suggestion not to seek legal guide has deeply hurt our ability to state our situation and provide comments within the official guidelines.
Mitigation
I am a land owner and I am open to mitigation on the location the line, as it pertains to my privately owned land, and ways to alleviate the many detrimental items listed above. I have seen a lack of willingness to mitigate these items from the agency, as many of the items listed above have been discussed in length with the agency and are omitted from the EIS, specifically related to the Burnt River Mountain Alternative.

5

ATTACHMENT

B5 Burnt River Ranch – March 19, 2015 [12] (cont.)

Delaney Van Arsdall
Cell 541-908-2361
Email raeannvanarsdall@gmail.com
Tax lots: three affected
11S42E03200, 11S42E03500,11S42E03600

Burnt River Ranch
31116 Burnt River Canyon Lane
Durkee, OR 97905
Private land condemned by the
Burnt River Mountain Alternative

Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."
comment@boardmantohemingway.com
Vale District Office
100 Oregon Street, Vale, Oregon 97918
P.O. Box 655, Vale, Oregon 97918

Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

Statement: I am 15 years old and I am directly affected by the B2H line, today and in the future as the next generation of land owner and rancher in the Burnt River Valley in Durkee. The EIS written about the B2H, and specifically the Burnt River Mountain Alternative is an unfair and unbalanced report and should not be considered acceptable.

Purpose and need
The agency has not provided substantive support or stated their purpose and need for the project. The applicant has not demonstrated a need. There is a clear lack of purpose and need for this project. Any potential purpose and need are too narrow, unduly constraining the range of alternatives considered by the agency. The overall economic burden and burden on other uses is high and the applicant's need is low, which clearly tips the scales in favor of the no action alternative.

Reference to EIS: Summary, S-2, Lines 5 to 8
The B2H Project is neither required to support any particular new power generation project nor justified by any particular existing power generation project. Rather, the B2H Project would meet IPC's obligations to meet Federal Energy Regulatory Commission, Oregon Public Utility Commission, and the Idaho Public Utility Commission requirements.

Statements showing lack of need, made by agency staff
There has never been a statement made with examples of what this line will be used for, or its benefits. When asked directly, Donald Gonzales from BLM responded.
Question asked by me in person on our property, and again by my family in a meeting in Durkee:
"If a need for use and benefits can be stated clearly, illustrating how this B2H line will benefit me, my family, my business, my community, my county, my state or even my country – perhaps we could fairly discuss the project and determine how to mitigate environmental and economic challenges. What are the benefits?"
Donald Gonzales responded that the benefits are not clear. There may be a fire department added in Baker City, Oregon. But the local benefits to your community or your family cannot be described. The need for this cannot be described.

Decisions by agencies for public land right of way. There is unfair and unbalanced lack of research and support to determine the need or grant right-of-way on my privately owned land.
There is no reference to who makes decisions regarding authorizing the use of my land that I manage.
Reference to EIS: Summary, S-3, Line 1 – The BLM will decide whether or not to grant the requested right-of-way on public lands.

ATTACHMENT

B5 Burnt River Ranch – March 19, 2015 [12] (cont.)

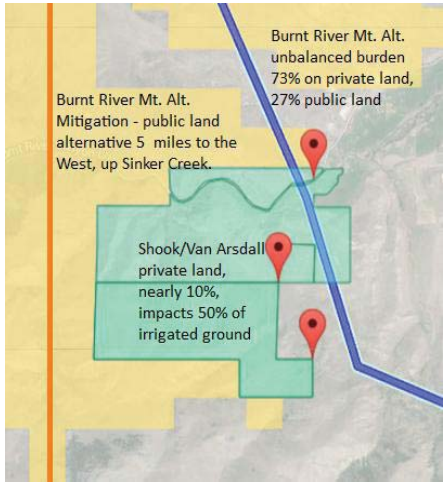
Reference to EIS: Summary, S-3, Line 5 – The USFS will decide whether to grant a special-use authorization on National Forest System lands.
Reference to EIS: Summary, S-3, Line 18 – Other federal agencies may rely on the Draft EIS and Final EIS to make decisions regarding authorizing the use of lands they manage.

Lack of information to make determinations
Agency and applicant fail to provide enough information about the project to allow private land owners such as myself to make a decision on what the exact impact will be on our private property, our business and our community. We were not able to analyze potential impacts of the decision due to the lack of information. Items that may cross and impede our land, but have not been detailed, include high voltage lines, towers, helicopter landing zones, and items that I cannot possible understand or foresee. Representatives from the applicant and from a wide variety of agencies who have trespassed onto our property for their unannounced studies and research have mentioned these options and countless others. This makes it impossible for us to determine the exact financial or environmental impact, and therefore state or defend our stance on the EIS.

Addressing alternatives
There were important practical and feasible alternatives the agency did not include.

Alternative Considered But Eliminated From the Detailed Analysis
Reference to EIS: Page 2-66, 2.4, Line 20
A proposed action may be considered but eliminated from detailed analysis if: It is ineffective (it would not respond to BLM's purpose and need). The agency has failed to do a balanced and fair determination on the Burnt River Mt. Alternative because there is no agency statement of purpose and need for this project.

The agency failed to consider an alternative that would have placed the transmission line more significantly on BLM property. Placing the transmission line less than five miles to the west, crossing Burnt River Canyon west of Sinker Creek, west of our deeded ground, and continuing south on dry land would alleviate the burden on multiple private land owners. It would be practical because that BLM ground is dry land that will not be impacted by the line. It would also be feasible because the line would not visible to travelers wanting to admire the landscape or private land residents. The cumulative impact of this siting would be less because it would have less economic impact on neighboring owners, while any concerns regarding habitat impacts – if they exist – could be addressed through mitigation.
Reference to EIS: Summary, S-11, Figure S-4



The Burnt River Mt. Alternative is unfairly weighted on private land.
The agency failed to provide a fair and balanced alternative route along the Burnt River Mt. Alternative. The burden on private land owners is considerably unbalanced. Of the 16.8 miles, 73% is on private land, and only 27% on public land. Nearly 10% of that line is on our private property alone.
Reference to EIS: Summary, S-10, Line 31
There was a complete lack of mitigation allowed in this decision, because there is a very clear option on public land less than five miles to the west of our private ground, which would also avoid nearly all of our neighbors along this Alternative. The points of crossing our private land, and that of our

ATTACHMENT

B5 **Burnt River Ranch – March 19, 2015 [12] (cont.)**

neighbors, are not inconsequential. The line crosses the heart of our property and of our irrigated ground, which directly affects more than 35%of our property and more than 50% of our irrigated ground. This is an unfair, unbalanced and unacceptable burden.

Agency staff comments:
In conversation with Donald Gonzales (Vale BLM), this option was dismissed during a road trip with us because he determined from the road (Burnt River Canyon Lane) that the terrain could be steep for construction. He and his agency are not engineers, and viewing from this road is an unfair determination. We ride and drive the BLM above the road on a weekly basis and are well versed in the terrain. All areas are easily accessed by vehicle, when accessed through deer creek and wood gulch. We often haul large livestock trailers, as well as water and fence construction materials without problem.

Affected Environment – Direct and Indirect Environmental Consequences
For purposes of the affected environment and environmental consequences, environment includes the broad biological, physical, social, and economic elements of the environment.

Environmental Resources impacted
The agency failed to provide a fair and balanced report on the environmental impact caused by Burnt River Mt. Alternative.

Existing environment – The EIS does not describe or show an understanding of the existing condition and trend of the environmental attributes that could be impacted by the proposed action or alternatives, specifically on the Burnt River Mountain Alternative. It is obvious there is a severe lack of resources to create a clear understanding of the environment as it is now, let alone a fair and balanced impact statement on how that can be affected by the project.

Earth resources – The agency failed to adequately research the environmental impact that the Burnt River Mt. Alt. will have on irrigated land and soils. The Burnt River Valley is very fertile, with Class I and Class II soils supporting and maintaining the agricultural stability of the private land owners and the community as a whole. Inadequate research or reporting has been done to determine the impact the construction of roads, towers, lines, etc. will have on those soils. Top soils are not deep, and on our property alone we are careful not to harm the top soil and soils permanently with light ATV vehicles, animal movement or overgrazing. We never drive heavy equipment on these irrigated soils because they cause permanent damage. Construction will have direct irreparable damage impact to that soil. Soil damage creates a long-term, high-intensity impact on a permanent basis.
Reference to EIS: Chapter 3.1.2.1, page 3-6, Line 15: Long-term, High-intensity impact—could cause substantial change or stress to an environmental resource.
Reference to EIS: Chapter 3, page 3-10, Line 9: Soil characteristics in the analysis area, such as soil erosion and compaction, soil suitability for reclamation, and soil resources that could be removed from productivity
Reference to EIS: Chapter 3, page 3-13, Lines 1-14: There is a plan to manage soils for public lands, but nowhere is it stated who will be managing protection of soils for private land owners, specifically on irrigated ground. This puts a huge imbalance of burden on private land owners, who do not possess the resources to protect themselves or their resources.
The economic impact caused by soil damage will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by more than 50%, and therefore our income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.

ATTACHMENT

B5 Burnt River Ranch – March 19, 2015 [12] (cont.)

Water resources – The agency failed to adequately research the environmental impact on our water systems along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. Reference to EIS: Chapter 3.2.2.3, page 3-65, Line 15-16: Would project construction, operations, and maintenance affect groundwater levels, 16 contamination, or ability to recharge (especially as it relates to potential blasting)?

Reference to EIS: Chapter 3, page 3-71, Table 3-19. Surface Water Resources in the Analysis Area by County and Ownership:
The agency failed to adequately provide balanced environmental research on the amount of streams impacted in Baker County that are unfairly burdened on private land owners rather than on public lands. Of the 368 miles of impacted streams, 254 miles (70%) of private land streams will be impacted, compared to 57 miles (6%) of streams on the BLM public lands.

The economic impact caused by stream damage to drinking water and damage to irrigation systems on two irrigation districts (we are the headgate for both irrigation districts in the Burnt River valley) will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by more than 50%, and therefore our annual income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of cattle pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.

Vegetation resources – The agency failed to adequately research the environmental impact on the vegetation resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action.

Wildlife resources – The agency failed to adequately research the environmental impact on the wildlife resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. The lack of research is event in the lack of correct information in reporting the current environmental situation. Big game reported in this area includes mule deer, white-tailed deer, elk and big horn sheet. It omits antelope which are significantly prevalent. The EIS also lists that cliffs and talus areas are primarily utilized by the Big horn sheep. Yet the grasslands directly under the proposed Burnt River Mt. Alt. are the primary rutting grounds for the big horn sheep. These omissions of basic wildlife information, available from discussions with locals (and anyone driving on that road) clearly illustrates the lack of adequate research for this alternative.
Reference to EIS: Summary, 3-257, Line 16.
Impact on the rutting and mating ground on our property for big horn sheep, bald eagles, and mule deer. There a photos of the big horn sheep herd during the rut at the proposed line site. The big horn sheep specifically gather during the rut in the grassland dry field on the north side of the road, across from our irrigated ground and in the line of the Burnt River Mt. Alt., which is also used during the mule deer and white tail deer rut season. The bald eagles mate annually in and among the trees along the Burnt River directly along the line. We have witnessed them annual for more than five years.

Visual resources – The agency failed to fairly and in a balanced manner research or report the environmental impact caused by the presence of large transmission towers. They will permanently damage visual resources, on both public and private ground. Reference to EIS: Summary, S-22, Line 10. Currently, the Burnt River Valley is picturesque, from the intersection of Hwy 30, throughout the valley, into the canyon and out the other side near Hereford. Residents of Baker County and beyond always exclaim when they learn where our home and Agri-tourism business is located, "That's one of the most beautiful locations in the state. I know exactly where that is. My family has visited that area for generations to hunt, gold mine, camp, explore…" This illustrates the strong historical and visual resource this valley and canyon are to the community and to the state of Oregon. On the public ground portion, mention has been made that it is zoned as a visual protected. We argue that that zone extends to our private ground as well, and cannot be destroyed by "the presence of large transmission towers…" which would be blatantly seen on our open property, as opposed to the steep canyon within the zoned area, which would merely show lines – the towers would not be visible from the road. As it's currently placed, the towers and lines

ATTACHMENT

B5 **Burnt River Ranch – March 19, 2015 [12] (cont.)**

would impede the visual resources for my family (directly in front of our home window), our community, as well as for the citizens who travel to the Burnt River Canyon to enjoy its beauty – in both directions, as they are coming and going.

The agency failed to fairly and in a balanced manner research or report the economic impact caused by damaged visual resources. The long-term economic impact created by the presence of large transmission towers will permanently damage visual resources, and therefore permanently impact our Agri-tourism business. Reference to EIS: Summary, S-22, Line 10. Our alternant source of income is Agri-tourism, where paying guests visit our ranch to view the visual beauty that this Oregon destination has to offer, and experience the culture of the western and cowboy lifestyle still alive in this community. We have been building this business for more than five years, and continue to grow. This business will no longer exist with the Burnt River Mt. Alt. lines traversing our property. We will be long-term, permanently driven out of business. The fact is that tourists will not pay to look at, sleep under, or be active around the line. It's not pretty – and the fear of potential danger will further drive business away.

"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission

Cultural Resources – Reference to EIS: Summary, S-22, Line 15. And Summary, S-23, Table S-4

Example of cultural resources not researched
One example is the existence of historic Cairns within eye view and very close to the line. If I am able to collect and provide these detailed examples, the amount of undiscovered historical artifacts that would be disturbed by the construction and on-going existence of the B2H lines has clearly not been sufficiently researched. We are not professionals and we collected the following data within a week's time.

- Evidence: Photos of rock structures called cairns are attached.
- Location: Map of location is attached.
- Personal interviews: We interviewed a local man who hunts and camps in the Burnt River Canyon frequently. He is a native descendant of the Nez Perce tribe and visits here to connect with his ancestors. He described the important of this canyon, the river, and the rocks to his ancestors. He explained that burials exist along the canyon and surrounding areas in the rock crevices. And that many cairns – rock structures – exist for hundreds of miles to use as "road signs" to direct people to the great gathering, trading and grazing area of the Burnt River Canyon and Valley. They are visible atop the peaks along the historical route. The visual impact the B2H lines create would be devastating and permanent.

Lack of follow-up on existing knowledge, example
Appendix A—Government-to-Government Tribal Consultation, on October 24, 2013 an email To: Renee Straub, Jennifer Theisen, and Shane Baker From: Catherine Dickson states:
"Concern with rock features reported by private land owners. Jennifer called the landowners and followed up with IPC; however the site, to date, has not been verified."
We did not receive interaction or have the opportunity to comment, as private land owners mentioned in the above email. At the meeting in Durkee, Doug Shook invited the BLM archeologist to take a tour either in ATVs or horseback to view and photograph the structures. No response was received and no visit was made. He acquired the attached photos himself.

Unbalanced scores, and lack of quality research
Reference to EIS: Summary, S-23, Table S-4

ATTACHMENT

B5 Burnt River Ranch – March 19, 2015 [12] (cont.)

Burnt River Mountain Alternative has a "HIGH" Potential Impact Assessment; even though scores were based on RLS/Class I index scores only. Index scores could not be combined for those alternatives because no Class II survey was conducted along either the Proposed Action or alternative route.

Chapter3 – Land use and Agriculture

Agriculture: The agency failed to fairly and in a balanced manner research or report the environmental impact on agriculture by claiming that damage created by construction would be temporary and restricted to the areas of construction. Soil damage, as noted above, will be permanent. Refer to the soil comment above. Staff members trespassing on our private ground to conduct research stated in personal conversations that they were surveying the area for possible construction sites. They stated that to build a tower, plan to see damage done spread over five to ten times what is actual space needed for the actual structure, plus additional for access roads for large equipment. This lack of information provided does not allow me to make an accurate evaluation of what the level of damage will be, and the agency cannot either.
Reference to EIS: 3.2.6.3, 3-441, Lines 28-32: …could temporarily disrupt agricultural operations in the vicinity of construction…

The impact on this community and of the landowners is misrepresented.
The economic harm to my operation was not adequately characterized in the EIS because the unbalanced representation of private land owners and on the Burnt River Mt. Alt. is clear. On my farm alone I have invested $200,000 in improvements and structures that will be impacted by the transmission lines. The EIS does not account for those investments

Property Values Reference to EIS: Chapter 3, 3-922. Line 20
Approximately 71 percent of the land that would be crossed by the proposed B2H Project is privately 22 owned. The majority of land is owned privately, yet the agency has the decision making power, though they own only 22 percent of the impacted property. This burden is completely biased and must be made a fair playing field. This section is titled property values, though values are not discussed. There is a clear drop in property value. From my own personal experience, I purchased property with a powerline tower on it ten years ago. Because of the structure and lines, I negotiated a 35% drop in price, even though the structure was not visible from the home. I will not be able to retain my home, my business or my property when my property value drops by 35%. This big of a loss taken by land owners – combined with the complete imbalance of private vs. public lands and the decision being placed in the hands of agencies, and completely out of the hands of land owners is not acceptable.

Socioeconomic
Reference to EIS: Chapter 3, 3-897
To impact the economic income and livelihood of a community primarily made of land owners who are senior citizens and women is unethical and unaccounted for in the EIS. On our land, business alone:

Discrimination example: this three-generation business is owned by:
- women: grandmother, mother and daughter
- senior citizens: grandparents, sole source of income ages 71 and 68
- veteran: grandfather was Army Special Forces, served in Vietnam

Livability: Our current home site was built in 1922 and has been inhabited consistently since then, is directly impacted by the transmission lines, and our proposed new second home building site, construction to start in May 2015, is directly under the line. Example of insufficient information demonstrated by BLM staff at the Vale office on

COMMENT(S)

RESPONSE(S)

B6 Burnt River Ranch – March 19, 2015 [3]

comment@boardmantohemingway.com

From: raeannvanarsdall@gmail.com on behalf of Raeann VanArsdall <raeann@mommag.com>
Sent: Thursday, March 19, 2015 5:26 PM
To: comment@boardmantohemingway.com
Subject: Jefri Van Arsdall - EIS B2H comments attached
Attachments: B2H EIS Comments_JV_March 2015.pdf

My comments regarding the EIS B2H comments are in the attached PDF file.

Jefri Van Arsdall
541-908-2361
raeannvanarsdall@gmail.com

Text-only copy below, secondary to attached.

Jefri Van Arsdall
Cell 541-908-2361
Email raeannvanarsdall@gmail.com
Tax lots: three
11S42E03200, 11S42E03500, 11S42E03600

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affected Private land condemned by the
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Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."
comment@boardmantohemingway.com
Vale District Office
100 Oregon Street, Vale, Oregon 97918
P.O. Box 655, Vale, Oregon 97918
Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

Statement: The Burnt River Mountain Alternative is unacceptable and fatally harmful to our environment, our community and our local economy. The Draft EIS underestimated the effect of the Burnt River Mountain Alternative, by neglecting to provide an adequately fair and balanced report. Evidence of where it failed to account for both Environmental and Economic impacts made by this alternative is clear and detailed in each of the topics included in, but not limited to, the items listed below – and in every aspect of the EIS. There is also a blatant lack of purpose and need for this project, evident in all topics and chapters throughout the EIS.

B6a

Purpose and need
The agency has not provided substantive support or stated their purpose and need for the project. The applicant has not demonstrated a need. There is a clear lack of purpose and need for this project. Any potential purpose and need are too narrow, unduly constraining the range of alternatives considered by the agency. The overall economic burden and burden on other uses is high and the applicant's need is low, which clearly tips the scales in favor of the no action alternative.
Reference to EIS: Summary, S-2, Lines 5 to 8
The B2H Project is neither required to support any particular new power generation project nor justified by any particular existing power generation project. Rather, the B2H Project would meet IPC's obligations to meet Federal Energy Regulatory Commission, Oregon Public Utility Commission, and the Idaho Public Utility Commission requirements.
Statements showing lack of need, made by agency staff
There has never been a statement made with examples of what this line will be used for, or its benefits. When asked directly, Donald Gonzales from BLM responded.
Question asked by me in person on our property, and again by my family in a meeting in Durkee:
"If a need for use and benefits can be stated clearly, illustrating how this B2H line will benefit me, my family, my business, my community, my county, my state or even my country – perhaps we could fairly discuss the project and determine how to mitigate environmental and economic challenges. What are the benefits?"
Donald Gonzales responded that the benefits are not clear. There may be a fire department added in Baker City, Oregon. But the local benefits to your community or your family cannot be described. The need for this cannot be described.

B6b

Decisions by agencies for public land right of way. There is unfair and unbalanced lack of research and support to determine the need or grant right-of-way on my privately owned land.
There is no reference to who makes decisions regarding authorizing the use of my land that I manage.
Reference to EIS: Summary, S-3, Line 1 – The BLM will decide whether or not to grant the requested right-of-way on public lands.
Reference to EIS: Summary, S-3, Line 5 – The USFS will decide whether to grant a special-use authorization on National Forest System lands.

1

B6a

It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized and approved as appropriate by the Public Utilities Commission in each state. The Applicant's goals and objectives for a project are outlined in their IRP, which is updated every two years and can be found at http://www.pacificorp.com/es/irp.html.

The BLM's purpose and need is to respond to the application for right-of-way across lands it administers.

B6b

While federal land-managing agencies do not have authority over nonfederal lands, federal agencies do have an obligation to disclose effects of its decisions on lands and resources affected by the decision. Therefore, the BLM uses the same systematic, defensible approach on all lands, regardless of jurisdiction, to analyze and compare the alternative routes, using consistent data and approach. In addition, as the lead federal agency for the EIS, the BLM is the federal steward for federally protected resources on all lands such as cultural resources (under Section 106 of the NHPA), biological resources (under Section 7 of the ESA), and paleontological resources (under the Paleontological Resources Protection Act). The BLM is addressing the protection and management of the federally protected resources rather than management of the land. If, in negotiations with private landowners, a landowner's preference for mitigation measures differs, other than the federally protected resources, the BLM will respect that through its compliance inspection contractor and the landowner will negotiate its preferences with the Applicant. However, the BLM will ask for a signed statement to that effect to document the B2H Project record.

COMMENT(S)

B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

B6c
Reference to EIS: Summary, S-3, Line 18 – Other federal agencies may rely on the Draft EIS and Final EIS to make decisions regarding authorizing the use of lands they manage.

B6d
Lack of information to make determinations
Agency and applicant fail to provide enough information about the project to allow private land owners such as myself to make a decision on what the exact impact will be on our private property, our business and our community. We were not able to analyze potential impacts of the decision due to the lack of information.
Items that may cross and impede our land, but have not been detailed, include high voltage lines, towers, helicopter landing zones, and items that I cannot possible understand or foresee. Representatives from the applicant and from a wide variety of agencies who have trespassed onto our property for their unannounced studies and research have mentioned these options and countless others. This makes it impossible for us to determine the exact financial or environmental impact, and therefore state or defend our stance on the EIS.

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A proposed action may be considered but eliminated from detailed analysis if: It is ineffective (it would not respond to BLM's purpose and need). The agency has failed to do a balanced and fair determination on the Burnt River Mt. Alternative because there is no agency statement of purpose and need for this project.
The agency failed to consider an alternative that would have placed the transmission line more significantly on BLM property. Placing the transmission line less than five miles to the west, crossing Burnt River Canyon west of Sinker Creek, west of our deeded ground, and continuing south on dry land would alleviate the burden on multiple private land owners. It would be practical because that BLM ground is dry land that will not be impacted by the line. It would also be feasible because the line would not visible to travelers wanting to admire the landscape or private land residents. The cumulative impact of this siting would be less because it would have less economic impact on neighboring owners, while any concerns regarding habitat impacts – if they exist – could be addressed through mitigation.

B6f
Reference to EIS: Summary, S-11, Figure S-4
The Burnt River Mt. Alternative is unfairly weighted on private land.
The agency failed to provide a fair and balanced alternative route along the Burnt River Mt. Alternative. The burden on private land owners is considerably unbalanced. Of the 16.8 miles, 73% is on private land, and only 27% on public land. Nearly 10% of that line is on our private property alone.

B6g
Reference to EIS: Summary, S-10, Line 31
There was a complete lack of mitigation allowed in this decision, because there is a very clear option on public land less than five miles to the west of our private ground, which would also avoid nearly all of our neighbors along this Alternative. The points of crossing our private land, and that of our neighbors, are not inconsequential. The line crosses the heart of our property and of our irrigated ground, which directly affects more than 35%of our property and more than 50% of our irrigated ground. This is an unfair, unbalanced and unacceptable burden.
Agency staff comments:
In conversation with Donald Gonzales (Vale BLM), this option was dismissed during a road trip with us because he determined from the road (Burnt River Canyon Lane) that the terrain could be steep for construction. He and his agency are not engineers, and viewing from this road is an unfair determination. We ride and drive the BLM above the road on a weekly basis and are well versed in the terrain. All areas are easily accessed by vehicle, when accessed through deer creek and wood gulch. We often haul large livestock trailers, as well as water and fence construction materials without problem.

B6h
Affected Environment – Direct and Indirect Environmental Consequences
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Existing environment – The EIS does not describe or show an understanding of the existing condition and trend of the environmental attributes that could be impacted by the proposed action or alternatives, specifically on the Burnt River Mountain Alternative. It is obvious there is a severe lack of resources to create a clear understanding of the environment as it is now, let alone a fair and balanced impact statement on how that can be affected by the project.

B6i
Earth resources – The agency failed to adequately research the environmental impact that the Burnt River Mt. Alt. will have on irrigated land and soils. The Burnt River Valley is very fertile, with Class I and Class II soils supporting and maintaining the agricultural stability of the private land owners and the community as a whole. Inadequate research or reporting has been done to determine the impact the construction of roads, towers, lines, etc. will have on those soils. Top soils are not deep, and on our property alone we are careful not to harm the top soil and soils permanently with light ATV vehicles, animal movement or overgrazing. We never drive heavy equipment on these irrigated soils because they cause permanent damage. Construction will have direct irreparable damage impact to that soil. Soil damage creates a long-term, high-intensity impact on a permanent basis.
Reference to EIS: Chapter 3.1.2.1, page 3-6, Line 15: Long-term, High-intensity impact—could cause substantial change or stress to an environmental resource.
Reference to EIS: Chapter 3, page 3-10, Line 9: Soil characteristics in the analysis area, such as soil erosion and compaction, soil suitability for reclamation, and soil resources that could be removed from productivity
Reference to EIS: Chapter 3, page 3-13, Lines 1-14: There is a plan to manage soils for public lands, but nowhere is it stated who will be managing protection of soils for private land owners, specifically on irrigated ground. This puts a huge imbalance of burden on private land owners, who do not possess the resources to protect themselves or their resources. The economic impact caused by soil damage will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by

2

RESPONSE(S)

B6c
See response to Comment B6b.

B6d
Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.

B6e
Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

A statement of the agencies' purpose and need is included in Chapter 1.

B6f
Comment noted. See response to Comment B6e.

B6g
Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3. Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment.

Analysis has been expanded to include alternative route variations with careful consideration of private lands. Input from the landowner and the impact on property will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B6h
See next page for response to B6h.

B6i
See next page for response to B6i.

COMMENT(S)

B6 **Burnt River Ranch – March 19, 2015 [3] (cont.)**

B6i more than 50%, and therefore our income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.

B6j Water resources – The agency failed to adequately research the environmental impact on our water systems along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. Reference to EIS: Chapter 3.2.2.3, page 3-65, Line 15-16: Would project construction, operations, and maintenance affect groundwater levels, 16 contamination, or ability to recharge (especially as it relates to potential blasting)?

B6k Reference to EIS: Chapter 3, page 3-71, Table 3-19. Surface Water Resources in the Analysis Area by County and Ownership:
The agency failed to adequately provide balanced environmental research on the amount of streams impacted in Baker County that are unfairly burdened on private land owners rather than on public lands. Of the 368 miles of impacted streams, 254 miles (70%) of private land streams will be impacted, compared to 57 miles (6%) of streams on the BLM public lands.
The economic impact caused by stream damage to drinking water and damage to irrigation systems on two irrigation districts (we are the headgate for both irrigation districts in the Burnt River valley) will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by more than 50%, and therefore our annual income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of cattle pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.

B6l Vegetation resources – The agency failed to adequately research the environmental impact on the vegetation resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action.

B6m Wildlife resources – The agency failed to adequately research the environmental impact on the wildlife resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. The lack of research is event in the lack of correct information in reporting the current environmental situation.

B6n Big game reported in this area includes mule deer, white-tailed deer, elk and big horn sheet. It omits antelope which are significantly prevalent. The EIS also lists that cliffs and talus areas are primarily utilized by the Big horn sheep. Yet the grasslands directly under the proposed Burnt River Mt. Alt. are the primary rutting grounds for the big horn sheep. These omissions of basic wildlife information, available from discussions with locals (and anyone driving on that road) clearly illustrates the lack of adequate research for this alternative. Reference to EIS: Summary, 3-257, Line 16.

B6o Impact on the rutting and mating ground on our property for big horn sheep, bald eagles, and mule deer. There a photos of the big horn sheep herd during the rut at the proposed line site. The big horn sheep specifically gather during the rut in the grassland dry field on the north side of the road, across from our irrigated ground and in the line of the Burnt River Mt. Alt., which is also used during the mule deer and white tail deer rut season. The bald eagles mate annually in and among the trees along the Burnt River directly along the line. We have witnessed them annual for more than five years.

B6p Visual resources – The agency failed to fairly and in a balanced manner research or report the environmental impact caused by the presence of large transmission towers. They will permanently damage visual resources, on both public and private ground. Reference to EIS: Summary, S-22, Line 10. Currently, the Burnt River Valley is picturesque, from the intersection of Hwy 30, throughout the valley, into the canyon and out the other side near Hereford. Residents of Baker County and beyond always exclaim when they learn where our home and Agri-tourism business is located, "That's one of the most beautiful locations in the state. I know exactly where that is. My family has visited that area for generations to hunt, gold mine, camp, explore…" This illustrates the strong historical and visual resource this valley and canyon are to the community and to the state of Oregon. On the public ground portion, mention has been made that it is zoned as a visual protected. We argue that that zone extends to
our private ground as well, and cannot be destroyed by "the presence of large transmission towers…" which would be blatantly seen on our open property, as opposed to the steep canyon within the zoned area, which would merely show lines – the towers would not be visible from the road. As it's currently placed, the towers and lines would impede the visual resources for my family (directly in front of our home window), our community, as well as for the citizens who travel to the Burnt River Canyon to enjoy its beauty – in both directions, as they are coming and going.

B6q The agency failed to fairly and in a balanced manner research or report the economic impact caused by damaged visual resources. The long-term economic impact created by the presence of large transmission towers will permanently damage visual resources, and therefore permanently impact our Agri-tourism business. Reference to EIS: Summary, S-22, Line 10. Our alternant source of income is Agri-tourism, where paying guests visit our ranch to view the visual beauty that this Oregon destination has to offer, and experience the culture of the western and cowboy lifestyle still alive in this community. We have been building this business for more than five years, and continue to grow. This business will no longer exist with the Burnt River Mt. Alt. lines traversing our property. We will be long-term, permanently driven out of business. The fact is that tourists will not pay to look at, sleep under, or be active around the line. It's not pretty – and the fear of potential danger will further drive business away.
"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission

B6r Cultural Resources – Reference to EIS: Summary, S-22, Line 15. And Summary, S-23, Table S-4
Example of cultural resources not researched
One example is the existence of historic Cairns within eye view and very close to the line. If I am able to collect and provide these detailed examples, the amount of undiscovered historical artifacts that would be disturbed by the construction and on-going existence of the B2H lines has clearly not been sufficiently researched. We are not professionals and we collected the following data within a week's time.
- Evidence: Photos of rock structures called cairns are attached.
- Location: Map of location is attached.

3

RESPONSE(S)

B6h Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.

B6i Impacts on important farmland and high-value soils (which includes non-irrigated and irrigated capability classes I-VI) have been updated. Refer to Section 3.2.7.6. Types of impacts on these soils to include possible permanent damage caused by heavy construction equipment.

Input from the landowner and the impact on property will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B6j The analysis for water resources has been revised to address potential effects of the B2H Project on groundwater resources, including those resulting from blasting. In addition, geotechnical investigations in areas of likely tower locations and areas of proposed blasting will occur as part of the Plan of Development to assist in refining project locations and minimizing project impacts.

B6k See next page for response to B6k.

B6l See next page for response to B6l.

B6m See next page for response to B6m.

B6n See next page for response to B6n.

B6o See next page for response to B6o.

B6p See next page for response to B6p.

B6q See next page for response to B6q.

B6r See next page for response to B6r.

COMMENT(S)

B6 **Burnt River Ranch – March 19, 2015 [3] (cont.)**

RESPONSE(S) - CONTINUED

B6k Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes. The economic analysis in 3.2.17 has been updated to assess how surface disturbances affecting private irrigated pasture and grasslands may affect local economic conditions. Input from the landowner and the impact on property will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B6l Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.

B6m See response to Comment B6l.

B6n Text has been edited to include discussion of antelope and bighorn sheep inhabiting the indicated areas.

B6o Comment noted. The Applicant has committed to design features and site-specific selective mitigation measures designed to minimize anticipated B2H Project effects to big game and bald eagles, such as seasonal and spatial restrictions, avian-safe design standards, creation of a Plan of Development that includes a Biological Resources Conservation Plan, and limiting new or improved accessibility to sensitive habitat.

B6p See response to Comment B6l.

COMMENT(S)

RESPONSE(S) - CONTINUED

B6 **Burnt River Ranch – March 19, 2015 [3] (cont.)**

B6q

The economic impact analysis in Section 3.2.17 assess impacts on property values based on the impacts determined in Section 3.2.12 and published studies on the impacts of high-voltage transmission lines on property values.

Input from the landowner and the impact on property rights will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B6r

These resources are characterized in the qualitative discussion in the EIS (refer to Chapter 3). Further, these resources have been verified by BLM archaeologists and, if the alternative route is selected for construction, the resources would be evaluated and analyzed under Section 106 of the National Historic Preservation Act.

COMMENT(S)

B6 **Burnt River Ranch – March 19, 2015 [3] (cont.)**

B6s
• Personal interviews: We interviewed a local man who hunts and camps in the Burnt River Canyon frequently. He is a native descendant of the Nez Perce tribe and visits here to connect with his ancestors. He described the important of this canyon, the river, and the rocks to his ancestors. He explained that burials exist along the canyon and surrounding areas in the rock crevices. And that many cairns – rock structures – exist for hundreds of miles to use as "road signs" to direct people to the great gathering, trading and grazing area of the Burnt River Canyon and Valley. They are visible atop the peaks along the historical route. The visual impact the B2H lines create would be devastating and permanent.
Lack of follow-up on existing knowledge, example
Appendix A—Government-to-Government Tribal Consultation, on October 24, 2013 an email To: Renee Straub, Jennifer Theisen, and Shane Baker From: Catherine Dickson states:
"Concern with rock features reported by private land owners. Jennifer called the landowners and followed up with IPC; however the site, to date, has not been verified."
We did not receive interaction or have the opportunity to comment, as private land owners mentioned in the above email. At the meeting in Durkee, Doug Shook invited the BLM archeologist to take a tour either in ATVs or horseback to view and photograph the structures. No response was received and no visit was made. He acquired the attached photos himself.
Unbalanced scores, and lack of quality research
Reference to EIS: Summary, S-23, Table S-4
Burnt River Mountain Alternative has a "HIGH" Potential Impact Assessment; even though scores were based on RLS/Class I index scores only. Index scores could not be combined for those alternatives because no Class II survey was conducted along either the Proposed Action or alternative route.

B6t
Chapter3 – Land use and Agriculture
Agriculture: The agency failed to fairly and in a balanced manner research or report the environmental impact on agriculture by claiming that damage created by construction would be temporary and restricted to the areas of construction. Soil damage, as noted above, will be permanent. Refer to the soil comment above. Staff members trespassing on our private ground to conduct research stated in personal conversations that they were surveying the area for possible construction sites. They stated that to build a tower, plan to see damage done spread over five to ten times what is actual space needed for the actual structure, plus additional for access roads for large equipment. This lack of information provided does not allow me to make an accurate evaluation of what the level of damage will be, and the agency cannot either.

B6u
Reference to EIS: 3.2.6.3, 3-441, Lines 28-32: …could temporarily disrupt agricultural operations in the vicinity of construction…
The impact on this community and of the landowners is misrepresented.
The economic harm to my operation was not adequately characterized in the EIS because the unbalanced representation of private land owners and on the Burnt River Mt. Alt. is clear. On my farm alone I have invested $200,000 in improvements and structures that will be impacted by the transmission lines. The EIS does not account for those investments

B6v
Property Values Reference to EIS: Chapter 3, 3-922. Line 20
Approximately 71 percent of the land that would be crossed by the proposed B2H Project is privately 22 owned. The majority of land is owned privately, yet the agency has the decision making power, though they own only 22 percent of the impacted property. This burden is completely biased and must be made a fair playing field. This section is titled property values, though values are not discussed. There is a

B6w
clear drop in property value. From my own personal experience, I purchased property with a powerline tower on it ten years ago. Because of the structure and lines, I negotiated a 35% drop in price, even though the structure was not visible from the home. I will not be able to retain my home, my business or my property when my property value drops by 35%. This big of a loss taken by land owners – combined with the complete imbalance of private vs. public lands and the decision being placed in the hands of agencies, and completely out of the hands of land owners is not acceptable.

B6x
Socioeconomic
Reference to EIS: Chapter 3, 3-897
To impact the economic income and livelihood of a community primarily made of land owners who are senior citizens and women is unethical and unaccounted for in the EIS. On our land, business alone:
Discrimination example: this three-generation business is owned by:
- women: grandmother, mother and daughter
- senior citizens: grandparents, sole source of income ages 71 and 68
- veteran: grandfather was Army Special Forces, served in Vietnam
Livability: Our current home site was built in 1922 and has been inhabited consistently since then, is directly impacted by the transmission lines, and our proposed new second home building site, construction to start in May
2015, is directly under the line. Example of insufficient information demonstrated by BLM staff at the Vale office on the phone said they needed to look up our property before discussing it, quote from Renee Straub (BLM Vale) "We did not know that anyone lived there – that there was a residence on that property."

B6y
Recreation and Tourism Reference to EIS: Chapter 3, 3-94. Line 26
This unbalanced level of research and reporting is clear when referring to recreation and tourism. Recreational events are listed, but tourism is not addressed. The economic impact on tourism is long term and permanent because the towers and lines are a permanent eyesore. In my business alone, we will lose long-time customers and the potential for any new customers. These eyesores will ruin tourism in our valley, permanently.

B6z
Public Health and Safety
Our home is in direct eye sight of the Burnt River Mountain Alternative, and is in very close proximity. Our proposed building site, beginning March 2015 is directly under the line. Our business operation requires that we operate directly under the line on a daily bases to irrigate, ride, check cattle, calve, feed, manage the stack yard, fix fences, and conduct Agri-tourism activities. These are all affected by the line in a negative way.

4

RESPONSE(S)

B6s
See response to Comment B6r.

B6t
See response to Comment B6l.

The Final EIS indicates that impacts on soils as a result of construction activities include: soil erosion, damage to agricultural land soil drainage, the mixing of topsoil and subsoil, the loss of topsoils, and soil compaction. Refer to Section 3.2.7.6 (Types of Potential Effects) for further discussion.

B6u
The economic analysis in Section 3.2.17 has been revised to assess how changes in land use as a result of the construction and operation of the B2H transmission line may affect local economic conditions. Idaho Power will work with individual land owners to mitigate impacts to existing infrastructure and operations during negotiations to obtain the right-of-way.

B6v
While federal land-managing agencies do not have authority over nonfederal lands, federal agencies do have an obligation to disclose effects of its decisions on lands affected by the decision. Therefore, the BLM uses the same systematic, defensible approach on all lands, regardless of jurisdiction, to analyze and compare the alternative routes, using consistent data and approach. In addition, as the lead federal agency for the EIS, the BLM is the federal steward for federally protected resources such as cultural resources (under Section 106 of the NHPA), biological resources (under Section 7 of the ESA), and paleontological resources (under the Paleontological Resources Protection Act). The BLM is addressing the protection and management of the federally protected resources rather than management of the land. If, in negotiations with private landowners, a landowner's preference for mitigation measures differs, the BLM will respect that and the landowner will negotiate its preferences with Idaho Power. However, the BLM may ask for a signed statement to that effect.

B6w
The economic analysis in Section 3.2.17 has been updated to further discuss how transmission lines may affect surrounding property values. Once the location for the transmission line route is identified, Idaho Power will coordinate with property owners to obtain rights-of-way through mutual agreements. Idaho Power will negotiate modifications to the line's design and the location of towers and access roads and compensate land owners for any unavoidable damages.

B6x
The environmental justice analysis in Section 3.2.17 has been updated to further discuss how transmission lines may affect underserved and at-risk populations. Once the location for the transmission line route is identified, Idaho Power will coordinate with property owners to obtain rights-of-way through mutual agreements. Idaho Power will negotiate modifications to the line's design and the location of towers and access roads and compensate land owners for any unavoidable damages.

B6y
See response to Comment B6l. Economic impacts to recreation and tourism is addressed in Section 3.2.8.5. Applicant-committed design features including selective mitigation measures will be used to reduce visual impacts to recreational resources.

B6z
See next page for response to B6z.

COMMENT(S)

B6 **Burnt River Ranch – March 19, 2015 [3] (cont.)**

B6aa
Noise Reference to EIS: Chapter 3, 3-953. Line 11
The agency failed to provide fair and balanced research along the Burnt River Mt. Alt – made evident in the noise research done along the road in at private residences of our neighbors, but never near our home or near the line location on our property. Other residences where tests were held are much further from the line than ours. Yet no testing was done on our property, or at our residence, which is .5 mile from the right of way.
Reference to EIS: Chapter 3, 3-953. Line 11 To analyze noise impacts, all structures within 0.5 mile of the edge of the proposed right-of-way were inventoried. The evaluation of noise energy created by the B2H Project involves an identification of the existing or ambient sound levels followed by a prediction of the future sound levels attributed to the B2H Project.

B6ab
We called the BLM office and Vale to ask why we were not included in this testing, and were told that they were unaware of a residence on this property. We are on their mailing list and property address obviously public information. We are on their list of property owners. This blatant lack of research and knowledge make this EIS unfair and unbalanced for lack of resources, and lack of correct information.

B6ac
Electrical Environment Reference to EIS: Chapter 3, 3-961. Line 24
Electrical fields will interfere or cause harm to nearby metal objects, such as vehicles, animal feeders, watering stations, or other equipment and fences. Personal experience: I have lived and raised and managed livestock under powerlines in Umatilla and Morrow counties previously. My personal experience shows that metal objects listed above do carry voltage and will shock people – I have been shocked from a metal livestock trailer – and livestock.

B6ad
The line on the Burnt River Mt. Alt. that runs over our property crosses a large portion of irrigated ground where we flood irrigate by hand. Operating daily during the summer in live water with power lines overhead – along with my family and children – creates extreme fear.
Field Induction (Induced Currents and Nuisance Shocks) Reference to EIS: Chapter 3, 3-980. Line 9
Electromagnetic Interference to Cardiac Pacemakers Reference to EIS: Chapter 3, 3-986. Line 35
Human Health Effects of EMF Reference to EIS: Chapter 3, 3-987. Line 27
The fear of potential electrical fields effecting or causing harm to people, livestock, wildlife – will have a permanent effect on our business and our livelihood as an Agri-tourism business. Tourists do not want to pay to stay so near transmission lines, and will be driven away due to fear. This economic impact will be permanent, long-term and irreparable.
"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission Lines
Link = http://headwaterseconomics.org/library/files/AppraisalGroupOne;ValuationGuidelines.pdf

B6ae
Chapter 4 – Consultation and Coordination
The list of agencies and organizations consulted, and the cooperation shown to protect those they represent is evident. Those all represent mostly public lands, which make up approximately 23%of the line. The other 77% of the line impacts private land owners. The EIS is unbalanced and unfair because it does not describe who is protecting and coordinating in the interest of private land owners. Nor does it describe an equal amount of planning to incorporate the private land owners into the process to learn and glean important information needed to be informed about 77% of the land where the line will run. Nor does it address attempts to mitigate situations that may arise in that process.

B6af
Harmful personal agency staff comments
I was told by Donald Gonzales (Vale BLM), during a personal visit to my property. "Do not get an attorney. It will be very expensive and complicate the process even further. At this point it's just not a good idea, and a waste of money for you." This advice is extremely harmful to our situation because the EIS is an incredibly complicated document, as is the commenting procedure. This suggestion not to seek legal guide has deeply hurt our ability to state our situation and provide comments within the official guidelines.

B6ag
Mitigation
I am a land owner and I am open to mitigation on the location the line, as it pertains to my privately owned land, and ways to alleviate the many detrimental items listed above. I have seen a lack of willingness to mitigate these items from the agency, as many of the items listed above have been discussed in length with the agency and are omitted from the EIS, specifically related to the Burnt River Mountain Alternative.

5

RESPONSE(S)

B6z
Coordinating with the landowner, Idaho Power adjusted the alignment of this route to be farther east from these facilities. This recommended routing option was incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

B6aa
See response to Comment B6l.

Noise is addressed in Section 3.2.18 of the EIS. Corona is a weak source of audible noise and the proposed line is designed to meet applicable noise limits. The levels of audible noise are further reduced with distance. In fair weather the noise may not be detectable at all and indoors the levels would be still lower. The Applicant will comply with established noise ordinances and suggested noise guidelines to reduce the potential for adverse noise impacts at noise-sensitive receptors.

B6ab
See response to Comment B6l.

Noise is addressed in Section 3.2.18 of the EIS. Corona is a weak source of audible noise and the proposed line is designed to meet applicable noise limits. The levels of audible noise are further reduced with distance. In fair weather the noise may not be detectable at all and indoors the levels would be still lower. The Applicant will comply with established noise ordinances and suggested noise guidelines to reduce the potential for adverse noise impacts at noise-sensitive receptors.

B6ac
Comment noted.

B6ad
Comments noted. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP), for guidance and guidelines regarding EMF. EMF is discussed in greater detail in Section 3.2.18. As identified in design features of the Proposed Action (Table 2-7, Design Feature), the Applicant would continue to address public health and safety throughout the life of the B2H Project.

The Final EIS is not intended to serve as an appraisal of the project's impact on property value for individual parcels. Analysis has been expanded to include alternative route variations with careful consideration of private lands. Input from the landowner and the impact on property will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

B6ae
See next page for response to B6ae.

B6af
See next page for response to B6af.

B6ag
See next page for response to B6ag.

COMMENT(S)

RESPONSE(S) - CONTINUED

B6 **Burnt River Ranch – March 19, 2015 [3] (cont.)**

B6ae While federal land-managing agencies do not have authority over nonfederal lands, federal agencies do have an obligation to disclose effects of its decisions on lands affected by the decision. Therefore, the BLM uses the same systematic, defensible approach on all lands, regardless of jurisdiction, to analyze and compare the alternative routes, using consistent data and approach. In addition, as the lead federal agency for the EIS, the BLM is the federal steward for federally protected resources such as cultural resources (under Section 106 of the NHPA), biological resources (under Section 7 of the ESA), and paleontological resources (under the Paleontological Resources Protection Act). The BLM is addressing the protection and management of the federally protected resources rather than management of the land. If, in negotiations with private landowners, a landowner's preference for mitigation measures differs, the BLM will respect that and the landowner will negotiate its preferences with Idaho Power. However, the BLM may ask for a signed statement to that effect.

Discussion in the Final EIS been expanded to address impacts more consistently for all alternative routes (Chapter 3).

B6af Comment noted.

B6ag Since this comment on the Draft EIS was submitted, Idaho Power has coordinated with the landowner to adjust the location of the route in the vicinity of this property. The adjustment to this route was incorporated into the network of alternative routes analyzed and addressed in the Final EIS. Included in the Final EIS is an expanded discussion of impacts along all alternative routes and measures to mitigate impacts. If this route is selected for construction of the transmission line, measures to mitigate impacts may be negotiated further with Idaho Power.

COMMENT(S)

RESPONSE(S)

B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

Jefri Van Arsdall
Cell 541-908-2361
Email raeannvanarsdall@gmail.com
Tax lots: three affected
11S42E03200, 11S42E03500,11S42E03600

Burnt River Ranch
31116 Burnt River Canyon Lane
Durkee, OR 97905
Private land condemned by the
Burnt River Mountain Alternative

Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."
comment@boardmantohemingway.com
Vale District Office
100 Oregon Street, Vale, Oregon 97918
P.O. Box 655, Vale, Oregon 97918

Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

Statement: The Burnt River Mountain Alternative is unacceptable and fatally harmful to our environment, our community and our local economy. The Draft EIS underestimated the effect of the Burnt River Mountain Alternative, by neglecting to provide an adequately fair and balanced report. Evidence of where it failed to account for both Environmental and Economic impacts made by this alternative is clear and detailed in each of the topics included in, but not limited to, the items listed below – and in every aspect of the EIS. There is also a blatant lack of purpose and need for this project, evident in all topics and chapters throughout the EIS.

Purpose and need
The agency has not provided substantive support or stated their purpose and need for the project. The applicant has not demonstrated a need. There is a clear lack of purpose and need for this project. Any potential purpose and need are too narrow, unduly constraining the range of alternatives considered by the agency. The overall economic burden and burden on other uses is high and the applicant's need is low, which clearly tips the scales in favor of the no action alternative.

Reference to EIS: Summary, S-2, Lines 5 to 8
The B2H Project is neither required to support any particular new power generation project nor justified by any particular existing power generation project. Rather, the B2H Project would meet IPC's obligations to meet Federal Energy Regulatory Commission, Oregon Public Utility Commission, and the Idaho Public Utility Commission requirements.

Statements showing lack of need, made by agency staff
There has never been a statement made with examples of what this line will be used for, or its benefits. When asked directly, Donald Gonzales from BLM responded.
Question asked by me in person on our property, and again by my family in a meeting in Durkee:
"If a need for use and benefits can be stated clearly, illustrating how this B2H line will benefit me, my family, my business, my community, my county, my state or even my country – perhaps we could fairly discuss the project and determine how to mitigate environmental and economic challenges. What are the benefits?"
Donald Gonzales responded that the benefits are not clear. There may be a fire department added in Baker City, Oregon. But the local benefits to your community or your family cannot be described. The need for this cannot be described.

Decisions by agencies for public land right of way. There is unfair and unbalanced lack of research and support to determine the need or grant right-of-way on my privately owned land.

COMMENT(S)

RESPONSE(S)

B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

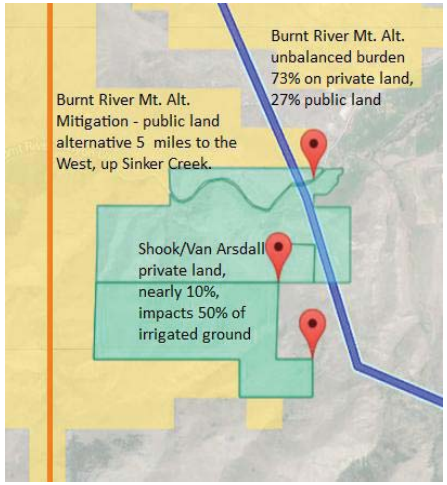
There is no reference to who makes decisions regarding authorizing the use of my land that I manage.
Reference to EIS: Summary, S-3, Line 1 – The BLM will decide whether or not to grant the requested right-of-way on public lands.
Reference to EIS: Summary, S-3, Line 5 – The USFS will decide whether to grant a special-use authorization on National Forest System lands.
Reference to EIS: Summary, S-3, Line 18 – Other federal agencies may rely on the Draft EIS and Final EIS to make decisions regarding authorizing the use of lands they manage.

Lack of information to make determinations
Agency and applicant fail to provide enough information about the project to allow private land owners such as myself to make a decision on what the exact impact will be on our private property, our business and our community. We were not able to analyze potential impacts of the decision due to the lack of information. Items that may cross and impede our land, but have not been detailed, include high voltage lines, towers, helicopter landing zones, and items that I cannot possible understand or foresee. Representatives from the applicant and from a wide variety of agencies who have trespassed onto our property for their unannounced studies and research have mentioned these options and countless others. This makes it impossible for us to determine the exact financial or environmental impact, and therefore state or defend our stance on the EIS.

Addressing alternatives
There were important practical and feasible alternatives the agency did not include.

Alternative Considered But Eliminated From the Detailed Analysis
Reference to EIS: Page 2-66, 2.4, Line 20
A proposed action may be considered but eliminated from detailed analysis if: It is ineffective (it would not respond to BLM's purpose and need). The agency has failed to do a balanced and fair determination on the Burnt River Mt. Alternative because there is no agency statement of purpose and need for this project.

The agency failed to consider an alternative that would have placed the transmission line more significantly on BLM property. Placing the transmission line less than five miles to the west, crossing Burnt River Canyon west of Sinker Creek, west of our deeded ground, and continuing south on dry land would alleviate the burden on multiple private land owners. It would be practical because that BLM ground is dry land that will not be impacted by the line. It would also be feasible because the line would not visible to travelers wanting to admire the landscape or private land residents. The cumulative impact of this siting would be less because it would have less economic impact on neighboring owners, while any concerns regarding habitat impacts – if they exist – could be addressed through mitigation.
Reference to EIS: Summary, S-11, Figure S-4



The Burnt River Mt. Alternative is unfairly weighted on private land.
The agency failed to provide a fair and balanced alternative route along the Burnt River Mt. Alternative. The burden on private land owners is considerably unbalanced. Of the 16.8 miles, 73% is on private land, and only 27% on public land. Nearly 10% of that line is on our private property alone.

COMMENT(S)

RESPONSE(S)

B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

Reference to EIS: Summary, S-10, Line 31
There was a complete lack of mitigation allowed in this decision, because there is a very clear option on public land less than five miles to the west of our private ground, which would also avoid nearly all of our neighbors along this Alternative. The points of crossing our private land, and that of our neighbors, are not inconsequential. The line crosses the heart of our property and of our irrigated ground, which directly affects more than 35%of our property and more than 50% of our irrigated ground. This is an unfair, unbalanced and unacceptable burden.

Agency staff comments:
In conversation with Donald Gonzales (Vale BLM), this option was dismissed during a road trip with us because he determined from the road (Burnt River Canyon Lane) that the terrain could be steep for construction. He and his agency are not engineers, and viewing from this road is an unfair determination. We ride and drive the BLM above the road on a weekly basis and are well versed in the terrain. All areas are easily accessed by vehicle, when accessed through deer creek and wood gulch. We often haul large livestock trailers, as well as water and fence construction materials without problem.

Affected Environment – Direct and Indirect Environmental Consequences
For purposes of the affected environment and environmental consequences, environment includes the broad biological, physical, social, and economic elements of the environment.

Environmental Resources impacted
The agency failed to provide a fair and balanced report on the environmental impact caused by Burnt River Mt. Alternative.

Existing environment – The EIS does not describe or show an understanding of the existing condition and trend of the environmental attributes that could be impacted by the proposed action or alternatives, specifically on the Burnt River Mountain Alternative. It is obvious there is a severe lack of resources to create a clear understanding of the environment as it is now, let alone a fair and balanced impact statement on how that can be affected by the project.

Earth resources – The agency failed to adequately research the environmental impact that the Burnt River Mt. Alt. will have on irrigated land and soils. The Burnt River Valley is very fertile, with Class I and Class II soils supporting and maintaining the agricultural stability of the private land owners and the community as a whole. Inadequate research or reporting has been done to determine the impact the construction of roads, towers, lines, etc. will have on those soils. Top soils are not deep, and on our property alone we are careful not to harm the top soil and soils permanently with light ATV vehicles, animal movement or overgrazing. We never drive heavy equipment on these irrigated soils because they cause permanent damage. Construction will have direct irreparable damage impact to that soil. Soil damage creates a long-term, high-intensity impact on a permanent basis.
Reference to EIS: Chapter 3.1.2.1, page 3-6, Line 15: Long-term, High-intensity impact—could cause substantial change or stress to an environmental resource.
Reference to EIS: Chapter 3, page 3-10, Line 9: Soil characteristics in the analysis area, such as soil erosion and compaction, soil suitability for reclamation, and soil resources that could be removed from productivity
Reference to EIS: Chapter 3, page 3-13, Lines 1-14: There is a plan to manage soils for public lands, but nowhere is it stated who will be managing protection of soils for private land owners, specifically on irrigated ground. This puts a huge imbalance of burden on private land owners, who do not possess the resources to protect themselves or their resources.
The economic impact caused by soil damage will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by more than 50%, and therefore our income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay

COMMENT(S)

RESPONSE(S)

B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.

Water resources – The agency failed to adequately research the environmental impact on our water systems along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. Reference to EIS: Chapter 3.2.2.3, page 3-65, Line 15-16: Would project construction, operations, and maintenance affect groundwater levels, 16 contamination, or ability to recharge (especially as it relates to potential blasting)?

Reference to EIS: Chapter 3, page 3-71, Table 3-19. Surface Water Resources in the Analysis Area by County and Ownership:
The agency failed to adequately provide balanced environmental research on the amount of streams impacted in Baker County that are unfairly burdened on private land owners rather than on public lands. Of the 368 miles of impacted streams, 254 miles (70%) of private land streams will be impacted, compared to 57 miles (6%) of streams on the BLM public lands.

The economic impact caused by stream damage to drinking water and damage to irrigation systems on two irrigation districts (we are the headgate for both irrigation districts in the Burnt River valley) will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by more than 50%, and therefore our annual income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of cattle pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.

Vegetation resources – The agency failed to adequately research the environmental impact on the vegetation resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action.

Wildlife resources – The agency failed to adequately research the environmental impact on the wildlife resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. The lack of research is event in the lack of correct information in reporting the current environmental situation. Big game reported in this area includes mule deer, white-tailed deer, elk and big horn sheet. It omits antelope which are significantly prevalent. The EIS also lists that cliffs and talus areas are primarily utilized by the Big horn sheep. Yet the grasslands directly under the proposed Burnt River Mt. Alt. are the primary rutting grounds for the big horn sheep. These omissions of basic wildlife information, available from discussions with locals (and anyone driving on that road) clearly illustrates the lack of adequate research for this alternative.
Reference to EIS: Summary, 3-257, Line 16.
Impact on the rutting and mating ground on our property for big horn sheep, bald eagles, and mule deer. There a photos of the big horn sheep herd during the rut at the proposed line site. The big horn sheep specifically gather during the rut in the grassland dry field on the north side of the road, across from our irrigated ground and in the line of the Burnt River Mt. Alt., which is also used during the mule deer and white tail deer rut season. The bald eagles mate annually in and among the trees along the Burnt River directly along the line. We have witnessed them annual for more than five years.

Visual resources – The agency failed to fairly and in a balanced manner research or report the environmental impact caused by the presence of large transmission towers. They will permanently damage visual resources, on both public and private ground. Reference to EIS: Summary, S-22, Line 10. Currently, the Burnt River Valley is picturesque, from the intersection of Hwy 30, throughout the valley, into the canyon and out the other side near Hereford. Residents of Baker County and beyond always exclaim when they learn where our home and Agri-tourism business is located, "That's one of the most beautiful locations in the state. I know exactly where that is. My family has visited that area for generations to hunt, gold mine, camp, explore…" This illustrates the strong historical and visual resource this valley and canyon are to the community and to the state of Oregon. On the public ground portion, mention has been made that it is zoned as a visual protected. We argue that that zone extends to

COMMENT(S)

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B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

our private ground as well, and cannot be destroyed by "the presence of large transmission towers…" which would be blatantly seen on our open property, as opposed to the steep canyon within the zoned area, which would merely show lines – the towers would not be visible from the road. As it's currently placed, the towers and lines would impede the visual resources for my family (directly in front of our home window), our community, as well as for the citizens who travel to the Burnt River Canyon to enjoy its beauty – in both directions, as they are coming and going.

The agency failed to fairly and in a balanced manner research or report the economic impact caused by damaged visual resources. The long-term economic impact created by the presence of large transmission towers will permanently damage visual resources, and therefore permanently impact our Agri-tourism business. Reference to EIS: Summary, S-22, Line 10. Our alternant source of income is Agri-tourism, where paying guests visit our ranch to view the visual beauty that this Oregon destination has to offer, and experience the culture of the western and cowboy lifestyle still alive in this community. We have been building this business for more than five years, and continue to grow. This business will no longer exist with the Burnt River Mt. Alt. lines traversing our property. We will be long-term, permanently driven out of business. The fact is that tourists will not pay to look at, sleep under, or be active around the line. It's not pretty – and the fear of potential danger will further drive business away.

"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission

Cultural Resources – Reference to EIS: Summary, S-22, Line 15. And Summary, S-23, Table S-4

Example of cultural resources not researched
One example is the existence of historic Cairns within eye view and very close to the line. If I am able to collect and provide these detailed examples, the amount of undiscovered historical artifacts that would be disturbed by the construction and on-going existence of the B2H lines has clearly not been sufficiently researched. We are not professionals and we collected the following data within a week's time.

- Evidence: Photos of rock structures called cairns are attached.
- Location: Map of location is attached.
- Personal interviews: We interviewed a local man who hunts and camps in the Burnt River Canyon frequently. He is a native descendant of the Nez Perce tribe and visits here to connect with his ancestors. He described the important of this canyon, the river, and the rocks to his ancestors. He explained that burials exist along the canyon and surrounding areas in the rock crevices. And that many cairns – rock structures – exist for hundreds of miles to use as "road signs" to direct people to the great gathering, trading and grazing area of the Burnt River Canyon and Valley. They are visible atop the peaks along the historical route. The visual impact the B2H lines create would be devastating and permanent.

Lack of follow-up on existing knowledge, example
Appendix A—Government-to-Government Tribal Consultation, on October 24, 2013 an email To: Renee Straub, Jennifer Theisen, and Shane Baker From: Catherine Dickson states:
"Concern with rock features reported by private land owners. Jennifer called the landowners and followed up with IPC; however the site, to date, has not been verified."
We did not receive interaction or have the opportunity to comment, as private land owners mentioned in the above email. At the meeting in Durkee, Doug Shook invited the BLM archeologist to take a tour either in ATVs or horseback to view and photograph the structures. No response was received and no visit was made. He acquired the attached photos himself.

Unbalanced scores, and lack of quality research

COMMENT(S)

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B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

Reference to EIS: Summary, S-23, Table S-4
Burnt River Mountain Alternative has a "HIGH" Potential Impact Assessment; even though scores were based on RLS/Class I index scores only. Index scores could not be combined for those alternatives because no Class II survey was conducted along either the Proposed Action or alternative route.

Chapter3 – Land use and Agriculture

Agriculture: The agency failed to fairly and in a balanced manner research or report the environmental impact on agriculture by claiming that damage created by construction would be temporary and restricted to the areas of construction. Soil damage, as noted above, will be permanent. Refer to the soil comment above. Staff members trespassing on our private ground to conduct research stated in personal conversations that they were surveying the area for possible construction sites. They stated that to build a tower, plan to see damage done spread over five to ten times what is actual space needed for the actual structure, plus additional for access roads for large equipment. This lack of information provided does not allow me to make an accurate evaluation of what the level of damage will be, and the agency cannot either.
Reference to EIS: 3.2.6.3, 3-441, Lines 28-32: …could temporarily disrupt agricultural operations in the vicinity of construction…

The impact on this community and of the landowners is misrepresented.
The economic harm to my operation was not adequately characterized in the EIS because the unbalanced representation of private land owners and on the Burnt River Mt. Alt. is clear. On my farm alone I have invested $200,000 in improvements and structures that will be impacted by the transmission lines. The EIS does not account for those investments

Property Values Reference to EIS: Chapter 3, 3-922. Line 20
Approximately 71 percent of the land that would be crossed by the proposed B2H Project is privately 22 owned. The majority of land is owned privately, yet the agency has the decision making power, though they own only 22 percent of the impacted property. This burden is completely biased and must be made a fair playing field. This section is titled property values, though values are not discussed. There is a clear drop in property value. From my own personal experience, I purchased property with a powerline tower on it ten years ago. Because of the structure and lines, I negotiated a 35% drop in price, even though the structure was not visible from the home. I will not be able to retain my home, my business or my property when my property value drops by 35%. This big of a loss taken by land owners – combined with the complete imbalance of private vs. public lands and the decision being placed in the hands of agencies, and completely out of the hands of land owners is not acceptable.

Socioeconomic
Reference to EIS: Chapter 3, 3-897
To impact the economic income and livelihood of a community primarily made of land owners who are senior citizens and women is unethical and unaccounted for in the EIS. On our land, business alone:

Discrimination example: this three-generation business is owned by:
- women: grandmother, mother and daughter
- senior citizens: grandparents, sole source of income ages 71 and 68
- veteran: grandfather was Army Special Forces, served in Vietnam

Livability: Our current home site was built in 1922 and has been inhabited consistently since then, is directly impacted by the transmission lines, and our proposed new second home building site, construction to start in May

COMMENT(S)

RESPONSE(S)

B6 Burnt River Ranch – March 19, 2015 [3] (cont.)

2015, is directly under the line. Example of insufficient information demonstrated by BLM staff at the Vale office on the phone said they needed to look up our property before discussing it, quote from Renee Straub (BLM Vale) "We did not know that anyone lived there – that there was a residence on that property."

Recreation and Tourism Reference to EIS: Chapter 3, 3-94. Line 26
This unbalanced level of research and reporting is clear when referring to recreation and tourism. Recreational events are listed, but tourism is not addressed. The economic impact on tourism is long term and permanent because the towers and lines are a permanent eyesore. In my business alone, we will lose long-time customers and the potential for any new customers. These eyesores will ruin tourism in our valley, permanently.

Public Health and Safety

Our home is in direct eye sight of the Burnt River Mountain Alternative, and is in very close proximity. Our proposed building site, beginning March 2015 is directly under the line. Our business operation requires that we operate directly under the line on a daily bases to irrigate, ride, check cattle, calve, feed, manage the stack yard, fix fences, and conduct Agri-tourism activities. These are all affected by the line in a negative way.

Noise Reference to EIS: Chapter 3, 3-953. Line 11
The agency failed to provide fair and balanced research along the Burnt River Mt. Alt – made evident in the noise research done along the road in at private residences of our neighbors, but never near our home or near the line location on our property. Other residences where tests were held are much further from the line than ours. Yet no testing was done on our property, or at our residence, which is .5 mile from the right of way.

Reference to EIS: Chapter 3, 3-953. Line 11 To analyze noise impacts, all structures within 0.5 mile of the edge of the proposed right-of-way were inventoried. The evaluation of noise energy created by the B2H Project involves an identification of the existing or ambient sound levels followed by a prediction of the future sound levels attributed to the B2H Project.

We called the BLM office and Vale to ask why we were not included in this testing, and were told that they were unaware of a residence on this property. We are on their mailing list and property address obviously public information. We are on their list of property owners. This blatant lack of research and knowledge make this EIS unfair and unbalanced for lack of resources, and lack of correct information.

Electrical Environment Reference to EIS: Chapter 3, 3-961. Line 24
Electrical fields will interfere or cause harm to nearby metal objects, such as vehicles, animal feeders, watering stations, or other equipment and fences. Personal experience: I have lived and raised and managed livestock under powerlines in Umatilla and Morrow counties previously. My personal experience shows that metal objects listed above do carry voltage and will shock people – I have been shocked from a metal livestock trailer – and livestock.

The line on the Burnt River Mt. Alt. that runs over our property crosses a large portion of irrigated ground where we flood irrigate by hand. Operating daily during the summer in live water with power lines overhead – along with my family and children – creates extreme fear.

Field Induction (Induced Currents and Nuisance Shocks) Reference to EIS: Chapter 3, 3-980. Line 9
Electromagnetic Interference to Cardiac Pacemakers Reference to EIS: Chapter 3, 3-986. Line 35
Human Health Effects of EMF Reference to EIS: Chapter 3, 3-987. Line 27
The fear of potential electrical fields effecting or causing harm to people, livestock, wildlife – will have a permanent effect on our business and our livelihood as an Agri-tourism business. Tourists do not want to pay to stay so near transmission lines, and will be driven away due to fear. This economic impact will be permanent, long-term and irreparable.

COMMENT(S)

RESPONSE(S)

B6 **Burnt River Ranch – March 19, 2015 [3] (cont.)**

"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
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Link = http://headwaterseconomics.org/library/files/AppraisalGroupOne;ValuationGuidelines.pdf

Chapter 4 – Consultation and Coordination

The list of agencies and organizations consulted, and the cooperation shown to protect those they represent is evident. Those all represent mostly public lands, which make up approximately 23%of the line. The other 77% of the line impacts private land owners. The EIS is unbalanced and unfair because it does not describe who is protecting and coordinating in the interest of private land owners. Nor does it describe an equal amount of planning to incorporate the private land owners into the process to learn and glean important information needed to be informed about 77% of the land where the line will run. Nor does it address attempts to mitigate situations that may arise in that process.

Harmful personal agency staff comments
I was told by Donald Gonzales (Vale BLM), during a personal visit to my property. "Do not get an attorney. It will be very expensive and complicate the process even further. At this point it's just not a good idea, and a waste of money for you." This advice is extremely harmful to our situation because the EIS is an incredibly complicated document, as is the commenting procedure. This suggestion not to seek legal guide has deeply hurt our ability to state our situation and provide comments within the official guidelines.

Mitigation
I am a land owner and I am open to mitigation on the location the line, as it pertains to my privately owned land, and ways to alleviate the many detrimental items listed above. I have seen a lack of willingness to mitigate these items from the agency, as many of the items listed above have been discussed in length with the agency and are omitted from the EIS, specifically related to the Burnt River Mountain Alternative.

COMMENT(S)

RESPONSE(S)

B7 **Burnt River Ranch – March 19, 2015 [4]**

comment@boardmantohemingway.com

From: raeannvanarsdall@gmail.com on behalf of Raeann VanArsdall <raeann@mommag.com>
Sent: Thursday, March 19, 2015 5:28 PM
To: comment@boardmantohemingway.com
Subject: Mason Van Arsdall - EIS B2H comments attached
Attachments: B2H EIS Comments_MV_March 2015.pdf

My comments regarding the EIS B2H comments are in the attached PDF file.

Mason Van Arsdall
541-908-2361
raeannvanarsdall@gmail.com

Text-only copy below, secondary to attached.

Mason Van Arsdall
Cell 541-908-2361
Email raeannvanarsdall@gmail.com
Tax lots: three
11S42E03200, 11S42E03500, 11S42E03600

Burnt River Ranch
31116 Burnt River Canyon Lane
Durkee, OR 97905
affected Private land condemned by the
Burnt River Mountain Alternative

Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."
comment@boardmantohemingway.com
Vale District Office
100 Oregon Street, Vale, Oregon 97918
P.O. Box 655, Vale, Oregon 97918
Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

B7a Statement: I am 12 years old and I am directly affected by the B2H line, today and in the future as the next generation of land owner and rancher in the Burnt River Valley in Durkee. The EIS written about the B2H, and specifically the Burnt River Mountain Alternative is an unfair and unbalanced report and should not be considered acceptable.

Purpose and need
The agency has not provided substantive support or stated their purpose and need for the project. The applicant has not demonstrated a need. There is a clear lack of purpose and need for this project. Any potential purpose and need are too narrow, unduly constraining the range of alternatives considered by the agency. The overall economic burden and burden on other uses is high and the applicant's need is low, which clearly tips the scales in favor of the no action alternative.
Reference to EIS: Summary, S-2, Lines 5 to 8
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There has never been a statement made with examples of what this line will be used for, or its benefits. When asked directly, Donald Gonzales from BLM responded.
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Reference to EIS: Summary, S-3, Line 5 – The USFS will decide whether to grant a special-use authorization on National Forest System lands.

1

B7a Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project, Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach) and to provide more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.

COMMENT(S)

RESPONSE(S)

B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

Reference to EIS: Summary, S-3, Line 18 – Other federal agencies may rely on the Draft EIS and Final EIS to make decisions regarding authorizing the use of lands they manage.
Lack of information to make determinations
Agency and applicant fail to provide enough information about the project to allow private land owners such as myself to make a decision on what the exact impact will be on our private property, our business and our community. We were not able to analyze potential impacts of the decision due to the lack of information.
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There was a complete lack of mitigation allowed in this decision, because there is a very clear option on public land less than five miles to the west of our private ground, which would also avoid nearly all of our neighbors along this Alternative. The points of crossing our private land, and that of our neighbors, are not inconsequential. The line crosses the heart of our property and of our irrigated ground, which directly affects more than 35%of our property and more than 50% of our irrigated ground. This is an unfair, unbalanced and unacceptable burden.
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2

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B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

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for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.
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Vegetation resources – The agency failed to adequately research the environmental impact on the vegetation resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action.
Wildlife resources – The agency failed to adequately research the environmental impact on the wildlife resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. The lack of research is event in the lack of correct information in reporting the current environmental situation.
Big game reported in this area includes mule deer, white-tailed deer, elk and big horn sheet. It omits antelope which are significantly prevalent. The EIS also lists that cliffs and talus areas are primarily utilized by the Big horn sheep. Yet the grasslands directly under the proposed Burnt River Mt. Alt. are the primary rutting grounds for the big horn sheep. These omissions of basic wildlife information, available from discussions with locals (and anyone driving on that road) clearly illustrates the lack of adequate research for this alternative. Reference to EIS: Summary, 3-257, Line 16.
Impact on the rutting and mating ground on our property for big horn sheep, bald eagles, and mule deer. There a photos of the big horn sheep herd during the rut at the proposed line site. The big horn sheep specifically gather during the rut in the grassland dry field on the north side of the road, across from our irrigated ground and in the line of the Burnt River Mt. Alt., which is also used during the mule deer and white tail deer rut season. The bald eagles mate annually in and among the trees along the Burnt River directly along the line. We have witnessed them annual for more than five years.
Visual resources – The agency failed to fairly and in a balanced manner research or report the environmental impact caused by the presence of large transmission towers. They will permanently damage visual resources, on both public and private ground. Reference to EIS: Summary, S-22, Line 10. Currently, the Burnt River Valley is picturesque, from the intersection of Hwy 30, throughout the valley, into the canyon and out the other side near Hereford. Residents of Baker County and beyond always exclaim when they learn where our home and Agri-tourism business is located, "That's one of the most beautiful locations in the state. I know exactly where that is. My family has visited that area for generations to hunt, gold mine, camp, explore…" This illustrates the strong historical and visual resource this valley and canyon are to the community and to the state of Oregon. On the public ground portion, mention has been made that it is zoned as a visual protected. We argue that that zone extends to
our private ground as well, and cannot be destroyed by "the presence of large transmission towers…" which would be blatantly seen on our open property, as opposed to the steep canyon within the zoned area, which would merely show lines – the towers would not be visible from the road. As it's currently placed, the towers and lines would impede the visual resources for my family (directly in front of our home window), our community, as well as for the citizens who travel to the Burnt River Canyon to enjoy its beauty – in both directions, as they are coming and going.
The agency failed to fairly and in a balanced manner research or report the economic impact caused by damaged visual resources. The long-term economic impact created by the presence of large transmission towers will permanently damage visual resources, and therefore permanently impact our Agri-tourism business. Reference to EIS: Summary, S-22, Line 10. Our alternant source of income is Agri-tourism, where paying guests visit our ranch to view the visual beauty that this Oregon destination has to offer, and experience the culture of the western and cowboy lifestyle still alive in this community. We have been building this business for more than five years, and continue to grow. This business will no longer exist with the Burnt River Mt. Alt. lines traversing our property. We will be long-term, permanently driven out of business. The fact is that tourists will not pay to look at, sleep under, or be active around the line. It's not pretty – and the fear of potential danger will further drive business away.
"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission
Cultural Resources – Reference to EIS: Summary, S-22, Line 15. And Summary, S-23, Table S-4
Example of cultural resources not researched
One example is the existence of historic Cairns within eye view and very close to the line. If I am able to collect and provide these detailed examples, the amount of undiscovered historical artifacts that would be disturbed by the construction and on-going existence of the B2H lines has clearly not been sufficiently researched. We are not professionals and we collected the following data within a week's time.

- Evidence: Photos of rock structures called cairns are attached.
- Location: Map of location is attached.

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B7 **Burnt River Ranch – March 19, 2015 [4] (cont.)**

• Personal interviews: We interviewed a local man who hunts and camps in the Burnt River Canyon frequently. He is a native descendant of the Nez Perce tribe and visits here to connect with his ancestors. He described the important of this canyon, the river, and the rocks to his ancestors. He explained that burials exist along the canyon and surrounding areas in the rock crevices. And that many cairns – rock structures – exist for hundreds of miles to use as "road signs" to direct people to the great gathering, trading and grazing area of the Burnt River Canyon and Valley. They are visible atop the peaks along the historical route. The visual impact the B2H lines create would be devastating and permanent.
Lack of follow-up on existing knowledge, example
Appendix A—Government-to-Government Tribal Consultation, on October 24, 2013 an email To: Renee Straub, Jennifer Theisen, and Shane Baker From: Catherine Dickson states:
"Concern with rock features reported by private land owners. Jennifer called the landowners and followed up with IPC; however the site, to date, has not been verified."
We did not receive interaction or have the opportunity to comment, as private land owners mentioned in the above email. At the meeting in Durkee, Doug Shook invited the BLM archeologist to take a tour either in ATVs or horseback to view and photograph the structures. No response was received and no visit was made. He acquired the attached photos himself.
Unbalanced scores, and lack of quality research
Reference to EIS: Summary, S-23, Table S-4
Burnt River Mountain Alternative has a "HIGH" Potential Impact Assessment; even though scores were based on RLS/Class I index scores only. Index scores could not be combined for those alternatives because no Class II survey was conducted along either the Proposed Action or alternative route.
Chapter3 – Land use and Agriculture
Agriculture: The agency failed to fairly and in a balanced manner research or report the environmental impact on agriculture by claiming that damage created by construction would be temporary and restricted to the areas of construction. Soil damage, as noted above, will be permanent. Refer to the soil comment above. Staff members trespassing on our private ground to conduct research stated in personal conversations that they were surveying the area for possible construction sites. They stated that to build a tower, plan to see damage done spread over five to ten times what is actual space needed for the actual structure, plus additional for access roads for large equipment. This lack of information provided does not allow me to make an accurate evaluation of what the level of damage will be, and the agency cannot either.
Reference to EIS: 3.2.6.3, 3-441, Lines 28-32: …could temporarily disrupt agricultural operations in the vicinity of construction…
The impact on this community and of the landowners is misrepresented.
The economic harm to my operation was not adequately characterized in the EIS because the unbalanced representation of private land owners and on the Burnt River Mt. Alt. is clear. On my farm alone I have invested $200,000 in improvements and structures that will be impacted by the transmission lines. The EIS does not account for those investments
Property Values Reference to EIS: Chapter 3, 3-922. Line 20
Approximately 71 percent of the land that would be crossed by the proposed B2H Project is privately 22 owned. The majority of land is owned privately, yet the agency has the decision making power, though they own only 22 percent of the impacted property. This burden is completely biased and must be made a fair playing field. This section is titled property values, though values are not discussed. There is a clear drop in property value. From my own personal experience, I purchased property with a powerline tower on it ten years ago. Because of the structure and lines, I negotiated a 35% drop in price, even though the structure was not visible from the home. I will not be able to retain my home, my business or my property when my property value drops by 35%. This big of a loss taken by land owners – combined with the complete imbalance of private vs. public lands and the decision being placed in the hands of agencies, and completely out of the hands of land owners is not acceptable.
Socioeconomic
Reference to EIS: Chapter 3, 3-897
To impact the economic income and livelihood of a community primarily made of land owners who are senior citizens and women is unethical and unaccounted for in the EIS. On our land, business alone:
Discrimination example: this three-generation business is owned by:
- women: grandmother, mother and daughter
- senior citizens: grandparents, sole source of income ages 71 and 68
- veteran: grandfather was Army Special Forces, served in Vietnam
Livability: Our current home site was built in 1922 and has been inhabited consistently since then, is directly impacted by the transmission lines, and our proposed new second home building site, construction to start in May
2015, is directly under the line. Example of insufficient information demonstrated by BLM staff at the Vale office on the phone said they needed to look up our property before discussing it, quote from Renee Straub (BLM Vale) "We did not know that anyone lived there – that there was a residence on that property."
Recreation and Tourism Reference to EIS: Chapter 3, 3-94. Line 26
This unbalanced level of research and reporting is clear when referring to recreation and tourism. Recreational events are listed, but tourism is not addressed. The economic impact on tourism is long term and permanent because the towers and lines are a permanent eyesore. In my business alone, we will lose long-time customers and the potential for any new customers. These eyesores will ruin tourism in our valley, permanently.
Public Health and Safety
Our home is in direct eye sight of the Burnt River Mountain Alternative, and is in very close proximity. Our proposed building site, beginning March 2015 is directly under the line. Our business operation requires that we operate directly under the line on a daily bases to irrigate, ride, check cattle, calve, feed, manage the stack yard, fix fences, and conduct Agri-tourism activities. These are all affected by the line in a negative way.

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B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

Noise Reference to EIS: Chapter 3, 3-953. Line 11
The agency failed to provide fair and balanced research along the Burnt River Mt. Alt – made evident in the noise research done along the road in at private residences of our neighbors, but never near our home or near the line location on our property. Other residences where tests were held are much further from the line than ours. Yet no testing was done on our property, or at our residence, which is .5 mile from the right of way.
Reference to EIS: Chapter 3, 3-953. Line 11 To analyze noise impacts, all structures within 0.5 mile of the edge of the proposed right-of-way were inventoried. The evaluation of noise energy created by the B2H Project involves an identification of the existing or ambient sound levels followed by a prediction of the future sound levels attributed to the B2H Project.
We called the BLM office and Vale to ask why we were not included in this testing, and were told that they were unaware of a residence on this property. We are on their mailing list and property address obviously public information. We are on their list of property owners. This blatant lack of research and knowledge make this EIS unfair and unbalanced for lack of resources, and lack of correct information.
Electrical Environment Reference to EIS: Chapter 3, 3-961. Line 24
Electrical fields will interfere or cause harm to nearby metal objects, such as vehicles, animal feeders, watering stations, or other equipment and fences. Personal experience: I have lived and raised and managed livestock under powerlines in Umatilla and Morrow counties previously. My personal experience shows that metal objects listed above do carry voltage and will shock people – I have been shocked from a metal livestock trailer – and livestock.
The line on the Burnt River Mt. Alt. that runs over our property crosses a large portion of irrigated ground where we flood irrigate by hand. Operating daily during the summer in live water with power lines overhead – along with my family and children – creates extreme fear.
Field Induction (Induced Currents and Nuisance Shocks) Reference to EIS: Chapter 3, 3-980. Line 9
Electromagnetic Interference to Cardiac Pacemakers Reference to EIS: Chapter 3, 3-986. Line 35
Human Health Effects of EMF Reference to EIS: Chapter 3, 3-987. Line 27
The fear of potential electrical fields effecting or causing harm to people, livestock, wildlife – will have a permanent effect on our business and our livelihood as an Agri-tourism business. Tourists do not want to pay to stay so near transmission lines, and will be driven away due to fear. This economic impact will be permanent, long-term and irreparable.
"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission Lines
Link = http://headwaterseconomics.org/library/files/AppraisalGroupOne;ValuationGuidelines.pdf
Chapter 4 – Consultation and Coordination
The list of agencies and organizations consulted, and the cooperation shown to protect those they represent is evident. Those all represent mostly public lands, which make up approximately 23%of the line. The other 77% of the line impacts private land owners. The EIS is unbalanced and unfair because it does not describe who is protecting and coordinating in the interest of private land owners. Nor does it describe an equal amount of planning to incorporate the private land owners into the process to learn and glean important information needed to be informed about 77% of the land where the line will run. Nor does it address attempts to mitigate situations that may arise in that process.
Harmful personal agency staff comments
I was told by Donald Gonzales (Vale BLM), during a personal visit to my property. "Do not get an attorney. It will be very expensive and complicate the process even further. At this point it's just not a good idea, and a waste of money for you." This advice is extremely harmful to our situation because the EIS is an incredibly complicated document, as is the commenting procedure. This suggestion not to seek legal guide has deeply hurt our ability to state our situation and provide comments within the official guidelines.
Mitigation
I am a land owner and I am open to mitigation on the location the line, as it pertains to my privately owned land, and ways to alleviate the many detrimental items listed above. I have seen a lack of willingness to mitigate these items from the agency, as many of the items listed above have been discussed in length with the agency and are omitted from the EIS, specifically related to the Burnt River Mountain Alternative.

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B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

Mason Van Arsdall
Cell 541-908-2361
Email raeannvanarsdall@gmail.com
Tax lots: three affected
11S42E03200, 11S42E03500,11S42E03600

Burnt River Ranch
31116 Burnt River Canyon Lane
Durkee, OR 97905
Private land condemned by the
Burnt River Mountain Alternative

Addressed to: "Boardman to Hemingway Transmission Line Project Draft EIS."
comment@boardmantohemingway.com
Vale District Office
100 Oregon Street, Vale, Oregon 97918
P.O. Box 655, Vale, Oregon 97918

Regarding: Official Comments "Boardman to Hemingway Transmission Line Project Draft EIS."

Statement: I am 12 years old and I am directly affected by the B2H line, today and in the future as the next generation of land owner and rancher in the Burnt River Valley in Durkee. The EIS written about the B2H, and specifically the Burnt River Mountain Alternative is an unfair and unbalanced report and should not be considered acceptable.

Purpose and need
The agency has not provided substantive support or stated their purpose and need for the project. The applicant has not demonstrated a need. There is a clear lack of purpose and need for this project. Any potential purpose and need are too narrow, unduly constraining the range of alternatives considered by the agency. The overall economic burden and burden on other uses is high and the applicant's need is low, which clearly tips the scales in favor of the no action alternative.

Reference to EIS: Summary, S-2, Lines 5 to 8
The B2H Project is neither required to support any particular new power generation project nor justified by any particular existing power generation project. Rather, the B2H Project would meet IPC's obligations to meet Federal Energy Regulatory Commission, Oregon Public Utility Commission, and the Idaho Public Utility Commission requirements.

Statements showing lack of need, made by agency staff
There has never been a statement made with examples of what this line will be used for, or its benefits. When asked directly, Donald Gonzales from BLM responded.
Question asked by me in person on our property, and again by my family in a meeting in Durkee:
"If a need for use and benefits can be stated clearly, illustrating how this B2H line will benefit me, my family, my business, my community, my county, my state or even my country – perhaps we could fairly discuss the project and determine how to mitigate environmental and economic challenges. What are the benefits?"
Donald Gonzales responded that the benefits are not clear. There may be a fire department added in Baker City, Oregon. But the local benefits to your community or your family cannot be described. The need for this cannot be described.

Decisions by agencies for public land right of way. There is unfair and unbalanced lack of research and support to determine the need or grant right-of-way on my privately owned land.
There is no reference to who makes decisions regarding authorizing the use of my land that I manage.
Reference to EIS: Summary, S-3, Line 1 – The BLM will decide whether or not to grant the requested right-of-way on public lands.

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B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

Reference to EIS: Summary, S-3, Line 5 – The USFS will decide whether to grant a special-use authorization on National Forest System lands.
Reference to EIS: Summary, S-3, Line 18 – Other federal agencies may rely on the Draft EIS and Final EIS to make decisions regarding authorizing the use of lands they manage.

Lack of information to make determinations
Agency and applicant fail to provide enough information about the project to allow private land owners such as myself to make a decision on what the exact impact will be on our private property, our business and our community. We were not able to analyze potential impacts of the decision due to the lack of information. Items that may cross and impede our land, but have not been detailed, include high voltage lines, towers, helicopter landing zones, and items that I cannot possible understand or foresee. Representatives from the applicant and from a wide variety of agencies who have trespassed onto our property for their unannounced studies and research have mentioned these options and countless others. This makes it impossible for us to determine the exact financial or environmental impact, and therefore state or defend our stance on the EIS.

Addressing alternatives
There were important practical and feasible alternatives the agency did not include.

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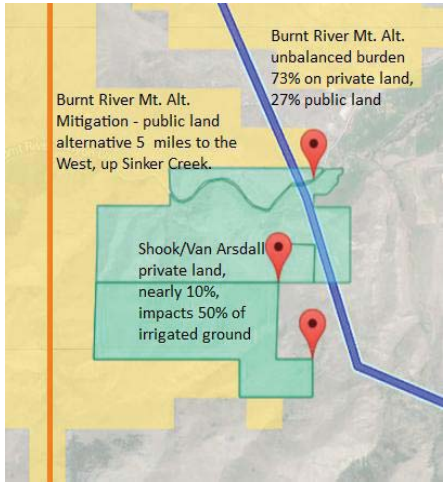

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B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

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The economic impact caused by stream damage to drinking water and damage to irrigation systems on two irrigation districts (we are the headgate for both irrigation districts in the Burnt River valley) will affect the entire community, and cost our business alone, more than $100,000 per year permanently because we'll have to decrease our herd size by more than 50%, and therefore our annual income is cut by more than 50%. Our small number of irrigated acres will only carry 100 head of cattle pairs, losing 50% of our irrigated grazing will cause irreparable damage to our business. And we'll have to buy hay for the remaining number of cattle because 100% of our hay production comes from the area currently identified for the Burnt River Mt. Alt.

Vegetation resources – The agency failed to adequately research the environmental impact on the vegetation resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action.

Wildlife resources – The agency failed to adequately research the environmental impact on the wildlife resources along the Burnt River Mt. Alt. The information is completely unbalanced with that done for the Proposed Action. The lack of research is event in the lack of correct information in reporting the current environmental situation. Big game reported in this area includes mule deer, white-tailed deer, elk and big horn sheet. It omits antelope which are significantly prevalent. The EIS also lists that cliffs and talus areas are primarily utilized by the Big horn sheep. Yet the grasslands directly under the proposed Burnt River Mt. Alt. are the primary rutting grounds for the big horn sheep. These omissions of basic wildlife information, available from discussions with locals (and anyone driving on that road) clearly illustrates the lack of adequate research for this alternative.
Reference to EIS: Summary, 3-257, Line 16.
Impact on the rutting and mating ground on our property for big horn sheep, bald eagles, and mule deer. There a photos of the big horn sheep herd during the rut at the proposed line site. The big horn sheep specifically gather during the rut in the grassland dry field on the north side of the road, across from our irrigated ground and in the line of the Burnt River Mt. Alt., which is also used during the mule deer and white tail deer rut season. The bald eagles mate annually in and among the trees along the Burnt River directly along the line. We have witnessed them annual for more than five years.

Visual resources – The agency failed to fairly and in a balanced manner research or report the environmental impact caused by the presence of large transmission towers. They will permanently damage visual resources, on both public and private ground. Reference to EIS: Summary, S-22, Line 10. Currently, the Burnt River Valley is picturesque, from the intersection of Hwy 30, throughout the valley, into the canyon and out the other side near Hereford. Residents of Baker County and beyond always exclaim when they learn where our home and Agri-tourism business is located, "That's one of the most beautiful locations in the state. I know exactly where that is. My family has visited that area for generations to hunt, gold mine, camp, explore…" This illustrates the strong historical and visual resource this valley and canyon are to the community and to the state of Oregon. On the public ground portion, mention has been made that it is zoned as a visual protected. We argue that that zone extends to our private ground as well, and cannot be destroyed by "the presence of large transmission towers…" which would be blatantly seen on our open property, as opposed to the steep canyon within the zoned area, which would merely show lines – the towers would not be visible from the road. As it's currently placed, the towers and lines

ATTACHMENT

B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

would impede the visual resources for my family (directly in front of our home window), our community, as well as for the citizens who travel to the Burnt River Canyon to enjoy its beauty – in both directions, as they are coming and going.

The agency failed to fairly and in a balanced manner research or report the economic impact caused by damaged visual resources. The long-term economic impact created by the presence of large transmission towers will permanently damage visual resources, and therefore permanently impact our Agri-tourism business. Reference to EIS: Summary, S-22, Line 10. Our alternant source of income is Agri-tourism, where paying guests visit our ranch to view the visual beauty that this Oregon destination has to offer, and experience the culture of the western and cowboy lifestyle still alive in this community. We have been building this business for more than five years, and continue to grow. This business will no longer exist with the Burnt River Mt. Alt. lines traversing our property. We will be long-term, permanently driven out of business. The fact is that tourists will not pay to look at, sleep under, or be active around the line. It's not pretty – and the fear of potential danger will further drive business away.

"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission

Cultural Resources – Reference to EIS: Summary, S-22, Line 15. And Summary, S-23, Table S-4

Example of cultural resources not researched
One example is the existence of historic Cairns within eye view and very close to the line. If I am able to collect and provide these detailed examples, the amount of undiscovered historical artifacts that would be disturbed by the construction and on-going existence of the B2H lines has clearly not been sufficiently researched. We are not professionals and we collected the following data within a week's time.

- Evidence: Photos of rock structures called cairns are attached.
- Location: Map of location is attached.
- Personal interviews: We interviewed a local man who hunts and camps in the Burnt River Canyon frequently. He is a native descendant of the Nez Perce tribe and visits here to connect with his ancestors. He described the important of this canyon, the river, and the rocks to his ancestors. He explained that burials exist along the canyon and surrounding areas in the rock crevices. And that many cairns – rock structures – exist for hundreds of miles to use as "road signs" to direct people to the great gathering, trading and grazing area of the Burnt River Canyon and Valley. They are visible atop the peaks along the historical route. The visual impact the B2H lines create would be devastating and permanent.

Lack of follow-up on existing knowledge, example
Appendix A—Government-to-Government Tribal Consultation, on October 24, 2013 an email To: Renee Straub, Jennifer Theisen, and Shane Baker From: Catherine Dickson states:
"Concern with rock features reported by private land owners. Jennifer called the landowners and followed up with IPC; however the site, to date, has not been verified."
We did not receive interaction or have the opportunity to comment, as private land owners mentioned in the above email. At the meeting in Durkee, Doug Shook invited the BLM archeologist to take a tour either in ATVs or horseback to view and photograph the structures. No response was received and no visit was made. He acquired the attached photos himself.

Unbalanced scores, and lack of quality research
Reference to EIS: Summary, S-23, Table S-4

ATTACHMENT

B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

Burnt River Mountain Alternative has a "HIGH" Potential Impact Assessment; even though scores were based on RLS/Class I index scores only. Index scores could not be combined for those alternatives because no Class II survey was conducted along either the Proposed Action or alternative route.

Chapter3 – Land use and Agriculture

Agriculture: The agency failed to fairly and in a balanced manner research or report the environmental impact on agriculture by claiming that damage created by construction would be temporary and restricted to the areas of construction. Soil damage, as noted above, will be permanent. Refer to the soil comment above. Staff members trespassing on our private ground to conduct research stated in personal conversations that they were surveying the area for possible construction sites. They stated that to build a tower, plan to see damage done spread over five to ten times what is actual space needed for the actual structure, plus additional for access roads for large equipment. This lack of information provided does not allow me to make an accurate evaluation of what the level of damage will be, and the agency cannot either.
Reference to EIS: 3.2.6.3, 3-441, Lines 28-32: …could temporarily disrupt agricultural operations in the vicinity of construction…

The impact on this community and of the landowners is misrepresented.
The economic harm to my operation was not adequately characterized in the EIS because the unbalanced representation of private land owners and on the Burnt River Mt. Alt. is clear. On my farm alone I have invested $200,000 in improvements and structures that will be impacted by the transmission lines. The EIS does not account for those investments

Property Values Reference to EIS: Chapter 3, 3-922. Line 20
Approximately 71 percent of the land that would be crossed by the proposed B2H Project is privately 22 owned. The majority of land is owned privately, yet the agency has the decision making power, though they own only 22 percent of the impacted property. This burden is completely biased and must be made a fair playing field. This section is titled property values, though values are not discussed. There is a clear drop in property value. From my own personal experience, I purchased property with a powerline tower on it ten years ago. Because of the structure and lines, I negotiated a 35% drop in price, even though the structure was not visible from the home. I will not be able to retain my home, my business or my property when my property value drops by 35%. This big of a loss taken by land owners – combined with the complete imbalance of private vs. public lands and the decision being placed in the hands of agencies, and completely out of the hands of land owners is not acceptable.

Socioeconomic
Reference to EIS: Chapter 3, 3-897
To impact the economic income and livelihood of a community primarily made of land owners who are senior citizens and women is unethical and unaccounted for in the EIS. On our land, business alone:

Discrimination example: this three-generation business is owned by:
- women: grandmother, mother and daughter
- senior citizens: grandparents, sole source of income ages 71 and 68
- veteran: grandfather was Army Special Forces, served in Vietnam

Livability: Our current home site was built in 1922 and has been inhabited consistently since then, is directly impacted by the transmission lines, and our proposed new second home building site, construction to start in May 2015, is directly under the line. Example of insufficient information demonstrated by BLM staff at the Vale office on

ATTACHMENT

B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

the phone said they needed to look up our property before discussing it, quote from Renee Straub (BLM Vale) "We did not know that anyone lived there – that there was a residence on that property."

Recreation and Tourism Reference to EIS: Chapter 3, 3-94. Line 26
This unbalanced level of research and reporting is clear when referring to recreation and tourism. Recreational events are listed, but tourism is not addressed. The economic impact on tourism is long term and permanent because the towers and lines are a permanent eyesore. In my business alone, we will lose long-time customers and the potential for any new customers. These eyesores will ruin tourism in our valley, permanently.

Public Health and Safety

Our home is in direct eye sight of the Burnt River Mountain Alternative, and is in very close proximity. Our proposed building site, beginning March 2015 is directly under the line. Our business operation requires that we operate directly under the line on a daily bases to irrigate, ride, check cattle, calve, feed, manage the stack yard, fix fences, and conduct Agri-tourism activities. These are all affected by the line in a negative way.

Noise Reference to EIS: Chapter 3, 3-953. Line 11
The agency failed to provide fair and balanced research along the Burnt River Mt. Alt – made evident in the noise research done along the road in at private residences of our neighbors, but never near our home or near the line location on our property. Other residences where tests were held are much further from the line than ours. Yet no testing was done on our property, or at our residence, which is .5 mile from the right of way.

Reference to EIS: Chapter 3, 3-953. Line 11 To analyze noise impacts, all structures within 0.5 mile of the edge of the proposed right-of-way were inventoried. The evaluation of noise energy created by the B2H Project involves an identification of the existing or ambient sound levels followed by a prediction of the future sound levels attributed to the B2H Project.

We called the BLM office and Vale to ask why we were not included in this testing, and were told that they were unaware of a residence on this property. We are on their mailing list and property address obviously public information. We are on their list of property owners. This blatant lack of research and knowledge make this EIS unfair and unbalanced for lack of resources, and lack of correct information.

Electrical Environment Reference to EIS: Chapter 3, 3-961. Line 24
Electrical fields will interfere or cause harm to nearby metal objects, such as vehicles, animal feeders, watering stations, or other equipment and fences. Personal experience: I have lived and raised and managed livestock under powerlines in Umatilla and Morrow counties previously. My personal experience shows that metal objects listed above do carry voltage and will shock people – I have been shocked from a metal livestock trailer – and livestock.

The line on the Burnt River Mt. Alt. that runs over our property crosses a large portion of irrigated ground where we flood irrigate by hand. Operating daily during the summer in live water with power lines overhead – along with my family and children – creates extreme fear.

Field Induction (Induced Currents and Nuisance Shocks) Reference to EIS: Chapter 3, 3-980. Line 9
Electromagnetic Interference to Cardiac Pacemakers Reference to EIS: Chapter 3, 3-986. Line 35
Human Health Effects of EMF Reference to EIS: Chapter 3, 3-987. Line 27
The fear of potential electrical fields effecting or causing harm to people, livestock, wildlife – will have a permanent effect on our business and our livelihood as an Agri-tourism business. Tourists do not want to pay to stay so near transmission lines, and will be driven away due to fear. This economic impact will be permanent, long-term and irreparable.

ATTACHMENT

B7 Burnt River Ranch – March 19, 2015 [4] (cont.)

"Whether the danger is a scientifically genuine or verifiable fact should be irrelevant to the central issue of its market value impact." The very existence of a debate about the safety of EMFs sows enough doubt to justify the fear. And that fear will influence values.
*Source: headwaterseconomics.org, Valuation Guidelines for Properties with Electric Transmission Lines
Link = http://headwaterseconomics.org/library/files/AppraisalGroupOne;ValuationGuidelines.pdf

Chapter 4 – Consultation and Coordination

The list of agencies and organizations consulted, and the cooperation shown to protect those they represent is evident. Those all represent mostly public lands, which make up approximately 23%of the line. The other 77% of the line impacts private land owners. The EIS is unbalanced and unfair because it does not describe who is protecting and coordinating in the interest of private land owners. Nor does it describe an equal amount of planning to incorporate the private land owners into the process to learn and glean important information needed to be informed about 77% of the land where the line will run. Nor does it address attempts to mitigate situations that may arise in that process.

Harmful personal agency staff comments
I was told by Donald Gonzales (Vale BLM), during a personal visit to my property. "Do not get an attorney. It will be very expensive and complicate the process even further. At this point it's just not a good idea, and a waste of money for you." This advice is extremely harmful to our situation because the EIS is an incredibly complicated document, as is the commenting procedure. This suggestion not to seek legal guide has deeply hurt our ability to state our situation and provide comments within the official guidelines.

Mitigation
I am a land owner and I am open to mitigation on the location the line, as it pertains to my privately owned land, and ways to alleviate the many detrimental items listed above. I have seen a lack of willingness to mitigate these items from the agency, as many of the items listed above have been discussed in length with the agency and are omitted from the EIS, specifically related to the Burnt River Mountain Alternative.

COMMENT(S)

RESPONSE(S)

B8 **Cunningham Sheep Company**

comment@boardmantohemingway.com

From: Steve Corey <corey@corey-byler.com>
Sent: Thursday, March 19, 2015 4:37 PM
To: comment@boardmantohemingway.com
Cc: Bob Levy (boblevy@windyriverfarms.com)
Subject: B2H Project Letter - Cunningham Sheep Company Comments
Attachments: MX-2700N_20150319_180537.pdf

I attach the letter of Cunningham Sheep Company and Pendleton Ranches, as their comments relating to the DEIS and the B2H transmission line project and Idaho Power Company. Please consider the letter. Thank you. Steve Corey, Secretary, Cunningham Sheep Company and Pendleton Ranches, Inc.

Steven H. Corey
Pendleton Ranches, Inc.
P.O. Box 1186
Pendleton, Oregon 97801
corey@corey-byler.com
541-2976-6391

****
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COMMENT(S)

B8 **Cunningham Sheep Company (cont.)**

CUNNINGHAM SHEEP & LAND COMPANY
PENDLETON RANCHES, INC.
MUD SPRINGS RANCHES
HOKE RANCHES

CUNNINGHAM SHEEP COMPANY

303 S.E. 3RD STREET P.O. BOX 1186
541-276-6391
PENDLETON, OREGON 97801

March 19, 2015

B2H Project
P. O. Box 655
Vale, OR 97918

Re: B2H Transmission Line Project
Comments on the DEIS

I submit the following comments on behalf of Cunningham Sheep Company, Pendleton Ranches, Inc., and other companies above identified across which Idaho Power proposes to construct, operate and maintain a new 500 KV electric transmission line. Our properties are on the B2H maps, west of Meacham and southeast of Echo, in Umatilla County, Oregon.

B8a 1. Another alternative route. The transmission corridor not yet studied, which must be studied, is the existing transmission corridor that primarily follows Interstate 84 through Umatilla County. With BPA participation now in the scheduled B2H transmission line, it only make sense that (a) the existing BPA line be studied to determine if it, by itself, also could take a 500 KV line, or with only slight adjustment to the right-of-way, could add a 500 KV line. For our companies, while this would not eliminate resource impacts because a portion of the 230 KV line goes through our property, at least preliminarily it may have a less adverse impact and still would fulfill the alleged project need.

B8b We believe another alternative also should be thoroughly studied. We believe the project would minimize adverse impacts to our land resources if it came across federal lands in Grant County, Oregon, and north continuing across federal lands directly to the

RESPONSE(S)

B8a Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Colocation with existing utilities is given preference where feasible. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

B8b See response to Comment B8a.

COMMENT(S)

B8 **Cunningham Sheep Company (cont.)**

B2H Project
March 19, 2015
Page 2

B8b Boardman area. In short, we do not feel this line needs to go through Umatilla County, Oregon. This alternative would substantially reduce adverse agricultural and recreational impacts for our properties, as well as for other properties in Umatilla County, Oregon.

B8c 2. Alternative methodologies that should be used. The "human element" should be given equal or greater weight to the project analysis than threatened or endangered species. See the written comments submitted to you on March 18, 2015 by the Board of Commissioners of Umatilla County, Oregon. I appeared as one of the witnesses at their public hearing. I incorporate herewith their comments as a part of this submission. Not only is there not a significant benefit to Umatilla County from this project, but the interruption of this project to the humans (be those persons farmers, ranchers, or other citizens) has been enormous. Visual impacts that will be permanent if the transmission line is constructed, will interrupt the recreational habits of citizens, including our family. Mushrooming areas, picnicking areas, hiking areas, snowshoeing areas, and future cabin building and picnicking areas will be significantly interrupted. The presence of a 500 kilowatt transmission line, in our instance in the Meacham area, will prevent our family from being able to build cabins and do normal activities on the lands across which the line is planned. Further, because Idaho Power continues to delay and micromanages the final location of the project, neighbors have been pitted against neighbors to say the line ought to go on their lands and not on our lands. Disruptions caused by survey crews, planners, and ultimately construction crews and then the presence of the line itself will have a permanent, adverse impact upon us and upon all people. Humans have an equal or even greater weight in the consideration of the placement of this line, in our view, than anything else.

B8d

B8e

B8f 3. Threatened species. Our bottomlands have a historic presence of the Washington Ground Squirrel. Although we have permitted Idaho Power to conduct surveys of our lands, and although we requested copies of the surveys, we have not seen anything.

RESPONSE(S)

B8c While federal land-managing agencies do not have authority over nonfederal lands, federal agencies do have an obligation to disclose effects of its decisions on lands and resources affected by the decision. Therefore, the BLM uses the same systematic, defensible approach on all lands, regardless of jurisdiction, and for all resources, to analyze and compare the alternative routes, using consistent data and approach. In addition, as the lead federal agency for the EIS, the BLM is the federal steward for federally protected resources on all lands such as cultural resources (under Section 106 of the NHPA), biological resources (under Section 7 of the ESA), and paleontological resources (under the Paleontological Resources Protection Act). Thus, the EIS must include documentation of compliance with these laws and associated regulations and policies. However, this does not mean that the natural resources protected by these laws are weighted differently than other resources considered.

B8d Comments noted.

B8e Comment noted.

B8f Comment noted. The analysis of impacts on Washington ground squirrel habitat is presented in Chapter 3, Section 3.2.4.

COMMENT(S)

RESPONSE(S)

B8 **Cunningham Sheep Company (cont.)**

B2H Project
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B8g Our lands near Meacham contain large numbers of elk. Since that area is a calving area for elk, and since the new transmission line will take a 250-foot swath of forested timberland across our property, we are uncertain how much damage the elk herds will suffer. We regularly hunt the areas proposed for the transmission line, both as a family and now in a guided elk hunting program. We anticipate significant damage.

4. Umatilla County, Oregon objections and comments. The Board of Commissioners of Umatilla County, Oregon submitted written comments and exhibits to you yesterday. We incorporate those comments in this letter, as though fully set forth herein. We see no significant benefit to Umatilla County from this project. B8h We prefer the line take an alternate route and avoid Umatilla County. If the line does come through Umatilla County, it should primarily follow Interstate 84 which is an existing corridor. B8i We are a timber, wheat, cattle and sheep operation. Agriculture is the foundation of the economics of our corporations. We feel our valuable timber and farmlands must be preserved, and believe the DEIS lacks sufficiency of detail to account accurately for impacts to agriculture and to our lands. We believe the cumulative impacts to the natural, human, and cultural environment as required by the National Environmental Policy Act have not been measured and met.

5. Mitigation. B8j If the 500 KV transmission line must be constructed across Umatilla County, we point out one measure of economic mitigation that could be done by Idaho Power is to plan for and install a substation along the line in the vicinity, or upon our property southeast of Echo. This at one point in time was studied by personnel of Idaho Power, I personally was present during the study, and two satisfactory sites were identified by the field man. Benefits to the farmers and ranchers could occur by providing a hook-on point through the substation for future wind projects.

B8k 6. Micrositing. If the proposed line is put in as most recently planned by Idaho Power, across our properties near

B8g Comment noted. The Applicant has committed to design features and site-specific selective mitigation measures designed to minimize anticipated B2H Project effects to elk such as seasonal and spatial restrictions, creation of a Plan of Development that includes a Biological Resources Conservation Plan, and limiting new or improved accessibility to sensitive habitat.

B8h Comment noted. See response to Comment B8a.

B8i Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes. More specifically, the analysis of impacts on agriculture in the Final EIS has been expanded to include a quantitative analysis of important farmland, high-value soils, irrigated farmland, existing agriculture, and cumulative impacts. Refer to Sections 3.2.7 and 3.3.3.7. Also, the economic analysis in Section 3.2.17 of the Final EIS includes how surface disturbances affecting timber and agricultural production affect local economic conditions. Cumulative effects on the natural, human, and cultural environment have been expanded in Sections 3.3.

B8j The suggested measure does not meet the Applicant's interest and objectives for the B2H Project.

It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized and approved as appropriate by the Public Utilities Commission in each state. The Applicant's goals and objectives for a project are outlined in their IRP, which is updated every two years and can be found at http://www.pacificorp.com/es/irp.html.

B8k Input from the landowner and the impact on property will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

COMMENT(S)

RESPONSE(S)

B8 **Cunningham Sheep Company (cont.)**

B2H Project
March 19, 2015
Page 4

B8k Meacham, it should not be placed so as to cause an undue burden upon our properties as compared to those of our neighbor. We have addressed this matter with Idaho Power, but Idaho Power has not indicated it will change its present layout.

Thank you for allowing us to comment on the DEIS.

Sincerely yours,

Steven H. Corey
Secretary-Treasurer

SHC:m
cc: Mr. Bob Levy

Mailed by First Class Mail
and also e-mailed on this date

COMMENT(S)

RESPONSE(S)

B9 **Elements of Health**

Elements of Health Inc.
Jill Schumacher, BD, DNM & Meredith McCord, BD, DNM
(Doctorates in Bioenergetic Medicine and Doctorates in Natural Medicine
42659 SunnySlope Road
Baker City, Or 97814

B2H Transmission Line Project

P.O. Box 655

Vale, OR 97919

Sent Certified Mail with Signature Return Receipt Requested

Re: B2H-BLM DEIS Comments

Our comments and concerns for the B2H project through the Sunnyslope Area of Baker County are as follows:

Issue 1 Economic Impact

B9a

As owners and practitioners of Elements of Health, Inc. located in the Ranch Cabin Clinic at 42659 Sunnyslope Road, we are grievously concerned regarding the projected impacts of the proposed 500kV transmission line upon our ability to continue to provide services at this location.

Elements of Health, Inc. offers services in stress management and health promotion. The Biofeedback technology and power source that is used in our services is vulnerable to the electrical and electromagnetic effects and artifacts that are emitted by extra high power voltage lines. The "dirty" electricity that is emitted and the electromagnetic and magnetic

B9a

Comments noted. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP), for guidance and guidelines regarding EMF. EMF is discussed in greater detail in Section 3.2.18. As identified in design features of the Proposed Action (Table 2-7, Design Feature), the Applicant would continue to address public health and safety throughout the life of the B2H Project.

The Final EIS is not intended to serve as an appraisal of the project's impact on property value for individual parcels. Input from the landowner and the impact on property rights will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

COMMENT(S)

B9 **Elements of Health**

fields that are created by extra high power voltage lines interferes with the accuracy of the data that is collected using this scientific instrumentation. This high power field effect would also contaminate homeopathic remedies that are contaminated by high power voltage lines. Because of these reasons, we believe that we would no longer be able to offer our services at this site because of the close proximity to the proposed power lines.

B9a This would have a significant impact on our availability to the clients that we serve that includes the community of Baker City/County and surrounding regions of eastern/northeastern Oregon, southeast Washington and western Idaho. We also serve clients from British Columbia, Montana and California. Traveling outside of this geographical area to access these services would place an undue hardship, personally and economically, on our clients.

The economic impact on Elements of Health, Inc. would be substantial. It is estimated that the loss of revenue generation would be approximately $1,400,000 over a 10 year period. This would derogatorily impact our ability to provide a livelihood for ourselves.

Solutions:

1- **Select the No Action Alternative** which was not considered in the DEIS. Deny Idaho Power's request to build a 500kV transmission line from Hemingway to Boardman. It does not offer any direct benefit to the citizens of Baker County. The long-term impact of this "transmission highway" will negatively affect the health of the community, agriculture and our economic livelihood.

B9b 2- **If the 500kV transmission has to be built at all, place it on the Central Oregon Utility Corridor** that goes from the California border through central Oregon to the Washington border. It is already designated for this purpose and makes wise use of Oregon land.

Page **2** of **8**

RESPONSE(S)

B9b Use of this suggested corridor for the B2H Project does not meet the Applicant's interest and objectives for the B2H Project and is not a reasonable alternative.

COMMENT(S)

B9 **Elements of Health**

3- If the route has to come through Baker County, then locate it on the proposed Virtue Flat route. It is away from the valley's viewshed, behind NHOTIC, and a distance from interference with humans and our biofeedback technology.

Issue 2 Public Health and Safety

B9c

We are concerned regarding the health hazards associated with placements of B2H extra high power voltage lines (500kV) near areas of human habitation. (Note: extra high is 230-800 range)

Siting high power voltage lines near human habitation would not be suitable because of the broad and far reaching human health hazards and adverse health impact reflected in epidemiological health data of communities in proximity of extra high power voltage lines.

Firstly, we acknowledge that controversy between the corporate utilities, medical scientific research, EPA and others continues regarding the level of health hazards produced by EMF emitted by extra high power lines. Some of the areas of research have produced contradictory results. It has been suggested that this public health issue has been understudied and the criteria for determining health risk has not been comprehensive enough or consistent with the bio-physiology of the human being and that the instrumentation that measures EMF and other types of power line pollutants are not sensitive enough within the context of human health. Some of the research has focused on limited frequency ranges that miss a whole spectrum of other potentially harmful emissions/pollution. It has also been suggested that the various governmental, corporate utility groups involved are influenced by motives that may not place individuals, communities and health issues as their highest priorities.

B9d

We would also like to acknowledge that there are multiple medical and scientific studies that have been published in the peer reviewed medical

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RESPONSE(S)

B9c

This section has been revised for clarity. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP), for guidance and guidelines regarding EMF. EMF is discussed in greater detail in Section 3.2.18. As identified in design features of the Proposed Action (Table 2-7, Design Feature), the Applicant would continue to address public health and safety throughout the life of the B2H Project.

B9d

Scientific agencies have concluded that the research is not strong enough to support the conclusion that EMF is the cause of any disease, including cancer. The data related to childhood leukemia has been characterized as limited and insufficient to provide a basis to conclude that magnetic fields are a cause of this disease. Scientific agencies have recommended additional research to clarify findings, as well as low-cost measures to reduce exposure.

The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP), for guidance and guidelines regarding EMF. EMF is discussed in greater detail in Section 3.2.18. As identified in design features of the Proposed Action (Table 2-7, Design Feature), the Applicant would continue to address public health and safety throughout the life of the B2H Project.

COMMENT(S)

RESPONSE(S)

B9 **Elements of Health (cont.)**

B9d

literature that have shown that children living in homes near high voltage or high current power lines, as well as workers exposed to power-frequency electromagnetic fields on the job, are developing cancer at significantly higher rates than children and workers who are not exposed or who are less exposed. (See copy of the transcript of Paul Brodeur's testimony before Nebraska Legislature that reviews the evidence that power line EMF's cancer link is conclusive as presented in the medical literature.)

For instance, a pool analysis of raw data from 9 different electromagnetic studies have found that children exposed to ≥ 4 mG EMF magnetic field exposure were 2X as likely to develop leukemia than children non-exposed.

Another study demonstrated that the incidence of childhood leukemia doubled within 100 meters of high voltage lines. Another study suggests that 69% increased risk within 200m while an increased risk of 23% was found for children living within 200-600 meters. An EPA study published that extremely low-frequency fields be classified as probable human carcinogens. A draft report by the EPA contained a persuasive indictment of power line magnetic field as a cancer-producing agent. Authors have stated that 5 of the 6 case-controlled studies published in peer reviewed medical literature showed that children who lived near power lines giving off strong magnetic fields were developing cancer more readily than children who did not live near power lines.(4)

Daniel Wartenberg of the Robert Wood Johnson Medical School has acknowledged the relationship between EMF and childhood leukemia following medical science literature reviews.

In addition to the undeniable link to childhood leukemia, there are other research studies that address cancer and other health concerns. We have summarized several here, as follows:

Page 4 of 8

COMMENT(S)

B9 **Elements of Health (cont.)**

B9e

According to Magda Havas Ph D Associate Professor of Environmental and Resource Studies at Trent University there are clear links to Breast cancer. Especially between fields of 2- 12 mG are critical for adults with estrogen sensitive breast cancer.

Prostate cancer: EMF of power lines can cause cells to react in the same way that cancer cells act by the change in the rate at which cells divide and differentiate.

EMF has also been linked with lymphomas and nervous system disorders as well as various reproductive abnormalities.

EMF exposure may promote cancer by impairing apoptosis which is the cellular self-destruction mechanism that normally prevents precancerous cells from becoming malignant.

Brain cancer- 6mG magnetic field increased by a factor of 12 their odds of developing an aggressive brain tumor known as glioblastoma multiforme.

Inhibits production of melatonin, a hormone that suppresses cancer and is involved in other adverse health effects. US National Council on Radiation Protection suggests EMF ≥ 12 mG interferes with melatonin production and its ability to inhibit the formation of cancer particularly breast cancer.

In a study by physicists at Britain's University of Bristol, findings demonstrate that power lines attract radon, a known carcinogen.

In addition to the cancer link with EMF and high power lines, we have outlined some of the following health issues that have been associated with EMF exposure from extra high power lines.

B9f

High voltage lines can potentiate the concentration of air pollutants by their very nature as a magnetic attractant:

> Electrically charged particles called corona ions that attach themselves to airborne pollutants such as exhaust fumes,

Page 5 of 8

RESPONSE(S)

B9e

Scientific agencies have concluded that the research is not strong enough to support the conclusion that EMF is the cause of any disease, including cancer. The data related to childhood leukemia has been characterized as limited and insufficient to provide a basis to conclude that magnetic fields are a cause of this disease. Scientific agencies have recommended additional research to clarify findings, as well as low-cost measures to reduce exposure.

B9f

The Public Health and Safety section (Section 3.2.18) has been revised for clarity. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP), for guidance and guidelines regarding EMF. EMF is discussed in greater detail in Section 3.2.18. As identified in design features of the Proposed Action (Table 2-7, Design Feature), the Applicant would continue to address public health and safety throughout the life of the B2H Project.

COMMENT(S)

RESPONSE(S)

B9 **Elements of Health (cont.)**

formaldehyde, and other hazardous chemicals, giving them electrical charges and increasing the likely hood of being deposited in the lungs.

Airborne pollutants are deposited on the skin at a threefold increase on people living or working near electricity pylons.

Other specific health concerns are outlined as follows:

B9f High voltage power lines create a "field effect" that can disrupt human physiology of the electrical systems of the body and also creates a physiological stress response. Stress physiology has been directly linked to human disease states and accelerated aging processes. Ill effects are thought to interfere with the transmission of calcium across the cell membrane, a flow that governs muscle contraction, egg fertilization, cell division and growth. EMF may also disturb a cell's ability to process hormones, enzymes and other biological signals that regulate normal cellular processes.

Neurological:

EMF are known to affect nerve impulses. Neurological effects: brain chemistry changes that can cause cognitive disturbances, brain fog, confusion, disorientation, irritability, vertigo, dizziness, seizures, memory issues, coordination, balance issues, tingling, numbness, hyperesthesia, increase incidence of Alzheimer's Disease, senile dementia, noise sensitivity, tinnitus, insomnia, headaches.

Insomnia has been noted to increase by 30- 50% near power lines.

Cardiac:

Dysrhythmias, cardiac pacemaker malfunction, ischemic heart disease, elevated blood pressure

Page 6 of 8

COMMENT(S)

B9 **Elements of Health (cont.)**

B9g

Reproductive:

California Project Report that 40% of all early-term spontaneous abortions may be attributable to EMF.

The incidence of miscarriages have shown a strong correlation with elevated exposure to EMF by G.M. Lee in January 2002 in Epidemiology. In a Study by Dr. DE- Ku Li, that even momentary exposure to EMF greater than 16mG leads to a 3 fold increase in spontaneous abortions and 6 fold increase in spontaneous abortions before the 10th week of pregnancy.

Within 25 meters of power lines, there was an excess of miscarriages 35 to 5 for those living greater than 25 meters away.

Immunological effects: dampened immunity, auto-immune disorders (such as lupus, rheumatoid arthritis)

Endocrine: diabetes Type II. As exposure increased, there was a linearly increase in type II Diabetes.

Lung conditions: irritable airway disease, asthma. As exposure increased, there was a linearly increase asthma.

Behavioral effects: potential for violence, depression, agitation, chronic fatigue, ADD, ADHD, suicide with studies noting an increase in depression 2 fold for those living close to high voltage power lines.

These health consequences can have a significant impact on the community in several different areas.
Examples:

Increased incidence of cancer and various other diseases.
Decreased quality of life as impacted by illness, symptoms, etc.
Increase in health care costs including health insurance rates.
Loss of property values due to increased awareness of health hazards of EMF regions.
Impact on worker productivity due to illness.

Page 7 of 8

RESPONSE(S)

B9g See response to Comment B9e.

COMMENT(S)

B9 **Elements of Health (cont.)**

B9h

Is the risk of these health hazards from these 500kV lines acceptable? They are not acceptable to us and therefore we request that the current proposed route of B2H power line is not suitable and that it will have an significant adverse impact on health of this community.

We hope that we have raised some important questions in your minds about the potential health hazards that could result from exposure to electromagnetic field emissions by B2H transmission line. We trust that you will give the health of individuals and the health of our community serious considerations.

Solutions:

1. **Select the No Action Alternative** which was not considered in the DEIS. The long-term impact of this extra high voltage high power lines will negatively affect the health of the community.
2. **If the 500kV transmission has to be built at all, place it on the Central Oregon Utility Corridor. Place in area with least human habitation exits.**
3. **If the route has to come through Baker County, then locate it on the proposed Virtue Flat route.** It needs to be away from interference with humans and our biofeedback technology.

Please consider our concerns in the spirit of health and well-being.

Respectively submitted,

Jill Schumacher, BD, DNM

Meredith McCord, BD, DNM

Page 8 of 8

RESPONSE(S)

B9h

This section has been revised for clarity. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP), for guidance and guidelines regarding EMF. EMF is discussed in greater detail in Section 3.2.18. As identified in design features of the Proposed Action (Table 2-7, Design Feature), the Applicant would continue to address public health and safety throughout the life of the B2H Project.

COMMENT(S)

RESPONSE(S)

B10 **Elk Song Ranch – March 18, 2015**

RECEIVED
MAR 18 2015
B.L.M. VALE DISTRICT

B2H Transmission Line Response Letter

Written by: Brad and June Allen
Owners of Elk Song Ranch
March 2015

COMMENT(S)

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

RECEIVED
MAR 18 2015
B.L.M. VALE DISTRICT

March 10, 2015

B2H Transmission Line Project
PO Box 655
Vale, OR 97918

Response Letter to DEIS Written by: Brad and June Allen - Owners of Elk Song Ranch

To Whom it May Concern:

My comments are directed toward segment 2- Blue Mountains in Union County - The Glass Hill Proposed Route and the Glass Hill Alternate. (See Attachment #1 - Map of the Segment being Discussed)

Both the proposed and the alternate routes through this segment cross the same timbered landscape with the exact same impacts. The DEIS findings were identical for each route. It was like comparing an orange to an orange. Both routes were exactly the same. When choosing an alternate route, it would have been logical to compare a route with possible different impacts, hoping to find a route with the least impact.

I would like to point out impacts addressed in the DEIS and also other related impacts.

B10a

Threatened/Endangered Fish: Confederated Tribes of the Umatilla Indian Reservation has studied the streams of these routes extensively. Elk Song Ranch alone has 13 miles of fish bearing streams. The addition of new roads within the Rock Creek drainage is a big concern for potential negative impacts from concentrated or increased sediment supply to the stream system, particularly along slopes and ridges of Rock Creek. Sediment quality has been identified as one of the limiting factors affecting the recovery of the listed species. The proposed route parallels Rock Creek for several miles. Seeps and springs on "Cowboy Ridge" contribute a significant amount of water to Rock Creek. Because of data collected by the Tribe, great concern about fish listed as endangered species has been identified. (Find Attachment #2 - Letter from the "Confederated Tribes of the Umatilla Indian Reservation)

RESPONSE(S)

B10a Pertinent information from CTUIR has been incorporated into the Final EIS. The Applicant has committed to updated design features and selective mitigation measures designed to minimize anticipated potential B2H Project impacts from new access roads and sediment transport to streams from upland locations. B2H Project design features and selective mitigation measures that would minimize impacts on fish resources include spanning of riparian communities and water courses, using existing access roads, and selective removal of vegetation. Refer to Section 3.2.5 of the Final EIS for analysis of impacts.

COMMENT(S)

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

B10b

Big Game Winter Range DEIS 3-292 addresses the concern for big game winter range disturbance, showing long term moderate impacts to big game, but I was unable to find where DEIS had addressed concerns for damage to the spring, summer and fall range. These routes are used heavily by elk year round.

B10c

Clearing of Forests DEIS 3-288 discussed impacts due to forest and woodlands being cleared. The DEIS pointed out high impacts to endangered species such as Northern Goshawk and the American Tree Toed Woodpecker. This section mentioned forest and woodlands would be slow to regenerate. I believe this impact was understated because these forests would never be allowed to regenerate under the 250 foot easement.

B10d

The Damage Caused by Roads: Roads create habitat barriers for wildlife. The Pacific Northwest Research Station studied the impact of roads to elk extensively. The Starkey project conducting this study was just a few miles from these routes. After several years of study, it was determined that elk were strongly influenced by open roads. When elk were unable to avoid roads and trails, subsequent studies show that animals increased their movement rates, which can increase energy expenditures. Higher movement rates could reduce the animals fat reserves and undermine general animal condition and winter survival. (See Attachment #3 - Article titled "Pacific Northwest Research Station" pages 4-5)

B10e

Elk Breeding and Calving: The DEIS failed to address impacts to breeding and calving of elk along these routes. Game biologist, Mike McAllister, adamantly states that "Cowboy Ridge" (5 miles of the proposed route) is some of the best elk habitat in Northern America. He calls it the "crown jewel" of the area. Hundreds of elk breed and calve on cowboy ridge. Mr. McAllister calls the placement of a transmission line on Cowboy Ridge a crime to nature. He also disputes any claim that the power line would not adversely impact elk. Last summer 97 bulls were counted on the ridge at one time. YouTube videos are available showing elk numbers on this ridge. Mr. McAllister also believes that many mature bulls leave Elk Song Ranch, enhancing sportsman opportunities for the entire wildlife management area.

Theodore Roosevelt Conservation Partnership (TRCP) did a study on three large ranches in the Western United States back in March 2011. Elk Song

RESPONSE(S)

B10b

The big game analysis has been revised for the Final EIS to include additional information on direct and indirect effects of the B2H Project, including information on other big game habitats in addition to winter ranges.

B10c

The Applicant has committed to design features and site-specific mitigation measures to minimize impacts to sensitive wildlife, including preconstruction surveys, seasonal and spatial restrictions for sensitive periods and habitats, minimization of timber and other vegetation clearing, spanning/avoiding sensitive features (e.g., water bodies), and a Plan of Development that includes a Biological Resources Conservation Plan. Refer to Section 3.2.4.3 in the Final EIS.

B10d

Comment noted. Please see Section 3.2.4 for information regarding potential impacts to Elk.

The analysis for elk has been revised for the Final EIS to include additional information on direct and indirect effects of the B2H Project, including information on impacts from roads.

B10e

Comment noted. The Applicant has committed to design features and site-specific selective mitigation measures designed to minimize anticipated B2H Project effects to elk, such as seasonal and spatial restrictions, creation of a Plan of Development that includes a Biological Resources Conservation Plan, and limiting new or improved accessibility to sensitive habitat.

COMMENT(S)

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

B10e

being one of the ranches studied. TRCP publication states conservation contributions made by Elk Song Ranch, including facts such as 1,000 elk calves being born on the ranch annually and the ranch wintering 2,000-3,000 elk, just to name a few. (See Attachment #4 - TRCP Publication - page 14)

B10f

Noxious Weeds - A BLM representative noted, after watching video of Elk Song Ranch that there were very few weeds, most of the area on these routes are virtually weed free. Many noxious weed sources are traced to roads. The construction of the transmission line, and associated roads will highly increase the risk of noxious weeds. Vehicle traffic will be ongoing and be a major contributor to noxious weeds being introduced to the area. Wildlife and other animals will continue to spread noxious weeds after being introduced. (See Attachment #5 - Noxious & Invasive Weeds of Johnson County) Cowboy Ridge drains large amounts of water. There are several seeps and springs. Moving water will further spread noxious weeds to riparian areas along Rock Creek.

B10g

Eagles Nest - Osprey Nest: There is at least one Eagle nest and one Osprey nest in close proximity to the proposed route.

B10h

Visual Impacts: DEIS 3-611 states from Elk Song Ranch stationary platform (4-55) would be predominantly skylined resulting in a high visibility condition impact. This view is at the main entrance to the ranch. Also, all views looking from the southwest onto Elk Song would highlight the view of the transmission line. Consequently, visual impact would be huge.

B10i

Economic Impact to Elk Song Ranch: The ranch encompasses 7,480 acres of undeveloped land with unspoiled vistas. The elk habitat is some of the best in Western United States. It has been managed the past 20 years in favor of elk. The ranch has a reputation in the area as being superb. Dauner Boot Co. shot a 2014 archery hunting commercial on Elk song. The company stated that after searching the entire Western United States, Elk Song was the ranch they most desired. (See Attachment #6 -Letter from Danner Boot Co.) Portland Trail Blazer basketball star, Chris Kaman, recently inquired about hunting on the ranch. The monetary value in the ranch is based mostly on its appeal to hunting and outdoor recreation. Placing a 500kv line through the middle of the ranch ruins the outdoor scenic hunting experience that few people ever experience. IPC gave me an appraiser's contact information to discuss how much the line would de-value the ranch. This Pendleton based,

RESPONSE(S)

B10f

The analysis of weed invasion has been expanded to include an identification of areas with low weed densities and the increased risk of weed invasion to these areas from access roads. For the expanded noxious weeds analysis, refer to Sections 3.2.3.5 and 3.2.3.6.

The Applicant has committed to several measures designed to mitigate effects from noxious weeds, among them the creation of a Noxious Weed Management Plan and a Reclamation, Revegetation, and Monitoring Plan, which will be included in the Plan of Development. These plans detail the methods used to conduct preconstruction weed surveys, areas requiring ongoing weed control activities both before and after B2H Project construction, and post-construction weed monitoring. Preconstruction surveys of areas of existing weed infestations would be conducted for the selected route to identify appropriate weed control measures, which could include installation of gates (upon landowner approval) as well as other measures to reduce vehicular transmission of invasive weeds. Noxious weed populations will be monitored and controlled for 3 years following B2H Project construction, with possible weed control efforts continuing depending on monitoring results. All required weed control activities would be documented in the Plan of Development, which must be approved by BLM and cooperating agencies prior to issuance of the Record of Decision and right-of-way grant. The Plan of Development would be a condition of the Record of Decision and a stipulation of the right-of-way grant.

B10g

Comment noted. The Applicant has committed to preconstruction surveys to identify locations of raptor nests and seasonal and spatial restrictions will be implemented.

B10h

Comment noted. Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment.

B10i

The Applicant would negotiate with affected land owners to ensure that property owners are appropriately compensated if any private property interests are impaired by the final location.

The analysis has been expanded to include alternative route variations with careful consideration of private lands. The impact on property rights will be carefully considered by the Applicant during micro-siting to ensure adverse impacts to private property interests are minimized by the final placement and design. Landowners would be appropriately compensated for any unavoidable damage.

COMMENT(S)

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

B10i well respected appraiser replied that having appraised Elk Song Ranch before, knowing the ranch well, believed it would **devalue the ranch by 3.5 million.**

B10j After many hours of studying the DEIS and other findings, it is apparent that following the proposed or alternate routes are not acceptable. There are far too many environmental impacts. **There was no "true" alternate route presented. It appears that Idaho Power Company may have manipulated the scoping process.** When routes were offered, IPC used findings by Tetra Tech, a company hired by them to discount viable options. For example, when the existing 230 corridor was suggested, facts were not properly analyzed.

B10k 1. IPC would not acknowledge the fact that the existing 230 right-of-way is already exposed to environmental impacts. An additional line in this path would **not** create a whole set of new impacts, such as they implied.

2. IPC claimed the existing 230 right-of-way couldn't be used because of Ladd Marsh Wildlife Management Area, even before inquiring of ODFW. This claim was not true. ODFW is not opposed to another line in the existing 230 right-of-way.

3. IPC representatives have told myself and others repeatedly that they need a 1500 foot separation from the existing 230 line. During a meeting with IPC officials on March 10, 2015, after asking them why a 500 foot separation was adequate in the Baker Valley, **I was finally told that a 250 foot separation was enough.** So the separation concern has been overstated repeatedly in the past.

Obviously, IPC did not want the existing 230 line to become a route to be analyzed by the BLM. Possibly because it is longer and could be more expensive.

B10l **Reasons Why the 230 Corridor Should be Used**

DEIS 3-390-line 7: highlights the necessity of using existing utility corridors per county codes and/or ordinances. Malheur, Umatilla and Union counties

RESPONSE(S)

B10j Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/ options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

B10k See response to Comment B10j.

B10l Analysis has been expanded to include alternative route variations with careful consideration for colocation with existing facilities (utilities and transportation). See Section 2.1.1.3 (Recommended Route-Variation Options) for further detail.

COMMENT(S)

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

B10l

encourage the development of transmission lines on existing transmission line right-of-ways wherever possible. There is an existing corridor that should be used.

DEIS 2-57: States that the Glass Hill alternative was developed to address concerns about the proposed actions proximity to Ladd Marsh Wildlife Management Area and concerns about the visibility of the line from LaGrande. Union Co. representatives may want the line out of sight, however, goal 4&5 resource plans prioritizes agriculture, timber and wildlife. Goal 5 does not offer visual protection to LaGrande city view and especially at the expense of other resources.

B10m

Goal 4: Forest Lands - OAR 660-015-0000(4) States That:

1. Right-of-ways should be designed so as not to preclude forest growth whenever possible.
2. Maximum Utilization of utility right-of-way should be required before permitting new ones.
(See Attachment #7 - Goal 4: Forest Lands - page 2)

DEIS 3-542-18: States that private lands are not subject to visual resource management standards. Private lands are subject to land-use regulations of the respective local government within which they are located. Local governments do not classify private lands according to their visual resource attributes and do not prescribe levels of visual quality that must be maintained in specific locations. There are no visual protections that allow Union County representatives to prioritize it's view over impacts to timber, fish and wildlife.

DEIS 2-72 The BLM chose the proposed route (over the alternate) as having the least impacts because of **the closer alignment of the proposed action to an existing transmission line for 3 of the 7.5 miles and avoidance of effects on a relatively undisturbed landscape.**

The BLM recognizes the need to follow existing corridors in order to avoid effects on undisturbed landscape. It is my opinion that if the BLM had been given the option to follow the existing line the entire length, it would have been the agency's choice for a least impact route.

RESPONSE(S)

B10m

Analysis has been expanded to include alternative route variations with careful consideration of timber resources. See Section 2.1.1.3 (Recommended Route-Variation Options) for further detail. Analysis in Chapter 3 has been expanded to include evaluation of existing timber resources and potential effects from the proposed action. See Section 3.2.6.

Siting of the B2H Project would be in compliance with applicable federal, state, and local land use regulations and guidance.

COMMENT(S)

RESPONSE(S)

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

The best route with the least impacts is to follow the existing 230 right-of-way because: (See Attachment #8 - Map of Proposal)

1. Does not impact big game winter range in addition to the area already impacted in the existing right-of-way

2. Fewer Roads which means: less wildlife fragmentation and less spread of noxious weeds, and less risk for forest fire.

3. Less Forest clearing

4. No additional area impacting breeding and calving of elk.

5. Eliminates impacts to threatened/endangered fish from Rock Creek, Little Rock Creek and Graves Creek.

6. Complies with goal 4 resource plan, which requires maximum utilization of utility rights-of-ways before permitting new ones.

In summary, even though IPC's desire is to follow the proposes route, the environmental impacts are too high! There is extensive data to support the necessity of following existing utility right-of-ways.

It is our recommendation that the BLM seriously consider following the existing 230 transmission line, and eliminate the current proposed and alternate routes through Glass Hill's predominately forested lands.

As members of the Glass Hill Coalition we support all it's efforts and standings related to the DEIS response presented by Dan Turley.

Thank You for considering this serious matter,

Brad Allen June Allen

Brad and June Allen, Owners of Elk Song Ranch

COMMENT(S)

RESPONSE(S)

B10 | **Elk Song Ranch – March 18, 2015 (cont.)**

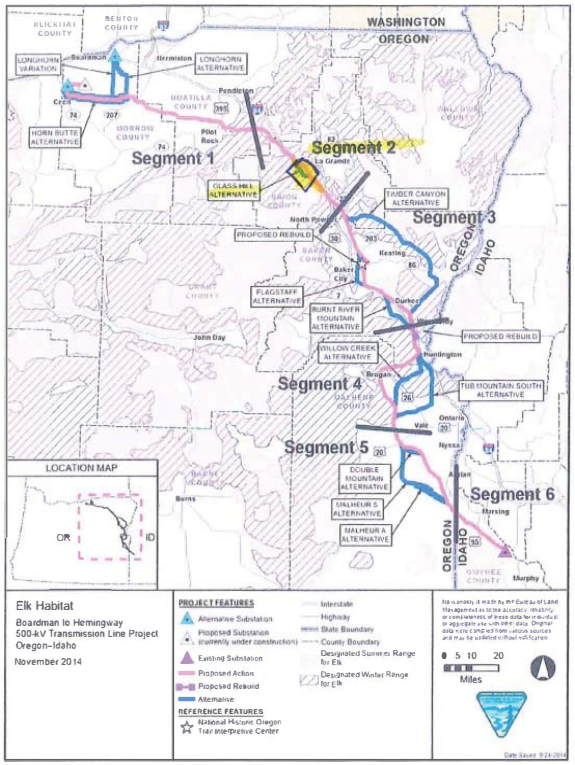

Figure 3-18. Elk Habitat

ATTACHMENT

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

Confederated Tribes *of the*
Umatilla Indian Reservation

DNR Fish & Wildlife Programs

46411 Timíne Way
Pendleton, OR 97801

www.ctuir.org email: info@ctuir.org
Phone 541-276-3447

3/11/2015

Dear Mr. Allen,

Following our recent March 2015 conversations about Endangered Species Act listed fish use of the Rock Creek Sub-Watershed I would like to give you an update on the recent fish surveys/sampling conducted by the Confederated Tribes of the Umatilla Indian Reservation (CTUIR).

- **Steelhead Spawning:** CTUIR started steelhead spawning surveys within the sub-watershed in 2011. Each year during the spawning season (March to June) approximately 12.1 miles of streams have been surveyed. These streams include Rock Creek (lower 4.8 mile), Graves Creek (lower 4.2 miles), Sheep Creek (lower 1.2 miles), Little Rock Creek (lower ½ mile), and Little Graves Creek (lower 1.4 miles).
  - The number of redds found each year range between 7 and 14 with an average of 10 per year for all stream miles combined.
  - Typical peak spawning occurs in April and May, However, in 2015 CTUIR observed 12 redds on March 10 within the lower 4.8 miles of Rock Creek.
  - On March 11th 2015 CTUIR biologists observed 3 steelhead redds on Rock Creek within the Elk Song Ranch property boundary. Juvenile *O.mykiss* were also observed on the ranch in Little Rock Creek.
- **Juvenile Steelhead/*O.mykiss* presence:**
  - **Snorkel surveys:** CTUIR conducted snorkel surveys on Rock Creek in 2011, 2012, and 2014 with estimated average densities of 1 fish per m^2 of pool habitat.
  - **Fish Salvage as part of restoration actions:** In summer 2014 CTUIR conducted salvage operations on Rock Creek to remove all fish species (including ESA listed fish) from areas of stream bed/bank disturbance during placement of large wood habitat. Methods used were electro-fishing and sein nets, with 24 sites salvaged. Results were:
    - 3,664 fish salvaged of which 2,185 were ESA listed fish (steelhead/*O.mykiss*).
    - ESA listed fish made up 59.6% of all fish captured.
    - Densities of captured ESA fish were 2.67 fish/m^2 of pool habitat (nearly 3 times the density of fish salvaged in Catherine Creek in the same year).
    - Snorkel surveys underestimated fish densities by approximately 60%
- **Juvenile Chinook Salmon presence:**
  - CTUIR recorded 30 juvenile Chinook in 2011 during snorkel surveys.

Limiting factors affecting the recovery of ESA fish species within this sub-watershed have been identified by the Grande Ronde Subbasin Plan (2009), Oregon Draft Recovery Plan for Spring/Summer Chinook and Steelhead Populations (2010), and Bonneville Power Administration's (BPA) Atlas process (2014) as:

- 1.1 Habitat Quantity: Anthropogenic Barrier
- 4.1 Riparian Condition: Riparian Condition
- 4.2 Riparian Condition: LWD Recruitment (STS)
- 6.1 Channel Structure and Form: Bed and Channel Form
- 6.2 Channel Structure and Form: Instream Structural Complexity
- 7.2 Sediment Condition: Increased Sediment Quantity
- 8.1 Water Quality: Temperature
- 9.2 Water Quantity: Decreased Water Quantity

ATTACHMENT

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

Confederated Tribes of the
Umatilla Indian Reservation

DNR Fish & Wildlife Programs

46411 Timíne Way
Pendleton, OR 97801

www.ctuir.org email: info@ctuir.org
Phone 541-276-3447

The watershed is also ranked second highest priority for conservation actions within the Upper Grande Ronde by the Natural Resource Conservation Service (NRCS) 2013 Conservation Implementation Strategy.

As we discussed in early March water run-off from the ridges and slopes does naturally contribute water and sediment to the stream with these slopes typically remaining saturated for extended periods through the winter and spring into early summer. However, the addition of new roads within the Rock Creek drainage would be a concern for the potential negative impacts from concentrated or increased sediment supply to the stream system, particularly along the slopes and ridges of Rock Creek (as sediment quantity has been identified as one of the limiting factors affecting the recovery of listed species).

We look forward to working with you on restoration projects along the 13 miles of fish bearing streams on your ranch. These species are not only listed as threatened and/or endangered, but are also historically and culturally significant to the Tribe.

Leslie M Naylor

CTUIR Dept Fish and Wildlife
Assistant Fish Habitat Biologist
Grande Ronde Fish Habitat Program
Ag Service Center
10507 North McAlister Rd
Island City, OR 97850
Cell: 1-541-215-2245
Office: 1-541-429-7942

ATTACHMENT

B10	Elk Song Ranch – March 18, 2015 (cont.)

Pacific Northwest Research Station

Science Update

ELK, DEER, AND CATTLE: THE STARKEY PROJECT

Frank Vanni

IN SUMMARY

Definitive results from the Starkey Project's first decade (1989–99) have given managers defensible options for managing roads, timber production, and range allotments in relation to elk, deer, and cattle. Study results have prompted changes in policies, management standards and guidelines, hunting regulations, and timber sale planning throughout western North America.

In the 1970s and 1980s, wildlife managers, hunters, and forest managers had intense debates about how elk, mule deer, and cattle should be managed on public lands. In response, scientists from the Pacific Northwest (PNW) Research Station and the Oregon Department of Fish and Wildlife (ODFW), in collaboration with over 40 partners, initiated the Starkey Project in the Blue Mountains of northeastern Oregon. Starkey is a controlled, landscape-scale study at the Starkey Experimental Forest and Range and the primary field location for research on mule deer, elk, and cattle in managed ecosystems of the Pacific Northwest.

Four major themes were identified for the Starkey Project's first decade of research: (1) roads and traffic, (2) timber production and thermal cover, (3) competition with cattle, and (4) breeding efficiency of male elk. The result of the research was a set of compelling findings about elk, deer, and cattle responses to a variety of forest and rangeland activities at scales compatible with management. The Starkey findings are described inside.

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ATTACHMENT

B10 | **Elk Song Ranch – March 18, 2015 (cont.)**

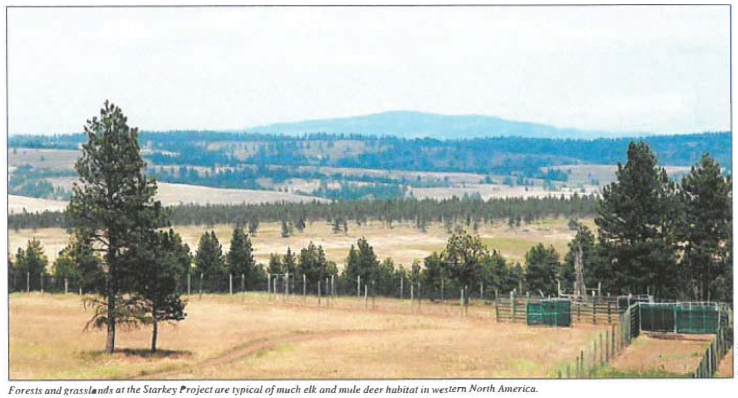
What is the science base for how elk, mule deer, and cattle are managed on public lands?

Elk and mule deer are highly valued for hunting and viewing in western North America. In the 1970s and 1980s, wildlife managers, hunters, and forest managers were involved in intense debates about best management practices for elk and mule deer on public lands. Timber harvest, an expanding network of forest roads, and recreational traffic on these roads were thought to affect elk and deer, but people argued about exactly what those effects were, with little definitive experimental data to back up opinions. Hunters, ranchers, and wildlife managers had long disagreed about whether or not cattle, deer, and elk competed for available forage on western rangelands. Finally, elk herd productivity, as affected by elk population management practices, was recognized as a major issue. State wildlife agencies regulated hunting, but agency staff did not have definitive science behind their regulations affecting the number of mature bull elk maintained for herd productivity and elk population goals.

In response to these debates, the Starkey Project was initiated in northeastern Oregon at the Starkey Experimental Forest and Range. Scientists designed and carried out rigorous studies at a landscape scale to evaluate deer and elk responses to dominant land uses on public lands. Located in the Blue Mountains of northeastern Oregon (see map), the Starkey Experimental Forest and Range was designated as a research area in 1940, and many studies had already been done there. Starkey has open

Key Findings

- Elk avoid roads open to motorized traffic, and their avoidance increases as the rate of traffic increases. Mule deer avoid elk and thus can be displaced into areas least used by elk, such as areas near roads with the most traffic.
- Elk avoid cattle, and mule deer avoid elk. Elk can select habitats without cattle when cattle are rotated through livestock pastures, but mule deer may not have as many choices for avoiding elk. The diets of cattle and elk differ substantially during early summer, but become increasingly similar during late summer, with more potential for exploitative competition.
- Intensive timber harvest can benefit cattle and elk from the increased forage available after timber harvest. However, if roads are left open, elk are more vulnerable to harvest by hunters. Access management and maintenance of security cover can mitigate this effect. Elk do not benefit from homogeneous stands of thermal cover; a mix of open- and closed-canopy habitats is optimal for elk.
- Older male elk are more efficient breeders, resulting in earlier, more synchronous calf births the next spring, which may benefit calf survival.



Frank Venutti

Forests and grasslands at the Starkey Project are typical of much elk and mule deer habitat in western North America.

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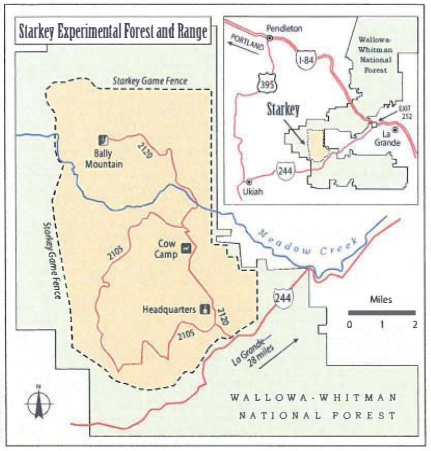
B10 **Elk Song Ranch – March 18, 2015 (cont.)**



The Starkey Project is a one-of-a-kind research facility, located in the Blue Mountains of northeastern Oregon. Starkey is the primary field location for scientific study of the effects of deer, elk, and cattle in managed ecosystems.

Purpose of PNW Science Update

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stands of ponderosa pine along with mixed-conifer stands of varying densities, intermingled with natural grassland openings.

The original champion of the Starkey Project was Jack Ward Thomas, who led the project from 1982–93. He went on to be Forest Service Chief from 1993 to 1996 and Boone and Crockett Professor at the University of Montana from 1996 through 2005. Larry Bryant, PNW Research Station, and Donavin Leckenby, ODFW, worked closely and diligently with Thomas to turn the vision of a controlled, landscape-scale study on wild and domestic ungulates (hoofed mammals) into a reality.

"The research done at Starkey was, and still is, designed to answer management questions," explains Marty Vavra, team leader and supervisory rangeland scientist located at PNW Research Station's La Grande Forestry and Range Sciences Laboratory. "The Starkey research is relevant West-wide for the management of elk, mule deer, cattle, forests, and rangelands."

A controlled study meant building an enclosure that would hold wild elk, animals that can easily jump high fences and break through ordinary fences, and a landscape-scale study meant enclosing a large area. The Starkey Project includes 25,000 acres (almost 40 square miles) enclosed by a game-proof fence. "The big fence" was built in 1987 and consists of 8-foot-high woven wire. More game-proof fencing further divides the project area into four study areas: the main study area (19,180 acres), Campbell Flat pasture (1,537 acres), the northeast study area (3,590 acres) subdivided into two pastures, and the winter feeding and handling area (655 acres). With the completion of the radio-telemetry system in 1989, the project became fully operational.

The big fence encloses about 500 elk and 250 mule deer year round, and 550 cow-calf livestock pairs during summer. The enclosure is larger than the summer home range of most deer and elk, with animals living under conditions similar to wild, free-ranging herds. Large predators, including cougar, black bear, and coyote, are able to go either over or under the big fence and are part of the ecosystem, just as they would be outside Starkey. Elk and deer at Starkey are wild, hunted animals that are handled briefly in winter feeding areas but are not acclimated to humans.

"All studies are spring, summer, and fall range investigations," explains Mike Wisdom, research wildlife biologist with the Starkey Project, also at the La Grande Laboratory. During winter, most elk move to the winter feeding and handling area. Most deer spend winter in the forest and are fed hay when they move into the winter handling area. The winter feeding evens out effects of winter weather on animal body condition, thus reducing any confounding effects that variation in winter severity may cause on elk or deer nutritional condition.

Movements of over 150 elk, deer, and cattle are monitored annually with radio collars. The telemetry system used for the

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

project's first 10 years, a LORAN-C system, is being phased out, as replacement parts are impossible to obtain. The new system, installed in 2005 and expected to be fully operational in 2006, is based on a global positioning system (GPS). The GPS provides animal locations as frequently as every few seconds with 1- to 2-yard accuracy, and it runs continuously for 24 hours a day, 9 months each year, with little maintenance. It allows real-time monitoring of the animals as well as human activities in relation to the animals. The telemetry systems have given scientists the largest, most accurate set of animal locations ever collected on ungulates in the world.

Hunting also is a key tool used in the research. Controlled, public hunts of deer and elk are administered by ODFW. Hunting puts the deer and elk under the same types of pressures that exist outside Starkey and helps control population levels in line with goals to sustain habitats and animal numbers.

Four major themes were identified for the Starkey Project's first decade of research: (1) roads and traffic, (2) timber production and thermal cover, (3) competition with cattle, and (4) breeding efficiency of male elk. Definitive results from the Starkey Project's first decade (1989–99) have given managers defensible options for managing roads, timber management, and range allotments, in relation to ungulates. These findings are commonly used by state, private, and federal resource managers across western North America.

How does traffic on forest roads affect elk, deer, and cattle?

Thousands of miles of forest roads were built on public lands from the 1960s through the 1980s for timber harvest, but the effects on elk were uncertain and highly debated. People had long noticed that elk avoided roads used by cars and trucks in managed forests where elk are hunted, but a widely used elk-road density model had not been thoroughly tested.

To test the road density model, scientists started the road management study in Starkey's main study area in 1989. Over 70 traffic counters were installed throughout the area, and traffic was monitored from May through December every year. The study area had about 2.5 miles of open road per square mile, with open roads spanning many environmental conditions. Other roads in the study area were closed.

When elk were unable to avoid roads and trails, subsequent studies showed that animals increased their movement rates, which can increase energy expenditures.

After several years, the result was a set of compelling findings about deer and elk responses to roads and traffic. Scientists found that cattle showed no particular reaction to open roads, neither avoiding them nor choosing to stay near them.

Elk, however, were strongly influenced by open roads. "Female elk consistently selected areas away from open roads in both spring and summer," Wisdom says. Elk response was affected by traffic rates, amount of forest cover near roads, and the type of road (which related to traffic rates). Once the elk were farther away from roads, they were more influenced by other factors such as conditions affecting forage.

The controlled study area allowed scientists to keep elk in areas with higher road densities. When elk were unable to avoid roads and trails, subsequent studies showed that animals

Leslie Sawyer

The new global positioning system technology (elk on right) offers greater accuracy and more options for sampling designs than the original LORAN-C system (elk on left) now being phased out.

Frank Vanni

Automatic traffic counters throughout the main study area tallied how many vehicles passed and when. Traffic data could be correlated with telemetry data, showing how animals responded to the traffic.

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

increased their movement rates, which can increase energy expenditures. Higher movement rates could thus reduce the animals' fat reserves and undermine general animal condition and winter survival.

Mule deer behavior seemed to be affected more by elk than by roads. "Mule deer tended to avoid elk," Vavra explains, "and so the deer often used areas near roads." That is, mule deer are more likely to use areas least used by elk, which means deer end up in areas near roads with the most traffic.

These results support management of road access as part of elk management. Study results were incorporated into a model that could be used by managers; the model uses distance bands 328 feet wide as a basis for calculating disturbance to elk from roads. The research had shown that distance bands were more accurate for estimating disturbance to elk than road density alone.

State wildlife and federal land managers throughout western North America use these models to manage road access on public lands, and the findings were used in developing the national Forest Service road management policy. The Starkey studies of roads and elk contributed to the emerging discipline of road ecology, which is the study of the effects of roads on wildlife, plants, and watersheds.

How does intensive forest management affect elk, deer, and cattle?

In the last half of the 20th century, timber harvest in federal forests increased, affecting much elk habitat in the Western United States, but managers had limited knowledge about the specific effects. Part of the controversy focused on effects of timber harvest activities and resultant changes in forage and cover conditions, versus effects from increased disturbance of people and traffic following establishment of new roads needed for logging.

Starkey was the ideal place to carry out controlled studies that isolated these factors. Cattle and elk responses to intensive timber management were studied in Starkey's 3,590-acre

Courtesy Starkey Project

Although elk avoided active logging operations, they were attracted to harvest units a year or two later when new grasses and forage sprouted.

D. Johnston

Cattle used roads for travel routes, and they preferred grasses to other forage plants.

northeast study area. Telemetry data were collected in 1989–91 before timber harvest, to establish a baseline, and collection continued during logging (1992) and throughout the postlogging site preparation, tree planting, and tree stocking surveys from 1993 through 1996. Grand fir and Douglas-fir were harvested from 1,207 acres of the 3,590-acre study area, or about 50 percent of the area, but in a patchwork pattern of harvest units ranging from 3 to 55 acres each. Units were dispersed so no large areas of escape cover remained, and dense cover was deliberately not maintained. About 24 miles of new roads were built, in addition to 10 miles of existing roads. The area was closed to public access except during hunting seasons, and hunters were allowed entry for hunting purposes only (no camps allowed).

Timber harvest and road traffic had little measurable effect on cattle. Elk, however, avoided the short-term disturbance of the logging activity itself, but elk did not avoid the harvest units or the log-hauling roads during and after timber harvest. In general, the elk population became more dispersed during and after the timber harvest, suggesting that the elk were moving farther over larger areas to meet their needs.

After the timber harvest and site preparation activities were finished, cattle used the timber harvest units as new grazing areas, and domestic cows and calves in the study area had higher weight gains than cows and calves in the main study area. Annual weight gains for elk after timber harvest were similar to annual weight gains for elk before harvest. Average annual weight gain varied considerably from one year to the next for cattle and elk in both study areas, but these variations correlated most closely with summer rain or drought, and the weather's effects on forage growth and quality.

Although elk and cattle productivity was not negatively affected by timber harvest, the vulnerability of elk to hunting increased substantially. The open landscape after logging made elk more visible, and the new roads gave hunters better access. Hunter success improved significantly during and after timber harvest, even though elk performance (weight gain, general body condition) had not changed.

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

Timber harvest may have the strongest and most enduring effects on elk vulnerability to hunting.

"Timber harvest may have the strongest and most enduring effects on elk vulnerability to hunting," Wisdom comments. To reduce elk vulnerability, managers have several options, including timber sale designs that include security areas for elk in the landscape design and restricted hunter access until hiding cover grows back. Hiding cover is related to but different from the concept of thermal cover, another issue that Starkey scientists studied.

Other studies have shown that the flush of increased forage after timber harvest may last 10 years or longer, but forage will likely decline as young trees shade the ground again. Thus, consideration of findings from these studies, combined with results from the timber management study, suggests that an optimal timber harvest schedule for elk is one that maintains a variety of foraging conditions in a watershed over time. Importantly, the logging schedule would be combined with effective management of elk security and human access to meet goals for elk hunting and animal numbers.

Do elk, deer, and cattle use habitat differently?

In the 1980s forest managers had two working hypotheses related to elk and deer management. The first was the thermal cover hypothesis, which said that elk and deer needed dense forest cover to stay warm in cold, windy winter weather and to stay cool in summer heat. The second was the animal equivalency hypothesis, which assumed that mule deer, elk, cattle, and sheep competed directly for forage; under this hypothesis, animal forage amounts and equivalency formulas based on species and body weight were being used in grazing management plans. Neither hypothesis had been rigorously tested, and the shortage of hard data showed how little was known about elk and deer in relation to management of cover and livestock grazing.

People knew that elk sought dense forest cover, and the thermal cover hypothesis attempted to answer why the elk used dense forests. The definitive study on elk and thermal cover was done at Kamela, Oregon, about 30 miles northeast of Starkey, and was conducted by John Cook, National Council for Air and Stream Improvement, in collaboration with the Starkey Project. The nutritional condition of elk was monitored under four treatments: dense thermal cover, moderately dense thermal cover, no cover, and a combination of no cover and thermal cover. This study was conducted in very controlled conditions relying on bottle-raised elk maintained in pens, so the effects of cover could be isolated from other factors.

Results showed no positive benefits from thermal cover—in fact, high levels of cover had a negative effect. Instead, a mix of open- and closed-canopy habitats resulted in superior animal performance compared to homogeneous stands of thermal cover. Other studies suggest that elk use of dense cover is related more to protection and security needs, especially during hunting seasons. The findings helped resolve contentious litigation over thermal cover standards on national forests. Management direction for thermal cover has been changed in many places.

The widely used animal equivalency formulas were based on the second hypothesis about forage competition. Scientists realized that the formulas could be correct only if the different species were in the same place at the same time, eating the same plants, an assumption that had never been rigorously tested.

Elk, mule deer, and domestic cattle have different foraging ecologies. The three species select and use habitats differently, and they strongly partition their use of habitats.

The long-term animal unit equivalency study, led by Bruce Johnson and other ODFW staff, was conducted in Starkey's main study area. Over a number of years, scientists evaluated distributions, forage selection patterns, and interactions of elk, deer, and cattle under various cattle rotations. Again, new findings emerged with significant implications for management.

Elk, mule deer, and domestic cattle have different foraging ecologies. The three species select and use habitats differently, and they strongly partition their use of habitats, particularly by elevation, slope steepness, and aspect. Cattle are habitat generalists, and elk avoid areas where cattle are concentrated.

"Elk just don't want to hang out with cows," Vavra remarks, "and mule deer are intimidated by elk." Elk use low elevations if no cattle are there, but move to higher elevations when cattle are moved on to low-elevation range, showing that cattle can displace elk.

The three species also have different forage preferences, each species with a distinctive dietary niche that varies by season. "Diets of cattle, mule deer, and elk are very different during early summer," Wisdom comments. "Cattle diets have more grasses, deer diets have more shrubs and forbs, and elk diets are in between those of cattle and deer." The diets of the three ungulates became increasingly similar during late summer, when forage biomass and quality declined with summer drought, suggesting increased potential for competition in late summer.

Scientists used the results to develop a new forage allocation model for use in allotment planning. Rangeland managers can use the model to evaluate tradeoffs and benefits of different grazing management scenarios on summer ranges shared by cattle, mule deer, and elk.

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B10 | **Elk Song Ranch – March 18, 2015 (cont.)**

G. Zuhm

Elk avoided cattle, and mule deer avoided elk, leaving the deer with fewer choices for grazing areas.

Does the loss of older bull elk affect elk reproduction?

Hunters like to take home bull elk with large, branched antlers, which are the older males. Before the Starkey Project, most state hunting regulations allowed unrestricted kill of bulls, and with hunter preferences for branched-antler bulls, most male elk were harvested before they became fully mature. In general, most bulls present during the fall breeding period were less than 2 years old and often were yearling males with spike antlers. Wildlife managers were concerned that healthy, older bulls, which tend to dominate elk herds, were being removed prematurely from the herds, with negative effects on herd structure and elk reproduction. Restrictions on the number of mature bulls taken in hunting season could be unpopular with hunters, and state agencies needed rigorous data before changing their regulations, if they were to have hunter support and cooperation.

The research on breeding bulls, led by ODFW, was conducted in Starkey's main study area. From 1989 to 1993, breeding male elk were allowed to increase in age, beginning as 1.5-year-old (yearling) bulls in 1989. During each of these 5 years, this single cohort of male elk functioned as the only breeding bulls in the study population. The experiment was repeated again from 1995 to 1999.

As the bulls grew older, conception dates in the female elk became progressively earlier and synchronous (in the same time period) during the fall rut. Breeding by yearling (1.5-year-old) bulls resulted in the latest dates of conception and

John Kie

Older bull elk succeeded in breeding female elk earlier in the fall rut, leading to earlier elk calf births and better calf survival in the spring.

Frank Vanni

Older, branched bulls are prized by hunters, but play an important role in elk herd productivity. Starkey research influenced state game regulations on bull elk harvest in Western States.

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

most variation in conception dates; breeding by mature (5.5-year-old) bulls resulted in the earliest dates of conception. As conception dates became earlier, the elk calves were born earlier each spring, giving individual calves more time to gain weight before their first winter. Calves were born in a more compressed time period, which may reduce their susceptibility to predation during early life.

After the breeding bull study showed that older bull elk are more efficient breeders, with survival benefits for elk calves, many Western States and provinces throughout western North America modified their hunting regulations to protect older male elk from hunters. The protection of older bulls is now one of several management strategies for improving the survival of elk calves.

Partnerships

Most major ecological research projects are collaborations among several partners, but the Starkey Project has more partners than most. Starkey's expensive infrastructure—the big fence, radio-telemetry system, winter handling facilities—and the requirements for maintenance, data management, and animal handling—rely on multiple sources of funding.

The many partnerships also contribute to strong ownership in the results. Agencies that are involved have a better understanding of the validity of the research and are more likely to use the findings.

The Starkey Project is conducted jointly by the USDA Forest Service Pacific Northwest (PNW) Research Station and the Oregon Department of Fish and Wildlife (ODFW). The state agency has been a full partner since the beginning, contributing funds and staff time. Four ODFW staff work full time on Starkey, led by Bruce Johnson, long-time Starkey Project leader for ODFW. On the first four studies, the Forest Service took the lead on the roads and timber studies, and ODFW took the lead on the forage and breeding bull studies.

Starkey and all its activities are administered cooperatively by PNW Research Station and La Grande Ranger District, part of the Wallowa-Whitman National Forest. "The Wallowa-Whitman National Forest provided funds for the original fence and much of the road management and traffic monitoring for the first 10 years," Vavra says. "The Forest Service at all levels—national, Pacific Northwest Region, Wallowa-Whitman National Forest, and La Grande Ranger District, and PNW Research Station—has supported Starkey."

Wisdom adds, "We've had strong support from hunters and the Rocky Mountain Elk Foundation. Other partners who have been essential include Boise Cascade Corporation, National Council for Air and Stream Improvement (NCASI), and the Eastern Oregon Agricultural Research Center of Oregon State University." Boise Cascade Corporation did the timber harvest that was needed as an experimental treatment for the intensive timber management study, and the company has been an ongoing research partner.

Funding is provided by the USDA Forest Service, ODFW, the Rocky Mountain Elk Foundation, and a variety of other sources. Research partnerships occur with Boise Cascade Corporation, NCASI, Oregon State University, the University of Alaska Fairbanks, University of Idaho, University of Montana, Purdue University, and other organizations. In total, over 40 partners, including federal and state agencies, universities, tribal nations, and private organizations, have participated in the project.

Getting the results out to managers, hunters, and other interested people has always been a vital part of the Starkey Project. The Starkey staff host many field tours and educational workshops for hundreds of people, including agency staff, professional societies, tribal foresters, Congressional staff, international visitors, and college students. A major symposium in 2004 emphasized how the findings relate to land and resource policies and management.

Frank Vavra

Many partners contribute to the success of the Starkey Project. A crew works on the game-proof fence that separates study areas.

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

Additional Studies

As Starkey Project investigators completed their initial studies during the 1990s, they used the project's research technologies to study several emerging resource issues in public land management. New research completed or underway includes the following studies.

- Effects of fuel treatments on the distributions of and forage conditions for mule deer, elk, and cattle.
- Deer and elk responses to off-road recreation, including travel by all-terrain vehicles, horseback, mountain bike, and foot.
- Development and testing of new road models for elk management.
- Evaluation of elk sigbtability models to improve methods of population estimation.
- Synthesis and modeling of factors that affect elk vulnerability to harvest by hunters.
- Energy costs for deer and elk exposed to differing levels of hunting pressure and hunting season designs.
- Hourly, daily, and seasonal changes in movements and habitat use by mule deer and elk, measured at fine resolution with one of the largest ungulate data sets ever amassed.
- Effects of sampling design on resource selection and home range estimators for wildlife research.
- Exploration and use of diffusion theory to model animal movements.
- Consideration of nutritional demands and animal condition to enhance elk productivity.
- Effects of ungulate herbivory (grazing and browsing) on vegetation development and ecosystem processes.
- Validation of elk resource selection patterns to strengthen inference space for management.

These and other follow-on studies have yielded additional benefits to managers, and results are now available in a variety of scientific publications.

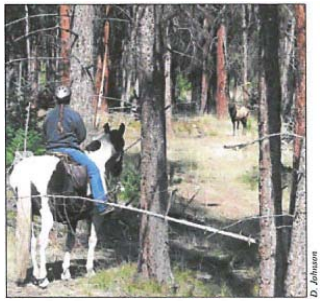
The Starkey Project in the 21st Century

Starkey's original research, completed in the 1990s, has been the catalyst for new studies underway in the project's first decade in the 21st century. "The new studies for the next 10 years are an evolution of the original study questions," Wisdom explains.

Studies are underway at Starkey on how fuel treatments such as thinning and prescribed fire affect elk, deer, and cattle.

Wisdom continues, "In the 1990s, we documented the effects of roads and traffic on elk. The follow-on questions are about the effects of off-road recreation on elk and mule deer." The off-road recreation study, which began in 2002 and was funded by the Oregon Department of Parks and Recreation, compares the effects of four typical off-road recreation activities—all-terrain vehicles, hiking, mountain bike riding, and horseback riding—on elk and deer. Animal responses are being measured in terms of how far elk and deer move and how much energy they expend before, during, and after the off-road recreation activity. Eventually, the results should be useful in managing recreation on national forest lands.

As far as timber management, Vavra explains, "We expect that in the next 10 years, managers will be focusing more on fuel reduction than on standard commercial harvest." So studies are underway at Starkey on how fuel treatments such as thinning and prescribed fire affect elk, deer, and cattle.


D. Johnson

New studies at Starkey are examining how popular forms of recreation affect elk.

Ungulate grazing and browsing is probably an ecological force in western North America but, Vavra points out, "We don't know the effects of different levels of grazing by cattle and elk on plant succession, soil nutrients, biodiversity, and ungulate nutrition, as measured over long periods, such as 10 years or more."

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

For example, it's well known that elk and deer are attracted to the flush of green vegetation in recently disturbed areas, such as after fire or logging, and thus their herbivory is likely to influence the composition of the developing plant communities. Little is understood, however, about how ungulate herbivory may eventually affect the structure, composition, and productivity of entire forest and rangeland ecosystems. Herbivory might influence successional trajectories after wildfires or fuel treatments or be a factor in the spread of invasive plants, but scientists have limited knowledge about what happens. New studies at Starkey are aimed at gaining a better understanding of how all these ecological forces interact to affect biological diversity in forest ecosystems.

New questions are coming up about elk and mule deer productivity. Big game surveys in many Western States are showing declining productivity in elk and mule deer populations, a disturbing trend that is so far unexplained. The Starkey scientists and partners and land managers have a common interest in understanding how well elk and deer will fare in the forests and rangelands of the 21st century, and new studies are being discussed to address these issues.

"The enclosures at Starkey allow us to manipulate elk, deer, and cattle numbers for new research to evaluate these species' productivity in relation to changes in their density and under different cattle grazing systems," says Wisdom. "We are discussing ways to design new studies to evaluate these factors in relation to ungulate productivity." Again, the Starkey enclosures, some of the largest ever constructed for research, continue to provide a mechanism for conducting landscape-scale experiments previously not thought possible. Combined with a new GPS telemetry system and a myriad of essential support technologies, the future of the Starkey facility for ungulate research appears bright.

"We expect that results from ongoing studies at Starkey will continue to be used to modify policies, management standards and guidelines, hunting regulations, and timber sale planning throughout western North America," says Vavra. "We will continue to respond to management needs for new knowledge about the role of elk, mule deer, and cattle in managed forests, and to design research accordingly." Combined with an ongoing technology transfer program to share results efficiently with managers, and in forms easily understood for management applications, the Starkey Project appears likely to continue its role as an important provider of scientific knowledge about ungulate management well into the future.

Mike Wisdom

Starkey scientists share research results with others. Over 200,000 people have toured Starkey or heard a presentation. Even more have read reports and articles about research results.

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

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U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. Information about all the Station's research and access to all Station publications. http://www.fs.fed.us/pnw. (1 December 2005)

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PNW Science Update
U.S. Department
of Agriculture
Pacific Northwest
Research Station
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Portland, OR 97208-3890
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Got Science?

Get the latest science and management strategies on natural resource issues at upcoming conferences, cosponsored by the USDA Forest Service Pacific Northwest Research Station.

Managing for Biological Diversity in Northwest Forests: Strategies and Opportunities

June 5–7, 2006
Red Lion Hotel on the River,
Portland, Oregon

For more information: http://www.fs.fed.us/pnw/about/programs/fsd/biodiversity.shtml

This conference will review important concepts and demonstrate tools for managing Pacific Northwest forests for biological diversity. Focus is on conserving biodiversity while balancing management goals.

Advances in Threat Assessment and Their Application to Forest and Rangeland Management

July 18–20, 2006
Millennium Harvest House, Boulder, Colorado

For more information: http://www.forestencyclopedia.net/encyclopedia/threats

This 3-day conference will explore the latest information on the assessment and management of environmental threats, including invasive species, insects, diseases, uncharacteristic fire, severe weather, climate change, and wildland loss.

More information coming in June *Science Update* on this conference:

Forest land conversion and forest conservation strategies

Fall 2006
Bend, Oregon
Exact days and site to be determined

This conference will explore rates of development in Pacific Northwest forests and definitions of forest land conversion, highlight successful forest conservation strategies, and provide on-the-ground conservation tools.

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Hunting and Angling on the Line:

Transmission Policy, Siting and Sportsmen's Interests

Theodore Roosevelt Conservation Partnership

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Hunting and Angling on the Line: Transmission Policy, Siting and Sportsmen's Interest

Introduction

Energy and electricity are fundamental to America's way of life. Increasing demands mean that we must expand our capacity to move energy from one place to another. With our nation's growing reliance on renewable energy sources – solar, wind, geothermal and wave – to address climate change, coupled with the fact that we are straining our existing capacity from traditional energy-producing sources, such as oil, coal and gas, the need for additional capacity and new transmission lines is irrefutable.

As the country moves toward a greener energy future, renewable and alternative energy production will be increasingly promoted and subsidized, and the use of natural gas and clean coal will be expanded. All of these activities require new transmission capability. Ten thousand to 30,000 miles of new, high-capacity transmission lines could be needed in the next 20 years to meet federal and state renewable-energy mandates.

Sportsmen and conservation groups recognize the country's need for cleaner energy and a more reliable power grid and transmission infrastructure. Solar, wind, wave, geothermal, biomass and even nuclear energy production are potentially cleaner alternatives to traditional power production. All have advocates who promote them as a means of addressing changing climatic conditions and other impacts to natural resources.

Technological advances place these cleaner sources of energy within our grasp. Yet they are abundant mostly in wild areas – deserts, mountain ranges, river valleys and plains – that are important to fish, wildlife and sportsmen. Wildlife do not respect ownership boundaries and use a mix of public and private lands depending on habitat conditions and seasonal needs. Proper stewardship of both private- and public-lands habitats is critical to sustaining healthy populations of fish and wildlife.

The potential impacts of transmission on the nation's public lands has lately drawn much attention – and rightfully so. But private lands also could be adversely affected by transmission siting related to either renewable energy projects or new traditional power plants.

In the West, the proportion of private and public lands is roughly equal. Overall, 67 percent of the nation's lands are privately owned, a fact that makes potential impacts to private land stewardship the first order of importance to fish and wildlife management. Research by Dr. Delwin Benson at Colorado State University evaluated the importance of private landowners to state fish and game management and found that agency directors called private land cooperation a critical factor in their ability to properly manage fish and wildlife populations, particularly game species. Our concern – that productive conservation efforts from all parties are being overlooked and sportsmen's interests are being neglected in the planning process – motivated our taking a closer look at the issue.

The TRCP's Approach to Investigating Energy Transmission

Our goal in this analysis was to determine how the sporting community's interests (fish and wildlife management, hunting and fishing) were taken into account during transmission policy implementation and the planning (typically referred to as "siting") of a transmission project. Of interest is not only ***how*** sportsmen and fish and game species are considered but also ***when*** they are engaged in the process.

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Hunting and Angling on the Line: Transmission Policy, Siting and Sportsmen's Interest

The TRCP's intent in undertaking this project was not to understand or investigate every law, policy and transmission project but to review existing projects as examples of how conservation, particularly benefits to sportsmen from private landowners' natural resources stewardship, is being addressed in the rush to put new transmission lines on the ground.

The TRCP was fortunate to be able to visit with private landowners about their conservation approaches but is not trying to vocalize, represent or advocate for their issues in any way other than to identify and promote awareness of the conservation benefits of their approach to land and resource management. Any misrepresentation or errors are unintentional.

Goals:

- To determine if sportsmen's interests are being *adequately addressed* in current power transmission siting and policy decisions
- To determine if conservation-minded private landowners are being *properly engaged* in the transmission planning process and, if not, how wildlife and fisheries management and habitat conservation *might be affected*
- To provide *recommendations to improve* transmission policy and siting practices to address fish, wildlife, and hunting and fishing needs for sustainable conservation and stewardship.

Establishing the Need for Transmission

Since the early 1990s, the U.S. Department of Energy and the Federal Energy Regulatory Commission have affirmed that U.S. transmission infrastructure is old and ineffective at delivering current and new forms of power reliably and cost effectively. Alternative energy production requires new lines to distribute power, and existing infrastructure requires renovation.

Future transmission considerations will influence the move to new technology using what often is called a "smart grid" -- essentially a more modern, efficient system for transmitting power. The National Renewable Energy Laboratory reports that in order to meet a goal of providing 20 percent of America's power needs with wind energy alone, 22,700 new miles of new electrical lines must be constructed. This would be in addition to the more than 160,000 miles of lines already in existence.

The map below shows the potential new high voltage needed to upgrade the grid. It does not include the moderate or low voltage lines that would serve residents or collect power generation.

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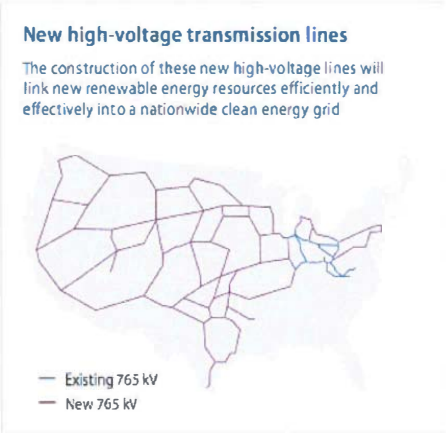

Source: American Electric Power.

National security, reliability, cost, economic development and renewable energy development are the principle factors behind the drive to upgrade and add capacity. The current approach to electric transmission uses a grid structure to manage production, capacity, load and delivery. This grid is served by three regional "interconnects" (Eastern, Western, Texas) that utilize multiple technologies.

Coordinating these interconnects' operations has proven difficult. There is very little ability to transfer power between grids and therefore the ability to move electricity from where it is produced to where it is needed is limited. Because of this compatibility issue and regional issues with renewable energy production, the future of the grid is uncertain – and contributes to a disjointed approach to the development of new transmission. Because of the complexities and difficulties in systematizing transmission, the Department of Energy instituted the Regional Transmission Expansion Project to facilitate better coordination between utilities and planners throughout the nation.

The Obama administration supports the creation of a new energy economy by promoting clean energy production, energy efficiency and construction of a smart grid transmission system. The president has committed to a "clean energy economy" that focuses on the production of energy from renewable sources that will reduce dependence on foreign oil, create new jobs and lessen environmental impacts. Initiatives include "25 x 25," an effort to derive 25 percent of our electricity from renewable sources like wind, solar and biofuels by 2025.

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Smart grid technologies are considered the ideal replacement for many existing lines because they will increase efficiency and transfer power much the way two-way communication systems work. Whether America increases the efficiencies of existing lines or installs new lines, transmission will dramatically affect fish and wildlife conservation and stewardship of wild places.

Transmission: How it's Done and Who Does it

The Federal Energy Regulatory Commission regulates the interstate trade of electrical power and its required transmission interconnections. Utilities that are owned by the federal government, states and municipalities are not controlled by FERC but must adhere to federal regulations if they buy or sell on a wholesale market or use the transmission capacity of jurisdictional utilities. FERC and DOE are concerned with the reliability and efficiency of service from the aging and uncoordinated grid infrastructure in the continental United States. DOE is charged under the Energy Independence and Security Act of 2007 with modernizing the nation's electricity grid to improve its reliability and efficiency.

Federal involvement aside, considerable control over the planning and placement of transmission lines remains with respective states and their public utility commissions. A relatively new movement by FERC to create regional organizations like the Western Electrical Coordinating Committee is an attempt to establish an operating entity over transmission, but DOE acknowledges that many legal hurdles remain before the future approach to controlling interstate transmission can be determined. As previously stated, DOE recently initiated the Regional Transmission Expansion Project to facilitate better coordination and planning.

Jurisdiction over siting energy facilities varies from state to state. In some states, siting authority rests with a local branch of government, whereby county commissions, planning and zoning boards, or other local government departments are responsible for reviewing and approving renewable energy production sites and other energy facilities. Other states retain primary siting authority at the state level through Public Utilities Commissions, or PUCs, which grant permits through a Certificate of Public Convenience and Necessity (CPCN). CPCNs are usually sought or required before other planning, including environmental planning, is undertaken. They vary by state and are not supposed to determine routes or other site-specific placement factors – but often do so to streamline the permitting process. State PUCs do minimal analysis on environmental impacts during the CPCN process and most often do not consider anything but those species required by law or identified by state game and fish agencies.

The chart below is from the Western Governors' Association report on transmission and identifies the timeline and processes needed to gain approval and permitting for a typical transmission line in a Western state. The earlier in the timeline that environmental, conservation and landowner involvement commences, the better the potential outcome will be for sportsmen's interests.

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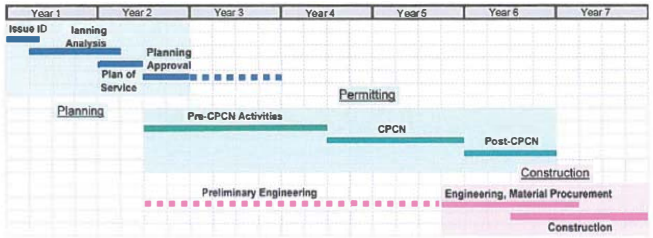
Hunting and Angling on the Line: Transmission Policy, Siting and Sportsmen's Interest



Notes:

1. This provides a general timeline. This timeline of activities can be generally applied to projects 30 to 150 miles in length, involves more than 3 local jurisdictions, 2 to 3 federal agencies, 1 to 3 state agencies, and more than 30 land owners. The planning process is a key uncertainty.
2. This timeline assumes a certificate of public convenience and necessity (CPCN) is needed.
3. Issue Identification: The transmission project may be needed for reliability, economic reasons, and/or for renewable resources.
4. Planning Approval: please see CAISO generator interconnection process and Order 890 planning process
5. Pre-CPCN Activities include (a) project scope definition, (b) project study area definition, (c) environmental information identification and compilation, (d) informational exchange with community leaders, (e) consultation with land use and natural aresources management stakeholders, (f) preparation of Proponent's Environmental Assessment, and (g) preparation and filing of permit application.
6. CPCN Process: please see CPUC timeline. Actual schedule depends on, among other things, (a) environmental setting and potential impacts, (b) project complexi y, and (c) level of public interest.
7. Post-CPCN Activities include right-of-way acquisition and resource agency permits acquisition. Additional time is needed if eminent domain action is necessary.

Regional groups, in particular the WGA, have worked cooperatively on interstate transmission projects by identifying potential corridors and designating renewable energy zones. Efforts are under way by regional transmission organizations to improve coordination and stakeholder involvement in the expansion of transmission capacity within regional grids and interconnections. Industry associations such as the Solar Energy Industry Association and the American Wind Energy Association promote renewable energy technology and lobby for industrial-scale projects as business and industry seek entrepreneurial opportunities and the nation seeks to produce more power from renewable sources.

Irrespective of what entity controls the placement of transmission lines, a strong desire for energy security and reliability have focused attention on a carefully planned, regional grid expansion of transmission lines that would connect each grid to a national grid; feature efficient, smart grid technologies and accommodate the proliferating renewable energy production facilities. Solar, wind, geothermal and biomass gasification systems, along with increased use of natural gas, are viewed as possible solutions to the production of carbon emissions and reduction of impacts of global climate change; however, the current transmission network's planning process, which focuses on individual projects proposed by utility companies, fails to address increased production from those renewable technologies and the landscape-level changes that result.

Eminent domain, the power to appropriate private land for a public purpose, rests in the state's hands for power transmission, but recent proposals could give that power to the federal government for major interstate transmission projects. Many private landowners see this as a very real threat, so much so that

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some express doubts about the future management of their lands if eminent domain is used to place transmission lines on properties.

Citizen and environmental groups, including the Energy Future Coalition and Western Resource Advocates, have helped popularize the notion of renewable energy, particularly wind and solar, to deal with carbon production and climate change. Although these forms of renewable energy are less carbon polluting, the current reliability standards do not allow for renewable energy to replace on-demand energy production, and both require increased transmission capacity and footprints. The infrastructure of transmission lines and related development of energy resources to create electricity will affect the physical environment in ways that can resemble traditional energy development. Transmission line infrastructure, condemnation of private lands through eminent domain, loss of land value and use, and landscape changes related to energy development all influence property owners' receptivity – and resistance – to transmission lines by property owners.

When Do Fish and Wildlife Enter the Picture?

Federal Role

Planning and other actions by federal agencies require adherence to the National Environmental Policy Act. Under NEPA, federal projects are subject either to detailed environmental impact statements, or EISs, or less detailed environmental assessments, or EAs, for actions that have a federal nexus. An EIS is required when "significant" impacts are posed to resources; if not, an EA is employed. Both EISs and EAs must analyze a range of alternatives and impacts to environmental resources.

Typically, NEPA evaluation is part of the permitting process only after initial planning has been undertaken by the organization proposing the activity. This means that environmental factors, including those affecting fish and wildlife, are not fully considered until the commencement of "Pre-CPCN Activities" (CPCN stands for *Certificate of Public Conveyance and Necessity*) – years after the project planning process has begun (*see chart above*). Federal NEPA analysis is often limited to evaluating impacts (and therefore their decisions) to federal lands within a project. This creates a problem in transmission line planning when there is a federal lead on a project that contains a mix of federal land and private land within a single project. Affected stakeholders or resources outside of federal control that may have conflicts with proposed projects or are notified only after preferred routes are identified often seem like they are not given the attention they deserve, particularly if the project is dependent on the route on public lands. These mixes of landownership and disjointed project planning and evaluation result in conflicts over project location, timing delays, and polarization of project proponents and affected stakeholders.

The U.S. Fish and Wildlife Service (FWS) is the management authority for plant, animal, and bird species listed under the Endangered Species Act (ESA) and migratory birds through the Migratory Bird Treaty Act (MBTA) and acts as a technical advisory agency on other sensitive species not covered under ESA or MBTA. The FWS can make management recommendations for other fish and wildlife species if warranted or sought by project cooperators. However, FWS primarily focuses on those species that ESA and MBTA requires but usually does not address species of concern to sportsmen, such as big-game (the exception being waterfowl which is managed under MBTA). The FWS has tried to anticipate needs for some wildlife during energy activities and has worked as cooperators on power line and wind turbine

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guidance, most recently on the *Voluntary Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines.*

The Bureau of Land Management likewise has collaborated on power line and wind energy guidance for fish and wildlife and has completed programmatic EISs for wind, solar and oil shale along with designating energy transmission corridors in the west. In each of these BLM considered birds, bats and endangered species without paying much attention to common species or game animals, and no attention to how hunting or fishing might be affected.

The BLM typically defers detailed evaluation and analysis to the project-specific level, where the agency often employs state game and fish agency input for state-managed wildlife species. The BLM is not required to follow recommendations from these state agencies but often considers them during project development. The BLM has also focused on the use of Best Management Practices to mitigate impacts, but they are voluntary. The U.S. Forest Service takes a similar approach in addressing transmission and energy projects and recently has begun to develop national guidance to evaluate wind energy development proposals on Forest Service lands.

State Role

State fish and wildlife agencies have the authority to manage fish and wildlife within their borders, except for migratory birds and endangered species, which are managed by the FWS. States provide input through project-level involvement and review and through the development of land use planning for FS or BLM administered lands. Because of their non-regulatory role, most state fish and wildlife agencies only provide recommendations to the proposed impacts and role of mitigation. They may prefer to see certain actions implemented, but their input is treated as one of many that project managers receive during the project review and approval process. States have no authority for inspection or enforcement of actions that are taken after approval unless they result in direct losses of individual fish and wildlife.

Some states have begun developing guidelines for actions within fish and wildlife habitats or mitigation activities. Wyoming has developed guidelines for wind energy development and mitigation during oil and gas development. No state has specific guidelines for transmission and impacts to recreation, and private land stewardship is rarely considered in formal input on projects. State fish and wildlife agencies are linked through nonprofit associations – such as the Association of Fish and Wildlife Agencies (AFWA) and the Western Association of Fish and Wildlife Agencies – to enable better coordination on national and regional fish and wildlife issues. Through these associations and collaborative efforts on behalf of groups like the Western Governors' Association, states provide input on policy and coordinate actions on projects or plans that cross numerous state boundaries. AFWA's Wind Energy and Transmission Subcommittee developed a set of voluntary guidelines for wildlife, but they focus on birds, bats and sensitive species. AFWA has staff that work on energy and transmission issues but puts primary input on energy issues and policy through the appropriate committees within the functional structure of AFWA and the associated state fish and wildlife agencies.

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NGO/Stakeholder Role

Non-governmental organizations (NGO) and other groups and stakeholders are involved in various aspects of transmission policy and project development. Because of their makeup, NGOs usually provide input only through advocacy or lobbying at the policy level and by offering project-specific input through NEPA or in state-level processes. Some NGOs are members of committees or working groups with federal and state agency personnel, industry, landowners and other stakeholders.

Regional electrical transmission councils have formed stakeholder groups, and the WGA is active in addressing the problems of transmission expansion and wildlife; all provide input on planning and policy to address the needs of states and utilities. These groups recognize the need for increased transmission and the obstacles for project implementation, and the WGA has specifically identified corridors and renewable energy zones to promote development in lower-conflict areas while addressing the needs of fish and wildlife.

Industry has created NGOs to address fish and wildlife issues, primarily from the energy production side and not transmission. The American Wind Wildlife Institute and National Wind Coordinating Collaborative are two organizations tasked with coordinating fish, wildlife and environmental issues and collaborating with industry.

Green energy, including transmission, is of significant concern to some environmental organizations. Prominent national groups that have been involved include the Sierra Club, National Wildlife Federation and National Resources Defense Council. These groups' focus is on restricting development to already affected areas and protecting public lands. Some eastern land trust NGOs have addressed the impacts of transmission line construction on conservation easements.

Involvement by the Sporting Conservation Community

Unlike the major environmental NGOs, which focus on birds, bats, sensitive species, green energy and public lands, sporting and conservation groups generally are uninvolved in transmission policy or projects. While exceptions exist, with some groups focusing on how to use transmission ROWs to improve habitat for game species, most sporting and conservation NGOs simply do not have the resources to participate in the hundreds of projects being proposed across the country at any given time, nor do they have the technical expertise to be involved in the policy debate. Many such groups are aware of the impacts transmission projects can have on fish and wildlife and on the landscape use changes that can result from increased electrical production from renewable energy sources yet remain uninvolved.

The absence of specific science, particularly cause-and-effect science, on the effects of transmission lines on fish and game species contributes to the lack of involvement of many groups that focus on energy issues. Reliable knowledge regarding the long-term effects on individual species is insufficient, and projects are being rushed to the point where knowledge learned from hard data could come at the expense of the species or local populations. No published research is currently available on the impacts to hunting and fishing from transmission or on change of landowner management affecting conservation due to conflicts with projects.

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Typically, transmission projects are industry-driven plans with industry-funded impact studies pursued in collaboration with the appropriate federal or state agencies. Environmental concerns often do not consider the role of private landowners and their efforts to conserve habitat and fish and game species or private-lands access programs. Cooperative actions and formal land-use designations frequently are recognized only as obstacles rather than as values to be addressed during environmental evaluations. The Land Trust Alliance, a national NGO that focuses on formal conservation contracts on private lands for open space, agriculture and wildlife, remains concerned about the impacts to private-lands conservation easements and promotes increased recognition and attention to the threats transmission plays on private lands.

As planning processes progress – both in individual states and through regional efforts such as regional coordination councils – national groups have begun to offer environmental and conservation input. Whether those concerns are entering the conversation early enough to minimize the impacts of transmission siting on fish and wildlife resources decisions remains unclear. Nevertheless, participation by sportsmen-conservationists remains minimal. State wildlife agencies have staff biologists and the principle role of stewarding state natural resources associated with sportsmen, but their ability to regulate transmission matters is limited to advisory roles. Of all the efforts examined for this project, no identified sportsmen group was part of the official proceedings. Individual sportsmen are involved, but they do not represent any designated sportsmen groups.

AFWA's *Electric Transmission Line Guide for State Agencies* outlines specific steps that state game and fish agencies should undertake to conserve important natural resources during transmission siting. Developed through consensus, these guidelines do not address impacts to hunting or fishing or private-lands conservation efforts. They do address avian collision impacts, avian electrocution impacts and habitat impacts. The habitat recommendations include avoidance of wetlands, reclamation, use of existing right of ways, impacts to forested habitats and stream crossings. (The recommendations are available for download on the AFWA website.) AFWA and other groups have participated in forums to address transmission impacts and made recommendations regarding fish and wildlife, including data reliability, data standardization, early coordination and the need for a standardized process for participation by state agencies.

Case Study Examples

The TRCP surveyed transmission projects throughout the western United States and elsewhere, reviewing online documents and media coverage of controversies associated with the projects. This effort resulted in our decision to focus on three separate "case studies" of how sportsmen's interests were potentially being affected by these projects. Landowners for each case study were contacted, and TRCP staff visited each proposed project area to determine what conservation resources or values were potentially threatened by project development.

Three properties targeted for transmission line siting are profiled in the sections that follow. While each is located in a different landscape, all play important roles in fish and wildlife habitat. Each illustrates a different landowner response to a transmission project routing plan, but all three focus on the potential impacts these line sitings could have on fish, wildlife, habitat and the sportsmen who utilize those resources.

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Oregon – Elksong Ranch

The Elksong Ranch encompasses 7,000 acres of mixed conifer forest and rolling hills outside La Grande, Ore. The ranch is home to large numbers of elk, the fruit of many years' labor resulting from owner Ross Seyfried's dream to "find a piece of land, rehabilitate it and make it an elk factory." Seyfried, a fourth-generation rancher from Colorado, renowned marksman and writer, spent more than five years finding a place that fit his criteria – one that could produce elk and serve as a model for how landscapes can recover given the right vision and a nurturing hand.

Seyfried purchased the Elksong in 1996. He recognized that years of out-of-control logging and over-grazing had ruined its streams and dramatically diminished its fish and wildlife, particularly game species. Seyfried and his son Rich worked to address these problems, modifying the landscape, how the land was used and how humans, wildlife and livestock interact. The results were nothing short of amazing: The Elksong Ranch has become, in Seyfried's words, "the ultimate elk factory."

Seyfried doesn't allow predator hunting or control on the Elksong. He changed the grazing management from intensive cattle grazing to seasonally grazed cattle to control grasses. He also limited the yearly harvest of game animals and witnessed a remarkable return of elk, with more than 1,000 elk calves born on the property annually.

The Elksong participated in the Oregon Plan, a legislative action to help restore watersheds, and utilized state funds to repair streambeds and banks where cattle had destroyed the fish habitat. The ranch's ongoing conservation activities are funded by controlled elk harvest, with steps taken to avoid disturbing the normal rutting behavior of bulls and breeding cycles of cows.

As the Elksong is bounded by publicly accessible hunting, hunters apply for the Starkey Unit (Oregon Department of Fish and Wildlife Elk Hunt Unit 52) to compete for one of the toughest tags in the state to hunt trophy bulls. As the Starkey Unit is 67 percent public land – mostly national forest – and receives a tremendous amount of hunting pressure, private lands like the Elksong serve as secure refuges from the stressors that hunting can bring. Due in great part to the change in the Elksong's management since 1996, the number of branched-antlered and mature bull elk on the property has increased from near zero to several hundred, as evidenced by the elk sheds Seyfried has collected over the years. He credits habitat restoration, limited unnatural use of landscape, natural predation and controlled hunting as reasons for this success.

While Seyfried was addressing restoration challenges, he never dreamed that his next challenge would involve defending his property against the encroachment of power lines to support renewable energy production in Oregon. One day while going about his ranch duties, Seyfried noticed surveyors placing markers through the middle of the Elksong. The markers plotted a preferred route for a proposed transmission line. Until then, Seyfried had been unaware of this project – and he didn't like learning of it unexpectedly, after markers already were set in place.

The proposed transmission line through the Elksong formed a section of the larger Boardman to Hemingway line proposed by Idaho Power. Seyfried began to investigate the proposal and get involved; subsequently, he was invited to participate in the project's Central Project Advisory Team along with other affected stakeholders and officials. He also met with Idaho Power officials to express his concern over the future of the Elksong and the proposed transmission line route. Seyfried's main reservation is

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that the construction and subsequent operation and maintenance of the transmission line is incompatible with his goals for the ranch and will affect his vision of managing a place where "elk can do what elk do, without too much intrusion from man." He believes that alternatives to the proposed route exist that will address his needs and values and meet project requirements, and he is advocating for those alternatives to be selected during the project development.

Seyfried, a lifelong hunter-conservationist, is like most Americans in that he supports renewable energy and economic development. But he does not support the invasion of workers, trucks and metal power lines crossing a land that has experienced incredible conservation gains simply through reduced human activity. The threat of a power line running across the Elksong and his hard work being squandered is enough to possibly drive this self-described "conservation fanatic" out of the Oregon country and away from the Elksong. Seyfried believes his efforts to restore the Elksong are of value to everyone and the fish and wildlife deserve the consideration of a modified siting plan. If Seyfried sells the ranch, which is likely should the transmission line be sited in the middle of his property, the new owners might not be interested in continuing his strong conservation efforts.

To date, the transmission project is proceeding. Further evaluation of how the project could affect public lands has necessitated NEPA review. Seyfried's concerns haven't changed, but the proposed route has been altered numerous times. Despite his efforts and involvement in processes designed to address conflicts and concerns, the preferred route currently runs right through the middle of the Elksong. Industry officials have shown alternative routes and even hinted that they might be inclined to change the route to address Seyfried's concerns for the Elksong, but it appears those efforts are no longer at play.

Seyfried believes the intense human activity required to construct the power lines and accompanying roads would result in too much disturbance for the elk and other wildlife to function as they do under current management of the ranch.

Elksong Ranch: Quick Facts

- 7,000 acres of mixed conifer habitat outside La Grande, Oregon
- Surrounded by public lands
- Large game and nongame species population, large breeding elk herd
- Managed for restoration of habitats, reduced grazing and natural systems since 1996
- Threatening project: Idaho Power's Boardman to Hemingway transmission project

Hunting and Sporting Benefits of the Area (Starkey Unit S2)

Elk

- 33.7 elk per square mile
- 5,000 hunters per year
- 32,601 hunter days per year ($2,086,464 to Oregon economy, $64/hunter day)
- 399 bulls harvest
- 513 total harvest
- 10-percent success rate

Mule Deer

- 15.3 deer per square mile

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- 1,969 hunters per year
- 13,716 hunter days per year ($809,244 to Oregon economy, $59/hunter day)
- 263 bucks harvest
- 309 total deer harvest
- 16-percent success rate

Indicators of Quality of the Area

- Moderate to hard draw for elk, limited-quota mule deer
- Elk – 2009 – 403 bull/either sex elk tags –3,227 total applicants (12.5 percent chance)
- Deer –90 buck tags/1,417 applicants (6.4 percent chance)

Conservation Contributions by the Elksong

- Elk, white-tailed and mule deer, black bear, wild turkey, ruffed grouse, blue grouse, valley quail
- 15 elk per year by guided hunters after the rut
- Estimates 1,000 calves born on the ranch annually
- Winters 2,000-3,000 elk, including hundreds of bulls
- Habitat and watershed restoration
- Reduced and targeted grazing regime to benefit elk

Project Involvement by Elksong

- Participating in public process and NEPA
- Project citizen advisory committee
- Direct communication with Industry officials

Threats to Conservation from Project

- Loss of critical breeding habitat for elk and deer
- Diminished quantity and quality of bull elk harvest
- Change in conservation-focused management
- Increasing human presence in area critical to fish and wildlife
- Increased cattle grazing competing with game species for forage
- Return to overharvest of game
- Loss of deer and elk security habitats during hunting season

Colorado – Trinchera Ranch

Located in south-central Colorado amidst the Sangre de Cristo Mountains in the San Luis Valley, the 177,700-acre Trinchera Ranch is the largest privately deeded ranch in the state. Its history dates back to 1843, when the Mexican government made a land grant there to encourage settlement as a means of establishing territory north of the Mexican border. The ranch encompasses high-alpine habitats, conifer-dominated mid-slope habitats, aspen and pinyon-juniper lower elevation benches, and sagebrush and agricultural bottoms. Riparian habitat and perennial streams cut through the mix.

The ranch is home to bighorn sheep, elk, mule deer, black bear, eagles, mountain lions, waterfowl, snowshoe hares, numerous trout species (including the native Rio Grande cutthroat trout) and abundant

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

nongame and avian species. From the top of 14,000-foot peaks to the irrigated fields at the valley floor, the Trinchera Ranch is a unique and valuable landscape for conservation. But it wasn't always this way.

In 1969, Malcolm Forbes purchased the Trinchera and began a nearly 40-year journey of conservation stewardship. One of his first orders of business was to hire a ranch manager to focus on wildlife and stewardship of natural resources. In addition to keeping the property a working ranch, the Forbes family integrated hunting and fishing into the business plan. In 1982, the family bought the Blanca Ranch north of the Trinchera, forming the ranch as it exists today.

The Forbes family went to considerable lengths and expense to improve conditions for fish and wildlife and restore areas that were degraded from years of abuse. The Colorado Division of Wildlife worked with the ranch to reintroduce bighorn sheep and Rio Grande Cutthroat trout – a tremendous success, with the ranch now providing sheep and trout for transplant elsewhere. The ranch also attempts to alleviate damage to agricultural crops on adjacent lands by providing forage and space for deer and elk to live without conflict.

The Trinchera is the birthplace of the Colorado Division of Wildlife's Ranching for Wildlife (RFW) program, which incentivizes private ranches to manage lands for wildlife and access to the public in return for a set number of hunting licenses. The ranch supports wildlife researchers and state and federal wildlife agencies and provides an outdoor laboratory to conduct research. In addition to the RFW commitment, the ranch allows big-game hunting and firewood gathering and hosts special events aimed at increasing people's involvement in outdoor activities.

The Forbes family donated an 81,000-acre conservation easement through a Colorado land trust, the largest in Colorado history, which will help ensure the continuation of the ranch's wildlife legacy. Ultimately, the Forbes family sold the Trinchera to another conservationist, one who also values fish and wildlife. In 2007, Louis Bacon and his family acquired the ranch and committed to continue the stewardship and management that the Forbes family had begun.

Louis Bacon, a hedge fund manager, is a dedicated conservationist and a lifelong sportsman. He owns properties around the world, managing them for fish and wildlife. Bacon saw a gem of the Rockies in the Trinchera, one with a sound conservation program and outstanding natural resources – and that demanded management as a single landscape. His commitment to conservation facilitated the sale of the ranch, as the Forbes family knew Bacon would uphold the Trinchera's responsible management for the benefit of fish, wildlife, and water.

Many residents of the San Luis Valley wondered if the Forbes family legacy would be perpetuated after Bacon took possession of the Trinchera. Not only did Bacon continue what the Forbes family had started, he expanded on it and now is one of the largest employers in Costilla County. Multiple generations work there, including the current ranch manager, who grew up on the ranch as the original ranch manager's son who was hire by the Forbes family.

The Trinchera and its employees are part of the local community, economy and future. Extensive stream restoration projects, limited cattle grazing, managed wood harvest as a component of forest control, and wildlife habitat projects have contributed to the area's reputation as one of the best elk hunting

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areas in Colorado. Surrounded by private, state and federal lands, the Trinchera and its populations of game species such as elk, deer, bear and cougar provide exceptional opportunities for sportsmen.

When Bacon bought the Trinchera, rumors and speculation abounded about new transmission lines being constructed from the San Luis Valley to the east. In October 2008, Tri-State Generation and Transmission Association and Xcel Energy announced their collaboration on transmission from the valley to Walsenburg, Colo., to the east. In May 2009, the companies filed for a Certificate of Public Convenience and Necessity, or CPCN, to the Colorado Public Utilities Commission.

The new line, called the San Luis Valley-Calumet-Comanche Transmission Project, would consist of a double-circuit 230 kilovolt line with 150-foot metal towers and cost an estimated $180 million. In August 2009, the USDA Rural Utility Service published in the federal register a notification of scoping for the project. Because of the federal nexus, NEPA evaluation was required, and formal evaluation of the proposal began. Based on comments received during the scoping period and additional comments and controversy, the RUS decided in November 2009 that an EIS was needed rather than just the environmental assessment that had been planned. But it was with the PUCs and the CPCN that the flames of controversy were fanned and the conflict began to take shape.

Under policy, the PUC is supposed to determine the need and feasibility given a project proponent's application during a CPCN determination with brief review of potential routes. But since transmission lines are a timely and expensive undertaking, utility companies often do a significant amount of work prior to and during the development of the CPCN application, which can include an overview of the environmental impacts and, more importantly in this case, preferred routing of the proposed line. In the application to the PUC, the preferred project route went through the Trinchera Ranch with minor alternatives for specific segments. Bacon and the Trinchera family filed testimony and briefs with the PUC, objecting to the omission of other alternatives that their own analyses indicated were less costly and less environmentally damaging.

The conflict was elevated to the press, which perpetuated a "wealthy outsider vs. home-grown energy utility" storyline. Adding fuel to the fire, Bacon filed legal arguments against what he believed was a breach of protocol by the PUC to have a route determination made by the PUC, along with other alleged misconduct by the utilities and regulators.

In November 2010, an administrative law judge issued a 300-page recommendation that the PUC grant the CPCN under certain conditions. In February 2011, the PUC approved the CPCN without the conditions proposed by the administrative law judge and recommendations of the PUC's in-house counsel. With the CPCN approved, the RUS is beginning to move forward with NEPA analysis and will be hosting route refinement workshops and other environmental analyses. Whether alternative routes, including the Trinchera-identified alternatives, will be considered is unknown, but it is unlikely given that the CPCN application identified a proposed route. In any event, the conflict remains, with both sides vowing to continue the fight for their interests.

What's lost in the debate is that Bacon's efforts in support of conservation, fish and wildlife, and hunting and angling are jeopardized. The Trinchera has been investigating a conservation easement on the Blanca portion of the ranch, the area where the transmission line is proposed. Bacon has spoken of his plans to manage the Trinchera as a whole landscape – possible because of the property's size and

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connectedness. If the Trinchera is forced through eminent domain to host a transmission line, Bacon could desist with his conservation plans. Other landowners and San Luis Valley residents also have voiced their concerns, and the Transmission Line Coalition, a group of landowners and other stakeholders concerned about the future of the San Luis Valley and energy development has formed. The utilities have stated that if the delay is too long or the proposed route changed, they might abandon the project.

What's at stake is a change in the management of Trinchera and the conservation stewardship of habitats provided to fish and wildlife. The habitat restoration programs administered by the ranch and coordinated with the state Division of Wildlife are an example of private landowners and public agencies working together for conservation and meeting the needs of both parties. The Trinchera has become an outdoor classroom for the study and research of wildlife. While Bacon battles public perception as a wealthy guy motivated by self interests, the results of his efforts on the environment and quality of surrounding sporting lands are compelling. Yet the future benefits of this stewardship – to fish, wildlife and the public – remain at risk.

Trinchera Ranch: Quick Facts

- 177,700 acres in the San Luis Valley of southern Colorado, including parts of the Sangre de Cristo Mountains
- Public lands adjacent on three sides of the ranch
- Dominates private land ownership in local habitat units managed by the Colorado Division of Wildlife
- High-quality hunting for elk, mule deer and bighorn sheep
- Managed for conservation efforts for 40 years, large intact habitats
- Threatening project: Tri-State and Xcel transmission line from the San Luis Valley to Walsenburg

Hunting and Sporting Benefits of the Area (Colorado Division of Wildlife Data Analysis Units (DAU))

- ELK-(DAU E-33) 19,280 elk, 89 percent private land
- Deer (DAU D-31), 2,220 mule, 97 percent private land with winter range the limiting habitat
- Bighorn Sheep (DAU S-65), 400 bighorn sheep
- Pronghorn (DAU A-16), 930 pronghorn

Indicators of Quality of the Area for Game

Elk

- 14 preference points to draw bull/either sex elk tag
- Average 740 bull harvest per year
- Average 31-percent hunter success
- 50/100 bull-to-cow ratio management objective (anything over 40/100 is considered exceptional)

Mule Deer

- 2-3 preference points to draw buck deer tag
- Average 125 bucks/85 does harvest per year
- 78-percent hunter success
- 51/100 observed buck-to-doe ratio
- 45 percent of bucks /86 percent of does are harvested on Trinchera Ranch

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Hunting and Angling on the Line: Transmission Policy, Siting and Sportsmen's Interest

Conservation Contributions by the Trinchera

- Large, intact landscape and habitats with intense conservation management plan
- Large game and nongame species population:
  - 3,000 elk
  - 1,500-plus mule deer
  - 400 bighorn sheep
  - Black bear, mountain lion, small game species, game birds
  - Trout including Rio Grande cutthroat trout
- 81,000-acre conservation easement with additional potential easements
- Ranching for Wildlife – private land access program (origin of program)
  - 10 bull/either sex elk tags
  - Majority of cow elk tags available to public
  - One bighorn sheep tag available to public every three years
  - Buck and doe mule deer hunting opportunities
- Local outfitting for hunting, including mountain lions
- Rio Grande cutthroat trout restoration and reintroduction
- Degraded watershed restoration efforts
- Bighorn sheep introductions and transplants
- Possible sage grouse reintroduction site
- Public firewood collection for habitat management
- Forest management plans for restoration and habitat management
- Research cooperation with the Colorado Division of Wildlife, federal agencies and universities
- Outdoor classroom activities
- Access to mountain climbers
- Cash and in-kind contributions to conservation efforts

Project Involvement by Trinchera

- Participating in the PUC CPCN process
- Provided NEPA scoping comments
- Local conservation and landowner coalition involvement
- Litigation
- Public relations

Threats to Conservation from Project

- Loss of quality conservation stewardship commitment by landowner
- Current and future conservation easements
- Public access programs – Ranching for Wildlife
- Loss of critical habitat for elk and deer
- Winter range development
- Fragmented habitats and landscape
- Watershed restoration efforts and water quality
- Continuation of research and wildlife studies
- Change in grazing management

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Wyoming – Northern Laramie Range Alliance

This case study differs from the previous two because it examines a local landowner alliance's interface with a project rather than involvement by an individual landowner.

Central Wyoming's Laramie Mountains, part of the Rocky Mountain front, rise from the high plains of eastern Wyoming. The area has a long history of agriculture and cattle ranching, and its forests provided early travelers, settlers and railroads with timber for buildings, heat and railroad ties.

The area is flush with wildlife and, with the mixed ownership of private and public lands, has become a haven for sportsmen. Elk is the primary game species, but mule deer, black bear, mountain lion and bighorn sheep also offer excellent hunting opportunities. The Wyoming Game and Fish Department, U.S. Forest Service, BLM and private landowners have successfully worked together to sustain open spaces, timber production, agriculture and grazing and fish and wildlife conservation. Many public land access points are in the area, along with both free and paid private land access. The state of Wyoming has numerous habitat and hunter management areas in the region, providing access to private lands through cooperative agreements. The area also has high potential for wind energy development. With this development comes the need for transmission.

In September 2007, Rocky Mountain Power (with Idaho Power as a cooperator) began identifying potential routes for a new transmission line stretching from the northern part of the Laramie Range to the southwest. The proposed line became the Gateway West Project, part of a regional transmission plan to increase the capacity to move electricity particularly generated from wind. The first proposed route included alternatives that cut through the heart of the Laramie Range, creating a controversy.

Many of the ranches and landowners in the Laramie Range region have been there a long time. Some ranches are considered "centennial ranches," meaning they have been in one family for more than 100 years. Wealthy and politically well-connected ranchers also live in the region. The Gateway West Project would do two things: It would create a mile-wide right of way through the Laramie Range, and it would open up many areas on the east side of the range to wind power production. In fact, part of the justification for the new line was that companies had begun acquiring rights to develop wind on private and public lands in the Laramie Range. One result of the project proposal was the formation of the Northern Laramie Range Alliance (NLRA).

The NLRA, a coalition of more than 800 landowners and other citizens, focuses on maintaining members' beloved Western lifestyles by ensuring that energy development is done responsibly. The alliance supports properly sited industrial-scale wind development and believes the best way to accomplish this is to build production on the high plains and away from settled areas and scenic, multiple-use landscapes.

Encompassing multiple central-Wyoming counties, NLRA member landholdings range into the tens of thousands of acres. This part of Wyoming is no stranger to energy development but never has faced a threat like the wind generators proposed in the Boxelder-Mormon Canyon area of the Wyoming Range and accompanying transmission lines. New roads would have to be built and maintained to support the infrastructure, and current rural, low-traffic roads would require improvement to haul equipment through the sensitive watershed and areas important to fish and wildlife. The NLRA believes the

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increased human activity and presence of large transmission towers would change forever their agricultural and outdoor heritage.

Many NLRA farms are enrolled in conservation management programs, such as the Conservation Reserve Program, Wildlife Habitat Incentives Program and Environmental Quality Incentives Program. Area ranchers are proud landowners who balance their agricultural practices with the needs of fish and wildlife, particularly big-game species. Many NLRA members offer public access to their lands, either through the Wyoming Game and Fish Private Lands-Public Wildlife Access program or through personal contact. The region is known as some of the best trophy bull elk habitat in the state; drawing either a resident or nonresident game tag requires many preference points and tremendous luck. Success rates are high for elk harvest, and NLRA members worry that the quality of hunting would be diminished with increased human activity.

Some landowners support the development of wind on their properties, and a handful of private landowners "signed on" to generate income, sparking a heated debate over the future of the Laramie Range and individual landowner's rights to use their lands as they please. Companies acquired power purchase agreements in late summer 2010 to help expedite the process and prove the need for transmission. Other NLRA members recognized the potential negative impacts to the environment but also questioned the economic impacts. Simply put, many local landowners do not support wind and transmission line development in their backyards just so that consumers outside of the region can reap the benefits.

Soon after its formation, the NLRA publicly opposed the utility companies' proposal. The alliance's first order of business was to promote relocation of a segment of the transmission line to a more appropriate area. The alliance used its considerable influence by reaching out to politicians, media outlets, and the project proponent. Their efforts were rewarded: The controversial segment was removed from consideration by the project proponents and not evaluated as a viable alternative during project development.

The NLRA's next goal was to ensure that wind power would alter neither the region's culture nor the lifestyles of its inhabitants and that current natural resources and agricultural stewardship would continue to stand as the region's primary values. The alliance has adopted public relations and legal tactics to lobby the Converse County Commission on wind power regulations generally and the Wasatch Wind project specifically. The group also has worked with state agencies on wind power guidelines and provided input to numerous NEPA projects. Newsletters, newspaper columns and participation in commission meetings have garnered support for the cause, but the fate of the mountain range rests in how wind is developed within the region.

Recently the NLRA mailed a survey to every postal address in Converse County to gather data on public acceptance of the Wasatch Wind project. Of the more than 6,200 surveys mailed, nearly 1,100 were completed and returned. Of the respondents, 69 percent opposed the wind project countywide, with nearly 75 percent opposition in the town of Glenrock, Wyo., the area that would be affected most by the project. The NLRA and its diverse steering committee intend to use this and other data in the future to continue their fight against the project's construction in the Laramie Mountains.

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Hunting and Angling on the Line: Transmission Policy, Siting and Sportsmen's Interest

The threat to the Laramie Range and foothills from wind power and transmission is still there. The stewardship the area is afforded due to successful cooperative efforts and those of large landowners has been a boom for local wildlife, water quality, and sportsmen. The success of balancing these conservation values and the development of new power resources will depend on adequately addressing the future needs of fish and wildlife stewardship provided by all stakeholders.

Northern Laramie Range Alliance: Quick Facts

- More than 800 members of a consortium for "properly sited wind development" in central Wyoming
- Mostly rural, agricultural area home to residents with intense pride in their Western heritage and who value their game and fish resources
- Threatening project: Gateway West Transmission Project
- Wind power development

Hunting and Sporting Benefits of the Area (Laramie Range Mountains and Foothills)

- Large cooperative habitat and access management agreements within a highly fragmented mixed of public and private lands
  - 9,835 acres enrolled in Wyoming Game and Fish Private Lands -- Public Wildlife Access programs
  - 125,068 acres administered as hunter management areas by the Wyoming Game and Fish Department
- Elk herd is 96 percent above population objective set by the Wyoming Game and Fish Department
- Healthy bighorn sheep, mule deer and mountain lion populations

Elk (figures are five-year averages)

- Unit 7 elk – 89 percent of entire elk analysis unit (includes adjacent Unit 19)
- 10,542 elk
- 2,876 hunters per year
- 784 bull harvest
- 1,563 total elk harvest
- 20,669 hunter days

Bighorn Sheep

- Unit 19 bighorn sheep
- Six any ram tags per year
- 89 hunter days

Indicators of Quality of the Area

- Limited-quota elk hunting (from 2009)
  - 1,276 either sex tags/4,309 resident applications (29.6-percent chance)
  - 33 Either Sex tags/1,513 nonresident applications (2.2-percent chance)
  - 51.8-percent hunter success
  - 14.5 days/harvest

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- Quality bighorn sheep hunting (from 2009)
  - 15 preference points to draw
  - 4 tags/345 resident applications (1.2-percent chance)
  - 2 tags/110 Non-resident applications (1.8-percent chance)
  - 71.43-percent harvest success
  - 17.8 days/harvest

Conservation Contributions by the NLRA

- Long-term (more than 100 years) land and habitat management focused on open space, agriculture, watershed, and wildlife benefits
- Cooperative habitat and access agreements for mix of private and public lands
- Wildlife and fisheries management focused on game species
- Limited disturbance to critical wildlife habitats and undisturbed winter ranges
- Watershed restoration actions
- Cooperative grazing management
- Conservation easements

Project Involvement by NLRA

- Grassroots development, awareness and activism
- Political activities with Wyoming elected officials
- Public relations and media
- Local legal fight with county commission

Threats to Conservation from Project

- Increase in human disturbance to fish and wildlife populations during and after construction of project
- Possibility of additional energy projects once line is completed, further diminishing habitat in area
- Loss of critical breeding habitat for elk and deer
- Restricted hunting access in some areas and increased ease of access to others
- Diminished quantity and quality of bull elk harvest
- Loss of rural ranching lifestyle and importance of hunting and fishing to overall heritage of area
- Loss of access as landowners change management philosophies
- Loss of future conservation easement opportunities and open space commitments
- Increased poaching on private lands

Discussion of Project Findings

Transmission lines eventually will snake across many of our landscapes, affecting tens of thousands of acres of high-quality fish and wildlife habitats. These lines will open up new lands or blank spots on the map for increased energy development, areas that are currently some of the best fish and wildlife habitats and destinations for sportsmen. The link between increased transmission and increased energy production, traditional or renewable, cannot be discounted in transmission planning or policy.

The future of renewable and alternative energy development is booming, with wind and solar projects attracting the lion's share of funds. Federal support has increased with commitments to investors and

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efforts to ease and streamline permitting. Concerns about climate change and energy independence are affecting future policy direction, which eventually will increase pressure for more renewable energy and transmission development. The current administration already is focusing on growing renewable energy production as a means of enhancing national security, providing jobs and reducing carbon emissions.

Industry groups are promoting renewable energy development for economic development, job creation, climate change and national security. Furthermore, government mandates for clean energy and rural America's aging power generation infrastructure are resulting in utilities vying for increased capacity of any kind. Growing pressure to move away from coal has the industry scrambling for government money and new technology.

Industrial-scale renewable energy projects will require an upgrade of existing lines, and the move toward smart grid technologies and increased capacity needs will require construction of new transmission lines to deliver energy to consumers. Wind and solar projects are being pursued in undeveloped, rural landscapes – initially in the West and now, increasingly, in the eastern United States.

Environmental groups have focused primarily on sensitive species, bats and birds, paying little attention to fish and game species. Hunters and anglers have been absent or quiet in the debate, with the majority of sportsmen's groups unaware of the potential threat to hunting and fishing opportunities. Not enough information exists about the impacts of power lines to future fish and wildlife conservation efforts on public and private lands, and projects are being rushed before their long-term effects can be identified and addressed. Conservation groups and government fish and game agencies don't have the resources to keep up with the influx of projects and are limited in their capacity to address sportsmen's issues like access and quality of experience. When stakeholder groups are convened, sportsmen groups frequently are ignored, with officials assuming, incorrectly, that other wildlife or environmental groups can adequately represent sportsmen's interests.

Private landowners and others who have raised concerns about specific projects are accused of NIMBY ("not in my backyard") attitudes and self-interest. Many private landowners are responsible stewards of fish and wildlife and have managed their lands in a conservation-focused manner. Sportsmen benefit from proper management of habitats regardless of ownership and have opportunities to access private lands through formal access programs, informal relationships, and increased quality and opportunity on adjacent public lands where game often ventures. Most landowners believe their involvement in projects comes too late in the permitting and approval process to adequately address their concerns. Future long-term commitments to private-lands conservation like easements, access agreements and proper stewardship are threatened.

Common Themes

As all three case studies illustrate, transmission lines can pose serious risks to current and future conservation management of lands and good stewardship practices. Transmission projects pursued without consideration of impacts to existing private-lands conservation programs and future commitments to conservation will result in some landowners altering their management approaches, thus negatively affecting public access to high-quality hunting and fishing opportunities. Analysis of the three case studies specifically and transmission policy in general indicates five major risk factors:

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1. ***Formal and informal conservation stewardship/easement programs***
   At risk are both current and future activities, including Farm Bill programs, state agency cooperative agreements, landowner commitments to fish and wildlife management, research programs and outdoor learning opportunities.

2. ***Public- and private-lands access programs***
   Programs threatened by changes in land use and in values and stewardship commitments by landowners include block management, Ranching for Wildlife and state-run public hunting and fishing properties.

3. ***Valuable habitat and watershed management***
   Private landowners are able to immediately implement projects beneficial to fish and wildlife, facilitating private-lands management that often is more effective than management of adjacent state or federal lands. With 67 percent of the nation and roughly half of Western lands under private ownership, the future of fish and wildlife management and hunting and fishing depends on cooperation and coordination by private landowners.

4. ***Heritages and cultures***
   Many landowners manage their properties for agriculture, open space, conservation and other quality of life values. These values and stewardship could be altered, neglected or abandoned if they are not adequately addressed in planning for transmission lines and future energy production.

5. ***High-quality public-lands hunting and fishing***
   Wildlife species, particularly big game, do not understand or respect property boundaries in the unfenced range. Animals migrate between private and public lands based on seasonal habitat needs, to reproduce, and for security. Public lands adjacent to properly managed private lands provide some of the best public-lands hunting available as reflected by high demand/low odds in drawing tags and heavy hunting pressure. Loss of conservation stewardship commitments on private lands will affect these public lands. The subsequent decline in quality will be evident immediately.

Conclusions

In addition to the five themes identified above, other conclusions can be drawn regarding the problems fish, wildlife and sportsmen face in transmission policy and siting.

1. Hunters and anglers are not adequately represented in planning and policy efforts.

2. Conservation groups do not have sufficient resources – technical, financial or human – compared to industry and government groups that support the proliferation of renewable energy and its required transmission infrastructure.

3. The current utility planning process proceeds for approximately two years before proposed routes are known by the public and potentially affected landowners and their conservation efforts are brought to the table.

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4. Peripheral and ancillary impacts associated with energy development, such as changes in land use priorities and increase residential development, are not taken into account during the transmission planning process.

5. Fish and game species and sporting recreation often are discounted or ignored in environmental or threats analyses. Birds, bats and sensitive species are the primary focus when species impacts are conducted.

Recommendations

Our research resulted in general recommendations that, if implemented, would improve transmission siting and should be incorporated into transmission policy revision and energy policy deliberation.

Increase sportsmen-stakeholder involvement earlier in the planning process.
The sooner stakeholders are involved in the project planning process, the better their concerns can be met. Fish, wildlife and sporting values demand better identification and recognition by project proponents, and the hunting and fishing community must be better represented on stakeholder advisory committees.

Use existing corridors to prevent unnecessary impacts to well-managed habitat – public or private.
The best mitigation is avoidance of impacts; therefore, existing disturbed areas or corridors should be used to the maximum extent possible. If new routes or corridors are needed, fish, wildlife and sporting values must be adequately assessed to provide a baseline for mitigation actions and sustain these values during transmission line development and operation.

Identify and utilize planned corridors for state, regional and national transmission needs.
Designated corridors are identified in planning documents but often are ignored during individual project siting processes. These designations were developed to reduce conflicts, minimize impacts and meet the needs of energy production and reliability.

Avoid or minimize fish, wildlife and recreational impacts during and after the siting process.
A "no net loss" strategy should be followed for fish, wildlife and sporting resources during project planning and implementation. Advanced technology and strategies should be adopted to minimize or avoid impacts, effective best management practices should be developed for species or habitats at risk, incentives for landowner cooperation should be promoted, and adequate compensation should be provided for habitats and properties that are negatively affected.

Incorporate the needs of fish, wildlife and sportsmen into any state or local process for permitting lines.
Representation by sportsmen and affected landowners should be required on advisory or stakeholder committees. Conservation stewardship should be considered regardless of property ownership.

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Hunting and Angling on the Line: Transmission Policy, Siting and Sportsmen's Interest

Develop a roadmap for energy production, transmission and how these activities accommodate other land uses before undertaking projects that will change the way landscapes and habitats are managed.

The link between transmission and energy production cannot be ignored during the planning process. Additional transmission lines or capacity will open new lands to energy development, particularly renewable energy development, that previously had low or no potential for production. These areas provide some of our best fish and wildlife habitat and hunting opportunities. Further, industry's analysis of need and impact must not be the sole factor in determining the future of power generation and distribution for the country; a coordinated planning process must be followed.

Develop mitigation plans for important fish and wildlife habitat that address recreational impacts and adequate fund implementation.

A rigorous, structured plan for mitigation can reduce net loss of quality and opportunity. These plans must be developed during the transmission planning process and use best available science as a guide. Cooperative agreements for work on private or state lands must be in place before project implementation so that mitigation can begin immediately. Impacts to hunting, fishing and outdoor recreation must be considered.

Identify and recognize conservation efforts on private lands and incorporate impacts to these efforts into project development.

Private landowners throughout the country have dedicated millions of acres to fish and wildlife stewardship through formal conservation easements and cooperative habitat management with other landowners. Existing and future conservation easements can be degraded or abandoned due to transmission siting on properties. These conservation efforts can be acknowledged by ensuring that potential impacts are analyzed and considered during the planning process.

Ensure a transparent process for public and stakeholder involvement.

Too often, affected stakeholders feel uninformed during transmission planning due to the projects' complexity and technology and business practices. Ensure that deliberations are understood by the public/lay person and that no negotiations that affect stakeholders are done in secret.

Develop incentives that create win-win situations for affected stakeholders and landowners.

The threat of eminent domain is real and a cause of trepidation for landowners dealing with transmission companies. A series of incentives beyond direct compensation must be developed to create situations where good conservation efforts are not abandoned in return for payments. This includes land sales, land swaps, long-term agreements, route refinement and other actions that would allow conflict resolution without condemnation of land.

The TRCP believes in and promotes responsible energy development that balances land and resource values that sustain fish and wildlife populations and maintain opportunities for hunting and fishing. Our work is guided by a team comprised of representatives of our conservation partner organizations – the TRCP Fish, Wildlife and Energy Working Group – and a staff of experienced wildlife and policy experts. By combining the science-based expertise of the FWEWG with an active network of sportsmen, the TRCP Center for Responsible Energy Development is working with hunters and anglers throughout the country

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B10	Elk Song Ranch – March 18, 2015 (cont.)

to conserve our outdoor traditions by supporting a balanced approach energy development and the management of fish and wildlife resources.

A 501c3 nonprofit corporation, the TRCP is a coalition of hunting, fishing and conservation organizations, labor unions and individuals who represent the wide spectrum of America's outdoor community. In order to guarantee all Americans quality places to hunt and fish, the TRCP strengthens laws, policies and practices affecting fish and wildlife conservation by leading partnerships that influence decision makers.

ATTACHMENT

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

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B10 **Elk Song Ranch – March 18, 2015 (cont.)**

Home I Want To... Departments Agendas and Minutes Calendar Search

- **Secondary Roads Home Page**
- Contact Information
- Adopt-A-Roadway
- Brush Control Policy
- Dust Alleviation Permit
- Embargoed Roads
- FAQ
- GPS Monuments
- Mailbox Program
- Native Plant Policy
- North Corridor Info
- Noxious & Invasive Weeds
- Roadside Vegetation Mngmt.
- Right of Way / Utility Permits
- Trails Advisory Agendas & Minutes
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- Traffic Count Maps
- Iowa Dept. of Transportation
- Iowa Road Conditions
- New-Obstructions in Right-of-Way
- Signs

- **Snow Policy**

Road Construction
- Road Construction Updates
- Road Construction Plans

ROAD CONSTRUCTION

MEHAFFEY BRIDGE PROJECT

Secondary Roads

Noxious & Invasive Weeds Of Johnson County

County Weed Commissioner
4810 Melrose Avenue West
Iowa City, IA 52246
PH: (319) 356-6046
e-mail:weedcommissioner@co.johnson.ia.us

Report Weed Infestation

Noxious Weeds Policy
Roadside Maintenance Agreement
Noxious Weeds - Why Should We Worry?
What Exactly is a Noxious Weed?
Why Should I Control Noxious Weeds?
Noxious & Invasive Weed Species
What Can You Do To Help?
Who Controls Noxious Weeds in Johnson County?
How Do I Contact The County Weed Commissioner?
Code of Iowa, Chapter 317 Weeds
Noxious Weeds Resolution
Integrated Roadside Vegetation Management Plan
Related Websites

Noxious Weeds - Why Should We Worry?

Should we worry whether the plants growing around us are native to our area or not? Isn't it all just "nature?" Before you dismiss this issue as unimportant, consider the following:

- Noxious and invasive weeds in agricultural and natural areas cost our country $13 Billion dollars per year

- Noxious and invasive weeds are the second most important reason for the loss of biological diversity, after habitat destruction

- The Bureau of Land Management, our nation's largest public landowner, estimates that 2,300 acres per day of its land are being lost to noxious and invasive plants. Nearly 4,000 acres per day are estimated to be lost to weeds nationwide.

If you find yourself alarmed by these facts, you are not alone. Local and state agencies, groups, and individuals have been quietly pouring money and resources for years into our local roadsides, parks, natural areas, and agricultural areas to combat this pressing problem. This web site is dedicated to raising public awareness of this issue. The battle against noxious and invasive weeds cannot be won without public awareness and support. As a homeowner, landowner, or land manager, your actions have a direct effect on this problem, because many weeds escape from yards and gardens.

This web site has, in addition, been prepared to help you understand the problems of noxious and invasive weeds, identify them around your home and community, and take direct action to save our natural and agricultural resources from this threat.

What Exactly is a Noxious Weed?

Many people are familiar with the concept of weeds in the context of their yard or garden. Weeds are simply undesirable plant species. The same principle holds true for Johnson County's roadsides, natural areas, farm fields, etc., which are home to a diverse array of native plants. The number and variety of these native species is described by the term "biological diversity." Over the past 150 years, many non-native plants have been introduced

ATTACHMENT

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

to our region, both intentionally and accidentally. The vast majority of these plants coexist with native species, and are ecologically harmless.

What makes a plant noxious in the context of Johnson County's natural resources, is its negative impact on agriculture, or its ability to spread and crowd out native plants. This is why noxious weeds are distinguished from those weeds that occur in small numbers and are innocuous. Noxious weeds are those able to reproduce in the wild, spread rapidly, which are difficult to control, or which cause the decline or loss of our native plants. It is not completely understood why some weeds become noxious and some don't. But because noxious weeds did not evolve locally, their populations are not held in check by natural predators or diseases, giving them a competitive edge over native plants. Noxious weed species can proliferate and spread over large areas. Some are able to completely displace other vegetation, forming a homogenous (single species) cover. Contrast this situation with the rich variety and diversity of a native plant community such as is seen in prairies, wetlands, or forests.

Noxious weeds are exotic plants that have reached Johnson County and Iowa by escaping from gardens, being transported by hay or straw, air, dirt, tires, clothing, etc. They grow aggressively, lack natural enemies, and resist management methods. These species can move quickly into bare areas which have been disturbed by construction or erosion, have poor vegetative cover, or have other soil disturbances. Some of Iowa's noxious weeds are spread by wind blown seed, birds, or other organisms. Other weeds spread though poorly timed mowing, or baling of hay to be fed to livestock or sold. And other noxious weeds spread by sending rhizomes (long underground roots) to uninfested areas. Most of Iowa's noxious weeds can be easily controlled through proper management. Use of mowing, cutting, burning, competitive seeding, cultivation, herbicide usage, etc., are some of the various techniques used to combat weeds. Several of the State of Iowa and Johnson County's worst noxious weeds are very difficult to control, such as Canada Thistle, Japanese Knotweed, or Purple Loosestrife. A primary key to weed control is early detection and management, before that weed has spread and built up a large seed bank and energy reserve.

Why Should I Control Noxious Weeds?

Noxious Weeds and other invasive species threaten all of our natural resources. They can destroy native plant and animal habitat, damage recreational areas, clog waterways, lower land values, decrease agricultural crop yields, and some can even poison humans and livestock. Noxious Weeds are also a leading cause of species endangerment under the Endangered Species Act. The Iowa Dept. of Agriculture & Land Stewardship, along with Johnson County, has declared 31 species of plants as Noxious. A complete list of plants considered noxious by Johnson County or the State of Iowa is included with this web site.

Who Controls Noxious Weeds in Johnson County?

All landowners are required to control noxious weeds on their property to eliminate seed production. Weeds growing within city limits, in abandoned cemeteries, along railroads, streets, and highways, as well as on farmland, or any private or public land, must be controlled. The Johnson County Weed Commissioner enforces the Iowa Noxious Weed Law (Chapter 317). To learn more about Iowa's Weed Law, click here.

How Do I Contact The County Weed Commissioner?

Every county in Iowa has a weed commissioner to oversee that County's noxious weed control program. The Johnson County Weed Commissioner is located at the Secondary Road Dept., 4810 Melrose Ave, Iowa City, IA 52246. Phone (319) 356-6046.

What Can You Do To Help?

Don't Plant Invasive Weeds. Be selective when you choose plants for home landscaping. Some invasive plants, such as purple loosestrife varieties, are still sold in nurseries and garden shops, so beware! If you plant these in your yard, they may escape into nearby natural areas and become a problem by displacing native species. Not all non-native plants are invasive. There are many beautiful horticultural plants available for you to choose from, without contributing to the noxious or invasive weed problem. Also consider planting native species in your home garden. Natives offer a good choice for home landscaping because they are well adapted to local conditions and often thrive with less care than required by many non-native plants. Native plant gardening also enhances the value of your yard for local wildlife including birds and butterflies.

Remove Invasive Weeds. Be on the lookout for noxious or invasive weeds and remove or report them whenever possible. You may have invasive plants already growing in your backyard. Birds and other animals may eat the seeds of these plants and then travel to nearby uninfested lands, resulting in the spread of noxious weeds. You can help stop these invasions by removing the source plants. Talk to your neighbors about the problem and share your concerns. Report sightings on public lands to the land manager. And if you do remove these plants from your own land, be sure not to spread the seeds when disposing of them.

ATTACHMENT

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

Help Prevent the Accidental Spread of Noxious Weeds. When you venture into natural areas, roadsides, or any place with noxious weeds, be aware that you could be introducing or carrying invasive weeds inadvertently. Check your shoes, socks, clothing, etc., which might carry seeds. Another important thing you can do is to try to limit soil disturbances, if possible, on your property. Noxious weeds thrive on disturbance and can quickly colonize areas which don't have a good vegetative cover. If noxious weeds are moving in, try to control them before they get well established and the area is infested.

Educate Yourself And Spread The Word. Become better informed about how to identify noxious and invasive weeds, how to avoid spreading them, and how to control them. The battle to control noxious weeds cannot be won without public awareness and support. Then share what you have learned so that others can join in the WAR ON WEEDS!

Here are some groups and agencies that can provide further information or assistance on noxious weeds:
- Johnson County Roadside Vegetation Manager/ Weed Commissioner (319) 356-6046
- Johnson County Extension Service (319) 337-2145
- Iowa Department of Agriculture & Land Stewardship (515) 281-5321
- Natural Resource Conservation Service (319) 337-2322
- Iowa Department of Transportation (515) 233-7729
- Iowa State University (Agronomy) (515) 294-1923
- The Nature Conservancy (515) 244-5044

Related Websites

- Invasivespecies.gov: The Nation's Invasive Species Information System
- Bureau of Land Management Environmental Education Homepage
- Bureau of Land Management Weeds Website
- University of Northern Iowa Roadside Program
- Iowa's Living Roadway Trustfund

HIPAA Privacy Practices • Any questions regarding this site can be addressed to Web Master • Download Adobe Reader here • Freedom of Information Requests

Sending an Encrypted e-mail to a Johnson County Employee

If you experience problems finding the information you need, please let us know here.

ATTACHMENT

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

Danner SINCE 1932

July 9, 2014

Dear Brad Allen,

I write to thank you for granting us access to Elk Song Ranch to capture footage for our latest hunting television commercial. As you know, your property was greatly desired by us due to its unspoiled vistas overlooking pristine creeks, rocky ridges, and lush fields. However, one of the most awe-inspiring features of your ranch was the magnificent herd of elk on your property - a herd in proportion of which we have rarely witnessed. It is no doubt that Elk Song Ranch is a treasured and unique property, as our location scouts searched across the entire western United States looking for a comparable property only to confirm that it's beauty, diversity, and elk habitat was unmatched.

As a brand rooted in tradition and conservation, we align ourselves with partners such as The Rocky Mountain Elk Foundation that serve to protect elk and their habitat from the continued pressures of the growing west. It is refreshing to witness people like you and your family that understand the importance of preserving vital landscapes such as Elk Song Ranch. It is truly a unique property that provides significant habitat to this special and sensitive species.

We greatly appreciate your generosity and admire for your commitment to keep your land wild and unspoiled. We wish you the best and hope that the imagery captured on Elk Song Ranch will inspire others to do what they can to protect important habitat, of which there is increasing pressures to develop and alter.

Sincerely,

Laurie Thomas
Director of Marketing
LaCrosse Footwear, Inc.

Kirk Layton
VP Finance & Administration
LaCrosse Footwear, Inc.

ATTACHMENT

B10	Elk Song Ranch – March 18, 2015 (cont.)

Oregon's Statewide Planning Goals & Guidelines

GOAL 4: FOREST LANDS

OAR 660-015-0000(4)

To conserve forest lands by maintaining the forest land base and to protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture.

Forest lands are those lands acknowledged as forest lands as of the date of adoption of this goal amendment. Where a plan is not acknowledged or a plan amendment involving forest lands is proposed, forest land shall include lands which are suitable for commercial forest uses including adjacent or nearby lands which are necessary to permit forest operations or practices and other forested lands that maintain soil, air, water and fish and wildlife resources.

USES

Forest operations, practices and auxiliary uses shall be allowed on forest lands subject only to such regulation of uses as are found in ORS 527.722.

Uses which may be allowed subject to standards set forth in this goal and administrative rule are: (1) uses related to and in support of forest operations; (2) uses to conserve soil, water and air quality, and to provide for fish and wildlife resources, agriculture and recreational opportunities appropriate in a forest environment; (3) locationally dependent uses; (4) dwellings authorized by law.

IMPLEMENTATION

Comprehensive plans and zoning provide certainty to assure that forest lands will be available now and in the future for the growing and harvesting of trees. Local governments shall inventory, designate and zone forest lands. Local governments shall adopt zones which contain provisions to address the uses allowed by the goal and administrative rule and apply those zones to designated forest lands.

Zoning applied to forest land shall contain provisions which limit, to the extent permitted by ORS 527.722, uses which can have significant adverse effects on forest land, operations or practices. Such zones shall contain numeric standards for land divisions and standards for the review and siting of land uses. Such land divisions and siting standards shall be consistent with the applicable statutes, goal and administrative rule. If a county proposes a minimum lot or parcel size less than 80 acres, the minimum shall meet the requirements of ORS 527.630 and conserve values found on forest lands. Siting standards shall be designed to make allowed uses compatible with forest operations, agriculture and to conserve values found on forest lands.

Local governments authorized by ORS 215.316 may inventory, designate

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ATTACHMENT

B10 | **Elk Song Ranch – March 18, 2015 (cont.)**

and zone forest lands as marginal land, and may adopt a zone which contains provisions for those uses and land divisions authorized by law.

GUIDELINES

A. PLANNING

1. Forest lands should be inventoried so as to provide for the preservation of such lands for forest uses.
2. Plans providing for the preservation of forest lands for forest uses should consider as a major determinant the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources.

B. IMPLEMENTATION

1. Before forest land is changed to another use, the productive capacity of the land in each use should be considered and evaluated.
2. Developments that are allowable under the forest lands classification should be limited to those activities for forest production and protection and other land management uses that are compatible with forest production. Forest lands should be available for recreation and other uses that do not hinder growth.
3. Forestation or reforestation should be encouraged on land suitable for such purposes, including marginal agricultural land not needed for farm use.
4. Road standards should be limited to the minimum width necessary for management and safety.
5. Highways through forest lands should be designed to minimize impact on such lands.
6. Rights-of-way should be designed so as not to preclude forest growth whenever possible.
7. Maximum utilization of utility rights-of-way should be required before permitting new ones.
8. Comprehensive plans should consider other land uses that are adjacent to forest lands so that conflicts with forest harvest and management are avoided.

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ATTACHMENT

B10 **Elk Song Ranch – March 18, 2015 (cont.)**

COMMENT(S)

RESPONSE(S)

B11 Elk Song Ranch – March 19, 2015

From: EnviroLytical - B2H <info@envirolytical.com>
Sent: Thursday, March 19, 2015 1:51 PM
To: comment@boardmantohemingway.com
Subject: New Communication: Please consider these comments in addition to those hand delivered to the BLM office on March 18 to Vail Oregon. Myself and others have been very concerned about the process used in citing

Flag Status: Flagged

Brad Allen <bradallen4030@hotmail.com>
https://el2.envirolytical.com/communication/view/103311
Please consider these comments in addition to those hand delivered to the BLM office on March 18 to Vail Oregon.

B11a Myself and others have been very concerned about the process used in citing the route.I was informed today that land owned by Idaho power company for mitigation purposes near Richland Oregon,containing sage grouse was side skirted moving the line to private lands with possibly more sage grouse and better habitat.Private landowners in this area are older people who may not understand the impacts.
I have heard numerous stories of routes being changed because of particular landowner resistance.Idaho power company has put neighbors at odds with each other, and followed routes of least public resistance.these routes do not necessarily reflect good reasoning.For example,The proposed route over glass Hill,was to pass through Forest land owned by Eastern Oregon University and a couple other neighboring properties of mine.Because EOU and a couple other neighboring properties did not want the transmission line.The route was changed as to not impact these properties, just placing the burden on other properties with the same impacts.Since I confronted EOU property land manager, asking why her property deserves a preference over others, We now have been put at odds with each other.She no longer speaks to me.
Property owners along the routes have not been treated justly.Winners and losers have been picked all along the way.For example, Idaho power avoiding their own land, Forest service land being avoided,lands owned by EOU being avoided, lands owned by Oregon Department of Fish and wildlife being avoided,and then sticking it on private land owners.Me being one of them.
The route has done nothing more than follow a path of perceived least resistance.Standards for citing the transmission line have varied from place to place.For example, separation criteria for existing transmission lines in Baker County is not the same as the criteria used in Union County.In a letter from Idaho power company to me, project manager Todd Adams, exclaimed the same methodology for citing the line was used along the entire route.This does not appear to be the case.

B11b There is a lot of question in our communities as to the need for this transmission line being built at all.Any information that I could gather concluded that Oregons Energy supply is adequate. We produce excess energy in this state.I do not believe it is legal to use eminent domain in Oregon to Ship power outside of this state.
Land should not be condemned in Oregon to sell power to other states.
I understand Oregon PUC has acknowledged the need for the transmission line.However,there should be more clarification so private landowners, and stakeholders,can better assess the actual need of electricity in this state.The desire to connect the transmission of power from state to state, does not necessarily establish a need in Oregon.It is wrong, and illegal to condemn Oregon private land to ship power outside the state.
Thank you for considering these additional comments that were submitted March 18 to the Vail BLM office.

Owner of Elk Song Ranch
Brad Allen

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B11a Analysis has been expanded to include alternative route variations with careful consideration of colocation with existing facilities (utilities and transportation). See Section 2.1.1.3 (Recommended Route-Variation Options) for further detail.

B11b The Applicant's 2015 Integrated Resource Plan (IRP), a long-term resource planning study, recently reaffirmed that the B2H Project is essential to serving future growth in customer demand. Previous IRPs also identified the need for this transmission line project, going back to the 2006 IRP. The 2015 IRP indicates the need of the B2H Project remains strong. When finished, the B2H Project would help provide low-cost energy to the Applicant's customers in southern Idaho and eastern Oregon. The B2H Project also will interconnect with existing transmission systems owned by B2H Project partners PacifiCorp and the Bonneville Power Administration, allowing greater amounts of electricity to move throughout the Pacific Northwest. This helps meet a regional need and provides benefits to the entire area, much of which is served, directly or indirectly, by those two providers. In addition, the B2H Project allows the Applicant to serve its growing load without building carbon-emitting resource.

COMMENT(S) | **RESPONSE(S)**

B12 **Fall River Rural Electric Cooperative – January 12, 2015**

B2H Transmission Line Project
Boardman to Hemingway

COMMENT FORM

Date: Jan 12, 2015
First Name: Bryan Last Name: Case
Organization or Affiliation (if any): Fall River Rural Electric Cooperative
Address: 1924 E 200 N
City: Rexburg State: ID Zip: 83440
E-mail address: bryan.case@fallriverelectric.com Phone: 208-709-1263

Privacy Statement: *Before including your address, phone number, e-mail address or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold identifying information, we cannot guarantee that we will be able to do so.*

☐ Please check here if you wish your personal information to remain confidential.

Comments must be submitted by March 19, 2015.

My comments on the Boardman to Hemingway Transmission Line Project are:

B12a I represent Fall River Electric Cooperative a non-profit electric utility. We are BPA customers and due to the termination of the Southeast Idaho exchange agreement by PAC, we are in desperate need of transmission to have access to BPA power. We serve 16,000 meters in Idaho, Montana, and Wyoming. This transmission Coorridor is essential to bring renewable hydro energy to idaho. If we dont ~~build~~ build this link our energy needs will likely be provided using Carbon based generation.

BPA has evaluated multiple alternatives and this Boardman to Hemmingway is the least cost option.

We fully support the building of this line and hope it is built expeditiously.

Bryan Case

Boardman to Hemingway Transmission Line Project | P.O. Box 655, Vale, OR 97918

B12a Comment noted.

COMMENT(S)

RESPONSE(S)

B13 Fall River Rural Electric Cooperative – January 13, 2015

comment@boardmantohemingway.com

From: EnviroLytical - B2H <info@envirolytical.com>
Sent: Tuesday, January 13, 2015 10:19 AM
To: comment@boardmantohemingway.com
Subject: 4487: New Communication: Boardman to Hemingway January 13, 2015 Transmission Line Project PO Box 655 Vale, OR 97918 Fall River Rural Ele

Flag Status: Flagged

Bryan Case <bryan.case@fallriverelectric.com>
https://el2.envirolytical.com/communication/view/96918
Boardman to Hemingway January 13, 2015 Transmission Line Project PO Box 655 Vale, OR 97918

B13a Fall River Rural Electric Cooperative is a nonprofit entity serving Southeast Idaho, Montana, and Wyoming. Our utility serves 16,000 meters and the Boardman to Hemmingway (B2H) transmission line is essential to serving these members and we have an urgent need for it and are fully supportive of the line being built.

Fall River purchases over 95% of our power from BPA and having access to clean renewable hydro power. Historically, BPA and PacifiCorp participated in an agreement called the Southeast Idaho Exchange which was a very cost effective way for both BPA and PacifiCorp to serve their native loads using this agreement. PacifiCorp, under the terms of the agreement, unilaterally terminated the agreement with a 5 year notification which will occur on July 2016. The clock is ticking and BPA under contractual agreements with Fall River and several other public utilities is in need of securing a transmission pathway to serve these native loads. BPA has explored many options including new generation, new transmission lines, using existing transmission lines and based on their review the B2H line is the least cost option for providing transmission to meet its contractual obligation.

Here are some points in support of the B2H transmission line:

1. The need for B2H is urgent. BPA will incur higher costs to provide transmission services to its preference loads in Southern Idaho until the B2H line is completed.

2. Getting federal power to BPAs Idaho preference loads also gives those loads access to clean hydro power. Without B2H, these loads are more likely to be served by new or existing carbon resources such as coal.

3. It also allows you access to the robust power market, including renewable resources, from the heart of the Northwest energy system.

4. Fall River strongly urges BLM, Oregon EPA, and other impacted agencies to expedite its approval of the requested rights of way and issuance of the Final ROD so that B2H can proceed to construction and use as quickly as possible.

5. BLM developed the Longhorn Variation alternative to specifically address concerns raised by the Navy about encroachment into military airspace, to minimize effects on irrigated agriculture in the area, and to align with an existing transmission corridor. (Draft EIS page 2-54) The Longhorn Variation alternative for the Boardman terminus is the BLM preferred option. It is preferred by BLM over the other options because, according to the Draft EIS, it has fewer impacts on irrigated agriculture, vegetation, and streams and has acceptable impacts for the Navy regarding their bombing range. Although we may not agree with this assessment, we still favor this alternative.

6. We support the Longhorn Variation alternative because it allows BPA a direct connection to the B2H line, which is important in serving your loads at the lowest cost. Terminating at a PGE substation (Grassland) would add a PGE rate

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B13a Comment noted.

COMMENT(S)

RESPONSE(S)

B13 Fall River Rural Electric Cooperative – January 13, 2015 (cont.)

pancake and require BPA to build an additional transmission line that would add more costs and complicate the transfer of power to your loads. Also, the B2H owners should, with the local utility, optimize use of new and existing right of way to minimize impacts on land owners in the area.

In conclusion, Fall River is supportive of obtaining the approvals needed to build the B2H transmission line and have some urgency to get the approvals done so the line can be built. If you have questions or need additional information, please let me know.

Sincerely,
Bryan Case
General Manager/CEO
Fall River Rural Electric Cooperative

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COMMENT(S)

RESPONSE(S)

B14 **Gladstone Land Corporation**

GLADSTONE LAND

March 18, 2015

RECEIVED

MAR 19 2015

B.L.M. VALE DISTRICT

Ms. Tamara Gertsch
BLM National Project Manager
Bureau of Land Management
100 Oregon Street
Vale, OR 97918
tgertsch@blm.gov

RE: Boardman to Hemingway ("B2H") Transmission Line Project ("B2H Project") - Comments on the DEIS- Condemnation of Oregon Farmland

Dear Ms. Gertsch,

Gladstone Land Corporation ("Gladstone") is a publicly traded farmland real estate investment trust (Nasdaq: LAND) that owns and leases out $213 million of cropland across the United States and has more than 3,600 owners comprised of pension funds, mutual funds, individual investors and other owners. We are a major supporter of family farms and agriculture preservation through sale-leasebacks and an ongoing commitment of farm capital to local farm operators. One of our farms, owned by the Gladstone subsidiary Oregon Trail Highway, LLC, is located in Boardman, Oregon (the "Boardman Farm"). The Boardman Farm is approximately 1,900 acres and is farmed through a long-term relationship with Hale Farms, a locally based family-run farming operation, headquartered in Echo, Oregon, that grows fresh vegetables. The majority of the Boardman Farm is under threat of condemnation from both the Longhorn Variation (Bombing Range Road) and Longhorn Alternative transmission line routes under consideration in connection with the B2H Project.

In light of the extremely adverse circumstances related to the Boardman Farm and other Oregon farmland being considered in connection with the B2H Project, Gladstone respectfully submits the following comments:

1) **The original, Southerly Route to the Slatt substation should be the only route considered for the B2H Project and the Longhorn Variation should be removed from consideration.** The original proposed Southerly Route was wisely chosen by Idaho power because of its minimal impact on Oregon farmland and was conveyed to the local community as the preferred route from 2010 until late 2014. The last second deviation to the Bombing Range Road route is a surprising and concerning development for several reasons, outlined below.

COMMENT(S)

B14 **Gladstone Land Corporation (cont.)**

GLADSTONE LAND

B14a

- The Slatt substation is already built and suitable for wind farms. The Longhorn substation to the north has yet to be built and will meet strong resistance from the local community.
- The Southerly route to Slatt has minimal impact on the local agricultural community. That route will be met with little public, environmental and political resistance.
- The Longhorn Routes condemns prime farmland and will be much more expensive than the Southerly Route. Irrigation pivots cannot be used near the transmission lines, and once a crop circle is shortened, the entire farm is compromised. In connection with a condemnation action, each pivot circle area impacted would need to be purchased in its entirety from the property owner.
- Southerly Route prevents environmental and federal issues. Idaho Power's newly favored Bombing Range Road route will result in a negative impact on an endangered species that has been documented previously.

B14b

2) **Due to lack of proper notification and insufficient time, the DEIS comment period should be extended by 60 days.** Gladstone acquired the 1,900 acre Boardman Farm in December of 2013, but it has not received a single notice from Idaho Power or any of the entities involved with the B2H Project. We were first made aware of the possible negative impacts the Boardman Farm in late February 2015, giving Gladstone and its more than 3,600 owners less than a month to familiarize ourselves with this project and submit comments. Another 60 days is a very reasonable request given the size and scope of the consequences of this transmission line. Additional time to submit comments will allow Gladstone, as well as other interested and impacted parties, to further assess the facts and circumstances surrounding the B2H Project and provide relevant input into the determinations involved in the B2H Project.

We appreciate your consideration of Gladstone's comments set forth above, to extending the DEIS comment period through May 18, 2015 and hopefully, your thoughtful consideration of the southerly route to the Slatt substation as the best route.

Sincerely,

[Signatures on following page]

RESPONSE(S)

B14a The analysis in the Final EIS of impacts on agriculture for all alternative routes includes a comparative quantitative analysis of important farmland, high-value farmland, irrigated farmland, and existing agriculture. The Applicant has indicated that pivots function normally near transmission lines, provided transmission line tower structures are not placed within pivot operational paths. Refer to Section 3.2.7.6 for further discussion.

B14b The minimum comment period is 60 days; an additional 30 days was provided. Also, Draft EIS public meetings were held. Please refer to Section 4.3 for a discussion of the public participation process.

COMMENT(S) | **RESPONSE(S)**

B14 **Gladstone Land Corporation (cont.)**

GLADSTONE LAND

David Gladstone, CEO
Gladstone Land Corporation

cc: Gregory Walden, Oregon Representative
U.S. House of Representatives

Robert P, McDaniel, Jr.
Bass, Berry & Sims PLC

G. Scott Thomas
Bass, Berry & Sims PLC

John W. Dawson IV
Bass, Berry & Sims PLC

Craig Reeder
Hale Companies

14058472.2

COMMENT(S)

RESPONSE(S)

B15 **GreenWood Resources, Inc.**

comment@boardmantohemingway.com

From: Gertsch, Tamara <tgertsch@blm.gov>
Sent: Thursday, March 19, 2015 10:55 AM
To: Ray Outlaw
Subject: Fwd: FW: B2H DEIS Comments - Boardman Tree Farm
Attachments: B2H DEIS Comments 3-19-2015.doc

fyi . .

Tamara Gertsch
BLM National Project Manager
5353 Yellowstone Road
Cheyenne, WY 82009
307-775-6115
307-287-3656 (cell)
tgertsch@blm.gov

'Serenity Now!' – Frank Costanza, *Seinfeld*, 1997

'Serenity now, insanity later' – Lloyd Braun, *Seinfeld*, 1997

---------- Forwarded message ----------
From: **Don Rice** <Don.Rice@gwrglobal.com>
Date: Thu, Mar 19, 2015 at 10:45 AM
Subject: FW: B2H DEIS Comments - Boardman Tree Farm
To: "tgertsch@blm.gov" <tgertsch@blm.gov>

My comments to the following address are being rejected. Please see that they are recorded.

Other ways to provide comments and/or ask questions include:

E-mail: comment@boardmantohemingway.com
U.S. Mail: **Boardman to Hemingway Transmission Line Project**
PO Box 655
Vale, OR 97918

comment@boardmantohemmingway.com (comment@boardmantohemmingway.com)
A problem occurred and this message couldn't be delivered. Check to be sure the e-mail address is correct.

1

COMMENT(S) | **RESPONSE(S)**

B15 **GreenWood Resources, Inc. (cont.)**

Don Rice

Director, North American Operations

GreenWood Resources

77200 Poleline Road

Boardman, OR 97818

541-667-9220 Office

From: Don Rice
Sent: Thursday, March 19, 2015 9:37 AM
To: 'comment@boardmantohemmingway.com'
Subject: B2H DEIS Comments - Boardman Tree Farm

Please accept these comments.

Don Rice

Director, North American Operations

GreenWood Resources

77200 Poleline Road

Boardman, OR 97818

541-667-9220 Office

2

COMMENT(S)

RESPONSE(S)

B15 **GreenWood Resources, Inc. (cont.)**

GREENWOOD RESOURCES

P.O. Box 870
Hermiston, Oregon
Telephone: 541-667-9220
Fax: 541-481-2518

March 19, 2015

Ms. Tamara Gertsch
BLM National Project Manager
Bureau of Land Management
100 Oregon Street
Vale, OR 97918
tgertsch@blm.gov

RE: Boardman to Hemingway ("B2H") Transmission Line Project ("B2H Project") - Comments on the DEIS- Destruction of Oregon Farmland

B15a I write to submit comments in regards to the B2H Project and in opposition to the Agency Preferred Alternative (i.e. Longhorn Variation) and the Longhorn Alternative. I submit these comments for the Boardman Tree Farm. Our farm would be permanently directly and negatively impacted by the Longhorn Alternatives. In light of deficiencies in the EIS process; adverse effects of the project on unique, irrigated farmland; and the Bureau of Land Management's (BLM's) failure to consider routing alternatives that would largely avoid impacting high-value irrigated farmland, The Boardman Tree Farm respectfully submits the following comments:

1) **The DEIS Drastically Underestimates the Effects of the B2H Project on Surrounding Agricultural Land**

B15b The DEIS is incorrect about the impact of the B2H Project on prime, irrigated farmland and appears to gloss over the dire economic losses on local farmers. The DEIS contains numerous inconsistencies regarding affected agricultural land and requires clarification. *See, e.g.,* DEIS § 3.2.6.6 at 3-438, *ll*. 29-30.
The DEIS improperly characterizes these economic impacts as "low". *See* DEIS § 3.2.6.6 at 3-439, *ll*. 11-13. A transmission line through the tree farm would permanently prevent the growing of trees in the easement area.

B15c The DEIS is also misleading because it claims that the Longhorn Variation and Longhorn Alternative will impact less prime farmland than the Proposed Action. This is inaccurate because the DEIS's acreage figures mistakenly focus on so-called "prime" farmland that theoretically *could* be farmed rather than actual irrigated farmland that is currently in use. BLM's reliance on theoretical farmland suggests a mistaken belief that irrigated farmland can simply be replaced. However, this is not the case, as irrigated farming is highly dependent on

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B15a Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

A comparison of alternatives has been added for impacts to agriculture for all alternatives including a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. See Section 3.2.7 for revisions.

B15b The analysis of impacts on agriculture in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture, including tree farms. Refer to Section 3.2.7.6 for further discussion.

The economic analysis in 3.2.17 has been updated to further assess how impacts to agricultural land uses may affect production and economic conditions.

B15c The analysis of impacts on agriculture in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture, including tree farms. Refer to Section 3.2.7.6 for further discussion.

COMMENT(S)

RESPONSE(S)

B15 **GreenWood Resources, Inc. (cont.)**

Page 2 of 3

B15c

soils, geography, water deliver, and irrigation conditions – lost farmland cannot merely be moved to or recovered in other locales. Indeed, the Longhorn Variation and Longhorn Alternative will impose greater harm on irrigated farming than any of the other alternatives.

2) The DEIS' Cumulative Impact Analysis is Deficient

B15d

As BLM is aware, activity for wind and other energy projects in Morrow and nearby counties remains high. The proposed location of the Longhorn substation results in projects like B2H presenting a continuing threat to surrounding farmland because it creates a need for transmission line corridors straight through productive irrigated farmland. There is a high likelihood that this corridor will continue to expand and in turn consume additional farmland to meet increasing demands for transmission capacity.

In light of the above, the DEIS's cumulative impact analysis is deficient because it fails to address the cumulative impact of the B2H Project when considered in conjunction with the various wind energy projects proposed in the region. For instance, the DEIS omits discussion of the proposed 500 MW Wheatridge Wind Energy Facility, which has provided notice that it may connect to the grid through the Longhorn Variation corridor. The Wheatridge project should have been included and was inexplicably absent from the DEIS. Moreover, we understand that additional energy projects, including Perennial Windchaser and Ella Butte, could potentially utilize the transmission corridor created by the Longhorn Variation based on their location. Together, these projects generate an influx of power and create a risk of further cumulative impacts to irrigated farmland along the transmission corridor. We urge BLM to consider these impacts in detail and carefully weigh the severe effects on nearby farmland in light of other feasible routes such as the Slatt Alternative as described below.

3) The Original, Southerly Route or the Slatt Alternative Should Be Considered for the B2H Project and the Longhorn Variation and Longhorn Alternative Should Be Removed from Consideration.

The original Proposed Action, the Southerly Route, was wisely chosen by Idaho Power because of its minimal impact on Oregon farmland and was presented to the local community as the preferred route from 2010 through 2014. Similar to the Southerly Route is the Slatt Alternative, which would follow the Southerly Route before turning west and terminating at the existing Slatt substation, which is the major 500-kV interconnection hub serving the northeastern Oregon Region.

- The Slatt substation is already built. The Longhorn substation to the north has yet to be built.
- The Southerly Slatt Alternative have minimal impact on the local agricultural community.
- The Longhorn Routes condemn prime farmland and will be much more expensive than the Southerly Slatt Alternative.

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B15d

A discussion of this potential effect has been added to Types of Potential Effects in Sections 3.2.7 and 3.3.3.7. Also, the Applicant has proposed an additional action to construct a 230-kV transmission line along Bombing Range Road for the potential wind farms (including those you have mentioned) that may in the future need to tie in to the grid. This 230-kV is discussed for each resource, including irrigated agriculture, under the Applicant's Proposed Action and is referred to as Additional Action – 69-Kilovolt Line Replacement Options 1, 2, and 3.

COMMENT(S)

RESPONSE(S)

B15 **GreenWood Resources, Inc. (cont.)**

Page 3 of 3

- The Southerly Slatt Alternative would prevent environmental and federal issues.

I welcome any opportunity to discuss our comments with you – please feel welcome to contact me with any questions you may have.

Best Regards,

GREENWOOD RESOURCES, INC.

Don Rice

Don Rice
Director North American Operations

*A Resource That Lasts Forever*TM

COMMENT(S)

RESPONSE(S)

B16 **Hale Companies**

comment@boardmantohemingway.com

From: Craig Reeder <creeder@hale-co.com>
Sent: Thursday, March 19, 2015 10:13 AM
To: tgertsch@blm.gov; comment@boardmantohemingway.com
Subject: Boardman to Hemmingway DEIS Comments
Attachments: Hale Farms B2H Comments.pdf

Ms. Gertsch:

Attached please find comments from Hale Farms regarding the Draft EIS for the Idaho Power Boardman to Hemingway Project.

If you need additional information or have question, my contact information is provided below.

Thank you,

Craig Reeder
Hale Companies
Office: 541-376-5055
Cellular: 541-571-8630
creeder@hale-co.com
Growing Food To Feed People
www.hale-co.com

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COMMENT(S)

B16 **Hale Companies (cont.)**

HALE COMPANIES

73120 Hwy 207
Echo, Oregon 97826

541-376-5055
fax 541-376-5057
www.hale-co.com

March 18, 201

Ms. Tamara Gertsch
BLM National Project Manager
Bureau of Land Management
100 Oregon Street
Vale, OR 97918
tgertsch@blm.gov

RE: Boardman to Hemingway ("B2H") Transmission Line Project ("B2H Project") - Comments on the DEIS- Destruction of Oregon Farmland

B16a We write to submit our comments in regards to the B2H Project and in opposition to the Agency Preferred Alternative (i.e. Longhorn Variation) and the Longhorn Alternative. Hale Farms owns and leases land on and near Bombing Range Road. We operate a nearly 4 mile border with Bombing Range Road (on the east side of the road) that includes 7 pivot irrigated fields and farmable "corners" that would be severely impacted by the proposed routes and cumulative impacts of the multiple proposed projects. In light of glaring deficiencies in the EIS process; adverse effects of the project on unique, unreplaceable, irrigated farmland; and the Bureau of Land Management's (BLM's) failure to consider routing alternatives that would largely avoid impacting high-value irrigated farmland, Hale Farms respectfully submits the following comments:

1) **Due to Lack of Proper Notification and Insufficient Time, the DEIS Comment Period Should Be Extended by 60 Days**

The current Agency Preferred Alternative (the Longhorn Variation) was eliminated from consideration in June 2010. Although we and other local landowners remained active in the B2H Project's scoping and commenting period, we were not made aware of the Longhorn Variation and possible negative impacts on [Name of Farm or Land] until this year, giving us very little time to familiarize ourselves with this project and submit comments.

In light of BLM's eleventh-hour selection of the Longhorn Variation as the Preferred Alternative, local landowners who have been involved with this process for years are scrambling to meet the March 19th deadline. Because 90 days is an unreasonable time to review, understand, and react to the drastic route changes the B2H Project continues to make, a 60-day extension on the comment period is a reasonable request given the size and scope of the consequences of this transmission line. Additional time to submit comments will allow Hale Farms, as well as other interested and impacted parties, to further assess the facts and circumstances surrounding the B2H Project and provide relevant input into the determinations involved in the B2H Project.

"Growing Food To Feed People"

RESPONSE(S)

B16a The analysis of impacts on agriculture for all alternatives, including those along Bombing Range Road, has been revised to include a quantitative analysis of irrigated farmland. Refer to Section 3.2.7.6 for a discussion of impacts to pivot irrigation.

COMMENT(S)

B16 **Hale Companies (cont.)**

2) The DEIS Drastically Underestimates the Effects of the B2H Project on Surrounding Agricultural Land

The DEIS is unclear about the impact of the B2H Project on prime, irrigated farmland and appears to gloss over the dire economic losses on local farmers. The DEIS contains numerous inconsistencies regarding affected agricultural land and requires clarification. *See, e.g.,* DEIS § 3.2.6.6 at 3-438, *ll.* 29-30.

B16b

The Columbia-Snake River Irrigators Association (CSRIA) estimates that impacts to irrigated farmland during both construction and operations will be substantial -- in the range of 350 to 1,050 acres. Technical Memorandum from Darryll Olsen, CSRIA, to Tamara Gertsch, BLM at 3 (Mar. 17, 2015). The CSRIA, through a technical expert, recently estimated that the fair market value of irrigated farmland in the region is $7,500 - $10,000 per acre. *Id.* Thus, the total value of impacted irrigated agriculture would be approximately $2.6 million to $10.5 million, and the estimated present value of associated regional income loss would be about $12.5 million to $17.4 million. *Id.* at 4. The DEIS improperly characterizes these economic impacts as "low," when nothing could be further from the truth. *See* DEIS § 3.2.6.6 at 3-439, *ll.* 11-13. It is also important to note that the land near Bombing Range Road is some of the highest quality land in the entire Columbia Basin. It has an ideal soil type, unmatched proximity to processing customers, low-cost water, premier water supply, and flat topography. Given it's proximity to water sources, the unavailability of other ground due to restrictions on bare ground created by items such as conservation areas and the bombing range, this land is NOT replaceable.

B16c

The DEIS is also misleading because it claims that the Longhorn Variation and Longhorn Alternative will impact less prime farmland than the Proposed Action. This is inaccurate because the DEIS's acreage figures mistakenly focus on so-called "prime" farmland that theoretically *could* be farmed rather than actual irrigated farmland that is currently in use. BLM's reliance on theoretical farmland suggests a mistaken belief that irrigated farmland can simply be replaced. However, this is not the case, as irrigated farming is highly dependent on soils, geography, water deliver, and irrigation conditions – lost farmland cannot merely be moved to or recovered in other locales. Given the unique circumstances required for irrigated farming, BLM's concession in the DEIS that the Proposed Action will disturb 32 ***more*** acres of irrigated agriculture than the Proposed Action directly contradicts its claim that the Longhorn Variation will impose less harm on agriculture land than the Proposed Action. *See DEIS* at 3-438, *ll.* 29-30. Indeed, the Longhorn Variation and Longhorn Alternative will impose greater harm on irrigated farming than any of the other alternatives.

3) The DEIS' Cumulative Impact Analysis is Deficient

B16d

As BLM is aware, activity for wind and other energy projects in Morrow and nearby counties remains high. The B2H Project presents a continuing threat to surrounding farmland because it potentially creates a transmission line corridor straight through productive irrigated farmland. This is a particular concern because Oregon law provides that one of the factors in evaluating whether a project should be granted an exception to allow siting in areas designated for exclusive farm use is whether the project uses an existing right of way. *See* ORS 215.275. Thus, there is a high likelihood that this corridor will continue to expand and in turn consume additional farmland to meet increasing demands for transmission capacity.

In light of the above, the DEIS's cumulative impact analysis is deficient because it fails to address the cumulative impact of the B2H Project when considered in conjunction with the various wind energy projects proposed in the region. For instance, the DEIS omits discussion of the proposed 500 MW

RESPONSE(S)

B16b

The analysis of impacts on agriculture for all alternatives in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. See Section 3.2.7 for revisions.

The economic analysis in Section 3.2.17 has been updated with additional data on impacts on irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

B16c

The analysis of impacts on agriculture for all alternatives in the Final EIS includes a comparative quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7 for further discussion.

B16d

A discussion of this potential effect has been added to Types of Potential Effects in Section 3.2.7 and 3.3.3.7. Also, the Applicant has proposed an additional action to construct a 230-kV transmission line along Bombing Range Road for the potential wind farms (including those you have mentioned) that may in the future need to tie in to the grid. This 230-kV is discussed for each resource, including irrigated agriculture, under the Applicant's Proposed Action and is referred to as Additional Action – 69-Kilovolt Line Replacement Options 1, 2, and 3.

COMMENT(S)

RESPONSE(S)

B16 **Hale Companies (cont.)**

B16d

Wheatridge Wind Energy Facility, which has provided notice that it may connect to the grid through the Longhorn Variation corridor. The Wheatridge project should have been included and was inexplicably absent from the DEIS. Moreover, we understand that additional energy projects, including Perennial Windchaser and Ella Butte, could potentially utilize the transmission corridor created by the Longhorn Variation based on their location. Together, these projects generate an influx of power and create a risk of further cumulative impacts to irrigated farmland along the transmission corridor. We urge BLM to consider these impacts in detail and carefully weigh the severe effects on nearby farmland in light of other feasible routes such as the Slatt Alternative as described below.

4) **The Original, Southerly Route or the Slatt Alternative Should Be Considered for the B2H Project and the Longhorn Variation and Longhorn Alternative Should Be Removed from Consideration.**

The original Proposed Action, the Southerly Route, was wisely chosen by Idaho Power because of its minimal impact on Oregon farmland and was presented to the local community as the preferred route from 2010 through 2014. The Southerly Route would connect through the proposed Grasslands Substation. Similar to the Southerly Route is the Slatt Alternative, which would follow the Southerly Route before turning west and terminating at the existing Slatt substation, which is the major 500-kV interconnection hub serving the northeastern Oregon Region. The last-second deviation to the Bombing Range Road route is a surprising and concerning development for several reasons, outlined below.

- The Slatt substation is already built and suitable for wind farms. The Longhorn substation to the north has yet to be built and will meet strong resistance from the local community.
- The Southerly Route and the Slatt Alternative have minimal impact on the local agricultural community. That route will be met with little public, environmental and political resistance.
- The Longhorn Routes condemn prime farmland and will be much more expensive than the Southerly Route or the Slatt Alternative. Irrigation pivots cannot be used near the transmission lines, and once a crop circle is shortened, the entire farm is compromised. In connection with a condemnation action, each pivot circle area impacted would need to be purchased in its entirety from the property owner.
- The Southerly Route or the Slatt Alternative would prevent environmental and federal issues. Idaho Power's newly favored Bombing Range Road route will result in a negative impact on an endangered species that has been documented previously.

We welcome any opportunity to discuss our comments with you – please feel welcome to contact me with any questions you may have at the contact information provided on the letterhead.

Sincerely,

Craig Reeder
Hale Farms

COMMENT(S)

RESPONSE(S)

B17 Homeland Fireworks

From: EnviroLytical - B2H <info@envirolytical.com>
Sent: Thursday, March 19, 2015 7:06 PM
To: comment@boardmantohemingway.com
Subject: New Communication: Our family owns and operates a fireworks display company here in Malheur County. Our zoning here has a overlay for explosive storage. Having the line coming close to our storage can

Flag Status: Flagged

Bruce Lawson <brucelawson@homelandfireworks.com>
https://el2.envirolytical.com/communication/view/103369
B17a Our family owns and operates a fireworks display company here in Malheur County.
Our zoning here has a overlay for explosive storage.
Having the line coming close to our storage can and will limit our storage amounts.

This will not allow us to operate our business.

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B17a Analysis has been expanded to include alternative route variations with careful consideration of private lands. Input from the landowner and the impact on property will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

COMMENT(S)

RESPONSE(S)

B18 Idaho County Light & Power Cooperative Association

comment@boardmantohemingway.com

From: Jake Eimers <jeimers@iclp.coop>
Sent: Tuesday, January 27, 2015 10:06 AM
To: comment@boardmantohemingway.com
Cc: Hardin,Craig A (BPA) - TSE-TPP-2; Will Hart
Subject: website comment
Attachments: B2H Resolution - ICLP 1-26-15.pdf

Attn.: BLM, USFS, ODOE:

Gentlemen,

B18a Please see attached Resolution passed by the Board of Directors of Idaho County Light & Power Cooperative Association, Inc. The Board has taken the position to support the construction of the Boardman to Hemingway Transmission Line Project, including the Longhorn Variation alternative, and encourages your review and analysis to be completed and approved with expediency.

Thank you for your consideration.

Jay G Eimers, General Manager
Idaho County Light & Power Cooperative Assoc., Inc.
P.O. Box 300
Grangeville, ID 83530
Phone – (208)983-1610

1

B18a Comment noted.

COMMENT(S)

B18 **Idaho County Light & Power Cooperative Association (cont.)**

Idaho County Light & Power Cooperative Association, Inc

RESOLUTION

WHEREAS, the Board of Directors of Idaho County Light & Power Cooperative Association, Inc. did meet at a regularly scheduled meeting for the purpose of hearing reports and taking action on scheduled agenda items;

WHEREAS, the Bonneville Power Administration (BPA) has joined with Idaho Power (IP) and PacifiCorp (PAC) to propose and share in the construction of a new 500 kilovolt transmission line from a proposed substation near Boardman, Oregon to the Hemingway Substation near Melba, Idaho – known as the Boardman to Hemingway Transmission Line Project or B2H Project;

AND WHEREAS, PAC has terminated the agreement known as the South Idaho Exchange effective July 2016 through which the BPA provides transmission to consumer utilities throughout South Idaho, Northern Nevada & Utah and Western Wyoming & Montana;

AND WHEREAS, the B2H Project is not only an urgent need for those utilities but is the most cost-effective approach to provide the load service while also providing additional capacity for exchanging energy between the Pacific Northwest and the Intermountain West, which in turn improves reliability and increases opportunity for greater diversity in matching load and generation;

AND WHEREAS, Idaho County Light & Power Cooperative receives over 90% of its energy and transmission services from the BPA and whose members' rates would be adversely impacted by more costly alternatives to the B2H Project;

B18b NOW, THEREFORE, BE IT RESOLVED, that the Board of Directors of the Cooperative does hereby support and endorse the B2H Project that includes the Longhorn Variation alternative and does encourage the Bureau of Land Management and other impacted agencies to expedite the approval of requested rights of way and special use permits.

Ernie Robinson - President

1065 Hwy 13, P.O. Box 300, Grangeville, ID 83530
Ph(208)983-1610 Toll Free(877)212-0424 Fax(208)983-1432 Email: iclp@iclp.coop

RESPONSE(S) - CONTINUED

B18b Comment noted.

COMMENT(S)

RESPONSE(S) - CONTINUED

B18 **Idaho County Light & Power Cooperative Association (cont.)**

CERTIFICATION:

I, Cliff Tacke, Secretary of Idaho County Light & Power Cooperative Association, Inc., do hereby certify that the above Resolution was adopted at a Regular Meeting of the Board of Directors of the Cooperative on January 26, 2015, duly pursuant to notice, and at which a quorum was present.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Cooperative this 26th day of January, 2015.

Cliff Tacke - Secretary (Seal)

1065 Hwy 13, P.O. Box 300, Grangeville, ID 83530
Ph(208)983-1610 Toll Free(877)212-0424 Fax(208)983-1432 Email: iclp@iclp.coop

COMMENT(S) | **RESPONSE(S)**

B19 | **Idaho Power Company**

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RECEIVED
MAR 19 2015
B.L.M. VALE DISTRICT

Todd Adams
Project Leader
TAdams@idahopower.com

March 19, 2015

VIA ELECTRONIC MAIL and HAND DELIVERY

Tamara Gertsch, National Project Manager
Don Gonzalez, District Manager
Boardman to Hemingway Transmission Line Project
Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, Oregon 97918

Re: Idaho Power's Comments on the Draft Environmental Impact Statement and Land-use Plan Amendments for the Boardman to Hemingway Transmission Line Project

Dear Ms. Gertsch and Mr. Gonzalez:

On December 19, 2014, the Bureau of Land Management announced the availability of the Draft Environmental Impact Statement and Land-use Plan Amendments ("Draft EIS") for the Boardman to Hemingway Transmission Line Project ("B2H" or "Project"). *See* 79 Fed. Reg. 75834 (Dec. 19, 2014). Idaho Power expresses its appreciation for your efforts developing and completing the Draft EIS. The release of the Draft EIS is an important milestone in the permitting process for the Project, and we appreciate your dedication and professionalism as the Project has progressed through the National Environmental Policy Act ("NEPA") process.

Idaho Power's comments on the Draft EIS are set forth in this letter and the table attached hereto. The letter reemphasizes the critical need and objectives for the Project and discusses the Boardman area alternatives in light of the Project objectives. The attached table provides our comments on certain aspects of the analysis set forth in the Draft EIS. Please include this letter and the attached table in the administrative record for the Project.

I. Idaho Power's Objectives for the Project

Idaho Power's objectives for the Project have changed very little since Idaho Power began the federal permitting process in 2007. The Project would relieve existing transmission

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B19 **Idaho Power Company (cont.)**

constraints between the Pacific Northwest and Intermountain West regions, increase opportunities for the exchange of energy between the regions, ensure sufficient capacity for Idaho Power to meet its forecasted customer demand requirements, and help strengthen the reliability of the regional electric grid. For these reasons, the Project remains a critical piece of Idaho Power's future plans and the company's overall commitment to providing reliable, responsible, and fair-priced energy services. Idaho Power remains committed to securing the federal and state permits required to construct the Project.

A. Existing Transmission Constraints

Congestion occurs on the electric transmission system when electrical demands exceed electrical limits. Transmission congestion can limit the flow of low-cost power to meet demand, impede the achievement of public policy goals, or create reliability concerns.

Here, the transmission system connecting the Pacific Northwest and Intermountain West regions—i.e., the Idaho-Northwest transmission path—is at capacity limits during peak electrical demand and is causing congestion-related issues. Idaho Power operates the Idaho-Northwest transmission path, which consists of multiple high voltage transmission lines, connecting Idaho and eastern Oregon with the Pacific Northwest region. In the past, Idaho Power has needed to utilize all of the transmission capacity on the path to serve the company's load. Also, due to congestion, Idaho Power has had to cut transmission service schedules across the transmission path in order to maintain Western Electricity Coordinating Council ("WECC")-accepted reliability limits.

Repeated regional studies have concluded the critical need to alleviate transmission congestion between the Pacific Northwest and Intermountain West regions. In the Western Interconnection, transmission planning has evolved into a three-tiered approach where an interconnection-wide entity, in this case WECC, conducts inter-regional planning at a high level, several regional planning groups focus with greater depth on their specific areas, and transmission providers perform local planning studies within their local area. The Northern Tier Transmission Group is a regional planning group seeking to improve the operation and expansion of the high-voltage transmission system that delivers power to consumers in Oregon, Washington, California, Idaho, Montana, Wyoming, and Utah. The Northern Tier Transmission Group determined in its 2009, 2011, and 2013 Biennial Transmission Plans that the existing regional transmission system was not adequate to serve the projected regional needs and that additional transmission system upgrades would be needed to reliably meet the projected regional needs. B2H was one of the major regional transmission upgrades identified and included in the Biennial Transmission Plans to meet the future needs of the region.

B2H also has been recognized as a nationally-important transmission project. In October 2009, nine federal entities, including the Council on Environmental Quality, Department of the Interior, Department of Agriculture, Department of Defense, Environmental Protection Agency, and Advisory Council on Historic Preservation entered into a Memorandum of Understanding committing each signatory to increase their coordination to expedite and simplify the process for analyzing and permitting transmission line projects on federal lands and recognizing that

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B19 **Idaho Power Company (cont.)**

"[e]xpanding and modernizing the transmission grid by siting proposed electric transmission facilities will help to accommodate additional electrical generation capacity over the next several decades, including renewable generation as well as improve reliability and reduce congestion." Memorandum of Understanding Regarding Coordination in Federal Agency Review of Electric Transmission Facilities on Federal Land at 2 (Oct. 23, 2009). In October 2011, the President formed the Rapid Response Transmission Team ("RRTT"), comprised of the nine agencies that signed the 2009 Memorandum of Understanding, to prioritize and expedite the development of seven certain transmission projects. B2H was one of those priority projects, which the President has determined would help increase electric reliability, integrate new renewable energy into the grid, and save consumers money. *See* Council on Environmental Quality RRTT website at https://www.whitehouse.gov/administration/eop/ceq/initiatives/interagency-rapid-response-team-for-transmission.

B. Providing Additional Energy Capacity between the Regions

The Project is designed to alleviate transmission constraints and provide operational flexibility by adding approximately 1,000 megawatts ("MW") of much needed bi-directional capacity between the Pacific Northwest and Intermountain West regions. The additional capacity will help improve the regions' ability to transmit low-cost energy from a variety of generation sources to serve residences, farms, businesses, and other customers throughout the regions. The ability to exchange additional energy between the regions increases efficiencies, possibly helping to avoid the need to construct new power plants, which is good for the environment and helps to keep electricity rates lower.

With respect to Idaho Power's specific needs, B2H has consistently been identified as part of the preferred resource portfolio in the company's Integrated Resource Plans ("IRPs") dating back to 2009. In fact, the Project, or a general transmission system upgrade between Idaho and the Pacific Northwest similar to B2H, has been identified in Idaho Power IRPs dating back to 2002. The IRPs describe the company's projected need for additional electricity and the resources necessary to meet the needs while balancing reliability, environmental responsibility, efficiency, and cost. According to Idaho Power's 2013 IRP, the number of customers in Idaho Power's service area is expected to increase from approximately 490,000 in 2009 to over 660,000 by 2032. Firm peak-hour load (the peak hourly electricity that the system must supply when demand is at its highest) has increased from 2,052 MW in 1990 to over 3,400 MW. Average firm load (the average annual demand from customers) has increased from 1,200 MW in 1990 to 1,745 MW in 2012.

Per requirements from the Federal Energy Regulatory Commission ("FERC"), Idaho Power, as a transmission provider, is obligated to expand its transmission system to provide requested firm point-to-point and network transmission service, and to construct and place in service sufficient capacity to deliver resources reliably to network and native load customers. Idaho Power must maintain compliance with reliability standards that require Idaho Power to have a plan to operate and supply projected customer demands and projected 3rd party transmission reservations at all demand levels over a range of forecast system demands. B2H would contribute to Idaho Power meeting its reliability requirements.

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B19 **Idaho Power Company (cont.)**

C. Integrating Renewable Energy Resources

Wind and solar resource development has accelerated in recent years. B2H would help to reliably interconnect these often remote renewable resources and efficiently deliver power to local load centers. The Project would help facilitate access to new market tools such as energy imbalance markets, which could help reduce power supply costs for customers and integrate intermittent resources such as wind and solar. These tools allow energy companies to take advantage of the real time regional diversity of load and generation and move energy back and forth between balancing areas, but can only be implemented if transmission capacity is available (or created).

D. Uncertain Future

Additionally, in June 2014, the U.S. Environmental Protection Agency released its proposed rule to regulate carbon emissions from existing power plants under Clean Air Act section 111(d). The proposed rule seeks to have the overall effect of reducing carbon dioxide emissions from the electric system 30 percent below 2005 levels by 2030, with interim goals starting in 2020. The proposed rule provides state-specific, rate-based goals for carbon dioxide emissions from the power sector, as well as guidelines for states to follow in developing plans to achieve the state-specific goals. EPA is scheduled to release its final rule in summer 2015, and the states are scheduled to submit their compliance plans in summer 2016. There is significant uncertainty with respect to the impact EPA's final rule or the states' plans will have on Idaho Power's existing generation resources. B2H, by providing additional access to outside energy markets, may provide flexibility to respond to the forthcoming 111(d) requirements.

II. Boardman Area Substation and Segment 1

A. Grassland and Horn Butte Routes

In order for the Project to meet its objective of adding approximately 1,000 MW of bi-directional capacity between the Pacific Northwest and Intermountain West regions, the point of interconnection at the northern terminus must provide sufficient capacity to: 1) transfer an additional 1,050 MW of power from the Bonneville Power Administration (BPA) 500-kV transmission system in the Pacific Northwest west-to-east across the Idaho-Northwest transmission path; 2) transfer an additional 1,000 MW of power east-to-west across the Idaho-Northwest transmission path; and 3) allow for actual power flows on the B2H line of up to approximately 1,500 MW, accounting for variations in actual power flows of the various transmission lines comprising the Idaho-Northwest transmission path.

When Idaho Power began the federal permitting process for B2H in 2007, other transmission development projects were being proposed in the Pacific Northwest that influenced Idaho Power's northern terminus location options for the Project. Portland General Electric's ("PGE") Cascade Crossing 500-kV project was of particular note. In fact, in 2008, Idaho Power and PGE executed a Memorandum of Understanding concerning Boardman Area transmission development, with the intent of sharing development plans and developing facilities

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B19 **Idaho Power Company (cont.)**

B19a

collaboratively to assist each company in fulfilling their respective service and system reliability obligations. The proposed Grassland Substation was contemplated as an interconnection point between the two projects that could help each company with their respective project objectives. The proposed Horn Butte Substation was introduced as an alternative location to connect to the Cascade Crossing project.

However, since the NEPA process was initiated, the transmission development landscape has changed. Several of the development projects under consideration during the time of original application have subsequently been cancelled. Notably, in 2013, PGE indefinitely suspended the Cascade Crossing project.

In the absence of the Cascade Crossing, the Grassland and Horn Butte routes set forth in the Draft EIS do not meet the Project objectives. Neither the Grassland nor Horn Butte substations would provide the required approximate 1,000 MW of bi-directional capacity and up to 1,500 MW of actual power flow capability. Therefore, Idaho Power does not support the Grassland or Horn Butte routes.

B. Longhorn Routes

B19b

B19c

The Longhorn Substation is the only substation discussed in the Draft EIS that would meet Idaho Power's objectives. Therefore, Idaho Power supports the alternatives that would connect the Project with the Longhorn Substation. Additionally, Idaho Power has submitted two easement applications to the United States Navy requesting access across the Naval Weapons Systems Training Facility property west of Bombing Range Road in the Boardman, Oregon area. The applications seek one of two possible options for a right-of-way across the Navy property: 1) a new 250-ft right-of-way west of BPA's existing 69-kV transmission line, or 2) a right-of-way providing that the Project would assume BPA's existing 69-kV transmission line easement on the bombing range and BPA's 69-kV line would be re-constructed elsewhere, while maintaining reliable service to BPA's customers. The route along the west of Bombing Range Road would be a route variation of the Longhorn Variation, following a path similar to the Longhorn Variation as it makes its way to the Longhorn Substation with the exception that the line would run along the west and not the east of Bombing Range Road for that portion of the route crossing the Navy property. Idaho Power requests that BLM consider in the Final EIS each of the proposed west of Bombing Range Road routes as route variations.

Idaho Power prefers a west of Bombing Range Road route variation for Segment 1. However, if the Navy declines Idaho Power's right-of-way request, Idaho Power supports the Longhorn Alternative or Longhorn Variation because each of the routes provides access to the Longhorn Substation.

III. Reference Materials

In the attached comment table, we identified reference materials that BLM should consider in their decision-making for the Project and the same should be included in the

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B19a Comment noted. This information has been incorporated into the Final EIS.

B19b Comment noted. This information has been incorporated into the Final EIS.

B19c Comment noted. This information has been incorporated in the Final EIS.

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B19 **Idaho Power Company (cont.)**

administrative record. If you do not have or cannot obtain a copy of the identified materials, please let us know and we will provide you with a copy of the same.

Sincerely,

Todd Adams

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Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
Entire Document					
Entire Document	n/a	n/a	Project, project, B2H Project, B2H project	The document refers to the Project using multiple terms and inconsistent capitalization, e.g., "Project," "project," "B2H Project," and "B2H project." Consider referring to the Project only as "Project" or "B2H" and being consistent in applying and capitalizing the terms throughout the document.	Revised as suggested; in the Final EIS, the project is referred to as "B2H Project."
Entire Document	n/a	n/a	B2H Project area, B2H project area, Project area, project area	The use and capitalization of the terms "B2H Project area," "B2H project area," "Project area," and "project area" is inconsistent. Consider using only the term "Project Area" and being consistent in applying and capitalizing the terms throughout the document.	The text has been revised so that "B2H Project area" refers to the entire project area and "study corridor" refers to the area inventoried or analyzed for a particular resource.
Entire Document	n/a	n/a	Proposed Action, proposed action	The use and capitalization of the terms "Proposed Action" and "Proposed action" is inconsistent. Consider using only the term "Proposed Action" and being consistent in applying and capitalizing the terms throughout the document.	Revised
Entire Document	n/a	n/a	Resource Reports	To the extent BLM's impact analysis or data in the Final EIS differs from that set forth in the resource reports for a particular resource category, explain how the analysis or data differs and BLM's decision for utilizing its impact analysis approach or data and not that set forth in the resource report.	Text has been added to the EIS explaining the overall study approach (Section 2.5) and study and analysis methods for each resource (throughout Chapter 3).
Entire Document	n/a	n/a	n/a	Nothing in the cover letter or this table waives Idaho Power's right to amend its SF-299 or POD, which right Idaho Power expressly reserves.	Comment noted
Table of Contents					
Table of Contents	n/a	n/a	n/a	Consider reviewing the Table of Contents prior to publication of the Final EIS. In at least one instance, the table does not include one of the section headings—e.g., section 3.2.1 Earth Resources.	Revised as suggested; a table of contents has been regenerated to capture all heading levels through level 4.
Executive Summary					
Executive Summary	p. S-1	24-26	NEPA requires that federal agencies take a hard look and consider the impacts of an action on the human and natural environment before decisions are made.	Consider replacing the term "human and natural environment" with text consistent with the regulatory definition of human environment at 40 C.F.R. § 1508.14 as follows: "NEPA requires that federal agencies take a hard look and consider the impacts of a proposed action on the ~~human and natural environment~~ human environment, including the natural and physical environment and the relationship of people with that environment, before decisions are made."	Revised
Executive Summary	p. S-2	6-8	Rather, the B2H Project would meet Idaho Power's obligations to meet Federal Energy Regulatory Commission, Oregon Public Utility Commission, and the Idaho Public Utility Commission requirements.	Clarify that the mentioned obligations require Idaho Power to meet growing load needs and maintain its system in a safe, reliable, and economic manner: "Rather, the B2H Project would ~~meet~~ help Idaho Power ~~obligations to~~ meet its Federal Energy Regulatory Commission, Oregon Public Utility Commission, and the Idaho Public Utility Commission requirements to meet growing load needs and provide a safe, reliable, and economic power supply."	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Executive Summary	p. S-6	2-4	In addition to evaluating the Proposed Action, NEPA requires federal agencies to develop, study, and evaluate alternatives to the Proposed Action to address unresolved conflicts concerning alternative uses of available resources.	Consider using the regulatory definition of the range of alternatives to be considered in the EIS, as set forth in 40 C.F.R. § 1502.14 ("Rigorously explore and objectively evaluate all reasonable alternatives . . . ."). Accordingly, consider the following edits: "In addition to evaluating the Proposed Action, NEPA requires federal agencies to develop, study, and evaluate all reasonable alternatives to the Proposed Action ~~to address unresolved conflicts concerning alternative uses of available resources~~."	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Executive Summary	p. S-6	5-6	This summary also identifies an Environmentally Preferred Alternative and an Agency Preferred Alternative.	Here in the Draft EIS the environmentally preferred alternative and agency preferred alternative are the same. If the same holds true in the Final EIS, the reader would benefit from having that information at the beginning of this section. Consider the following addition, if applicable to the Final EIS: "This summary also identifies an Environmentally Preferred Alternative and an Agency Preferred Alternative. In this Final EIS, the Environmentally Preferred Alternative and Agency Preferred Alternative are the same."	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Executive Summary	p. S-6	28-29	The undeveloped area within the substation yard would allow future users to tie into the B2H or Boardman to Slatt Line.	The proposed Horn Butte station site would be designed and built for B2H purposes. No "future users" would be involved in the development of the station.	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Executive Summary	p. S-7	6-8	The terms of the approach zone easement limit structure heights within the easement to a maximum of 35 feet above grade; this height limitation may affect the design of structures in the easement area.	There are existing transmission line structures exceeding 35-feet in height that are located on lands subject to Navy approach zone easements. Idaho Power and the Navy have discussed the existing transmission structures and the proposed B2H Project, and the Navy	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
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				has indicated to Idaho Power that the Navy would consider providing for B2H Project structures on lands subject to Navy approach zone easements, provided the same are not taller than 100 feet. Where the proposed action or alternatives would cross lands subject to a Navy approach zone easement, Idaho Power would use structures that are no taller than 100 feet above ground level.	
Executive Summary	p. S-7	30-34	The Glass Hill Alternative was developed to address concerns about the Proposed Action's proximity to the Ladd Marsh Wildlife Management Area and visibility concerns from La Grande in Union County. The Glass Hill Alternative is approximately 7.5-miles-long located to the west of the Proposed Action on private land in Union County near La Grande, Oregon. The Glass Hill Alternative is the same length as the Proposed Action.	The statement that the Glass Hill Alternative was developed to avoid visual impacts to La Grande and the Ladd March Wildlife Management Area, without mentioning the myriad of additional considerations that went into the route's development, is incomplete. The Proposed Action and Glass Hill Alternative were developed in response to multiple competing landowner, environmental resources, visual impact, and constructability considerations identified during the CAP process and NEPA scoping. *See* Supplemental Siting Study (June 2012). Revise the text as follows: "The Glass Hill Alternative and Proposed Action ~~was~~ were developed ~~to address concerns about the Proposed Action's proximity to the Ladd Marsh Wildlife Management Area and visibility concerns from La Grande in Union County~~ in response to multiple competing landowner, environmental resource, visual impact, and constructability considerations identified during the CAP process and NEPA scoping. *See* Supplemental Siting Study (June 2012). The Glass Hill Alternative is approximately 7.5-miles-long located to the west of the Proposed Action on private land in Union County near La Grande, Oregon. The Glass Hill Alternative is the same length as the Proposed Action."	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Executive Summary	pp. S-8, S-9, S-11, S-13, S-14; Figures S-2, S-3, S-4, S-5, S-6	n/a	n/a	In the Final EIS, consider showing the Agency Selected Alternative on each of these figures so that the reader can see the agency's chosen route.	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Executive Summary	p. S-16	7	With implementation and maintenance of the SWPPP, ESCP, SPCC and appropriate design features in	Consider providing the full name and not the acronym for SWPP, ESCP, and SPCC the first time the terms are used in the document.	Revised
Executive Summary	p. S-25	31	n/a	The Executive Summary does not include a section summarizing the Cumulative Effects section of the Draft EIS, Section 3.3. Consider adding a summary of the Cumulative Effects section.	The Summary has been revised and a section addressing cumulative effects has been added.
Executive Summary	p. S-27	6	n/a	The Plan Amendment section is not clear regarding which segment or route within the segment would implicate a particular plan amendment. Consider identifying, perhaps in a chart, the segment and proposed action or alternative in each segment that would implicate a plan amendment.	The section addressing plan amendments has been revised for the Final EIS.
Chapter 1 Purpose and Need					
1.1 Purpose and Need/ Introduction	p. 1-3	9-11	If decommissioning of the transmission line were to occur, additional analysis of the effects of decommissioning would be required under NEPA and would take place at that time.	Explain whether, and if so how, BLM considered direct, indirect, and cumulative impacts of decommissioning the Project. If BLM did not consider impacts of decommissioning the Project, provide an explanation for not doing so.	The potential effects of decommissioning are addressed in Section 2.3.5.
1.1 Purpose and Need/ Introduction	p. 1-3	32	In addition to analyzing and disclosing the potential impacts of the Proposed Action and alternatives on the natural and human environment, this Draft EIS analyzes	Consider replacing the term "human and natural environment" with text consistent with the regulatory definition of human environment at 40 C.F.R. § 1508.14 as follows: "In addition to analyzing and disclosing the potential impacts of the Proposed Action and alternatives on the ~~natural and~~ human environment, including the natural and physical environment and the relationship of people with that environment, this Draft EIS analyzes . . . ."	Revised
1.1 Purpose and Need/ Introduction	p. 1-1	15-16	The project's goal is to provide additional electrical load capacity between the Pacific Northwest region and the Intermountain region of southwestern Idaho. The B2H Project would alleviate existing transmission constraints and ensure sufficient capacity to meet present and forecasted load requirements.	Alleviating transmission constraints and meeting load requirements are not the only benefits of the B2H Project. This sentence should be amended to provide that the B2H Project will benefit customer needs, which may include but are not limited to load requirements: "The project's goal is to provide additional electrical ~~load~~ capacity between the Pacific Northwest region and the Intermountain region of southwestern Idaho. The B2H Project would alleviate existing transmission constraints and ensure sufficient electrical capacity to meet present and forecasted ~~load requirements~~ customer needs."	Revised
1.2 Purpose and Need/Agencies' Purpose	p. 1-4	24	n/a	The agencies' purpose and need statement should recognize that the B2H Project has been designated for special attention by the	Revised

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Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
and Need				President's Rapid Response Transmission Team (RRTT). Consider adding a paragraph to Section 1.2 discussing the RRTT: "B2H has been recognized as a nationally-important transmission project. In October 2009, nine federal entities, including the Council on Environmental Quality, Department of the Interior, Department of Agriculture, Department of Defense, Environmental Protection Agency, and Advisory Council on Historic Preservation entered into a Memorandum of Understanding committing each signatory to increase their coordination to expedite and simplify the process for analyzing and permitting transmission line projects on federal lands and recognizing that "[e]xpanding and modernizing the transmission grid by siting proposed electric transmission facilities will help to accommodate additional electrical generation capacity over the next several decades, including renewable generation as well as improve reliability and reduce congestion." Memorandum of Understanding Regarding Coordination in Federal Agency Review of Electric Transmission Facilities on Federal Land at 2 (Oct. 23, 2009). In October 2011, the President formed the Rapid Response Transmission Team ("RRTT"), comprised of the nine agencies that signed the 2009 Memorandum of Understanding, to prioritize and expedite the development of seven certain transmission projects. B2H was one of those priority projects, which the President has determined would help increase electric reliability, integrate new renewable energy into the grid, and save consumers money. See Council on Environmental Quality RRTT website at https://www.whitehouse.gov/administration/eop/ceq/initiatives/interagency-rapid-response-team-for- transmission."	
1.2.1 Purpose and Need/Agencies' Purpose and Need /BLM	p. 1-4	28	The BLM's purpose and need is further guided by the Energy Policy Act of 2005, Executive Order 13604, and the President's Climate Action Plan (June 25, 2013), which recognized the need Johnto improve domestic energy production, to develop renewable energy resources, and to improve infrastructure for collection and distribution of energy resources.	To the extent that the Energy Policy Act of 2005, Executive Order 13604, and the President's Climate Action Plan (June 25, 2013) apply to each of the federal agencies and not just BLM, this sentence should be moved to Section 1.2.	Revised
1.3 Purpose and Need/Decisions To Be Made	p. 1-7	20	n/a	Neither the Federal Land Policy and Management Act nor the National Environmental Policy Act provides BLM or other federal entities decision-making authority over the location of the transmission line project on non-federal lands or the applicant's activities on non-federal lands. The "Decisions to be Made" section should clarify that the federal entities' decisions provided for in the EIS and ROD apply to activities on federal lands only, and that the location of the project and the applicant's activities on non-federal lands would be decided by the applicable state, county, or local government entity or entities and not the federal agencies. Consider adding a new paragraph following line 20 regarding the same: "Approximately two-thirds of the Project would be located on non-federal lands. The nature and scope of the right-of-way as it crosses the non-federal lands would be decided by applicable state, county, or local government entities and not the federal entities. With respect to this document and the related ROD, the federal agencies are not deciding the nature and scope of the right- of-way as it crosses the non-federal lands."	Revised
1.3.1 Purpose and Need/Decisions To Be Made /BLM	p. 1-7	35	n/a	Consider adding a bullet list of the decisions to be made by BLM. *See, e.g.*, Gateway West Final EIS at 1-9. The list should address, among other things, the issues raised by Idaho Power in its comments above on Section 1.3 regarding non-federal lands. Providing a bullet list that addresses the non-federal lands issue would be consistent with BLM's approach in the Gateway West Final EIS: "The BLM decisions to be made are to: • Decide whether to grant, grant with modifications, or deny all or part of the ROW application for the Project; • Decide if one or more BLM land use plan should be amended to allow the proposed Project; • Determine the appropriate location for the Project on BLM-administered federal lands, considering multiple-use objectives; and	The text in Section 1.3.1 was not reformatted as suggested; however, the text has been edited for clarity.

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				• Determine the terms and conditions to be applied to the construction, operation, and maintenance of the Project on BLM-administered federal lands."	
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-9	13-16	Idaho Power's objective for the B2H Project is to provide additional capacity to connect the Pacific Northwest region with the Intermountain region of southern Idaho to alleviate existing transmission constraints between the two areas and to ensure sufficient capacity so that Idaho Power can meet present and forecasted load requirements.	Alleviating transmission constraints and meeting load requirements are not the only benefits of the B2H Project. This sentence should be amended to provide that the B2H Project will benefit customer needs, which may include but are not limited to load requirements: "Idaho Power's objective for the B2H Project is to provide additional transmission capacity to connect the Pacific Northwest region with the Intermountain region of southern Idaho to alleviate existing transmission constraints between the two areas and to ensure sufficient electrical capacity so that Idaho Power can meet ~~present and~~ forecasted ~~load requirements~~ customer needs."	Revised
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-9	16-21	The number of customers in I's service area is expected to increase from approximately 490,000 in 2009 to over 680,000 by 2029. Firm peak-hour load (the peak hourly electricity that the system must supply when demand is at its highest) has increased from 2,052-megawatts (MW) in 1990 to over 3,000 megawatts (MW) in 2006, 2007, 2008, and 2009. Average firm load (the average annual demand from customers) has increased from 1,200 MW in 1990 to 1,800 MW in 2008 (Idaho Power 2011d).	The figures provided in this paragraph should be updated consistent with the most-recent Integrated Resource Plan released in 2013: "The number of customers in Idaho Power's service area is expected to increase from approximately 490,000 in 2009 to over ~~680~~660,000 by ~~2029~~2032. Firm peak-hour load (the peak hourly electricity that the system must supply when demand is at its highest) has increased from 2,052-megawatts (MW) in 1990 to over ~~3,000~~3,400 megawatts (MW) ~~in 2006, 2007, 2008, and 2009~~. Average firm load (the average annual demand from customers) has increased from 1,200 MW in 1990 to ~~1,800~~1,745 MW in ~~2008~~2012 (Idaho Power ~~2011d~~2013 IRP)."	This section has been updated with the most recent information in accordance with comments provided by Idaho Power Company.
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-9	22-24	The proposed transmission line would connect with other transmission lines at the Portland General Electric's Grassland Substation or one of two alternative substations at the northern terminus near Boardman, Oregon and the Hemingway Substation at the southern terminus near Melba, Idaho.	The following statement should be included to provide a more accurate description of Idaho Power's objectives for the B2H Project: "The points of interconnection must provide sufficient capacity to: 1) transfer an additional 1,050 MW of power from the Bonneville Power Administration (BPA) 500-kV transmission system in the Pacific Northwest west-to-east across the Idaho-Northwest transmission path; 2) transfer an additional 1,000 MW of power east-to-west across the Idaho-Northwest transmission path; and 3) allow for actual power flows on the B2H line of up to approximately 1,500 MW, accounting for variations in actual power flows of the various transmission lines comprising the Idaho-Northwest transmission path. The proposed transmission line would ~~connect with other transmission lines at the Portland General Electric's Grassland Substation or one of two alternative substations~~ provide a connection to Bonneville Power Administration owned 500-kV transmission facilities at the ~~northern terminus~~ Longhorn Station near Boardman, Oregon and would connect to the 500-kV Hemingway Substation at the southern terminus near Melba, Idaho."	Revised
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-9	32-33	These high-capacity transmission lines are often the only way to transport electricity from where it is generated to where it is needed to serve load.	Add the term "bulk" to more accurately describe the nature of the electricity being transported. "These high-capacity transmission lines are often the only way to transport bulk electricity from where it is generated to where it is needed to serve load."	Revised
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-10	3-4	The B2H Project would add capacity to transmit electricity during high summer-month loading conditions and to accommodate third-party transmission requests.	This sentence suggests that Idaho Power necessarily would be able to accommodate third-party transmission requires. However, accommodating such requests would be subject to capacity availability and regulatory compliance. Consider deleting the third-party request language to avoid any misrepresentation that such requests necessarily will be filled: "The B2H Project would add capacity to transmit electricity during high summer-month loading conditions ~~and to accommodate third-party transmission requests~~."	Revised
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-10	10-16	Idaho Power has received more than 4,000 MW of transmission service requests on the Idaho to Pacific Northwest path between 2005 and 2014. Of the service requests, only 133 MW were granted up through 2007 due to the limited available transmission capacity of the system. There are currently active requests in study status that are expected to commence operations when the B2H Project is completed. The development of wind and other renewable resources in response to state renewable portfolio standards is anticipated to further	The service request information should be deleted: "~~Idaho Power has received more than 4,000 MW of transmission service requests on the Idaho to Pacific Northwest path between 2005 and 2014. Of the service requests, only 133 MW were granted up through 2007 due to the limited available transmission capacity of the system. There are currently active requests in study status that are expected to commence operations when the B2H Project is completed.~~ The development of wind and other renewable resources in response to state renewable portfolio standards is anticipated to further increase the demand for transmission capacity between the Intermountain region and the Pacific Northwest (Idaho Power 2011d)."	Revised

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			increase the demand for transmission capacity between the Intermountain region and the Pacific Northwest (Idaho Power 2011d).		
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-10	23-25	The redundancy enables the bulk transmission system to reliably operate in any single element (i.e., generation unit, transmission line segment or substation equipment) or multiple elements are lost.	The underlined word "or" should be "if" as follows: "The redundancy enables the bulk transmission system to reliably operate in any single element (i.e., generation unit, transmission line segment or substation equipment) ~~or~~if multiple elements are lost."	Revised
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-10	25-26	Adding new transmission facilities to the network adds additional redundancy during outages (Idaho Power 2011d).	The phrase "adds additional" is redundant; consider omitting "additional." Also, consider amending the sentence to recognize that adding transmission not only provides redundancy but it also make the system more robust: "Adding ~~new transmission facilities to the network adds additional redundancy during outages~~ the B2H project to the existing transmission system will create additional redundancy and will make the transmission system more robust (Idaho Power 2011d)."	Revised
1.4 Purpose and Need/Idaho Power's Objectives	p. 1-11	14-15	Notably, the B2H Project—or a general resource similar to it—has served as a critical component of every acknowledged Idaho Power IRP since 2000.	This sentence should read: "Notably, the B2H Project—or a general ~~resource~~ transmission system upgrade between Idaho and the Pacific Northwest similar to it—has ~~served as a critical component of every acknowledged Idaho Power IRP since 2000~~been documented in Idaho Power's IRPs dating back to 2002."	Revised
1.6.3 Purpose and Need/Scoping and Public Involvement/ Issues Identification	p. 1-15	29	Water Quality	Water quality is listed twice under issues identified, once on Page 1-15, line 29 and then again on Page 1-16, line 3. Consider deleting the second reference as it is redundant and therefore unnecessary.	Revised
1.6.3 Purpose and Need/Scoping and Public Involvement/ Issues Identification	p. 1-17	13 and 14	How much land area will be required for the project? Will the project be located in existing utility corridors?	There is no "disagreement, debate, or dispute" regarding the quantity of land affected by the project or the length of the project that would be located within a utility corridor. *See* BLM NEPA Handbook § 6.4 (defining what constitutes an "issue" for the purpose of BLM NEPA analysis). Those figures are fixed and not subject to conflicting interpretation. Therefore, the two identified statements regarding the same should not be considered "issues" and should be omitted from EIS Section 1.6.3.	The two statements will remain as they reflect concern about (1) the amount of land that may be removed from production or other land use and (2) concern for locating the transmission line outside utility corridor where utility corridors are available.
1.7 Purpose and Need/Relationships to Federal Plans	p. 1-19	n/a	n/a	Section 1.7 should discuss Naval Weapons Systems Training Facility Boardman plans, programs, or both, including the August 2012 Draft EIS related to proposed military readiness activities.	Text combined with preceding citation.
1.7.2 Purpose and Need/Relationships to Federal Plans/USFS Land and Resource Plan	p. 1-20	13-21	n/a	The Draft Blue Mountain Forest Land and Resource Plan Revision should be considered a reasonably foreseeable future action and should be analyzed in the B2H EIS.	Inserted
1.8 Purpose and Need/Major Laws	p. 1-24/Table 1-1		Relevant Authority: Clean Water Act Section 404(b)(1) Guidelines	The Clean Water Act Section 404(b)(1) guidelines are encompassed under the preceding general Clean Water Act citation, and therefore, the 404(b)(1) reference is redundant and unnecessary. Consider deleting the 404(b)(1) reference.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-31/Table 1-3		Summary of Federal Environmental Permitting Requirements; column 1	Table should include reference to Clean Water Act, Construction General Permit under National Pollutant Discharge Elimination System (NPDES) for the Idaho portion of the project.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-31/Table 1-3		Summary of Federal Environmental Permitting Requirements	Include NOAA/MNFS Incidental Take Statement for Marine and Anadromous Fish – Federal Fish and Wildlife Permit.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-31/Table 1-3		Summary of Federal Environmental Permitting Requirements	Include BLM Paleontological Resources Use Permit.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-31/Table 1-3		Summary of Federal Environmental Permitting Requirements	Include USFWS Endangered Species Act ESA Consultation, Incidental Take Permit, or both.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-32/Table 1-4		Summary of Oregon Environmental Permitting Requirements	Include Oregon Department of Agriculture (ODA) Plant Division Public Land Action Permit. Any land action on Oregon non-federal public lands which results, or might result, in the taking of a threatened or endangered species, requires either a permit or a formal consultation with ODA.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-32/Table 1-4		Summary of Oregon Environmental Permitting Requirements	Include Oregon Department of Water Quality Division (ODEQ) Water Pollution Control Facilities (WPCF) Permit.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-32/Table 1-4		Summary of Oregon Environmental Permitting Requirements	Description should include permit type: NPDES Permit 1200-C.	Inserted
1.10 Purpose and Need/Required Permits	p. 1-32/Table 1- 4		Summary of Oregon Environmental Permitting Requirements	Include Oregon Department of Forestry (ODF) Permit to Operate Power Driven Machinery. Idaho Power intends to operate power driven machinery in forested areas during construction of the Project, and if	Inserted

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				so, Idaho Power will obtain a Permit to Operate from ODF.	
1.10 Purpose and Need/Required Permits	p. 1-32/Table 1- 4		Summary of Oregon Environmental Permitting Requirements	Include Oregon Department of Fish and Wildlife (ODFW) Fish Passage Plan.	Since a Fish Passage Plan is related to law regarding fish passage, described in the preceding row, the preceding row was edited to reflect the Fish Passage Plan.
Chapter 2 Proposed Action					
2.2.7 through 2.2.10 Proposed Acton/Right-of-Way Acquisition & Project Facilities & Design Features & Mitigation	n/a	n/a	n/a	The right-of-way requirements, project components, design features, and mitigation requirements set forth in subsections 2.2.7 through 2.2.10 are common to all action alternatives and not only the proposed action. Consider moving these subsections into a new section for "Project Provisions Common to All Action Alternatives."	Revised
2.2.7 Proposed Action/ Right-of-Way Acquisition	p. 2-10	1-2	Land for substation or communication sites would be obtained in fee simple title where located on private land.	Idaho Power will seek to locate the communication stations within the boundaries of the transmission line rights-of-way and provide for the communication stations in the relevant transmission line right-of- way agreements. Accordingly, Idaho Power may obtain access to the communication station properties through easements and not by obtaining fee simple title. Amend the sentence to read: "Rights to the ~~L~~land for substation or communication sites would be obtained through easements or in fee simple title where located on private land."	Revised
2.2.7 Proposed Action/ Right-of-Way Acquisition	p. 2-10	3-12 & Footnote 1	At the time the November 2011 Revised POD and SF 299 was submitted, the Western Electricity Coordinating Council (WECC) and North American Electric Reliability Corporation had established reliability criteria for high-voltage transmission lines. To achieve the reliability and capacity needed to serve present and future loads within IPC's service areas, the WECC criteria required a minimum separation by at least "the longest span length of the two transmission circuits at the point of separation or 500 feet, whichever is greater, between the transmission circuits" (TPL- [001-004]-WECC-1-CR, April 18, 2008). Footnote 1 - The rating criteria was changed to a minimum of separation distance of 250 feet from the nearest 230-kV or higher voltage transmission line (TPL-001-WECC-CRT-2, April 1, 2012). B2H line separation is consistent with the 2012 WECC (Western Electricity Coordinating Council) guidance.	Idaho Power agrees with BLM's determination that the separation distances between the Proposed Action and Alternatives and the existing transmission lines are consistent with TPL-001-WECC-CRT- 2. However, BLM should clarify that TPL-001-WECC-CRT-2.1 is not a siting criteria and that WECC does not require new transmission projects be located 250 feet from existing transmission lines. Rather, the transmission line owner is responsible for constructing and siting its project in a manner sufficient to maintain reliability, lest the transmission path lose its WECC rating. System Performance Criterion TPL-001-WECC-CRT-2.1 requires electrical utilities to conduct system simulations and assessments to ensure that reliable systems are developed to meet specified performance requirements and that systems are modified or upgraded to meet present and future system needs. The assessment requirements of TPL-001-WECC-CRT-2.1 are applicable to, among other things, adjacent transmission circuits that share a common right-of-way for a total of more than three miles, that are separated by less than 250 feet between centerlines, and that both operate at greater than or equal to 300 kV. See TPL-001-WECC-CRT-2.1, pt. A.4.2 (applying assessment requirement to "Adjacent Transmission Circuits"); WECC Glossary Terms Developed Using the WECC Reliability Standards Development Procedures (June 25, 2014) (defining "adjacent transmission circuits" as two transmission circuits separated by less than 250 feet between centerlines). The provisions of TPL-001- WECC-CRT-2.1 regarding "adjacent transmission circuits" would not apply to the B2H Project because the Proposed Action and Alternatives generally have been sited approximately 1,500 feet from existing transmission lines and would not meet the definition of "adjacent transmission circuits." Even so, TPL-001-WECC-CRT-2.1 is not a siting standard, and siting new transmission lines at the minimum separation distance necessary to avoid triggering an "adjacent transmission circuit" assessment under TPL-001-WECC-CRT-2.1 does not establish or guarantee reliable electric services for Idaho Power's customers or the transmission line's NERC/WECC rating. Idaho Power is obliged, as a federally- and state-regulated electric utility company, to construct and site new transmission facilities in a manner ensuring safe, reliable, adequate, and efficient electricity services. When deciding whether to site a new transmission line in or near an existing transmission line right-of-way, the impacts are carefully weighed against the risks. The risks includes: (1) the risk of cascading customer outages on a regional level due to multiple circuit, common right-of-way outage, (2) the risk of increased customer outages, and (3) the risk to the project rating (i.e., the capacity requirements of the project). The B2H Project is an essential part of Idaho Power's future plans to serve customers, provide new transmission capacity, and improve reliability of the existing system. Large transmission projects	Comment noted

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				like the B2H Project are intended to have long asset lives (>50 years). Therefore, it is crucial they are planned, sited, designed, and constructed to be reliable and deliver the performance for which they are being planned. At a minimum, the new transmission facilities must avoid a potential "common mode failure" (lines adjacent to each other on a common transmission tower or two parallel transmission lines in close proximity to each other). Common mode failures include, but are not limited to, a snagged shield wire from one line being dragged into the adjacent line, an aircraft flying into more than one line, smoke from a fire across the right-of-way shorting out more than one line, lightning strikes affecting more than one line, high winds, dust storms, ice storms, blizzards, landslides, earthquakes, vandalism, and equipment failure. As a minimum requirement, NERC/WECC reliability performance standards require that a multiple contingency analysis (an analysis of the simultaneous failure of two lines) be performed to evaluate the impact resulting from the loss of multiple transmission lines to the remaining transmission system. See NERC Reliability Standard TPL-004-0(i)a. When transmission lines are sufficiently separated from each other, common mode failures do not pose a risk and prudent planning requires evaluation of one line out of service at a time and not a two-line outage. NERC/WECC standards leave the responsibility to the transmission line owner to avoid common mode failures and ensure reliable services. Utilities are expected to use their history of experience and prudent judgment in planning, siting, and design of transmission systems to ensure the reliability of the interconnected grid. Idaho Power has determined that a 1,500-foot minimum separation between the B2H Project and existing 230-kV and 500-kV transmission lines is sufficient to address potential reliability impacts and reductions in transfer capabilities. The 1,500-foot minimum separation distance has been determined to be reasonable and consistent with regional conditions for similar transmission projects. In fact, BLM as recently as April 2013 approved a 1,500-foot separation distance for the Gateway West transmission line project in Idaho. In the Final EIS for the Gateway West project, BLM discussed the 2012 amendments to TPL-001-WECC-CRT—which had been issued after the SF-299 was submitted—and found the 1,500-foot separation distance to be "reasonable and consistent with regional conditions." See Gateway West Final EIS at 1-24 (Apr. 2013). The regulations codified at 43 C.F.R. § 2804.10(a) provide that the FLPMA right-of-way pre- application meetings will be used to identify potential routing constraints, including BLM requirements to use rights-of-way in common and right-of-way corridors to address environmental concerns and the proliferation of separate rights-of-way. See 70 Fed. Reg. 20970, 20970-71 (Apr. 22, 2005). Here, the minimum separation distance was properly addressed during the pre-application phase of the B2H Project, resulting in the 1,500-foot separation distance provided in the Proposed Action and Alternatives set forth in the Draft EIS. Therefore, the 1,500-foot minimum separation distance proposed here would be reasonable, consistent with BLM's prior decisions on similar projects, and supported by the administrative record.	
2.2.7 Proposed Action/ Right-of-Way Acquisition	p. 2-10	21 and 22	…steel lattice towers and H-frame structures for 500-kV circuits and monopoles for 138/69-kV 21 circuits.	Need to include 230-kV structure type of steel H-frame.	Revised
2.2.7 Proposed Action/ Right-of-Way Acquisition	p. 2-10	24 and 25	The majority of the proposed transmission line circuits would be supported by single-circuit steel lattice towers.	Suggest adding the term "500-kV" to describe the types of circuits that would mostly be comprised of single-circuit steel lattice towers. The project also includes 69 and 138-kV structures, which will not involve single-circuit steel lattice towers. Consider rewording the statement as follows: "The majority of the proposed 500-kV transmission line circuits would be supported by single-circuit steel lattice towers."	Revised

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2.2.8.1 Proposed Action/Project Facilities/Transmission Line Components	p. 2-17	6	…the top two conductors and the lower conductor (see Table 2-2).	Refer the reader to Figure 2-2, not Table 2-2.	Revised
2.2.8.3 Proposed Action/Project Facilities/Ancillary Facilities	p. 2-19	6 and 7	The project would also require a geotechnical investigation within the right-of-way to prepare final design and engineering plans for the project.	This sentence should be amended to better describe the relationship between the geotechnical investigation and the ancillary facilities. Consider the following changes: "~~The project would also require~~ Prior to construction, a geotechnical investigation ~~within the right-of-way to prepare final design and engineering plans for the project~~ would be completed to identify the final design and location of the transmission towers and ancillary facilities (see pp. 2-30 to 2-31)."	Revised
2.2.8.3 Proposed Action/Project Facilities/Ancillary Facilities	p. 2-19	18-19	A prefabricated concrete communications shelter with dimensions of approximately 12 feet by 32 feet by 12 feet tall will be placed on the site.	The height of the shelter would be nine and not 12 feet. The sentence should read "A prefabricated concrete communications shelter with dimensions of approximately 12 feet by 32 feet by 9~~12~~ feet tall will be placed on the site."	Revised
2.2.8.3 Proposed Action/Project Facilities/Ancillary Facilities	p. 2-19	21-23	Communications sites would consist of a communications shelter (building) and an emergency generator with a liquid petroleum gas fuel tank and impermeable liner, a fenced yard, an access road, 22 and distribution power supply from the local distribution system.	An impermeable liner would not be used here because the tank would contain compressed liquid petroleum gas, which if released from the tank immediately assumes atmospheric pressures and turns to a gas. Nothing would ever leak onto the ground, thus, installing an impermeable liner would serve no purpose. The reference to "impermeable liner" should be deleted.	Revised
2.2.8.3 Proposed Action/Project Facilities/Ancillary Facilities	p. 2-20	18	Depending on agency or landowner preference, gates may be installed at fence crossings and other locations, as requested, to restrict unauthorized vehicular access to the right-of-way.	Circumstances may exist where gates cannot be installed or locked, despite the agency's or landowner's preference (e.g., a dedicated county public road located on private land). Amend the sentence to recognize that not all requests for road closure may result in a locked gate: "Depending on agency or landowner preference and subject to existing access rights, construction limitations, or regulations, gates may be installed at fence crossings and other locations, as requested, to restrict unauthorized vehicular access to the right-of-way."	Revised
2.2.8.4 Proposed Action/Project Facilities/Project Construction	p. 2-29	6-18	The Construction POD would be developed by the Applicant in collaboration with the Agency Interdisciplinary Team and cooperating agencies consisting of federal, state, and county agencies having jurisdictional or regulatory responsibilities and/or specialized knowledge for the project. Although the federal agencies do not have authority over state or private land, the federal agencies have an obligation to disclose in the EIS the consequences of their decisions on nonfederal land. It is anticipated that the provisions of the POD would be applied consistently to state, private, and federal land, unless otherwise indicated by the state and by private landowners and documentation of the state or landowner decision(s) is provided to the compliance inspection contractor. Participation in	BLM correctly identify that it does not have authority over the nature or scope of the Project on private or state land, pursuant to NEPA or FLPMA, stating "the federal agencies do not have authority over state or private land." However, the statement that the POD provisions will apply to state and private land "unless" the state or private landowner decide otherwise incorrectly establishes the status quo as being that BLM's decision-making in the ROD would apply to state and private land. Rather, the status quo on private or state land is that BLM does not have authority over the nature or scope of the Project, and the provisions of the ROD would apply on private or state land only if the state or private landowner requires the same. Additionally, the statement that BLM has an obligation to enforce certain federal laws "regardless of land jurisdiction or ownership" seemingly perpetuates the incorrect assumption that BLM is determining the nature or scope of the Project on private and state land through BLM's right-of-way decisions here, which BLM is not doing. To the extent certain federal laws may apply to activities on state or private lands, those laws speak for themselves and it is unnecessary to paraphrase those laws in this section of the EIS. The paragraph should be amended to properly describe the jurisdictional and decision-making relationships among the federal agencies, the states, and private landowners: "The Construction POD would be developed by the Applicant in collaboration with the Agency Interdisciplinary Team and cooperating agencies consisting of federal, state, and	The text revisions were made regarding application to public and state lands. The text regarding the obligation of federal agencies to enforce requirements remains as it is because it is a correct statement and should be clearly stated as such.
			the development of the POD by state and county cooperating agencies would give them the opportunity to concur with and adopt the terms and conditions of the POD to facilitate state and county licensing or permitting. The federal agencies have an obligation to enforce the requirements of the National Historic Preservation Act and the Endangered Species Act to protect important historic properties and threatened and endangered species, respectively, regardless of land jurisdiction or ownership.	county agencies having jurisdictional or regulatory responsibilities and/or specialized knowledge for the project. Although the federal agencies do not have authority over state or private land, the federal agencies have an obligation to disclose in the EIS the consequences of their decisions on nonfederal land. ~~It is anticipated that t~~The provisions of the POD would be applied ~~consistently~~ to state land, private land, or both ~~and federal land, unless otherwise indicated~~ only if required by ~~the~~ state law ~~and~~ or ~~by~~ private landowner~~s~~ right-of-way negotiations ~~and documentation of the state or landowner decision(s) is provided to the compliance inspection contractor~~. Participation in the development of the POD by state and county cooperating agencies would give them the	The text revisions were made regarding application to public and state lands. The text regarding the obligation of federal agencies to enforce requirements remains as it is because it is a correct statement and should be clearly stated as such.

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				opportunity to concur with and adopt the terms and conditions of the POD to facilitate state and county licensing or permitting. ~~The federal agencies have an obligation to enforce the requirements of the National Historic Preservation Act and the Endangered Species Act to protect important historic properties and threatened and endangered species, respectively, regardless of land jurisdiction or ownership~~."	
2.2.8.4 Proposed Action/Project Facilities/Project Construction	p. 2-29	19-21	For this project, a POD that is based on information and data carried forward from the EIS would be required as a condition of signing the ROD. This POD would be incorporated by reference into the ROD issued based on the analysis in this EIS.	This paragraph should clarify that issuance of the Construction POD generally would not require an EA or EIS independent of the ROD EIS. *See* 40 C.F.R. § 1502.9(c)(1). Consider amending this paragraph to include that information: "For this project, a POD that is based on information and data carried forward from the EIS would be required as a condition of signing the ROD. This POD would be incorporated by reference into the ROD issued based on the analysis in this EIS. Any refinements in the Construction POD that are consistent with the impact analysis in the Final EIS would not require a supplement EIS." *See* Sigurd-to-Red Butte No. 2 345-kV Transmission Project Final EIS, at 2-15 (Oct. 2012) (similar provision).	Revised
2.2.8.4 Proposed Action/Project Facilities/Project Construction	p. 2-30	14-15	Additionally, fueling trucks, maintenance trucks, and operations crews would be based in the fly yards.	The identified trucks and crews would be located in the staging areas and not the fly yards. This sentence should read "Additionally, fueling trucks, maintenance trucks, and operations crews would be based in the ~~fly yards~~ staging areas."	Revised
2.2.8.4 Proposed Action/Project Facilities/Project Construction	p. 2-30	25-26	Preliminary design has provided indicative locations for roads and staging areas along the entire Proposed Action.	This section addresses staging areas and not fly yards. This sentence should read "Preliminary design has provided indicative locations for roads and ~~fly yards~~ staging areas along the entire Proposed Action."	Revised
2.2.8.4 Proposed Action/Project Facilities/Project Construction	p. 2-31	6-7	About 70 boreholes would be spaced approximately 4 miles apart.	The geotechnical investigation sites would occur every 3 and not 4 miles apart. Amend the sentence to read: "About 70 boreholes would be spaced approximately 3 miles apart."	Revised
2.2.8.4 Proposed Action/Project Facilities/Project Construction	p. 2-38	31-32	An emergency generator with a liquid petroleum gas fuel tank with an impermeable liner would also be installed at the site inside the fenced area.	An impermeable liner would not be used here because the tank would contain compressed liquid petroleum gas, which if released from the tank immediately assumes atmospheric pressures and turns to a gas. Nothing would ever leak onto the ground, thus, installing an impermeable liner would serve no purpose. The reference to "impermeable liner" should be deleted.	Revised
2.2.9 Proposed Action/Project Facilities/Design Features	p. 2-44	8-12	The design features have been compiled from several sources, including the . . . best management practices from agency resource management plans. . . .	BLM should consider the relevant design features set forth in the relevant land use plans, if any, in addition to the best management provisions. The sentence should be amended to provide that BLM considered both best management practices *and* design features, if applicable: "The design features have been compiled from several sources, including the . . . design features and best management practices from agency resource management plans . . . ."	Revised
2.2.10 Proposed Action/Project Facilities/Mitigation	p. 2-45	10	…reduce or eliminate over time, compensate)-as identified by the…	Remove closed parenthesis after "compensate."	Revised
2.3 Alternatives Development	p. 2-47	4-11	NEPA and its implementing regulations require the BLM and USFS to develop a range of reasonable alternatives to the proposed B2H Project to address ." . . unresolved conflicts concerning alternative uses of available resources" (NEPA Section 102(2)(E)). The Council on Environmental Quality Forty Most Asked Questions Concerning CEQ's NEPA Regulations provide that "reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant" (1981:Question 2a). The BLM and USFS developed alternatives to the proposed B2H Project to address resource issues (Figure 2-11).	BLM should clarify that, while unresolved resource conflicts give rise to a requirement that an agency consider appropriate alternatives pursuant to NEPA Section 102(2)(E), the purpose and need statement—and not what is required to address unresolved resource issues—defines the range of reasonable alternatives. *See* BLM NEPA Handbook § 6.6.1. Consider the following amendments to this discussion: "NEPA ~~and its implementing regulations~~ requires the BLM and USFS to ~~develop a range of reasonable alternatives to the proposed B2H Project to address~~ "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources unresolved conflicts concerning alternative uses of available resources" (NEPA Section 102(2)(E)). The Council on Environmental Quality Forty Most Asked Questions Concerning CEQ's NEPA Regulations provide that "reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant" (1981:Question 2a). Additionally, determining whether an alternative is "reasonable" should be made in	The first text edits are incorporated. The last sentence regarding "reasonable" alternatives was not added because there are other factors that determine reasonability.

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				reference to the purpose and need for the action. The BLM and USFS developed alternatives to the proposed B2H Project ~~to address resource issues~~ (Figure 2-11)."	
2.3.1 Alternatives Development/Segment 1	p. 2-51	Entire Segment 1 Section	n/a	As discussed in more detail in the cover letter to Idaho Power's comments on the Draft EIS, the Grassland and Horn Butte substations do not meet Idaho Power's objectives and the Longhorn Substation is the only substation discussed in the Draft EIS that would meet the objectives. Therefore, Idaho Power does not support the Grassland and Horn Butte routes. Rather, Idaho Power prefers a west of Bombing Range Road route variation for Segment 1. However, if the Navy declines Idaho Power's right-of-way request, Idaho Power supports the Longhorn Alternative or Longhorn Variation because each of the routes provides access to the Longhorn Substation.	Comment noted
2.3.1.1 Alternatives Development/Segment 1/Horn Butte Alternative	p. 2-51	12-13	The undeveloped area within the substation yard would allow future users to tie into the B2H or Boardman to Slatt line.	The Proposed Horn Butte station site was planned for B2H and not provide for third-party tie-ins.	Text deleted
2.3.1.1 Alternatives Development/Segment 1/Horn Butte Alternative	p. 2-54	13-15	The terms of the approach zone easement limit structure heights within the easement to a maximum of 35 feet above grade; this height limitation may affect the design of structures in the easement area, unless Idaho Power can reach agreement with the Department of the Navy for taller structures.	This sentence should recognize that the Navy has indicated to Idaho Power that the Navy would allow structures up to 100 feet, despite the approach zone easements. "The terms of the approach zone easement limit structure heights within the easement to a maximum of 35 feet above grade; this height limitation may affect the design of structures in the easement area, unless Idaho Power can reach agreement with the Department of the Navy for taller structures. The Navy has indicated to Idaho Power that a maximum tower height of 100 feet above ground level would be allowed on lands subject to the approach zone easements."	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
2.3.1.2 Alternatives Development/Segment 1/ Longhorn Alternative	p. 2-54	17-18	The Longhorn Substation would be located on BPA-owned land just west of the Port of Morrow due north of the Boardman Bombing Range road, about 0.25 to 0.5 mile north of I-84 (point MO4 in Figure 2-14).	The Longhorn Substation would be located east of the Port of Morrow, not west. "The Longhorn Substation would be located on BPA-owned land just ~~west~~east of the Port of Morrow due north of the Boardman Bombing Range road, about 0.25 to 0.5 mile north of I-84" (point MO4 in Figure 2-14).	Revised
2.3.1.3 Alternatives Development/Segment 1/ Longhorn Variation	p. 2-54	31-32	While the centerline of the Longhorn Variation would not extend onto training facility, the right-of- way would.	The East of Bombing Range Road right-of-way would not extend onto the training facility property. This sentence should read "~~While the centerline of the Longhorn Variation would not extend onto training facility, the right-of-way would~~ The Longhorn Variation right-of-way would be immediately adjacent to but not extend over the east boundary of the training facility property."	Revised
2.3.1.3 Alternatives Development/Segment 1/ Longhorn Variation	p. 2-55	1-2, 3	At MP 1.5, the route begins 1 to parallel a 138-kV transmission line located to the east of Bombing Range Road. The Longhorn Variation and the existing 138-kV transmission line would be separated by 125 feet.	The line east of Bombing Range Road is 115-kV and not 138-kV. Correct the following statements as noted: "At MP 1.5, the route begins 1 to parallel a ~~138-kV~~115-kV transmission line located to the east of Bombing Range Road. The Longhorn Variation and the existing ~~138-kV~~115-kV transmission line would be separated by 125 feet."	Revised
2.3.1.3 Alternatives Development/Segment 1/ Longhorn Variation	p. 2-55	13-15	At MP 3.0, where the Longhorn Variation is adjacent to the Naval Weapons System Training Facility, structures would consist of 98-foot-tall self-supported tubular steel H-frame structures with a weathering steel finish.	This statement should provide additional detail regarding the height of the foundations in order to clarify that the total height of the structures would be 100 feet: "At MP 3.0, where the Longhorn Variation is adjacent to the Naval Weapons System Training Facility restricted airspace zone R5701A, structures would consist of 98-foot-tall self-supported tubular steel H-frame structures with a weathering steel finish on concrete foundations with no more than a 2' reveal above ground level."	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
2.3.2.1 Alternatives Development/Segment 2/ Glass Hill Alternative	p. 2-57	7-9	The Glass Hill Alternative was developed to address concerns about the Proposed Action's proximity to the Ladd Marsh Wildlife Management Area and concerns about the visibility of the transmission line from La Grande in Union County.	The statement that the Glass Hill Alternative was developed to avoid visual impacts to La Grande and the Ladd March Wildlife Management Area, without mentioning the myriad of additional considerations that went into the route's development, is incomplete. The Proposed Action and Glass Hill Alternative were developed in response to multiple competing landowner, environmental resources, visual impact, and constructability considerations identified during the CAP process and NEPA scoping. *See* Supplemental Siting Study (June 2012). Revise the text as follows: "The Glass Hill Alternative and Proposed Action ~~was~~ were developed ~~to address concerns about the Proposed Action's proximity to the Ladd Marsh Wildlife Management Area and visibility~~	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.

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				~~concerns from La Grande in Union County~~ in response to multiple competing landowner, environmental resource, visual impact, and constructability considerations identified during the CAP process and NEPA scoping. *See* Supplemental Siting Study (June 2012). The Glass Hill Alternative is approximately 7.5-miles-long located to the west of the Proposed Action on private land in Union County near La Grande, Oregon. The Glass Hill Alternative is the same length as the Proposed Action."	
2.3.3.1 Alternatives Development/Segment 3/ Timber Canyon Alternative	p. 2-59	4	Timber Canyon Alternative	Idaho Power opposes the Timber Canyon Alternative. The Timber Canyon Alternative is 15.3 miles longer than the Proposed Action, possibly requiring additional structures and roads and resulting in related resource impacts, including economic impacts regarding construction and maintenance. The terrain is more mountainous along the Timber Canyon Alternative than it is on the other Segment 3 Alternatives or the Proposed Action, increasing impacts related to construction of structures and roads on steep slopes. The Timber Canyon Alternative route is more forested than the Proposed Action or other Segment 3 Alternatives, requiring more forest-clearing and stream crossings. As a result, in comparison to the Proposed Action and other Segment 3 Alternatives, the Timber Canyon Alternative possibly would involve more direct, indirect, or cumulative impacts to fish, vegetation, wildlife, surface waters or other resources. *See, e.g.*, Draft EIS at 2-72, 3-893, 3-1031.	Comment noted
2.3.6 Alternatives Development/No Action Alternative	p. 2-66	10-12	If no action is taken, the BLM would not grant a right-of-way and the USFS would not authorize a special-use permit for the project to cross federal lands and the transmission line and ancillary facilities would not be constructed on federal lands.	The No Action Alternative discussion should address the additional reasonably foreseeable outcomes involving the proposed resource management plan amendments, the objectives of the 2009 MOU signatories, and Idaho Power's objectives by adding the following information: "Under the No Action Alternative, the B2H transmission line project would not be constructed. No RMPs would need to be amended if the No Action Alternative is selected. Additionally, the objectives of signatories to the 2009 MOU to accommodate additional electrical generation capacity, improve reliability, and reduce congestion by expanding and modernizing the transmission grid through the B2H Project would not be met. Additionally, Idaho Power's objectives for the Project, which include providing additional capacity to connect the Pacific Northwest region with the Intermountain region of southern Idaho to alleviate existing transmission constraints between the two areas and to ensure sufficient capacity so that Idaho Power can meet present and forecasted load requirements (as described in Section 1.4, Idaho Power's Objectives for the Project), would not be met."	Revised as suggested with exception to the following sentence "No RMPs would need to be amended if the No Action Alternative is selected."
2.4.2.3 Alternatives Considered but Eliminated from Detailed Analysis/Bury the Transmission Line	p. 2-68	15	n/a	Idaho Power agrees with BLM's decision to eliminate from detailed analysis an alternative for burying the transmission line. As the Draft EIS discusses, the costs of underground high voltage transmission lines are considerably higher than overhead lines and the surface impacts related to the burying and maintaining underground lines far exceed surface impacts for overhead lines. Not surprisingly, underground high voltage transmission is a minimally-utilized option in the electric transmission industry. Therefore, Idaho Power supports BLM's decision that undergrounding the Project would be technically and economically infeasible.	Comment noted
2.5.2 Summary Comparison of Alternatives/Agency Preferred Alternative	p. 2-71	3-5	The Agency Preferred Alternative is the alternative which the BLM, in coordination with the cooperating agencies, believe would fulfill its statutory mission and responsibilities, giving consideration to 4 economic, environmental, technical, and other considerations.	Add an "s" on the end of "believe" to read: "The Agency Preferred Alternative is the alternative which the BLM, in coordination with the cooperating agencies, believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other considerations."	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Chapter 3 Affected Environment and Environmental Consequences					
Chapter 3 Affected Environment and Environmental Consequences	Entire Chapter	n/a	B2H Project, Proposed Action, Proposed Action and alternatives, analysis area	In certain sections of the document, the Draft EIS uses the terms "B2H Project," "Proposed Action," "Proposed Action and alternatives," and "analysis area" interchangeably. However, the use of the terms generally is mutually exclusive. Consider applying the terms consistently and using consistent capitalization approaches throughout the document.	Revised; the Boardman to Hemingway Transmission Line Project is now consistently referred to as "B2H Project." Also, the text has been clarified so that "B2H Project area" refers to the entire project area and "study corridor" (rather than "analysis area") refers to the area inventoried or analyzed for a particular resource.
Chapter 3 Affected	Entire Chapter	n/a	Analysis area	When discussing environmental consequences, the resource sections	The term "study corridor" (rather than "analysis area") has been used in

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Environment and Environmental Consequences				should identify and refer to the specific analysis area for the relevant resource and not use the general term "analysis area" without context.	the Final EIS to refer to the area inventoried or analyzed for a particular resource. For more information, refer to Table 2-8 in Chapter 2 of the EIS, which describes the study corridor for each resource.
Chapter 3 Affected Environment and Environmental Consequences	Entire Chapter	n/a	Presentation of resource impact assessment methodology	The presentation of the impact assessment for each resource should be consistent across the resource sections. Currently, each resource section addresses the environmental consequences sections differently. Some discuss initial impacts, some discuss effects common to all, but don't mention that they are initial impacts. Each resource section should present the impact assessment, and apply the same, in the order outlined in Section 3.2 on page 3-8: (1) assessment of initial impacts, (2) application of design features, (3) description of residual impacts, and (4) mitigation.	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Chapter 3 Affected Environment and Environmental Consequences	Entire Chapter	n/a	Right-of-way, right of way, ROW	The document uses the terms "right-of-way," "right of way," and "ROW" throughout the document. While each of the terms may be interchangeable, consider using only one of the terms to maintain consistence. For ease of the reader, consider spelling out the term rather than using an abbreviation. We suggest using "right-of-way" throughout the document.	The term "ROW" has been spelled out as "right-of-way" throughout the document and the acronym has been eliminated.
Chapter 3 Affected Environment and Environmental Consequences	Entire Chapter	n/a	Acronyms	Consider reviewing the document to ensure that each acronym is defined in the text and that the acronym is not defined more than once. Multiple acronyms are defined multiple times throughout Chapter 3—e.g., Endangered Species Act.	Revised
Chapter 3 Affected Environment and Environmental Consequences	Entire Chapter	n/a	References	Confirm that each reference cited in the text is included in the references cited list of Chapter 6. Many references cited in Chapter 3 were not included in Chapter 6.	The citations in the text have been cross-checked with and references and references have been added as appropriate.
Chapter 3 Affected Environment and Environmental Consequences	Entire Chapter	n/a	Commas	Check comma use throughout the Chapter, specifically for numbers in the thousands (e.g., 1,000 instead of 1000).	Revised
Chapter 3 Affected Environment and Environmental Consequences	Entire Chapter	n/a	Data Citations	There are numerous instances throughout Chapter 3 where the document does not include a citation to the data supporting the analysis. Each data reference or analysis section relying on data needs to include a citation to the relevant data and an explanation of how the data supporting the conclusion.	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS.
Chapter 3 Affected Environment and Environmental Consequences	Noise Section	n/a	n/a	Noise impacts from transmission line projects generally are not considered public health or safety issues, and including the noise section in the "Public Health and Safety" section improperly suggests that there is link. Therefore, the noise discussion should be extracted from the Public Health and Safety section and should appear under its own subsection in Section 3.2 of the Final EIS.	Discussion of noise impacts remains in the Public Health and Safety section for consistency with BLM guidance and the approved EIS outline. Inclusion of noise in this section is appropriate in order to reflect the potential for effects on human health and safety.
Section 3.1 Introduction					
3.1 Introduction	p. 3-1	32	n/a	The Final EIS should clarify that the discussion of impacts to non-federal lands as part of the NEPA process does not provide or suggest that the federal agencies are asserting authority over siting or construction requirements on non-federal lands. Consider including the following discussion regarding the same, which is substantially to the discussion set forth in BLM's Final EIS for the Gateway West project, at 3.1-1: "Although the federal agencies have no authority to either permit or prohibit construction of the Project on non-federal land, NEPA requires an analysis of project effects on all lands, not just the effects to federal lands. Therefore, the EIS makes assumptions on where the Project would be sited on non-federal lands and on how it would be designed and constructed. This is not meant to imply that the federal agencies are authorizing the Project on non-federal lands. Decisions on siting and construction requirements on non-federal lands are under the authority of state and local governments, and not the federal agencies." See also Sigurd to Red Butte No. 2 345-kV Transmission Project Final EIS at 2-15 (Oct. 2012). ("It should be noted that BLM and USFS do not have authority to enforce mitigation measures on state and private lands.").	Suggested text added to Section 3.1.1.2 Overview
3.1.1.2 Introduction/ Affected Environment/ Overview	p. 3-2	18	Places important to tribes are existing portions of the Oregon Trail and associated sites.	This statement suggests that the Oregon Trail and associated sites are the only places important to the tribes, while there may be other areas important to them. Consider amending the sentence to read: "Places	Revised

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				important to tribes ~~are~~include existing portions of the Oregon Trail and associated sites."	
3.1.1.2 Introduction/ Affected Environment/ Overview	p. 3-4	17-18	Rivers and streams drain to the Powder River, a major tributary of the Snake River.	There is no mention of the Burnt River which is a major drainage of the southern portion of Segment 3, there is also no mention of the Burnt River in Segment 4. The Burnt River is an important reference for the Project and should be include in the overview description of the Projects location. Approximately 33 miles of the proposed alternative and about 20 miles of NEPA alternatives are located within the Burnt River Drainage.	Revised
3.1.2.1 Introduction/ Environmental Consequences/Definitions	p. 3-5	29-33	For purposes of this EIS, the time frame for a short-term effect is approximately 3 years (the planned 24- to 30-month construction period, plus a 6- month postconstruction reclamation and restoration period). Long-term impacts result from ongoing activities or impacts that persist for long periods of time. For the purposes of this EIS, the time frame for a long-term effect is greater than 3 years (generally the period of project operations).	Six months is not a sufficient timeframe for ground-disturbance reclamation and restoration projects to become established. For example, for re-seeding projects, six months does not constitute even one growing season, making it unlikely that the results of the project will become apparent in that time. Consider using 5 years following construction as the measure for short-term impacts in order to allow reclamation and restoration projects to become established and return the affected environment to pre- construction conditions. The five year timeframe would allow a more accurate representation of the impacts that would be temporary and related to construction, and the long-term impacts that would endure for the life of the project. Consider changing the definition of short-term and long-term impacts as follows: "In this analysis, temporary environmental effects predicted to occur during Project construction that would be anticipated to return to a preconstruction condition at or within 5 years of the end of construction were considered short-term impacts. Environmental effects that would be anticipated to remain for the life of the Project were considered long-term impacts." *See* Sigurd to Red Butte No. 2 345-kV Transmission Project Final EIS at 3-15 (Oct. 2012) (using substantially the same definition of short-term and long-term impacts, including the 5-year post-construction timeframe).	The time frames for short- and long-term effects are clarified in the Final EIS.
3.1.2.1 Environmental Consequences/Definitions	p. 3-5	22-23	Indirect impacts are those impacts caused by the action that occur farther away from the area of activity or are later in time.	The definition of "indirect effects" should include the regulatory limitation that such effects must be reasonably foreseeable. *See* 40 C.F.R. § 1508.8(b). Consider the following amendment: "Indirect impacts are those impacts caused by the action that occur farther away from the area of activity or are later in time, but that are still reasonably foreseeable."	Revised
3.1.2.1 Introduction/ Environmental Consequences/Definitions	p. 3-5	33-35	Permanent impacts result in a permanent change in condition or function of the resource being addressed that would persist even after project operations cease and decommissioning is completed.	The definition of "permanent impacts" stated here is not adhered to throughout the document. Review its usage and modify text accordingly. For example, page 3-38 line 6 states "…construction of permanent structures, such as transmission line towers…." How can a tower structure be permanent if permanent is defined as persisting beyond decommissioning (i.e., tower removal)?	Revsied
3.1.2.1 Introduction/ Environmental Consequences/Definitions	p. 3-6	1-5	Effects of the B2H Project may also be cumulative with the effects of other actions. Cumulative effects are defined in the Council on Environmental Quality regulations as ." . . the impact on the environment which results from the incremental impact of the proposed action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non- Federal) or person undertakes such actions" (40 CFR 1508.7).	The regulation codified at 40 C.F.R. § 1508.7 was misquoted as follows: "Effects of the B2H Project may also be cumulative with the effects of other actions. Cumulative effects are defined in the Council on Environmental Quality regulations as '. . . the impact on the environment which results from the incremental impact of the ~~proposed~~ action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions' (40 CFR 1508.7)."	Revised
3.1.2.1 Introduction/ Environmental Consequences/Definitions	p. 3-6	6-24		Consider using the regulatory definitions of "significance," "context," and "intensity." The current description of those terms is incomplete. We suggest that lines 6 through 24 be deleted and in their place the following discussion would be inserted: "Determining the potential significance of forecast effects is relevant to describing the magnitude of the effects. Such a determination requires consideration of both the context and intensity of project effects. *See* 40 C.F.R. § 1508.27. With respect to context, 'significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality.' *Id.* § 1508.27(a). In the context of a site-specific action, 'significance would usually depend upon the effects in the locale rather	The BLM believes reference to the CEQ regulations is sufficient.

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				than in the world as a whole.' *Id.* Both short- and long-term effects are relevant to a determination of significance. *See id.* 'Intensity' refers to the severity of the impact. The CEQ Regulations list the following ten factors that should be considered in evaluating intensity: (1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial. (2) The degree to which the proposed action affects public health or safety. (3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. (4) The degree to which the effects on the quality of the human environment are likely to be controversial. (5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. (6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. (7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts. (8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural or historical resources. (9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. (10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for protection of the environment."	
3.1.2.2 Introduction/ Environmental Consequences/Impact Assessment	p. 3-6	18-23	A number of standards and best management practices to avoid and minimize effects on resources are also included in this Draft EIS. For the B2H Project, these protective measures are collectively called "design standards" and include environmental protection measures from the 2011 Revised Plan of Development, agency best management practices, interagency operating procedures from the West-Wide Energy Corridor Records of Decision (BLM 2009; USFS 2009), and standards and practices from agency handbooks and manuals and other sources	BLM should consider the relevant design features set forth in the relevant land use plans, if any. The Final EIS should identify the design features from the Baker Resource Management Plan (1989), Owyhee Resource Management Plan (1999), Southeastern Oregon Resource Management Plan (2002), Wallowa-Whitman National Forest Land and Resource Management Plan (1990), or other land use plan included in the analysis. However this paragraph is changed, it should be reflected in Section 2.2.9 (page 2-44, line numbers 8-12) for consistency.	This comment refers to text in the Draft EIS that has been modified in the Final EIS based on other specific comments on the Draft EIS or other overarching changes made since the Draft EIS. This comment has been addressed in the Final EIS.
Section 3.2.1 Earth Resources					
3.2.1 Earth Resources	Entire Section	n/a	n/a	Not all references cited in Section 3.2.1 appear in Chapter 6's list of references. Include in Chapter 6 each reference cited in the document.	References have been added. The citations in the text have been cross-checked with and references and references have been added as appropriate.
3.2.1.1 Earth Resources/ Introduction	p. 3-11	13	Geological hazards, soils, minerals, and paleontological resources occur, with little variation, throughout the B2H Project area;	This statement is inaccurate. There is quite a bit of variation in the geological hazards, soils, minerals, and paleontological resources throughout the B2H Project area. Also, the affected environment discussion for each earth resource is discussed by the analysis area, which is defined for each earth resource. Consider deleting the sentence.	The statement has been deleted.
3.2.1.1 Earth Resources/ Introduction	p. 3-11	n/a	n/a	It would be useful for the reader if a definition of a geologic hazard is provided and then briefly define the hazards (faults, seismicity, steep terrain, landslides, floods, subsidence) in the beginning of this section as is done for minerals (p. 3-14 lines 34- 36, and p. 3-15 lines 1-2). As written, the definitions of topics is scattered throughout the section; consider consolidating or being more consistent with where the definitions are presented.	The definitions of each hazard are now provided.
3.2.1.2 Earth Resources/ Regulatory Framework	p. 3-11	25	n/a	Consider whether BLM or USFS land use plans provide guidance relative to geological hazards and include the same in the Final EIS, if applicable.	The land-use plans were reviewed.
3.2.1.2 Earth Resources/ Regulatory Framework	p. 3-12	21	n/a	Consider including BLM's Road Design Handbook, H-9113-1 (Oct. 21, 2011), among the guidance documents to be considered by BLM	Revised

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				related to road construction on federal lands.	
3.2.1.3 Earth Resources/ Issues Identified	p. 3-17	22	The area is composed of steep canyons, hills, valleys, and mountains that often experience seismic instability.	Suggest deleting the word "often," unless it is backed up by a data source. If there is support for the statement regarding frequency of such events, provide a citation in the following discussion regarding the issue.	Revised
3.2.1.4 Earth Resources/ Methodology	p. 3-18	25-29	The potentially affected area <u>used</u> for recorded historical earthquakes varies depending on earthquake magnitude. Using information from the seismology department at the University of Nevada at Reno as a guideline (Louie 1996), r<u>esource specialists established</u> a 25-mile radius of potential effect for earthquakes less than magnitude 6.0, a 50-mile radius for earthquakes from magnitude 6.0 to less than 7.0, and a 100-mile radius for earthquakes of magnitude 7.0 or greater.	Suggest deleting the word "used" as it distorts the meaning of the first sentence. Suggest using data from the USGS Earthquake Hazards Program for Oregon in addition to data source used (Nevada). Define "resource specialists." Otherwise, consider removing terms "resource specialists established," it makes is sound like someone other than the resource specialist wrote this section and is not consistent with the language in other resources sections. Consider a global change throughout this section regarding the same.	Revised; USGS earthquake database was used.
3.2.1.4 Earth Resources/ Methodology	p. 3-19	12	This environmental analysis considered two landslide databases.	Cite the databases and provide the reference in Chapter 6.	Landslide databases are now cited.
3.2.1.4 Earth Resources/ Methodology	p. 3-19	14	The 1996 OPS report	Spell out what "OPS" stands for.	Comment no longer relevant as National Pipeline Hazard Index is used in the Final EIS.
3.2.1.4 Earth Resources/ Methodology	p. 3-22	3-8	Paleontological Resources	Interviews with resource specialists are referred to elsewhere in the document, but not here. Consider identifying the paleontologists working on the B2H project. If no paleontologists were consulted, consider consulting with one or more BLM paleontologists. Identify the location of known paleontological sites affected by each alternative and used for comparative analysis. Paleontologists from the University of Oregon and College of Idaho were interviewed for information on fossil sites in the analysis area in support of the earth resources Resource Report. Consider addressing that information in this section of the EIS. Consider conducting addition research into the fossil record in the project area by examining the existing literature beyond the RMPs.	Comments noted. If localities have been found in the study area, they were mentioned. The types of fossils that are found in geological units crossed by the project also were discussed. Published literature was reviewed for types of fossils typically found in those geological uinits
3.2.1.4 Earth Resources/ Methodology	p. 3-22	4	<u>For this Draft EIS</u>, paleontological analysis is based on interviews with BLM Oregon and state paleontologists and on reviews of paleontological information at BLM Vale and Baker City Field Offices 5 (Pritchard 2011).	The term "For this Draft EIS" is unnecessary. Consider deleting the term.	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-22	10	This section describes the affected environment for the B2H Project as a whole.	Consider changing "B2H Project as a whole" to "analysis area."	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-22	25-35	Entire paragraph	Provide citations to support the information presented and provide the references in Chapter 6.	This section has been rewritten.
3.2.1.5 Earth Resources/ Affected Environment	p. 3-24	15-16	Landslides, including mudflows, mudslides…. Landslides are often triggered….	Consider move this description of a landslide to the Introduction as a definition.	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-27	2-5	The analysis area for soils extends one-half mile on either side of the Proposed Action and alternative centerlines; 50 feet on either side of the centerlines of new and existing roads; and 50 feet from the boundaries of substations, communications sites, staging areas and fly yards that fall outside the mile-wide analysis area for the transmission lines.	The scope of the analysis area for Earth Resources is set forth in Section 3.2.1.4 Methodology (p. 3-18), and it is not necessary to repeat it here. Consider deleting this paragraph.	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-27	12	Revegetation in these areas may be more difficult due to a lack of water.	Suggest rewording to "be more difficult unless irrigation water is provided."	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-27	17	The order Andisol is represented by a variety of soils with a predominantly volcanic or volcaniclastic origin.	The term "order Andisol" should read "Andisol order."	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-27	22-29 and 30-34	Both paragraphs in their entirety	Suggest moving both of these paragraphs to page 3-20 under "Erosion Potential" and "Soil T Factor."	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-29	1-4	Entire paragraph	Suggest moving this paragraph to page 3-20 under "Steep Slopes."	Revised
3.2.1.5 Earth Resources/	p. 3-29	11-19	The soil *T* factor… (entire paragraph). Soils with a	Suggest moving both of these paragraphs to page 3-20 under "Soil *T* factor" (with the exception of the	Comment no longer relevant. T factor was not included in the analysis in the Final EIS.

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Affected Environment			low *T* factor are more...of 2 tons per acre per year as a guideline.	last sentence of the second paragraph).	Comment no longer relevant. T factor was not included in the analysis in the Final EIS.
3.2.1.5 Earth Resources/ Affected Environment	p. 3-29	23	The NRCS defines arable land as land suitable for farming.	Suggest moving this sentence to page 3-20 and creating a heading for "Sensitive Soils" or "Arable Land" and describe methods.	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-30	12-13	The presence of stony or rocky soil could interfere with agricultural practices and complicate revegetation efforts.	Suggest deleting this sentence or moving it to the environmental consequences section.	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-31	2-3	Data for mineral resources, including spatial information, were obtained from BLM sources. BLM's LR-2000 database (http://www.blm.gov/lr2000) was also reviewed.	The identical two sentences appear on page 3-21, lines 20-21. Because these sentences are duplicative of those set forth in the prior pages and there is no reason to repeat the information here, the sentences should be deleted.	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-32	1-3	Mineral material disposal properties are located in Malheur and Owyhee Counties. Mineral products include tufa and specialty stone. Mineral resources in other portions of the analysis area are much less prevalent. The production status of the two identified oil and gas wells is unknown.	Consider incorporating these sentences into the preceding paragraph.	Revised
3.2.1.5 Earth Resources/ Affected Environment	p. 3-32	5-23	First two paragraphs in their entirety	Consider moving these two paragraphs to page 3-22 under Paleontological Resources.	Revised
Section 3.2.2 Water Resources					
3.2.2.2 Water Resources/Regulatory Framework	p. 3-57	18-20	The Idaho Department of Environmental Quality (IDEQ) has issued water quality standards that include a description of hydrologic units; a list of priority pollutants; and a list of water-quality- impaired streams within each subbasin, along with the parameters for which the stream is impaired	Provide a reference to the IDEQ document(s) that contain(s) this information.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-57	21-24	The Oregon Department of Environmental Quality (ODEQ) maintains water quality standards for groundwater and surface water for Oregon. Oregon standards include a classification system describing the highest beneficial uses, fish use designations, narrative and numeric criteria to support the beneficial uses, and antidegradation policies	Provide a reference to the ODEQ document(s) that contain(s) this information.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-57	24-26	The BLM and USFS have developed handbooks and instruction memoranda that provide best management practices to avoid erosion and the resulting contribution of sediments to waters of the United States.	Provide a reference to the BLM and USFS document(s) that contain(s) this information.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-57	28-32	Projects requiring a federal permit and involving any activity that may result in a discharge to navigable waters of the United States must obtain a Section 401 water quality certification to ensure compliance with state water quality standards. Any activity, including river or stream crossings during road, pipeline, or transmission line construction that may result in a discharge into a state waterbody must be certified by the IDEQ or ODEQ.	Section 401 applies to certain discharges into "navigable waters." 33 U.S.C. § 1341(a)(1). The term "navigable waters" means "waters of the United States, including the territorial seas." *Id.* § 1362(7). The Draft EIS reference to "navigable waters of the United States" seems to combine the two regulatory terms, creating confusion. The sentence should be amended to use the regulatory terms: "Projects requiring a federal permit and involving any activity that may result in a discharge to ~~navigable~~ waters of the United States must obtain a Section 401 water quality certification to ensure compliance with state water quality standards." The term "state waterbody" is not defined, and all waters are not considered "waters of the United States" for purposes of Section 401. Thus, the reference to "state waterbody" has created an ambiguity with respect to the scope of the 401 certification requirement. The sentence should be amended to avoid the ambiguity as follows: "Any activity, including river or stream crossings during road, pipeline, or transmission line construction that may result in a discharge into ~~a state waterbody~~ waters of the United States be certified by the IDEQ or ODEQ.	Comment noted. Reference to discharges to navigable waters have been removed. References to "state waters" have been removed. Language clarified to indicate discharges to "Waters of the United States."
3.2.2.2 Water Resources/Regulatory Framework	p. 3-57	30-31	Any activity, including river or stream crossings during road, pipeline, or transmission line construction	Pipeline construction is not proposed and is therefore irrelevant. Consider deleting the word "pipeline."	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-57	1-2	Section 402 pertains to point and nonpoint discharges to water resources which are regulated by the National Pollutant Discharge Elimination System	The Clean Water Act section 402 permit requirement does not apply to non-point source discharges. *See* 33 U.S.C. § 1342 (prohibiting unpermitted discharges of pollutants); *id.* § 1362(12) (defining	Revised

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			(NPDES) permit process.	"discharge of pollutant" to mean addition of pollutant by a point source). The sentence should be amended as follows: "Section 402 pertains to point source ~~and nonpoint~~ discharges to water resources which are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process."	
3.2.2.2 Water Resources/Regulatory Framework	p. 3-58	17-18	Section 404 authorizes the U.S. Army Corps of Engineers (USACE) to regulate the discharge of dredged or fill material to waters of the United States.	The authorization is limited to Section 404(a), not the entire section. Consider rewording the statement to read: "Section 404(a) authorizes the U.S. Army Corps of Engineers (USACE) to regulate the discharge of dredged or fill material to waters of the United States."	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-58	19-20	Road crossings of wetlands and waterbodies for the project may trigger Section 404 permit requirements.	Road crossings of wetlands and waterbodies per se do not trigger Section 404 permit requirements. Discharge of dredged or fill material (for road crossings or other purposes) into waters of the United States (which includes some but not all wetlands and waterbodies) trigger the requirements. Consider rewriting the sentence as follows: "Road crossings that result in discharge of dredged or fill material into the waters of the United States ~~of wetlands and waterbodies for the project~~ may trigger Section 404 permit requirements."	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-58	25-26	In compliance with the CWA, the IDEQ and the ODEQ have identified Section 303(d) water quality limited streams and lakes for development of TMDL criteria.	Provide references to the IDEQ and ODEQ documents that contain this information.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-60	2	Removal/Fill in Water	This heading is unclear and inaccurate. The Oregon Removal Fill law applies to waters of the state, not "in water" work.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-60	31-36	The Idaho Stream Channel Protection Act requires a stream channel alteration permit from the IDWR before beginning any work that will alter the stream channel. A stream channel alteration is defined as any activity that obstructs, diminishes, destroys, alters, modifies, relocates, or changes the natural existing shape or direction of water flow of any stream channel. This definition includes taking material out of the channel or placing material or structures in or across the channel where the potential exists to affect flow in the channel.	This paragraph defines stream channel alteration but it does not define stream channel. Add the following text: "Idaho Stream Channel Alteration Rule 37.03.07 defines stream channel as 'a natural water course of perceptible extent with definite beds and banks which confines and conducts continuously flowing water.' "	Comment noted. Revised text added.
3.2.2.2 Water Resources/Regulatory Framework	p. 3-62	25-26	Often, reviews conducted by other agencies USACE timelines.	This is an incomplete sentence and the intended meaning is not clear. Clarify the meaning of this statement.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-63	18	The roadside, irrigation, and ditches are generally not regulated.	The meaning of this sentence is not clear. It appears to be incomplete. Its accuracy cannot be determined as written. Clarify.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-63	28-32	The DSL must ensure that issuance of a removal-fill permit is not inconsistent with the "protection, conservation, and best uses of the water resources of the State" (Oregon Administrative Rule [OAR] 141-085-0565), states that the Project impacts on water resources will be the minimum necessary, and that the Project will not unreasonably interfere with the navigation, fishery, or public recreation of state-owned submerged waters.	There is a structural problem in this sentence between the OAR citation and "states." Consider reworking this sentence to correct the grammatical error.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-64	16-18	Local jurisdictions must submit a Wetland Land- Use Notice to the DSL within 5 days of receiving a land-use application on a parcel with wetlands. The DSL then responds to the local jurisdiction and applicant.	Idaho Power intends that the Oregon Department of State Lands Removal-Fill Permit requirements will be addressed through the EFSC site certificate process and not through an independent permit application process. The DSL-local-jurisdiction coordination procedures discussed in the Draft EIS contemplate an independent permitting process and are therefore inapplicable. This text should be deleted.	Revised
3.2.2.2 Water Resources/Regulatory Framework	p. 3-64	23-34	Timelines for processing individual permits from the DSL are divided into the following four steps. 1. The first step is the application review, when the DSL has 30 days to conduct the review and issue a letter documenting the completeness or lack thereof.	Idaho Power intends that the Oregon Department of State Lands Removal-Fill Permit requirements will be addressed through the EFSC site certificate process and not through an independent permit application process. The DSL permitting procedures discussed in the Draft EIS contemplate an independent permitting process and are	Revised

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			2. Following the acceptance of a complete application, a public review period of 30 days is required. A notice detailing the Project is sent to other agencies, adjacent property owners, and any others expressing an interest in the Project inviting comment on the application. 3. During the final 60-day review period, the applicant may respond to comments received in the public review process, submit additional information, or revise the project. 4. Following the final review period, the DSL either issues or denies the permit. If needed, the applicant may request an extension of the permit decision to resolve outstanding issues. Permits are valid for up to 5 years from the date of issuance.	therefore inapplicable. This text should be deleted.	
3.2.2.2 Water Resources/Regulatory Framework	p. 3-65	2-4	Oregon EFSC requires the submittal of a removal- fill permit. Issuance of the removal-fill permit occurs following the receipt of a complete application; DSL staff coordinates with EFSC during the permitting process.	Idaho Power intends that the Oregon Department of State Lands Removal-Fill Permit requirements will be addressed through the EFSC site certificate process and not through an independent permit application process. The DSL permitting procedures discussed in the Draft EIS contemplate an independent permitting process and are therefore inapplicable. This text should be deleted.	Revised
3.2.2.4 Water Resources/Methodology	p. 3-65	25	METHODOLOGY	This is a malapropism. This section is a description of methods used; not a study of the methods. The correct use is METHODS. "Methodology" is used incorrectly throughout the section.	Revised
3.2.2.4 Water Resources/Methodology	p. 3-66	14	An estimated 70 percent of sampled proposed crossings are ephemeral,	Provide a reference to substantiate this estimate.	Language removed
3.2.2.4 Water Resources/Methodology	p. 3-67	20-21	Everywhere in the analysis area, depths to groundwater are greater than 30 feet.	Consider the SSURGO data on the NRCS Web Soil Survey web site at http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx, which suggests that the following three locations may include groundwater within a few feet of the surface. There may be other similar locations. Coordinates are near but not necessarily in the soil units reported here. 45.140000, -117.970000, one mile north of Clover Creek interchange, Analysis Area includes mapped unit of Conley silty clay loam, map unit 9A, with NRCS depth to groundwater reported as 61 cm (2.0 feet). 44.832000, -117.749000, Baker Valley 5.5 miles northeast of Baker City, Analysis Area includes Stanflow-Umapine silt loams, 0 to 2 percent slopes (map unit 159A) water table at 92 cm (3 feet). 44.574000, -117.516000, Burnt River Canyon, Analysis Area includes Baldock silt loam, 0 to 2 percent slopes (map unit 13A), water table at 23 cm (0.75 foot); Powval silt loam, 0 to 3 percent slopes (map unit 126A), water table at 153 cm (5 feet); Riverwash (map unit 132A), water table at 31 cm (1 foot).	Comment noted. The section regarding shallow groundwater has been resourced and cited using USGS, Oregon Department of Water Resources well log locations and depth to groundwater data, and NRCS depth to groundwater data for soil mapping units crossed by the project centerline.
3.2.2.4 Water Resources/Methodology	p. 3-68	20-26	To determine the acreage of impacts that could potentially occur to wetlands, the proposed Project's disturbance footprint was combined with the wetland areas identified by the 2009 Oregon Wetland Cover dataset from the Oregon Biodiversity Information Center (previously known as the Oregon Natural Heritage Information Center) and The Wetlands Conservancy, along with those areas identified by the National Wetland Inventory (NWI) database for the portions of the B2H Project located in Oregon and in Idaho. Areas where construction or operations footprints were co- located with mapped wetlands were considered a direct impact and the acreage of impact was calculated via GIS analysis.	Confirm or correct citation. The referenced 2009 Oregon Wetland Cover data set can't be located with an internet search, on the OBIC or TWC web sites. TWC directs to the Oregon Wetlands Explorer for wetland data. A correct and effective reference to the source of the data should be added. Likely source is "Oregon Natural Heritage Information Center & The Wetlands Conservancy. 2009. Oregon Wetland Cover, Dated 20091030. ESRI file geodatabase. Oregon Natural Heritage Information Center, Oregon State University." If the two wetland data sets (Oregon Wetland Cover and NWI) were used in the analysis, and if they both mapped a wetland at a particular location where construction or operations footprints are co- located with the wetlands, is the wetland impact counted twice –once for the OBIC data and once for the NWI data?	The Oregon Wetland Cover includes National Wetland Inventory data. There is no repetition of data regarding these two data sets. A visual review of the wetland geospatial data was conducted to determine areas of potential conflict and inconsistency. Mapped wetlands that have been developed (as indicated on most recent NAIP aerial imagery) have been deleted from the compiled dataset. Some boundaries of wetland data that are grossly mismatched with features evident on aerial mapping (road edges, buildings, and lake and pond shorelines) have been revised to exclude areas clearly not wetland or open water. These revisions have been made to remove the possibility of repeated counting of similar wetland polygons.
3.2.2.4 Water Resources/Methodology	p. 3-68	32-34	However, construction engineers are unlikely to impact the entire extent of this circular buffer when wetlands or riparian areas are present, but would, instead reshape 33 the construction area around the tower pad to exclude wetland areas.	This statement seems to equate riparian areas with wetlands, which is inaccurate. The relevant discussion applies to wetlands and not riparian areas. The reference to "riparian" should be deleted: "However, construction engineers are unlikely to impact the entire extent of this circular buffer when wetlands ~~or riparian~~ areas are present, but would,	Revised

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				instead reshape 33 the construction area around the tower pad to exclude wetland areas."	
3.2.2.5 Water Resources/Affected Environment 3.3.4.2 Cumulative Effects/Water Resources 3.3.4.2 Cumulative Effects/Water Resources	p. 3-69 p. 3-69 p. 3-1025 p. 3-1026	16-22, 30-32 27-28 25	Subbasins and watersheds are assigned hydrologic unit codes (HUCs); Table 3-19 presents the miles of streams, miles of 303(d) listed streams, number of surface water diversions, acres of medium to high flood risk, and acres of surface water drinking sources by county The geographic area of influence for the analysis of cumulative impacts to water resources is defined as the watersheds (4th level HUCs) of waterbodies crossed by the Proposed Action and alternatives. SEGMENT 1 – MORROW-UMATILLA	Data are organized and reported in inconsistent groupings in different sections of the DEIS. Consider using a consistent analysis group structure or explain the decision to use the different groupings. • Section 3.1.1.2 Overview (p. 3-2) describes 6 Project segments to "describe the affected environment and environmental consequences in the context of the geography, land uses, and resources…" • Section 3.2.2.5 p. 69 lines 16-22 describes HUCs, but they aren't used to organize or report analysis data; • Section 3.2.2.5 p. 69 line 31 – Data in table 3-19 are described as being organized by county; • Cumulative Effects Section 3.3.4.2 Water Resources identifies 4th level HUCs as the area of influence for analysis; • Section 3.3.4.2 p. 3-1026 line 25, the cumulative effects are reported by the 6 Segments originally described in 3.1.1.2.	Revised
3.2.2.5 Water Resources/Affected Environment	p. 3-69	16-22	These rivers and streams drain to several major watersheds that ultimately drain to the Columbia River, as shown in Figure 3-5. From northwest to southeast, the affected watersheds are the Middle Columbia and Lower Snake sub-basins in Oregon and the Middle Snake sub-basin in Oregon and Idaho. Subbasins and watersheds are assigned hydrologic unit codes (HUCs); sub-basins are identified by a four-digit HUC, while watersheds are identified by an eight-digit HUC (that is, the basin HUC plus a four-digit identifier). The Middle Snake Basin is assigned HUC 1705; the Lower Snake Basin, HUC 1706; and the Middle Columbia Basin, HUC 1707.	This explanation of HUCs is either unnecessary or misplaced. Results of analysis in 3.2.2 are reported by county, not by HUC, with the exception of Table 3-21, which uses 8-digit HUCs that are not included in this explanation. It also uses sub-basin names that are not included here. This narrative appears to use "major watersheds," "watersheds," and "sub-basins" interchangeably, as synonyms, until line 18, where watershed and sub-basin are differentiated. So the terminology prior to line 18 needs to be corrected. The terms "major watershed," "watershed," and "sub-basin" are not used on Figure 3-5.	Revised; terms changed to sub-basin.
3.2.2.5 Water Resources/Affected Environment	p. 3-70/Figure 3-5		River Basins "Hydrologic Sub-Region – 2nd Order"	These terms are used on Figure 3-5 apparently to identify the drainage basin categories listed in the previous comment.	Figures removed
3.2.2.5 Water Resources/Affected Environment	p. 3-73/Table 3-21			Sub-basin names and 8-digit HUCs used in this table are not explained in text nor identified on maps. Consequently they are not useful.	Comment noted
3.2.2.5 Water Resources/Affected Environment	p. 3-75	3	Throughout the analysis area, depth to groundwater exceeds 30 feet.	This statement is in error. See comment above for page 3-67.	Shallow groundwater section revised to reflect NRCS depth-to-groundwater results, per soil survey area, and to include USGS well-log information in requested locations.
3.2.2.5 Water Resources/Affected Environment	p. 3-78	2-4	Emergent wetlands ("palustrine emergent" in the 1979 Cowardin system) are characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens defined by the lack of significant shrub or tree cover.	This sentence structure muddles the definition of PEM wetlands. The phrase "…excluding…cover" needs to be fixed, as mosses and lichens are not defined by the lack of significant shrub or tree cover, as the sentence now states. It might be rewritten as "…dominated by erect, rooted, herbaceous hydrophytic angiosperms, and having less than 30% cover of trees or shrubs."	Revised
3.2.2.5 Water Resources/Affected Environment	p. 3-78	20	Scrub-shrub wetlands in the analysis area often include red-osier dogwood (*Cornus stolonifera*),	In the wetland context, the convention for botanical nomenclature is to use the names published in the National Wetland Plant List: http://rsgisias.crrel.usace.army.mil/NWPL/. In the list, the binomial for red-osier dogwood is *Cornus alba*. Consider conforming to the list.	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-79/Table 3-25		Row "High" Intensity of Impacts, the Description includes this bullet: • Project activities that result in a long-term loss of wetland function	Both the USACE and ODOE likely will require wetland mitigation to replace wetland functions lost due to the project. Therefore, there likely will not be any long-term loss of wetland function. This criterion is not quantified or specify how "long-term" is defined in this particular context. In section 3.1.2.1, long-term is defined as greater than 3 years. However, Section 404 and Oregon Removal Fill permitting differentiate temporary (short term) impacts as being restored within 24 months; impacts not restored within that time are considered long-term or permanent. Define long-term and short-term	Definitions of long term and short term have been edited.

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				consistently with the regulatory definitions. This request applies to the criteria in the "moderate" and "low" categories, as well. This criterion does not specify how much loss of which functions, would be required. It treats all wetland functions as a single entity, which is a fallacy. Wetlands have many functions that operate in varying degrees of positive and negative relationships through time.	
3.2.2.6 Water Resources/Environmental Consequences	p. 3-79/Table 3-25		Row "High" Intensity of Impacts, the Description includes this bullet: • Project activities that impact springs or wells	This criterion includes all degrees of impact to any aspect of a spring or well. There is no threshold. Removal of a small amount of vegetation at a spring could be ranked the same as permanent fill of the entire area. This seems inappropriate as it does not differentiate minor impacts from substantial impacts.	Comment noted
3.2.2.6 Water Resources/Environmental Consequences	p. 3-79/Table 3-25		Row "High" Intensity of Impacts, the Description includes this bullet: • Placement of tower foundations in areas of shallow groundwater or aquifers	On pages 3-67 and 3-75 the DEIS states that there is no shallow groundwater in the analysis area. Nor are there shallow aquifers. Thus, consider of placement of foundations in areas of shallow groundwater aquifers should be deleted. If shallow groundwater or aquifers were present, installing a tower foundation to a depth that does not impinge on the groundwater or aquifer might be a different intensity of impact than installing a foundation into the groundwater or aquifer. This criterion does not allow for that differentiation.	Comment noted.
3.2.2.6 Water Resources/Environmental Consequences	p. 3-79/Table 3-25		Row "High" Intensity of Impacts, the Description includes this bullet: • Project activities that result in a long-term increase of sedimentation to nearby surface- water resources	Project construction or related permits will almost certainly not provide for long-term increase of sedimentation. Thus, this is likely an invalid measure for assessing impacts. This criterion is not quantified – long-term is not defined, nor is the quantity of sedimentation. The next category of impact in the table, Moderate, includes a similar criterion: "Project activities that result in short-term increases in sedimentation to nearby surface-water resources," as does the third impact category (Low): "Project activities that result in infrequent periodic increases in sedimentation to nearby surface-water resources." It is conceivable that a short-term impact of large amounts of sediment might be a more intense impact than a long-term increase of a very small amount of sediment. Without quantifying the amount of sediment, however, that differentiation cannot be made.	Comment noted
3.2.2.6 Water Resources/Environmental Consequences	p. 3-81	12	Materials that could contaminate the construction area include <u>lead-based paint flakes</u>, . . .	Idaho Power will not use lead-based paint. It is unclear how lead-based paint would contaminate the Project construction area. Unless there is a direct contamination process that can be described, this should be deleted.	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-82	9-14	Long-term loss of vegetation and trees near streams and along the transmission line may cause a slight localized increase in surface water temperature because stream temperature in forested settings can be strongly influenced by the presence or absence of shade. Water temperature impacts would be greatest along small, slow-moving, and shallow waterbodies. Thinning or removal of vegetation within or adjacent to riparian areas could also contribute to long-term local increases in sedimentation.	Provide references to peer-reviewed data to substantiate these statements about shade, temperature and sedimentation.	Revised; references have been provided in the text.
3.2.2.6 Water Resources/Environmental Consequences	p. 3-82	16-17	As stream temperature is constantly striving to gain equilibrium with air temperature, the influence of direct solar radiation can be substantial.	Inappropriate anthropomorphism. Stream temperature does not "strive." Stream temperature is constantly adjusting toward equilibrium with ambient air and soil temperatures. Amend sentence as follows: "As stream temperature is constantly ~~striving to gain~~ <u>adjusting towards</u> equilibrium with air temperature, the influence of direct solar radiation can be substantial."	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-82	9-13, 17-19	Long-term loss of vegetation and trees near streams and along the transmission line may cause a slight localized increase in surface water temperature because stream temperature in forested settings can be strongly influenced by the presence or absence of shade. However, even though gaps in forest canopy cover	These two passages seem to be inconsistent. The first passage juxtaposes "slight localized increase in …temperature" with "…can be strongly influenced," an internal inconsistency. The second passage apparently reverts back to less influence with "…temperatures do not continue to increase…" Clarify what effect vegetation removal would have on water temperature and quality, and provide references to supporting data.	Revised

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			can result in a local increase in water temperature, overall stream temperatures do not continue to increase because the warmed water moves into canopy cover downstream (Danehy et al. 2005).		
3.2.2.6 Water Resources/Environmental Consequences	p. 3-82	20	The majority of stream crossings would occur in shrublands, outside of forested areas.	The analysis in this section does not provide any documentation to support this statement. There is no mention of a landcover analysis that identifies shrubland, and shrubland is not defined. Provide a citation or delete the sentence.	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-82	20-22	Other factors being constant, stream temperatures in shrubland areas can be expected to be generally higher than those of forested areas, due to a lack of canopy cover.	Provide reference to support this statement.	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-83	15-17	The construction of drive-through fords and installation of culverts and bridges would require in-stream 15 work that would cause short-term increases in erosion and sedimentation in the waterbody at the 16 construction site, with sedimentation effects extending downstream.	Bridges are not included in the two stream crossing types considered, in lines 3 – 5 on page 3-83.	Text specific to crossing-structure typeshas been removed.
3.2.2.6 Water Resources/Environmental Consequences	p. 3-83	15-17	The construction of drive-through fords and installation of culverts and bridges would require in-stream work that would cause short-term increases in erosion and sedimentation in the waterbody at the construction site, with sedimentation effects extending downstream.	This statement makes the following incorrect assumptions: (i) All crossing construction could either be conducted when streambeds are dry, or using diversion methods to remove water from the channel. The assumption "would cause" is not correct. Construction could, potentially, cause erosion or sedimentation. (ii) Bridges (see previous comment) can be placed with no work occurring below the ordinary high water line, which presumably would keep all work out of the "waterbody."	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-85	22-23	Project construction also has the potential to adversely impact groundwater quality in shallow groundwater areas. Where shallow groundwater exists, excavations for transmission line structures may contact shallow groundwater.	These statements are inconsistent with previous statements that there is no shallow groundwater in the analysis area. Correct or clarify the discrepancy.	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-89	19-20	An additional long-term wetland is the conversion of forested wetland classes.	Author probably intends that "impact" should be inserted between "wetland" and "is."	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-89	18-19	These impacts would be long-term and would be included in the Section 404 Permit for the B2H Project.	Temporary impacts would also be included in the Section 404 permit.	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-95	7-11	The exposure to areas of medium and high flood risk of the alternatives is comparable to the Proposed Action, except in the Burnt River Mountain and Brogan areas as follows: • Burnt River Mountain: Proposed—90.2 acres; Alternative—40.6 acres • Willow Creek: Proposed—44.7 acres; Alternative—130 acres • Tub Mountain South: Proposed—50.7 acres; Alternative—279.6 acres	The introductory sentence names the Burnt River Mountain and Brogan areas; the bullets include Burnt River Mountain but not Brogan. Clarify this discrepancy.	Revised
3.2.2.6 Water Resources/Environmental Consequences	p. 3-95	24-25	Because these effects would be long-term, theywould constitute a moderate impact to wetlands in the B2H Project area.	According to Table 3-25 on p. 3-79 Moderate Impact to wetlands is "Project activities that result in permanent fill in wetlands." The impact criteria in Table 3-25 and the impact analysis must be consistent.	Comment noted
3.2.2.7 Water Resources/Mitigation	p. 3-98	10-11	The B2H Project does not meet the criteria for anationwide permit and thus an individual permit and associated mitigation are required.	The analysis presented in the DEIS does not support this conclusion. The analysis presents only total wetland impacts. The determination of whether a NWP can be used is based on the size of impact at individual wetland/waterbody crossings. Data for this level of analysis are not included in the DEIS. Moreover, Idaho Power has not submitted a Pre-Construction Notification for the B2H Project to the U.S. Army Corps of Engineers, and therefore, no decision has or could be made regarding whether the B2H Project would comply with Nationwide Permit 12. The sentence in the Draft EIS should be deleted.	Revised
Section 3.2.3 Vegetation					
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Consider being consistent and use the term "analysis area", since it was defined, instead of the various terms used in this section such as project area, Project Area, Project area, B2H Project area, Proposed	Text has been revised to use the term "analysis corridor" to describe the area where vegetation resources were analyzed.

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				Action and all alternatives, analysis areas of the Proposed Action and all alternatives, analysis areas, vicinity of the Proposed Action and alternatives, etc. The use of so many different terms is confusing to the reader and it is unknown if these are the same or not.	
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Be consistent and define terms such as primary vegetation community vs vegetation community vs land cover type vs ecological system vs community subtype, etc. It is confusing since the section jumps around between all of these terms and descriptions.	The vegetation resources section has been revised to clarify the classification of vegetation communities.
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Make sure all citations are included in Chapter 6 – References. Most references were not included so it difficult to determine if they are appropriate.	References throughout the vegetation section have been revised, and Chapter 6 updated accordingly.
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Use common names for plants and include the italicized scientific name in parentheses the first time the common name is used in text. Do not repeat the scientific name more than once. Check this throughout the entire section, as many are repeated multiple times and in some instances scientific names are used instead of common names or scientific names are used with common in parentheses. If the scientific name is called out in a table, it doesn't need to be called out again later in text. Special status plants scientific names were called out in Table 3-36 and do not need to be called out again in the description by segment. Make sure that the subspecies name is not capitalized, as it often is throughout this section, i.e., *Artemisia tridentata* ssp. *Vaseyana.* It would be helpful to cite the nomenclature used in the document, particularly since ODA may have a different common name than USDA Plants database.	The vegetation resources section has been revised.
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Be consistent with reporting numbers and please include a "comma" when reporting numbers >1,000.	Comment noted
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Be consistent in the use of ORNHIC vs ORBIC. The current name is ORBIC, so ORNHIC should not be used to avoid confusion.	Text revised to only use ORBIC.
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Medusahead rye does not need to be capitalized.	Revised
3.2.3 Vegetation Resources, Appendix B.3	Entire Section and Appendix B.3	n/a	n/a	Use the acronym "ROW" for all references to right-of-way within this section. Use of this term should be consistent. In this section there is reference to right-of-way, right of way, and rights-of-way.	Text has been revised to use the term "right-of-way" consistently to avoid excessive use of acronyms.
3.2.3 Vegetation Resources	Entire Section	n/a	n/a	Check the location of tables and figures; they should be placed in the document relatively close to its first reference.	Revised
3.2.3.4 Vegetation Resources/Methodology	p. 3-104	29	state of Oregon endangered, threatened, critical,and vulnerable species	The state of Oregon, through ODA, lists endangered, threatened, and candidate plant species and publishes this list on their website. Define state of Oregon "critical and vulnerable" species or delete the terms "critical and vulnerable."	Text has been revised to discuss only Oregon endangered or threatened species.
3.2.3.4 Vegetation Resources/Methodology	p. 3-104	32-33	species listed as endangered, threatened, and sensitive in Oregon by ODFW	The Oregon Department of Agriculture, and not the Oregon Fish and Wildlife, is responsible for listing protected plant species. *See* ORS § 564.105 ("The Director of Agriculture has the responsibility to protect and conserve the native plants of this state that are threatened species or endangered species."). Additionally, the regulatory terms used in the protection of plant species in Oregon are "endangered" and "threatened." *See id.* "Sensitive" plant species are a regulatory designation of the USFS and BLM, and not Oregon. Revise the Draft EIS statement to read: "species listed as endangered, or threatened, ~~and sensitive~~ in Oregon by ~~ODFW~~the Oregon Department of Agriculture."	Revised
3.2.3.4 Vegetation Resources/Methodology	p. 3-105	1-13	bulleted lists	Add a citation for each dataset and add to the References Section.	In the Final EIS, data used in the analysis are cited on the resource inventory maps in the Map Volume. In addition, all datasets used in the analyses in the Draft EIS and Final EIS are compiled and documented in the Decision File for the B2H Project.
3.2.3.4 Vegetation Resources/Methodology	p. 3-105	7	Geographic Biotics Observation System (GeoBOB; BLM)	Define GeoBob. Clarify if it an internal BLM source.	The text has been revised to mention GeoBOB as an agency internal source.
3.2.3.4 Vegetation Resources/Methodology	p. 3-105	26-29	Before any right-of-way is granted, detailed ground surveys and wetland delineations will be completed within the B2H Project's site boundary (i.e., 500 feet on either side of the centerline of the selected route) and impacts to wetlands and surface waters are	The expected impacts to wetlands and surface waters should be called out in the Environmental Consequences section (3.2.3.6), not the Methodology section since there isn't any context for the number of overall acres impact in this section.	The portion referenced in the comment has been revised to describe the Riparian Conservation Area methodology. Effects on these resources are described in the Environmental Consequences section (Section 3.2.3.6).

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			expected to be less than 3 acres overall.		
3.2.3.4 Vegetation Resources/Methodology	p. 3-105 and 3-106	35 and 1-2	The one mile analysis area was also used for the analysis of first foods because these resources were analyzed within the context of the vegetation communities.	This is the first use of "first foods." Include it in the Introduction and define the term. Otherwise, it is unclear what is meant by this sentence in this context.	Revised
3.2.3.4 Vegetation Resources/Methodology	p. 3-106	4	used for identification of special status plant species that could potentially be impacted by the B2H	Consider defining "special status plant species" the first time it is used, possibly in the Introduction (Section 3.2.3.1) since it appears like it includes many different species, including USFWS, ODA, BLM, and USFS listed species. Consider using the acronym SSP and update the entire section to reflect any updates. Be consistent throughout the document when using terms for special status plant species. Some places in the document, "sensitive plant species" is used instead. Another place "non-listed plant" was used. Be consistent with the use of terms.	Text has been revised to use and clarify the use of the terms special status plant, federally listed or candidate, and sensitive plant consistently.
3.2.3.4 Vegetation Resources/Methodology	p. 3-106	12	Proposed Acton and alternatives	"Action" is spelled incorrectly. Update from "Acton" to "Action."	The portion referenced in the comment has been revised to describe the noxious weed analysis in the context of vegetation communities.
3.2.3.4 Vegetation Resources/Methodology	p. 3-106	11-12	The analysis area for noxious weeds was defined as the counties within Oregon and Idaho that could potentially be affected by the Proposed Acton and alternatives.	List which counties are included in the analysis area.	The portion referenced in the comment has been revised to describe the noxious weed analysis in the context of vegetation communities.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-106	14-15	This section describes the existing condition of the vegetation resources that could be affected by implementing the Proposed Action or any of the alternatives.	Consider adding a sentence that mentions what types of vegetation resources are included in this section, i.e. Vegetation Communities, Special Status Plant Species, Noxious Weeds, First Foods/Ethnobotanical Resources.	The Affected Environment section has been expanded to discuss in more detail vegetation communities, federally listed and candidate plant species, sensitive plant species, noxious weeds, and traditional foods and ethnobotanical resources.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-106	30	ecoregions	Change "ecoregions" to "ecoregion."	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-106	34	bluebunch grassland	The accepted common name is bluebunch wheatgrass, according to NRCS Plants database. The scientific name should be in parentheses if this is the first time it is used.	The text revised to read "bunchgrass dominated grasslands"
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-106	35	ponderosa pine woodlands	The scientific name should be in parentheses if this is the first time it is used.	The text revised to read "conifer dominated woodlands"
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-106	35	The area crossed by the B2H Project is	Suggest replacing "B2H Project" with "analysis area."	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-107 and 3-109	10-25 and 3-11	For the purposes of this analysis, a variety of ecological systems and vegetation community subtypes....	Define ecological systems, vegetation community subtypes, land cover types, and primary vegetation communities, and NVCS macrogroups and clarify how they were all utilized and relate to the analysis area.	Text has been revised to clarify how ecological systems identified from the NWGAP dataset were used to classify vegetation communities. A table summarizing the classification of vegetation communities is presented in Appendix B.3.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-107	12-13	B2H Project area	Suggest replacing "B2H Project" with "analysis area."	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-107	12-20		The primary vegetation communities called out in text should match those on Figure 3-7. Place Figure 3-7 on page 3-109 (or at least closer to its first reference than page 3-113).	Figure 3-7 was not carried forward into the Final EIS, and the distribution of vegetation communities in the B2H Project area is displayed by vegetation community subtype in the Map Volume.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-107	12-20	• The primary vegetation communities and land cover types within the B2H 12 Project area include: 13 Grasslands 14 Shrublands 15 Forest/Woodlands 16 Wetlands, Riparian, Surface Water 17 Bare Ground, Cliffs, Talus 18 Agricultural Lands 19 Developed/Disturbed Land	The vegetation communities and land cover types in the Draft EIS appear to be different than those set forth in the Resource Report. Explain the decision to use these types and not the ones in the Resource Report.	The vegetation community classification has been revised for the Final EIS based on direction from the BLM. A crosswalk table providing greater detail is included in Appendix D – Vegetation Supporting Data.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-107	12-20	(4) Wetlands, riparian, surface water	Include the crosswalk for wetlands, riparian, and surface water primary vegetation communities; they are missing from the current crosswalk table in Appendix B.3-2. Provide these to better enable a crosswalk with the "general vegetation communities/habitat types" in the resource report.	The identification of wetland, riparian, and surface-water vegetation communities has been revised in the Final EIS to use the RCA methodology described in Section 3.2.3.4. The RCA methodology differs from classification of other vegetation communities by not relying on reclassified GAP data to identify community extents. Because of this difference, RCA vegetation communities are not included in the Appendix D – Vegetation Supporting Data table cross walking vegetation communities to their source ecological systems.
3.2.3.5 Vegetation Resources/Affected	p. 3-109	9-11	A crosswalk between the vegetation community subtypes, ecological systems, and NVCS	This table was reviewed and comments are provided at the end of the comments referencing the Appendix.	Comment noted

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Environment			macrogroups is presented in Table B.3-2 in Appendix B.3.		
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-109	23-24	bluebunch wheatgrass (Pseudoroegneria spicata.)	This species was mentioned earlier (p.3-106). Include scientific name the first time it is mentioned on page 3-106.	The text has been revised to provide the scientific name with the first mention of a species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-109	25-26	making this a difficult community to photo interpret, classify, and map.	Suggest changing to "difficult community subtype" since this is a subtype not a primary community.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-110	34	(Tetra Tech 2011)	Include this reference in Chapter 6.	The classification of vegetation communities has been revised and no longer reflects the classification prepared by TetraTech.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-111	3	subtypes	Suggest changing to "subtype."	Comment noted. The mountain shrub vegetation community subtype differs from both the dwarf sagebrush steppe and tall sagebrush steppe subtypes.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-111	5	(Symphoricarpus spp.)	Correct the spelling: *Symphoricarpos*.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-111	29-30	USFS 2011b	Include this reference in Chapter 6.	The description of the mixed conifer vegetation community has been revised and no longer references this document.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-111 and 3-112	14-38 and 1-10	Mixed Conifer Forest	Revise the description of the mixed conifer subtype for clarity.	The description of the mixed conifer forest subtype has been revised to more clearly discuss site-specific species dominance and composition, as well as the ecological systems used to define the mixed conifer forest subtype.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-112	11-15	Rocky Mountain Aspen	This is a confusing title since the accepted common name is quaking aspen, which is referenced above on line 4. Consider re-naming this to Quaking Aspen Woodland and Forest.	The Rocky Mountain aspen subtype described in the Draft EIS has been renamed as the "Aspen" subtype to match vernacular descriptions of this community subtype better.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-112	13	dominated by aspen	The accepted common name is quaking aspen, which is referenced correctly above on line 4 on the same page. Consider re-naming this to quaking aspen.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-114	8-9	Therefore, any wetlands disturbed by the B2H Project would be reconstructed, rehabilitated, and/or otherwise recovered.	Consider adding that both the USACE and ODOE likely will require wetland mitigation to replace wetland functions lost due to the project. Therefore, there likely will not be any long-term loss of wetland function.	The text has been revised to describe RCA vegetation communities, clarify that these communities do not represent jurisdictional wetlands, and refer the reader to the Water Resources section, Section 3.2.2, for any discussion of impacts on wetland resources.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-114	13-14	which may or may occur along the margins	The word "not" appears to be missing from this sentence after the "or may."	The portion of the text referenced in the comment has been revised to discuss RCA vegetation communities.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-114	14-15	Surface waters in the project area include ponds, lakes, and in some cases, rivers.	This sentence seems misplaced and should probably be included below where surface waters are discussed.	The portion of the text referenced in the comment has been revised to discuss RCA vegetation communities.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-114	35-38	Although riparian habitats are often combined with wetlands (as a result of their intimate relationship to the hydrological regime), riparian areas differ from wetlands in that they are generally linear, more terrestrial (less hydric), and are often dependent on a natural disturbance regime relating to flooding and stream dynamics (Naiman et al. 2005).	Include the crosswalk for wetlands, riparian, and surface water primary vegetation communities. These communities are missing from the current crosswalk table in Appendix B.3-2. Comments cannot be provided with the crosswalk missing.	The identification of wetland, riparian, and surface-water vegetation communities has been revised in the Final EIS to use the RCA methodology described in Section 3.2.3.4. The RCA methodology differs from classification of other vegetation communities by not relying on reclassified GAP data to identify community extents. Because of this difference, RCA vegetation communities are not included in Appendix D – Vegetation Supporting Data table cross walking vegetation communities to their source ecological systems.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-115	5-7	In addition, this land cover type might include two anthropomorphic wetland types; Introduced Riparian Vegetation and Ruderal Wetland.	This sentence seems misplaced or this paragraph should be better organized since it discusses surface water and then the other 2 wetland types. Wetland types were discussed in the paragraphs above. Rewrite this section for Wetlands, Riparian, and Surface Water for clarity.	The portion of the text referenced in the comment has been revised to discuss RCA vegetation communities.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-115	10-14	Watercourses that are crossed by the Proposed Action and alternatives include tributaries to the Umatilla River (Bird Creek and Butter Creek), tributaries to the Snake River (Burnt River, Grande Ronde River, Owyhee River, Powder River, and Succor Creek), and a tributary to the Columbia River (Willow Creek).	These water sources are mentioned with the vegetation and hardly mentioned after (within the vegetation section). These waterbodies are important for other resources; however, they also influence the vegetation present in the analysis area. Include their presence/location in each segment, as appropriate.	The portion of the text referenced in the comment has been revised to discuss RCA vegetation communities, which are identified from several features including the water sources discussed in the Draft EIS. The presence of and potential effects on these resources are discussed in greater detail in the Water Resources section, Section 3.2.2.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-115	16	Bare ground, cliffs, and talus land covers are areas with sparsely vegetated plant communities, where	The term "land covers" here doesn't seem appropriate. Isn't Bare Ground, Cliffs, and Talus considered a primary vegetation community?	Revised
3.2.3.5 Vegetation	p. 3-115	23	vegetated ecological systems	Suggest changing "ecological systems" to "areas" or "communities"	Revised

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Resources/Affected Environment				since this subsection is a description of a primary vegetation community, not an ecological system.	
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-116	1-29	Federally Listed Species and Special Status Species	Consider including federally listed species under the heading of Special Status Plant Species, as commented earlier.	The text has been revised to discuss federally listed or candidate plant species separate from sensitive plant species in the Affected Environment and Environmental Consequences sections.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-116, Table 3-35	8	Primary vegetation community = Grassland	Habitat for Howell's spectacular thelypody is documented as seasonally wet alkali meadows (RR4 and Appendix B.3). The DEIS Table 3-35 lists the primary vegetation community as "grassland." Consider updating this to "Wetlands, Riparian, and Surface Water primary vegetation community, as it seems to be more applicable. One potential issue with assigning the special status plants to one of the broad primary vegetation communities is that most special status plants have a very specialized habitat that do not fit easily into one of the broad primary vegetation communities. Consider calling out the specific habitat, as was done in the RR4 report.	The table referenced by the comment has been revised to no longer identify the vegetation community where Howell's spectacular thelypody, or any other special status plant, is likely to occur.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-116	17	state endangered and threatened species in Oregon (ODWR 2008)	Include the reference for ODWR 2008 in Chapter 6. It is unclear why ODWR would have county level lists of state endangered and threatened species. ODA is responsible for the list of endangered and threatened plant species in Oregon. Use the current list (not one from 2008).	Sensitive plant species considered threatened or endangered by the State of Oregon were identified from lists created and maintained by the ODA in 2014. The text has been revised accordingly.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-116	18	Idaho BLM 2010	Idaho BLM special status plant list has been updated several times since 2010; please use the most recent data.	Idaho BLM sensitive plant species were identified using the most recent lists created in 2014.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-116	20-212	Some of these species are assigned a status by multiple agencies. In addition to special status species, a list of management indicator species was obtained from the Wallowa-Whitman National Forest LRMP, as amended (USFS 1990).	This is the only mention of management indicator species in the vegetation section. Are plant species included on this list? If so, please define and make sure it is included as a status in table 3-36 and consistently applied throughout the section.	Text describing the identification of sensitive plant species has been revised. Management indicator species lists were not used to identify sensitive plant species for the Final EIS as none of the management indicator species are plant species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-116	27-29	Of these 56 species, 18 were identified by BLM staff as high priority species to be carried forward for detailed analysis (Fritts 2014). These species are indicated in the table below and will be analyzed within their segments of known occurrence.	Clarify how and why these 18 species were identified to be carried forward as "high priority" and why others were not. Indicate which species are "high priority" in Table 3-36.	The methods used to identify sensitive plant species for greater discussion in the Final EIS were revised to identify species with known occurrences in the 1-mile analysis corridor.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		General comment for the table	Order the species found in this table; it is not easy to find a particular species since it is not in alphabetical order by common name, scientific name, or listed by status or community.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36	Whole Table and DEIS	Species	Ensure that the species names are consistently used throughout the document.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36	Whole Table	Status	Review the table to ensure that the status for each species is correct and up to date. Cronquist's stickseed is also an ID BLM special status plant, as are several others including Snake River Goldenweed. Ensure the current status is also updated in Appendix B.3.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36	Whole Table	Primary Vegetation Community	Describe how the primary vegetation community was decided. Provide references for this since many of the communities identified in the table do not appear to match with published habitat information, such as Douglas' clover which is found in Grasslands and Wetlands, Riparian, and Surface Water primary vegetation communities. Consider populating this column with the published habitat information instead of trying to put the unique habitat that many of these special status plants have into one of these very broad categories. The latter is incorrect.	The table referenced in the comment has been revised to no longer identify the vegetation community where Douglas' clover, or any other special status plant, is likely to occur.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117 to 3-120; Table 3-36		General Comment Many occurrences within the ODA, BLM, USFS, Habitat Descriptions, Potential Habitat, and Known Occurrence columns.	In many instances the data in Table 3-36 differs from data provided in RR4. Clarify and document methodology and references used for populating Table 3-36.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor.
3.2.3.5 Vegetation Resources/Affected Environment	p. 117-120; Table 3-36		General Comment Potential list of SSPs within the Analysis Area	There are an additional 21 vascular/non vascular plants in table 3-36 that were not identified in the RR4. Clarify why.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Laurent's milkvetch (*Astragalus collunus* var. *laurentii*)	The common name for this species according to ODA is Lawrence's milkvetch (not Laurent's milkvetch). It is typically found in grasslands, not bare ground. This species is also an OR BLM sensitive species.	The table referenced by the comment has been revised to no longer identify the vegetation community where Laurent's milkvetch, or any other special status plant, is likely to occur and include accurate status information. The common name, Laurent's milkvetch, was used to be consistent with nomenclature in USDA PLANTS and ITIS.

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3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Mingan moonwort (*Botrychium minganense*)	The status should be just "USFS," not "USFS Threatened."	The table referenced by the comment has been revised to include accurate status information for each sensitive plant species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Salt heliotrope (Heliotropium curassavicum var. obovatum)	The status should be just "USFS", not "USFS Sensitive." Clarify why the species primary vegetation community for this species is "disturbed." It is typically found in saline places in valleys and lowlands, often in beds of dried ponds. Maybe it would better fit into the Wetlands, Riparian, and Surface Water and shrublands (Desert Shrub) communities?	The table referenced in the comment has been revised to no longer identify the vegetation community where seaside heliotrope, or any other special status plant, is likely to occur and include accurate status information.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Douglas' clover (Trifolium douglsii)	The status should be just "USFS", not "USFS Sensitive." This species is typically found in Grassland and Wetlands, Riparian, and Surface Water communities. Appendix B.3 indicates it is found in "wet meadows, often along creeks, riparian meadows, and moist areas." Suggest updating the primary vegetation community.	The table referenced in the comment has been revised to no longer identify the vegetation community where Douglas' clover, or any other special status plant, is likely to occur and include accurate status information.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Many-flowered phlox (Phlox multiflora)	The status should be just "USFS", not "USFS Sensitive."	The table referenced by the comment has been revised to include accurate status information for each sensitive plant species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Oregon semaphore grass (Pleuropogon oreganus)	The status should be just "USFS", not "USFS Sensitive."	The table referenced by the comment has been revised to include accurate status information for each sensitive plant species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Crenulate moonwort (Botrychium crenulatum)	This species is typically found in saturated soils, probably best fits the Wetlands, Riparian, and Surface Water. Suggest updating the primary vegetation community.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor. No known occurrences of crenulate moonwort were identified in the 10-mile analysis corridor, and as such the species not included in the Final EIS.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Douglas' clover	According to the description on page 3-141 lines 28-34, this species is from wet meadows, riparian meadows, open grasslands and shrublands, but in this table the primary communities are Forest/Woodlands and Shrublands. Make this consistent. Check all primary vegetation community designations in this table for consistency with published habitat descriptions and designation of the primary vegetation community and be consistent throughout the section, including the descriptions in Appendix B.	The table referenced by the comment has been revised to no longer identify the vegetation community where Douglas' clover, or any other special status plant, is likely to occur and include accurate status information.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36	Table Footer	Idaho BLM Sensitive	Idaho BLM refers to sensitive plants as "special status plants", as indicated in their most current list, dated December 19, 2014.	Comment noted. The table referenced in the comment has been revised and no longer contains the footnote referring to Idaho BLM sensitive plant species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-117/Table 3-36		Primary Vegetation Community	Clarify "unclassified", which is the primary vegetation community for several species including earth lichen, Twin-spiked moonwort, and least snapdragon.	The table referenced by the comment has been revised to no longer identify the vegetation community where any special status plant is likely to occur.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-119/Table 3-36		Slickspot peppergrass	This species is a candidate species under the Endangered Species Act. The BLM in Idaho consults on this species with USFWS, despite it not being currently listed. The table indicates that it isn't known to occur within the analysis area. There is no mention of this species elsewhere in this section. If there isn't any potential habitat, habitat, occupied habitat or USFWS critical habitat or known occurrences, please indicate that it wasn't considered further in the analysis so there isn't confusion over this species and potential impacts from the Project. If there are any of these habitat categories that overlap the analysis area, please add a brief description about this species and clarify what habitat type overlaps the analysis area and include a discussion in the Environmental Consequences section. This species is listed in Appendix B.3 on page B.3-29 as a USFWS threatened species and its name is "Idaho pepperweed." Be consistent with names in the document. This species is not currently listed as threatened so this should be updated. If habitat doesn't overlap the analysis area, clarify in Appendix B.3 as well.	The identification of federally listed or candidate species has been revised in the Final EIS to discuss slickspot peppergrass and other species not carried forward for analysis as well as provide the rationale.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-121	2-4	Table B.3-1 in Appendix B.3 includes the noxious weeds occurring within the counties that would be crossed by the Proposed Action and the alternatives.	Since this is the analysis area, and it was defined earlier, it would be helpful to refer to it as the analysis area in this sentence and refer to it as analysis area throughout rest of document.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-121	6-10	Factors that affect the ability of some noxious weed species to spread or be controlled within the B2H Project area include particularly dense abundance in	This sentence has a lot of information. Clarify by breaking up into separate sentences and explain why each factor affects the ability of some noxious weeds to either spread or be controlled.	Revised

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			one or more counties, compounds poisonous to livestock, detrimental effects to the biodiversity of natural communities, production of fuel loads for wildfires, and statutes dictating mandatory controls or limits on methods of control (especially herbicides).		
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-121	16-18	A sample of plant species that may have cultural value to tribes and their associated primary vegetation habitats and sites in which they commonly occur is presented in Table 3-37.	Clarify if there is a complete table of species and their respective values elsewhere. Clarify how the presence or absence of these species impacts the Project? Clarify if there are larger implications if negative impacts are experienced?	The analysis of traditional foods and ethnobotanical foods in the Final EIS has been revised to clarify that discussion of these resources occurs in the context of native vegetation communities given the variety, broad distribution, and sensitive nature of the knowledge regarding the use, value, and location of these resources. The cultural value and potential cultural effects for select resources is described in the Cultural Resources section.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-121/Table 3-37	Whole Table	Associated Plants of Cultural Value	Add the scientific name to those that this is their first mention in text.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-122	4-6	The affected environment of first foods and ethnobotanical resources are discussed in the context of their source vegetation communities and will not be discussed specifically in the segment analyses.	Clarify the methodology for obtaining a list of important species and the complete table instead of only a sample.	The plants mentioned in the Potential Ethnobotanical Resources table were determined from prior ethnographic studies and the information that the tribes were willing to share.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-122	10-12	Segment 1 occurs in the Columbia Plateau ecoregion (Table 3-34; Figure 3-6). Agriculture is the principal land cover within the Segment 1 analysis areas, while shrublands and grasslands are the dominant vegetation community types (Table 3- 38; Figure 3-8).	Consider refining the "analysis area" for the proposed action and preferred alternative to only include the ROW. A half mile buffer on each side of the line may provide misleading acreages for community types (i.e. forest).	The description and analysis of vegetation communities in the Affected Environment section has been revised in the Final EIS. The methods used to analyze extent of vegetation communities in the B2H Project area are described in greater detail in the methods section, Section 3.2.3.4.
3.2.3.5 Vegetation Resources/Affected Environment	Starting on p. 3-122		General comment for the Affected Environment By Project Segment section	Consider inclusion of all descriptions, including the ecological system definitions, in the earlier discussion of these primary vegetation communities and subtypes instead of describing by segment and duplicating efforts and information.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	General Comment starting on p. p.3-122		Vegetation Communities	Review and edit the Vegetation Communities Section of each segment and verify each is appropriate for the particular segment discussed. Several references were observed to the wrong segment. Consider summarizing the descriptions. The current descriptions are long and provide so much information that it is challenging to follow, particularly where there are references to vegetation communities, land cover types, ecological systems, subtypes, etc. and a crosswalk is unclear.	The description and analysis of vegetation communities in the Affected Environment section has been revised in the Final EIS to more clearly describe the distribution of vegetation community subtype by alternative route. Text describing vegetation community subtypes has been removed from the discussion by segment to aid in document readability.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-122-123/ Table 3-38	10-14 and Table	Vegetation Community/Land Cover	Be consistent with terms throughout this section, i.e. use of primary vegetation community vs vegetation community vs land cover type vs ecological system vs community subtype, etc.	The description and analysis of vegetation communities in the Affected Environment section has been revised in the Final EIS to more clearly describe the distribution of vegetation community subtype by alternative route.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-123/Table 3-38 p. 3-126/Table 3-39 p. 3-128/Table 3-40	Table Footers	[2] Analysis area is defined as a 1-mile corridor; 0.5 mile from either side of the route centerline.	The analysis area is defined in Section 3.2.3.4 and should be the term used throughout the document. It doesn't need to be defined again in the tables.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-127	4-5	It is characterized by rolling topography composed of loess hills and plains over basalt plains.	Consider a more specific account of topography/land features for each segment. This could be done as desktop review of the area. Consider including minimum-maximum elevation for each segment and descriptions of topography such as, butte, bluff, canyon, etc.	Text describing vegetation community subtypes has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The analysis of vegetation communities in the Affected Environment section has been revised to describe vegetation communities relative to prominent features and landmarks in each segment.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-127	5	The soils are typically deep, well-developed, and old.	Clarify so the soils information presented in this paragraph are not contradictory.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-127	6-9	Excessive grazing, past land use and invasion by introduced annual species have resulted in a massive conversion to agriculture or shrub-steppe and annual grasslands dominated by *Artemisia* spp. and cheatgrass or Kentucky bluegrass (*Poa pratensis*)	Conversion to different communities (agriculture, shrub-steppe, and annual grassland) is stated to occur within the ecosystem type. These conversions would change the Columbia Basin Palouse Prairie from a grassland Primary Vegetation Type to something else, i.e. agriculture, developed, or shrubland. Clarify if this change in primary vegetation has been evaluated and is representative of the current conditions in tables, text, and figures.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The description of the Columbia Basin Palouse Prairie ecological system has been revised to clarify the current distribution.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-127	8	*Artemisia* spp.	Change to sagebrush or big sagebrush, the common name, since *Artemisia* is already used earlier in the text. This will also clarify what is meant since the genus *Artemisia* contains forbs and sub-shrubs including sagewort and wormwood.	The description of the Columbia Basin Palouse Prairie ecological system has been revised and no longer discusses the shrub species that increase as a result of excessive grazing.

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3.2.3.5 Vegetation Resources/Affected Environment	p. 3-127	14-16	Agricultural conversion and composition changes following livestock grazing have apparently retrogressed most of the remaining sites to new exotic-dominated community types. Sandy to gravelly soils or certain low fertility soils (old weathered volcanic ash) are associated with this type (NatureServe 2012).	Clarify how these conversions relate to the Primary Vegetation Community type. Would they still be classified as native grassland, as the Columbia Basin Palouse Prairie ecological system describes? Clarify which of the systems and descriptions most closely relates to the actual vegetation community that currently exists since these definitions do not adequately describe existing conditions. Clarify and explain how this ecosystem type used to be bigger and was converted to Clarify if this conversion is reflected in figures and tables and is considered part of the Primary vegetation community. The soils presented in this paragraph contradict each other. Line 5-"The soils are typically deep, well- developed, and old." Clarify.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The description of the Columbia Basin Palouse Prairie ecological system has been revised to clarify the current distribution and description of past distribution for context. The description of typical soils has been revised to be consistent.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-127	31-32	Typical graminoid weeds include various bromes (Bromus japonicus, B. rigidus, B. rubens) and 31 Medusahead rye (Taeniatherum caput-medusae);	Italicize scientific names.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-128 Table 3-40	Table 3-40	Table of Shrubland subtype acres	This table does not include alkali/xeric species (e.g. greasewood communities). Clarify which subtype greasewood communities are included in. Greasewood/basin wildrye-alkali saltgrass communities are preferred habitat for Federally listed Howell's Spectacular thelypody; this would be pertinent information to include in the table.	The classification of vegetation communities has been revised for the Final EIS, and a table crosswalking the reclassified vegetation communities to their source ecological systems is provided in Appendix D – Vegetation Supporting Data. The analysis of impacts on Howell's spectacular thelypody has been revised to be based on known occurrences and does not discuss potential habitat as identified by vegetation community.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-128	13	in more appropriate	Update "in" to "is."	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-129	7-8	"…in the Great Basin, greasewood is generally absent but, if present, does not co-dominate."	This statement is false. Greasewood is the dominate or sub-dominate species in several areas in southern Idaho. Clarify.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-129	23	(Artemisia tridentata ssp. Wyomingensis), silver sagebrush (Artemisia cana ssp. Cana),	"W" and "C" should not be capitalized.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-129	25-26	Cheatgrass is an indicator of disturbance, and is typically not as abundant as in the Intermountain West, possibly due to a colder climate.	This statement directly contradicts statements made in the "Grasslands" section for Segment 1. For example, Table 3-39 indicates there is 12,773 acres of non-native grasslands in Segment 1. The "Grassland" description on page 3-127 for Segment 1 includes the statement "Cheatgrass typically dominates the community with over 80-90 percent of the total vegetation cover, making it difficult to determine what natural community was formerly present. Non-native grasslands are widespread in Segment 1 and occur in the analysis areas of the Proposed 36 Action and all the alternatives." Clarify.	The description of the Inter-mountain Basins Big Sagebrush Steppe ecological system has been revised to clarify the abundance of cheatgrass.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-129	38	Basin big sagebrush	"B" in Basin should not be capitalized.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-131	4-7	These areas used for the production of crops, such as corn, soybeans, small grains, sunflowers, vegetables, and cotton, typically on an annual cycle. Agricultural plant cover is variable depending on season and type of farming. Other areas include more stable land cover of orchards and vineyards (NatureServe 2012).	Since orchards and vineyards are differentiated from other crops via land cover stability, mentioning if either of these two types are present within this segment would be of interest to the reader.	The "agriculture" vegetation community subtype description has been revised and the description no longer includes orchards or vineyards.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-131	9-10	Developed areas in Segment 1 are primarily composed of rural areas that have been modified at low to medium levels which primarily include areas. These areas are primarily associated with rural residences and agricultural operations and are relatively limited within Segment 1 (Table 3-38).	Clarify/specify which "areas" are being addressed, particularly "primarily include (rural?) areas?"	The description of the developed/disturbed vegetation community subtype has been revised to clarify their relation to rural residences and agricultural operations.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-131	15-16	Although three special status species are known to occur in Segment 1 (Table 3-36), only one species, Laurent's milk-vetch, has been identified by the BLM as a high priority species for detailed discussion.	Why did the BLM indicate Laurent's milkvetch is high priority? Why were the other two plants not chosen as high priority? There is no description indicating why certain SSPs were chosen as high priority and others were not. Document and provide references why some are high priority and some are not.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor.
3.2.3.5 Vegetation Resources/Affected	p. 3-131	17	milk-vetch	Be consistent with names throughout the entire document. Earlier, in table 3-36 it was called "milkvetch" and here it is called "milk-vetch."	Revised

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Environment					
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-131	17-34	General description of Laurent's milk-vetch	There is no discussion regarding types of impacts the Project will have on Laurent's milkvetch, if any. The occurrences were described as being surveyed in 1983. These occurrences may no longer exist in the analysis area. Provide a more detailed discussion and use more updated information, if available. If not available, please clarify that it is unknown what the current status of these occurrences are since the information is from 1983.	The analysis of B2H Project effect on Laurent's milkvetch and other sensitive plant species has been revised in the Final EIS to use the most current data available, as well as more clearly describe types of potential effects and the effectiveness of mitigation.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-131	19	Oregon endemic found in 14 counties in Oregon	According to the ODA website, http://www.oregon.gov/oda/shared/Documents/Publications/PlantConservation/AstragalusCollinusLaur entiiProfile.pdf, this species is only known from 4 counties, not 14 counties. Provide a citation for the number of counties.	Text describing the life history of special status plant species has been moved to the Vegetation Resources appendix. The typo has been corrected.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-131	33-34	Laurent's milk-vetch is presently documented from seven occurrences within the analysis area, near the upper Alkali Canyon watershed of western Umatilla County.	Consider a general description of Alkalli Canyon or other significant topographical, geologic (soils), or vegetative areas in the general description of vegetation. Consider adding Alkali Canyon and possibly other items to a map and referencing it in the text. Consider including the distance to proposed or alternative segments within the text.	Text describing the life history of special status plant species has been moved to Appendix D – Vegetation Supporting Data. Due to the threats posed by disturbance and collection, as well as the uncertain location information for several occurrences, location specific information for special status plants is not included in the Final EIS.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-132	2-5	Sixty-one noxious or invasive weeds are documented as occurring within Segment 1. These plants include all those listed on federal, state and county noxious weed lists, although it is not a comprehensive list of every invasive plant species or noxious weed that could potentially occur within Segment 1.	Clarify if these are actual occurrences within the half-mile analysis area of Segment 1 or is this just the number of species that occur on federal, state, county weed lists for the state/county? Provide a reference. Define occurring/occurrences/populations and their use within the document.	The analysis of noxious weeds has been revised in the Final EIS to clarify the number of weed species present in the vegetation resources analysis area reflects the number of weed species with mapped occurrences, not the number of weed species listed by federal, state, or county agencies. The terms "occurrence" and "population" have been defined and included in the Glossary, Chapter 5.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-132	6-17	Entire paragraph about yellow starthistle	Why is this account included and not others? What is the significance of this species account in relation to the current conditions? Clarify why only one out of 61 noxious weeds identified for this segment (see previous comment), has a descriptive account. Consider removing the yellow starthistle account entirely.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-132	12-13	"It creates a more uniform density in grassland layer"	Clarify what this statement means.	The analysis of noxious weeds has been revised in the Final EIS and no longer contains the text to which the comment is referring.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-132	33-36	The predominant native grasslands in Segment 2 are adapted to higher elevation and precipitation and are described below. The native grasslands of the Northern Rocky Mountain Lower Montane, Foothill and Valley Grassland are found at lower montane to foothill elevations	Clarify "higher elevation and precipitation"; higher than what? Without clarification this claim contradicts the account of the first native grassland. Providing abundance of ecological systems may alleviate some confusion, as would providing elevations.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to an earlier portion of the Affected Environment section to emphasize the broad nature of the descriptions.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-133	26-27	Sites are not as wet as those found in Rocky Mountain Alpine-Montane [Wet Meadow system (NatureServe 2012)].	Is this bold text a typo?	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-133	28-34	The Rocky Mountain Alpine-Montane Wet Meadow system includes…	This ecological system would be better fit with the Wetland, Riparian, and Surface Water primary community.	The identification of wetland, riparian, and surface-water vegetation communities has been revised in the Final EIS to use the RCA methodology described in Section 3.2.3.4. The RCA methodology differs from classification of other vegetation communities by not relying on reclassified GAP data to identify community extents.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-135	1-5	Non-native grasslands typically are dominated by cheatgrass (*Bromus tectorum*); however, Medusahead rye (*Taeniatherum caput-medusae*) may become more prevalent at higher elevations where precipitation is greater. Non-native grasslands in Segment 1 occur in areas that have experienced past disturbance and occur in the analysis areas of the Proposed Action and alternative (Table 3-39).	Consider adding the percentages of native vs non-native grassland present in this segment to provide more insight. The data is available in Table 3-39.	The analysis of vegetation communities in the Affected Environment has been revised to include a general description of the distribution of vegetation communities within each segment, as well as the miles of each vegetation community type crossed by each action alternative.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-135	3-4, 7-8 and entire section for Segment 2 and other segments	Non-native grasslands in Segment 1 occur in areas that have…	There are multiple references to Segment 1, but this is a discussion of Segment 2. It looks like a copy/paste error from Segment 1. Make sure the discussion under each segment is appropriate. From Table 3-39, it looks like Segment 2 has very little non-native grassland present within the analysis area and would be good to mention.	Revised
3.2.3.5 Vegetation	p. 3-135	7-10	Shrubland communities comprise about a quarter the	An introductory paragraph on shrublands in general is not necessary	Text describing vegetation community subtypes and the ecological

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Resources/Affected Environment			analysis areas of the Proposed Action and all alternatives in Segment 1 (Table 3-38; Figure 3-9). Although all shrubland subtypes are represented in the analysis areas, Big Sagebrush Steppe and Mountain Shrub subtypes are the most predominant (Table 3-40).	(and is confusing) in the Segment 2 section. Just discuss Segment 2 shrublands and remove the reference to Segment 1.	systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-135	13-14	Although Great Basin Xeric Mixed Sagebrush Shrubland also occurs in Segment 2, these big 13 sagebrush shrublands will be discussed in Segment 3 where they are more dominant.	Include each discussion in the order of appearance/occurrence in the document. It would make more sense to include this vegetation type in the segment 2 discussion and reference it in the segment 3 discussion. As a reader this would improve the flow of the document.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to an previous portion of the Affected Environment section to emphasize the broad nature of the descriptions.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-135	23-24	"…"(Artemisia tridentata ssp. Vaseyana), silver sagebrush (A. cana ssp. Viscidula), and related taxa such as big sagebrush (Artemisisa tridentata ssp. Spiciformis)."	Subspecies names should not be capitalized.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-136	6-7	Desert Shrub occurs on the western portion of the Segment 2 and is a minor component of the vegetation community within the analysis areas (Table 3-40).	Of all shrublands, this is the first one in Segment 2 to be related to its actual location within the Proposed Action and/or the Alternative. The relationship of where these occur is helpful; however, its use is inconsistent within the document. Add additional discussion on where vegetation communities occur within each segment.	The analysis of vegetation communities in the Affected Environment has been revised to include a general description of the distribution of vegetation communities within each segment, as well as the miles of each vegetation community type crossed by each action alternative.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-136	7-11	Similar to Segment 1, the Inter-Mountain Greasewood Flat ecological system occurs in negligible amounts in Segment 2, and is described in Segment 5 below where its discussion in more appropriate. Dwarf Sagebrush Steppe also occurs in Segment 2 (Table 3-40); however, these shrublands are described in Segment 3 where they are more common and their discussion is more appropriate.	Include each discussion in the order of appearance/occurrence in the document. It would make more sense to include this vegetation type in the segment 2 discussion and reference it in the segment 3 discussion. As a reader this would improve the flow of the document. The term "in" should be "is."	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-136	13-18	old growth	There are specific definitions for old growth. Do the forests indicated meet the definitions for old growth and how is it known? It would be helpful to include appropriate citations. The only other mention of old growth is under issues on page 104 line 20. If there aren't any impacts to old growth, this should be disclosed under the Environmental Consequences section.	This section has been updated.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-136	22-23	Juniper and Mahogany Woodlands also occur in Segment 2, but will be discussed in Segment 3 where they comprise a major Forest/Woodland subtype and their discussion is more appropriate.	Include each discussion in the order of appearance/occurrence in the document. It would make more sense to include this vegetation type in the segment 2 discussion and reference it in the segment 3 discussion. As a reader this would improve the flow of the document.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-136	34-37	Most occurrences of this system are dominated by a mix of *Pseudotsuga menziesii* and *Pinus ponderosa.* The nature of this forest system is a matrix of large patches dominated or co-dominated by one or combinations of the above species; *Abies grandis* (a fire sensitive, shade-tolerant species) has increased on many sites once dominated by *Pseudotsuga menziesii* and *Pinus ponderosa*, which were formerly maintained by low-severity wildfire.	Common names should be used with scientific names in parentheses. Be consistent throughout the document.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-138	18-22	The Northern Rocky Mountain Western Larch Savanna system is a large patch type restricted to the interior montane zones of the Pacific Northwest in northern Idaho.	Clarify if this system is found in the analysis area. This description indicates it is restricted to northern Idaho, which is outside of the analysis area. Describe where the Rocky Mountain Western Larch Savanna system intersects the project analysis area?	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The analysis of vegetation communities in the Affected Environment has been revised to discuss only vegetation community subtypes.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-138	23-29	Northern Rocky Mountain Mesic Montane Mixed Conifer Forest…	Clarify if this system is found in the analysis area. From the description in the text, it doesn't sound like it would be found in the analysis area.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The analysis of vegetation communities in the Affected Environment has been revised to discuss only vegetation community subtypes.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-140	19-27	The Inter-Mountain Basins Playa ecological system…	This ecological system would be better fit with the Wetland, Riparian, and Surface Water primary community.	The identification of wetland, riparian, and surface-water vegetation communities has been revised in the Final EIS to use the RCA methodology described in Section 3.2.3.4. The RCA methodology differs from classification of other vegetation communities by not relying on reclassified GAP data to identify community extents.
3.2.3.5 Vegetation	p. 3-141	3	"…Oregon that have been modified at low to medium	Re-write the sentence to clarify which areas are included.	Text describing vegetation community subtypes and the ecological

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Resources/Affected Environment			levels which primarily include areas."		systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	3-16	General Comment	Use of 'locations,' 'occurrence' and 'population' interchangeably in this paragraph is confusing. Is there a distinct population in the analysis area or an occurrence? What occurrence is protected by the Nature Conservancy—one near the project or somewhere else? Clarify and use consistent terms.	Text revised to define and consistently use the terms "population" and "occurrence," as well as describe the distribution and context of Howell's spectacular thelypody in the larger B2H Project area.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	7-15	Howell's spectacular thelypody (*Thelypodium howellii* ssp. *spectabilis*), also known as Howell's thelypody, was included as a federally threatened species on June 25, 1999 (64 Federal Register [FR] 28393). It is known from only Union, Baker, and Malheur counties, Oregon, with presently documented populations restricted to the Baker Powder Valley and the Willow Valley (Table 3-35). Howell's spectacular thelypody is found in alkali meadows that are seasonally wet in the spring; between 3,000 and 3,500 feet elevation. Thelypody habitat typically has not been disturbed by agriculture and is dominated by basin wildrye with greasewood and alkali saltgrass (*Distichlis stricta*) (USFWS 2002). It has a Global Status of G2T1 (critically imperiled) because of being a narrow endemic with much of the habitat having been destroyed and only a few historical populations remaining.	Add these two valleys to a figure and reference it in text. The extent of the valleys with the proposed and alternative actions would be helpful. Basin wildrye, greasewood and alkali saltgrass were not provided in any habitat description of the section. Clarify if this habitat occurs in this segment. Clarify if this habitat is found in the Great Basin Xeric Mixed Sagebrush shrubland, Desert Shrub or the Inter-Mountain Greasewood Flat ecological systems. These ecological systems have been stated to occur within this segment but are stated to be in uncommon or in negligible amounts. If these ecological systems are the preferred habitat of Howell's thelypody and they are found within this segment, please include a discussion.	Due to the threats posed by disturbance and collection, as well as the uncertain location information for several occurrences, location specific information for special status plants is not included in the Final EIS. The analysis of effects to Howell's spectacular thelypody has been revised to be based on known occurrences and does not discuss potential habitat as identified by vegetation community.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	15-16	Of the 12 documented populations, only 2 are protected (USFWS 2002).	Reference is from 2002, please clarify if is this still true for 2015? Is this the most recent data available?	The analysis of Howell's spectacular thelypody in the Affected Environment section has been revised to use the most recent data available.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	21-22	There are two known occurrences of Howell's spectacular thelypody within the 5 miles analysis area of the Proposed Action and alternatives in Segment 2. However, there are no known occurrences within the right-of-way.	The ROW is not used for the other segments as a unit of analysis. If the ROW is used in Segment 2 to exclude affects on an SSP, it should be used in the other segments to decide if SSPs will be affected by the Project as well. Be consistent across segments in both the Affected Environment and Environmental Consequences sections.	The analysis of Howell's spectacular thelypody in the Affected Environment section has been revised to be consistent with the analysis areas used for other special status plant species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	22-23	within the right-of-way	Add the word "proposed" before right-of-way.	The analysis of Howell's spectacular thelypody in the Affected Environment section has been revised to no longer discuss known occurrences relative to the 250-foot right-of-way.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	25-27	Although four special status species are known to occur in Segment 2 (Table 3-36), only two species, Douglas' clover and Oregon semaphore grass, have been identified by the BLM as high priority species for detailed discussion.	Clarify what methods were used to determine priority species? No description is provided indicating why 2 plants were chosen and 2 plants were excluded as high priority.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141 and 142	28-38 and 1-16	General Comment	Provide an analysis or discussion regarding how the project may affect high priority SSPs.	The analysis of B2H Project impacts on special status species has been revised in the Final EIS to use more clearly describe types of potential effects and the effectiveness of mitigation.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	29-24		Break this sentence into several sentences; it is very long and too much information for 1 sentence.	Text describing the life history of special status plant species has been moved to Appendix D – Vegetation Supporting Data and the sentence edited for clarity.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-141	37-38	Livestock grazing is a threat to the Oregon populations, but populations persist when grazing pressure is lessened.	Clarify, this statement contradicts itself.	Text describing the life history of special status plant species has been moved Appendix D – Vegetation Supporting Data and the sentence edited for clarity.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-142	9	dominated by *Deschampsia caespitosa* and *Deschampsia caespitosa-Hordeum brachyantherum*	Common names should be used with scientific names in parentheses. Be consistent throughout the document.	Text describing the life history of special status plant species has been moved to Appendix D – Vegetation Supporting Data and the text revised as recommended.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-142	22-31	Rush skeletonweed species account	Why is this account included and not others? What is the significance of this species account in relation to the current conditions? Clarify why only one out of 56 noxious weeds identified for this segment, has a descriptive account. Consider removing the account entirely.	Revised

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3.2.3.5 Vegetation Resources/Affected Environment	p. 3-143	2	Grasslands are the second largest vegetation community within Segment 2 (Table 3-38; Figure 3-10).	The Timber Canyon Alternative contains over three times as much forest/woodland than grassland, but is less than shrublands (51%). Suggest adding italicized text to fix: "Grasslands are the second largest vegetation community within Segment 2*, with the exception of the Timber Canyon Alternative*."	The analysis of vegetation communities in the Affected Environment has been revised to include a general description of the distribution of vegetation community subtypes within each segment, as well as the miles of each vegetation community subtype crossed by each action alternative.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-143	3-4	Native and non-native grassland subtypes occur roughly equally within the analysis areas of the Proposed Action and all alternatives (Table 3-39).	Clarify where native and non-native grasslands occur equally? Is it in Segment 2, Segment 3 or the entire project area?	The analysis of vegetation communities in the Affected Environment has been revised to include a general description of the distribution of vegetation community subtypes within each segment, as well as the miles of each vegetation community subtype crossed by each action alternative.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-143	14-15	Shrubland communities comprise the vast majority of the analysis areas of the Proposed Action and most of the alternatives in Segment 1 (Table 3-38; Figure 3-10).	Suggest changing to "most of the alternatives in Segment 3" since this is under the Segment 3 discussion. This is a repetitive mistake. Segment numbers are consistently not updated so it unclear which area is referred to—it looks like a copy/paste error. Update throughout this section.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The analysis of vegetation communities in the Affected Environment has been revised to discuss only vegetation community subtypes.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-144	28-31	Although all forest and woodland subtypes are represented in the analysis areas, the Juniper and Mahogany Woodland is the most predominant (Table 3-41). In general, the Mixed Conifer Forests and Rocky Mountain Aspen subtypes are more limited.	Table 3-41 indicates the Mixed Conifer is the most common for Timber Canyon. Update the text to match the table.	The analysis of vegetation communities in the Affected Environment has been revised to include a general description of the distribution of vegetation community subtypes within each segment, as well as the miles of each vegetation community subtype crossed by each action alternative.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-144	33	Proposed Action and most alternative; however…	Suggest updating to: "most alternatives."	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-146	1	Juniper and Mahogany Woodland in the most dominant Forest/Woodland subtype in Segment 3 (Table 3-41)	Clarify that this is the most abundant subtype except for the Timber Canyon Alternative. "in" should be "is"	The analysis of vegetation communities in the Affected Environment has been revised to include a general description of the distribution of vegetation community subtypes within each segment, as well as the miles of each vegetation community subtype crossed by each action alternative.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-146	21-25	It typically 21 occurs from 1,950 m to over 8,700 feet in elevation on rocky outcrops or escarpments and forms small-to large-patch stands in forested areas. Most stands occur as shrublands on ridges and steep rimrock slopes, but they may be composed of small trees in steppe areas	Juniper and mahogany classification vary in their shrubland/woodland/forested classification. Clarify why this is included in the Forest/Woodland community when the description states "most stands occur as shrublands…" I realize the difficulty and problems associated with classifying junipers and mahogany as shrubland or woodland, but a typical reader may wonder why it is grouped with forest/woodland after they read the previously presented quote. An explanation before segment descriptions or in woodland type would be beneficial.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions and revised to further discuss the rationale behind including the Inter-mountian Basins Curl-leaf Mountain Mahogany Woodland and Shrublands ecological system in the juniper and mahogany woodlands community subtype.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-146	22	1,950 m to over 8,700 feet	Convert the meters to feet and report in feet; use consistent units.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-146	37-38	The bare ground, cliffs, and talus ecological systems that occur within Segment 3 are more extensive in Segments 4 and 5 and will be discussed in more detail there.	Include each discussion in the order of appearance/occurrence in the document. As a reader this does much to improve flow of document.	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The analysis of vegetation communities in the Affected Environment has been revised to discuss only vegetation community subtypes.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-147	2-5	Although agriculture in the Baker Valley is an important economic activity, agricultural are relatively small land cover component within the analysis areas of the Proposed Action and alternatives in Segment 3 (Table 3-38; Figure 3-10). In general, row crops, pastures and hayfields make up the majority of these areas. This land cover type has been described previously in previous segments.	Revise this paragraph for clarity.	Text describing the agriculture vegetation community subtype has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. Specific types and extents of agricultural lands in Segment 3 are discussed in greater detail in the Agriculture and Land Use Resource sections.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-147	14-18	Although 19 special status species are known to occur in Segment 3 (Table 3-36), only three species, Cusick's lupine, Malheur prince's plume, and stalked moonwort, have been identified by the BLM as high priority species for detailed discussion. Only Malheur prince's plume and Snake River goldenweed are discussed in the Environmental Consequences.	Identify which species in Table 3-36 are considered BLM high priority. Provide reasoning for those considered BLM high priority. These three species are high priority, but only one of the three and another plant (not previously identified) are discussed below. Why? By what parameters are these included and others ruled out?	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor.
3.2.3.5 Vegetation Resources/Affected	p. 3-147	15-18	Special Status Species: Although 19 special status species are known to occur in Segment 3 (Table 3-	This section has conflicting information with which species are discussed and why. Cusick's lupine and stalked moonwort aren't	Discussion of sensitive plant species in the Final EIS has been revised to be consistent with the methods used to identify sensitive plant species in

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Environment			36), only three species, Cusick's lupine, Malheur prince's plume, and stalked moonwort, have been identified by the BLM as high priority species for detailed discussion. Only Malheur prince's plume and Snake River goldenweed are discussed in the Environmental Consequences.	discussed, but Malheur prince's plume and Snake River goldenweed are discussed. Revise to clarify which species are discussed.	the B2H Project area, described in Section 3.2.3.4.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-148	10-11	"…species is threatened by… water level fluctuation at Brownlee Reservoir"	Studies completed for the Hells Canyon Complex relicensing effort and corresponding reports[1] did not indicate Snake River Goldenweed was impacted by Brownlee Reservoir fluctuations. Snake River Goldenweed is an upland species, as indicated by the description in the DEIS, reservoir fluctuations would have minimal to no influence on upland plants. Remove this as a threat. [1]Holmstead, G. 2003. Vegetation of the Snake River Corridor in Hells Canyon—Weiser, Idaho, to the Salmon River. In: Technical appendices for new license application: Hells Canyon Complex. Boise, ID: Idaho Power. E.3.3-01. Krichbaum, R. 2000. E.3.3-2 Inventory of Rare Plants and Noxious Weeds Along the Snake River Corridor in Hells Canyon – Weiser, Idaho, to the Salmon River. In: Technical appendices for new license application: Hells Canyon Complex. Boise, ID: Idaho Power. Idaho Power. E.3.3-02. Braatne, J.H., S.B. Rood, R.K. Simons, L.A. Gom, G.E. Canali. 2002. Ecology of Riparian Vegetation of the Hells Canyon Corridor of the Snake River: Field Data, Analysis and Modeling of Plant Responses to Inundation and Regulated Flows. In: Technical appendices for new license application: Hells Canyon Complex. Boise, ID: Idaho Power. E. 3.3-03	Text describing the life history of special status plant species has been moved to Appendix D – Vegetation Supporting Data and the threats to Snake River goldenweed from fluctuating water levels in the Brownlee Reservoir removed.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-148	15-35	Noxious Weeds and Accounts	Provide reasoning for inclusion of puncturevine and purple loosestrife. Why were these two chosen over the others?	The analysis of noxious weeds has been revised in the Final EIS to identify the weed species present in the vegetation resources analysis area and qualitatively discuss commonly occurring noxious weeds by segment.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-148	26-35	General Comment-Purple loosestrife	As indicated in section 3.2.3.5, pg. 148, line 27, purple loosestrife "degrades wetlands." Segment 3 contains only 7.6% wetlands, riparian and open water (Section 3.2.3.5, Table 3-38). Also, as indicated in section 3.2.3.4, line 25-26, "Further refinement of the final right-of-way will include microsite changes that will avoid impacts to wetlands and surface waters to the greatest extent possible." It is very unlikely the project will increase purple loosestrife infestations to any extent and highlighting purple loosestrife in the Segment 3 noxious weed section is inappropriate.	The analysis of noxious weeds in the Affected Environment section for Segment 3 has been revised and no longer discusses purple loosestrife in detail.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-151	33-34	agricultural lands are least in extent along the Proposed Action	Revise this sentence for clarity.	Text describing the agriculture vegetation community subtype has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The analysis of vegetation communities in the Affected Environment section has been revised to describe vegetation communities relative to prominent features and landmarks in each segment.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-152	2-5	Developed areas in Segment 4 are primarily composed of rural areas on the periphery of Brogan and Vale, Oregon that have been modified at low to medium levels. These areas are primarily associated with rural residences and agricultural operations and are relatively limited within Segment 4 (Table 3-38).	Define low and medium levels of modification.	Text describing the developed/disturbed vegetation community subtype has been moved to a previous portion of the Affected Environment section and revised to discuss development and disturbance in the context of vegetation communities. The types and extent of development are discussed in greater detail in the land-use section.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-152	8-12	Special Status Species Although six special status species are known to occur in Segment 4 (Table 3-36), only three species, Cronquist's stickseed, Malheur prince's plume, and Snake River Goldenweed, have been identified by the BLM as high priority species for detailed discussion. The number of known populations of each species located within the analysis area and area of disturbance are	Provide reasoning why only three of the six total identified are considered priority. Clarify why there isn't a species account for Cronquist's stickseed or include it if it was inadvertently left out.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor. The species account for Cronquist's stickseed is included in Appendix D – Vegetation Supporting Data.

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			provided in Table 3-51.		
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-152	11-12	The number of known populations of each species located within the analysis area and area of disturbance are provided in Table 3-51.	This discussion of populations within the "area of disturbance" doesn't fit in the affected environment section, particularly since the Table is located in the Environmental Consequences section. Delete this sentence and report the number of known populations or occurrences for each species within the analysis area. Verify that this is consistent with what is reported in Appendix B and consider adding the number of occurrences in each species range, if known.	The analysis of sensitive plant species in the Affected Environment section has been revised for each segment to discuss the number of known occurrences for each species that occur within the analysis areas of each alternative route. Appendix D – Vegetation Supporting Data has been revised to be consistent with the species discussed in the Affected Environment section.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-152	14-15	Malheur Prince's Plume populations occur within the analysis areas of the Proposed Action and all alternatives (Table 3-51 in Section 3.2.3.6).	Malheur Prince's Plume is not discussed in all segments. Clarify if this statement refers to all segments or just segment 4? Also, table citation is out of order; please update.	The analysis of Malheur princes plume in the Affected Environment section has been revised for each segment to discuss the number of known occurrences for this species that occur within the analysis areas of each alternative route. The text has been revised.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-152	17-19	Snake River goldenweed has been described in Segment 3. With the exception of the Burnt River Canyon 138/69-kV rebuild alternative, Snake River goldenweed populations occur within the analysis areas of the Proposed Action and remaining alternatives (Table 3-51 in Section 3.2.3.6).	Burnt River Canyon alternative is within Segment 3 not Segment 4. This comment seems more appropriately placed in the discussion of that Segment. This statement makes the reader question whether it's referring to the Proposed Action and Alternatives in Segment 3, Segment 4, or all of the segments together. Also, table citation is out of order; please update.	The analysis of Snake River goldenweed in the Affected Environment section has been revised for each segment to discuss the number of known occurrences for this species that occur within the analysis areas of each alternative route. The text has been revised.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-152	20-24	Noxious Weeds 20 There are 56 noxious or invasive weeds documented as occurring within Segment 4. These plants include all those listed on federal, state and county noxious weed lists, although it is not a comprehensive list of every invasive plant species or noxious weed that could potentially occur within Segment 4.	This is the same description applied to other noxious weed sections; however, this one has no species account following. The others with species accounts provided descriptions with no reasoning as to why, now there are no accounts and the same very generic statement. Be consistent.	The analysis of noxious weeds has been revised in the Final EIS to identify the weed species present in the vegetation resources analysis area and qualitatively discuss commonly occurring noxious weeds relative to key landmarks and features in the segment.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-153	3-5	In general, native grasslands similar to those found and described in Segments 1 and 2 are relatively limited along the Proposed Action and alternatives in Segment 5; the Columbia Plateau Steppe and Grassland ecological system being the most common.	Instead of referencing ecological systems, it would be more beneficial to repeat actual composition (e.g. species, abundance, soil types, precip, etc.).	Text describing vegetation community subtypes and the ecological systems comprising them has been moved to a previous portion of the Affected Environment section to emphasize the broad nature of the descriptions. The analysis of vegetation communities in the Affected Environment has been revised to discuss only vegetation community subtypes to allow for streamlined discussion of impacts and effects on vegetation communities. This approach also allows for consistent discussion of effects on vegetation communities that can vary widely from one segment to another.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-155	14-16	Characteristic forbs are short-lived annuals, including *Cleome*, *Mentzelia*, *Camissonia*, and *Mimulus* species, although these habitats often support endemic perennial forbs (NatureServe 2012).	Use common names for plants and include the italicized scientific name in parentheses the first time the common name is used in text. Do not repeat the scientific name more than once.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-155	17-21	Inter-Mountain Basins Cliff and Canyon is found from foothill to subalpine elevations and includes barren and sparsely vegetated landscapes (generally <10 percent plant cover) of steep cliff faces, narrow canyons, and smaller rock outcrops of various igneous, sedimentary, and metamorphic bedrock types. Also included is vegetation of unstable scree and talus slopes that typically occurs below cliff faces.	Not entirely appropriate to refer to scree and talus slopes as vegetation. Suggest rewording for clarity.	Text describing the bare ground, cliffs, and talus vegetation community subtype has been moved to a previous portion of the Affected Environment section and revised to clarify that the subtype includes the vegetation contained in these areas.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-155 to 3- 157	33-13	Special Status Species	Again inclusion/exclusion of species is not explained. No explanation for the species with species accounts either. Clarify.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-156	16-17	Mulford's milk-vetch populations occur within the analysis areas of the Proposed Action and all alternatives (see Table 3-52 in Section 3.2.3.6).	Specify entire Proposed Action and all alternatives or just within the Segment being discussed? Also, table citation is out of order; please update.	The analysis of Mulford's milkvetch in the Affected Environment section has been revised for each segment to discuss the number of known occurrences for this species that occur within the analysis areas of each alternative route. The text has been revised.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-156	23-27	*Artemisia tridentata* / *Poa secunda* Shrubland, *Artemisia tridentata* / *Poa secunda-Pseudoroegenaria spicata* Shrubland, *Artemisia tridentata-Purshia tridentata* / *Pseudoroegeneria spicata-Poa secunda Achnatherum hymenoides* Shrubland and *Artemisia tridentata* / *Bromus tectorum-Poa secunda-Festuca idahoensis-Achnatherum hymenoides* Semi-natural Shrubland (OFP 2012, NatureServe 2013).	Use common names for plants and include the italicized scientific name in parentheses the first time the common name is used in text. Do not repeat the scientific name more than once. Clarify and define what vegetation associations are as someone who has not worked with vegetation associations likely will not understand the shorthand way that it is written.	Revised; the species account description for Cronquist's stickseed has been moved to Appendix D – Vegetation Supporting Data and revised to discuss commonly co-occurring species without referencing formal vegetation associations.
3.2.3.5 Vegetation	p. 3-156	30-31	Cronquist's stickseed populations occur within the	Clarify that this claim is only valid within the current segment. This	The analysis of Cronquist's stickseed in the Affected Environment section

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Resources/Affected Environment			analysis areas of the Proposed Action and all alternatives (see Table 3-52 in Section 3.2.3.6).	recurring use of "occurring within the analysis areas of the Proposed Action and all alternatives" leaves the reader wondering whether this is true for the entire project (all alternatives). To double check, the table cited is 30 pages away.	has been revised for each segment to discuss the number of known occurrences for this species that occur within the analysis areas of each alternative route. A table summarizing sensitive plant species occurrence information by alternative route has been included for each segment.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-157	6-10	Oregon populations total at least 37,000 plants. Many occurrences are located in areas with mining claims. Habitat degradation threats include mineral exploration, off-road vehicle recreational activity, and range improvement programs. Smooth mentzelia does not germinate easily on compacted soil (e.g., by off-road vehicles). It does recolonize after disturbance if soil is permeable (NatureServe 2013).	Clarify. Statements may conflict - most occurrences in areas with mining claims but habitat threat is mineral exploration. Explain this relationship more, right now it is vague and could be construed as conflicting. Clarify how range improvement programs degrade habitat. Elaborate on that relationship.	The species account description for smooth mentzelia has been moved to Appendix D – Vegetation Supporting Data and revised to clarify threats to the species.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-157	10-12	With the exception of the Double Mountain Alternative, Smooth mentzelia populations occur within the analysis areas of the Proposed Action and remaining alternatives (see Table 3-52 in Section 3.2.3.6).	Clarify this statement; smooth mentzelia is not present in all segments. This statement makes it appear like it is found throughout Proposed Action and all alternatives, when it is only found in Segments 5 and 6. Table citation is also out of order. Clarify.	The analysis of smooth mentzelia in the Affected Environment section has been revised for each segment to discuss the number of known occurrences for this species that occur within the analysis areas of each alternative route. The text has been revised.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-157-158	18-39 & 1-2	General Comment	Clarify why were only 4 of the 47 weeds found in segment 5 discussed in detail?	The analysis of noxious weeds has been revised in the Final EIS to identify the weed species present in the vegetation resources analysis area and qualitatively discuss commonly occurring noxious weeds relative to key landmarks and features in the segment.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-157	23	OSA (2012b)	Should "OSA" be "ODA?" Verify and include the correct reference in Chapter 6.	The analysis of noxious weeds in the Affected Environment section for Segment 5 has been revised to no longer discuss musk thistle in detail or include the reference referred to in the comment.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-158	12	Bare ground, cliffs and talus and agriculture also contribute to the land cover within Segment 6.	Every vegetation community is present in the Proposed Action and all alternatives in every segment. These are all contributing to land cover. Forest/woodland makes up 8 acres out of the 15,441 acre analysis area-it is contributing to land cover. Clarify the significance/importance. In this case the bare ground, cliffs, talus equals 497 acres (3%); developed/disturbed equals 162 acres (1%); agriculture 366 acres (2%)….Out of 15,441 acres total. Clarify the significance.	The analysis of vegetation communities in the Affected Environment has been revised to include a general description of the distribution of vegetation community subtypes within each segment, as well as the miles of each vegetation community subtype crossed by each action alternative. This analysis has been revised to clarify which vegetation communities are crossed in greater extents than others.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-158	34-36	The woody layer is often a mixture of shrubs and dwarf-shrubs, although it may be dominated by a single species. Shadscale (*Atriplex canescens*), and big sagebrush are characteristic shrub species but do not dominate.	If these characteristic species are never the single dominant species, what is/are the shrubs that can dominate? Revise to clarify.	The text describing the Inter-mountain Basins Semi-desert shrub-steppe has been moved to an earlier portion of the Affected Environment section and has been revised to identify other types of dominant vegetation.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-159	1-5	Forbs are generally of low importance and are highly variable across the range but may be diverse in some occurrences. The general aspect of occurrences may be either open shrubland with patchy grasses or patchy open herbaceous layers. Disturbance may be important in maintaining the woody component. Microphytic crust is very important in some stands (NatureServe 2012).	Entire section has vague claims that lack explanation. Clarify and provide citations. Clarify and cite the claim that forbs are of generally low importance or remove this statement. Vegetation communities, pollinators, and wildlife often benefit from a diversity of forbs. Consider removing this statement. Highly variable implies diversity. Re-word if forb communities are indeed locally lacking diversity and most have a simple/homogenous forb community where the most abundant species changes across the proposed action area. Clarify the statement about "general aspect of occurrences." Clarify and elaborate on the last two sentences. What kind of disturbance? How does it maintain woody component? Why is microphytic crust very important only in some stands?	The text describing the Inter-mountain Basins Semi-desert shrub-steppe has been moved to an earlier portion of the Affected Environment section to emphasize the broad nature of the description. The description has been revised to clarify the species composition and typical appearance.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-159	16-18	Riparian areas along various canyon bottom streams and surface water occur within the Segment 6 analysis areas (Table 3-38). Riparian communities are similar to those described previously in Segment 2.	Delete these 2 sentences since this is the Bare Ground, Cliffs, and Talus description and these 2 sentences look like they were copied and pasted from Wetland, Riparian, and Surface Water description above.	This section has been updated.
3.2.3.5 Vegetation Resources/Affected Environment	p. 3-159	27-30	Special Status Species	Clarify why only 3 species of the 18 known warrant discussion. Is the description for Special Status Species missing for this Segment? All other segment descriptions for Special Status Species either have a description of the high priority species or refer to the segment that has a	The analysis of sensitive plant species in the Affected Environment section has been revised for each segment to discuss the number of known occurrences for each species that occur within the analysis areas of each alternative route. Appendix D – Vegetation Supporting data has

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				description. Clarify.	been revised to be consistent with the species discussed in the Affected Environment section.
3.2.3.5 Vegetation Resources/Affected Environment	General Comment			Is there a reason that the tables/analysis from the Resource Report are not included in the Affected Environment section? Why were new tables created when the existing tables from the resource report contain the same information (slightly different habitat groupings)?	The vegetation community classification has been revised for the Final EIS based on direction from the BLM and no longer reflects the analysis tables contained in the Resource Report. A crosswalk table providing greater detail is included in Appendix D – Vegetation Supporting Data.
3.2.3.5 Vegetation Resources/Affected Environment	General Comment			Include the acreage for the area of impact within the entire proposed route and/or segments of the line for context. This was provided in the resource report; however, it is not included in the DEIS.	The vegetation community classification has been revised for the Final EIS based on direction from the BLM and no longer reflects the analysis tables contained in the Resource Report. A crosswalk table providing greater detail is included in Appendix D – Vegetation Supporting Data.
3.2.3.6 Vegetation Resources/Envtl. Consequences	General Comment			The "analysis" in the Environmental Consequences section is lacking substance. More fine-scaled analysis was provided in resource report and not used. Include the additional analysis provided in the resource report and cite the report.	The vegetation community classification has been revised for the Final EIS based on direction from the BLM and no longer reflects the analysis tables contained in the Resource Report. A crosswalk table providing greater detail is included in Appendix D – Vegetation Supporting Data.
3.2.3.5 Vegetation Resources/Affected Environment	General Comment			Fire regimes are repeatedly mentioned as shaping the ecosystems; however, there is no further investigation or elaboration on this topic. Clarify and include appropriate references. Include a description of the fire history within the analysis area of the Proposed action and all of the alternatives. This would be useful information with regards to existing condition and past disturbances.	The Final EIS has been revised to include descriptions of fire regimes and the effects of past fires on vegetation communities.
3.2.3.5 Vegetation Resources/Affected Environment	General Comment			Include each discussion of vegetation communities in the order of appearance in the document to improve the flow of the document. Moving the descriptions to sections where they are "more abundant" or "appropriate" creates a scavenger hunt through the rest of the segment descriptions.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	General Comment			The Special status species and noxious weed sections include species accounts seemingly at random. Clarify the inclusion and/or exclusion of species. Provide reasoning for these species accounts in the different sections.	Revised
3.2.3.5 Vegetation Resources/Affected Environment	General Comment			Subtypes of communities are inserted with no real method. Consider organizing them from most abundant to least abundant to give the reader a better idea of what's going on.	The analysis of effects on vegetation communities has been revised to more clearly discuss effects on vegetation community subtypes.
3.2.3.5 Vegetation Resources/Affected Environment	General Comment		This land cover type has been described previously in previous segments.	Clarify. This sentence is repetitive and re-occurring within the document. Consider updating to: "This land cover type has been described in previous segments."	The analysis of vegetation communities has been updated and no longer uses the referenced language in the Final EIS.
3.2.3.5 Vegetation Resources/Affected Environment	General Comment			Vague referencing in sweeping statements leaves room for (mis) interpretation. e.g., "…populations occur within the analysis areas of the Proposed Action and all alternatives." –Does this mean the rest of the Proposed Action for the entire line or just for that segment? Clarify and provide additional references as needed.	The special status plant species analysis has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	General Comment		Impacts to (Vegetation community) within the right-of-way are roughly proportionate to their availability in the analysis areas (Table 3-38 and Table 3-43, 3-44).	This is a recurring statement in this section of the document. Clarify by providing the acreage for the expected impact. The tables presented in these sentences are acreage of communities within the ROW and Analysis Area. The entire ROW will not be impacted and using this information of acreage within ROW interchangeably with impact within ROW is incorrect. Not providing acreage of expected impact is puzzling, especially since this information was provided in the available resource report. Even more so was that it was not re-worked and not referenced.	The analysis of effects on vegetation communities in the Environmental Consequences section has been updated to include acres of expected disturbances to each vegetation community subtype by segment. The expected disturbance was calculated using a predictive model estimated from expected project features, not the entire right-of-way.
3.2.3.6 Vegetation Resources/Environmental Consequences	General Comment	Tables: 3-47; 3-48; 3-49; 3-50; 3-51; and 3-52	Analysis Area and Disturbed Area Acreage	These tables inaccurately report disturbance acreage. They assign the entire ROW as the Disturbed Area. Table 4.3-1 from the RR indicates that the highest estimate for disturbance during construction for Segment 2 is 171 total acres during construction. The highest disturbance during post-construction maintenance is 15 acres. This is a significantly smaller area than reported in the 1,382 acres of disturbed area (table 3-48) found in the DEIS, which is actually just the acreage of the ROW within Segment 2. Use the disturbance footprint in the analysis instead of the ROW since not all portions of the ROW would not be disturbed and some features outside of the ROW may be disturbed. Applying this same area of impact to impacts on Federally Listed	The analysis of effects on vegetation communities in the Environmental Consequences section has been updated to include acres of expected disturbances to each vegetation community subtype by segment. The expected disturbance was calculated using a predictive model estimated from expected project features, not the entire right-of-way. The analysis of effects on special status plants has been updated in the Final EIS and no longer assumes direct impacts on special status plant occurrences in the right-of-way.

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				Species and Special Status Species is misleading. The current analysis is misleading: occurrences within the Analysis Area vs occurrences within the ROW and then assigning a percentage to the proportion within the ROW and saying it's directly impacted. As described above, the entire ROW will not be disturbed. The labels used in these tables are incorrect and very misleading. Revise and clarify.	
3.2.3.6 Vegetation Resources/Environmental Consequences	General Comment			The analysis and effects provided in this entire section are based upon acreage within the ROW vs in the Analysis Area. Basing analysis on the idea that the entire ROW will be disturbed ignores nearly all materials provided by Idaho Power (POD) and Tetra Tech (Resource Report) that would provide more insight into the impacts of this Project. These materials also provide information that conflict with nearly all tables and claims made in this section.	The analysis of effects on vegetation communities in the Environmental Consequences section has been updated to include acres of expected disturbances to each vegetation community subtype by segment. The expected disturbance was calculated using a predictive model estimated from expected project features, not the entire right-of-way.
3.2.3.5 and 3.2.5.6 Vegetation Resources/ Affected Environment & Environmental Consequences	General Comment			Define the in-text usage of "populations" and "occurrences." Use consistent terminology and clarify if these refer to the same thing.	Revised
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 162/Table 3-42	Whole Table	Intensity of Impacts and Descriptions	Revisit and reassess the definitions and descriptions to ensure they are adequate and consistently applied. Provide clarification in the descriptions such as defining what "other nonlisted plants" are and clarifying "results in a population or species-level effects." Define "biologically important plant habitats." Clarify or remove the asterisk in front "*Introduction of new noxious weed…" Consider defining temporary disturbance to vegetation that would be revegetated as described in the revegetation plan.	The section has been revised.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-162	6-15	Effects Common to All Alternatives	Clarify impacts related to construction, operation and maintenance, and decommissioning the Project.	The section has been revised in the Final EIS and the types of potential effects common to all alternatives discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-162	10-15	Vegetation Communities Section: Construction will permanently remove existing vegetation	Clarify that vegetation would be temporarily removed during construction in areas that would not contain operations facilities. Areas with temporary disturbance would be revegetated as described in the revegetation plan. Reference design features that are proposed to minimize and reduce impacts, such as REC-1 to REC 16 in Appendix C. Be consistent with the definitions for impact duration defined on page 3-162 lines 2-5.	The section has been revised in the Final EIS and the types of potential effects common to all alternatives discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-163 to 3- 165	All veg sections	General Comment	Include references/citations for the estimated number of years it will take each vegetation type to recover.	The section has been revised in the Final EIS and no longer references duration of short-term or long-term effects.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-163	18-26	Fugitive dust	Reference applicable design features that are proposed to minimize and reduce the amount of fugitive dust, such as TR-2 in Appendix C.	The section has been revised in the Final EIS and the applicable design features to avoid and minimize disturbace discussed.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-163	26	There for	Update to "Therefore."	The section has been revised.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-163	31	could render the habitat unsuitable for special status species	Clarify why the habitat would be rendered unsuitable.	The section has been revised in the Final EIS and the types of potential effects on special status plant discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-163	33-35	Except for the footprints of permanent project facilities, the majority of impacts to grassland communities would be short-term in duration due to a relatively short recovery period of 1 to 3 years.	Provide a citation Reference for the short recovery time of 1-3 years. This can be found in the Vegetation RR. Include citations throughout this section where they are lacking. Citations are lacking for Section 3.2.3.6 (pages 3-164 through 3-192).	The section has been revised in the Final EIS and no longer references duration of short-term or long-term effects.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-164; p. 3-171	5; Table 3-45	Tall	Clarify "Tall" Sagebrush Steppe subtypes. The Affected Environment section does not describe "Tall" Sagebrush Steppe subtypes. "Big" Sagebrush Steppe is described. Clarify if these are the same and please use consistent terminology to avoid confusion.	Text revised to use Tall Sagebrush Steppe consistently.

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3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-164	1-22	Shrublands and Forests/Woodlands sections	Include design features that are proposed for reduction of impacts, such as revegetation. Clarify that there would be changes to vegetation composition, but not permanent removal of vegetation, in areas without operation features and facilities. These areas would change in composition to early seral vegetation types, based on the BLM-approved plant species that would be part of revegetation activities post construction. Be consistent with the definitions for impact duration defined on page 3-162 lines 2- 5.	The section has been revised in the Final EIS and the types of potential effects on special status plant discussed in Section 3.2.3.4. Short-term and long-term duration of effects are no longer discussed.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-164	23-33	Wetlands, Riparian, Surface Water section	Clarify this section to remove the conflicting information. The impacts are stated to range from low to moderate and would be short- to long-term. Later, impacts are described as permanent. Finally, it is disclosed that all disturbed wetlands would be reconstructed, rehabilitated and/or otherwise recovered. Be consistent with the definitions for impact duration defined on page 3-162 lines 2-5.	This section has been revised in the Final EIS to discuss effects on RCAs.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-164	26-28	Impacts to wetlands and riparian areas would result from the loss of habitat for non-listed plant species and permanent loss of biologically important plant habitats	Clarify "non-listed plant species" and "permanent loss." The previous sentence (lines 24-25) describes the impacts as "short-to long-term." Clarify that areas disturbed during construction would be revegetated. Clarify the impacts in areas that would have operation features and facilities and please be consistent with the definitions for impact duration defined on page 3-162 lines 2-5.	This section has been revised in the Final EIS and the types of potential effects on vegetation communities, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-164	36	may be difficult to restore	Include a citation for this statement and provide additional information about "restoration."	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-165	18	thought to be present in the analysis area	Clarify why it is "thought to be present" when Table 3-35 indicates the species is known to occur within in the analysis area.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-165	19-24	soil storage	Reference the applicable design features and Appendix C.	This section has been updated in the Final EIS to discuss the application of design features and mitigation measures to reduce effects on special status plant species.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-165	28	"…and/or the alteration of local fire regimes"	Clarify if and how the project alters local fire regimes?	This section has been revised.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-165	30-34	It is likely that despite avoidance efforts, at least one special status species population will be impacted by the Proposed Action or alternatives. Direct impacts would result in the loss of a population and dependent on the species have an effect on the species as a whole.	This statement implies that an entire population of a special status plant would be lost. Clarify analysis methodology. Clarify that direct impacts could include removal of individual plants, the seed bank, and potential habitat, but based on avoidance and design features (reference Appendix C) entire populations are not anticipated to be disturbed or lost.	This section has been revised in the Final EIS and the types of potential effects on vegetation communities, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-166	1-23	Noxious weeds	Include citation/references for these statements.	This section has been revised in the Final EIS and the types of potential effects on vegetation communities, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-166	24-27	Ultimately, Idaho Power would be responsible for the control of noxious weeds that are spread or introduced as a result of the construction and operation of the B2H Project.	Change to "would be responsible for the control of noxious weeds that <u>could be</u> spread or <u>introduced.</u>"	This section has been updated in the Final EIS and the potential spread and introduction of noxious weeds is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-166	24-27	Ultimately, Idaho Power would be responsible for the control of noxious weeds that are spread or introduced as a result of the construction and operation of the B2H Project.	Reference the design features that would help reduce the potential for introduction and spread of noxious weeds.	This section has been revised in the Final EIS and the types of potential effects on vegetation communities, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-166	31	invasive plant	Change to "noxious weed."	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-166	32-35	references to plans	Add a reference to Appendix E of the POD which includes the EPMs that would be implemented to limit noxious weed transport.	This section has been revised in the Final EIS and the application of design features and mitigation measues to reduce effects associated with the establishment and spread of noxious weeds is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-167	1-17	Impacts on first foods and ethnobotanical resources would range from low to moderate, and short- to long-term depending on source vegetation community composition.	Clarify and be consistent. The first sentence says low to moderate, however the following sentences describe the impacts as moderate to high. This section is not consistent with the vegetation communities' analysis for this Segment, despite reference to it. The wetlands, riparian, and surface water impacts described under the communities are described as low to moderate, however in the first foods section	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.

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				they are described as moderate to high. Clarify the impacts and please be consistent with the criteria and definitions on page 3-162.	
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-167	25	The analysis area of Segment 1 contains an imperiled native grassland vegetation community	Clarify the "imperiled native grassland vegetation community." Clarify the regulatory framework and management requirements for imperiled vegetation communities in the regulatory framework section to provide context for this reference and other references to imperiled vegetation communities.	This section has been revised.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-167	27-31	The effects to vegetation communities would be low to moderate due to the low percentage of available community types impacted by the Proposed Action and alternatives. However, where impacts to rare plant associations or communities supporting high priority special status species occur the impacts would be high.	Explain how the low percentage of available community types effects the impacts to vegetation communities. Reference a table of acres of expected impacts for the proposed action and alternatives.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-167 and 3-168; Table 3- 43.	33-36	Vegetation Communities Agricultural land is the primary land cover type potentially affected by the Proposed Action and alternatives in Segment 1 (Table 3-43). Shrubland and grassland vegetation communities could also be impacted to a lesser degree.	There is no analysis or quantitative description of this claim. This "analysis" is a finer scale re-working of the Habitat within analysis areas to habitat within the ROW. It shows an amount of acreage within ROW, but to base impacts solely on amount is not the same as impact/disturbed areas. Actual impacts to vegetation and habitat was provided within the Resource Report.	The analysis of effects on vegetation communities in the Environmental Consequences section has been updated to include acres of expected disturbances to each vegetation community subtype by segment. The expected disturbance was calculated using a predictive model estimated from expected project features, not the entire right-of-way.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-168/ Table 3-43 p. 3-170/ Table 3-44 p. 3-171/ Table 3-45	Table Titles	within the Right-of-Way of the Proposed Action and Alternatives	Define and describe in text or consider calling this "disturbance area" or "construction footprint." Clarify if other project features that would be disturbed during construction and/or operation are included in this.	Tables have been updated in the Final EIS to accurately describe contents.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-169	5-10	The removal of vegetation associated with construction of new roads in the right of way, towers, fly yards, and pads would result in the permanent loss of vegetation Native grasslands in all Segment 1 analysis areas consist of the Columbia Basin Palouse Prairie ecological system, a critically imperiled native community. The initial direct and indirect effects to this ecological system through vegetation removal and potential introduction of noxious weeds to a native landscape would be long-term and high, potentially resulting in the permanent loss of a biologically important habitat type	Clarify how much vegetation would be removed and/or impacted. Include the number of acres of expected impact out of the number of acres in the analysis area for context. The RR has this information. Clarify that the Columbia Basin Palouse Prairie ecological system is not critically imperiled. Clarify that the ecological system contains a critically imperiled vegetation association *Hesperostipa comata– Poa secunda*; however, this association itself is the only thing imperiled as both species individually are secure. Referencing the entire ROW as the impact/disturbed area is inaccurate. The RR (with actual expected impact acreage Table 4.3-1) shows the highest estimate for damage to native grassland within the proposed or any alternative is 6 acres out of a total 215-227 acres of native grassland within the ROW. Total native grassland in the DEIS Table 3-44 includes acres within the ROW, not the expected impact acreage. This last example shows that the language of the "permanent loss of a biologically important habitat" is inappropriate. Clarify; it is unlikely the entire Columbia Basin Palouse Prairie habitat type will be lost from a 100 to 250 foot right-of-way and corresponding access roads. Also, as discussed in section 3.2.3.6, pg. 166, lines 31-35, there are methods in place to limit noxious and invasive plant spread during construction. Include these methods in this discussion.	The analysis of effects on vegetation communities in the Environmental Consequences section has been updated to include acres of expected disturbances to each vegetation community subtype by segment. The expected disturbance was calculated using a predictive model estimated from expected project features, not the entire right-of-way. The assement of the level of effects on vegetation communities has been updated in the Final EIS and is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-169	17-18	Construction of the Proposed Action or alternatives would have low to moderate, long-term effect on shrublands within Segment 1 (Table 3-43). Although the Longhorn Variation would impact the most shrubland acreage (Table 3-45), it is the agency and environmentally preferred alternative	Clarify why no rating is given for the effect of the Longhorn Variation. Clarify and explain why the Longhorn Variation is the preferred alternative. Clarify "The Longhorn Variation would affect nearly 25 percent more shrublands than the Longhorn Alternative which affects the least amount of shrublands in Segment 1."	The analysis of effects on vegetation communities by route and variation has been updated in the Final EIS.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-169	35	There are no federally listed or candidate species that occur within Segment 1.	Clarify if this is the analysis area or disturbance area. Clarify and be consistent with terminology throughout the section.	Revised
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-170 p. 3-171	16 1-2	The percentage of available habitat impacted is equal across all alternatives. However, the Proposed Action impacts the greatest acreage of this community 1 type.	Clarify the impact acreage for context. Instead, this should indicate that the percentage of available habitat is equal across all alternatives.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental	p. 3-171	1-3	The potential conversion of habitat for special status species through the introduction of noxious weeds	Clarify how there would be a conversion of habitat through introduction of noxious weeds and high long-term impacts when earlier it was	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of

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Consequences			would result in high, long-term impacts to special status species in Segment 1.	mentioned that following the use of design features designed to reduce the potential introduction and spread of noxious weeds the impacts would be low? Reference design features that would reduce the impacts to low as described earlier (page 3-167 lines 31-32).	design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-171	6-8	Weedmapper (2012) 6 documents each of these species along the Proposed Action with diffuse knapweed, purple loosestrife, 7 spotted knapweed, and yellow starthistle documented along the Longhorn Alternative.	Clarify and define Weedmapper. If this tool is used in the analysis and discussion in the Environmental Consequences section, please reference and define what it is and why it is used in the in the Affected Environment section.	This section has been updated in the Final EIS and the sources used to identify known noxious weed locations discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-171	11	long-term and high	Reference design features that would reduce the impacts.	Revised
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-172	2-3	The right-of-way areas of Segment 2 contain forest/woodlands communities that are slow to regenerate and provide high value special status species habitat.	Clarify this statement. Of the 3 special status species in this segment, only Douglas' clover is listed as Forest/Woodland primary vegetation community in Table 3-36. Refer to earlier comment concerning the habitat description for Douglas' clover. This species is typically found in wetland and riparian areas, not Forest/Woodland. Clarify if any special status plants are found in Forest/Woodland communities for this Segment.	The table referenced by the comment has been revised to no longer identify the vegetation community where Douglas' clover, or any other special status plant, is likely to occur. The analysis of special status plants has been updated to discuss known occurrences.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-172	18	The initial direct and indirect effects	Clarify the term "initial." Reference design features that would reduce the impacts. At the beginning of this paragraph impacts are described as low, short-term, then it says long term and high. Clarify and be consistent.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats are discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-173	15	moderate to high, and short-to long-term	Clarify and be consistent. Earlier, on page 3-164 lines 24-25, it indicates that impacts would range from low to moderate. These statements conflict with one another.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-174	24-25	resulting in a potential 33 percent loss of population in this segment.	Clarify what the 33 percent loss refers to and how it was calculated. Clarify this throughout this section as it is unclear what the column "% Directly Impacted" refers to.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-175	1-8	Douglas' clover section	Clarify; it is unclear what is meant by the number of populations present and how much loss would occur from the Project. Clarify that with avoidance and micro siting (Design features in Appendix C OM-14 and PRC-8), impacts would be reduced.	Revised
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-175	2-3	alter remaining habitat rendering it unsuitable to sustain a population.	Clarify how the remaining habitat would be rendered unsuitable to sustain a population? Clarify the size of the existing population compared to the area of potential impact.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats are discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-175	3-4	Noxious weed infestation due to ground disturbance and potential introduction from construction equipment or other sources would permanently degrade suitable habitat.	Explain how and why there would be a noxious weed infestation that would permanently degrade suitable habitat when design features are in place to help reduce impacts from noxious weeds? Reference the design features that would reduce potential impacts.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of design features and selective mitigation measures to avoid and minimize effects are discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-175	25-26	The right-of-way areas of Segment 3 contains forest/woodlands and shrublands communities that are slow to regenerate and provide high value special status species habitat.	According to the Affected Environment section, no high priority special status plant species in Segment 3 are found in forest/woodlands, so please clarify or remove this reference.	The table referenced by the comment has been revised to no longer identify the vegetation community where a special status plant is likely to occur. The analysis of special status plant species has been updated in the Final EIS to discuss jurisdiction, conservation status, known occurrence location relative to project features, and the application of design features and selective mitigation measures to reduce effects.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-175	29-30	The effects to grassland and shrubland vegetation communities would be low to moderate depending on the dominant species affected.	Clarify "depending on the dominant species affected."	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-176	32	permanent and moderate	For Segment 2, impacts to forests/woodlands are referred to as moderate and long-term. Wouldn't the impact be the same for Segment 3 for forests/woodlands? Clarify and be consistent with the definitions for impact duration defined on page 3-162 lines 2-5.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-177	1-2	moderate to high, and short-to long-term	Earlier, on page 3-164 lines 24-25, impacts are described as low to moderate. Clarify; this statement conflicts with the other.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-177/Table 3-49; Entire Section 3.2.3 and Appendix B.3	11-13 and Table Title	Howell's Spectacular Thelypody and Total No. in Analysis Area	Clarify and use consistent terms. In the Affected Environment section "occurrences" are used, but this table and section uses the term "populations." If using the occurrences from ORBIC, "occurrences" would be preferable to "populations." Page 3-147 line 12-13 indicates that there are no occurrences of the Howell's Spectacular Thelypody in Segment 3, but Table 3-49 indicates that there are up to 8 populations within the analysis area, depending on the "route." Clarify this and verify	Revised

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				that the Affected Environment Section, Consequences sections, and Appendix B.3 are consistent.	
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-177	15	wetland vegetation type	Clarify; this conflicts with the primary vegetation community that is listed for this species in Table 3- 36. Be consistent with the vegetation communities for each special status and federally listed plant species.	The table referenced by the comment has been revised to no longer identify the vegetation community where a special status plant is likely to occur. The analysis of special status plant species has been updated in the Final EIS to discuss jurisdiction, conservation status, known occurrence location relative to project features, and the application of design features and selective mitigation measures to reduce effects.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-177	17	fugitive dust	Mention the EPMs that are set up to reduce fugitive dust and thus the potential indirect impacts to plants.	The table referenced by the comment has been revised to no longer identify the vegetation community where seaside heliotrope, or any other special status plant, is likely to occur and include accurate status information.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-178	2-12	Snake River Goldenweed	Consider including the total number of occurrences present in the entire range for the plant (Idaho and Oregon)? State the number of occurrences that would be impacted and the scale compared to all populations known across its range instead of just the analysis area. Clarify if impacts would be to all individuals in the population or only a few individuals from some of the populations? Reference design features that would reduce impacts.	This section has been updated in the Final EIS to discuss the number of known occurences in the 1-mile and 10-mile analysis corridors, as well as the application of design features and mitigation measuers to reduce effects on special status plants.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-178	8-9	an effect to populations that would result in species level impacts	Clarify what is meant by “an effect to populations that would result in species level impacts.”	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-179	2-3	Effects to these vegetation communities and three high priority plant species (Snake River goldenweed, Malheur prince’s plume, and Janish’s penstamon) are discussed in greater detail below.	The Affected Environment sections indicates that Cronquist’s stickseed, Malheur prince’s plume, and Snake River goldenweed are known to occur and doesn’t mention Janish’s penstemon. The consequences section doesn’t mention Cronquist’s stickseed but the Affected Environment section does. Be consistent. Penstemon is spelled incorrectly. There is a “e” not an “a.” Update.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-179	5	Effects to rare forest/woodland communities would be high.	Clarify why these communities are considered rare.	This section has been updated in the Final EIS.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-180	16-17	However, Janish’s penstemon is not a listed species in the state of Oregon and thus is not further analyzed in this segment.	Clarify why Janish’s penstemon is listed in Table 3-51, even though this statement indicates it isn’t analyzed in this segment. This sentence should clarify that Janish’s penstemon is not an Oregon BLM sensitive species either, only an Idaho BLM special status.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-180	24-25	Loss of habitat and potential the potential loss of 16 populations associated with the Proposed Action would be a long-term high effect to the species.	Clarify if impacts would be to all individuals in the population or only a few individuals from some of the populations? Reference design features that would reduce impacts. Clarify why these impacts are considered long-term and moderate but impacts to Snake River Goldenweed for Segment 3 would be long-term and high, even though the percent disturbed is similar. Clarify the impacts description and reference design features.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-180	25-28	“The effects to Snake River goldenweed from construction of the any of the alternatives would potentially result in the loss of sensitive plants that would not affect the overall population viability of the species. The effects from each of these alternatives would be long-term and moderate.”	These sentences seem to contradict each other. Revise to avoid the contradiction and clarify what is meant.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of design features and mitigation measues to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-182	6-7	“New infestations of morning glory in areas not previously documented would result in long-term and high impact to native vegetation communities.”	Provide a reference to substantiate this statement. Morning glory causes problems in agricultural equipment and it is a nuisance in turf.	This section has been revised.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-182	12-14	Effects to these vegetation communities and four high priority plant species (Mulford’s milkvetch, Cronquist’s stickseed, smooth mentzelia, and sterile milkvetch) are discussed in greater detail below.	Clarify this sentence; it appears something is missing from the beginning of this sentence. Which vegetation communities are referenced? This lists 4 priority plant species, but the Affected Environment for Segment 5 mentions 9 priority species. Clarify and be consistent across sections.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor. The analysis of special status plant species has been updated in the Final EIS to discuss jurisdiction, conservation status, known occurrence location relative to project features, and the application of design features and selective mitigation measures to reduce impacts. The analysis in the Final EIS no longer discusses the vegetation community likely to support a given special status species.

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3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-182	15	The effects to wetland, riparian, and surface water would be long-term and high.	Clarify; earlier, on page 3-164 lines 24-25, it indicates that impacts would range from low to moderate. These statements conflict with one another.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-183	9	would be moderate to high, and short- to long-term in duration	Clarify; earlier, on page 3-164 lines 24-25 it indicates that impacts would range from low to moderate. These statements conflict with one another.	This section has been updated in the Final EIS to consistently discuss the level of impacts. The criteria used to assess the level of impacts are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-183	11-12	would affect 1 to 2 acres of wetlands, riparian, and surface water more than the remaining alternatives.	Re-word this sentence for clarity.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-183	12-16	In general impacts to wetlands would likely be due to fill activities within the wetlands…	Clarify and be consistent; these last few sentences are not consistent with earlier wetlands, riparian and surface water impact descriptions. Reference Fish Resources in the impacts common to all section. Refer to design features that would reduce impacts to wetlands. Clarify why there is an assumption that wetlands would be filled in during construction.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-183	24	within the vicinity	Further define “within the vicinity.”	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-183	26-27	Cusick’s pincushion is known to occur in Segment 5. However, it is not a listed species in the state of Oregon and will not be analyzed further in this segment.	Clarify that Cusick’s pincushion is not an Oregon BLM sensitive species either, but it is an Idaho BLM special status species.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-184	4	fugitive dust	Refer to design features that would reduce fugitive dust impacts.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of design features and mitigation measures to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-184	19-27	Smooth Mentzelia section	The text does not match Table 3-52. It looks like Malheur S and A alternatives have been switched. Verify and ensure that the text and Table present consistent information.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-184	23	Smooth mentzelia occurs in a variety of habitats and populations are distributed well outside of the analysis areas for the project.	Smooth mentzelia has very specific habitat requirements. Clarify what is meant by a “variety of habitats.”	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-184	26-27	The effects to the species resulting from construction of the Malheur S Alternative would be long-term and moderate.	In the second sentence of the same paragraph it states “Malheur A Alternative would directly impact one population.” There is no discussion of impacts by the Malheur S Alternative, but the effects are rated “long term and moderate”—please clarify what this is based on.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-184	33	Effects to this species would be low.	Clarify the duration of impacts. Include “short-term” to be consistent with the rest of the impact analysis.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-184 and 3-185/Table 3- 52	6-18 and Table	Cronquist’s Stickseed section and Table 3-52	Consider including the total number of occurrences present in the entire range for the plant (Idaho and Oregon)? State the number of occurrences that would be impacted and the scale compared to all populations known across its range instead of just the analysis area. Clarify if impacts would be to all individuals in the population or only a few individuals from some of the populations? Reference design features that would reduce impacts. Clarify what is meant by a species level effect to this plant. Clarify and be consistent. Table 3-52 states that there are between 59 and 115 occurrences within the Analysis Area in Segment 5; however the plant description on page B.3-22 line 15 states that there are only 52 populations known within its entire range. Later in the description (line 21) it states that there are 7 known occurrences within the Proposed Action, but table 3-52 indicates that there are 13 disturbed populations for the Proposed Action. Fix the inconsistencies. Review and revise all of the special status species occurrence tables in this section. Verify that the impacts are consistently reported, including the intensity and length of impacts. Reference the design features that will	The analysis of special status plant species has been updated in the Final EIS to discuss jurisdiction, conservation status, known occurrence location relative to project features, and the application of design features and selective mitigation measures to reduce effects. The analysis in the Final EIS no longer discusses the vegetation community likely to support a given special status species.

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				be utilized to avoid and reduce impacts to special status plant species.	
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-185/Table 3-52	Whole Table	General comment for this table and general methodology for special status plants	Clarify if historic, extirpated, and high spatial uncertainty data sources were used in the analysis? Typically these poorly defined data sources are removed from this type of an analysis since they are not an accurate representation of current conditions.	This section has been updated in the Final EIS, and the methods and sources used for the analysis of special status plants discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-186	5-7	Halogeton is only documented in association with the analysis area within Segment 5. The spread of halogeton to other segments within the project area would result in new infestations in the project area.	Clarify that halogeton is not considered a noxious weed in Idaho, so it is likely not in the dataset. Halogeton is unfortunately quite common in some areas. Clarify that all areas have not been surveyed and existing data sources may not be all inclusive of all known locations of halogeton and other noxious weeds.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-186	11-12	Intensity of impacts to perennial vegetation and imperiled native communities would be long-term and high.	Clarify "imperiled native communities." Clarify the regulatory framework and management requirements for imperiled vegetation communities in the regulatory framework section to provide context for this reference and other references to imperiled vegetation communities.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-186	15-18	The analysis area of Segment 6 contains extensive shrubland communities that are slow to regenerate and provide high value special status species habitat. Effects to these vegetation types are discussed in greater detail below. There are no federally listed or special status species with known occurrences in the analysis area for this segment. There are no alternatives to the Proposed Action in Segment 6.	Verify and clarify the conflicting information in these 2 sentences. One sentence indicates there is high value special status species habitat, and the next sentence states there are no special status species known. Revise to make this consistent. Verify that there are no special status plants known from Segment 6. The Affected Environment section on page 3-159 lines 27-30 indicate that there are 3 priority BLM species, but no further discussion is included.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-187	5	moderate to high, and short- to long-term	Earlier, on page 3-164 lines 24-25 it indicates that impacts would range from low to moderate. These statements conflict with one another.	This section has been updated in the Final EIS to consistently discuss the level of effects. The criteria used to assess the level of effects are included in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-187	19	Russian olive has not been documented in Segments 1-5 Weedmapper (2012).	Clarify that Russian olive is not a noxious weed in Idaho, which is where Segment 6 is located. Russian olives are ubiquitous in Idaho and Oregon even if they are not mapped in Weedmapper (2012). Revise this sentence to include the correct reference.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-187	23	imperiled native communities	Clarify the "imperiled native vegetation communities." Clarify the regulatory framework and management requirements for imperiled vegetation communities in the regulatory framework section to provide context for this reference and other references to imperiled vegetation communities.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-187 to 3- 190		Design Features section	Integrate the discussion on design features and EPMs throughout the Environmental Consequences section, clarifying that design features and EPMs that would be incorporated into the project to reduce the impacts to vegetation resources. Reference TR-2 in Appendix C of the DEIS, designed to reduce fugitive dust and impacts from fugitive dust on vegetation resources.	This section has been revised in the Final EIS and the types of potential impacts on vegetation resources, as well as the application of design features and mitigation measures to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-189	37	Not all areas would be revegetated; in some areas revegetation would either be limited or prevented.	Clarify.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-191	1-2	would reduce overall habitat fragmentation associated with the project.	Clarify the description of habitat fragmentation; this is the only place in the vegetation section where habitat fragmentation is mentioned and it is unclear what is meant and how it is associated with the project.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-191	4-5	it is likely that effects to listed species will be consistent regardless of listing status.	Clarify "consistent regardless of listing status?"	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-191	5-7	Pre-construction surveys for ESA Candidate species would be conducted along the selected alternative for the transmission line and associated facilities (Design Feature PRC- 8). Appropriate action would be taken to avoid adverse impacts on ESA Candidate species and their habitats (e.g., marking avoidance locations on the ground) (Design Features OM-14, PRC-8). The placement of roads or towers may be altered, where practicable (Mitigation Measure PRC-8). Monitoring activities, implementation of Project speed	Clarify that all special status plants would be surveyed for and avoided, where practicable, during pre- construction surveys, as presented in PRC-8. This design feature should be discussed earlier and throughout the vegetation section because this would reduce impacts to special status plants that are previously discussed.	This section has been revised in the Final EIS and the types of potential effects on special status plant habitats, as well as the application of design features and mitigation measures to reduce effects is discussed in Section 3.2.3.4.

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			limits, and other restrictions may be implemented (Design Feature PRC-8). If federally listed or ESA Candidate species are discovered during work, Idaho Power would establish a spatial buffer zone and immediately contact the appropriate land-managing agency.		
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-192	25-31	Mitigation Planning	This section appears to be out of place. The Draft Framework for Development of Compensatory Mitigation Plans in Appendix D refers exclusively to wildlife and fish habitats and does not specifically call out vegetation communities. The plan does not discuss vegetation resources with a high residual impact, as indicated in this section. Clarify.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-192/Table 3-53		Imperiled forest/woodlands Imperiled grasslands	Clarify "imperiled native forest/woodlands" and "imperiled grasslands." Clarify the regulatory framework and management requirements for imperiled vegetation communities in the regulatory framework section to provide context for this reference and other references to imperiled vegetation communities.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-192/Table 3-53			Review this table, particularly the initial impacts column. Verify and ensure consistency with the text in the prior section. Clarify and remove the inconsistencies between Effect Common to All Alternatives, Effects by Segment, and this table.	This section has been revised in the Final EIS and the types of potential effects on vegetation resources, as well as the application of design features and mitigation measures to reduce effects is discussed in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-192/Table 3-53		Federally Listed Species and Priority Special Status Species	Add the design feature PRC-8 to each species.	This section has been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-192/Table 3-53		Janish's penstemon	Clarify why this species is included or remove it. This species is included in Tables 3-51 and 3-53, but the text indicates that the species is not further analyzed. Remove from Tables 3-51 and 3-53 and the "partial analysis", or include in the discussion in text.	The methods used to identify sensitive plant species for inclusion in the Final EIS were revised to identify species with known occurrences in the 10-mile analysis corridor and discuss in greater detail those occurring in the 1-mile analysis corridor. The methods are discussed in further detail in Section 3.2.3.4.
3.2.3.6 Vegetation Resources/Environmental Consequences	p. 3-192/Table 3-53		Agriculture	Since Agriculture discussed in Section 3.2.6 Land Use, as mentioned earlier on page 3-165 lines 7-9, please remove from this table or reference the section where it is discussed.	This section has been updated in the Final EIS, and the text revised to include references to the agriculture section where agriculture specific effects are discussed.
3.2.3.6 Vegetation Resources/Environmental Consequences	General Comment- Entire Section			Most of the Environmental Consequences Section (3.2.3.6) should be revised since it is difficult to understand sentence meaning and potential consequences. Re-write and clarify the items that contradict each other, sentences that jump back and forth between analysis area and disturbance area, run-on sentences that make it difficult to interpret meaning, and grammar issues. Also, it is difficult to determine what the "disturbance area" actually is—it is never clearly defined in the text. Clearly define and include it consistently throughout the analysis.	The sections referenced have been updated.
3.2.3.6 Vegetation Resources/Environmental Consequences	General comment for all Federally Listed and Candidate Species and Special Status Species			Consider adding the distance from the nearest known occurrence to the disturbance footprint for context. Clarify if there would be any indirect impacts if the known occurrence is far away?	The analysis of special status plant species has been updated in the Final EIS to discuss known occurrence location relative to project features, potential direct and indirect effects are discussed in Section 3.2.3.4.
Section 3.2.4 Wildlife Resources					
3.2.4 Wildlife Resources	Entire Section	n/a	Right-of-way, ROW	Use the ROW acronym throughout the section.	The term "right-of way" is consistent with style guide for the EIS approved by BLM. No changes made.
3.2.4 Wildlife Resources	Entire Section	n/a	Greater Sage-Grouse	Be consistent when using capitalization for species common names. Why is Greater Sage-Grouse fully capitalized while Columbia spotted frog and Washington ground squirrel only capitalize the proper nouns which refer to geographical place names (preferred approach)? Recommend using "greater sage- grouse."	The BLM has requested that Greater Sage-Grouse be capitalized for the EIS. No changes made.
3.2.4 Wildlife Resources	Entire Section	n/a	Scientific names in text	Use the scientific name in-text at the first usage of the common name and not again (unless required to describe taxonomic history). Does not apply to table usage.	Scientific names are provided in tables and are not repeated in the text.
3.2.4 Wildlife Resources	Entire Section	n/a	Document titles in text	Should the title of a document be italicized when presented in text?	The EIS has been revised for consistency throughout.

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				Check entire section to correct inconsistent application of italics.	
3.2.4 Wildlife Resources	Entire Section	n/a	Figures	Create figures showing the analysis area for big game and sage-grouse by Segment (can be multiple maps) with each species relevant habitat polygons so that the reader can get a better understanding of the analysis.	Maps have been revised based on map templates approved by the BLM.
3.2.4 Wildlife Resources	Entire Section	n/a	n/a	Many of the species accounts/descriptions are very nearly word-for-word with what was provided in the resource report (OR Wallowa-Whitman MIS); however, it does not appear that the report was cited within text. Provide the reference.	The text for Management Indicator Species (MIS) has been moved to the USFS MIS appendix.
3.2.4 Wildlife Resources	Entire Section	n/a	n/a	Review of special status species list will require some changes to the species accounts and descriptions of impact due to Proposed Action and all alternatives. It would also be pertinent to include a sentence or two that describes whether or not each segment will include all species, or only special status species from the respective states.	The text has been revised to include updated species lists and descriptions of the affected environment for each segment.
3.2.4 Wildlife Resources	Entire Section	n/a	Table 3-38	Table 3-38 is referenced in the wildlife section repeatedly. The percentages set forth in the table differ from those in the text. Review the percentages and use consistent data.	The tables have been revised.
3.2.4 Wildlife Resources	Entire Section	n/a	n/a	The Affected Environment section is significantly vague. It relies heavily on tables for species presence/probability of occurrence as well as habitat. This seems an acceptable description of species present; however, it could be improved by adding narrative descriptions and species.	The Affected Environment section has been revised.
3.2.4.1 Wildlife Resources/Introduction	p. 3-193	8-10	…Boarman to Hemingway (B2H) Project is not discussed here in the same depth as species upon which the decision making agencies place management emphasis. Species that warrant increased management attention that will be discussed in detail below include Endangered Species Act (ESA)…	Misspelled "Boardman." Is it necessary to re-define the B2H and ESA acronyms for this section? Be consistent with presentation of acronyms. Inconsistencies appear throughout Section 3.2.4.	The EIS has been revised for consistency throughout.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-193	34-36	The U.S. Fish and Wildlife Service (USFWS) has developed the *National Bald Eagle Management Guidelines*, which provide general recommendations for activities that occur near bald eagle roosts and nests.	Provide a citation/reference for the *National Bald Eagle Management Guidelines* document in this section.	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-196	1-6	In accordance with the National Forest Management Act each national forest and grassland is required to develop LRMPs and periodically revise them. The USFS has developed Land and Resource Management Plans (LRMPs) for national forests that specify regulations, goals and management objectives including temporal and spatial restrictions for activities within areas managed to protect certain species and land and aquatic values	Do not use "LRMP" acronym prior to it being defined.	The EIS has been revised for consistency throughout.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-196	17	…endangered, or priority species.	Define "priority species" as it is used here. The Oregon and Federal ESA, and BLM and USFS sensitive species lists do not define "priority" species.	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-198	10-15	Species can be Oregon state-listed as endangered or threatened, proposed as endangered or threatened, or a candidate for listing (Oregon Biodiversity Information Center [ORBIC] 2010). Oregon maintains a list of species protected under the Oregon ESA of 1987 (ORBIC 2010). ODFW also maintains a list of sensitive species, under which species can be designated as critical or vulnerable (ORBIC 2010). This list is used to determine species on which to focus management, research, and conservation activities.	This description would be more readable if the three references to ORBIC 2010 were eliminated and a clarifying sentence was added that said "Oregon threatened, endangered, and sensitive species lists are maintained through the Oregon Biodiversity Information Center (ORBIC) cooperative project and are available in *Rare, Threatened and Endangered Species of Oregon* (ORBIC 2010).	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-199	9	In September 2014, USFWS issued their Greater Sage-Grouse Range-Wide Mitigation Framework.	Provide a citation/reference for the document mentioned.	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory	p. 3-199	15-17	The recommendations provided in this framework are consistent with the information and conservation	Provide a full citation for the COT Report.	This section has been updated.

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Framework			objectives provided in the 2013 Conservation Objectives Team Report (COT Report) for Greater Sage-Grouse.		
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-200	1-24	n/a	Inclusion of detailed methodologies from ODFW's 2012 Mitigation Framework seems out of place in this section. Recommend moving this discussion to Section 3.2.4.6 Environment Consequences.	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-204	13-27	Entire paragraph	BLM should not use or rely on the findings or conclusions of the National Technical Team, including those set forth in the NTT Report, because the NTT was not established or conducted in compliance with the Federal Advisory Committee Act because, it was not properly established in the Federal Register, meeting notices were not set forth in the Federal Register, team membership was not balanced, and the state government representatives did not have proper authority under the act. *See* 5 U.S.C. App. 2.	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-204 through 3-205	p. 3-204, line 13 through p. 3-205 line 4	Entire paragraph	The USFWS Conservation Objectives Team Report is guidance only and does not create a legal obligation that the B2H Project must meet. *See* COT Report at ii. The following sentence should be added at the end of this paragraph: "The COT Report is guidance only and does not create a legal obligation that the B2H Project must meet. *See* COT Report at ii."	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-205	p. 5-13	Entire paragraph	This paragraph states that the USFWS "will use the COT Report to review B2H actions and determine whether these actions will contribute toward the need to list the species under the federal ESA" and identifies certain criteria deemed "important in the overall listing review." The issues before BLM is whether to grant the right-of-way and not whether to list the Greater sage-grouse under the Endangered Species Act. Thus, the document's discussion about the USFWS' process or considerations for the listing decision are irrelevant and speculative, particularly with respect to the COT Report which was released after the listing proposal. This paragraph should be deleted.	This section has been updated.
3.2.4.2 Wildlife Resources/Regulatory Framework	p. 3-209	6-8	In an effort to effectively organize the overall analysis, the entire analysis area was divided into six project segments. These segments are mentioned throughout the Affected Environment and analyzed in more detail for specific wildlife groups and species in the Environmental Consequences section.	Refer the reader to Section 3.1.1.2 Overview for a description of each segment.	This section has been updated.
Appendix E	p. 7		When distance bands for roads and transmission lines overlap, impacts will not be "double- counted." In other words, only new or expanded existing roads outside of the buffer used to calculate impacts from the transmission line (i.e. 0.6 mile) will be assessed for impacts.	Modify this text to reflect the most current guidance from ODFW. ODFW has informed Idaho Power that this statement is incorrect and that roads within the 0.6-mile buffer of the transmission line should be considered for inclusion in mitigation calculations as described in their 2012 Mitigation Framework.	This section has been updated.
3.2.4.4 Wildlife Resources/Methodology	p. 3-207	21	USFS Regional Forester's special-status-species list (January 31, 2008) BLM State Director's special-status-species list (February 7, 2008)	Explain why you are not using the more recent 2011 USFS and BLM special status species lists.	This section has been updated.
3.2.4.4 Wildlife Resources/Methodology	p. 3-208	5	Wildlife (Big Game) Management Units (MUs)	The acronym MU is not used in Chapter 3. Remove.	This section has been updated.
3.2.4.4 Wildlife Resources/Methodology	p. 3-208	20-24	Only existing data were used for special-status species analysis conducted for most species, as agreed to by the agencies as part of the phased study plan approach. However, Greater Sage-Grouse and Washington ground squirrel survey data collected for this project were included in the analysis because all areas of suitable habitat were surveyed, allowing for an even comparison throughout the analysis area for all alternatives where suitable habitat is present.	Greater sage-grouse surveys were not performed along the Timber Canyon alternative. PPH and PGH habitat occurs adjacent to Timber Canyon and was not covered in Project-specific surveys. Revise this statement and analysis, if necessary, based on the same.	This section has been updated.
3.2.4.4 Wildlife Resources/Methodology	p. 3-208	25	Analysis Area	Consider revising analysis areas for candidate species and big game. For example, the analysis area for sage-grouse might be the Baker Resource Area and the Vale District populations as described in the ODFW sage-grouse conservation document (Hagen 2011). The Affected Environment could discuss acres of PPH and PGH within those populations and then effects could be described relevant to those	The analysis area was reviewed and approved by the cooperating agencies.

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				populations, instead of an arbitrary 5 mile buffer. Same for big game, using a half mile buffer analysis area for big game impacts is not informative as to the effects on herds that use the area. Recommend using the watershed approach (as the USFS does in their HEI analysis) or ODFW Wildlife Management Units or some other population boundary that might be more relevant.	
3.2.4.4 Wildlife Resources/Methodology	p. 3-208	29-32	For some species, where species-specific surveys were conducted (i.e Washington ground squirrel), the analysis included a 'site boundary' which included a 500 foot-wide corridor including the transmission line, substation footprints, tensioning sites, multi-use areas and access roads.	Washington ground squirrel surveys were not limited to the EFSC site boundary. Recommend removal of the term "site boundary" as it is not referenced again in the wildlife analysis. Consider removing this text as it appears the intent is more clearly stated above in lines 20-24.	This section has been updated.
3.2.4.4 Wildlife Resources/Methodology	p. 3-209	2-5	Any species with known or suspected occurrences within the 10-mile-wide analysis area were considered to be present within the appropriate vegetation community subtype(s) that could potentially be affected by the Proposed Action and the alternatives.	Explain the meaning of "suspected occurrences." Does this insinuate an occurrence with low spp. confidence, or no occurrence data but suitable habitat requirements have been met?	This text has been deleted.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-209	25-26	Wildlife habitat types correspond to the primary vegetation community types discussed in 3.2.3 Vegetation Resources.	Redundant sentence. The same statement is made in lines 15-17.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	3-4	The USFWS provided a list of threatened, endangered, proposed, and sensitive species that have the potential to occur in the Project area for consideration in analysis (USFWS 2014a, b).	Provide the project specific list in an Appendix. "USFWS 2014a" does not exist in the references, or appendix. Correct citation errors here and throughout the document.	The citation has been added. The species list is included in the Decision File for the B2H Project.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	4-6	There is no designated or proposed critical habitat for threatened or endangered wildlife species in the Affected Environment.	Should "Affected Environment" read "analysis area?" Consistently use the term analysis area.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	7	Project area	"Project Area" should read "analysis area" Consistently use the term analysis area as it has a defined geographical extent.	The EIS has been revised for consistency throughout.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	7-8	Seven wildlife species with potential occurrence and/or suitable habitat within the Project area are discussed in Table 3-54.	Define the term "potential occurrence." What was considered to determine potential occurrence?	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	11	Greater Sage-Grouse (Columbia Basin DPS)	The Columbia Basin DPS of greater sage-grouse includes populations only found in Washington state, the nearest of which can be found on Yakama Indian Nation lands more than 30 miles away and across the Columbia River. Recommend removal of text "(Columbia Basin DPS)" here and throughout document if used.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	13-14	. . .the USFWS agreed to publish a final listing decision for all three candidate species by the end of fiscal year detailed information is provided for these species below.	Sentence is unclear on the date implicated. Consider identifying by date the "end of the fiscal year."	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	15-16	One species with interim status, with potential listing under review, black-backed woodpecker has suitable habitat in the analysis area.	The listing review for black-backed woodpecker is for two proposed distinct population segments identified in the petition, the Oregon Cascades-California population and the Black Hills population (South Dakota). Neither of these populations are near the B2H Project. Black-backed woodpeckers in the Blue Mountains and Wallowa Mountains are part of the larger more contiguous "boreal population" and are not under review. *See* 78 Fed. Reg. 21086 (Apr. 9, 2013).	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	16-17	The black-backed woodpecker is discussed in the Special Status Species section below.	Be consistent with capitalization of the term "special status species." Other than Table 3-57, the black-backed woodpecker is not mentioned again in Chapter 3. Recommend removal of this species from discussion under the Federally Proposed, Endangered, Threatened, and Candidate Species subheading.	Revised as suggested
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	15-34	Wolverine and gray wolves	Recommend removing discussion on wolverine and wolves from this section as they are no longer federally endangered, threatened, or candidate species. *See* 79 Fed. Reg. 47522 (Aug. 13, 2014) (withdrawing proposed listing of wolverine); 76 Fed. Reg. 25590 (May 5, 2011) (removing Idaho and Oregon gray wolves from ESA listing).	This section has been updated.

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3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	20-23	Although there is some peripheral / secondary habitat (dispersal) available in the analysis area for wolverine, there is no verified occurrence or source habitat. Individuals would likely only be found in the analysis area while dispersing between habitats. This species is, therefore, not discussed in more detail.	This statement is a bit misleading as the wolverine is included in the environmental consequences discussion for special status species. Similar language is used for Canada lynx which is not included in the environmental consequences discussion. Moving this text to the special status species section as suggested, and removing last sentence in this text block would avoid confusion.	Information about wolverine and Canada lynx has been updated for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-210	25-28	On October 3, 2014, the western distinct population segment of the yellow-billed cuckoo was formally listed as threatened. In accordance with the listing, critical habitat was designated. No critical habitat is designated in Oregon, and the nearest mapped critical habitat in Idaho is in the central portion of the state, well outside the boundaries of the analysis area.	Add language similar to lynx stating that the yellow-billed cuckoo would be unlikely to be found within the analysis area ("except for migrating individuals" or similar statement included) and is therefore not discussed further.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-211/Table 3-54		*Gulo luteus*	*G. g. luteus* is the California wolverine. Change to *G. g. luscus*.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-211/Table 3-54			Review species scientific names and listing status to ensure their accuracy.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-212/Table 3-55			The table is unclear. The title says habitat in the Analysis Area (by Segment), but the first heading is 'Proposed Alternatives by County'. Recommend changing the column heading to break out habitat by Segment or change the title of the table to more accurately reflect the contents. The alternatives listed under the first column heading 'by County' don't have a county descriptor. Are Malheur A and Malheur S in Malheur or Owyhee County? Segment 5 or Segment 6? Update table for clarification.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-212	7	Green *et al*. (1996, pp. 377–388; 1997, pp. 2–7)	Be consistent with citation format. Either include page numbers for all references or do not include them.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-212	13	West Coast distinct population segment. . .	Green et al. 1997 does not describe the west coast distinct population segment as being a part of *R. luteiventris,* he describes this population as *R. pretiosa* which is now listed as Threatened. Recommend removal from this bulleted list, as it contradicts with current taxonomy as described later on the page.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-212	17	All of the distinct population segments, except for the main population	Throughout the document, please consistently use either Main or Northern population to avoid confusion.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-212	18-20	In addition to its ESA candidate status, the only population within the analysis area, Great Basin distinct population segments, is also considered a BLM sensitive species in Idaho and Oregon and is considered vulnerable by the State of Oregon.	This sentence is confusing. The analysis area covers potential habitat for both the main population and the Great Basin DPS. Clarify the sentence.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-213/Figure 3-14	n/a	n/a	It would be helpful to include state borders and the Project route for reference.	Maps have been revised for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-213/Figure 3-14	n/a	n/a	Include the Project within the figure so that readers can get an idea of where the Project occurs in relation to known populations of Columbia spotted frog.	Maps have been revised for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-215	5	Existing habitat within the analysis area (1291 acres for all alternative) ….	Referring to the acres of habitat across all alternatives suggests that the entirety of the acreage may be impacted by the project. However, BLM's selected alternative would authorize the right-of-way along only certain routes and not all of the routes. For example, Table 3-55 provides the acres of habitat that would be impacted among the proposed action and three alternatives in Malheur County, while only one of those options would be chosen as part of BLM's final decision. To avoid the confusion, delete the reference to "1291 acres for all alternative" and instead rely on the information in Table 3-55.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-215	1		Typo on "wetland."	This section has been updated.

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3.2.4.5 Wildlife Resources/Affected Environment	p. 3-215	1-5	Open water calculated for the Draft EIS is overestimated. Wetland determinations, and associated categorization, created for the Draft EIS includes data that may not accurately depict actual features and acreages needed for the fine scale analysis for this species. The information provided may be revised, as needed, between release of the Draft EIS and Final EIS.	Acknowledging estimations and limitations of the data being used is sufficient. However, explain that the estimations were based upon the best available data.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-215	11		Discuss when the listing decision is expected and the current status of the sage-grouse EIS/RMP amendments currently under way within the analysis area.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-215/Table 3-55			The right third of the table has no units associated with it. Indicate units.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-216	2	Nesting usually occurs under sagebrush within 3 miles of a lek (ODFW 2011).	The cited material, ODFW 2011, indicates that nesting generally occurs within 4 and not 3 miles of a lek, stating: "On average, 80% of nests are within 6.2 km (4 mi) of the lek; however, some females may nest more than 20 km (12 mi) from the lek on which they were captured (Autenrieth 1981, Wakkinen et al. 1992, Fischer 1994, Doherty et al. 2011)."	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-216	2-5	Greater Sage-Grouse chicks are dependent on insect prey base after hatching (Johnson and Boyce 1990), but their diet shifts almost entirely to sagebrush as local vegetation desiccates in the late summer and fall (Schroeder et al. 1999).	Forbs and insects, and not just insects, are essential nutritional components for chicks. *See* 75 Fed. Reg. 13916.	Comment noted
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-216	29	Breeding and brood-rearing habitat…	Add nesting habitat to this sentence. Commenter understands that breeding habitat can be inclusive of nesting habitat, but sage-grouse seasonal habitats are often described as breeding, nesting, brood rearing, and wintering areas (Connelly *et al*. 2004).	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-216	29-31	Greater Sage-Grouse habitat use varies by season. Breeding and brood-rearing habitat (i.e., spring and 29 summer) is characterized by 10 to 25 percent sagebrush cover with an abundant grass and forb understory of greater than 15 percent cover.	Provide citation as these requirements vary across the range of sage-grouse.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-216	31-33	The grass component is important in secluding nest sites, and forbs are important as browse for Greater Sage-Grouse and for providing habitat for protein-rich insects, which are necessary for chick growth.	Consider splitting this sentence up as it describes grasses and nest sites, and forbs and chick growth.	Comment noted
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-218	10	Threats to Survival	Recommend citing the threats identified by the USFWS in their 12-month finding for listing factor A and listing factor D.	Comment noted
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-219	6-7	Wisdom et al. (2011) identified five key factors most likely to lead to extirpation of local populations: sagebrush area, elevation, distance to transmission lines, distance to cellular towers, and land ownership.	The DEIS language suggests that the Wisdom et al. (2011) found distance to transmission line to be a causative factor in extirpation. However, the text of the Wisdom document states that "distance to transmission lines and distance to cellular towers, have **unknown** relations with sage-grouse population dynamics at regional extents and mechanistic research is needed to understand the potential relation between these variables and sage-grouse extirpation." Johnson et al. (2011) evaluated sage-grouse lek trends and a variety of natural and anthropogenic features. They found no effect of transmission lines. Include a discussion of these qualifications. Modify the language to remove the statement "…identified five key factors most likely to lead to exptirpation…" as this language was never used in the Wisdom et al. (2011) paper. A more accurate statement of the findings presented in the paper would be "…presented five environmental variables that were the most significant of 22 variables in discriminating between former range and areas still occupied by sage-grouse."	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-219	17	Figure 3-15 displays the distribution of Greater Sage-Grouse habitat in the analysis area.	Figure 3-15 does not show the distribution of sage-grouse habitat within the analysis area. The analysis area is not depicted on the figure. Recommend changing sentence to read: "displays the distribution of	Maps have been revised for the Final EIS.

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				greater sage-grouse habitat in ~~the analysis area~~ eastern Oregon and western Idaho."	
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-220	15	The most densely occupied, and only, territories in Oregon occur on the Boardman Grasslands Important Bird Area on Naval Weapons Systems Training Facility Boardman-managed lands and the adjacent Boardman Conservation Area, managed by the Nature Conservancy (Audubon Society 2013).	Colonies have been identified in association with numerous development projects throughout the area and into Gilliam County. ORBIC data should reflect at least some of those colonies. Additionally, please standardize a term for the "Boardman Grasslands/ Boardman Conservation Area"and apply globally to the document.	The text has been revised.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-220	1-3	Delavan (2008) found that home range sizes varied from 435 m2 to 77,021 m2, with males having significantly larger home ranges than females, and home range sizes decreasing with increasing food availability.	Units of measure are wholly inconsistent throughout the vegetation section and wildlife section. Some areas are described in acres, others in square feet or square miles. Rectify and be consistent with units of measure. It is understandable to include the actual units portrayed in the document being cited for ease of confirming statements, but it would be preferable to present the value first in the standard units determined for this document and then in parenthesis the value with its cited unit of measure.	The EIS has been revised for consistency throughout.
3.2.4.5 Wildlife Resources/Affected Environment/Affected Environment	p. 3-223	5-7	Suitable habitat (including primary and secondary) within the analysis area consists of shrub-steppe and grassland habitat…	In evaluating each alternative in Segment 1, it would be useful to differentiate between the acreage of Washington Ground Squirrel Primary and Secondary Habitat within the ROW in Table 3-56 in order to evaluate potential difference among alternatives.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-224/Table 3-57	n/a	n/a	Review and update this table. Idaho BLM status and/or preferred scientific names of special status species may have changed (IM ID-2015-009).	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-230/ Table 3-58 p. 3-231/ Table 3-59 p. 3-235/ Table 3-60 p. 3-237/ Table 3-61	All Tables	n/a	Format these tables to be consistent with other tables regarding scientific names. i.e., use of italics and whether or not the scientific name is included every time the common name is used. Whatever approach is preferred, please be consistent in the application here and throughout the wildlife section.	The EIS has been revised for consistency throughout.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-231/Table 3-58	1-7	Table Notes: Throughout table, "—"indicates a segment in which the species is not on the BCC list for that region. * = Species with additional conservation rankings. [1] K = Known to occur (documented within the analysis area), L = Likely to occur (documented within project vicinity outside analysis area), M = May occur (not documented in project vicinity but suitable habitat is present in analysis area and the project is within the species' range), N = Does not occur. [2] Species is ESA delisted. [3] Non-breeding in this Bird Conservation Region. [4] Greater Sage- Grouse is addressed in greater detail in the Federally Listed and Candidate Species section of this DEIS. [5] Non-listed subspecies or population of threatened or endangered species. Riparian habitat for this species is limited throughout the Analysis Area.	Table notes, several references of "documented." Is this ORBIC occurrences, BLM data, or from some other data source? Provide a list of data sources used to determine documentation. "documented within project vicinity outside analysis area" is an undefined area. Define the parameters of the project vicinity. IF this is referencing occurrences outside of the 0.5, 1 or 5 mile analysis areas, it should be specifically defined as such and clearly state the significance of this determination. There appears to be a very fine line between "likely to occur" and "may occur" and the project vicinity definition would helpful in making sense of these two designations.	Data sources used for the analysis is provided under the "Data Sources" heading.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-232	13-14	There are two alternatives on the Wallowa-Whitman National Forest and five watersheds in the analysis area that may be affected. The Proposed Action is in the Beaver Creek-Grande Ronde and Five Points Grande Ronde watersheds, while the Timber Canyon Alternative is in the Big Creek, Eagle Creek, and Ruckles Creek-Powder River watersheds (Segments 2 and 3, respectively) (Appendix F).	Appendix F contains numerous tables, figures, and pages of in-text analysis. Provide exact location where the information being cited can be found in Appendix F.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-233 p. 3-239	5-8 15-17	The HEI evaluates size and spacing of cover and forage areas, density of open roads, quantity and quality of forage available to elk and cover quality. Forage data is unavailable and is not included in the total HEI value. The Wallowa-Whitman Nation Forest ran a HEI analysis for the watersheds affected on the USFS lands. In order to show maximum potential disturbance, HEI analysis considers access and	Forage data seems like a major component of the HEI model. Will this model produce accurate/reliable/telling results without the forage data? Is it weighted differently than the others? Provide more discussion on how the absence of forage data effects the model. Also, please provide reassurance that other planning decisions/analyses have been made using this model in the absence of one the variables.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.

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			construction roads as 'open' roads HEI estimates do not include forage assessments.		
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-235/Table 3-60 and 3-61			These tables are duplicates, but renamed, of those provided in Appendix F, The Wallowa-Whitman MIS analysis. Include citation being provided by the USFS or remove them from the body of the document and reference the reader to their location in Appendix F.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-239	8	… vegetation manipulation which…	There is no closed quote for this LRMP statement.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-239	14	…occur within one-half mile of the Proposed Action.	Change to read …occur within the analysis area.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-239	11-14	On winter range at least 80 percent of the treated area is within 600 feet of a satisfactory cover patch at least 40 acres in size. Within the Wallowa- Whitman NF, over 4.3 square miles of forest and woodland vegetation groups occur within one-half mile of the Proposed Action.	Be consistent in use of measurement units. In this case, both acres and square miles are used to describe an area. What is the significance of 4.3 square miles being within a half-mile of the Proposed Action in relation to the discussion of elk habitat that precedes this statement? Providing area calculations for proximate habitat with no explanation as to the significance in the context of the preceding discussion is confusing? Clarify the significance of the last sentence.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-239	16-17	In order to show maximum potential disturbance, HEI analysis considers access and construction roads as 'open' roads HEI estimates do not include forage assessments.	Missing period or other punctuation after 'open' roads.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-239	27	…with a total HEI value for the watersheds affected by the Proposed Action to be…	"Proposed Action" should read "Timber Canyon Alternative."	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-239	31	Common big game species that occur in the analysis area…	The analysis area for big game is not clearly defined. Are they included in the 0.5-mile "Wildlife Habitat" analysis area?	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-242/ Figure 3-18 p. 3-243/ Figure 3-19 p. 3-244/ Figure 3-20 p. 3-245/ Figure 3-21	n/a	n/a	Cite the source of the GIS data used for seasonal habitat either in the map legends or text. For example, ODFW has designated elk winter range but does not maintain a designated summer range dataset. Where did the summer range data come from, Rocky Mountain Elk Foundation?	Maps have been revised for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-240	4-5	In addition, both Oregon (ODFW) and Idaho (IDFG) manage for big game (elk and deer) by designated hunting / management units.	Why are these presented? They are not included in any part of the analysis on big game. Recommend removal of this dataset from the document unless pertinent information is included that ties into the analysis.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-240	6	Figure 3-17	Number Figures chronologically as they are referenced in text. Figure 3-17 is referenced in-text after Figures 3-18 through 3-21.	Maps have been revised for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-240	6	Existing Management Units, and their relation to the analysis area, is displayed in Figure 3-17.	Change "is" to "are."	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-240/ Table 3-62			Include elk summer range in the table or remove it from Figure 3-18.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-240/ Table 3-62	n/a	n/a	Recommend changing "Species" column heading to "Habitat Type" in order to more accurately reflect the contents in the table. "Occurrence Potential by Segment" column heading is also confusing. GIS data does not have the potential to occur, it either occurs within the segment or it does not. Recommend changing heading to "Occurrence by Segment."	Revised
3.2.4.5 Wildlife Resources/Affected Environment	Figures and Tables - General Comment in Affected Environment by Segment	n/a	n/a	Maps and tables are often not on the page following reference making reading confusing.	Maps have been moved to a separate map volume for the Final EIS.
3.2.4.5 Wildlife Resources/Affected	p. 3-246	8-9	Agriculture (approximately 51 to 56 percent of the analysis area, depending on alternative) and	Table 3-40 does not appear to be the correct table. Consider whether the authors intended to cite Table 3-38. Also, the percentages reported	The tables have been updated.

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Environment			shrublands (approximately 33 to 36 percent of the analysis area, depending on alternative) compromise the majority of primary wildlife habitats in segment 1 (Table 3-40,	are not consistent between the text and table. In the table, Agriculture in reported as 51 to 56 percent and Shrublands 28 to 31 percent. Correct so that the acres of impact presented in the Table match the acres of impact presented in text.	
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-246	8-10	Agriculture (approximately 52 to 56 percent of the analysis area, depending on alternative) and shrublands (approximately 33 to 36 percent of the analysis area, depending on alternative) comprise the majority of primary wildlife habitats in Segment 1 (Table 3-40, Section 3.2.3 Vegetation Resources).	Table 3-40 is the incorrect table for this reference, as it only contains the acreage of shrubland vegetation community and subtypes within the analysis areas of the proposed action and alternatives. It appears that the table provides % breakdowns in Table 3-38; which shrubland information is close but gives the wrong range of percentages. The shrubland range is actually 28-31% not 33-36%. Make a global check of the document to ensure that numbers presented in text match those presented in tables when the reader is referenced to the table. Also, please do a global check to make sure the correct tables are being referenced in-text, it appears that table numbering changed and was not reflected in the in-text references.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-246	11-13	Although agriculture occurs throughout Segment 1, these areas are especially concentrated in the western portion of the segment; natural vegetation communities (e.g., grasslands, shrublands) are more prevalent in the central and eastern portions of the segment (Figure 3-22).	What is meant by “natural” vegetation? Natural does not describe vegetation communities very well. Native, non-native, exotic, etc. could all be used to describe these vegetation communities in a more meaningful way. Or is it referring to everything but agriculture, bare/ground, developed, and open water? If so, please choose to use and define it as “all vegetation communities except…”	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-246	26-29	Suitable habitat for the Washington ground squirrel occurs on private and DOD lands within the analysis area for the Proposed Action, Longhorn Alternative, Longhorn Variation, and the Horn Butte Alternative (Table 3-56). Active Washington ground squirrel colonies were documented along the Proposed Action and alternatives during surveys conducted in 2011, 2012, and 2013.	Reference these surveys or the resource report that describes them. This is the first mention of these surveys (who, what, when, where, why?).	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-246	32-33	Information relating to the amount of habitat available for special status species within the analysis area is located in Table 3-38 in Vegetation Section 3.2.3	The “analysis areas” for special status wildlife and vegetation are different (5 mile and 0.5 mile buffers on either side of centerline, respectively). Clarify.	This section has been updated for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-247	8-19	Special status species such as common nighthawk, burrowing owl, Swainson’s hawk, bats (e.g., pallid bat), and white-tailed jackrabbits forage within shrubland habitat. These species are impacted by loss or modification of habitat for prey species. Two of these species, common nighthawk and Swainson’s hawk, are long distance migrants and would only be present in the project area during the breeding season. Burrowing owls are known to nest in shrub-steppe habitat in Morrow and Umatilla Counties and also migrate, although hatch-year males may sometimes over-winter. The most densely occupied breeding area for burrowing owls in the Pacific Northwest is located in Umatilla County, several miles north-east of the analysis area. Bird species such as the bobolink and long billed curlew typically use grasslands for both foraging and nesting habitat. The long billed curlew is a ground nesting species utilizing grasslands as cover for cryptic nests constructed in shallow scrapes in the soil. The common nighthawk typically uses grasslands as foraging habitats, preferring gravelly soils and riverbanks for nesting habitat. Conservation threats to these birds include	The descriptions of the species in this paragraph, and the remainder of the section require more documentation/reference. Even the resource report or natureserve should be cited. Review statements made in this paragraph and provide references where needed (i.e., “The most densely occupied breeding area for burrowing owls in the Pacific Northwest is…”)	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-247	23		The word “include” is repeated.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-247	26-28	Wildlife habitats in Segment 1 support many avian species identified as birds of conservation concern within BCRs 9 and 10 (Table 3-58). In addition, existing habitats provide nesting and foraging areas for a variety of raptors not listed as BOCC (Table 3-59).	BOCC is never defined as an acronym. Does it stand for Birds of Conservation Concern? Is this different than BCC- Birds of Conservation Concern that is first described on page 195? Define acronym or change it to match the correct acronym.	Text corrected

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3.2.4.5 Wildlife Resources/Affected Environment	p. 3-248/ Figure 3-22		Wildlife Habitat, Segment 1	This is the same figure as Figure 3-8 with a different title. Same information is displayed. Should be referenced instead of repeated, similar to how tables are referenced not inserted at multiple points in the document.	Maps have been moved to a separate map volume for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-249		Forests/woodlands (approximately 61 to 63 percent of the analysis area, depending on alternative) and 14 shrublands (approximately 26 to 28 percent of the analysis area, depending on alternative) comprise 15 the majority of primary wildlife habitats in Segment 1 (Table 3-38, Section 3.2.3 Vegetation Resources). 16 Minor concentrations of shrublands are present at either end of the segment and near the middle of 17 Segment 1, with forests /woodlands distributed throughout (Figure 3-22).	Clarify that this paragraph is describing habitat in Segment 2. It is under the Segment 2 header, yet references Segment 1 in-text.	Text corrected
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-249	1	Big Game sections throughout Affected Environment.	Present the acres of seasonal habitat for big game within the analysis area for Segment 1. Also include the current road acreages found within the analysis area and please detail the methods for calculating existing roads acreages.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-249	3	...elk (*Cervus elaphus*).	Scientific name for Rocky Mountain elk is *Cervus canadensis nelsoni*. Scientific names should be presented once in-text during the first time the common name is used in- text; please review document for inconsistencies.	*Cervus elaphus* is the scientific name used by Oregon Department of Fish and Wildlife (ODFW). No changes made.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-249	15	And shrublands (approximately 26 to 28 percent of the analysis area,...	Table 3-38 reports Shrublands are 25 to 27 percent of the analysis area. Correct so that the acres of impact presented in the Table match the acres of impact presented in text.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-249 p. 3-252	27-32 1-6	A small amount of Greater Sage-Grouse PGH occurs on state and private lands within the Segment 2 analysis areas (Figure 3-24; see Table 3-68). Greater Sage-Grouse lek surveys were conducted for Idaho Power during the breeding season in 2010, 2011, 2012, and 2013, and ODFW provided existing lek data for the analysis area. No leks have been identified within the analysis area in Segment 2. Suitable habitat for the Greater Sage-Grouse occurs on state and private lands within the analysis area for the Proposed Action in Segment 2 (Figure 3-24). Greater Sage-Grouse lek surveys were conducted for Idaho Power during the breeding season in 2010, 2011, 2012, and 2013, and ODFW provided existing lek data for the analysis area. No leks have been identified within the analysis area in Segment 2. The amount of habitat for Greater Sage-Grouse within the analysis area for the Proposed Action and the Glass Hill Alternative is presented in Table 3-68.	These are consecutive paragraphs in text that are essentially the same exact thing, just worded slightly different. Combine and edit to limit repetition.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-249	28-29	A small amount of Greater Sage-Grouse PGH occurs on state and private lands within the Segment 2 analysis areas (Figure 3-24; see Table 3- 68).	Provide the acreage of PGH habitat in the Segment 2 analysis area. Referring the reader to the Environmental Consequences section to understand the Affected Environment is not ideal.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-249	29-31	Greater Sage-Grouse lek surveys were conducted for Idaho Power during the breeding season in 2010, 2011, 2012, and 2013, and ODFW provided existing lek data for the analysis area.	Text is unclear. Surveys performed for Idaho Power within the Segment 2 analysis area only occurred in 1 of the 4 years that surveys have been performed. Review of the technical reports should clarify which year surveys were performed in this area. Similar statements are made for other Segments described in the Affected Environment.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-252	1-6	Suitable habitat for the Greater Sage-Grouse occurs on state and private lands within the analysis area for the Proposed Action in Segment 2 (Figure 3- 24). Greater Sage-Grouse lek surveys were conducted for Idaho Power during the breeding season in 2010, 2011, 2012, and 2013, and ODFW provided existing lek data for the analysis area. No leks have been identified within the analysis area in Segment 2. The	Language appears to be a duplicate of text on 3-249 lines 28-32. Recommend deleting.	This section has been updated.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
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			amount of habitat for Greater Sage-Grouse within the analysis area for the Proposed Action and the Glass Hill Alternative is presented in Table 3-68.		
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-252	27-35	Sensitive myotis species occurring within this segment are primarily forest dwelling bats. They utilize forest canopies as foraging habitat, sometimes foraging along forest edges over shrublands and grasslands. These areas include utility corridors, especially those located near water sources. While these species will utilize rock outcroppings and caves for roosting, hibernation, and maternity roosts, they are also known to use forest trees for daytime roosts outside of hibernation and breeding seasons. Fringed myotis specifically utilize old growth forest for roosting habitat in Oregon. Spotted bats have more specific habitat requirements, with a preference for forest stands adjacent to conspicuous rock outcroppings. Threats to these species include habitat conversion and loss of habitat due to logging practices	The term “sensitive myotis species” is misused. Refer to bats as “bats” not myotis, which is a genus/common name of some bats but not all encompassing. With the amount of sensitive bat species present between Oregon and Idaho it would be prudent to specify exactly which bats are being referenced. Prior to this selection in the same paragraph only long-legged myotis and Townsend’s big-eared bat are “known to be present in Segment 2.” No other species are specified. Then the Fringed myotis, spotted bat, and pallid bat appear in the discussion. Why? Are they known to occur? Is potential habitat present? The only two bats “known to be present in Segment 2” as described in the Affected Environment are long-legged myotis and Townsend’s big-eared bat. However, they are the only two bats that are not specifically addressed in any portion of this section. Why? Discussion should lean more on what occurs than potential to occur.	These sections have been updated for the Final EIS.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-253	21-22	The analysis areas of the Proposed Action and the Glass Hill Alternative intersect designated winter range for elk and mule deer (Table 3-69; Figure 3-18 and Figure 3-19; ODFW unpublished data).	Include acres of existing big game winter range within the Segment 2 analysis area. Referring the reader to the Environmental Consequences section to understand the Affected Environment is not a clear presentation of the data.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-253	21-22	The analysis areas of the Proposed Action and the Glass Hill Alternative intersect designated winter range for elk and mule deer (Table 3-69; Figure 3-18 and Figure 3-19; ODFW unpublished data).	Recommend using road density (miles per square mile) as the analysis indicator instead of acres of road. Much of the research detailing the effects of roads on elk look at road density (and traffic volume). The USFS HEI analysis uses road density.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-253	22	n/a	The Segment 2 analysis area also contains summer habitat for elk which was presented in Figure 3-18 at the introduction of the Affected Environment section. Include language that describes elk summer habitat as well as the acres of all seasonal big game habitat within the Segment 2 analysis area. Present this data for all Segments.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-253	29	Shrublands (approximately 55 to 90 percent of the analysis area, depending on alternative)	Table 3-38 reports Shrublands are 51 and 85 percent of the analysis area. Correct so that the acres of impact presented in the Table match the acres of impact presented in text.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-253	29-36	Shrublands (approximately 55 to 90 percent of the analysis area, depending on alternative) and forest/woodlands (approximately 1 to 34 percent of the analysis area, depending on alternative) comprise the majority of primary wildlife habitats in Segment 3 (Table 3-38, Section 3.2.3 Vegetation Resources). Shrubland habitat is the dominant type in the analysis area, with forest/woodland habitat concentrated in the northeast portion of Segment 3, along the Timber Canyon Alternative (Figure 3-25). A small amount of agriculture land occurs in Segment 3 with the majority concentrated in the northwest portion of Segment 3, within the analysis areas for the Proposed Action and the Flagstaff Alternative. Table B.4-2 (Appendix B.4) describes wildlife species commonly found in the primary wildlife habitats.	Consider summarizing primary wildlife habitats in Segment 3 for Timber Canyon separately from the other routes. Timber Canyon is more heavily forested while all the other routes traverse shrubland/grassland. As currently described it is unclear how the landscapes differ between the alternatives.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-255	9 and 13	Baker population vs Baker Resource Area	Are these two terms synonymous for describing the sage-grouse population in this area? If so, please only use one term. Also, appears that “Baker Population” is used later on this page. If this is the preferred term, please be consistent in the use of capitalization for the word population.	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-255	32-33	More than 80 percent of the historical sagebrush habitat for the Baker Population remains available today but steeper habitat and rugged topography	Provide citation that documents reduced suitability of habitat.	Revised

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			reduces the suitability for Greater Sage-Grouse.		
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-255 to 3- 256	36-37, 1	ODFW recent calculations of 2013 spring trend (moving 5-year average) count for the Baker Core population of the Sage-Grouse population estimates only 571 birds, which is 62.6 percent below the 2003 baseline of 2,017 birds.	The term "only" is suggestive and unnecessary, and therefore, it should be deleted. "ODFW recent calculations of 2013 spring trend (moving 5-year average) count for the Baker Core population of the Sage-Grouse population estimates ~~only~~ 571 birds, which is 62.6 percent below the 2003 baseline of 2,017 birds."	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-256	11-12	The most critical Greater Sage-Grouse habitat in the Baker Valley area occurs in the Magpie Peak area.	Provide a citation that supports this statement, or some other rationale describing sagebrush quality, lek density, radio collared bird use levels, etc.	Citation provided
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-256	15	(Hagen 2011b)	There is no Hagen 2011b in the reference section. Should it be Hagen 2011? Occurs more than once, please provide a global correction.	References have been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-256	17-18	The number of leks and the amount of habitat for Greater Sage-Grouse within the analysis area for the Proposed Action and all alternatives in Segment 3 are presented in Table 3-70.	Include acres of existing sage-grouse habitat within the Segment 3 analysis area. Referring the reader to the Environmental Consequences section to understand the Affected Environment is not a clear presentation of the data. Make this change for all Segments.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-257	20-22	The analysis areas of the Proposed Action and all alternatives intersect designated winter range for elk and mule deer and bighorn sheep habitat (Table 3-71; Figure 3-18, 21 Figure 3-19, Figure 3-20; ODFW unpublished data).	Provided detailed maps showing where the analysis area intersects with big game habitat.	Maps have been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-257	28-29	Shrublands (approximately 74 to 53 percent of the analysis area, depending on alternative) and grasslands approximately 3 to 17 percent of the analysis area, depending on alternative)	Table 3-38 reports 43 to 53 percent for shrublands and 34 to 40 percent for grasslands. Correct so that the acres of impact presented in the Table match the acres of impact presented in text. Consider being more specific and identify which alternative was highest and lowest for the various vegetation types.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-257	28-31	Shrublands (approximately 74 to 87 percent of the analysis area, depending on alternative) and grasslands (approximately 3 to 17 percent of the analysis area, depending on alternative) comprise the majority of primary wildlife habitats in Segment 4 (Table 3-38 in Section 3.2.3 Vegetation Resources). Shrubland habitat is evenly distributed throughout the analysis areas for the Proposed Action and all alternatives in Segment 4 (Figure 3-26). Highly limited grassland habitat is present, with small isolated sites scattered throughout Segment 4 (Figure 3-26)	The percentages for this segment are very different from the table that is referenced (3-38). Table 3-38 has shrublands in a range of 43-53% and grasslands from 34-40%. Correct to ensure that acreages stated in-text match those in the referenced table.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-257	32	Highly limitedgrassland…	Insert space between "limited" and "grassland."	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-259	10-11	The majority of suitable habitat appears to be located in the southern portion of Segment 4, near the junction of the Proposed Action and the Tub Mountain South Alternative (Figure 3-14).	Figure 3-14 does not display the juxtaposition of "…the junction of the Proposed Action and the Tub Mountain South Alternative…" Add the Project features to Figure 3-14.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-259	11-12	Estimates regarding the size and types of habitat available have not yet been determined.	Size and type of habitat is critical information when evaluating impacts on Columbia Spotted Frog. How can a long-term high impact on the species be described on page 3-303 when the Affected Environment hasn't been determined?	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-259	14-20	Segment 4 crosses through areas mapped for the Northern Great Basin population, a large Greater Sage-Grouse population found in Oregon, Idaho, Nevada, and Utah. The population is divided into two segments, with the largest portion in Oregon, Idaho, and Nevada and the smaller in northwestern Utah, known as the Box Elder area. This population occurs on a large amount of publicly managed land (largely BLM), and is among the least fragmented and largest sagebrush-dominated landscapes within the extant range of Greater Sage-Grouse (USFWS 2013).	This paragraph uses the term "large" five times to describe the size of the population, amount of habitat, or extent of the ownership of lands. The term "large" is ambiguous, unless defined. Consider defining the term, or not using it and instead using numbers.	Comment noted
3.2.4.5 Wildlife	p. 3-259	22-24	Between 1963 and 1974, 500,000 acres of sagebrush	Cite the source of this information and include in reference section.	Citation included

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Resources/Affected Environment			habitat was seeded to crested wheatgrass or sprayed with herbicide, and 1,600 water developments and 463 miles of pipeline were installed in the Vale District BLM's area for the Vale project.		
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-259	27	More than 58,000 acres is already dominated by invasive species (Hagen 2011b).	By stating that the land "is already" invaded, it implies that there is an expectation that more habitat will be invaded. Clarify if this is the case.	Text edited
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-259	22-24	Between 1963 and 1974, 500,000 acres of sagebrush habitat was seeded to crested wheatgrass or sprayed with herbicide, and 1,600 water developments and 463 miles of pipeline were installed in the Vale District BLM's area for the Vale project.	Could more background information be supplied regarding the Vale Project? Wording makes the first sentence confusing regarding "sagebrush habitat was seeded to…" Was sagebrush present, then seeded or was potential/historical sagebrush habitat seeded? Need to elaborate on existing condition (species initially present), species seeded, and any treatment (herbicide).	Sufficient information is provided to describe the current habitat conditions.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-259	35-38	The ODFW's Greater Sage-Grouse Conservation Assessment and Strategy has identified essential habitats which are referred to as "core habitat" and are equivalent to BLM PPH. These "core habitat" units represent key habitat areas as determined by breeding bird densities, winter habitat use, and connective habitat use.	The term "core habitat" is not used in ODFW's conservation strategy (Hagen 2011). Remove quotes and replace the term with "core area."	Revised
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-259 and 3-260	38 and 1-5	In Oregon, these units are called Oregon "Priority Areas for Conservation" or Oregon PACs and represent approximately 90 percent of the breeding population within 38 percent of the species range in Oregon. In most cases, Oregon PACs identify biologically meaningful units for management and monitoring that are different from USFWS PACs documented in the 2013 COT Report. In some cases, Oregon PACs combine smaller "core habitat" polygons into a single unit (ODFW unpublished data).	Focus the discussion of the Affected Environment for sage-grouse on PPH and PGH designations and proximity to leks, as these are the analysis indicators discussed and analyzed in the Environmental Consequences section. Inclusion of the Oregon PAC unpublished data makes it difficult to review and comment on the application of the data. In addition, its inclusion is not consistently applied to all Segments (absent from Segment 3, which commenter assumes contains a PAC). The unpublished Oregon PAC data is not included under the Methodology section (3.2.4.4) for Data Sources used for the analysis. Reconsider its application; either greatly expand it to all Segments or do not include it.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-260	n/a	PACs	The DEIS discusses PACs to provide a detailed description of sage-grouse habitat and populations in the vicinity of the Proposed Action. However, Figure 3-27 does not show the location of the Cow Valley Oregon PAC or other PACs and lek complexes described in the text. The figure shows PPH, PGH, and low density habitat, and without a depiction of the location of the PACs and lek complexes it is difficult to evaluate the extent of the Proposed Action on the named features. Consider adding a map or maps showing the relevant PACs.	PACs have been added to the Greater Sage-Grouse map.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-260	8	Based on Integrated Landscape Assessment Project (ILAP; Gaines et al. 2013) data…	Focus the discussion of the Affected Environment for sage-grouse on PPH and PGH designations and proximity to leks, as these are the analysis indicators discussed and analyzed in the Environmental Consequences section. The introduction of two new datasets on this page (ILAP, and Oregon PAC) is a confusing and unorganized approach to presenting the sage-grouse Affected Environment.	Comment noted
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-260	8-11	…98 percent (361,433 acres) of the 368,615 acre Cow Valley Oregon PAC is comprised of existing Greater Sage-Grouse habitat (300,608 acres; 83.2 percent) or areas with the potential to provide Greater Sage- Grouse habitat in the future (60,826 acres; 16.8 percent).	The analysis area for sage-grouse was not described as being the PAC, it was described as the area within 5 miles of the transmission line. Focus the discussion of the Affected Environment to PPH/PGH habitats and leks within the analysis area. However, using the PAC as the analysis area for sage-grouse would make more sense than the arbitrary 5 mile distance currently used.	The analysis for Greater Sage-Grouse was revised.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-262	22-23	Habitat for forest/woodland and shrubland species is available in varying amounts throughout the analysis area in Segment 4.	This is an example of vagueness that detracts from the readability of the document and provides little value in evaluating impacts of the various alternatives. Clarify the statement "…in varying amounts throughout the analysis area…"	This section has been updated.
3.2.4.5 Wildlife Resources/Affected	p. 3-263	2-4	Shrublands (approximately 92 to 95 percent of the analysis area, depending on alternative) followed by	Very far off from Table 3-38. Shrublands range 48%-55% and grasslands are 25-31%. Correct to ensure that acreages stated in-text	This section has been updated.

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Environment			grasslands (approximately 2 to 5percent of the analysis area, depending on alternative) comprise the majority of primary wildlife habitats in Segment 5 (Table 3-38 in Section 3.2.3 Vegetation Resources).	match those in the referenced table. If some other calculation was performed on the data presented in Table 3-38, the methods need to be clearly defined and BLM should reconsider including the reference to a table that provides conflicting information.	
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-263	16	The amount of wetland habitat (230 acres) that is present within the analysis areas for the Proposed Action and the alternatives in Segment 5 is described in Table 3-55.	Table 3-55 indicates there is 306 acres within the analysis area for the proposed alternative in Segment 5. Correct so that the acres of impact presented in the Table match the acres of impact presented in text.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-266	2	Shrublands (approximately 94 percent of the analysis area) comprise the majority of primary wildlife habitats in Segment 6 (Table 3-38)	Table 3-38 reports 55% for shrublands in the analysis area and 38% for grasslands. Figure 3-29 shows mostly shrublands and agriculture as the dominant vegetation communities rather than Shrubland and Grassland. This segment needs to be re-evaluated to determine the correct community types. Correct so that the acres of impact presented in the Table match the acres of impact presented in text.	This section has been updated.
3.2.4.5 Wildlife Resources/Affected Environment	p. 3-266	13	The amount of verified wetland/habitat (61 acres) that is present within the analysis area for the Proposed Action in Segment 6 is provided in Table 3-55.	Table 3-55 indicates there is 71 acres of Columbia Spotted Frog habitat within the analysis area in segment 6. Page 3-215 line 5 defines existing habitat as the 'Acres of Wetlands, Riparian, Open Water' column in Table 3-55. The table indicates there is 61 acres of Forested Wetland Habitat. Clarify the significance of presenting the breakdown between wetland types and riparian/open water types and why the acres of wetland types are being presented here instead of all "existing habitat" as defined.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	General comment to the section			It seems as though these sections could use some reorganization. The discussion in later segments for habitat, special status species, and migratory birds becomes very redundant leading me to think that a more valuable analysis may come from focusing on each habitat type and just saying in which segment they occur. Where effects are more fully analyzed (e.g., Segment 1) arguments need to be more clearly laid out to step the reader through potential impacts on the species and how the author reaches conclusions on scale of effects. Additionally, the naming of species within the Segment section is not very valuable as the individual species are not discussed. I think the section could benefit from beefing up the upfront description of effects "common to all wildlife species" and potentially including description of effects to each taxa. From this analysis, I don't walk away with a clear understanding of potential impacts to, for example, amphibians and invertebrates.	The sections referenced have been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-266	24-25	Despite efforts to manage wildfire risks, wildfires and invasive species have continued to reduce the quality of habitat in portions of this area.	Clarify what is meant by "this area."	Revised
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-270	19	Methodology	The methods presented here are very general. Include species specific methods here.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-270	25	3. Assessing initial impacts on wildlife resources present in the ROW corridors, …	It is unclear what is being presented in the analysis for acres of direct impacts. Is it truly all the habitat within the ROW, or just that habitat proposed to be disturbed (construction footprint)? In-text says "habitat that would be disturbed within the right-of-way" while the tables often show "within ROW acres." Clearly define up front.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-271	2-3	Effects determinations for ESA candidate species follow standard USFWS impact analysis categories and are described for the appropriate tables.	Effects determinations are not made for sage-grouse. Are these effect determinations appropriate for a DEIS? Since a BA/BE has not been completed for the Project, recommend refraining from using these terms in the DEIS until those documents have been finalized. Recommend removal of these determinations for Washington ground squirrel, Columbia spotted frog, and greater sage-grouse throughout the document.	This section has been removed.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-272	8	Federally Proposed, Endangered, Threatened, and Candidate Species	This heading does not match the text. There are two paragraphs addressing ESA but then it goes into a description of effects that are not specific to the ESA species discussed, and it is referred to	This section has been updated.

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				throughout the following sections for all wildlife species. Maybe add another heading to make clear general wildlife effects are being addressed.	
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-272	10	habitat removal and disturbance from line construction (long term)	Disturbance from line construction doesn't seem to be long-term. Is this text indicating long-term disturbance from the presence of the line? Revise for clarity.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-272	14-16	The three candidate species identified for further analysis, Columbia spotted frog (Great Basin distinct population segment - DPS), Greater Sage- Grouse (Columbia Basin DPS), and Washington ground squirrel are discussed in more detail in this section and in the appropriate project segment discussions.	The three candidate species are not discussed in more detail in this section. Recommend the following change: "are discussed in more detail ~~in this section and~~ in the appropriate project segment discussions."	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-272	17-35	Habitat removal	This section needs to be organized for clarity and fleshed out to describe how habitat removal effects species, not just how it would be happening.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-272	28	…both vertically (obstruction of flight paths) and horizontally	Explain how clearing of vegetation would obstruct flight paths.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-272 and 3-273		Discussion of effects	These effects could benefit from identification as direct or indirect, and further identification as long-term or short-term as they are referred to heavily throughout the following sections.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-273	8-9	Project-related habitat fragmentation would also result in loss of connectivity between primary breeding, foraging and dispersal habitats for some local species (i.e., big game winter and summer range, pileated woodpecker old growth connectivity).	Cite references that indicate transmission lines similar to the structures proposed here would result in loss of connectivity for big game or pileated woodpecker. Big game are frequently observed in close proximity to transmission lines and cross under the lines. Pileated woodpeckers use wood transmission poles for nesting in the ROW on the Idaho Power system. It is not clear why a transmission line would limit connectivity.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-273	Habitat Fragmentation	Discussion of forests	Should be resolved by changing main header, but no need for description of forest impacts if talking about Columbia spotted frog, greater sage-grouse, and Washington ground squirrel.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-274	Noise		It would be useful to add further discussion about how noise levels and duration expected from Project activities.	Comment noted
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-274	Fire Hazard and Fugitive Dust		May be helpful to add information about BMPs that would be implemented to minimize these risks/impacts.	Design features and selective mitigation measures that would be used to miminize effects on wildlife species are described in Section 3.2.4.4.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-274			Could be valuable to add a section on weeds and potentially herbicides.	Weeds and herbicides are discussed in the vegetation resources section.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-274		The effects analysis for MIS is described in Table 3-64 and Table 3-65, for wildlife habitat on FS lands located in Segments 2 and 3 (Proposed Action and Timber Canyon Alternative). Additional information relating to potential effects to MIS resulting from the Proposed Action and Timber Canyon Alternative are discussed in Cumulative effects to wildlife species (Section 3.3).	Move the description of the Environmental Consequences for MIS to the appropriate Segment headers. Presenting this information under Impacts Common to All does not follow the format presented for all other wildlife and detracts from the readability of the document.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-275	2-3	Removing canopy cover and large trees where suitable source habitat is present would affect nesting habitat availability and nesting success.	Explain how canopy cover removal affects nesting success. Otherwise, revise to: "Removing canopy cover and large trees where suitable source habitat is present would ~~affect~~ decrease nesting habitat availability ~~and nesting success~~."	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-276	8	Rocky Mountain Elk	Expand on the discussion of how roads effect elk. Extensive study has been performed by the Starkey Project and others on this topic.	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-276	25-27	…total HEI value of 0.60 (optimal HEI value is 1.0). With this alternative, the comparison of HEI values suggests that an increase in road density would lower the road density HEI value as well as the total HEI value.	The post-construction total HEI value is 0.60, the current HEI value as stated on page 3-239 of the Affected Environment is also 0.60. How does this represent a lower total HEI value?	The text for MIS has been moved to Appendix F – USFS Management Indicator Species.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-280	Entire Section	n/a	Clearly define table column headers. For example, Table 3-67. What is Analysis Area acres? Is this the total amount of space within the Analysis Area or is it the amount of mule deer winter range within the	The tables have been revised.

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				Analysis Area?	
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-280	5-7	The amount of each primary wildlife habitat type that would be disturbed within the right-of-way in Segment 1 is compared by alternative in Table 3-43 in Vegetation Section 3.2.3.	As with the vegetation section. This is the inappropriate/inaccurate use of habitat found within the ROW. Habitat within the ROW and disturbed habitat are being used interchangeably. This use is inaccurate and misleading. This table only describes the habitat present within the ROW and not the expected disturbance due to construction and operation and maintenance activities. Expected impact was provided within the ROW in the vegetation Resource Report. Clearly and consistently use either "habitat within the ROW" or "disturbed habitat" to inform the impact analysis. Jumping between the two is confusing.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-281/Table 3-66		Table-Incorrect data	The origin of the data provided in this table is unclear and confusing. Add supporting text to describe the analysis being performed. Reference back to text or other tables where sufficient information can be gathered by the reader to duplicate this analysis.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-281/Table 3-66	n/a	n/a	Is Suitable Habitat within ROW actually colonies documented during surveys? It is not defined how suitable habitat is identified. Additionally, this table is more or less a repeat (minus effects determination) of table in affected environment. Perhaps delete the first one.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-281/Table 3-66	n/a	n/a	Suitable habitat within ROW acres is a misleading metric for impact analysis. This is not clearly defined as to what is actually being calculated, but it is apparent that this number is not calculated from the actual construction footprint (disturbed ground). Presentation of the data in this manner makes the assumption that all habitat within the ROW is essentially not usable for Washington ground squirrels (page 3-281 line 13 says "The amount of available Washington ground squirrel habitat that would be impacted within the ROW"). There is no evidence presented in this DEIS, nor is there any such study/research or even anecdotal evidence that Washington ground squirrels won't use habitat underneath or adjacent to transmission lines. From *Washington Connected Landscapes Project: Analysis of the Columbia Plateau Ecoregion (*Washington Wildlife Habitat Connectivity Working Group, 2012, Washington's Department of Fish and Wildlife, and Department of Transportation, Olympia, WA. page A.6-5): "No research has been done on sensitivity of Washington ground squirrels to transmission lines. In some cases, power transmission corridors may retain suitable habitat for squirrels. However, it is postulated that power transmission towers and lines could have an impact on the squirrels by providing predator perches (R. Finger and M. Livingston, personal communication)." The effects determination of 'WIFV' for the Horn Butte Alternative is based on potential mortality of individuals (even though Idaho Power has sited around colonies and will perform pre-construction surveys) and permanent loss of habitat. The amount of acres of habitat permanently lost is not presented. The amount of habitat within the ROW is presented as impacted habitat and is misleading. The amount of suitable habitat within the ROW is less than 2% of what is available in the analysis area; the amount of suitable habitat proposed for disturbance would be less than 1% of the available habitat within the analysis area. Potential mortality from construction/operation activities or increased raptor perch opportunities and disturbance to less than 1% of suitable habitat would not warrant a 'WIFV' effects determination. Effects determination language is not appropriate for inclusion in the DEIS given a BA/BE has not been prepared.	The tables have been revised. Effects determination language has been removed.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-280 to 3- 283			A number of typos, please edit.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental	p. 3-282	18-20	Because the Bombing Range provides additional primary habitat, and existing populations are	Explain how these populations are protected from mammalian predation. Otherwise, remove statements regarding the same.	This section has been updated.

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Consequences			relatively protected from impacts such as hunting pressure and mammalian predation; direct, indirect and cumulative impacts related to installation of additional infrastructure would be expected to be moderate to high along this route.		
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-282	21-28	Due to its proposed location and the amount of suitable habitat available within the area (110,936 acres), the Hornbutte Alternative would be expected to have the highest impacts to Washington ground squirrel. The Longhorn Alternative is located east and north of the other alternatives, and, although mapped as having a higher shrubland vegetative component within mapped Washington ground squirrel suitable habitat (Figure 3-16), Google Earth (2013) mapping shows agricultural use within the immediate area. While the highest percentage of suitable habitat (34.9) impacted by the right-of-way is estimated for this alternative, habitat may be less suitable then projected.	The previous use of different analysis areas has already been mentioned; however, this paragraph has more analysis than others. The inability to distinguish between analysis areas in reference is very frustrating as a reader. Not sure where acreage is coming from. If there are 100,936 acres of suitable habitat in the Horn Butte Alternative, then what is the total acreage of the analysis area? Numbers provided in table 3-66 on page 3-281 show 100,936 acres as the total amount of acres within the analysis area. This appears to be the first time Google Earth mapping is cited. Is this used for general reference or is this used to actually delineate primary vegetation groups? Additionally, whatever the capacity this was used in analysis/text it should also be included in the methodology on page 3-207.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-282	30-38		It is unclear how the conclusion of WIFV for Horn Butte Alternative was reached. Along with the MIIH effects calls, these arguments should be clearly and logically laid out.	This section has been updated. The effects determination language has been removed.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-282	35-38	The effects determination for the Horn Butte Alternative is 'WIFV' - *Will Impact Individuals or Habitat with a Consequence that the Action May contribute to a Trend Towards Federal Listing or Cause a Loss of Viability to the Population or Species*.	Aside from disagreeing with the usage of effects determination language for sensitive species in a DEIS prior to a BA/BE being developed, a determination of 'WIFV' is premature given the lack of evidence presented in this DEIS.	This section has been updated. The effects determination language has been removed.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-283	4-21		This reads awkwardly in that common nighthawk is discussed in some depth but the other species are not.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-283	13-15	Indirect effects to the shrubland species, such as the common nighthawk, may include the introduction and spread of noxious weeds associated with newly constructed access roads, increasing the potential for human caused fire.	Potential for human-caused fire and spread of noxious weeds should be introduced in earlier description of effects.	This information is in the Types of Potential Effects section presented in Section 3.2.4.4.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-283	31-32	Indirect effects on special status grassland species include the effects common to all wildlife described above.	It is unclear to which section the reader is being referred.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-283	18 and 37	Because indirect effects would last longer than 3 years . . .	This statement has not been supported in earlier sections. Somewhere there needs to be further identification and description of effects. This statement is repeated many times throughout the analysis.	The methods section has been updated to provide a more clear description of the effect analysis.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-284	14	(without population-level effects)	This argument needs further support. This is a global comment as this is repeated many times throughout the analysis.	The methods section has been updated to provide a more clear description of the effect analysis.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-285	5-7	Common raptor species that occur in these major habitat types and affected habitat from the Proposed Action and alternatives are described below.	There is no further description of raptor species.	This section has been updated for the Final EIS.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-285	8-9	Direct impacts on raptors during construction could include collision with Project structures, electrocution, disturbance due to construction noise, fugitive dust, and visual disturbance.	Would collision and electrocution really be a risk during construction? Additionally, if the Project is built to APLIC standards, wouldn't electrocution risk be eliminated?	Additional information was added regarding electrocution risk for raptors.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-285	19	The impacts to habitat and small mammals described above	There has been no description of impacts to small mammals.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-286	2	indirect effects could cause mortality of migratory birds (with no population-level effect),	How would indirect effects cause mortality (this is global as it is repeated a number of times throughout analysis)? Again, need to support "no population-level" effect.	Revised
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-286	29-32	Response to disturbed right-of-way sites differs between big game species. Activity of big game species in the right-of-way can be a function of	The DEIS discussion indicates that the ROW would have a negative effect on big game, but the literature does not indicate that this is the case. Sopuk and Vernam (1985) concluded that the distribution and	Additional information was added regarding potential effects on big game.

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			species response to disturbance (Sopuk and Vernam 1985) as well as right-of-way characteristics such as width (Willyard et al. 2004).	local movements of resident moose were not affected by an Alaska pipeline. Large ungulates can be attracted to right-of-ways because increased forage potential and may use ROW corridors as travel corridors (Willyard et al. 2004). Expand the discussion in this paragraph to show the variability in responses by big game to ROWs and the uncertainty in predicting the response of big game to ROWs.	
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-287/ Table 3-67			Why are road acres of disturbance broken out? There is no discussion in-text regarding the effects of roads on big game. Recommend either lumping all project disturbance acres into one value or expanding the in-text discussion to provide the reader context for what is being presented. What is the significance of 26 acres of new roads? It might also be informative to note the assumption of road width used to come up with acres of roads, i.e. how many acres of habitat is disturbed for 1 mile of road? A discussion on the difference between existing roads and new roads is also warranted. Acres of existing roads are already a disturbance on the landscape (don't really provide cover/forage habitat) and therefore the presentation of 1 acre of existing road is not equal in effect to 1 acre of new road. Improvement of existing road may increase traffic and potential collision and avoidance of roads by big game while new roads would also remove cover/forage habitat and increase the overall road density on the landscape.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-287/ Table 3-67		Table-Incomplete	Only the Proposed Action rows of this table were filled out. Missing three rows out of four. Where is the rest of the information? If not applicable (no winter range, or all winter range is within features shared by all alternatives and therefore they are all the same), please provide a footnote to clarify.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-289	2-6	The distances to evaluate for indirect effects from access roads (i.e., 0.2 mile) and the transmission line (i.e., 0.6 mile) were chosen in coordination with ODFW, and according to the guidelines established in ODFW's Mitigation Framework. A description of the general types of direct and indirect effects to Greater Sage-Grouse is provided in the Segment 3.	Provide citations for the 0.2 and 0.6 mile impact buffers. If BLM relied on ODFW discussions or ODFW's mitigation framework, provide a justification for relying on the same.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-289	7-9	Permanent loss of Greater Sage-Grouse PGH in Segment 2, and the potential for mortality of individuals from indirect effects from the Proposed Action and alternative would result in long-term high impacts.	The document does not explain the nature of the "permanent loss" or how it would result in long term or high impacts. Similarly, there is no explanation of how the "potential" mortality from indirect effects would result in long-term or high impacts. Query how BLM can conclude that indirect impacts will be high even though the same impacts are unclear?	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-290/ Table 3-68		Footnote [1]	Including "associated support facilities" in the 0.6-mile buffer does not follow the 2012 ODFW Mitigation Framework for Sage-Grouse Habitats. The recommended application of the 0.6-mile buffer for transmission lines states "…a disturbance band of 0.6 miles on either side of the line…" and does not include supporting facilities. In addition, "associated support facilities" is not defined and makes the analysis hard to replicate. What exactly was buffered? Recommend clarification of methods and to apply the methods as described in the 2012 Framework. If BLM is going to apply the methods differently than suggested, please provide rationale and disclose how the methods differ.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-293	1	Big Game Sections	What is the significance of the % of habitat disturbed within the analysis area? What is the significance of new road creation? The analysis area is rather critical when discussing road density/increase in road acreages. Given that most project roads occur within 0.5 mile of the transmission line, the comparison between the Affected Environment and impacts from the Project would show a high increase in road density/acreages. The effect of Project roads would diminish as the analysis area increases in size.	This section has been updated.

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				Consider re-evaluation of the analysis area for big game and other species to reflect a more biologically relevant analysis. Habitat within population boundaries (if known/estimated), game management units, or watershed/sub-basin might make more sense.	
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-294/ Table 3-69		Table-Inconsistent (possibly incorrect use of disturbance gain).	Why would the analysis area acreage be different for analysis of the same route? Explain whether it is big game (mule deer and elk) habitat within the analysis area that is presented and not the total acres of the analysis area. Adding "within" to this column (like they did with the next adjacent column) would reduce misinterpretations.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-295	16	Greater Sage-Grouse	In determining the impacts, if any, of the Project on Greater sage-grouse, consider the following reference materials: LeBeau, C.W., J.L. Beck, G.D. Johnson, and M.J. Holloran. 2014. Short-term impacts of wind energy development on greater sage-grouse fitness. Journal of Wildlife Managment 78:522-530 (suggesting that transmission lines were not actively avoided by female sage-grouse during the nesting and brood- rearing period in the study area). Blomberg, E. and J. Sedinger. 2008. Dynamics of Greater Sage-Grouse (Centrocercus urophasianus) Populations in Response to Transmission Lines in Central Nevada. Progress Report: Year 6. Department of Natural Resources and Environmental Sciences, University of Nevada – Reno. Blomberg, E.J., M.T. Atamian, and J.S. Sedinger. 2007. Greater Sage-Grouse (Centrocercus urophasianus) Nest Success Following Transmission Line Construction in Northern Nevada [Abstract]. In: Proceedings of the 26th Western Agencies Sage and Columbian Sharp-tailed Grouse Workshop, Mammoth Lakes, California, June 23-26 (suggesting that presence of a 345-kV transmission line in Nevada did not affect sage-grouse nest success among 13 leks located approximately 0.5 to 15 km from the line). Wisinski, C.L. 2007. Survival and Summer Habitat Selection of Male Greater Sage-Grouse (Centrocercus urophasianus) in Southwestern Montana. M.S. Thesis. Montana State University, Bozeman (distance to power line variable was not found to be associated with sage-grouse habitat selection, suggesting that presence of transmission lines did not affect habitat selection by the male sage-grouse monitored during this study). Johnson, D.H., M.J. Holloran, J.W. Connelly, S.E. Hanser, C.L. Amundson, and S.T. Knick. 2011. Influences of environmental and anthropogenic features on Greater Sage-Grouse populations, 1997-2007. Pp. 407-450 in S.T. Knick and J.W. Connelly (editors). Greater sage-grouse: Ecology and conservation of a landscape species and its habitats. Studies in Avian Biology (vol. 38). University of California Press, Berkeley, CA (presence of power lines within 5 km and 18 km did not affect trends in lek counts).	The types of potential effects on Greater Sage-Grouse have been revised to include additional literature citations.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-296	12	…project area.	Change to "analysis area."	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-296	13-26	Entire Paragraph	Suggest removing references to prairie-chickens. Based on a review of studies, Walters et al. (2014) found that the effect of the 'tallness' of a structure could not be isolated from other aspects of development. Walters et al. (2014) determined that data do not exist to either support or reject the two common avoidance hypothesis: increased perceived predation risk or neophobia. Further, recent studies by Dr. Brett Sandercock have demonstrated that tall structures (wind turbines) may not have a pronounced effect on prairie-chickens. Thus, suggest acknowledging that avoidance could be an issue, but that data is limited and that response of sage-grouse to tall structures has not been experimentally studied.	References to prairie chickens have been removed.
3.2.4.6 Wildlife	p. 3-296	17-21	Published studies on species with similar life history	Pruett et al. (2009) documented prairie chickens crossing powerlines,	References to prairie chickens have been removed.

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Resources/Environmental Consequences			to the Greater Sage-Grouse, including the lesser (*Tympanuchus pallidincinctus*) and greater (*Tympanuchus cupido*) prairie chickens, indicated avoidance of areas where tall structures exist within prairie chicken habitat. These studies concluded that new transmission lines could lead to avoidance of previously suitable habitat and serve as barriers to movement in prairie chickens (Pruett et al. 2009).	finding that 17 lesser prairie chickens with locations within 2 km of the power line crossed the line one to four times. They also found that 8 greater prairie chickens with locations within 2 km of the power line crossed the line two to five times. Analysis of the data showed that prairie chickens crossed the power line less often than expected compared to if birds moved randomly. However, it is questionable whether the comparison should have been too random since prairie chickens move between leks and suitable habitat. No attempt was made in the study to relate movements to other habitat features present in the landscape including agricultural fields, oil/gas wells and houses. Pruett et al. (2009) concluded that prairie chicken avoided the power line by at least 100 m and documented 4 prairie chickens using habitat within 100 m of the power line and an additional 12 prairie chickens using habitat within 101 to 500 m. There are typos in the scientific names in the text.	
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-296	18	lesser (*Tympanuchuspallidicinctus*) and greater (*Tympanuchuscupidolesser*) prairie chickens,	Correct the spelling of prairie chicken scientific names.	References to prairie chickens have been removed.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-296	27-28	Increased EMFs have been shown to alter the behavior of avian species, though species vary in their sensitivity to this disturbance (Fernie and Reynolds 2005).	As noted in Fernie and Reynolds (2005), the strength of the electric and magnetic field depends on the distance of exposure from the source and are highest immediately around a power line and diminish rapidly with distance away from the source. Thus, birds that are only transiently associated with power lines, such as sage-grouse, sustain limited exposure to EMF. Studies that have looked at the effects of EMF on birds are in situations where the birds are nesting only a few feet away from the energized line. Disclose the context in which avian behavior has been shown to be altered by EMF.	Additional information has been added regarding the potential effects of EMF on wildlife species.
3.2.4.6 Wildlife Resources//Environmental Consequences	p. 3-297	3-5	The USFWS also identified potential indirect impacts including (1) increased predation from raptors and ravens along transmission lines and (2) degradation of habitat due to spread of non-native plants and noxious weeds.	Provide a citation for this statement and include in references.	This section has been revised for the Final EIS and this text is no longer included.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-297	7-16	Entire Paragraph	It is established that raptors and ravens use tall structures for perching, and that raptors and ravens prey on sage-grouse and sage-grouse nests. However, that the construction of the transmission line will result in increased raptor and raven activity and consequently result in negative effects on sage-grouse is not established. Dinkins (2013) did not find an effect of the proximity to anthropogenic structures (which included those suitable for perching) or corvid density on sage-grouse nest success. The citation for Ellis (1984) describes a single observation of a golden eagle at a sage-grouse lek. However, the text on p. 297 describes Ellis (1984) as having conducted pre- and post-transmission line observations. Determine if Ellis (1984) is the correct citation. More justification is needed to support the topic sentence that states “Increased predation of Greater Sage-Grouse by raptors and ravens could result due to construction of the transmission line.”	The types of potential effects on Greater Sage-Grouse have been revised to include additional literature citations.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-297	29-31	Degradation of Greater Sage-Grouse habitat due to invasion of non-native plants and noxious weeds could lead to decreased survival of individual birds within affected populations and reduction in habitat-carrying capacity	Provide a citation for this statement and include in references.	The types of potential effects on Greater Sage-Grouse have been revised to include additional literature citations.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-297	36-39	More frequent fires in Greater Sage-Grouse habitats as a result of construction of the transmission line, access roads, and alteration of vegetation communities could result in reduced local Greater Sage-Grouse population size and reduction of suitable habitat available for the species.	This sentence assumes that the construction of transmission lines, access roads, and alteration of vegetation communities from transmission lines will result in more frequent wildfires. Provide a citation for this conclusion; otherwise delete it as being unsubstantiated.	This section has been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-298	4-6	ODFW’s Mitigation Framework identifies a disturbance band of 0.2 mile on each side of access roads with low traffic volumes (0–2 vehicles per 24 hours) be analyzed for impacts and to calculate mitigation acres for low density and non-core Greater Sage-Grouse habitats in Oregon.	No mention of the 0.6-mile buffer of transmission line in this section. Be consistent in application of analysis indicators.	This section has been updated.

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3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-298	7-14	This relationship is central to the NTT recommendation to limit surface disturbance due to anthropogenic development to less than 3 percent. Anthropogenic features traversing and on the periphery of the Baker Greater Sage-Grouse population include urban, ex-urban, and rural development, agricultural lands, airport and landing strips, Interstate 84, several Oregon State Highways and major roads, wind energy facilities, and miles of distribution and transmission powerlines. Though not finalized, the Oregon Sub-Region Greater Sage-Grouse Draft RMPA/EIS is expected to propose a surface disturbance cap, as required under IM 2012-044.	The 3 percent development cap is irrelevant, since BLM does not propose applying the same to this project. Similarly, mentioning the Baker County Greater Sage-Grouse RMP Amendment Draft EIS and what it might propose in terms of a surface disturbance cap does not bear on the analysis in this document. The references to the disturbance cap should be deleted. The statement that IM 2012-044 requires a surface disturbance cap is incorrect. There is no mention of a disturbance cap in IM 2012-044. Similarly, the BLM's interim sage-grouse measures in IM 2012-043 do not include a 3 percent disturbance cap. Therefore, the 3 percent disturbance cap reference should be deleted.	This section has been revised for the Final EIS and this text is no longer included.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-298	7-14	The Proposed Action would have the greatest direct and indirect effects on Greater Sage-Grouse due to the greatest loss of PPH/Core and additional PGH habitat, and potential disturbance to several leks within the Proposed Actions area of influence.	To provide context to the comparison drawn in this sentence, add the underlined phrase: "The Proposed Action would have the greatest direct and indirect effects on Greater Sage-Grouse, compared to the other alternatives."	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-300/ Table 3-70			The impacts as presented in this table make it difficult to clearly understand the change in effects that the Flagstaff and Burnt River Mountain Alternative would have. It might provide a little more clarity to (either instead of or in addition to) show impacts from just the alternative (actual deviation from Proposed Action) and compare that to the portion of the Proposed Action that the alternative is replacing. This would make it easier to understand the question, "what if both the Flagstaff and Burnt River alternatives were chosen?"	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-304/ Table 3-71			Provide detailed maps that show where the 168 acres of bighorn sheep habitat overlaps the analysis area. The confusion may come from the DEIS not explaining exactly what the analysis area is for big game. Is it the 0.5-mile buffer described for wildlife habitat? In which case there would be much less than 168 acres of overlap of bighorn habitat at Burnt River with the analysis area. Or is it the 5-mile buffer? In which case there would be significantly greater overlap of bighorn habitat with the analysis area.	The tables and maps have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-304/ Table 3-71			Why is the table for impacts to Big Game in Segment 3 placed in the Segment 4 section? Move impacts table for Segment 3 to be within the Segment 3 section.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-306	10-11	Though not finalized, the Oregon Sub-Region Greater Sage-Grouse Draft RMPA/EIS is expected to propose a surface disturbance cap, as required under IM 2012-044.	The statement that IM 2012-044 requires a surface disturbance cap is incorrect. There is no mention of a disturbance cap in IM 2012-044. Similarly, the BLM's interim sage-grouse measures in IM 2012-043 do not include a 3 percent disturbance cap. Therefore, the 3 percent disturbance cap reference should be deleted.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-306	12-13	The Proposed Acton would have the greatest direct and indirect effects on Greater Sage-Grouse due to the greatest loss of PPH/Core and additional PGH habitat.	To provide context to the comparison drawn in this sentence, add the underlined phrase: "The Proposed Action would have the greatest direct and indirect effects on Greater Sage-Grouse, compared to the other alternatives,...."	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-308/ Table 3-72			In terms of the 138/69kV Rebuild, wouldn't the existing 69kV's indirect impacts be considered "fully realized" according to the ODFW 2012 Mitigation Framework? If so, presenting acres within 0.6 miles of the existing 69kV would be incorrect. However, since no discussion occurs regarding the 138/69kV rebuild, this leaves readers to make assumptions based on information presented in the table. Recommend removal of acres within 0.6 miles of transmission line and 0.2 miles of new and existing roads for the 138/69kV rebuild.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-303	8-9	…the Proposed Action and all alternatives in Segment 3 could result in long-term moderate impacts to big game.	How can there be long-term moderate impacts to bighorn sheep in Segment 3? Project disturbances do not occur in any mapped bighorn sheep habitat. Project disturbances occur almost 0.5 mile from the mouth of the Burnt River Canyon. Expand on the rationale for this level of impact on bighorn sheep or exclude them from this impact finding.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-310	16-30		First paragraph information should be included in previous section on Columbia spotted frog. Additionally, further support is needed for the effects determination of MIIH.	This section has been updated.
3.2.4.6 Wildlife	p. 3-311	12-14	Though not finalized, the Oregon Sub-Region Greater	The statement that IM 2012-044 requires a surface disturbance cap is	This section has been revised for the Final EIS and this text is no longer

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
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Resources/Environmental Consequences			Sage-Grouse Draft RMPA/EIS is expected to propose a surface disturbance cap, as required under IM 2012-044.	incorrect. There is no mention of a disturbance cap in IM 2012-044. Similarly, the BLM's interim sage-grouse measures in IM 2012-043 do not include a 3 percent disturbance cap. Therefore, the 3 percent disturbance cap reference should be deleted.	included.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-311	15-17	The Malheur A Alternative followed closely by the Malheur S Alternative would have the greatest direct and indirect effects on Greater Sage-Grouse due to the greatest loss of PPH/Core and additional PGH habitat.	Table 3-75 reports that no PPH is within 5 miles of any of the alternatives in segment 5. Modify sentence to remove reference to PPH/Core and read "…due to the greatest impact on PGH habitat."	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-311	15-17	The Malheur A Alternative followed closely by the Malheur S Alternative would have the greatest direct and indirect effects on Greater Sage-Grouse due to the greatest loss of PPH/Core and additional PGH habitat.	To provide context to the comparison drawn in this sentence, add the underlined phrase: "The Malheur A Alternative followed closely by the Malheur S Alternative would have the greatest direct and indirect effects on Greater Sage-Grouse, compared to the other alternatives,..."	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-311	19-20	No PPH or leks are expected to be affected by the Proposed Action or any of the alternatives.	This statement contradicts the statement made just previously on line 16 "due to the greatest loss of PPH/Core."	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-311/ Table 3-74			See vegetation section comment regarding how ecological systems were grouped into primary vegetation groups greatly differed between the DEIS and the vegetation RR. BLM's response to that comment would impact this table. Also, is using USFWS effects determination language appropriate at this stage? Similar to comment made regarding WAGS.	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-318	10-19		Explain how the NI conclusion is reached in comparison to the earlier MIIH.	This text has been deleted.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-318	30-31	…the Oregon Sub-Region Greater Sage-Grouse Draft RMPA/EIS is expected to propose a surface disturbance cap, as required under IM 2012-044.	Considering that Segment 6 is in Idaho, the Oregon Sub-Region Greater Sage-Grouse Draft RMPA/EIS would not be relevant for this analysis.	This section has been revised for the Final EIS and this text is no longer included.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-319	2-3	…would result in long-term high impacts…	While a reader may be able to connect the dots based on impact criteria definitions, to determine that impacts on sage-grouse in Segment 6 would be "long-term high impacts" does not pass the red face test. The habitat in this area that will be directly impacted by the Project has seen a severe modification to fire regimes such that the lower elevations of the Owyhee Front in Segment 6 are ubiquitous annual grasslands that are unlikely to ever provide adequate sagebrush to support any part of the sage-grouse life stage in the future. Explain the difference in BLM's conclusions between the long-term high impacts in Segment 3 vs. long-term high impacts in Segment 6. Segment 6 has 4,615 acres of PGH within 0.6 mi of the transmission line (Proposed Action). Segment 3 has 21,954 acres of PPH and 2 leks within 06. mi of the transmission line (Proposed Action). Despite the difference, the conclusion for impacts is the same for these two segments. Based on management objectives established by the BLM, the policies and procedures for PGH and PPH differ with far fewer considerations for PGH. Further, p318 L28-29 states "Segment 6 is located on the periphery of the heavily populated Treasure Valley which has essentially eliminated Greater Sage-Grouse use nearby and movements through the ROW." Explain the conclusions regarding long-term high impact in Segment 3 and Segment 6, addressing the different circumstances in each segment. Otherwise, delete the reference to long-term high impacts.	The impact analysis methodology has been updated and clarified for the Final EIS.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-322/ Table 3-79			This table format is different than Table 3-76. Consider using the same format for similar impacts tables (Big Game Segment 5 should be the same as Big Game Segment 6).	The tables have been revised.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-227	7-9	Suitable ferruginous hawk nesting habitat, or identified nesting areas would be surveyed for active ferruginous hawk nest sites between March 1 and April 1 within 0.25 miles from construction sites.	The 0.25 miles cited here is incorrect.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-327	30-31	PRC 10—Avoid activities that could result in new noise levels at the perimeter of a lek above 10 dBA from 6:00 p.m. to 8:00 a.m. during the breeding	Clarify that noise impacts will be measured against ambient noise levels by revising the design feature to state "Avoid activities that could result in ~~new noise levels at the perimeter of a lek above~~ an increase greater	This section has been updated.

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			season (March 1 – May 31).	than 10 dBA at the perimeter of a lek from 6:00 pm to 8:00 am during the breeding season (March 1 – May 31)."	
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-328	10-11	PRC 13 - Where priority sage-grouse habitat cannot be avoided, implement no-disturbance buffers around leks and nesting habitat during breeding/ nesting season.	The design features should recognize that the project may avoid or mitigate impacts to sage-grouse, including impacts to PPH. Thus, the no-disturbance requirement should be qualified to allow for avoidance or mitigation in PPH and not prohibit entirely activities within PPH.	This section has been updated. The impact analysis methodology has been updated and clarified.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-328	12-19	PRC 14	Use the term "PPH" and not "priority habitat."	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-328	25-26	PRC 17—In Greater Sage-Grouse PPH, vehicles will be limited to existing roads to prevent 25 damage to Greater Sage-Grouse nesting areas.	The design features should recognize that the project may avoid or mitigate impacts to sage-grouse, including impacts to PPH. Thus, the prohibition against new roads in PPH should be qualified to allow for avoidance or mitigation in PPH and not prohibit entirely activities within PPH.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-329 and 3-330	24	Table 3-80. Residual Effects on Wildlife	The table shows types of impacts, design features applied to reduce impacts, and residual effects. This table is not very useful because it lumps all the impacts together. It would be more useful if the type of impact was paired with the design feature applied to reduce the impact to help understand for example how spatial and temporal buffers would eliminate noise disturbance and disruption of breeding and foraging behaviors. There is little value in the residual effect having a single designation (Low, Moderate, High) when combining all possible impacts. If anyone impact is high, the designation is high.	This section has been updated. The impact analysis methodology has been updated and clarified for the Final EIS.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-330	12-13	Therefore, mitigation would be required to offset the residual effects of the project if the proposed action is chosen in Segment 2.	Clarify why Segment 2 is referred to in this sentence. If a mistake, please correct.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-330	12-13	Therefore, mitigation would be required to offset the residual effects of the project if the proposed action is chosen in Segment 2.	Segment 2 is not the only Segment where impacts to sage-grouse may result in mitigation. Clarify this sentence.	This section has been updated.
3.2.4.6 Wildlife Resources/Environmental Consequences	p. 3-330	19-20	Create common understanding and expectations among the project proponents (i.e., ODFW, IDFG, USFWS, and BLM) and other stakeholders….	Idaho Power, and not the government entities, is the "project proponent." Make this correction. Recommend changing to read "Create common understanding and expectations among the lead agency and cooperating agencies (i.e., …"	This section has been updated.
Appendix B.4	p. B.4-6 and B.4-7/ Table B.4-2		Percent of Acres Affected by Proposed Action and Alternatives	There is no description of how this was calculated. If the same "methods" were used for this as in the vegetation section then this is incorrect. The vegetation section merely used the entire ROW as the Affected/disturbed habitat with no analysis, other than comparing that to the 1 mile Analysis Area.	This section has been updated.
Section 3.2.5 Fish Resources					
3.2.5 Fish Resources	Entire Section	n/a	Scientific names in text	Use the scientific name in-text at the first usage of the common name and not again (unless required to describe taxonomic history). Does not apply to table usage.	This section has been updated.
3.2.5 Fish Resources	Entire Section	n/a	Number format	Have an editor check the style guide for correct number format throughout the Fish Resources section. Typically numbers less than 10 are spelled out unless there are other numbers greater than 10 already presented in the same sentence. There are many instances of inconsistencies in sentences on some numbers spelled out and others presented numerically.	The EIS has been revised for consistency.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-333	16-21	Section 7 of the ESA requires that federal agencies, in consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) Fisheries (also called National Marine Fisheries Service), must ensure any action authorize, funded, or carried out by the federal agency is not likely to jeopardize the continued existences of an endangered threatened, or proposed listed species, or result in destruction or adverse modification of a critical habitat of a species.	With respect to species proposed to be listed under the ESA, federal agencies are not required to "consult" with the USFWS or NOAA, and are not required to "insure" that an action is not likely to jeopardize the continued existence of proposed listed species or result in adverse modification regarding the proposed species' critical habitat. Rather, federal agencies are required to "confer" with USFWS or NOAA on an action that is likely to jeopardize the continued existence of any species proposed to be listed or result in the destruction or adverse modification of critical habitat proposed to be designated for such species. *See* 16 U.S.C. § 1536(a)(4). Clarify the difference in the regulatory requirements for listed and proposed species: "Section 7 of the ESA requires that federal agencies, in consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) Fisheries (also called National Marine Fisheries	This section has been updated.

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				Service), must ~~ensure~~ insure any action authorize, funded, or carried out by the federal agency is not likely to jeopardize the continued existences of an endangered or threatened species~~, or proposed listed species,~~ or result in destruction or adverse modification of designed critical habitat of such a species. Agencies are required to 'confer' with the USFWS or NOAA on any action likely to jeopardize a species officially proposed (by publication in the Federal Register) for endangered or threatened status."	
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-333	23-25	The USFWS and NOAA Fisheries share responsibility for implementing the federal ESA as it relates to fish. In general, USFWS has oversight for terrestrial and resident freshwater species, and NOAA Fisheries for marine and anadromous species.	The statement that USFWS and NOAA "share" responsibility over ESA-listed fish is unnecessary and should be deleted.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-333 to 3- 337	Regulatory Framework		Suggest providing a list of species associated with each (i.e., Endangered Species Act, Magnuson- Stevens Act, PACFISH and INFISH Strategies, Conservation Agreement for Pacific Lamprey, Species Status Species Management, USFS Management Indicator Species, Comprehensive Wildlife Conservation Strategies, Oregon Endangered Species Act) subsection that is applicable to the Project. The list would go at the end of each and identify those fish species applicable to each regulatory framework. If this is not done, then remove the species specific discussions/lists from PACFISH and INFISH Strategies, USFS Management Indicator Species, and Comprehensive Wildlife Conservation Strategies as it confuses a reader to see fish discussed and then not discussed consistently under regulatory framework.	A new table has been developed to address relevant species and incorporated into the Final EIS.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-334	6	…objectives, standards and/or guidelines, hierarchical analysis)….	Change to: "…objectives, standards and/or guidelines, and hierarchical analysis)…."	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-334	7	…Bureau of Land Management (BLM)	The BLM acronym was likely defined earlier in the document. Not necessary to re-defined multiple times throughout this section. Be consistent with the presentation of all acronyms. Inconsistencies appear throughout Section 3.2.5.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-334	37	Additionally, Best Management Practices…	Additionally, Best Management Practices (BMPs)… Acronym is used later in this section and this is the first instance of its use in this section. If defined earlier, then this should just be BMPs and not define Best Management Practices. Not necessary to re- defined multiple times throughout this section. Be consistent with the presentation of all acronyms. Inconsistencies appear throughout Section 3.2.5.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-335	13	…that would reduce and existing…	…that would reduce an~~d~~ existing…	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-335	20	…needs which they may represent."	…needs which they may represent."	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-335	22	…in the analysis area.	The analysis area has not been defined yet and isn't defined until page 3-338. Depending on the style guide for the Project, consider either defining the fish resources analysis area before the regulatory framework (3.2.5.2), or focus wording throughout related to Project instead of using analysis area until it has been defined. Review the use of analysis area throughout Section 3.2.5.2 as its use is confusing since it has not been described/defined for fish resources.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-335	23	…the redband trout and steelhead.	First use of fish species common names. Use the scientific name in-text at the first usage of the common name and not again (unless required to describe taxonomic history). Does not apply to table usage. Make sure this is done consistently in regards to the previous suggestion to provide a list of species associated with each (i.e., Endangered Species Act, Magnuson-Stevens Act, PACFISH and INFISH Strategies, Conservation Agreement for Pacific Lamprey, Species Status Species Management, USFS Management Indicator Species, Comprehensive Wildlife Conservation Strategies, Oregon Endangered Species Act) subsection that is applicable to the Project.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-336	11	…bull trout and Chinook Salmon.	First use of fish species common names. Use the scientific name in-text at the first usage of the common name and not again (unless required	This section has been updated.

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				to describe taxonomic history). Does not apply to table usage. Make sure this is done consistently in regards to the previous suggestion to provide a list of species associated with each (i.e., Endangered Species Act, Magnuson-Stevens Act, PACFISH and INFISH Strategies, Conservation Agreement for Pacific Lamprey, Species Status Species Management, USFS Management Indicator Species, Comprehensive Wildlife Conservation Strategies, Oregon Endangered Species Act) subsection that is applicable to the Project. The word salmon should be lower case in this sentence.	
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-336 and 3-337	17-28 and 29-6	Oregon Fish Passage Regulations Oregon Endangered Species Act	Consider paragraph/subsection order change by having Oregon Endangered Species Act prior to Oregon Fish Passage Regulations.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-336	20	The Fish Passage regulation prohibits construction…	The Fish Passage regulations prohibit~~s~~ construction…	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-336	24	…to NMFS/USFWS…	NMFS has not been defined. This section has selected to use NOAA Fisheries when referring to NMFS. Be consistent with use of NOAA Fisheries or change all references to NMFS and define NMFS at its first use.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-336	25-28	Oregon also has regulations governing removal of or placement of fill in streams and wetlands. These regulations are implemented by the Oregon Department of State Lands (ODSL) and ODFW to protect streams and wetlands (Oregon Revised Statutes 196.795-990) and are described in more detail in Section 3.2.2 - Water Resources.	This paragraph/content is not covered as presented here under Oregon Fish Passage Regulations and should be moved to its own subsection and focus the information on the essential salmonid habitat designated under the Oregon Removal/Fill Law. In addition, it would be more effective to site the text from the Oregon Fish Passage Regulations that provides the regulatory framework associated with permitting fish passage projects if this type of information is believed to be necessary in this section. The ODSL acronym was likely defined earlier. Not necessary to re-define in this section. Be consistent with the presentation of all acronyms. Inconsistencies appear throughout Section 3.2.5.	This section has been updated.
3.2.5.2 Fish Resources/ Regulatory Framework	p. 3-337	5-6	The regulations would affect both the locations and operations of B2H Project facilities.	Consider removing sentence as it is implied by the information provided here under regulatory framework. All subsections under regulatory framework affect the locations and operation of Project facilities.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-338	10-16		This paragraph needs to describe to readers that the analysis areas is the 1,000 feet and 500 feet, but it is associated with the Proposed Action and alternatives. It is not adequately described that the analysis area applies to each. Literature supporting the use of 1,000 feet and 500 feet for the analysis area of the Proposed Action and alternatives needs to be provided. Technically, these distances are valid and there is plenty of literature to support their use as conservative estimates, but they should be substantiated with literature.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-338 and 3-339	16-17	n/a	Suggest that between lines 16 and 17 a paragraph is inserted that describes to a reader two approaches were used for fish resources; the initial method and supplemental fisheries analysis. Further suggest creating a subheading for Initial Methods and include the text on lines 17 – 39 (Page 3-338) and lines 1 – 6 (Page 3-339). This would facilitate the reader in easily understanding the methodology applied to the analysis area. These two approaches make it challenging for a reader to understand which sets of data are being presented later in the section. Separate subheadings should aid in identifying when a specific methodology was used versus the other.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-338	19 29-30	GIS analyses… … and Global Information System (GIS) layers.	The GIS acronym is defined down at line 29-30, but the acronym is used at line 19. The acronym is likely defined earlier and does not need to be defined again. Check document for consistent use of acronyms.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-338	36-37	…defined as a sixth-level Hydrologic Unit Code (6th level HUC, 12 digit code). Maps of the 6th level HUCs crossed…	…sixth level 12 digit hydrologic unit code (HUC). Maps of the subwatersheds crossed… Throughout the remainder of the document anytime the sixth level, HUC, or 12 digit, etc. is used it should only be referred to as the subwatershed. Be consistent and remove all references to sixth level, HUC, 12 digit throughout Section 3.2.5 following lines 36 – 37.	This section has been updated.

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3.2.5.4 Fish Resources/ Methodology	p. 3-339	3		Should this sentence also include USFS management indicator species (MIS)? The text seems to cover special status fish species, listed species, and sensitive species, but it does not reference MIS. Furthermore, there is nearly no reference to lamprey throughout the Fish Resources section. Ensure lamprey were effectively evaluated.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-339	6	…with suitable habitat in the analysis area.	How is suitable habitat defined? What analysis was undertaken to determine suitable habitat? What was the criteria in the analysis? If no species specific field surveys were conducted, as stated on 3-338 lines 25-26, then how was suitable habitat determined? This description and discussion requires further clarification and review.	Habitat identified in published maps and suitable habitat determined during discussions with local fisheries biologists. This information has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-339	8-13	In response…and their habitats.	This is a run-on sentence, or at the very least, very challenging to get through. Suggested revision: "In response to data requests made by the ODFW, BLM, and USFS that focused specifically on the effects of the B2H Project-related road development, Idaho Power prepared and delivered a *Supplemental Fisheries Analysis* dated October 2013 (Idaho Power 2013). This analysis was provided to supplement the information in Resource Report 6 (Water and Fisheries) and address, in part, what fish species may be present along the Proposed Action and alternatives. In addition, the supplemental analysis facilitated in evaluating how the B2H Project could potentially affect, directly and indirectly, those fish species and their habitats." Check for consistency of acronyms used, italics, and citations based on previous comments.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-340	2-4 and 7	Scientific names in text	Use the scientific name in-text at the first usage of the common name and not again (unless required to describe taxonomic history). Does not apply to table usage. This needs to be checked throughout the entire Fish Resources section.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-340	22-24	…B2H Project road activities. Project roads and transmission line routes and other ancillary features were individually overlaid with subwatershed and general land ownership layers using the ArcGIS "Identity" tool.	This paragraph is under Access Road Impact subheading on line 19. Why are transmission line routes and other ancillary features being described in this subsection? Based on the subheading this should focus on how access road impacts were analyzed. Suggested revision: …B2H Project road activities. Project roads were overlaid with subwatershed and general land ownership layers, and using ArcGIS geoprocessing tools.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-340	22-25	…B2H Project road activities. Project roads and transmission line routes and other ancillary features were individually overlaid with subwatershed and general land ownership layers using the ArcGIS "Identity" tool. Where applicable, the resulting files were further identified with the resource layers, supporting the table templates and summarizing impacts in a standard format. The following describes how the resource layers were developed before running them through the "Identify" data model to produce the individual tables….	Review the methods that describes how the Supplemental Fisheries Analysis was conducted. This description seems incorrect and confusing on what the "Identity" tool actually does/did. Consider revising text: "Data to support the road impact analysis were organized under four tasks, which are described below. Using the GIS data described above, GIS analysis was conducted to help address potential effects to fish resources from B2H Project road activities. Project roads were overlaid with subwatershed and general land ownership layers, and using ArcGIS geoprocessing tools. Where applicable, the resulting files were further overlaid with other resource layers. The impacted areas were calculated and the results exported in a standard table format. The following describes how the resource layers were developed to produce the tables presented in Appendix A."	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-340	38	All crossings fell…	Confirm that this is the case for <u>all</u> crossings falling on intermittent, perennial, or canal/ditch and there were no ephemeral. This sentence seems a little out of place for a methods section as it is describing results; however, it can likely stay as it does provide a basis for crossing types. In general, please review the methods and affected environment and ensure that Project related results or effects are only discussed in Environmental Consequences.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-341	2-3	…Type 2 impacts equaled 0.02-acre each, and crossing Type 3 impacts equaled 0.17-acre each.	How were the acreages determined? This could be problematic if the acreage is not conservative.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-341	10-13	…The crossing points were manually evaluated and assigned fish distribution attributes….Crossings were identified with Regional Gap Analysis Program	This paragraph seems like it is combining two analyses together. Furthermore, the wording is confusing. How were fish distribution attributes assigned? What does the Regional Gap Analysis Program	This section has been updated.

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			vegetation data to…	have to do with streams within 1,000 feet? Review and revise this paragraph.	
3.2.5.4 Fish Resources/ Methodology	p. 3-341	18-19		This bullet is different than the previous and needs to be consistent with the others by providing a description after a colon is used at the end of Supplemental Fisheries Analysis.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-341	20-21		This bullet is inconsistent with the previous bullets and requires some form of introduction to the information provided in subsequent bullets. Clear information needs to be provided to describe to the reader what this is and what the output below is presenting.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-341	23	…(Table A-5 in Appendix A of the Supplemental Fisheries Analysis) documents where native…	Suggested revision to make consistent with previous bullets: … (Table A-5 in Appendix A of the Supplemental Fisheries Analysis): This calculation reports where native…	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-341	27-31	…500 feet of road segments that do… *Road and Other Project Facility Disturbance*… (Table A-6 in Appendix A…Fisheries Analysis): Project road centerlines were buffered 500 feet on either side.	This task description indicates it's just for roads, but the bullet below indicates it is for roads and other project facility disturbance. It goes on to only focus on just roads. Ensure consistency in what analysis was performed and for what aspect of the Project.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-341 and 3-342	42 and 1-10		This bullet is inconsistent with the previous bullets and requires to revise text to make consistent with previous bullets.	This section has been updated.
3.2.5.4 Fish Resources/ Methodology	p. 3-342	9-10	This table is not included in this Draft EIS.	Why is the table not included? Although the table is not included, on page 3-359 road density is presented. Resolve inconsistency of information presented. Road density is a good indicator to use for evaluating existing and proposed conditions, but as it is currently presented in this section it is confusing. See comment below regarding information presented on page 3-359.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-342	12-15	…cross eleven 4th level HUC subbasins…General effects to fish are discussed at the subbasin level (4th level HUC); effects to special status fish, essential fish habitat and critical habitat are discussed at the subwatershed level (6th level HUC).	If the effects are discussed at the subwatershed (sixth level 12 digit HUC) scale, why are any general effects discussed at the fourth level eight digit HUC? Using multiple scales in an analysis becomes cumbersome and confusing to a reader, as well as can result in an inconsistent analysis. In addition, later in the section the fifth level 10 digit HUC is also introduced. Consider revising to simply including a table on page 3-342 that provides fourth, fifth, and sixth levels in one single table so the reader can easily cross-walk. Furthermore, it is highly recommended to focus the analysis for the fish resources section at the sixth level (i.e., subwatershed) only, following a table that shows the cross- walk between the fourth, fifth, and sixth. Correct use of "6th level HUC" and simply use subwatershed, as it was previously defined. If it is necessary to use the term "6th level HUC," only use one of the following: sixth level; 12 digit HUC; or sixth level 12 digit HUC. The use of "6th level HUC" confuses readers of an EIS regarding the scale being discussed.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-342	17	… (HUC 17070104 in the in the Middle Columbia River…	Remove repeated text if information not put in table for cross-walk as describe above: … (HUC 17070104 in the Middle Columbia River…	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-342	29	The six project area segments roughly correspond with hydrologic basin boundaries in the project area.	Project in two instances is not capitalized. Check on consistent capitalization where appropriate based on the style guide. The term basin that is used indicates one scale (third level) and yet above there are two other scales (fourth and sixth levels). What scale does the segments roughly correspond with? Revise text.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-342	30-36		Ensure correct and consistent use of the terms analysis area, Proposed Action and alternatives, and B2H Project throughout the Fish Resources section. Where and how these terms are used must be correct. The current application of these terms in the Fish Resources section reads as multiple scales of analysis being presented throughout the entire section and does not provide a means to understand the extent of the affected environment or the environmental consequences associated with the Proposed Action and alternatives. The approach taken throughout the section using analysis area, Proposed Action and alternatives, and B2H Project reads inconsistently, or at the very least	This section has been updated.

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				would be extremely challenging for the public to understand. The current application of these terms, combined with the scale issue of discussing basins, subbasins, watersheds, and subwatersheds, has resulted in multiple scales of analysis that is not clearly or consistently presented. Both of these scale issues need to be addressed as the current approach borders on being a serious error in the analysis for the Fish Resources section. Consider providing literature citations to support statements provided in this paragraph.	
3.2.5.5 Fish Resources/ Affected Environment	p. 3-343	2-17		Use the scientific name in-text at the first usage of the common name and not again (unless required to describe taxonomic history). Does not apply to table usage. Note, first use of Middle Columbia River summer steelhead is in this text. If the acronyms MCR is used throughout as it is later in the fish resources section, the acronym should be defined here. Review text for use of “is” versus “are.” Review text for capitalization of “project.” Review text for appropriate use of analysis area versus Project area.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-343	25	…management indicator species.	MIS acronym is already defined; please revise text.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-343	30	Based on an assessment…	Describe shat assessment was conducted. Was it a review of literature, fish distribution GIS layers, etc.? Define what was done or if it is from the previous analysis described.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-343	30-34		Wording in this paragraph should be reviewed and likely revised. The order and structure of information needs to be improved.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-343	33	…distinct population segments…	Check to see if DPS has already been previously defined. If so, please use acronym.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-343	35	…Snake River basin, however neither…	Check for consistent use of Basin versus basin throughout the section. Consider revising text to the following…Snake River Basin; however, neither…	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-344	1-5		Check for acronyms use and confirm use of italics in this paragraph. Tables 3-81 and 3-82 should be included under this text before the next section starts on line 15.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-344	6 -14		Provide literature citations for this paragraph to support the statements being made.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-344	12	…limited to the 0.5º Fahrenheit limit on class 1 streams…	Revise text: …limited to a 0.5º Fahrenheit… The acronym “F” is used later for Fahrenheit, but not defined here. What does …limited to the 0.5º Fahrenheit limit exactly mean? Is it saying limited to a 0.5º Fahrenheit increase or decrease? Revise text to clarify. Stream classes have not been used or defined for this Project. If stream classes are used, they will require defining exactly what they are, where they apply, and what implications are associated with them.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-344	12-13	…the Oregon and Idaho state regulations.	What regulations are these referring to?	This paragraph has been deleted. Pertinent information has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-344	19	… (NPCC 2004).	Check citation. The subbasin plan has been finalized, this is referenced the previous version.	It appears that 2004 is the most recent citation. The subbasin plan was updated but not finalized.
3.2.5.5 Fish Resources/ Affected Environment				Use the scientific name in-text at the first usage of the common name and not again (unless required to describe taxonomic history). Does not apply to table usage. Check for use of DPS and not ESU associated with steelhead. Check correct use of ESU. Check acronyms that have been previously defined or have not been	This section has been updated.

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				defined.	
3.2.5.5 Fish Resources/ Affected Environment	p. 3-344	28-30	MCR summer steelhead….entry into freshwater.	Revise these sentences. Awkward sentence structure.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-345/ Table 3-81		Species (column)	Consider adding parentheses around species scientific name. Use *O.* after the first use of *Oncorhynchus*. Follow similar formatting as Table 3-82 for common and scientific name format. This should be done for tables and text.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-345/ Table 3-81		ESA T, CH, BLM, USFS, MIS, O-SC	The status layout is confusing and could be more effectively presented. In addition, the BLM, USFS, MIS presentation of status doesn't indicate what this is associated with (i.e., special status, MIS, sensitive).	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-345/ Table 3-81		Moderate to high [2] (potential habitat only)	Remove all discussion of Snake River Basin steelhead associated with Segment 3. As noted in the Fish Resources section, steelhead have been extirpated from all tributaries of the upper Snake River due to the construction of the Hells Canyon Dam Complex. Because the species does not occur, the species should only be discussed as not present in the analysis area in Table 3-81 and then removed from all further discussions as done with other species. Change in Table 3-81 text from DEIS to N. Recommended that if the author feels this information is absolutely necessary to include in the cumulative effects analysis if there is a reasonable foreseeable action that would result in steelhead upstream of the Hells Canyon Dam Complex.	This section has been updated. Comment noted.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-345/ Table 3-81	11-14	Table Notes: … [2] This information…	Remove Table Note [2] completely.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-346/ Table 3-82		Project Area	Check for consistency of use between Project Area (including capitalization), analysis area, and Proposed Action and alternatives. There should be consistent use throughout the section related to the information being presented in both the affected environment and environmental consequences.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	1-15		Text in these two paragraphs needs review and editing. In addition, literature citations for the information being presented should be included. Review use of the phrase Project "route." Consider revising use of phrase subbasins/segments.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	9-10	…and Critical Habitat (CH) for MCR…	This is the first instance where critical habitat has been capitalized; consider consistent approach throughout. There are too many acronyms used throughout the Fish Resources section; consider spelling out critical habitat instead of using CH as an acronym. If the acronym is used, go back to earlier in the section where the first use of critical habitat is mentioned and define acronym there.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	16		There is no mention of the ESU for Chinook salmon here, but it is described for other segments. Check for consistent capitalization of words such as subbasin, which has not been capitalized here, but there are multiple instances where it is capitalized.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	17-18	The following information is excerpted from the Northwest Power and Conservation Council (NPCC) subbasin plan for the Umatilla River/Willow Creek subbasin (NPCC 2004).	Consider revising to: The following information is excerpted from the Umatilla River/Willow Creek subbasin plan (NPCC 2005).	It appears that 2004 is the most recent citation. The subbasin plan was updated but not finalized.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	23	…June (citing Zimmerman and Duke 1996).	Check based on style guide if this should be instead: …June (Zimmerman and Due 1996 as cited in NPCC 2004). If this is changed to the comment style, then go through Fish Resources section and change throughout.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	25	…Umatilla River Subbasin. However, oral testimony…	Consider revising to: …Umatilla River subbasin; however, oral testimony…	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	36-37	The following information is excerpted from the Northwest Power and Conservation Council (NPCC) subbasin plan for the Umatilla River/Willow Creek subbasin (NPCC 2004).	Consider revising to: The following information is excerpted from the Umatilla River/Willow Creek subbasin plan (NPCC 2005).	It appears that 2004 is the most recent citation. The subbasin plan was updated but not finalized.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-347	38-39	…early in the20th century. From 1966 to 1969 and then starting again in 1987 hatchery…	Consider revising to: …early in the 20th century. From 1966 to 1969, and then starting again in 1987, hatchery…	This section has been updated.

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3.2.5.5 Fish Resources/ Affected Environment	p. 3-348	7-9		Provide citations for this information.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-348	8	…temperature and spawn time.	…temperature and spawning timing~~e~~.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-348	9	…the Umatilla before…	…the Umatilla River before…	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-348	14	…MSA for…	Confirm this acronym for the Magnuson-Stevens Act has previously been defined if it is used. Suggest not using an acronym for this as it is not a frequent term used throughout the Fish Resources section.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-348	26	…in all tributaries used by Snake River Chinook salmon…	Snake River Chinook salmon have not been discussed yet and are not discussed until page 3-349. Suggest providing the tributaries related to Snake River steelhead.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-348	27	The ICTRT identified six MPGs…	ICTRT and MPGs have not been defined in the text. If there is only one occurrence of an acronym that is used it is recommended to spell out the term instead of using acronyms. The Fish Resources section uses excessive amounts of acronyms and makes it difficult for the public to follow.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-348 and 3-349			Review the order of information being presented for Snake River steelhead and spring Chinook salmon. The order of the information needs checking and a more effective approach in presenting the information.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	3	…identified as A-runll and –B runll…	…identified as A-run~~ll~~ and B-run~~ll~~…	Revised
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	4-6	B-run fish predominantly reside in the ocean for 2 years, while A-run fish typically spend only 1 year in the ocean.	Suggested: "A-run fish typically spend only one year in the ocean, while B-run fish predominantly reside in the ocean for two years."	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	12-13	Within the Upper Grande Ronde River subbasin and the analysis area (Segment 2) for the Proposed Action and alternatives, SRB summer steelhead and designated CH occur in the following streams:	Suggest replacing with: Within the Upper Grande Ronde River subbasin, and specifically in the analysis area of the Proposed Action and alternatives within Segment 2, Snake River Basin summer steelhead and designated critical habitat occur in the following streams: There are too many acronyms used in the Fish Resources section. Consider spelling out Snake River Basin and critical habitat. If the SRB acronym is used, this is the first instance of the acronym and it would need to be defined.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	18	Snake River spring Chinook Salmon (*Oncorhynchus tshawytscha*)	This subsection discusses spring, summer, and fall Chinook salmon. Consider revising the title or separating out the discussion.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	18	Snake River spring Chinook Salmon (*Oncorhynchus tshawytscha*)	This subsection discusses spring and summer Chinook salmon and provides life history information, but only mentions fall Chinook salmon. Either provide information associated with fall Chinook salmon or remove all together. Fall Chinook salmon do not occur within the analysis area associated with either the Proposed Action or alternatives and should be removed from all discussions. Suggest providing a subsection at the beginning of 3.2.5.5 or near Table 3-81/82 to describe species considered, but excluded from further analysis. This would include Snake River Basin steelhead upstream of the Hells Canyon Dam Complex and Snake River Chinook salmon fall-run all together. Consider including a sentence that Coho salmon and Pacific lamprey are not known to occur in Project segments 2-6 and no further discussion is provided.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	21-22	Spring, summer and fall Chinook salmon…	Utilize the Federal Register or other literature citations to support the ESU and NOAA Fisheries related information in this subsection as was done for Snake River Basin steelhead on page 3-348.	*Federal Register* language added.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	22	…an Evolutionary Significant Unit (ESU) by NMFS 1999.	ESU was previously defined; no need to define acronym again. Throughout the section NMFS has not been defined and has been referred to as NOAA Fisheries. Be consistent with terms used throughout the section.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	22-27	…The Snake River spring/summer/fall Chinook ESU…the Tucannon River, the Grande Ronde River, the Imnaha River, and the Salmon River…the Tucannon River, Imnaha River, and Grande Ronde River hatcheries in Oregon…in Idaho.	Revise these sentences and provide a disclosure of which are applicable to the Project. As presented the reader cannot tell if all of these are associated with the Project or not. This subsection specifically needs to describe what is included in the analysis area affected environment associated with the Proposed Action and alternatives.	This section has been updated.

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3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	28	…summer Chinook enter…	…summer Chinook salmon enter…	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-349	34-36	Within the Upper Grande Ronde River subbasin and the analysis area (Segment 2) for the Proposed Action and alternative, Snake River spring Chinook salmon occur in the mainstem Grande Ronde River.	Suggest rewording to: "Within the Upper Grande Ronde River subbasin and specifically in the analysis area ~~(Segment 2)~~ of the Proposed Action and alternatives within Segment 2, Snake River Basin spring Chinook salmon occur in the mainstem Grande Ronde River.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-350	3-8		Consider adding pertinent information from the 5-year status review (77 FR 13248 13251). This same comment would be applicable to all species and the most recent status reviews.	Language from the 2015 Bull Trout Recovery Plan has been added.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-350	9-27		Citations are needed for this subsection. Although it is likely most of this information came from the BLM-USFS (2013), and the Buchanan et al. (1997) citation, there are a lot of scientific facts presented without a lot of supporting literature. This is done throughout the entire Fish Resources section and should be reviewed in more detail.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-350	25-26	…50°F. Depending on…to six inches (in) deep…	Review acronyms to ensure they were defined earlier or they aren't being defined after the spelled out term has previously been used.	Acronyms have been reviewed.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-350	28-39		Check for correct use of Proposed Action, Project analysis area, analysis area, etc. There needs to be a consistent presentation to the reader of the scale of which the discussion is focused. In this paragraph it isn't clear at which scale the discussion is occurring and if any alternatives are applicable. Based on the information presented, it does not seem bull trout occur specifically in the analysis area of the Proposed Action and alternatives within Segments 2 and 3. If this is the case, which the data seems to confirm, this needs to be disclosed and the potential occurrence in the affected environment and potential effects in the environmental consequences needs to be revised in the Fish Resources section. As it is now, it reads as though bull trout are present specifically in the analysis area of the Proposed Action within Segments 2 and 3. This needs to occur for all species by ensure the reader understands which species actually are present or have the potential to be presented in the affected environment. The current approach is misleading and does not clearly disclose the actual information. Continuing to refer the reader to the Appendix to disclose the actual distribution when the text is confusing also creates further concerns of disclosing potential impacts.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-351	5-12		Provide literature citations to support the information throughout this subsection.	Text and citations added.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-351	5	… (*Oncorhynchus mykiss gairdneri*) is a subspecies of O. mykiss…	… (*O. mykiss gairdneri*) is a subspecies of *O. mykiss*… Redband trout are first identified on page 3-335, but the scientific name is not provided there. Here the scientific name is provided and underlined. Need to review all species name and at first instance provide the scientific name not underlined.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-351	8-9	…proposed Project. Redband…within the Project area.	Ensure consistent use of terms and application throughout the Fish Resources section.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-351	11-12	…the Northwest Power and Conservation Council subbasin plan for the John Day River in central Oregon (NPCC 2005).	…the John Day River subbasin plan (NPCC 2005).	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-351	11-25		Provide information discussing redband trout related to the Project and not from the John Day River subbasin plan (NPCC 2005). There is plenty of literature and information that would be more specific and applicable to the Project. There is a lack of consistency throughout on scientific names for fish species. In addition, on line 16 the term Subbasin is capitalized, but has not previously been. Review these paragraphs and revise.	This section has been updated. Pertinent information from NPCC 2005 was not replaced.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-351	30	…10 inches…	The acronym for inches was defined on the previous page.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	4	…ODFW 1995) (NPCC 2005).	Confusing presentation of citations. Revise.	This section has been updated.

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3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	5	…Middle Columbia River (MCR)…	Acronym review.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	7-8	…Proposed Action and/or access roads, …	Review terms used here as it relates to analysis area.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	9	… (SRB)…	Acronym review.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	11	…Proposed Action and alternatives and/or access roads …	Rreview terms used here as it relates to analysis area.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	17-18	…The *O. m. gairdneri* populations…	…The redband trout populations…	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	22	… (NPCC 2004b)…	Confirm literature citation, this may be 2005.	Citations have been reviewed.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	23	…Proposed Action and alternatives and/or access roads …	Review terms used here as it relates to analysis area.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	25	…Velvet Creeks.	…Velvet creeks.	This section has been updated.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352 and 3-353	28-39 and 1-21		This entire section seems unnecessary and the majority of the content should be placed in other portions of the fish resource section. Lines 29 – 35 on page 3-352 belong in the special status fish species subsection on page 3-343. The remainder of the information in this section belongs in the environmental consequences section as it not describing the affected environment.	This section has been deleted.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-352	29	…was assumed for all…	Which method is this describing? For the supplemental analysis this was not the case, but yet the content makes it sound like it was. Revise this paragraph according to the method that was used. The way this sentence reads it is technically incorrect.	This section has been deleted.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-353	4	…by HUC…	This is technically incorrect and does not demonstrate what scale is being discussed. Is this the 12 digit HUC, 10 digit HUC, 8 digit HUC? There have been many scales of analysis presented that, beside the fact HUC is incorrect to use, it would difficult to determine which scale is being presented.	This section has been deleted.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-353	5-9		Is the text in this paragraph describing the analysis area again? Revise and clarify the text.	This section has been deleted.
3.2.5.5 Fish Resources/ Affected Environment	p. 3-353	10-11	…in the ODFW database.	Revise and provide citations of what ODFW database is being referred to.	This section has been deleted.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-353	23-25	The analysis of impacts….operations activities would be…actions in the literature.	The sentence is confusing and needs to be revised. While the point is understood, the information stumbles in presentation. In addition, if literature was used, please provide those citations as they are lacking in both the affected environment and environmental consequences.	This section has been updated. New table incorporated with citation/source.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-353	25-29	This analysis…nearby ground disturbing…cleared riparian areas…proposed stream crossing methods…would be implemented.	The sentence is confusing and needs to be revised. While the point is understood, the use of commas and semicolons needs to be revised. Furthermore, the term design features on line 28 has not been defined and lacks any sort of Project specific information.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-353	31	…to be present in all perennial streams and in all intermittent…	Which method is this describing? For the supplemental analysis this was not the case, but the content makes it sound like it was. Revise this paragraph according to the method that was used. The way this sentence reads it is technically incorrect.	This section has been deleted.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-354	3	…the study corridors	The study corridors have not been defined. Is this the analysis area? Project area? What scale is being used?	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-354	4	…design features…	Again, design features have not been defined and lacks any sort of Project specific information.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-354/ Table 3-83			Review and revise Table 3-83 and its application throughout Environmental Consequences. The application of the criteria throughout Environmental Consequences does not always appear consistent. Although the criteria could be used, there is a lack of specificity that is necessary. Terms such as rare, significant, important, and value likely require some level of specificity from how they are currently presented in the table. In addition, the difference between some criteria for non-listed species does not seem different between moderate and low in intensity of impacts. There should be a clear distinction between	This section has been updated.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
				magnitude and scale of impacts associated with intensity and currently it is fairly vague. The term Proposed Action is used with no reference to alternatives.	
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-355	2	…would not be approved by the BLM or USFS…	…would not be implemented…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-355	5-9		This paragraph lacks connection to level of intensity identified in Table 3-83. Revise by providing a connection of actions to intensity of impacts.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-355	7	…of stream-crossing access…	The wording of this needs to be revised. Be specific and consistent throughout the entire section when using the terms stream-crossing and access road in regards to what is being referred to, described, or evaluated. Each have different levels of impacts and based on the methods have different analysis approaches.	This section has been deleted.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-355	10	Access Roads	The title for this subsection is Access Roads, yet the majority of this subsection discusses stream-crossings. In addition, there is some discussion throughout this section regarding the transmission line. Revise and be consistent with the information and analysis results being presented.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-355	11-23		Literature citations are needed throughout this paragraph to substantiate the information being presented.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-355	24	…the stream crossing types that would be…	…in general, the stream crossing types that would be…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-355	32	…Revised POD…	Check to make sure this acronym was defined earlier.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-356	19	…with Agency-approved…	Check to make sure agency should be capitalized.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-356	30-32	…All perennially flowing streams and canal/ditches would have a Type 3 culvert crossing or other crossing type specified by jurisdictional agencies at the time of final engineering design.…	Confirm this is correct that all perennially flowing streams and canal/ditches would have Type 3 culvert. This does not seem correct and makes the assumption that even existing crossing that may be adequate for use would have Type 3 culvert if they are on perennially flowing streams and canal/ditches. Which is incorrect. The text needs to be revised to describe the actual Project activities regarding road crossings. This will require coordination with other sections in the DEIS to ensure that the correct application of terminology is described and the effects are correctly evaluated. In addition, please confirm the language associated with "or other crossing type specified by jurisdictional agencies at the time of final engineering design." This seems technically incorrect as well.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-356	34	Crossings of intermittent streams would be by Type 2 drive through ford.	The wording makes this sound like all intermittent streams crossed by the Proposed Action or alternatives would be by Type 2 drive through ford. This would not be the case. Consider revising text to be more generalized than all encompassing.	This section has been updated
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-356	41	…during the project design…	…during the Project design…	This section has been updated.
3.2.5.6 Fish Resources / Environmental Consequences	p. 3-357	4-21		Literature citations are needed to substantiate the information.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-357	27-34		All this information should be moved up above line 13 as the information is describing specifics similar to the information in lines 4 – 8.	Lines 4 through 8 have been deleted.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-357	36-37		The text in the sentence is confusing and discusses road construction and improvement again, yet on page 3-356 the title is Access Roads. These subsections should focus on the types of Project effects and separate the effects out (e.g., Stream Crossings, Access Roads, and Vegetation Removal). Ground disturbing activities is done for each of the effects. This subsection seems like it double counts the impacts.	This section has been deleted.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-358	15-27		These paragraphs lack a connection to intensity of impact described in Table 3-83.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-358	15-16	…would be similar to…	What effects are they similar to? From a reader standpoint the effects still have not been clearly defined.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-358	19	…through increase erosion…	…through increased erosion…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-358	22	…in the study area…	Confirm this is a term to be used. It has not been defined or used in the Fish Resources section.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-358	29-32	CH is defined...fish species…under the MSA…the B2H Project area.	The information in these sentences belongs in the Affected Environment subsection.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-359	1	…or other structures…	Identify what other structures is this referring to.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-359	7-9	Specific analysis in the…B2H Project area…because of a lack of useable data.	This seems incorrect. There is useable data on EFH within the B2H Project area. Revise. In addition, there is reference to where EFH is present or absent in the analysis area throughout the Environmental Consequences.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-359	10	…the Proposed Action…	And alternatives?	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-359 and 3-360	10-37 and 1-7		Road density impacts or intensity is not demonstrated through Table 3-83. In addition, what is the relationship to this and protected fish habitats, which is the heading that this information is presented under? Road density is a typical indicator used by the Services for listed fish species, but has not been presented this way here. Earlier in the Fish Resources section it is stated that the table on road density is not provided, yet here is information on road density. The presentation of the material and the order of the information needs to be reviewed and revised. It is appropriate to present road density, but its location, approach, and lack of establishment in the affected environment or in Table 3-83 makes it confusing. Literature citations for the information presented are needed throughout. The scale at which the information being presented is confusing. It says watersheds, but due to the scale issues outlined in the affected environment the reader cannot understand how the effects are being evaluated.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-359	36-37	…in these 6 subwatersheds…the Proposed Action, but…	Clarify. The way it is presented is that out of 105 subwatersheds, 6 may have some increases in peak runoff and sedimentation. Is this correct? Is this just for the Proposed Action or alternatives as well?	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-360	1	…in these basins…	Should basins be capitalized? Confirm this is the Basin scale being discussed and not watershed, subwatershed, or subbasin. Scales continue to be problematic throughout the Fish Resources section.	Punctuation revised.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-360	8		Design Features are defined here. Note design features are mentioned in previous subsections, but never described/defined. Comments above related to the term design feature are indicating it should be pointing to this information. This information should also likely be presented earlier in the DEIS, with only the applicable ones to Fish Resources presented in this section.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-362	36-37	Residual impacts…prescribed design features	Revise this sentence because as it is written it sounds like the residual impacts will result from the design features, which would be implemented to avoid and minimize impacts from the Proposed Action and alternatives.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363	1-2	…implementation of a stormwater protection plan to control erosion and prevent…	Why is only one of the design features called out? Review and revise.	This section has been updated.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363	16	…the Proposed Action…	And alternatives?	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363	16-25		Review and revise the wording in this paragraph. There is data and an analysis was performed on ground disturbance within 500 feet. The results are presented in the Supplementary Fisheries Analysis. This analysis, as pointed out earlier in the Fish Resources section, uses the best available data, as required, to perform the effects analysis. The approach taken to calculate the impacts within 500 feet is an extremely conservative approach. Remove paragraph or revise to accurately present what is being used in the analysis.	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363	22-23	However, the total amount…within all Project Segments.	Remove this sentence. This is a subjective statement that is contrary to the analysis being performed using 500 feet. The sentence has no basis and is not supported by any analysis or even professional judgment.	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363	24	…preliminary data…	Remove the word preliminary.	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363	26-27	Table A-3…known fish species where present…of a crossing.	Is this referring to the analysis area associated with the Proposed Action and alternatives?	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363	34	…reduce and avoid impacts.	…reduce or avoid impacts.	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-363 and 3-364	38-39 and 1-2	The categorization and calculation…of fisheries effects. The information provided…the Draft EIS and Final EIS.	Remove these two sentences. The first sentence injects a forced fatal flaw in the Fish Resources section of the DEIS. The data used and the analysis performed provide the best available approach which is all that is required.	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-364	4 -5	… (5th level HUCs).	Revise throughout the section. Why are descriptions at the fifth level being provided? There are now at least three hydrologic scales being discussed, if not four. This is unnecessary and confusing. Revise throughout.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-364	10	...proposed access roads that…	Does this include transmission line too, or just access roads? Is this information summarizing both the Proposed Action and alternatives?	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-364	13-14		Consider moving Table 3-84 after line 13.	New tables have been developed and relocated in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-364	15-20	The Proposed Action…would be on intermittent…several proposed…within possible fish…indicates the estimated ground disturbance…each access road crossing type (culvert/ford) within the…	Is this total access like on page 3-367 line 23? There are inconsistencies in how the quantities of road miles, number of crossings, amount of ground disturbance (e.g., acres total for all road crossings versus no acres presented, versus acres of ground disturbance within 500 feet of perennial streams). Make discussion of quantities in each section consistent so that the reader can follow and compare between sections the quantities presented. As it reads now it is not consistent (e.g., switches quantities presented, does not present quantities, or presents new quantities not previously presented). It is challenging for a reader to follow and compare between segments and alternatives on total numbers (e.g., total number for that segment and alternative that include total access, t-line and road crossings, 500 feet of perennial streams, etc.). Just organize the information and be consistent in what is being presented and the order it is presented in. Nowhere in this paragraph is ground disturbance acres within 500 feet of perennial streams presented as is done on page 3-367 line 25. Be consistent. Remove (culvert/ford).	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-364	22	There are 4 proposed…	Confirm number use per style guide.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental	p. 3-364	26	…and other factors.	Describe what the “other factors” are. This is a vague conclusion that should be defined.	This section has been updated.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
Consequences					
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-364 and 3-365	27-38 and 1-2		This paragraph should be moved to the affected environment section.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-365	3-14		The layout of this information is very well done and should be used as a template for the remainder of the effects analysis. Consider following this example for all subsections, subwatersheds and effects analysis.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-365	13	…a low amount of…	Throughout the effects analysis acres are presented instead of qualitative statements like "low." Consider revising to include acres here.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-365	17	…1000 feet…	…1,000 feet…	Revised
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-365	23	…low indirect…	Throughout the effects analysis acres are presented instead of qualitative statements like "low." Consider revising to include acres here.	Revised
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-365	26	…at least 8 fish-bearing…	Remove "at least." Check number use, please use style guide for consistency.	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-365	32	...there could…	…there would…	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-366/ Table 3-84			Move table up to page 3-364.	This section has been updated. The Supplemental Fish Analysis is not used in the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-366/ Table 3-84			Check table for use of commas (e.g., 1,000 Feet).	New tables have been developed for Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-366/ Table 3-84	2	CH – critical habitat.	CH = critical habitat.	New tables have been developed for Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-366	8	…same fish bearing…	…same fish-bearing… Review entire Fish Resources section for consistent hyphenation of "fish-bearing."	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-366	23	…would have a negligible reduction of…	There are two less within 500 feet. Is the negligible statement relative to the Proposed Action? Review effects conclusion throughout the Environmental Consequences subsection to ensure the criteria in Table 3-83 is correctly and consistently applied.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-367	7	…would have a negligible reduction of…	There are two less within 500 feet. Is the negligible statement relative to the Proposed Action? Review effects conclusion throughout the Environmental Consequences subsection to ensure the criteria in Table 3-83 is correctly and consistently applied.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-367/ Table 3-85			Table 3-85 is inconsistent with Table 3-84 and presents information that should be included in the affected environment. The number of road crossings by alternative and by species is the information necessary for the effects determination. Revise Table 3-85 to be like Table 3-84. Make column headings in table the same as Table 3-84. EFH is not included as is done in Table 3-84. Disclose to the reader why this is not included, perhaps in the notes. Under the column titled Construction Ground Disturbance within 500 Feet (acres) the numerical value of acres is not presented and only a "Y" to indicate yes, present. Revise this entire table as it does not facilitate in the impact analysis. Instead, provide number of crossings and acres so they can be compared across alternatives consistently and evaluate the intensity of impacts.	New tables have been developed for the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-367	20	The streams in the watersheds of…	Why is information being presented at the fifth level? The scale issue continues to be very problematic throughout this section. Recommend sticking with sixth level 12 digit HUCs for analysis. Smaller scale and quantification has occurred at that level.	This methodology is not used for the Final EIS.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-367	20-28		Text needs to be revised to be similar in presentation as Segment 1 effects. All effects analysis for Segments 2 through 6 should be similar to Segment 1 so a reader can easily compare impacts across segments and alternatives. In addition, the application of the criteria from Table 3-83 seems to be applied consistently for each Segment, but not necessarily across the scales of segments. This requires a review and revisions to ensure consistent application of the intensity of impact across and between segments and alternatives. This further demonstrates the need for a consistent scale of drainage (i.e., sixth level). Conduct review and revisions for each of the segments.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-368	4	Snake River Basin (SRB)…	Acronym.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-368	1-10		Check the effects analysis throughout. The scale of effects seems inconsistent lumping subbasin versus subwatershed. In Segment 1 low to moderate and here high. Logic needs to be transparent and consistent across alternatives and at the same scale.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-368	12-15		Why mortality here and not in the Segment 1? How is this that different? There is one crossing in Segment 1 and four crossings in Segment 2 with steelhead (as well as redband in Segment 2). Will having three additional crossings results in a higher mortality versus just the one crossing? What is the threshold then for this change in effects determination? This intensity is not effectively demonstrated between the information in Table 3-83 or the individual impact determinations by segments.	This section has been updated and edited for the Final EIS.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-368	21	…within 1000 feet…	…within 1,000 feet… Check comma use throughout the section.	This section has been updated.
3.2.5.6 Fish Resources	p. 3-368	30-36		Throughout the Environmental Consequences section there does not seem to be a differentiation between existing and proposed crossings. The text implies that all crossings are going to be proposed new crossings.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-368	30	…tributary streams and as the …	…tributary streams as the …	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-368	34	…second crossing at Rock…	…second crossing on Rock…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-369	28-35	While no…SRB summer steelhead…This subspecies was…extirpated from all tributaries…the Hells Canyon Dam Complex.	Remove all discussion of Snake River Basin steelhead as it is not present.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-369 and 3-370	35-37 and 1	In order to …the analysis of effects…with the Proposed Action.	Revise sentence, the current wording is confusing to the reader.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-370/ Table 3-86	3		Make table consistent with Table 3-84 in terms of information presented. In addition, make sure quantities (number, acres) are what are actually presented based on the column headings. Remove all reference associated with Snake River Basin steelhead in Segment 3 as they are not present.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-370/ Table 3-86	4-5	* = potential habitat may be present.	Remove all reference associated with Snake River Basin steelhead in Segment 3 as they are not present.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-370	8	…road crossings on the …	…road crossings ~~on~~ associated with the…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-370	9	…in the analysis are for…	…in the analysis area for…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental	p. 3-370	10	…in the Proposed Action analysis area in…	…in the ~~Proposed Action~~ analysis area in…	This section has been updated.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
Consequences					
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-370	12	…Proposed Action analysis area.	… ~~Proposed Action~~ analysis area.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-370	17-18	None present.	As there are no federally listed and candidate species, then all reference should be removed from tables and discussion.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-371	6	…stream crossings at culverts.	As worded, this is confusing. Is this existing or proposed? Culverts as stream crossings?	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-371	9	…improvements to required access roads…	…improvements to ~~required~~ access roads…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-371	17-25		The species does not occur. Remove all discussion here and report none present.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-371	27	The redband trout occurs…	~~The r~~Redband trout occur…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-371 and 3-372	35-37 and 1-5		Remove all discussion as the species does not occur. Some of the information could be included in the cumulative effects analysis assuming there is a reasonable foreseeable action that would result in steelhead present upstream of the Hells Canyon Dam Complex.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-372	18, 20, and 22		Be consistent with how the text is summarized. Either use the text "in the analysis area of the Flagstaff Alternative" for lines 18 and 20, or remove "of the Flagstaff Alternative." Regardless of the approach this should be consistently done for all segments and alternatives.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-372	22	…or EFU is present…	…or EF~~H~~F is present…	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-373	13-16		This paragraph/sentence is confusing. Revise sentence and be consistent with previous wording.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-374/ Table 3-87			Make table consistent with Table 3-84.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-374	15	…would cross a ditch or canal at culverts.	This wording is confusing. Is this existing or proposed? Culverts would be used to cross?	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-376/ Table 3-88			Make table consistent with Table 3-84.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-377	11-12	No critical habitat or Essential Fish Habitat is present in the analysis area of the Proposed Action in Segment 5.	If acronyms CH and EFH are used, these references would need to be changed. Consider revising and be consistent regarding the phrasing of "the analysis area of the Proposed Action in Segment…" This could suggest to some readers the analysis area varies by Proposed Action versus alternatives, as well as by segment. Furthermore, the variation in scales complexes comparison of effects among segments and alternatives.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-377	16-17	The streams in the Malheur S Alternative analysis area…	Same comment as above. This could suggest to some readers the Malheur S analysis area differs from other analysis areas. Revise all wording and ensure it is consistent and comparable.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-378	28-29	…intermittent streams with drive through fords and 1 is along a perennial stream at a culvert.	Are these existing or proposed? The wording suggest existing, which further implies that they would just be used and there would be no new construction impacts. There needs to be a differentiation between existing and proposed and between construction and operation. Each have different types of impacts and intensity. Consider revising the Environmental Consequences overall approach to effects analysis to reflect these factors and their degree of potential affects to Fish Resources.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-378	31	No CH EFH….	Is this one or two acronyms at this point….While a reader may pick up on this being CH or EFH, by using acronyms inconsistently throughout the Fish Resources section, a reader could struggle with following the	This section has been updated.

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
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				impact determinations. Consider revising throughout and potentially spell out critical habitat and use EFH for Essential Fish Habitat. In this case an "or" is needed regardless. Ensure text throughout the alternatives discussion for each segment is consistent on what information is presented when and how.	
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-378 and 3-379	33-34 and 1-2	Direct and indirect…would be low…would be low…(several maintenance trips per year).	Why would there be any effects when there are no species present? Be consistent with analysis across segments based on intensity of impacts. This determination is the same as in Segment 1, yet there are no fish present here.	This section has been updated.
3.2.5.6 Fish Resources/ Environmental Consequences	p. 3-379	26	…non-sensitive species Indirect long-term…	…non-sensitive species. Indirect long-term…	This section has been updated.
3.2.5.7 Fish Resources/ Mitigation Planning	p. 3-380	12-33		No true technical review could be performed as specific mitigation plans have not been developed.	This section has been updated.
3.2.5.7 Fish Resources/ Mitigation Planning	p. 3-380	13-16	Appendix D…status aquatic species…Snake River Basin steelhead…salmon.	Review and revise for correct use of semicolon and commas.	This section has been updated.
Section 3.2.6 Land Use, Agriculture, Recreation, Transportation					
3.2.6.2 Land Use/Regulatory Framework	p. 3-381	24-26	The BLM land-use planning process (43 CFR 1610) combines Section 202 of the Federal Land Policy and Management Act (FLPMA) of 1976 and National Environmental Policy Act (NEPA) of 1973 regulations.	The preparation and amendment of BLM RMPs are subject to compliance with NEPA. *See* 43 C.F.R. § 1601.0–6. However, the BLM planning process does not "combine" FLPMA and NEPA processes. Revise this statement as follows: "The BLM land-use planning process (43 CFR 1610) ~~combines~~ is subject to Section 202 of the Federal Land Policy and Management Act (FLPMA) of 1976 and National Environmental Policy Act (NEPA) of 1973 regulations."	Revised
3.2.6.2 Land Use/Regulatory Framework	p. 3-382	38	….are addressed as reasonably foreseeable future actions under Cumulative Effects (Section 3.3)	Each preferred alternative set forth in the RMP amendment Draft EISs is not a final agency decision and is one alternative among many alternatives. Explain why the preferred alternative is considered a reasonably foreseeable future action with respect to the cumulative effects analysis and the remaining alternatives are not.	The B2H Project has not been included in the revised cumulative effects quantitative analysis as a reasonably foreseeable future action. The Final EIS has been revised to provide more detailed analysis related to cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. The effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.2.6.2 Land Use/Regulatory Framework	p. 3-383	26-27	….are addressed as reasonably foreseeable future actions under Cumulative Effects (Section 3.3)	Each preferred alternative set forth in the RMP amendment Draft EISs is not a final agency decision and is one alternative among many alternatives. Explain why the preferred alternative is considered a reasonably foreseeable future action with respect to the cumulative effects analysis and the remaining alternatives are not.	The B2H Project has not been included in the revised cumulative effects quantitative analysis as a reasonably foreseeable future action. The Final EIS has been revised to provide more detailed analysis related to cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. The effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.2.6.2 Land Use/Regulatory Framework	p. 3-387	27-29	Neither the Proposed Action nor any alternatives cross a BLM or USFS designated WSR. However, the Proposed Action and two alternatives cross a portion of the BLM Owyhee River Below the Dam ACEC where the river may be suitable as a WSR.	Suggest moving this text to fit into existing text on page 3-404.	Section has been revised and comment no longer applies.
3.2.6.2 Land Use/Regulatory Framework	p. 3-390	6-9	Per county codes and/or ordinances, Malheur, Umatilla, and Union Counties encourage the development of transmission lines on existing transmission line rights-of-way wherever possible. None of the counties within the analysis area have designated utility corridors.	Confirm Umatilla County has no designated utility corridors.	Text has been removed. Local utility corridors are not being considered in the analysis.
3.2.6.2 Land Use/Regulatory Framework	p. 3-393 p. 3-394	37-38 1	Although, the project analysis area includes 21.5 acres of the Umatilla Indian Reservation in Umatilla County, Oregon and will examine indirect impacts of the project on Confederated Tribes of the Umatilla Reservation (CTUIR) lands	Suggest changing sentence structure, the project analysis area doesn't "examine indirect impacts." Suggest rewording to "Although, the project analysis area includes 21.5 acres of the Umatilla Indian Reservation in Umatilla County, Oregon and indirect impacts of the project on CTUIR lands are examined in this section." CTUIR already has an acronym assigned on the previous page.	Text has been removed and acronyms have been revised.

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Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
3.2.6.2 Land Use/Regulatory Framework	p. 3-396	21	(Oregon DSL) are crossed…	Suggest taking out the parentheses to read "Oregon DSL lands are crossed…."	All uses of "Oregon DSL" are now just "Oregon DSL" not "(Oregon DSL)".
3.2.6.5 Land Use/Affected Environment	p. 3-397	18-19	*Baker County Zoning and Subdivision Ordinance #83-3* (Baker County 1984) and Land Use 18 Ordinances of 1983 (Baker County 2010)	Baker County now has a 2014 land use ordinance.	Reference updated
3.2.6.5 Land Use/Affected Environment	p. 3-402	9	Affected Environment Common to All Alternatives	Suggest deleting this header because the "Affected Environment – Land Use and Agriculture" is presented on the previous page (p. 3-401).	This section has been removed.
3.2.6.5 Land Use/Affected Environment	p. 3-402	14-16	Private lands are owned by individuals or groups and therefore fewer people receive the benefits (structure payments or right-of-way compensation) or consequences (inconvenience, damage, etc.) of a transmission line project.	Suggest deleting these sentences. The words "benefits" and "consequences" are subjective and the statements are inaccurate. The private land owners would receive structure payments, and the BLM would receive right-of-way compensation. The public land would also have "consequences (inconvenience, damage, etc.) with is a much larger number of people.	Text has been removed.
3.2.6.5 Land Use/Affected Environment	p. 3-402	16-18	Alternatives with more private land affect a higher number of people because parcel sizes tend to be smaller than on alternatives with more publicly managed lands. The effects are at a more personal and direct level.	The first sentence is not an accurate statement. 1) there are some very large private parcels that the proposed action crosses for many miles and 2) the public lands are available for the general public which is a much larger number of people than a handful of private land owners. The second sentence is a subjective statement. Many of the public consider actions on federal lands personal and direct.	Text has been removed.
3.2.6.5 Land Use/Affected Environment	p. 3-404	5-8	Wilderness and Wilderness Study Areas There are no wilderness areas…	Suggest deleting this paragraph. The first sentence is stated on p. 3-385 line 2. The second sentence is an effects statement and does not belong in the affected environment section.	Analysis of Wilderness and Wilderness Study Areas has been moved to the Potential Congressional Designations section of the Final EIS and reorganized. Text has been revised to match updated outlines.
3.2.6.5 Land Use/Affected Environment	p. 3-404	9-21	Wild and Scenic Rivers In 1968, Congress…	Suggest moving these two paragraphs to page 3-387 into the wild and scenic rivers regulatory framework section.	Analysis of Wild and Scenic Rivers has been moved to the Potential Congressional Designations section of the Final EIS and reorganized. Text has been revised to match updated outlines.
3.2.6.5 Land Use/Affected Environment	p. 3-405/ Table 3-91	Whole Table		Add acres into this table, so that the table includes both acres and percentages. The effects analysis tables are in acre (suggestion below to add percentages into the effects analysis tables). This would allow the reader to do an "apples to apples" comparison.	Tables have been revised according to new quantitative analysis and impact assessment.
3.2.6.5 Land Use/Affected Environment	p. 3-406/ Table 3-92	Whole Table		Add acres into this table, so that the table includes both acres and percentages. The effects analysis tables are in acre (suggestion below to add percentages into the effects analysis tables). This would allow the reader to do an "apples to apples" comparison.	Tables have been revised according to new quantitative analysis and impact assessment.
3.2.6.5 Land Use/Affected Environment	p. 3-407	1-5	Exclusive Farm Use (EFU) zoning is established…	Suggest deleting this paragraph since it is a repeat of information above (as stated). No need to repeat.	Text has been removed.
3.2.6.5 Land Use/Affected Environment	p. 3-407/ Table 3-93	Whole Table		Add acres into this table, so that the table includes both acres and percentages. The effects analysis tables are in acre (suggestion below to add percentages into the effects analysis tables). This would allow the reader to do an "apples to apples" comparison.	This table has been replaced in the Final EIS; in the Final EIS, a comparison of alternatives and variations occurs, rather than a comparison of counties.
3.2.6.5 Land Use/Affected Environment	p. 3-407	21-22	The standard wheel line is 1,320 feet long	Suggest deleting this sentence, it is stated above on line 19.	This section has been rewritten and is now included in the Types of Potential Effects.
3.2.6.5 Land Use/Affected Environment	p. 3-408/ Table 3-94	Whole Table		Add acres into this table, so that the table includes both acres and percentages. The effects analysis tables are in acre (suggestion below to add percentages into the effects analysis tables). This would allow the reader to do an "apples to apples" comparison.	This table has been replaced in the Final EIS; in the Final EIS, a comparison of alternatives and variations occurs, rather than a comparison of counties.
3.2.6.5 Land Use/Affected Environment	p. 3-409	17	Grazing also is a major land use activity on private land	Are there any numbers to support this statement? If so, please cite.	No data are available to support this statement. It has been revised to read: "Impacts on grazing on private land, other than where federally managed grazing allotments occur on private land and where land is zoned as Exclusive Range Use, are not disclosed in this EIS, as data is unavailable to identify where grazing is occurring."
3.2.6.5 Land Use/Affected Environment	p. 3-410/ Table 3-95	Whole Table		Add acres into this table, so that the table includes both acres and percentages. The effects analysis tables are in acre (suggestion below to add percentages into the effects analysis tables). This would allow the reader to do an "apples to apples" comparison.	This comment does not apply to this table since the table already contains acres.
3.2.6.5 Land Use/Affected Environment	p. 3-411/ Table 3-96	Whole Table		Add acres into this table, so that the table includes both acres and percentages. The effects analysis tables are in acre (suggestion below to add percentages into the effects analysis tables). This would allow the reader to do an "apples to apples" comparison.	This comment does not apply to this table since it is stating the number of applications by crop type. It is not disclosing acreages.
3.2.6.5 Land Use/Affected Environment	p. 3-414 to 3- 417		Lands with Wilderness Characteristics section	This section (3 pages) Lands with Wilderness Characteristics discussion about the citizen group contains a lot of unnecessary information for a NEPA analysis. The section could be summarized into	Information has been left in. Revised "sticksee."

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				a couple of paragraphs. If kept in, on p. 3-414, line 13: need to put a "**d**" on "sticksee."	
3.2.6.6 Land Use/Environmental Consequences	p. 3-420/ Table 3-100	Whole Table	Areas of very high or high intensity of impact where the project would create a direct long-term conflict with existing land uses Areas where the project would conflict physically with existing residential, commercial, industrial, military, or agricultural uses (i.e. displacement of homes, businesses, or center-picot irrigation agriculture fields) Areas where the project would conflict physically with any designated preservation use area, inventoried area with wilderness characteristics, and unroaded/ undeveloped areas in a manner that would reduce the size of the area such that it may not be able to be managed as such Areas where the project may require extensive efforts beyond standard construction practices to ensure public safety. Areas of moderate intensity of impact where the project would create an indirect conflict with residential, commercial, agriculture, or military uses. Areas where the project would indirectly affect any applicable adopted policy or management goal of the affected land-management agency. Areas where the project would conflict physically with unroaded/undeveloped areas in a manager that would not affect the ability of the area to be managed as lands with wilderness characteristics and/or wilderness Areas of low intensity of impact where land use is compatible with a transmission line. Areas in which the effects, while long-term, would not preclude use of the area for agricultural, grazing and resource development. Areas of measurable or perceptible change that is small enough that it would not result in a change to ecological condition, a loss of acres eligible to be managed as an unroaded/undeveloped area."	Suggested condensing and rewording the first two bullets in the description of "high" impacts to: "Areas where the Project would create a direct, long-term conflict with existing land uses such as residential, commercial, industrial, military, or agricultural uses (i.e. displacement of homes, businesses, or center-picot irrigation agriculture fields)." This third bullet contains the terms "preservation use area" and "unroaded/undeveloped areas" which were not used or defined in the affected environment section and are not discussed in the effects analysis. Suggest deleting this bullet (it is also applied on p.3-478 in the recreation criteria table). How does this fifth bullet apply to land use and agriculture? Seems more applicable to Section 3.2.12 Public Health and Safety. Suggest deleting this bulleted statement. The first bullet under moderate: Suggest rewording to "Areas where the project would create an indirect conflict with residential, commercial, **industrial**, agriculture, or military uses."This third bullet under moderate: How could the project indirectly affect policy? This either needs to be defined, or deleted. This fourth bullet contains the term "unroaded/undeveloped areas" which was not used or defined in the affected environment section and is not discussed in the effects analysis. Suggest deleting this bullet. This first bullet under low suggest rewording to: "Areas where land use is compatible with a transmission line." This second bullet under low: if the use of an area is not precluded, how could the effects be long- term? It seems like you are trying to say what you state under bullet three. This fifth bullet under low: why are we discussing ecological condition under land use? Also, the term "unroaded/undeveloped area" is not used or defined in the affected environment section and is not discussed in the effects analysis. Suggest deleting this bullet.	Table has been revised to more accurately portray criteria used for the revised quantitative analysis conducted for impact assessment. This table also was reviewed by the BLM.
3.2.6.6 Land Use/Environmental Consequences	p. 3-421	28	…have been identified at this point. Direct…	Suggest changing the word from "point" to "time."	Text has been removed based on other organization and structural changes in the document.
3.2.6.6 Land Use/Environmental Consequences	p. 3-421	30		What is the effect? Should the reader assume it would be "low" since effects are stated as "temporary, and would not physically displace any current land uses…."	Criteria and impact assessment methodology has been revised. Refer to Section 3.2.6.4 for details.
3.2.6.6 Land Use/Environmental Consequences	p. 3-421	32-33	…would require the removal of trees within the right-of-way and adjacent hazard trees…	Awkward sentence structure. Suggest rewording to "…would require the removal of trees within the right-of-way and hazard trees adjacent to the right-of-way…."	Revised
3.2.6.6 Land	p. 3-421	35		What is the effect (low, moderate, high)?	Criteria and impact assessment methodology has been revised. Effects

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Use/Environmental Consequences					on timber are described qualitatively, but are not analyzed as low, moderate, or high in the Final EIS analyses. Refer to Section 3.2.6.4 for details.
3.2.6.6 Land Use/Environmental Consequences	p. 3-422	1-3	Project construction would increase the potential for ignition in the proposed right-of-way corridor due to the operation of equipment capable of producing heat and sparks in the presence of wildland fuel.	Suggest changing the word "would" to "could." Suggest adding in a sentence or two after "hours" On line 8 to discuss how the requirements presented on lines 3-8 would decrease the potential for ignition. Also, suggest adding a discussion as to the advantage of the roads and right-of-way for fire breaks and fire suppression access in case of a range fire.	Text has been removed based on other organization and structural changes in the document. References to roads as potential fire breaks and that ignition risk would be decreased by design features have been added.
3.2.6.6 Land Use/Environmental Consequences	p. 3-422	12-13	The construction of access roads used for construction may increase available access during the construction period.	Suggest rewording for an easier to read sentence: "The construction of new access roads my increase access during the construction period."	Text has been removed based on other organization and structural changes in the document.
3.2.6.6 Land Use/Environmental Consequences	p. 3-422	35-36	…Section 3.2.8 (Cultural Resources) and sections dealing with the relevant resources (wildlife, vegetation, fisheries).	Suggest deleting the end of the sentence to read: ""…Section 3.2.8 (Cultural Resources)."	Text has been removed based on other organization and structural changes in the document.
3.2.6.6 Land Use/Environmental Consequences	p. 3-423	5-6	In currently cultivated farmland, direct effects could include destruction of existing crops due to project construction requiring untimely entry to fields during the active growing season.	This statement is inaccurate. The contractor would not have untimely entry without a right of entry agreement notification. The contractor, through this agreement, would be required to work with the landowner prior to entry.	Text has been revised to read "Construction effects on agriculture would consist primarily of temporary disruption of the current use during the construction period. Existing crops in cultivated farmland would be temporarily disturbed to enable construction of B2H Project facilities such as tensioning and pulling sites and access roads for construction equipment. Idaho Power Company would coordinate construction timing with affected landowners to minimize impacts on crop production."
3.2.6.6 Land Use/Environmental Consequences	p. 3-423	12	…would be the principal construction and operations impact…	Suggest deleting the words "and operations" since this discussion is under the Construction impacts heading.	This section has been reorganized and no longer includes subheadings Operations nor Construction.
3.2.6.6 Land Use/Environmental Consequences	p. 3-423	23-24	Grazing is a primary use of public and private lands in the B2H Project area, and is a major source of income for private landowners in the B2H Project area.	Section 3.2.11 Socioeconomics does not support this statement "major source of income." Provide data to back up the statement that "grazing is a primary use of public and private lands."	This section has been revised to read "Grazing occurs on public and private lands in the B2H Project area, and is a source of income for private landowners."
3.2.6.6 Land Use/Environmental Consequences	p. 3-423	30	…in this section. For acres affected during construction by alternative…	Suggest rewording to "…in this section. For acres of construction disturbance on BLM and USFS grazing allotments by county for each alternative…."	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-423	30-31	The socioeconomic impacts on grazing are discussed in Section 3.2.11.	The socioeconomic impacts of grazing are **not** discussed in Section 3.2.11. Remove this sentence.	This sentence has been deleted.
3.2.6.6 Land Use/Environmental Consequences	p. 3-424	2	Potential increased mortality of livestock from increased traffic.	This seems like a stretch. Is there current data on the rate of mortality of livestock due to traffic? If so, please cite. Most of the local traffic is likely from the folks who own the livestock. The transportation section does not indicate that there will be much of an increase in traffic.	This statement is based on professional and past project experience. However, it is discussed under Types of Potential Effects as being a low impact through use of design features such as posted speed limits for construction vehicles.
3.2.6.6 Land Use/Environmental Consequences	p. 3-424	9-10	The presence of construction workers could delay applications.	The applications be scheduled with construction crews to avoid conflict. Consider deleting this sentence.	This statement has been updated to read "The Applicant would coordinate the construction schedule with aerial applicators so as to avoid conflict."
3.2.6.6 Land Use/Environmental Consequences	p. 3-424	12	During operations, Idaho Power would have the right for ingress and egress necessary for operational purposes,	It should be added that Idaho Power would have these rights with an easement or authorization.	Text has been removed based on other organization and structural changes in the document.
3.2.6.6 Land Use/Environmental Consequences	p. 3-424	15	Other land use restrictions in the right-of-way…	This is the first mention of land use restrictions. Suggest rewording to "Other land use conflicts in the right-of-way…" to match the impact criteria wording.	Text has been removed based on other organization and structural changes in the document.
3.2.6.6 Land Use/Environmental Consequences	p. 3-424	21-27	Entire paragraph	Property value is not a land use issue. This paragraph belongs in Section 3.2.11 Socioeconomics.	Discussions of property values have been removed and references added to the Socioeconomics section.
3.2.6.6 Land Use/Environmental Consequences	p. 3-425	2	All tower heights would be less than 200 feet to avoid the need for aircraft obstruction lighting.	The FAA can still require markers or lighting on towers less than 200 feet, if within proximity of a military range or public airport and heliport.	Text has been revised as follows: "All tower heights would be less than 200 feet to minimize the need for aircraft obstruction lighting."
3.2.6.6 Land Use/Environmental Consequences	p. 3-425	7-10	Both authorized and unauthorized vehicular traffic on access roads used for the maintenance and operations of a new transmission line would increase the risk of wildland fire to some extent. Fires could spread to adjacent land used for timber management and could damage and remove existing timber.	Suggest changing "would" to "could" in the first sentence. These last two sentences in this paragraph should be moved down under the Fire Management heading.	Text changed to "may" increase. Additional text has been revised based on other text revisions.
3.2.6.6 Land Use/Environmental	p. 3-425	14-16	The transmission line could cause fires from downed power lines, birds or airplanes striking a line and	Birds may ignite when coming into contact simultaneously with separate electrified lines or with one electrified line and a grounded structure.	Discussion of birds has been deleted from the discussion. The Final EIS notes that "Activities related to construction and operation of the B2H

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Consequences			starting a fire upon hitting the ground, sparking at substations and transformers or, during smoky or humid conditions, electric arcs hitting the ground.	Each of the three phases of the B2H Project would be separated by 37 feet on the H-Frame structure and 42 feet on the Lattice Structure. No phase would be closer than 14 feet, 10 inches from the tower structures, and the phases would be insulated from the towers. Because the distance between the separate phases and between the phases and the tower structures would be far greater than any bird could span for a simultaneous contact, there is no risk that a bird could be ignited and cause a fire. The term "birds" should be deleted.	Project could result in accidental fire ignitions." This statement would include any accidental fire ignitions related to operation of the project.
3.2.6.6 Land Use/Environmental Consequences	p. 3-425	21	Firefighters will have to wait until the line can be de-energized to prevent injuries or fatalities from the electrical hazard.	Describe what the electrical hazards are.	Text has been revised to read "Fire suppression activities may be constrained for safety near the B2H Project, particularly aerial operations and certain types of ground operations where a potential electrical hazard (e.g., downed powerlines or other hazards) would exist."
3.2.6.6 Land Use/Environmental Consequences	p. 3-425	26	…low humidity, low-fuel moisture and high winds (BLM 2005).	The citation (BLM, 2005) refers to the BLM Land Use Planning Handbook in Chapter 6 References. Suggest updating the citation/reference.	This text has been removed based on other text revisions.
3.2.6.6 Land Use/Environmental Consequences	p. 3-425	28-29	Additionally, random and opportunistic vandalism has occurred on other transmission lines.	Provide citation (and reference in Chapter 6) for this statement, if it is plausible.	This text has been removed based on other text revisions. No citation added.
3.2.6.6 Land Use/Environmental Consequences	p. 3-425	32-34	Clearing trees and large brush… (Deanne et al. 1998).	This also needs to be addressed in the construction effects section.	Effects discussion is no longer organized by construction and operation effects. All effects are discussed in one location.
3.2.6.6 Land Use/Environmental Consequences	p. 3-426	11-13	Direct suppression using engines and hand crews may also become inappropriate where it exposes firefighters to an unacceptable level of risk during periods of high wind and smoke.	High wind and smoke is not caused by construction and/or operation of the Project. Suggest deleting this sentence.	Sentence deleted
3.2.6.6 Land Use/Environmental Consequences	p. 3-426	13-14	These limitation could have a cumulative effect where the right-of-way crosses areas of sensitive resources, such as where heavy equipment to construct a fire line is already limited.	Since the previous sentence does not apply and should be deleted, suggest deleting this sentence as well. If for some reason, this stays in the document, please move to the cumulative impact section.	This text has been removed based on other text revisions.
3.2.6.6 Land Use/Environmental Consequences	p. 3-426	19-21	Firefighter access to an area may be delayed if the transmission line is energized and poses a threat to firefighter safety. Firefighters will have to wait until the line can be de-energized to prevent injuries or fatalities from the electrical hazard.	Consider providing context for these statements to clarify that the discussed delays in firefighting activities relate to the circumstance with the transmission line is downed. Additionally, consider discussing the benefits that the transmission line access road system may provide firefighters with respect to providing access to areas for wildfire response and control. Proposed changes include: "Firefighter access to an area may be delayed if ~~the~~ a downed transmission line is energized and poses a threat to firefighter safety. Firefighters will have to wait until the line can be de-energized to prevent injuries or fatalities from the electrical hazard. Firefighter access to an area may be increased where the Project's road system provides new or improved access to the area. Firefighters have been known to use transmission line roads to access fire areas, particularly to fight wildfires."	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-426	23-25	Viewed in terms of agricultural operations in the potentially affected counties, the total estimated…	Suggest simplifying this long sentence by rewording to "The total estimated…." Also suggest deleting the words "and employment" off the end of the sentence since employment is an issue addressed in the socioeconomics section.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-427	13-14	Mechanical irrigation, automated farming methods, and farming equipment with large spans (up to 100 feet), are all affected by overhead conductors and support structures.	Further explanation of how these operations are affected by overhead conductors and support structures should be included with this statement.	Refer to Types of Potential Effects Existing Agriculture for updated effects on irrigated lands.
3.2.6.6 Land Use/Environmental Consequences	p. 3-428	14-15	Adverse effects on the ability…	Suggest rewording to: "Effects on the ability of aerial applicators to safely provide services would be increased cost, reduced efficiency, potential damage to crops from ground applications, and lower crop yields."	Revised
3.2.6.6 Land Use/Environmental Consequences	p. 3-430	10-11	The short-term direct and indirect construction effects on general land uses in the analysis area of the Proposed Action would be moderate, in that they would create an indirect conflict…	In Table 3-100, moderate effects are described as indirect. Suggest rewording to: "The short-term construction effects on general land uses in the analysis area of the Proposed Action would be moderate, in that they would create an indirect conflict…."	Criteria and impact assessment methodology has been revised. Refer to Section 3.2.6.4 for details.
3.2.6.6 Land	p. 3-430	13-14	...and would indirectly affect applicable adopted	Describe what you mean by "indirectly affect applicable adopted	Criteria and impact assessment methodology has been revised. Refer to

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Use/Environmental Consequences			policies and management goals of the affected land-management agencies.	policies and management goals." How are policies and management goals affected?	Section 3.2.6.4 for details.
3.2.6.6 Land Use/Environmental Consequences	Tables 3-101 to 3-121			Tables 3-101 through 3-121 need to be broken out by Segment, since the text discusses effects by Segment, it would help the reader to quickly find the information referred to in text.	Tables have been revised according to revised quantitative analysis and impact assessment.
3.2.6.6 Land Use/Environmental Consequences	p. 3-431, 3-432, 3-435, 3-436/ Tables 3-101, 3-102, 3-103, 3-104, 3-106, 3-107, 3-108, 3-109	Whole Tables		Add percent into these tables, so that the table includes both acres and percentages. The affected environment tables are in percent. This would allow the reader to do an "apples to apples" comparison.	Tables have been revised according to revised quantitative analysis and impact assessment.
3.2.6.6 Land Use/Environmental Consequences	p. 4-432	7-11	Entire paragraph	This paragraph is poorly written. For clarity, suggest rewording to: "The Proposed Action would disturb a total of 1,130 acres of all types of agricultural operations during the construction period, resulting in a temporary, moderate impact to agriculture.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-433	2-4	However, if it is assumed that part of the acreage listed as dryland farming and pasture/hay is assumed to be used for grazing, total construction effects to grazing could be as high as 2,700 acres.	If there are no numbers to support this (assuming) then a conclusion cannot be drawn with numbers. Suggest removing this sentence, or rewording it.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-433	4-5	…by the Proposed Action and alternatives would be short-term…	Delete "and alternatives" from sentence. The Table 3-105 does not show data on alternatives.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-433	14-15	Operations disturbances to uses on private properties by land ownership are provided for the Proposed Action in Table 3-106.	Table 3-106 shows more than just disturbance to private property. Suggest rewording to: "Acres of operations disturbance by land ownership are provided for the Proposed Action in Table 3- 106."	Tables have been revised according to revised quantitative analysis and impact assessment.
3.2.6.6 Land Use/Environmental Consequences	p. 3-433	16-17	Operations disturbances to uses on private properties by land use type are provided for the Proposed Action in Table 3-107.	Table 3-107 shows disturbance by land use type (not private property). Suggest rewording to: "Acres of operations disturbance by land use type are provided for the Proposed Action in Table 3- 107."	Tables have been revised according to revised quantitative analysis and impact assessment.
3.2.6.6 Land Use/Environmental Consequences	p. 3-433 and 3-434	22-26 and 1-13	<u>Designated Corridors and Existing Rights-of-Way</u>	This section should be moved to the affected environment section on p. 3-404 between lines 4 and 5; as there is no effects analysis discussed.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-434	19	…would need to be amended to allow for approval of the project.	Suggest adding in the following: "…would need to be amended to allow for approval of the project, as discussed in Section 3.4 Plan Amendments."	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-434	20-33	<u>Hard Trigger Herd Management Area</u>	HMAs are not introduced into the affected environment and need to be. Suggest pulling the following sentences from this section and putting them into the affected environment section for HMAs: "HMA's are maintained by the BLM in accordance with The Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195). HMA characteristics include rolling hills and sagebrush steppe. The approved management level for the Hard Trigger HMA is between 66 and 130 animals. The horses share the HMA with other wildlife, including deer, antelope, and upland game birds."	Revised
3.2.6.6 Land Use/Environmental Consequences	p. 3-434	23	Construction of the Proposed Action….	This is the operations effects section. Suggest putting a discussion of this HMA into the construction effects and deleting the word "construction" from this sentence.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-434	31-32	…direct and indirect construction and operation effects to wild horse herd management are anticipated to be low.	Table 3-100 does not describe low as "direct or indirect", suggest deleting these two words from this sentence. Also delete the word "construction" as this is the operations effects section.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-435/Tables 3-106 and 3- 107	Table Footnote		Both of these tables show a footnote [1] in the heading, but do not have a footnote at the bottom of the table.	Tables have been revised according to revised quantitative analysis and impact assessment.
3.2.6.6 Land Use/Environmental Consequences	p. 3-436	3-4	The Proposed Action would remove approximately…	Awkwardly worded sentence. Suggest rewording to: "The Proposed Action would remove approximately 45 acres of irrigated agriculture and approximately 100 acres of dryland farming from production during project operations."	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-436	9-10	…but would have a low overall effect on agricultural operations given the available agricultural lands in the project analysis area.	Does this mean because of the low percentage of agricultural lands? If so, please cite a table with the numbers.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-437	19-21	Fire management effects of the Proposed Action and the alternatives would be similar and are described under Effects Common to All	Consider that this statement implies that the Fire Management Design Features on page 3-428 lines 20- 25 would not be effective. It would also imply that the requirements presented on p. 3-422 lines 3-8 would do nothing to decrease the potential for ignition.	This section has been revised and this comment no longer applies.

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Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
				Consider re-analyzing and re-stating residual effects after the application of the Fire Management Design Features.	
3.2.6.6 Land Use/Environmental Consequences	p. 3-437	25-26	…are compared to the Proposed Action in order to illuminate the differences, including advantages and disadvantages of each alternative.	Illuminate is an interesting choice of words. This section does not discuss advantages and disadvantages. Suggest deleting the end of the sentence after Proposed Action: "…are compared to the Proposed Action."	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-438	12-13	…Longhorn Variation would cross state land and would extend onto land within the Naval Weapons System Training Facility Boardman, managed by the U.S. Navy.	See comment on Chapter 2; the right-of-way would not extend onto land within the Naval Weapons System Training Facility Boardman. The right-of-way would be immediately adjacent to the Naval Weapons System Training Facility Boardman, but not extend over the east boundary of the training facility.	This section and alternatives have been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-438	25-26	Construction of the Longhorn Alternative would disturb approximately 134 more acres of irrigated agriculture than the Proposed Action.	It would help (easier for reader) to reference the table with the numbers since there are 8 tables at the end of this section.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-438	32-34	….would be affected by the Longhorn Alternative by routing the transmission line from the Longhorn Substation south along the East side of Bombing Range Road near the eastern boarder of the NWSTF Boardman to its intersection with the Proposed Action.	This is effects section, no need to tell where the line will go. Suggest simplifying sentence to: ""….would be affected by the Longhorn Alternative."	This section has been revised and this comment no longer applies
3.2.6.6 Land Use/Environmental Consequences	p. 3-439	1-3	Entire paragraph	This paragraph needs to be moved to the affected environment section unless an effects statement is added.	This statement has been moved.
3.2.6.6 Land Use/Environmental Consequences	p. 3-439	4-5	The Longhorn Alternative and Longhorn Variation would affect less prime farmland than the Proposed Action.	Refer the reader to which table contains this information.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-439	31-32	…the Longhorn Variation would cross approximately 5.5 acres of lands managed by the U.S. Navy.	See comment on Chapter 2; the right-of-way would not extend onto land within the Naval Weapons System Training Facility Boardman. The right-of-way would be immediately adjacent to the Naval Weapons System Training Facility Boardman, but not extend over the east boundary of the training facility.	This section and alternatives have been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-440	6-18		It would help (easier for reader) to reference the tables with the numbers for these two paragraphs since there are 8 tables at the end of this section.	This section has been revised to include references to tables whenever data is discussed.
3.2.6.6 Land Use/Environmental Consequences	p. 3-441	3-32		It would help (easier for reader) to reference the tables with the numbers for these two paragraphs since there are 8 tables at the end of this section.	This section has been revised to include references to tables whenever data is discussed.
3.2.6.6 Land Use/Environmental Consequences	p. 3-441	15	…but would be moderate to significant to the landowners affected.	Suggest changing the word "significant" to "high." Table 3-100 does not define significant.	Tables have been revised according to new quantitative analysis and impact assessment.
3.2.6.6 Land Use/Environmental Consequences	p. 3-441	23	Construction of most of the alternatives…	Suggest changing the words "most of" to "the other two."	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-441	24		It would help (easier for reader) to reference the table with the appropriate numbers for this paragraph since there are 8 tables at the end of this section.	This section has been revised to include references to tables whenever data is discussed.
3.2.6.6 Land Use/Environmental Consequences	p. 3-441	28	Direct and indirect effects to agriculture…	The term moderate in Table 3-100 does not identify direct effects. Suggest rewording to: "Indirect effects to agriculture…."	Table has been updated to include direct effects.
3.2.6.6 Land Use/Environmental Consequences	p. 3-442	5-6	…for both short-term construction and long-term operations	The use of "short-term" and "long-term" here are unnecessary, as they are defined in the introduction to this Chapter. Suggest rewording sentence to: "for both construction and operations."	Revised
3.2.6.6 Land Use/Environmental Consequences	p. 3-442	7-12		Poorly worded paragraph. Suggest rewording to: "Effects to fire management from the Flagstaff and Burnt River alternatives would be similar to the effects from the Proposed Action. The effects to fire management from the Timber Canyon Alternative would be greater due to the larger areas of forest cover and the greater proximity of forested terrain."	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-442	12	…would be anticipated to have a moderate effect.	The definition of moderate in Table 3-100 does not mention fire management.	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.6 Land	p. 3-442	16-18	… (exclusion areas are designated wilderness areas	This does not belong in the effects section, but should be moved to the	This section has been revised and this comment no longer applies.

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Use/Environmental Consequences			and wild river segments of the WSR, avoidance areas include wilderness study areas (WSAs), ACECs, and scenic and recreation river segments of the WSR).	affected environment section on p. 3-384 on line 9.	
3.2.6.6 Land Use/Environmental Consequences	p. 3-442	20	…but would parallel existing 230-kV and 69-kV transmission line right-of-way.	State how many miles (and percentage of the alternative) would parallel and existing 230-kV and 69- kV transmission line right-of-way.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-443	1-12	Oregon Trail Area of Critical Environmental Concern	These two paragraphs should be moved to affected environment on p. 3-405 after line 3.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-443	20	Two alternatives…	Suggest inserting the word "The" at the beginning of the sentence: "The two alternatives…"	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-443	23-24	In addition, the Tub Mountain South…	Suggest changing to: "The Tub Mountain South Alternative and the Willow Creek Alternative would **affect** 47 fewer acres of State land **than the Proposed Action**.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-443	25	but would be moderate to significant to the landowners…	Suggest changing the word "significant" to "high." Table 3-100 does not define significant.	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.6 Land Use/Environmental Consequences	p. 3-445	1-9		It would help (easier for reader) to reference the table with the numbers for these two paragraphs since there are 8 tables at the end of this section.	This section has been revised to include references to tables whenever data is discussed.
3.2.6.6 Land Use/Environmental Consequences	p. 3-445	14	were described	Suggest changing to: "are described."	Revised
3.2.6.6 Land Use/Environmental Consequences	p. 3-445	20-22		Would the Tub Mountain South Alternative require an amendment(s) to federal land use plans to address the visual resources? If so, please add to this paragraph.	Plan amendments are discussed in Section 3.4. No change made.
3.2.6.6 Land Use/Environmental Consequences	p. 3-446	4	would be moderate to significant…	Suggest changing the word "significant" to "high." Table 3-100 does not define significant.	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.6 Land Use/Environmental Consequences	p. 3-446	12	but proportional among the….	I don't understand the term "proportional" here. Clarify.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-446	14-15	Direct and indirect effects to agricultural operations during construction of all of the alternative would be moderate.	Moderate is described in Table 3-100 as indirect effects. Delete the words "Direct and" at the beginning of the sentence.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-446	15	Direct effects would include the loss of existing agriculture.	Table 3-100 describes this type of direct effect as "high."	The criteria for assessing level of impacts on agriculture have been updated.
3.2.6.6 Land Use/Environmental Consequences	p. 3-446	23	were described	Suggest changing to: "are described."	Revised
3.2.6.6 Land Use/Environmental Consequences	p. 3-446	29	The existing PacifiCorp Summer Lake to Midpoint 500-kV transmission line forms the centerline for a 1,500-foot corridor….	This is confusing "the line forms the centerline." Do you mean that there is 750 feet on either side of the 500-kV line that forms the 1,500-foot corridor? Clarify.	Text clarified
3.2.6.6 Land Use/Environmental Consequences	p. 3-447	29-35	Wild and Scenic Rivers	Suggest moving the first four lines of this paragraph to the affected environment on page 3-387.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-447	36	…the Proposed Action and alternatives would impact the outstanding remarkable value of scenery.	Suggest adding "of the Owyhee River Below the Dam" at the end of this sentence.	This section has been revised and this comment no longer applies.
3.2.6.6 Land Use/Environmental Consequences	p. 3-448	3-7	The relevant and important values of the ACEC…though ….important migratory corridor for neotropical birds (BLM 2002).	Suggest moving this to the affected environment section on p. 3-405 after line 8.	This section has been revised and this comment no longer applies.
3.2.6.7 Land Use/Environmental Consequences	p. 3-464	2	The draft RMP	Capitalize "draft" for consistency throughout document.	This section has been revised and this comment no longer applies.
3.2.6.7 Land Use/ Recreation Regulatory Framework	p. 3-465	9	…of land and resource management plans (LRMPs).	Suggest changing to "…of LRMPs" since this already has an acronym.	Acronyms have been reviewed and updated.
3.2.6.7 Land Use/ Recreation Regulatory Framework	p. 3-467	28-31	The Proposed Action crosses 1.75 miles….	Suggest moving the entire paragraph to the environmental consequences section.	This section has been revised and this comment no longer applies.

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Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-472	2	The affected environment for recreation is described for the entire B2H Project analysis area.	Suggest rewording to: "The affected environment for recreation is described for the **recreation** analysis area."	Text revised to read "1-mile-wide study corridor".
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-472	17	Designated recreation and public-interest areas within the B2H Project analysis area…	Suggest rewording to: "Designated recreation and public-interest areas within the recreation analysis area…"	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-472	29-30	The Proposed Actin and analysis area cross the westernmost portion of the OHV area but should not directly affect its use.	Suggest moving this sentence to the environmental consequences section.	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-473	9	The B2H Project analysis area….	Suggest removing "B2H Project" from this sentence. This section pertains to the recreation analysis area.	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-473	27	Additional information on the B2H Project effects to…	Suggest removing "B2H Project" from this sentence. This section pertains to the recreation analysis area.	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-473	30	There are a number of scenic roads within the B2H Project analysis area.	Suggest removing "B2H Project" from this sentence. This section pertains to the recreation analysis area.	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-474	1	Table 3-122 lists scenic byways potential affected by Proposed Action and alternative crossings.	Suggest rewording to: "Table 3-122 lists scenic byways crossed by the Proposed Action and alternatives."	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-474/ Table 3-122	15th row of table	??	There are two question marks in the last column. Fill in with the closest MP.	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-474/ Table 3-122	Whole Table	N/A	It seems that if there is an "N/A" across the last four columns of a row, it should not need to be included in the table. Delete the rows that do not cross a scenic byway.	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-476	16-17	OHV use in itself has become a popular method for exploring public lands.	Suggest deleting the words "in itself" as they are superfluous. Also, please provide a citation/reference to substantiate this statement.	This section has been revised and this comment no longer applies.
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-478	17	All recreation uses in the B2H Project area are variable…	Suggest rewording to: "All recreation uses in the **analysis** area are variable…"	Revised
3.2.6.10 Land Use/ Recreation Affected Environment	p. 3-479	15	Effects to recreation are described for all alternatives over the entire B2H Project area.	Suggest rewording to: "Effects to recreation are described for all alternatives over the entire **analysis** area."	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-479	30-31	Because construction effects would be temporary and limited in a real extent, B2H project construction is anticipated to have moderate overall effects on recreational visitor experiences in the analysis area.	"temporary and limited" are used to describe a low impact in Table 3-123. Suggest changing impact to "low."	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-480	2	….in the immediate vicinity causing low to moderate effects.	"temporary" is used to describe a low impact in Table 3-123. Suggest changing impact to "low."	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-480	3-4	…are anticipated to be long-term.	Explain why they are expected to be long-term (suggest using descriptions in Table 3-123).	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ nvironmental Consequences – Recreation	p. 3-480	12	….appear to lie within the B2H Project analysis area.	Suggest rewording to "…appear to lie within the **recreation** analysis area."	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-480	15-16	…would be temporary and limited to the areas of construction activity, and would therefore be moderate.	"temporary" is used to describe a low impact in Table 3-123. Suggest changing impact to "low."	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-480	18-22	The construction of the B2H Project would create additional access routes, which may facilitate OHV use in areas currently designated as closed to OHVs or where OHV use is limited, and could therefore result in resource damage. In addition, where the route or new access road crosses trails not designated as open to OHV use, the project may lead	This is a management issue. If the area is closed to OHVs then it will remain closed to OHVs regardless if there are new access roads. Suggest moving both of these sentences.	This section has been revised and this comment no longer applies.

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			to unauthorized use of these trails by OHVs.		
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-480	25-26	Unauthorized OHV use is discussed in more detail under the Operations section below.	There is not an Operations section below that discusses this in more detail. Suggest deleting this sentence.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-480	31-32	Noise effects of project operations would be noticeable in the immediate vicinity of the right-of-way.	Suggest moving this sentence to the noise section (Section 3.2.12 Public Health and Safety).	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-480	33-35	The project would create additional access routes across areas currently closed to OHVs. In addition, where a right-of-way or new access road crosses…..	These two sentences are a repeat from above. Suggest deleting these two sentences.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-481	3-5	…and could result in indirect effects to vegetation (trampling, displacement), soil (compaction and displacement)…….and indirect impacts to wildlife (displacement).	These statements address other resources than recreation. Suggest rewording sentence to omit impact discussion of other resources.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-481	12-13	…and would be moderate but temporary during construction….	"temporary" is used to describe a low impact in Table 3-123. Suggest changing impact to "low."	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-481	15	The Proposed Action does not affect OHV closure areas on…	Suggest rewording to "The Proposed Action does not **cross** OHV closure areas on…"	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-481	17-18	…to OHV closed areas that may be difficult to police, and the potential for vegetation, wildlife and other resource effects due to unauthorized OHV access.	"Policing an area" is a management issue. If the area is closed to OHVs then it will remain closed to OHVs regardless if there are new access roads. Suggest deleting this sentence.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-481	17-18	…, and the potential for vegetation, wildlife and other resource effects due to unauthorized OHV access.	This statement addresses other resources than recreation. Suggest deleting sentence.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-481/ Table 3-124 p. 3-483/ Table 3-125 p. 3-484/ Table 3-126	Whole Tables		These tables have a lot of white space and do not provide the reader with useful information. Suggest summarizing this information.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-484	11-14	For the purposes of effects analysis….	Suggest deleting this first sentence, it is a repeat of the analysis area described on p. 3-468.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-484	15-17	Although federal ROS designations don't apply to state …and private lands….	Suggest moving this to p. 3-468 after line 15, where the analysis area is described.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-485	22-24	The Southeastern Oregon RMP (BLM 2002)…..in the current Baker RMP (BLM 1989).	Suggest deleting these two sentences, they are a repeat from page 3-463.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-486/ Table 3-128	Whole Table		This table has a lot of white space over 5 ½ pages, and does not provide the reader with useful information. Suggest summarizing this information.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-491/ Table 3-129	Whole Table		This table could be summarized into a more useful format. Perhaps by stating "The Proposed Action crosses 21.4 miles of roaded natural areas and 0.6 miles of primitive/semi-primitive areas designated in the Owyhee RMP."	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-492/ Table 3-130	Whole Table		This table could be summarized into a more useful format. Perhaps by stating "The Proposed Action crosses 21.4 miles of roaded natural areas and 0.6 miles of primitive/semi-primitive areas designated in the Wallowa-Whitman National Forest LRMP."	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental	p. 3-492	4-13	Entire paragraph	Suggest deleting this paragraph, it is a repeat of the analysis area described on p. 3-468.	This section has been revised and this comment no longer applies.

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Consequences – Recreation					
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-492	17-18	…would result in moderate effect to recreational resources…compared to low and temporary effects for the Proposed Action.	Describe why the effects are moderate and low.	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-492	21	…the Double Mountain Alternative would be primarily temporary and low in nature.	Remove the word "primarily" and describe why the effects are low.	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-495	6-7	…the direct effects on recreation….would be long term.	State what the effects are.	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-495	9 and 11	…effects of the B2H Project… Operations of the Proposed Action would….	One sentence refers to the project, the other sentence refers to the Proposed Action. This is confusing to the reader. Are "Effects common to all" supposed to talk about the project as a whole or just the Proposed Action?	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-495	13	…project operation effects may indicate that current ROS designations are inaccurate and suggest re-classification…	Suggest rewording to "project operation effects may require re-classification…" As stated, it gives the reader the impression that the current classification is incorrect.	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-495	14-16	These effects would be long-term and either high where the expectations of recreationists under current classifications cannot be met, or moderate where re-classification would be consistent with land management plans.	As stated, the "moderate" effect statement does not match up with the criteria listed in Table 3-123. Suggest changing to: "….or low where re-classification would be consistent with land management plans."	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-495	18	Direct B2H Project construction activity in the vicinity of scenic byways would be temporary and would therefore have moderate effects to the visitor's experience.	As stated, the "moderate" effect statement does not match up with the criteria listed in Table 3-123. Suggest changing to: "Construction activity in the vicinity of scenic byways would be temporary and would therefore have **low** effects to the visitor's experience."	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-495	26-27	The sound generated by the transmission line would be noticeable in the immediate vicinity of the transmission line right-of-way.	Quantify how sound generated by the line will be noticeable.	Clarifying text added
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-495	27	….the immediate vicinity of the transmission line right-of-way.	Suggest adding in some text at the end of the sentence: "….the immediate vicinity of the transmission line right-of-way, as discussed in Section 3.2.12 Public Health and Safety."	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-496	3	Generation of construction-related dust, would have temporary and therefore moderate effects….	As stated, the "moderate" effect statement does not match up with the criteria listed in Table 3-123. Suggest changing to: "generation of construction-related dust, would have temporary and therefore **low** effects…."	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-496	7	Long term effects of project operations would be low.	State why the effects would be low.	Criteria and impact assessment methodology has been updated and revised. Refer to Section 3.2.6.4 for more details.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-496	8	The nature of the effects of construction and operation of the B2H Project on dispersed….	Suggest rewording to: "The effects of construction and operation of the Project on dispersed…."	This section has been revised and this comment no longer applies.
3.2.6.11 Land Use/ Environmental Consequences – Recreation	p. 3-496	14-16	…of the Proposed Action would be moderate and long-term. The visual effects of the Proposed Action for the Timber Canyon Alternative are discussed in Section 3.2.7.	Suggest rewording for clarity to: "…of the Timber Canyon Alternative would be moderate and long- term. The visual effects of the Proposed Action and alternatives are discussed in Section 3.2.7."	This section has been revised and this comment no longer applies.
3.2.6.15 Land Use/ Transportation Affected Environment	p. 3-500	16-24	For effects to road systems… The analysis area for railroads…	These two paragraphs are a repeat of lines 26 to 34 on the previous page (3-499) and can be deleted.	The transportation section has been separated from the Draft EIS text in the land-use section into its own section and is no longer part of the land-use section. Refer to revised Transportation Section.
3.2.6.15 Land Use/ Transportation Affected Environment	p. 3-500	15	…and local roads: two-track roads; bridges; railroads, and airports.	Suggest adding in the word "pipelines" after "airports."	The transportation section has been separated from the Draft EIS text in the land-use section into its own section and is no longer part of the land-use section. Refer to revised transportation section of the Final EIS. Pipelines are not considered as a resource discussed in the transportation

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					section. Pipelines are now discussed in the existing land-use subsection of the land-use section.
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-505	13-14	Direct crossings of the existing transportation network by the B2H Project's Proposed Action or alternatives create the greatest potential for transportation impacts.	What kind of impacts? If a transmission line crosses a road/highway, how does that impact transportation? Table 3-137: Using the transmission route centerline to intersect with existing roads in GIS does not indicate impact.	Refer to revised transportation section, specifically the updated methodology section (3.2.9.4).
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-514	13	…be used during construction of the Proposed Action…	Project roads would also be used during operations and maintenance.	Text revised throughout document to indicate that roads would be used for construction, operation, and maintenance.
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-514	30-31	Direct impacts….include additional cut-and-fill along the roadway	Cut and fill are not impacts to transportation.	Text has been removed.
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-515	14-15	The localized direct and indirect effects of new road construction and road improvements for the Proposed Action would be high…	New road construction and road improvements would not be "high" (as defined on page 3-503 as "Areas of very high or high intensity of impact where the project would create a direct long-term conflict with existing transportation infrastructure"). There will be no direct, long-term conflict with existing transportation infrastructure. Following the intensity criteria on page 3-503, the effects would be "low" ("Areas where congestion or disruption of the use of transportation infrastructure would be short term and reversible").	Text revised to indicate that effects on transportation and roads would be low, short-term, and cease once construction is complete.
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-517	4-5	B2H Project construction, particularly the installation of structures and the stringing of conductors, could affect the ground-transportation system.	The installation of structures and stringing of conductors is completed by helicopter which will not affect the ground-transportation system. Suggest deleting this sentence, or state how it would affect the ground-transportation system.	Refer to revised transportation section of the Final EIS.
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-518	2-4	With implementation of an approved traffic and transportation management plan, traffic interruptions and road damage impacts would be moderate and short-term during construction of the proposed B2H project.	The impacts would not be moderate (as defined on page 3-503 as "Areas where the project would reduce the level of service (LOS) of a federal, state or county highway."). The previous page states that the Traffic and Transportation Management Plan would minimize traffic disruptions and delays, and that damage to roads and bridges would be repaired. Following the intensity criteria on page 3-503, the effects would be "low" ("Areas where congestion or disruption of the use of transportation infrastructure would be short term and reversible").	Refer to revised transportation section, specifically the updated methodology section (3.2.9.4).
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-518	23	…the project would comply with the transportation Environmental Management Plans.	What are "transportation Environmental Management Plans?" Does the writer mean the Environmental Protection Measures?	Text has been removed. Refer to revised transportation section of the Final EIS.
3.2.6.16 Land Use/ Transportation Environmental Consequences	p. 3-520	4-6	The traffic impacts of the Proposed Action and alternatives would be localized and short-term during the construction period and would therefore be moderate.	The impacts would not be moderate (as defined on page 3-503 as "Areas where the project would reduce the level of service (LOS) of a federal, state or county highway."). The Traffic and Transportation Management Plan would minimize traffic disruptions and delays as stated on page 3- 517, pages 27-28. Following the intensity criteria on page 3-503, the effects would be "low" ("Areas where congestion or disruption of the use of transportation infrastructure would be short term and reversible").	Refer to revised transportation section of the Final EIS, specifically the updated methodology section (3.2.9.4).
Section 3.2.7 Visual Resources					
3.2.7 Visual Resources	p. 3-523	7	Regulatory Framework	The narrative for the Vale District includes one sentence describing the context of the project in that planning area. Provide a similar narrative for other planning areas.	Revised
3.2.7 Visual Resources	p. 3-525, Table 3-144	1	Bureau of Land Management	Consider providing the acres that would be disturbed within the right-of-way instead of, or in addition to, the length in miles.	Comment noted; for simplicity, acres of disturbance have not been included at this time.
3.2.7 Visual Resources	p. 3-528	7-14	The John Day Basin Proposed RMP and Final EIS was completed March 2012 and covers the eastern 7 portion of the Prineville District (BLM 2012). The RMP planning area encompassed over 5 million acres and was previously being managed under three separate plans. The current RMP was completed in 1995, and this Proposed RMP incorporates new information and	Clarify these sentences as the two appear contradictory.	Text has been revised to clarify which planning areas are specifically being discussed in each sentence.

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			regulatory guidance as well as providing updated management direction to resolve land use issues or conflicts. One of the goals of the Proposed RMP is to protect the quality of scenic values and most of the planning area is classified as VRM Class II. However, the BLM–administered lands within the analysis area are proposed to be VRM Class III.		
3.2.7 Visual Resources	p. 3-528	11-14	In the absence of VRM class decisions in the prior RMPs for this area, BLM must assign interim VRM classes, and it can base these classes on the current Proposed Plan direction.	Clarify whether interim VRM classes were established for the Prineville District, John Day Basin. If interim classes were established, please cite documentation of this decision.	Text has been revised. Since the project does not cross this BLM field office, VRM classes are not relevant to the analysis.
3.2.7 Visual Resources	p. 3-528	21-26	The Grande Ronde and Powder Rivers were determined to be suitable through the Oregon Omnibus Bill and were designated by Congress into the Wild and Scenic River system in the late 1980's. Subsequently, a River Management Plan was developed for each river as per regulations with those plans being completed in 1993/1994, which appended the 1989 Baker RMP and includes the protection of high scenic values.	Clarify if the “Oregon Omnibus Bill” is the “Omnibus Oregon Wild and scenic Rivers Act of 1988.”	Yes, the reference to the “Oregon Omnibus Bill” should be a reference to the “Omnibus Oregon Wild and Scenic Rivers Act of 1988.” The text has been revised.
3.2.7 Visual Resources	p. 3-528	3-528	Public lands in Malheur County are administered by the Vale District of the BLM.	Clarify this statement. Are all public lands within Malheur County administered by the BLM, or are there lands administered by other federal agencies, too?	The text has been clarified.
3.2.7 Visual Resources	p. 3-532	13-18	For 12 of the 17 management areas, the landscape management prescription is to manage according to forest-wide standards and guidelines. The landscape direction for the other 5 management areas references VQOs, as applicable to specific areas. These specific areas are Management Area (MA) 4, Wilderness; MA 5, Phillips Lake Area; MA 6 Backcountry, MA 7 Wild and Scenic Rivers, and MA 8 Hells Canyon National Recreation Area Snake River Corridor.	Clarify if these areas are crossed by the proposed project ROW or analysis area. Specify exactly what MAs and management prescriptions are associated with the proposed routes or alternatives.	Revised
3.2.7 Visual Resources	p. 3-532	19-34	The Umatilla National Forest LRMP (USFS 1990b) documents forest management direction, and addresses visual resource management as a subset of recreation. Of the management areas within this LRMP, MAs A3 Viewshed 1 and A4 Viewshed 2 address the “seen area” from specific viewing platforms where forest visitors have a major concern for the scenic quality of the landscape.	Indicate what management areas are relevant to the project.	Revised
3.2.7 Visual Resources	p. 3-534	24	Oregon Energy Facility Siting Council	To be consistent with the descriptions provided for other managing authorities, please summarize the Council’s standard for scenic resources.	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-542	7-15	The inventory and analysis of the visual environment was completed regardless of jurisdiction or land ownership. The character of the existing visual resources in the analysis area varies because of the different natural and man-made features or elements in the landscape and the diverse patterns that these elements, when combined, create. Scenic or visual quality is the visual appeal of a landscape. The landscape is measured in terms of its distinctiveness (or memorability), scarcity, and variety of the landform, vegetation, water, color, adjacent scenery, and man-made features and how well these features fit together. The visual character and inherent scenic quality were evaluated using visual analysis units. Each unit has similar landforms, vegetation, land use, or man-made patterns and features, or contains water features such as rivers and lakes.	Summarize the scale of the LAUs so that the reader understands how project-related impacts were assessed within this context. If impacts to landscape character are only being reported for within the FG (i.e., within .5 miles of the project), please explain why. Include a discussion of why MG impacts to Landscape Character were not disclosed. What if the proposed right-of- way passes along the perimeter of the unit? Is landscape character altered for that whole unit based on that FG impact?	The text has been clarified to explain that landscape character impacts are only considered to occur within the footprint of the project.
3.2.7.4 Visual Resources	p. 3-542	16-17	In addition to establishing the existing visual	Clearly introduce the stationary and linear platforms. Consider: “In	The text has been clarified.

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/Methodology			character and scenic quality, identifying locations where people view the landscape was also important. The phrases 'sensitive viewing platforms' or 'key observation points' refer to public areas within the analysis area where the Proposed Action and alternatives could be visible. These platforms are typically roads or trails that people commonly travel, places they go for recreation, or where they live or work in addition to where views of special features are seen.	addition to establishing VAUs to evaluate existing landscape character and scenic quality, specific locations where people view the landscape were also identified. These locations were classified as stationary and linear viewing platforms. Stationary viewing platforms are defined as… Linear viewing platforms are described as…"	
3.2.7.4 Visual Resources /Methodology	p. 3-542	23-24	Conducting a visibility analysis to knowing where the Proposed Action and alternatives could be seen was also part of the visual resource inventory component of the analysis.	Change "knowing" to "know" or "better understand."	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-543	30-31	In addition, changes in the viewsheds from sensitive viewing locations were evaluated and characterized.	Clarify that this statement refers to stationary and linear platforms.	Revised
			The third step in the analysis of visual impacts was the determination of compliance of USFS and BLM's visual resource management objectives where the Proposed Action and alternatives would cross these federally administered lands	Specify USFS' management structure as "Visual Quality Objectives." Also specify where SIOs apply. Because SIOs are described in section 3.2.7.3, they are assumed to be germane to the analysis; however all relevant LRMPs appear to use VQOs.	The text has been revised to remove discussion of SMS.
3.2.7.4 Visual Resources /Methodology	p. 3-544	24-28	The descriptions are separated into landform and vegetation elements and include additional information regarding the general degree of enclosure, views, land use, ownership, cultural modifications, adjacent scenery, scarcity, VRI sensitivity level, and identified sensitive viewing platforms/KOPs. This information was compiled for review of the distinct elements and to provide for consistent evaluation of the landscape in the impact assessment process.	Clarify how VRI sensitivity is being used in the analysis. Include an explanation of how distance zones were used in this analysis. How were distance zones provided in Appendix B-7 calculated? The distance zones do not appear to have been generated using a viewshed analysis, and also do not take into account linear viewing platforms. For example, areas adjacent to I-84 are classified as "background" and "seldom seen."	The text has been clarified; VRI sensitivity levels are included only for informational purposes (and at the request of BLM; acreages provided in Draft EIS Appendix B-7 were generated based on visibility from the alternative alignments, and based on the foreground and middleground of the alternative alignments (this aligns with effects on scenic quality, and not to specific effects on viewers).
3.2.7.4 Visual Resources /Methodology	p. 3-553	3	The scenic quality of the analysis area for all lands regardless of jurisdiction/ownership was inventoried during the 2013 BLM VRI process	Clarify what the BLM 2013 VRI process was, and provide a citation. Explain clearly how these data are analyze in the DEIS. For example, "Data scenic quality data were used as a baseline to compare anticipate scenic quality following construction and operation of the proposed project and the alternatives. Where the project would cross VAU/SQRUs, the proposed project could alter rankings for scenic quality by reducing the assessed value for "cultural modification." Likewise, the value for "adjacent scenery" could be reduced for a VAU/SQRU where the project crossed an adjacent unit in a manner that detracted from that unit's contribution to this metric. The variety class assigned to VAUs located on USFS-administered lands could be reduced if the intactness of the landscape following construction and operation of the project was reduced."	The text has been clarified; additional text has been added to the effects analysis section to describe this portion of the analysis.
3.2.7.4 Visual Resources /Methodology	p. 3-553	33-34	The rationale for selection of the stationary viewing platforms are also provided in Table 3-150.	Consider rephrasing as follows: "~~The~~ Rationale for the selection of the stationary viewing platforms ~~are~~ is ~~also~~ provided in Table 3-150."	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-553	33-34	The rationale for selection of the stationary viewing platforms are also provided in Table 3-150.	Consider the site-specific KOP sensitivity level information set forth in the resource report, rather than assuming the sensitivity is high based on landscape analysis. Review rationale for selection for accuracy. For example, can you confirm that Platform 5-60 is a special designation area with high visitation, or does it represent a location within the ACEC and entrance to the access road to the visitor center? Does this location represent a stationary platform? Likewise, consider the extent to which stationary platforms listed are sufficient to analyze impacts to larger geographic areas, such as those represented by Wilderness Characteristics Units.	BLM did not agree with the assessment of sensitivity from each KOP. Only KOPs with high sensitivity were included in the analysis. Note that the KOP rationales from the Draft EIS have been simplified based on the analysis in the Final EIS being based on more qualitative analyses. Stationary platforms are not intended to analyze effects from larger geographic areas, but the effects on scenic quality are a general indicator of those typed of effects.
3.2.7.4 Visual Resources /Methodology	p. 3-553	33-34	The rationale for selection of the stationary viewing platforms are also provided in Table 3-150.	Clarify why not all Platforms Numbers shown on Figures contained in Appendix B.7 are not listed in Table 3-150.	This error has been corrected.
3.2.7.4 Visual Resources /Methodology	p. 3-553	33-34	The rationale for selection of the stationary viewing platforms are also provided in Table 3-150.	Clarify why not all viewer platforms summarized in Table 3-153 through Table 3-174, and Table 3-175 are contained in Table 3-150.	This error has been corrected.

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3.2.7.4 Visual Resources /Methodology	p. 3-553	33-34	The rationale for selection of the stationary viewing platforms are also provided in Table 3-150.	Specify in the "Rationale for Platform Selection" that the distance to project, viewer position, and relative degree of exposure corresponds to the proposed route. If it does not, please specific the alternative route that these metrics correspond to.	This information has been removed from the KOP rationale table, because it is unknown which alternative(s) they were referring to, and because the analysis techniques for the Final EIS are more qualitative in nature.
3.2.7.4 Visual Resources /Methodology	p. 3-553	34-35	In addition to the considerations noted above, the view characteristics from the platform of the project components can also be considered in the selection of the specific platforms.	Clarify if this sentence is referring to potential new views or new viewing opportunities that from the ROW, access roads, and/or other project components. This sentence reads as "can also be considered." Was this type of viewer platform actually considered in the analysis? If not, consider removing this sentence.	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-554	7-8	These routes are also identified as a stationary viewing platform because specific viewpoints on the route were considered sensitive.	Consider clarifying this sentence as follows: "Where appropriate, specific locations or viewpoints along linear viewing platforms were classified as stationary viewing platforms."	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-570	1	Special Management Areas	Clarify administering agency.	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-570	2	There are eight special management areas (SMAs) that could be indirectly impacted by the Proposed Action and alternatives (Appendix B.7, Mapbook 3).	Clarify what is meant by "indirectly impacted." The analysis presents direct impacts these areas, but no indirect impacts are specifically discussed.	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-570	17-18	Spatial Analyst to identify all areas that would be visible from the Proposed Action and each alternative for a distance of 5 miles on either side of the centerline of the transmission line alignment as well as the proposed access roads and substations.	Clarify that the transmission towers were included in this analysis and disclose assumptions regarding height and spacing of the towers.	Revised
3.2.7.4 Visual Resources /Methodology	p. 3-571-572	32-3	For this project-level analysis, the factors evaluated include visibility conditions, angle of view (relative viewer position and view orientation), duration of view (in time or distance), and scale and spatial relationship (degree of contrast) of the Proposed Action and alternatives in relation to sensitive viewing platforms (BLM 1986a).	***Global comment regarding use of environmental factor in the analysis:*** The definitions of environmental factors used in the analysis are well done, and it is especially helpful in a large-scale linear project such as this to have criteria to refer to. Consider comments below regarding use of these criteria in the analysis as constructive ways to better communicate how these factors – collectively – result in a specific impact determination.	Comment noted
3.2.7.4 Visual Resources /Methodology	p. 3-572	7-9	Visibility conditions refer to how the proposed project components would be viewed in the landscape from stationary or linear platforms, not whether the proposed project would be seen or not seen from the platforms.	***Global comment regarding use of environmental factor in the analysis:*** This definition accurately describes visibility conditions as the relationship between the project and the viewer. It is also correct that this metric does not indicate visibility of the project. When applied to the analysis of direct impacts in 3.2.7.6, however, it is consistently referred to as "high impacts to visibility conditions." Review the analysis and consider the analysis of this factor (or impact mechanisms) as one contribution to the overall impact determination.	Comment noted; effects analyses have been reconsidered, and environmental factors have been considered in a qualitative, rather that quantitative manner.
3.2.7.4 Visual Resources /Methodology	p. 3-572	9-17	These conditions are assessed by looking at the juxtaposition of the project components in the landscape. One condition is whether the project components would be seen predominantly skylined (silhouetted above the landforms) or whether they would be seen backdropped against landforms. The second condition is whether the views of project components would be predominantly unobstructed or partially obstructed. The third visibility condition is whether views of the project components would be predominantly continuous— that is, landforms or other features would be viewed over a distance— or if the views of the project components would be intermittent.	Consider splitting what is covered in this factor as: (1) Skylined vs Backdropped, and (2) obstructed / partially obstructed / continuous / intermittent to handle cases where the project would be backdropped, with continuous and unobstructed views.	Comment noted
3.2.7.4 Visual Resources /Methodology	p. 3-574	1-7	The duration of view—that is, how long, in time or distance, the project components would be seen from sensitive viewing platforms—is used to quantify the magnitude of potential impacts on the views from linear and stationary platforms. For linear platforms, the duration of view is calculated in terms of both time and distance as follows: (1) …, (2) …, and (3) percentage of the total miles of the project components that would be seen along the platform.	Clarify this metric. What is the denominator used to calculate the percentage of the total miles of the project components? Is this really the total miles of the proposed or segment, and if so, please clarify how this metric is relevant to the assessment?	Comment noted; effects analyses have been reconsidered, and environmental factors have been considered in a qualitative, rather that quantitative manner.
3.2.7.4 Visual Resources /Methodology	p. 3-574	30-33	It is also assumed that the communities within the analysis area would continue to develop in a manner similar to the existing land use patterns. However, the growth rate and ultimate land use patterns cannot be	Clarify if this is a statement regarding how RFFAs were handles in the cumulative impact analysis.	It is unclear what this statement was intending to explain; it has been deleted.

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			known, and future land use changes were not specifically considered in the evaluation of potential project impacts on the visual environment.		
3.2.7.4 Visual Resources /Methodology	p. 3-575	9-11	Table 3-152 defines the threshold of the visual resources impacts on the casual observers at the viewing platforms by each environmental factor and to the existing landscape's scenic quality and landscape character components. The magnitude of impact ranges from none to high for each factor.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Consider whether this table provides impact thresholds, or if it classifies environmental factors based on their contribution to the overall magnitude of impact. Consider recasting how these metrics are used to say "The contribution of visibility conditions and scale were both classified as high, resulting in a high impact to scenic quality from this viewing platform", as presenting each factor individually as an impact does not provide the collective result of all the factors at play. In thinking about this, consider situations such as linear viewing platforms where scale and visibility conditions were ranked as high, but duration was ranked as negligible. Would that result in a high impact to a linear viewing platform?	Comment noted; effects analyses have been reconsidered, and environmental factors have been considered in a qualitative, rather that quantitative manner. The thresholds table has been revised accordingly.
3.2.7.5 Visual Resources Affected Environment	p. 3-577/ Table 3-152	Entire Table	Table 3-152- Visibility Conditions	Visibility Conditions: See comment provides above. Consider splitting what is covered in this factor as: (1) Skylined vs Backdropped, and (2) obstructed / partially obstructed / continuous / intermittent to handle cases where the project would be backdropped, with continuous and unobstructed views.	Comment noted
3.2.7.5 Visual Resources/Affected Environment	p. 3-577/ Table 3-152	Entire Table	Table 3-152 - Duration of View (Linear Platforms)	Duration of View (Linear Platforms): See comment provides above. Define how "percentage of total miles of project components" was calculated and how this metric is used in the analysis. Consider further clarifying this metric to explain "would be seen." Does this refer to being seen at level of contrast classified in "scale / spatial relationship", or is it variable? Consider the threshold used for "negligible" as visibility of a project with strong contrast for 20% of the total miles of the linear platform could be considered more than a negligible contribution to overall impacts to that linear platform. Consider the denominator used in this analysis. Limiting the scope of the linear platform to that which is located within the analysis area could overstate the percentage of the linear platform that is affected. This could be true for those linear platforms that wind in and out of the analysis area (i.e., US Route 395/SR 74) and those that extend beyond the analysis area in their entirety (Hells Canyon Scenic Byway).	Comment noted; effects analyses have been reconsidered, and environmental factors have been considered in a qualitative, rather that quantitative manner. The thresholds table has been revised accordingly, and includes only low, moderate, and high thresholds for consistency with the other resources in the Final EIS.
3.2.7.5 Visual Resources Affected Environment	p. 3-577/ Table 3-152	Entire Table	Table 3-152 - Duration of View (Stationary Platforms)	See comment provides above. Define how "percentage of total miles of project components" was calculated and how this metric is used in the analysis.	Comment noted; effects analyses have been reconsidered, and environmental factors have been considered in a qualitative, rather that quantitative manner.
3.2.7.5 Visual Resources Affected Environment	p. 3-577/ Table 3-152	Entire Table	Table 3-152 – Scale and Spatial Dominance	Consider defining "visual contrast" and providing definitions for none/weak/moderate/strong in the text.	Revised
3.2.7.5 Visual Resources /Affected Environment	p. 3-577/ Table 3-152	Entire Table	Table 3-152	Consider developing summary impact criteria using the various combinations of threshold classifications. Consider adding a column that summarized anticipated impacts to stationary and linear viewing platforms.	Revised
3.2.7.5 Visual Resources/Affected Environment	p. 3-579	1	Affected Environment	Consider using this section to provide a narrative of the baseline data (i.e., VAUs) used in the analysis.	Comment noted; information regarding VAUs is currently located within the VAU table in Appendix H – Visual Resources Supporting Data.
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-585	34	…are assumed to part of the project design	Insert a "be" in between "to" and "part."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-587	6-8 11-12 14-17	Effects Common to All Alternatives	This section is intended to disclose impacts common to all action alternatives; however it is presented as a summary of project related actions. Consider the following examples: Line 6-8: "The Proposed Action and alternatives would also include temporary impacts such as tower construction, line stringing, equipment operation, equipment/material transport, construction-related dust, and material stockpiling. These impacts would attract attention within the analysis area, resulting in short-term impacts on visual resources."	This section and text has been removed.

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				Clarify by providing a summary of the impact mechanism associated with each of these actions (i.e., what would the change in scenic quality or character be that attracted attention?) Line 11-12: "Ground disturbing activities related to construction and access road development/improvement could result in permanent adverse impacts on visual resources." Clarify this sentence and provide a summary of the impact mechanism associated with construction and access road development/improvement – i.e., incremental increase of irregular lines that contrast strongly against the existing landscape? Line 14-17: "Transmission line replacement/re-stringing, potential transmission tower replacement, ongoing vegetative clearing within the right-of-way, and routine transmission line maintenance (and associated vehicular access) could attract attention within the analysis area from the Proposed Action and alternatives." Clarify this sentence and provide a summary of the impact mechanism associated with each of these actions.	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-587	18	Indirect Impacts to the Proposed Action	Correct this header. This section should discuss indirect impacts common to all action alternatives. There are no indirect impacts TO the proposed action. Consider simple "Indirect Impacts." For consistency, consider an analogous sub-header for "Direct Impacts" under Line 3.	This section and text has been removed.
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-587	18	Indirect Impacts to the Proposed Action	Clarify the impact mechanisms associated with indirect effects. As stated, potentially adverse impacts could result from increased access and use, which could result in proliferation of footpaths and OHV trails in areas located adjacent to the ROW. What would the expected impact to scenic quality or landscape character be? Is access to new viewing opportunities considered a beneficial; indirect effect? Does BLM take into account Idaho Power's intent to gate-off access roads where feasible?	This section and text has been removed.
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-587	26-27	Potential impacts eliminated from further analysis include visual effects from operation of Proposed Acton and the alternatives. Visual impacts would occur during construction and with the permanent, visible components of the Proposed Action and/or alternatives. Constructed project components that would be visible would incorporate mitigation measures to reduce visual impacts.	Consider how this statement could be misleading. The analysis focuses on visual effects from construction and operation of the Proposed action and Alternatives, and considers mitigation measures. None of these topics are eliminated from further analysis. Potential night sky impacts appear to be the only potential impact eliminated from further analysis. Consider focusing only on that unless there are other potential impacts the reader would expect to learn about, but that have been dismissed based on your assessment.	This section and text has been removed.
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-587	29-31	Idaho Power does not anticipate that structure lighting would be required because proposed structures would be less than 200 feet tall and would be located away from any airports that require structure lighting.	Cite relevant FAA regulation(s) (or circular) for avoidance lighting.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-588	6	A summary of the direct, residual impacts for each alternative route includes….	Rephrase to include the propose action: ""A summary of the direct, residual impacts for the proposed action and each alternative route includes…."	Revised
	Table 3-153 through Table 3-174; Table 3-175.			Define "NC" in table abbreviations.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-588	9-10	Direct impacts to the action alternatives, as well as the direct impacts related to the comparison of equivalent sections of the Proposed Action…	Rephrase to read "Direct impacts to visual resources resulting from the proposed action and alternatives are summarized below…" (i.e., there are no direct impacts to the action alternatives…"	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-588	11-14	As a reference, the definitions of the degree of impact to the change in scenic quality and landscape character are provided in Table 3-152, along with the definitions of the degree of impact to views from stationary and linear platforms and the Special Management Areas.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Consider that the definitions do not pertain to the degree of impact to the change in scenic quality, etc., but rather provide metrics to assess the degree of change in scenic resources, etc., and inform the impact determination.	Comment noted; environmental factors are being considered qualitatively, rather than quantitatively, for the Final EIS.
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-588	15	The Proposed Action is described overall and the alternatives are described by segments.	Revise to include reference to the impact analysis (i.e., it is not just the proposed action being described, it is the impact analysis). For example, "Potential impacts to visual resources resulting from t~~T~~he proposed action…"	Revised
3.2.6.7 Visual Resources	p. 3-588	23-25	Based on the large scale of the transmission line	Rephrase to "Based on the large scale of the transmission towers,	Revised

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/Environmental Consequences			towers, the existing landscape would predominately range from a moderate to high magnitude of change in scenic quality within the foreground of the Proposed Action alignment in this landscape, which includes…	potential impacts to the scenic quality of the existing landscape would be of moderate to high magnitude within the foreground of the proposed action….." (i.e., the existing landscape would not "predominantly range from moderate to high magnitude of change in scenic quality.")	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-588	32	Landscape Character	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Impacts to landscape character are provided as "Landscape Character FG Impact." While the scale of the structures and ROW clearing associated with the proposed action possibly would alter landscape character within .5 miles (FG) of the action; it is not clear from this analysis how that foreground impact manifests within attributes of landscape character assessed at the scale of a VAU. This is further complicated by the summary of middleground impacts to landscape character as "negligible t moderate, but…predominantly low" (Page 3-588, Line 31).	Comment noted; effects analyses have been reconsidered, and environmental factors have been considered in a qualitative, rather that quantitative manner.
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-588	33-35	The magnitude of change in landscape character associated with the project components would be high due to the dominant scale of the transmission line towers in comparison to the diverse landforms, sage steppe and forest vegetation, and clustered built features found in the existing landscape.	Review whether this statement is consistent with what is presented in Table 3-153. The table indicates that the proposed action would not result in a high magnitude of change in landscape character across all VAUs assessed under the proposed action.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	5-6; 13-15; 21-22; 33-34	People's views from nine of the stationary platforms would include predominantly skylined views of the project components, resulting in a high degree of impact to visibility conditions. People's views in the middleground from eight of the stationary platforms would include predominantly skylined views of the project components, resulting in a high degree of impact to visibility conditions. People's views of the project components would be predominantly skylined in the foreground from of the platforms, resulting in high impacts to visibility conditions. People's views of the project components would be predominantly skylined in the middleground from eight of the linear platforms, resulting in high impacts to visibility conditions.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Examples are provided below for the analysis of the proposed action; however this approach was used throughout the assessment of alternatives. Review the "Summary of Direct Impacts" for all action alternatives in the context of this global comment. Line 5-6: "High degree of impact to visibility conditions" Visibility conditions are defined as "how the proposed project components would be viewed in the landscape from stationary or linear platforms, not whether or not the proposed project would be seen or not seen from these platforms."(Page 3-572, line 7-9). Visibility conditions thus provide *one metric* to determine the overall impact to scenic quality or landscape character; however it does not correlate directly to an impact level. Consider recasting language stating "high degree of impact *to* visibility conditions" to the following: "Visibility conditions were ranked as high."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	7-10	People's views in the foreground at four of the stationary platforms would experience either wide degrees of exposure (more than 225 degrees).of project components or a lesser degree of exposure (45degrees or greater) in which the project is in direct view of the primary view of focus.	Remove period in middle of sentence ("…exposure (more than 225 degrees).of project components…). Place a space between "45" and "degrees." Clarify statement by replacing "…which the project is in direct view of the primary view of focus." with "…which the project is *contained within* the primary view of focus."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	9-12	Views from two stationary platforms (8-52 Lower Owyhee Interpretive Site; 12-17 Squaw Creek Canyon) would be subject to high impacts associated with the scale of the project components in the foreground because these components would visually dominate people's views from this platform.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. An example is provided below for the analysis of the proposed action; however this approach was used throughout the assessment of alternatives. Review the "Summary of Direct Impacts" for all action alternatives in the context of this global comment. Consider "Views from two stationary platforms (8-52 Lower Owyhee Interpretive Site; 12-17 Squaw Creek Canyon) would be subject to high impacts *resulting from* the scale of the project components in the foreground because these components would visually dominate people's views from this platform." In this context, "high impacts" would be an impact conclusion, and scale would be one of the impact mechanisms leading to that conclusion. Alternatively, consider the influence of "Angle of View": "Views from the Lower Owyhee Interpretive Site would be subject to moderate impacts to visual resources. Though the large scale of the project components	Revised

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				in the foreground could visually dominate people's views from this platform, viewer exposure would be classified as low."	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	1	Linear Viewing Platforms	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. An example is provided below for the analysis of the proposed action; however this approach was used throughout the assessment of alternatives. Review the "Summary of Direct Impacts" for all action alternatives in the context of this global comment. Clarify how "Miles of Project Seen from Linear Platform (%) is calculated, and how that metric describes impacts to linear viewing platforms. If the denominator used to calculated his percentage is restricted to only what is located within the analysis area (i.e., 5 mile buffer surrounding the centerline), this metric could overstate the percentage of the linear viewing platform (or byway, for example) impacted by the project.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	19-20	Impacts to people's views from the 22 linear platforms associated with the Proposed Action would vary from negligible to high.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. An example is provided below for the analysis of the proposed action; however this approach was used throughout the assessment of alternatives. Review the "Summary of Direct Impacts" for all action alternatives in the context of this global comment. There is no summary impact provided in Table 3-153. The table indicates impact mechanisms, but does not discuss how these impact mechanisms manifest in the context of existing conditions. Consider adding a column to place an impact determination based on the metric that were analyzed (i.e., visibility conditions, angle of view, miles of project seen from linear platform, miles of linear platform with views of the project, scale and spatial relationship) (Table 3-153).	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	22-24	People traveling along 14 of the linear platforms would also experience high impacts in the foreground related to predominantly head-on views of the project components.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. An example is provided below for the analysis of the proposed action; however this approach was used throughout the assessment of alternatives. Review the "Summary of Direct Impacts" for all action alternatives in the context of this global comment. Angle of view (i.e., "head on") describes an impact mechanism, not an impact. Consider the combined influence of all impact mechanisms on the overall impact determination. For example, a minor impact to visual resources could result in situations where the view is head-on, but the scale/spatial relationship is classified as "negligible."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	24-26	The amount of the project in the foreground that people would see from one of the linear platforms (Blue Mountain Scenic Byway) would result in a high impact, with more than 90 percent of project components being visible from the platforms.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. An example is provided below for the analysis of the proposed action; however this approach was used throughout the assessment of alternatives. Review the "Summary of Direct Impacts" for all action alternatives in the context of this global comment. Clarify this statement. What is meant by "90% of project components are visible in the foreground of this linear platform?"	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	26-30	People travelling along one of the linear platforms (State Highway 74) would also experience a high degree of impact in the middleground associated with the amount of view, with views of the project components for approximately 83 percent of the total time travelled for the platform within the analysis area for this alignment.	Replace "amount of view" with "duration of view" as sentence is referring to an impact mechanism that is temporal. See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	30-32	Nine of the linear platforms would experience high impacts associated with the scale of the project components in the foreground because these components would visually dominate people's views from these platforms.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Scale describes an impact mechanism, not an impact. Consider the combined influence of all impact mechanisms on the overall impact determination. Clarify whether scale alone would result in a high impact. What about	Revised

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				situations where viewer duration is low?	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	34-36	People traveling along ten of the linear platforms would also experience high impacts related to predominantly head-on views of the project components in the middleground.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Angle of View describes an impact mechanism, not an impact. Consider the combined influence of all impact mechanisms on the overall impact determination. Clarify whether head-on views of the project in the middleground alone would result in high impacts.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-589	36-37	The amount of the project that people would see from twelve of the linear platforms would be highly impacted, with 80-92 percent of project components being visible from the platforms.	Clarify this sentence. The "amount of project that people see" would not be impacted; the scenic quality or landscape character would be impacted. What constitutes "80-92 percent of project components?" Is this referring to 80-92% of the linear project containing middleground views of the project?	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-590	1-4	People travelling along six of the linear platforms would experience a high degree of impact in the middleground because they would be exposed to views of the project components for approximately 81-100 percent of the total time travelled for the platform within the analysis area for this alignment.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. It is stated on page 3-588, Line 30-31 that middleground impacts to scenic quality are negligible to moderate, but…predominantly low." Viewer exposure or viewer duration appears to be viewshed based, but does not consider that impacts may not be uniform across the linear platform. Consider the denominator use in this analysis as it may overstate impacts by being limited to portions of the linear platform located within the analysis area. Consider whether the numerator assigns high value for scale / spatial relationship to the entire area "exposed to views." The write up for Scenic and Back Country Byways does an excellent job of providing the context of the impact (see Page 3-726, Line 22-27).	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-590	2-4	. . . because they would be exposed to views of the project components for approximately 81-100 percent of the total time travelled for the platform within the analysis area for this alignment.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. This percentage value overestimate the length of the linear viewer platform exposed to views of the project, as any portion of the viewer platform outside of the analysis area was excluded from the analysis. By not including the entire length of the linear viewer platform (i.e., scenic byway), the denominator is reduced and the overall percentage of affected area is overstated.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-590	5	Special Management Areas	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 regarding analysis of SMAs. An example is provided below for the Morrow-Umatilla Segment; however this approach was used throughout the assessment of alternatives. Review the "Summary of Direct Impacts" for all action alternatives in the context of this global comment. Consider whether the analysis represents an impact to the SMA as a whole. Conclusions presented in this section correspond to a specific viewer platform within the SMA; however, the analysis should consider the collective results of the analysis of several KOPs throughout the SMA.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-590	6	Owyhee River Below the Dam ACEC	In maps presented in Appendix B.7, Segments 4 and 5 and Segments 5 and 6, please distinguish what polygons correspond to the "Owyhee River Below the Dam ACEC" and the "Owyhee ACEC."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-597	Entire Segment 1 Section	Entire Segment 1 Section	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 in this segment.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-597	8-10	In the Willow 8 Creek (BA-002) and Longhorn (BA-003) VAUs, there would be a high magnitude of change in scenic quality because of the dominance of the project components within the landscape.	Clarify rationale for the determination of a high magnitude of change in BA-003 as this landscape is understood to contain existing large-scale energy-related infrastructure. Without baseline data provided for this unit, it is assumed that data collected at KOPs and presented in Appendix 1A of Resource Report 1 for this project is applicable. BA – 002: KOP 2-1 and 2-11 describes views of the surrounding landscape as "dominated by cropland, pastures, wind 11 energy developments, and transmission lines." KOP 2-2 describes a more naturally appearing landscape, with the numerous wind energy	Revised

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				structures as the most distracting man-made elements. BA – 003: Although documentation for KOP 2-15 and 2-16 describe a landscape with many naturally appearing elements, KOPs 2-10, 2-17, and 2-18 describe the existing landscape as "dominated by man- made structures, including several tall transmission structures and the prominent form of the Boardman Generating Plant", containing …" numerous man-made structures; most notable are the tall, regularly repeating transmission structures that parallel Bombing Range Road…"that are " numerous and…skylined…"	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-597	15-18	The magnitude of change in landscape character associated with the project components would be high due to the dominant scale of the transmission line towers in comparison to the flat to rolling landforms, low sage steppe and agricultural vegetation, and limited amount of built features found in the existing landscape.	See above. Clarify the high magnitude of change in landscape character as KOP data provided in Appendix 1A of Resource Report 1 for this project indicate a landscape that is currently influenced by large-scale energy related infrastructure such as transmission lines, the Boardman Generating plant, wind turbines, and roads.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-597	22-24	People's views from one of the platforms (2-10 Northern Terminus - Boardman Generating Plant) would be predominantly skylined in the foreground, resulting in a high degree of impact with respect to visibility conditions.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Clarify how impacts to visual resources are considered high at the Northern Terminus-Boardman Generating Plant Viewer platform (KOP 2-10). It is stated that there would be a high degree of impact with respect to visibility conditions; however, this metric is considered by this reviewer as an impact mechanism, not an impact. Further, Appendix 1A of Resource Report 1 for this project describes existing conditions at KOP-10 as follows: "While the landscape has many naturally appearing elements, it is dominated by man-made structures, *including several tall transmission structures and the prominent form of the Boardman Generating Plant. These prominent industrial structures focus the attention of potential viewers to the east toward the plant, and detract from the scenic quality of the landscape*. Overall, there is little variety and few interesting features in the natural landscape surrounding KOP 2-10."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-597	26-27	Impacts in the middleground of the five affected stationary platforms would range from negligible to high.	Clarify impacts to viewing platforms 2-10 as Appendix 1A of Resource Report 1 for this project describes existing conditions as influenced by large-scale energy related infrastructure such as transmission lines, the Boardman Generating plant, wind turbines, and roads.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-597	35-36	People traveling along the Oregon National Historic Trail would also experience high impacts related to predominantly head-on views of the project components.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Clarify whether head-on views of the project in the foreground alone would result in high impacts to visual resources.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-598	1-3	One linear platform (Blue Mountain Scenic Byway) would also experience high impacts related to the amount of project components visible—with 90 percent of the project components visible within the foreground.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Clarify what is meant by "90% of project components visible within the foreground."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-598	10-12	From the Oregon National Historic Trail, the amount of the project that people would see in the middleground would be high, including views of 88 percent of the surrounding project components.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572. Clarify. Is this statement intended to convey hat project components would be visible from 88% of the total miles of this linear platform within the analysis area? Clarify denominator used to determine this value.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-599	1-33		See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-598	21-22	The Longhorn Alternative would lower the scenic quality in one (Longhorn BA-003) out of the five VAUs because of the dominance of the project components.	While the introduction of a new large-scale transmission line possibly would reduce scenic quality within .5 mile of the structure, please clarify the implications of this impact on a VAU currently characterized by the presence of large scale energy-related infrastructure (see comment	Revised

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	p. 3-600	5-6	The Longhorn Variation would lower the scenic quality in one (Longhorn BA-003) out of the five VAUs because of the dominance of the project components.	above for Longhorn Alternate, and reference to data presented in Appendix 1A of Resource Report 1.	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-598	29-31	The magnitude of change in landscape character that would be created by the Longhorn Alternative would be high due to the dominant scale of the transmission line towers in comparison to the flat to rolling landforms, low sage steppe and agricultural vegetation, and limited amount of built features found in the existing landscape in the Longhorn (BA-003) VAU.	As stated above, please clarify rationale for the determination of a high magnitude of change in BA- 003, as this landscape is understood to contain existing large-scale energy-related infrastructure.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-599 p. 3-601	30-31 20	Approximately 80-100 percent of these platform platforms… Approximately 92-100 percent of these platform platforms…"	Delete repeat "platform."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-600			See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-600	13-16	The magnitude of change in landscape character associated with the project components would be high due to the dominant scale of the transmission line towers in comparison to the flat to rolling landforms, low sage steppe and agricultural vegetation, and limited amount of built features found in the existing landscape.	This sentence incorrectly characterizes the amount of built features around the Longhorn Variation as "limited." There are numerous transmission and utility lines in the area, including the UEC 115-kV line, BPA 69-kV line, UEC substation, UEC 12.5kv distribution line, and BPA 69-kV line. Clarify that there are more than merely a "minimal" amount of built features.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-601	21-23	The project components would also be seen 82 percent of the total travel time on one of the linear platforms (Oregon National Historic Trail) within the analysis area, resulting in a high magnitude of impact for this platform.	Clarify the denominator used in this analysis.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-601	28-30	The following information provides a succinct summary of potential impacts for the section of the Proposed Action compared to Horn Butte Alternative/Longhorn Alternative/Longhorn Variation. The information is organized based on the general headings provided in Table 3-157.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 applicable to Comparison of the Alternatives to the equivalent section of the proposed action. Specific what portion of the proposed project was considered in the comparison.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-602	16-17	In comparison to the Horn Butte Alternate, the Proposed Action would have approximately 8 percent more moderately impacted acres.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 applicable to Comparison of the Alternatives to the equivalent section of the proposed action. This number appears to be the difference in "% of Project Visible in VAU." Clarify how "visible" defined and how this percentage calculated.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-604	27-31	The Proposed Action would have more moderate impacts with regard to all of the factors of viewer sensitivity, including visibility conditions, angles of observation, magnitude of project components visible, magnitude of platform affected, magnitude of duration of view and perceived scale as compared to the Longhorn Alternative.	How were potential impacts to viewer sensitivity measured? This is the first time that metric has been introduced to the analysis.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-611	Entire Segment 2 Section	Entire Segment 2 Section	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 in this segment.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-611	6-9	Based on the large scale of the transmission line towers and the associated removal of patchy spruce and fir forest vegetation within the ROW, the magnitude of impact on the scenic quality would be high in the Blue Mountain Forest (BA-011) VAU and moderate in the Grand Ronde River (BA-8 018) VAU.	Confirm that the right-of-way for the Glass Hill Alternative passes within .5 miles (foreground) of BA- 018.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-611	16-18	The magnitude of change in landscape character that would be associated with the Glass Hill Alternative project components would range from negligible to none because there would be no perceived change in the landscape character.	Confirm this conclusion based on the moderate FG impact indicated for scenic quality (i.e., landscape character impacts are provided for the foreground in Table 3-158).	Revised

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3.2.7.6 Visual Resources /Environmental Consequences	p. 3-617	Entire Segment 3 Section	Entire Segment 3 Section	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 in this segment.	Revised
				See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 regarding impacts to Landscape Character. Impacts to landscape character are provided as "Landscape Character FG Impact." It is clear that the scale of the structures and ROW clearing associated with the proposed action could alter landscape character within .5 miles (FG) of the action; however it is not clear from this analysis how that foreground impact manifests within attributes of landscape character assessed at the scale of a VAU. This is further complicated by the summary of middleground impacts to landscape character as negligible or low.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-617	6-9	Based on the large scale of the transmission line towers, the existing landscape would experience a predominantly high magnitude of change in scenic quality within the foreground of the Flagstaff Alternative alignment in this flat to rolling landscape in the Blue and Wallowa Foothills (BA-8 014), Baker Valley (BA-015), and Sutton Creek (BA 024) VAUs.	The map provided in Appendix B.7 (Supporting data for Visual Resources [Part 2], Segment 3, Flagstaff Alternative, Map 1 of 1) indicates the Blue and Wallowa Foothills (BA-8 014), Baker Valley (BA-015), and Sutton Creek (BA 024) VAUs are bisected by I-84; however there is no mention of this feature in the discussion "cultural modification" for these units. Expand description of scenic quality provided in Appendix B.7 to include this feature.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-620	30-33	People's views from a portion of the Powder River ACEC would include predominantly skylined views of the project components in the middleground, resulting in a high impact to this SMA. The Powder River ACEC would also experience high impacts related to the high amount of project components visible (97 percent).	<u>Powder River ACEC</u> Clarify whether the Powder River ACEC coincides with BA-016. Clarify the statement that 97% of project components would be visible, as scale and spatial relationship are ranked as LOW for the middleground, meaning that project components would either repeat elements/patterns common in the landscape, or would not be visually evident.	Revised
33.2.7.6 Visual Resources /Environmental Consequences	p. 3-621	2-3	The equivalent section of the Proposed Action would have 9 percent more highly impacted acres than the Flagstaff Alternative. The Proposed Action would also have more than 40,000 moderately impacted acres, as compared to no moderately impacted acres for the Flagstaff Alternative.	Clarify what the calculation of acreage was based on.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-621	6-7	The Flagstaff Alternative would have almost 2 percent more highly impacted acreage than the Proposed Action. Neither alignment would have moderate impacts to landscape character.	Clarify what the calculation of acreage was based on.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-621	19-22	The Proposed Action would have more high impacts with regard to all of the factors of viewer sensitivity, including visibility conditions, angles of observation, magnitude of project components visible, magnitude of platform affected, magnitude of duration of view and perceived scale than the Flagstaff Alternative.	Clarify use of the word "*visual sensitivity."* There is no mention in the document of the impact mechanisms being considered factors of viewer sensitivity. See global comment on Line X. Consider clarifying statement by using a summary impact, supported by ranking of impact mechanisms. Consider "The Proposed Action would ~~have~~ *result in* more high *magnitude* impacts *to linear platforms* ~~with regard to all of the factors of viewer sensitivity, including~~ *due to the collective influence of* visibility conditions, angles of observation, ~~magnitude~~ *visibility* of project components ~~visible~~, ~~magnitude~~ *percentage* of platform affected, ~~magnitude of~~ duration of view and perceived scale *of the project* ~~than~~ compared to the Flagstaff Alternative.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-622	8-9	There would be no impacts to people's views from Burnt River VRM II Area (5-81) because the Burnt River Mountain Alternative would not be visible from this location.	Verify this statement, as the Burnt River Mountain Alternative crosses VRM II area. If scenic quality in the foreground of the project is considered a high magnitude impact (as described on Page 3-621, line 33), then we would expect a commensurate impact to VRM II.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-622	35-36	It is anticipated that 100 percent of travelers along this portion of Manning Creek Road would experience views of the project in the middleground.	This metric has not been used before. Is there a distinction regarding the percent of travelers who would detect an impact?	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-641	Entire Segment 4 Section	Entire Segment 4 Section	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 in this segment. Note – specific examples will not be provided any further.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-641	Entire Segment 4 Section	Entire Segment 4 Section	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 regarding impacts to Landscape Character. Impacts to landscape character are provided as	Revised

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
				"Landscape Character FG Impact." The scale of the structures and ROW clearing associated with the proposed action possibly would alter landscape character within .5 miles (FG) of the action; however it is not clear from this analysis how that foreground impact manifests within attributes of landscape character assessed at the scale of a VAU. This is further complicated by the summary of middleground impacts to landscape character as negligible or low.	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-657	Entire Segment 5 Section	Entire Segment 5 Section	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 in this segment. Note – specific examples will not be provided.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-657	Entire Segment 5 Section	Entire Segment 5 Section	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 regarding impacts to Landscape Character. Impacts to landscape character are provided as "Landscape Character FG Impact." The scale of the structures and ROW clearing associated with the proposed action possibly would alter landscape character within .5 miles (FG) of the action; however it is not clear from this analysis how that foreground impact manifests within attributes of landscape character assessed at the scale of a VAU. This is further complicated by the summary of middleground impacts to landscape character as negligible or low.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-677	8-13	The magnitude of change to landscape character and scenic quality as well as the magnitude of the effects to views from sensitive viewing platforms are defined in Table 3-152. Information contained in Table 3-175 indicates for example, that there would be approximately 183,000 acres associated with the Proposed Action for which the magnitude of impact to scenic quality would be high (i.e., where the landscape would appear to be severely altered in the foreground); …	It is not clear how this analysis was completed. Clarify that the "Acres Visible within the Analysis Area" presented in Table 3-176 correspond to the "% of project Visible in VAU" presented in Table 3- 153 (and corresponding tables for Alternatives). Is this based on the bare ground viewshed model?	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-677	17-22	Similarly, for each of the environmental factors identified in Table 3-175, the miles of the alternative for each of the levels of impact are summarized. These impacts are summarized for stationary and linear platforms, as well as the Special Management Areas—and are provided to quantify the level impact for comparison. For example, in the foreground there would be 20 miles of the Proposed Action that would be considered a high impact to visibility conditions from the Special Management Areas; approximately 10 miles from sensitive stationary platforms; and 165 miles from sensitive linear platforms.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 applicable to this segment. Referring to these impact mechanisms as environmental factors is clear; however it not clear how there can be an impact *to environmental factors* (i.e., high impact t visibility conditions). Clarify how the "miles of the alternative for each of the levels of impacts" was calculated. How were miles assigned? Explain how presenting this metric for all environmental factors analyzed informs the analysis. For example, viewing conditions were classified as high for 165 miles of sensitive linear platforms ; however that does not tell us anything about when such viewing conditions were experienced in combination at a negligible to low viewer duration (e.g. Goodale's Cutoff Study Trail or Blue Mountain Scenic Byway).	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-677	31-33	Impacts are calculated based on the acreage in each VAU that would have views of the project, and are further separated by those that would result in a numerical rating change and those that would result in both a numerical change and a change in classification.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 applicable to Tables 3-176-3-197. Clarify what this calculation is based on. Is it based on the viewshed model? In the Summary of Direct Impacts, the scenic quality in the MG is consistently described as "predominantly negligible" (Subtle change / Proposed project would not attract attention). How has this determination been considered in the assessment of post-project scenic quality classifications presented in Table 3-176?	Revised
	Table 3-176 - Table 3-197		**T**able 3-176 – 3-197. Scenic Quality Impacts by Visual Analysis Unit	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 applicable to this section - Describe what the consequences are of shifting VRI values. What do those changes mean in terms of the overall distribution of VRI values within the planning area?	Revised
3.2.7.6 Visual Resources /Environmental	p. 3-706	5-7	Based on the respective VRM class, stated management objectives were compared to the	Consider clarifying this statement to read: "Potential impacts to visual resources that could result from the Proposed Action or alternatives	Revised

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
Consequences			Proposed Action and alternatives regarding magnitude of change in visual character and scenic quality, viewer sensitivity, and visual contrast with and dominance in the existing landscape.	were evaluated for compliance with stated management objectives of applicable VRM classes. The allowable level of visual contrast of a proposed project within each VRM class is …" Clarify how sensitivity factors into the conformance determination.	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-706	11	BLM Manual 8431-1 (BLM 1986) was used to evaluate the visual contrast created between the Proposed Action and alternatives and the existing landscape for those sensitive viewing platforms, referred to in the manual as key observation points (KOPs), that were identified to assess potential visual resource impacts to BLM-administered lands.	Pleas clarify to read "Methods in BLM Manual 8431-1 (BLM 1986) were used to evaluate…"	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-706	14-23	The degree to which a management activity affects the visual quality of a landscape is largely dependent on the visual contrast created between a proposed project and the existing landscape. The contrast can be measured by comparing the project features or components with the major features in the landscape. The basic visual elements of form, line, color, and texture are used to make this comparison in addition to consideration of environmental factors incorporating the angle of observation and length of time the project is in view. The contrast rating worksheets for each KOP assessing BLM-administered lands were completed in the field by BLM Field Office staff. The location of each of the KOP is provided in Mapbook 1 of Appendix 21 B.7. Photorealistic simulations at selected locations within the analysis area relating to BLM lands were also completed.	Consider moving this text to the methods section as visual contrast is used as part of the metric for scale/dominance.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-706	34-37	The Proposed Action would create strong visual contrast that would not comply with current VRM classes at four KOPs. The Proposed Action would not comply with VRM Class III from the Oregon Trail 35 Ruts Interpretive Site (5-33), NHOTIC Entrance SH 86 (5-60), and Virtue Flat OHV Area (5-84) in the Baker Field Office because primarily of strong contrast in terms of form.	Review the following results provided in Table 3-153: Oregon Trail 35 Ruts Interpretive Site (5-33) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "none" in the foreground and "low" in the middleground, corresponding to weak visual contrast. NHOTIC Entrance SH 86 (5-60) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "moderate" in the foreground and "low" in the middleground, corresponding to moderate visual contrast. Virtue Flat OHV Area (5-84) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "none" in the foreground and middleground, corresponding to weak visual contrast. Consider the conclusion that the proposed action would not conform to VRM Class III objectives based on the predominantly weak visual contrast observed from the collection of viewpoints assessed.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-707	14-15	There were no KOPs identified on the BLM-administered lands that would be crossed by the Flagstaff Alternative. Therefore compliance with BLM VRM Class IV was not evaluated for the project components associated with the Flagstaff Alternative.	The conformance determination should not depend on whether KOPs were assigned to that location. It should be assessed by assigning KOPs to that location.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-707	16-19	The section of the Proposed Action that would be equivalent to the Flagstaff Alternative would not comply with VRM Class III from NHOTIC Entrance (8-52) because of the strong contrast created by the project components in terms of form within the existing setting.	Verify the KOP Number at this KOP I not included in Table 3-161. If this KOP should be 5-60 (NHOTIC entrance), please confirm why data presented differ from that provided in Table 3-153 and 3-165 (high vs. moderate ranking for scale and spatial relationship, respectively).	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-707	20-21	The Burnt River Mountain Alternative and the equivalent section of the Proposed Action would meet VRM Class III and Class IV objectives.	Provide an explanation of why these management objectives were achieved.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-707	22-24	There were no KOPs identified on the BLM-administered lands that would be crossed by the Timber Canyon Alternative. Therefore compliance	The conformance determination should not depend on whether KOPs were assigned to that location. It should be assessed by assigning KOPs to that location.	Revised

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
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			with BLM VRM Class II or Class III was not evaluated for the project components associated with the Timber Canyon Alternative.		
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-707	24-29	The section of the Proposed Action that would be equivalent to the Timber Canyon Alternative would create strong visual contrast that would not comply with current VRM Class III at three KOPs. This section of the Proposed Action would not comply with VRM Class III from the Oregon Trail Kiwanis Club Memorial (5-32), NHOTIC Entrance SH 86 (5-60), and Virtue Flat OHV Area (5-84) in the Baker Field Office because primarily of strong contrast in terms of form.	Review the following results provided in Table 3-153: Oregon Trail Kiwanis Club Memorial (5-32) -- Scale and Spatial relationship (of which visual contrast is a component) is ranked as "none" in the foreground and middleground, corresponding to weak visual contrast. NHOTIC Entrance SH 86 (5-60) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "moderate" in the foreground and "low" in the middleground, corresponding to moderate visual contrast. Virtue Flat OHV Area (5-84) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "none" in the foreground and "low" in the middleground, corresponding to weak visual contrast. Consider the conclusion that the proposed action would not conform to VRM Class III objectives based on the predominantly weak visual contrast observed from the collection of viewpoints assessed.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-707	32-36	There were no KOPs identified on the BLM-administered lands that would be crossed by the Willow Creek Alternative or the section of the Proposed Action that is comparable to the Willow Creek Alternative. Therefore compliance with BLM VRM Class III was not evaluated for the project components associated with the Willow Creek Alternative or the comparable section of the Proposed Action.	The conformance determination should not depend on whether KOPs were assigned to that location. It should be assessed by assigning KOPs to that location.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-708	1-6	The Tub Mountain South Alternative would create strong visual contrast that would not comply with current VRM Class III at three KOPs. This alternative would not comply with VRM Class III from the Alkali Springs Interpretive Site (8-1), Oregon Trail ACEC-Birch Creek (8-3), and Virtue Flat OHV Area (5-84) in the Malheur Field Office because primarily of strong contrast in terms of form. The section of the Proposed Action that is comparable to the Tub Mountain South Alternative would be in compliance with VRM Class IV at the Huntington Community KOP (5-5).	Review the following results provided in Table 3-153: Alkali Springs Interpretive Site (8-1) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "none" in the foreground and "low" in the middleground, corresponding to weak visual contrast. Oregon Trail ACEC-Birch Creek (8-3) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "low" in the foreground and middleground, corresponding to weak visual contrast. Virtue Flat OHV Area (5-84) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "none" in the foreground and middleground, corresponding to weak visual contrast. Huntington Community KOP (5-5) - Scale and Spatial relationship (of which visual contrast is a component) is ranked as "none" in the foreground and middleground, corresponding to weak visual contrast. Consider the conclusion that the proposed action would not conform to VRM Class III objectives based on the predominantly weak visual contrast observed from the collection of viewpoints assessed.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-722	11-16	The Proposed Action would visually dominate the characteristic landscape in the Blue Mountain Forest VAU (BA-011) in the Wallowa-Whitman National Forest and would introduce project components that would not conform to common elements of form, line, color, or texture of the landscape within the analysis area in the foreground or middleground distance zone. Therefore the Proposed Action would not meet the VQOs of Retention, Partial Retention, or Modification in this VAU.	Blue Mountain Forest VAU (BA-011) –Clarify where this assessment was made from. Visual contrast on Summit Road within the Blue Mountain State Scenic Corridor was rated as weak, but also "could be nonexistent" (Appendix 1 of Resource Report 1).	Revised
3.2.7.6 Visual Resources	p. 3-722	16-20	Similarly, the Timber Canyon Alternative would not	Review the following results provided in Table 3-153:	Revised

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
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/Environmental Consequences			meet the VQOs of Retention, Partial Retention, or Modification in the Wallowa Mountains (BA-013) and Blue and Wallowa Mountains (BA-014) VAUs because the project components would dominate the characteristic landscape and not appear to conform with the surrounding landscape patterns and elements.	Wallowa Mountains (BA-013) – Impact ratings for scenic quality were ranked as "High" (FG) and "low" (MG). Landscape character FG impact was ranked as "high." Consider the conclusion that the proposed action would not conform to VQOs of modification based on the level of change to scenic quality and landscape character disclosed in Table. Review whether the viewshed of federal and state highways are maintained, and how hat influences plan conformance. Blue and Wallowa Mountains (BA-014) –Confirm that the Timber Canyon Alternative crosses lands administered by the USFS in VAU BA-014. It is difficult from the scale of the map to confirm that the Timber canyon Alternative crosses BA-014. If so, it appears to cross in an area managed as Maximum Modification, where the project could be in conformance.	
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-722	21-22	Table 3-217 summarizes the impacts on USFS lands, including the amount of disturbance to variety classes and sensitivity levels associated with the proposed project.	Clarify how the sensitivity levels were analyzed, where these data are presented in Table 3-217, and how this metric contributes to the conformance determination.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-726	n/a	Entire Scenic and Back Country Byways and National Historic Trails Section	The impact to these linear corridors was well-presented in this section, and provides a clear understanding of the context of direct impacts to these linear features.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-726	5-9	These factors help to determine if the project components would affect the byways or trail's intrinsic values and qualities as well as the user's experience. The thresholds of the relative magnitude of the direct impacts are provided in Table 3-152. The potential impacts that would occur to each of the byways and trails are summarized below in alphabetical order.	Global comment on this section: Provide a summary impact determination for these resources based on anticipated impacts to the byways or trail's intrinsic values and qualities and user experience. (see summary statement provided for Snake River-Mormon Basin Back Country Byway).	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-726	14-16	Approximately 90 percent of the Proposed Action or Horn Butte Alternative within the foreground would be visible along the approximately15.9 miles of this linear platform located in the analysis area.	Insert a space between "approximately" and "15.9."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-726	18-19	More of the Proposed Action would be seen within the foreground of the byway than the Horn Butte 18 Alternative.	Clarify, as this sentence contradicts line 14-16, "Approximately 90 percent of the Proposed Action or Horn Butte Alternative within the foreground would be visible along the approximately 15.9 miles of this linear platform located in the analysis area."	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-727	9-12	Within the foreground and middleground of the analysis areas, the Proposed Action would be seen from 14 percent of the Goodale's Cutoff Study Trail, 32 percent of Timber Canyon Alternative would be seen from the study trail, and 5 percent the Flagstaff, Tub Mountain South, and Willow Creek alternatives would be seen from the study trail in Oregon.	Clarify this sentence. Is it intended to read "…would be seen from 14 percent of the Goodale's Cutoff Study Trail, the Timber Canyon Alternative would be seen from 32 percent of the study trail, and the Flagstaff, Tub Mountain South, and Willow Creek alternatives would be seen from 5 percent of the study trail.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-727	3-727	However, the Timber Canyon Alternative would impact the intrinsic scenic quality of the landscape within the foreground of this alternative for approximately 25 percent of the 80-mile Grande Tour Route.	Is this metric (25% of the 80 mile Grande Tour Route") based on a bare-ground viewshed model? Appendix 1A of Resource Report 1 indicates weak visual contrast from KOP 4-17, though KOPs 4-59 and 4-60 both indicate moderate to strong visual contrast.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-727	29-30	Within the analysis area of the Proposed Action and Flagstaff and Timber Canyon alternatives approximately 12.4, 8.6, and 19.6 miles, respectively, of the Hells Canyon Scenic Byway would occur.	Clarify sentence.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-728	7-9	Approximately 2 percent of the Journey Through Time Scenic Byway would occur within the middleground of the Flagstaff Alternative; the byway would not cross within the foreground of the alternative.	Clarify sentence.	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-729	3-7	The Proposed Action would cross the trail once. The Proposed Action would not compromise the landscape qualities associated with the 528 miles of the Meek Cutoff Study Trail overall or the 453.3 miles of the trail in Oregon, but it would have direct, long-term adverse impacts to the visual setting and user	Provide a summary determination regarding impacts to intrinsic values based on the length of trail impacts.	Revised

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			experience for the 2.8 miles of the trail that would be visible within the foreground of the Proposed Action.		
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-729	14-17	These eight alternatives would dominant the landscape in the foreground of this portion of the trail and would have direct, long-term adverse impacts to the visual setting and user experience for those using the Oregon National Historic Trail.	Change “dominant” to “dominate.” Clarify what geographic area is referred to as “this portion of the trail.”	Revised
3.2.7.6 Visual Resources /Environmental Consequences	p. 3-731/ Table 3-218	n/a	n/a	Clarify that criteria levels indicated for “Miles of Linear Platform with Views of Project” were not calculated using the “total miles of linear platform” value in the Byway/Trail column.	Revised
Section 3.2.8 Cultural Resources					
3.2.8 Cultural Resources	Entire Section	n/a	DEIS uses “above-ground” and “aboveground”	The RLS documents prepared by Tetra Tech/URS use “above-ground.” Spell consistently in future environmental documents.	Text has been revised to use this term consistently.
3.2.8.3 Cultural Resources/Issues Identified for Analysis	p. 3-741	18-19	Many well-traveled segments of the trail have been converted to modern highways and railroad segments, including several segments of Interstate 84 (I-84) in Oregon and Idaho.	The first “modern” highway to use some segments of the Oregon Trail in Oregon is U.S. 30, which was known as the “Oregon Trail Highway.” Segments of this highway have been found to be NRHP eligible in Idaho and other states. Provide a description of the relevant segments, if any.	Text has been revised to read "Many well-traveled segments of the trail have been converted to modern highways and railroads, including several segments of the Old Oregon Trail Highway, U.S. Route 30, and Interstate 84 (I-84), which all share similar alignments through Oregon and Idaho. Numerous markers have been erected at human burial sites, immigrant camps, inscription sites, and areas containing visible wagon ruts in the states crossed by the trail. Segments of the Oregon NHT and trail-associated sites are present in all segments of the study corridor.”
3.2.8.3 Cultural Resources/Issues Identified for Analysis	p. 3-741	27-34	An estimated 550 to 650 Paiute and Bannock people were subjected to a forcible roundup to Fort Simcoe, in northwest Washington, during the winter of 1878-79.The precise location of their route is unknown. However, consultation with tribes indicates that portions of the trail are located within all segments of the analysis area. The relocation is considered by the Shoshone Paiute Tribes as a particularly significant event in their history, during which hundreds of men, women and infants died. Many bodies were left, unburied, along the Trail. The Trail is considered to be a spiritually significant property to the Shoshone Paiute Tribes, and project impacts continue to be evaluated through government-to-government consultation.	While the precise location of the “Trail of Tears” might be unknown, perusal of historic references indicate that it started at Fort Harney and went north to Canyon City and then on to The Dalles where the Columbia River was crossed. There was an established route between The Dalles and Canyon City, with a later extension later on to the Malheur Indian Agency. The portion of the route between The Dalles and Canyon City was established in the early 1860s shortly after the discovery of gold on the John Day. This was because The Dalles was the closest point of supply for the new gold fields. This route has been identified and mapped by Nielsen et al. (1985), with the route between Canyon City and the Agency headquarters described by Nielsen (1987). This route does not come any closer than 50 plus miles to the Project. Idaho Power believes that use of this route can be safely inferred from the points along the route identified in the literature (Hopkins 1969; Ontko 1998:225-232; Rinehart 1879). As such, Idaho Power questions the assertion that the entire Project route was used or closely paralleled by the Trail of Tears. The Bannock and Paiute War, the event that precipitated the Trail of Tears incident, may have involved certain areas along the Project route. If BLM is suggesting that the Project may impact cultural resources related to the Bannock and Paiute War, the EIS should discuss the location of such resources and the impacts. BLM should consider the following literature sources: Hopkins, Sarah Winnemucca 1969 Life Among the Paiutes: Their Wrongs and Claims. Sierra Media, Bishop, California. Reprint. Originally published 1883. Ontko, Gale 1989 *Thunder Over the Ochoco, Volume IV: Rain of Tears*. Maverick Publications, Bend, Oregon. Nielsen, Lawrence E. 1987 In the Ruts of the Wagon Wheels: Pioneer Roads in Eastern Oregon. Maverick Publications, Bend, Oregon. Nielsen, Lawrence E., Doug Newman, and George McCart 1985 *Pioneer Roads in Central Oregon*. Maverick Publications, Bend, Oregon. Rinehart, William V. 1879. Reports of Agents in Oregon. In Annual Report of the Commissioner of Indian Affairs, For the Year 1879, pp. 124-136. Office of Indian Affairs, Washington, DC.	Consultation with Native American tribes indicates that tribal members were collected from Fort Harney, Fort Boise, and the Weiser area and then subjected to a forced march to Fort Simcoe in January of 1879. Although the overall route to Fort Simcoe would have trended northwesterly, the collection of tribal members occurred across the region and they were then routed to Fort Simcoe via existing trail networks. Shoshone-Paiute tribal history indicates that the Oregon NHT through the B2H Project area was a part of the route that their people traveled during the Forced March of 1879. This forced relocation is considered by the tribes as a particularly significant event in their history, during which many men, women, and children died and their bodies were left unburied along the trail. The Forced March of 1879 is considered to be a spiritually significant event to these tribes, and potential B2H Project impacts on the route traveled during the forced march continue to be evaluated through government-to-government consultation.

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3.2.8.3 Cultural Resources/Issues Identified for Analysis	p. 3-742	2-5	The Poison Creek Stage Station is located in Segment 6 along the Proposed Action in Idaho. It contains a house, barn, two root cellars, a schoolhouse, a chicken coop, and an outhouse (NRHP form). This station was constructed in 1886 as a way station for the Jordan Valley-Caldwell stage line, and was listed in the NRHP in 1978.	Consider revising this paragraph to discuss the current baseline conditions at the Poison Creek Stage Station site. The Station is in considerably poorer condition that it was when it was placed on the NRHP in 1978. Many of the outbuildings are gone, and the main structure has suffered significant damage to the walls and roof. In addition, the BPA has already built a 500-kV transmission line within the viewshed of this resource. Also note that it will be included in the ILS.	Revised
3.2.8.4 Cultural Resources/ Methodology	p. 3-743	1-7	Reconnaissance level survey (RLS) was completed within the expanded study area for indirect impacts. BLM Manual 8100 guidance defines an RLS as "…a focused or special-purpose information tool that is less systematic, less intensive, less complete, or otherwise does not meet Class III survey standards… an area surveyed only by reconnaissance methods cannot be considered to be "inventoried" and may be subject to resurvey for other purposes." The parameters of the RLS included above-ground resources located within five miles on either side of centerline of the Proposed Action and all alternatives.	This text should include a more complete excerpt from BLM Manual 8100 that clarifies the purpose of the RLS. As noted in the BLM Manual 8100, Glossary, page 7, one of the purposes of an RLS is to check "class I inventory or class II survey conclusions." Since that was one of the purposes of the RLS, to verify that original evaluations are relevant, it should be noted in this preface to the section as being consistent with the BLM Manual. In addition, the reader is left to wonder whether additional survey would be required when it notes that the area "may be subject to resurvey for other purposes" (from page .21C4 of BLM Manual 8100). The BLM Manual provides caveats as to the need for additional survey by noting that it depends "in part on the purposes and results of the reconnaissance." The BLM should be clear on what these statements mean within the context of the RLS and the overall Project in this section. The subsequent EIS discussions on the ILS provides some clarity on the upcoming additional survey work and how that will build on the RLS, but the definition of the RLS should be geared towards the context of the Project in addition to stating its formal parameters established in BLM Manual 8100.	The term RLS as used in the Final EIS relates to that referred to in the Oregon SHPO guidelines rather than the BLM Manual 8100.
3.2.8.4 Cultural Resources/Methodology	p. 3-743	6	The parameters of the RLS included above-ground resources located within five miles on either side of centerline of the Proposed Action and all alternatives.	Insert "previously recorded" before "above-ground resources." "The previously recorded parameters of the RLS included above-ground resources located within five miles on either side of centerline of the Proposed Action and all alternatives."	Comment noted. The text has been revised to read "The RLS focused on above-ground resources (built-environment) located in the 10-mile-wide corridor (5 miles on either side of the reference centerline) for the Applicant's Proposed Action Alternative and each alternative route that may be subject to visual effects."
3.2.8.4 Cultural Resources/ Methodology	p. 3-743	23-24	The records search for cultural resources on CTUIR lands consisted of two miles on both sides of the Proposed Action centerline only.	This is the same level of Class I records search that was done for the rest of the project; however, as written, it makes it sound as though less effort was completed on the CTUIR. Reword as: "The records search for cultural resources on CTUIR lands consisted of two miles on both sides of the Proposed Action centerline ~~only~~."	Text has been edited to read "The Class I literature search for cultural resources on CTUIR lands also consisted of a 4-mile-wide study corridor (2 miles on either side of the reference centerline) for the Applicant's Proposed Action Alternative only."
3.2.8.4 Cultural Resources/ Methodology	p. 3-743	20	n/a	The discussion on the CTUIR records should make note that an additional "data gap" Class I records search was performed that included an area within 10 miles (indirect effects APE) of the project center line. While not contained in the RLS Report (and thus not in the EIS), it is anticipated that an ILS will be prepared for resources situated within the CTUIR (those lands within the indirect effects APE).	Text has been revised to read "The Class I literature search for cultural resources on CTUIR lands also consisted of a 4-mile-wide study corridor (2 miles on either side of the reference centerline) for the Applicant's Proposed Action Alternative only. An additional "data gap" Class I literature search was conducted in CTUIR to identify cultural resources situated within the 10-mile-wide study corridor (5 miles on either side of the reference centerline) for the Applicant's Proposed Action Alternatives only (Tetra Tech 2015). While not contained in the RLS Report (and thus not in the EIS), it is anticipated that an ILS will be prepared for resources situated within the CTUIR (lands within the indirect effects APE)."
3.2.8.4 Cultural Resources/ Methodology	p. 3-743	27	A portion of the study area encompasses the state of Washington.	This statement suggests that the entire state of Washington lies within a portion of the study area. Suggest rewording as: "A portion of the study area ~~encompasses~~ falls within the state of Washington."	Edited as noted to read "A portion of the study corridor falls in Benton County, Washington."
3.2.8.4 Cultural Resources/ Methodology	p. 3-743	27-28	A portion of the study area encompasses the state of Washington, and the Washington SHPO and USFW were also contacted to obtain record for that area.	Washington and the USFW were only intersected in the 10-mile wide, indirect effects APE, with sites identified through the subsequent "data gap" Class I records search. This sentence should either be moved to the more appropriate Reconnaissance Level Survey section below, or this section should be expanded to more accurately reflect the level of Class I survey that was completed for the project.	Text has been revised to read "The study corridor for the RLS to assess potential indirect effects, primarily visual, on cultural resources was defined as a 10-mile-wide study corridor, 5 miles on either side of the reference centerline, or to the visual horizon—whichever was closer—for the Proposed Action and each alternative route (Tetra Tech 2014). It should be noted that the southern end of Benton County, Washington, near the Columbia River, also is part of the B2H Project area. This area is only intersected in the 10-mile-wide study corridor (indirect effects APE) with cultural resource sites identified through the "data gap" Class I literature search that was completed for the B2H Project. Cultural resources and potential effects on cultural resources identified during the RLS are discussed qualitatively in Sections 3.2.13.6 (Affected Environment) and 3.2.13.7 (Environmental Consequences) of the Final EIS."
3.2.8.4 Cultural Resources/	p. 3-745	22	Surveyors subsequently drove publicly accessible	Suggest including text to provide a more consistent explanation of	Text has been added.

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Methodology			rights-of-way to relocate and record previously recorded resources and to identify any previously unrecorded resources within the RLS APE.	resources identified in the RLS which was provided in the RLS report. The text from the October 2014 RLS Report (page 6, line 15) notes that: "Fieldwork for the survey was conducted by teams of two field crew members who drove publicly accessible ROWs and relocated previously recorded resources in a systematic manner. Newly recorded resources identified during fieldwork that have the potential to be affected by the Project are also included in this analysis. These newly recorded resources were identified from public ROWs by field crew." The resources to be considered in the RLS is also discussed on page 6 line 3 of the October 2014 RLS Report that notes that "Due to the scale of the project and the relatively rural setting for much of the corridor, the identification efforts for the indirect APE primarily focused on previously recorded historical resources."	
3.2.8.4 Cultural Resources/ Methodology	p. 3-745	32-34	The BLM treats all information gathered during ethnographic research as confidential, and as such, specific locations or descriptions of resources are not disclosed in the EIS.	Explain in the methodology subsection how the resource information can be properly evaluated and mitigation developed, given the information is kept confidential. Additionally, explain why the information is confidential. Provide citations to agency regulations or guidance documents regarding confidentiality, if any.	It is correct that all ethnographic and site-specific cultural resources information is treated as confidential. The ethnographic information is provided to the BLM and the BLM uses the information to identify areas sensitive to tribes and characterizes the sensitive areas in the Final EIS. During the development of the final Plan of Development for construction, the information can be used further to micro-site project facilities to avoid and minimize impacts on these sensitive resources. The Final EIS has been modified to reflect this explanation.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-754	24 and 29	(Ruby and Brown 1981)	Why is a book on the Cayuse so heavily cited for an event that happened to Shoshone Paiute peoples? Consider the information in the following source: Sarah Winnemucca Hopkins, Annual Reports of the Commissioner of Indian Affairs, Ontko, etc.	Bibliographic sources have been revised.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-754	30-33	Although historical documentation from Winnemucca Hopkins and Indian Agent W.V. Rinehart indicate that the route of the "Forced March" would have followed a south-north trajectory, government-to-government consultation with the Shoshone Paiute Tribes suggests that travel may have occurred from east to west within the B2H Project area in roughly the same corridor as the Oregon Trail.	This is a description of the Trail of Tears, but it is being referred to as the "Forced March." Be consistent with the event name. See related comments above concerning the amount of the project coincident with the Forced March/Trail of Tears.	The BLM will refer to this event as the Forced March of 1879.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-754	22	550Paiute	Insert a space.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-760	34	varyng	Should be "varying."	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-761	34-35	. . . based on the recovery of a Clovis Point south of Marsing, Idaho (within 2 [sic] miles of the southern terminus of the project).	The site being discussed is approximately ten miles from the southern terminus of the project. Explain why it is relevant here, given the distance from the project.	The text has been deleted
3.2.8.5 Cultural Resources/Cultural Context	p. 3-761 and 3-762	36-38 and 1	Meatte establishes a diversification in projectile point morphology . . . (Bedwell 1973; Musil 2004).	If Meatte established the diversification in projectile point morphology, why are Bedwell and Musil being cited?	The text has been revised to include the reference.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-763	5	…data is currently scarce…	Data "are" is the more accepted usage.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-765	24-35	Paragraph starting with "The Folsom sub-period . .."	The Folsom sub-period, especially in Oregon, does not appear to be well represented by Folsom points. Make that clear. A Folsom point was also found in the Reynolds Creek drainage southwest of Hemingway Butte (Moe 1982). Consider the information in the following reference material: Moe, Jeanne M. 1982 A Folsom Point from the Owyhee Mountains of Southwestern Idaho. *Idaho Archaeologist* 6(1&2):45-46.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-765 and 3-766		The general Northern Great Basin Plano Sub-Period	The discussion appears to be missing discussion of inventory and testing projects in the Warner Valley and Burns areas that have recorded numerous period (and older) sites. This work has been conducted by the University of Nevada Reno Great Basin Paleoindian Research Unit and archaeologists from OSMA.	No change to text made; inclusion of Warner Valley and Burns projects is out-of-scope based on their distance from the B2H Project area.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-767	23-24	Pluvial lakes experienced wide ranging fluctuations in depths and shorelines while piñon pine, juniper, and hybrid scrub oak began to expand across the Great Basin, soon to be followed by the establishment of	There are no piñon pine anywhere near the current project area. Consider removing the reference: "Pluvial lakes experienced wide ranging fluctuations in depths and shorelines while ~~piñon pine,~~ juniper, and hybrid scrub oak began to	The text has been delete

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			modern flora and fauna.	expand across the Great Basin, soon to be followed by the establishment of modern flora and fauna."	
3.2.8.5 Cultural Resources/Cultural Context	p. 3-769	30-31	Obsidian sourcing studies indicate the tool materials came from several distant sources including Gregory Creek to the west, Coyote Wells to the southwest, Timber Butte to the east, and Nevada to the south (Aikens et al. 2011).	The only possible Nevada source for obsidian is the Browns Bench source, which is largely in Idaho. In addition, the obsidian sourcing information discussed here is readily available at Jenkins et al. 2010, which should probably be cited instead of Aikens et al. 2011. Consider the information in the following reference material: Jenkins, Dennis J., Thomas J. Connolly, and Paul W. Baxter 2010 Riverine Resource Use on the Oregon-Idaho Border: Archaeological Investigations at 35ML1328 and 35ML1379, North Ontario, Malheur County. *University of Oregon Anthropological Papers No*. 69. Eugene, Oregon.	The text has been edited as requested to read "Obsidian sourcing studies indicate the tool materials came from the Browns Bench obsidian source in south-central Idaho and northeastern Nevada (Jenkins et al. 2010)."
3.2.8.5 Cultural Resources/Cultural Context	p. 3-771	12-15	Competition for fuel and fodder and damage to the grasslands and water sources from thousands of wagon wheels threatened traditional American Indian lifeways and led to growing dissatisfaction and mistrust among the American Indian tribes, resulting in armed skirmishes and livestock theft (Ruby and Brown 1972:179).	Horses, cattle, oxen, and other activities related to pioneer travel—and not only wagon wheels—likely contributed to damage to grasslands and water sources. Consider amending the sentence as follows: "Competition for fuel and fodder and damage to the grasslands and water sources from thousands of ~~wagon wheels~~ traveling pioneers threatened traditional American Indian lifeways and led to growing dissatisfaction and mistrust among the American Indian tribes, resulting in armed skirmishes and livestock theft (Ruby and Brown 1972:179)."	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-771	n/a	n/a	A discussion of the Utter Massacre should be included, as well discussion of the Snake War which occurred during the American Civil War. The section is very Oregon-centric, and it should be expanded to discuss relevant cultural events in the area around the Idaho portion of the Project, if any.	Text has been added
3.2.8.5 Cultural Resources/Cultural Context	p. 3-772	6-10	While both Paiute chronicler Sarah Winnemucca Hopkins and U.S. Indian Agent W. V. Rinehart . . .	See previous comments concerning the "Trail of Tears" and the "Forced March."	The BLM will refer to this event as the Forced March of 1879.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-773	1-2	Several named roads that were likely based on early trails and wagon roads cross the Proposed Action 1 and alternatives include: . . Highway 95	Highway 95 was preceded by several stage roads (most of which are not discussed in this section) and the Idaho-Oregon-Nevada Highway. Provide discussion regarding the prior roads and their relation to early trails or wagon roads.	Text has been added
3.2.8.5 Cultural Resources/Cultural Context	p. 3-773 through 3-774	p. 3-773 line 39 through p. 3-773 line 2	Many well-traveled segments of the Oregon Trail were converted to modern highways and railroad segments, including several segments of Interstate 84 (I-84) in Idaho and Oregon.	I-84 was preceded by U.S. 30, the Oregon Trail Highway. Many segments remain as frontage roads to I-84. U.S. 30 is a potential cultural resource in its own right.	Text has been revised to read "Many well-traveled segments of the trail have been converted to modern highways and railroads, including several segments of the Old Oregon Trail Highway, U.S. Route 30, and Interstate 84 (I-84), which all share similar alignments through Oregon and Idaho."
3.2.8.5 Cultural Resources/Cultural Context	p. 3-774	7	…The Flagstaff Alternative..	Replace the capital "T" with a lowercase "t" for the Flagstaff Alternative.	Comment noted. The titles of the alternative routes have been modified.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-774	18	. . . up river . . .	Should be down river along the Deschutes. Upriver is away from The Dalles.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-774 and 3-775	28-39 and 1-9	Goodale Cutoff Discussion	This section is somewhat simplistic and inaccurate. At least some of the miners that hired Goodale were trying to reach the new diggings at Florence, Idaho. The "northern alternate", or the route from the Boise River to Virtue Flat, was the segment blazed by Goodale (Suggest reading Dykes 1995, 2010; McGill 2009; Carrey et al. 1979; Idaho State Historical Society 1994; Merill and Wells 1996). It also looks like the Timber Canyon alternative only crosses the Goodale once in the neighborhood of New Bridge. Consider the information in the following reference material: Carrey, Johnny, Cort Conley, and Ace Barton 1979 *Snake River in Hells Canyon*. Backeddy Books, Cambridge, Idaho. Dykes, Fred W. 1995 *Jeffrey's Cutoff: Idaho's Forgotten Oregon Trail Route*. 3rd Edition. Fred W. Dykes, Pocatello, Idaho. 2010 The Jeffrey Cutoff from the Fort Hall Townsite to the Mouth of Ditto Creek Canyon Part of the Jeffrey/Goodale Cutoff: A Final Recap. Fred W. Dykes, Pocatello, Idaho.	Revised Based on GIS data, Link 3-8 crosses the Goodale's Cutoff Study Trail twice (same location). Link 3-8 crosses the main alignment and a spur [0.8-mile-long]).

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				Idaho State Historical Society Goodale's Cutoff from Boise Valley to Powder River. Idaho State Historical Society Reference Series No. 1048. Electronic document, available at http://www.idahohistory.net/Reference%20Series/1048.pdf, McGill, James W. 2009 *Rediscovered Frontiersman: Timothy Goodale*. Oregon-California Trails Association, Independence, Missouri. Merrill, Irving R., and Merle Wells 1996 Goodale's Cutoff from Boise Valley to Powder River. *Overland Journal* 14(1): 9-14.	
3.2.8.5 Cultural Resources/Cultural Context	p. 3-775	22-24	The portion of the NHT in the analysis area is located immediately across the Oregon-Washington border on the northern side of the Columbia River.	Is this "analysis area" the indirect effects APE? If so, please define it that way. This is true throughout the cultural section.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-776	21-35	Sumpter Valley Railroad	The Sumpter Valley Railroad has a lot of discussion considering that is outside of the direct effects APE and with only a tiny bit, largely replaced by a paved highway (SR 7), in the indirect effects APE.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-777	11-23	Idaho Operations	An awful lot of discussion for mines that aren't in the APE. Suggest including a discussion of industrial minerals and decorative stone—the types of prospects that are found in the Idaho portion of the APE.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-777 to 3-779	24-3	Oregon Operations	Several of the districts discussed are well outside the APE (Baker and Mormon Basin). The Chinese Walls discussed by Wegars are in the Baker district and well outside of the APE. Suggest altering this section to be more accurate with respect to the resources that might be impacted by the Project.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-779	10	. . . county area included limestone, . . .	Two commodities that should be included are copper and diatomaceous earth.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-780	3-8	The NRHP-listed Bernard's Ferry . . .	This seems to be an odd place to wedge this discussion. Why isn't it included in a transportation section, or at least in the discussion concerning Idaho gold mining?	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-781	1	. . . dams, and spring board notch trees.	A missing site type (that has already been recorded) would be "skid trail." Also, they are spring board "stumps."	Terms added.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-781	24-26	This resulted in land management by federal . . .	Suggest mentioning that the Forest Service was created first. Suggest including discussion about the Grazing Service, and its eventual merger with the General Land Office to create the BLM.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-781	28	. . . wood product processing plants. . .	Suggest moving this to the timber and logging section.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-782	22	In 1909, Congress . . .	Suggest mentioning that irrigation was not required, and that the Enlarged Homestead Act was also referred to as the Dry Farm Homestead Act. Also suggest discussing the dry farming movement in the west. Failed homesteads, or shady patents associated with speculative homesteaders going after the extra acreage, are responsible for some of the sites encountered.	Text has been revised and added as suggested.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-782			Suggest including discussion of the Stock-Raising Homestead Act of 1916. This act was used fairly often in the project area to patent land. It was also responsible for the establishment of stock driveways, which is pertinent to a discussion on page 3-784, lines 21-22.	Text has been added
3.2.8.5 Cultural Resources/Cultural Context	p. 3-783	27	The Owyhee Historic District was listed on the NRHP in 2010.	This is the Owyhee <u>Dam</u> Historic District.	Revised
3.2.8.5 Cultural Resources/Cultural Context	p. 3-783 and 3-784		Ranching	Include discussion of ranching in Idaho, the amount of livestock brought into the Owyhees to initially support mining, and the "Cattle Barons" that established themselves in the area.	Text has been added.
3.2.8.5 Cultural Resources/Cultural Context	p. 3-784	38	. . . mutton and lamb. . .	Also wool?	Text has been added.
3.2.8.6 Cultural Resources/Affected Environment	p. 3-784 to 3-813	n/a	n/a	A clear definition of the analysis area would improve this section. As written, many of the resources discussed sound as they are in direct danger of destruction, when in reality many are merely in the indirect effects APE and may not be effected at all.	Text has been added to include specific location of the resources in the B2H Project APEs.

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3.2.8.6 Cultural Resources/Affected Environment	p. 3-785	24	A Class I records search . . .	A modified Class I records search was also conducted out to five miles on either side of the center line to identify resources in the indirect effects APE to support the RLS/ILS efforts. This Class 1 concentrated on resources where the setting was important (buildings, cairn sites, rock art, etc.). Discussions about the Class I need to be improved throughout the cultural section.	Discussion regarding the Class I literature search results has been improved throughout the cultural section.
3.2.8.6 Cultural Resources/Affected Environment	p. 3-792	17-18	. . . as are two segments of the Goodale's Cutoff Trail . . .	Based on GIS data of the alternative as well as mapping of the trail by McGill, it appears that the Timber Canyon Alternative only crosses the Goodale Trail once. Verify.	Comment noted. Additional Class I data have been compiled and the affected environment and environmental consequences sections presented in the Final EIS reflect these data. Based on GIS data, Link 3-8 crosses the Goodale's Cutoff Study Trail twice (same location). Link 3-8 crosses the main alignment and a spur [0.8-mile-long]).
3.2.8.6 Cultural Resources/Affected Environment	p. 3-792	25-27	The Oregon NHT runs parallel to, and several miles west of the Proposed Action in this analysis area; the Virtue Flat segment of the NHT intersects the Timber Canyon Alternative in the area east of Baker City.	The Timber Canyon alternative leaves the Oregon NHT corridor SE of Durkee. The Oregon NHT is quickly outside of the indirect effects APE until the Project rejoins the trail corridor near North Powder. This alternative avoids the Virtue Flat segment near Baker City by many miles. Revise.	Comment noted. Additional Class I data have been compiled and the affected environment and environmental consequences sections presented in the Final EIS reflect these data.
3.2.8.6 Cultural Resources/Affected Environment	p. 3-800	8 and 9	The analysis area for the Double Mountain Alternative contains only two known cultural resources: a historic and a multicomponent trash scatter.	What these two cultural resources are is unclear based on this description. Revise.	Comment noted. Additional Class I data have been compiled and the affected environment and environmental consequences sections presented in the Final EIS reflect these data.
3.2.8.6 Cultural Resources/Affected Environment	p. 3-801	11-13	Prehistoric resources are frequent and include several prominent petroglyph locations, notably the NRHP-listed Map Rock Petroglyphs Historic District and Givens Hot Springs area.	Givens Hot Springs area is across the river from Map Rock, and is not generally considered a notable petroglyph location. It is more known for the presence of house pits.	Revised
3.2.8.6 Cultural Resources/Affected Environment	p. 3-801	20	Neither the Shoshone Paiute Tribes nor CTUIR have disclosed the location of TCPs or other resources . . .	Explain in the methodology subsection how the resource information can be properly evaluated and mitigation developed, given the information is kept confidential. Additionally, explain why the information is confidential. Provide citations to agency regulations or guidance documents regarding confidentiality, if any.	It is correct that all ethnographic and site-specific cultural resources information is treated as confidential. The ethnographic information is provided to the BLM and the BLM uses the information to identify areas sensitive to tribes and characterizes the sensitive areas in the Final EIS. During the development of the final Plan of Development for construction, the information can be used further to micro-site project facilities to avoid and minimize impacts on these sensitive resources. The Final EIS has been modified to reflect this explanation.
3.2.8.6 Cultural Resources/Affected Environment	p. 3-801 and 3-802	32-2	Impacts to segments of the Shoshone Paiute Trail of Tears is also a paramount concern for the Shoshone Paiute Tribes. The Trail is considered to be a spiritually significant property to Tribe, and project impacts continue to be evaluated through government-to-government consultation.	While the spiritual significance of the Trail of Tears to the tribe is not in doubt, evidence indicates that the Trail of Tears was along the Canyon City to The Dalles wagon road, and as such, is well outside the APE for the Project.	It is correct that all ethnographic and site-specific cultural resources information is treated as confidential. The ethnographic information is provided to the BLM and the BLM uses the information to identify areas senstive to tribes and characterizes the sensitve areas in the Final EIS. During the development of the the final Plan of Development for construction, the information can be used further to micro-site project facilities to avoid and minimize impacts on these sensitive resources. The Final EIS has been modified to reflect this explanation.
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-802	5	The data used for analysis reflects…	Data is plural and relevant verb should be amended to reflect that.	Revised
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-802	13-14	The ethnographic data .. is…	Data is plural and relevant verb should be amended to reflect that.	Revised
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-802	19-21	Cultural resources identified in the RLS as requiring additional evaluation and assessment will be completed during the ILS, and the results…	Sentence is unclear. Suggest restructuring to read "Further analysis of cultural resources identified in the RLS as requiring additional evaluation and assessment will be completed during the ILS, and the results….."	Text has been edited to reflect this comment (refer to Section 3.2.13.4) "Cultural resources that were documented were 45 years old or older at the time of the RLS. Resources that were found to be listed in the NRHP, NRHP-eligible or potentially eligible for listing in the NRHP, or resources that have the potential to be indirectly (visually affected) affected by the B2H Project, were recommended to move forward for further evaluation and impact analysis through an ILS, which will occur in Phase II of the cultural resources inventory for the B2H Project." and "An ILS, the final phase of the VAHP as per the Programmatic Agreement for the B2H Project, will be conducted for built environment resources in the indirect effects APE for the final Agency Preferred Alternative Route. The ILS will be conducted on select properties upon after consultation with the appropriate parties to the Programmatic Agreement. The results of the ILS will be reported after issuance of the Final EIS."
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-802	23	Use of terms "cultural resource" and "historic property"	Be sure the environmental document provides definitions of terms such as cultural resource and historic property and that the operational definitions stay consistent throughout the document. One term, "historic property" has a meaning defined within 36 CFR 800.16 and the other	Revised

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				term ("cultural resource") has a less prescriptive regulatory meaning.	
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-803	18	*Indirect,* involving visual, auditory, and atmospheric impact...	This paragraph lacks an explanation of how these impacts may diminish the resource's historic integrity, particularly upon its setting, feeling, and association. The October 2014 RLS Report (p. 2, line 32) elaborates a bit more on this when it notes that "Indirect effects that are significant enough to be considered adverse are those that would diminish the property's integrity. Those aspects of integrity that are most likely to be affected by changes in the visual environment include setting, feeling, and association."	Text has been revised to read "The construction, operation, and maintenance of the B2H Project would result in both direct and indirect adverse effects on cultural resources. Under the law, an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The types of potential impacts on cultural resources include: • Direct and permanent ground disturbance of cultural resources resulting in damage to intact surface and subsurface cultural materials, such as artifacts and features, during construction of access roads, ancillary facilities, and tower locations. • Direct and indirect long-term visual, atmospheric, and auditory intrusions that could compromise aspects of site integrity, such as setting, feeling, and association, which are components of NRHP eligibility. • Direct and indirect permanent disturbances of cultural resources due to changes in public accessibility (e.g., unauthorized use of access roads). It is important to note that the direct and indirect effects APEs are indicative of physical areas of disturbance in which resources may be affected directly or indirectly by the construction of the B2H Project and its' associated features. The B2H Project APEs typically are based on distance zones centered on construction rights-of-way. This analysis is not meant to be reflective of impact zones related to ground disturbance. Direct effects on cultural resources identified in the RLS, as requiring further analysis, will be determined during the ILS. Analysis of indirect effects will occur following the process outlined in the VAHP workplan, which will be appended to the Programmatic Agreement for the B2H Project. Direct effects on cultural resources located in the 500-foot-wide study corridor can be avoided through micro-siting of B2H Project elements, such as towers, roads, and substation structures. However, it is important to note that avoidance of direct effects through micro-siting and monitoring of construction activities will not account for indirect effects that may result from increased access and future operation and maintenance of the B2H Project."
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-803	24	At the time of this writing, evaluation of indirect impacts to resources identified in the RLS as requiring further analysis has not occurred.	Suggest modifying the text in this sentence to "Impacts to resources identified in the RLS as requiring further analysis will be determined during the ILS."	Text has been edited to read "Direct effects on cultural resources identified in the RLS, as requiring further analysis, will be determined during the ILS. Analysis of indirect effects will occur following the process outlined in the VAHP workplan, which will be appended to the Programmatic Agreement for the B2H Project. Direct effects on cultural resources located in the 500-foot-wide corridor can be avoided through micro-siting of B2H Project elements, such as towers, guy-wires, roads, and substation structures. However, it is important to note that avoidance of direct effects through micro-siting and monitoring of construction activities would not account for indirect effects that may result from increased access and future operation and maintenance of the B2H Project."
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-804	11	the RLS, which consisted of a records search and "windshield survey" of cultural resources located within a 10-mile-wide corridor of the Proposed Action and alternatives that could potentially be visually impacted by the project;	The term "windshield survey" is not used in either the VAHP or the October 2014 RLS Report. It is also not discussed in the DEIS Methodology section 3.2.8.4. We recommend that this discussion be edited to be more consistent with the description in these two predecessor documents. Suggest modifying text to read "the RLS, which consisted of a records search and ~~windshield~~field survey ~~of~~ to identify cultural resources located in the 10-mile wide corridor of the Proposed Action and alternatives that ~~could potentially~~ possess integrity and have the potential to be visually impacted by the project."	Comment noted. The effects analysis subsection has been revised and the text has been edited to reflect the modifications to the methodology (refer to Section 3.2.13.4 [Methods]).
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-805/ Table 3-245	n/a	Sensitivity Values and Weightings	The table describes the relative weightings of different types of resources. The table assigns a "3" value for "Historic trails lacking integrity of physical features or trail segments deemed noncontributing." The BLM should consider providing a value for historic trails that retain integrity and the associated physical features or trail segments that are deemed contributing.	Comment noted. The ranking system has been revised and the text has been edited to reflect the the modifications to the methodology.
3.2.8.7 Cultural Resources/	p. 3-808	10-11	. . . and 1 for resources in the 750-foot-5 miles of	The farther away from the center line, the less likely the indirect impacts	Comment noted. The ranking system has been modified and the text has

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Environmental Consequences			centerline; . . .	will be significant. This is based solely on distance and does not take into account screening by topography. Could this formula be adjusted somehow to reflect these facts, especially since a bare earth model was completed?	been edited to reflect the changes to the methodology.
3.2.8.7 Cultural Resources/Environmental Consequences	p. 3-808	19	(Count of cultural resources/survey acreage within 750-5 miles x sensitivity multiplier)	The formula is incomplete, suggest adding "x 1 +."	Comment noted. The ranking system has been revised and the text has been edited to reflect the changes to the methodology.
3.2.8.7 Cultural Resources/Environmental Consequences	p. 3-809/ Table 3-246		Segment 6 – Treasure Valley	This segment is formatted differently than the rest. Consider filling the Segment/Alternative cell with the appropriate name of the segment and the index score should be regular text (it appears currently in bold).	Comment noted. This table has been revised/replaced to reflect the modifications to the methodology. Additional data has been compiled and the impacts assessment presented in the Final EIS reflects these data and the revised methodology.
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-809/ Table 3-246			Considering some of the erroneous statements presented in section 3.2.8.6, some of the potential impact ratings are suspect (especially for the Timber Canyon Alternative). Rreview and revise.	Based on comments received on the Draft EIS, the alternative routes have been re-analyzed for the Final EIS. Additional data have been compiled and the impacts assessment presented in the Final EIS reflect these data and the revised methodology.
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-811	16-19	The Timber Canyon Alternative possesses a medium Potential Impact Index, as compared to the high Potential Impact Index calculated for the corresponding segment of the Proposed Action. The higher Potential Impact score for the Proposed Action is based upon the presence of a segment of the high-sensitivity Oregon NHT within 250 feet of centerline.	This statement seems to contradict earlier descriptions of the resources within the alternative. It was earlier reported that Timber Canyon crossed the Goodale Trail twice, as well as intersected the Virtue Flat segment of the NHT. Clarify, correct, and make consistent the appropriate sections.	Comment noted. Based on comments received on the Draft EIS, the alternative routes, including the Timber Canyon Alternative, have been re-analyzed for the Final EIS. Additional data have been compiled and the impacts assessment presented in the Final EIS reflects these data and the revised methodology.
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-813	7	The Treasure Valley Segment produced a combined potential impact index score of 9 and is considered to have a high potential for impacts to cultural resource.	"Cultural resource" should be plural: "The Treasure Valley Segment produced a combined potential impact index score of 9 and is considered to have a high potential for impacts to cultural resources."	Comment noted. Based on comments received on the Draft EIS, the alternative routes, including the Timber Canyon Alternative, have been re-analyzed for the Final EIS. Additional data have been compiled and the impacts assessment presented in the Final EIS reflects these data and the revised methodology.
3.2.8.7 Cultural Resources/ Environmental Consequences	p. 3-813	29	The discussion below provides a detailed presentation of the Potential Impact Index scores for cultural resources for each of the six segments and the alternative and corresponding portions of Proposed Action within each one.	This sentence is at the very end of the section and appears to be in the wrong location. Suggest moving to the beginning of p. 3-810 before Segment 1 results paragraph or deleting.	Comment noted. Based on comments received on the Draft EIS, the alternative routes have been re-analyzed for the Final EIS. Additional data have been compiled and the impacts assessment presented in the Final EIS reflects these data and the revised methodology.
Section 3.2.9 Naitonal Historic Trails					
3.2.9 National Historic Trails/General	General	General	"Linear Platform"	The term "linear platform" should be defined so that the reader understands its usage within certain contexts. This term appears in the visual section and appears to have a distinct meaning in that analysis.	This terminology has been removed from the NHT section.
3.2.9.2 National Historic Trails/Regulatory Framework	p. 3-818	30-35	As NRHP-listed or eligible historic properties, the Oregon and the Lewis and Clark NHTs, and the Meek Cutoff and Goodale's Cutoff study trails are all properties that require evaluation of effect under Section 106. Segments and sites associated with the trail located in the direct and indirect area of potential effects established for the project will be assessed through a combination of desktop analysis, reconnaissance survey and intensive level survey associated with the Section 106 process. Project effects will be determined in consultation with tribes and parties to the Programmatic Agreement.	This paragraph operates under the assumption that the Oregon NHT and Lewis and Clark NHT, in addition to the Meek Cutoff and Goodale's Cutoff, are NRHP-listed or eligible historic properties. The discussion of the NRHP eligibility of these trails is a bit more nuanced as the text does not state who determined the trails (in their entirety or in part) were eligible for the NRHP or if there are NRHP-listed segments. If the BLM considers these properties to be eligible for the NRHP then it should be more explicit in that decision or note the applicable NRHP nomination or other federal agency document that has made that determination. A more nuanced discussion should include a summary of how these trails are approached by the BLM from an NRHP eligibility standpoint. Is the whole trail corridor eligible for the NRHP regardless if there are any trail remnants or not? Or are there contributing and non-contributing segments and sites associated with the trail (which could be considered as a part of a larger historic district)? There are substantive disagreements between federal agencies, SHPOs, and Tribes, for example, as to the eligibility of the Lewis and Clark NHT in certain areas along that trail's corridor where there is no physical trace of the Expedition and where the physical landscape has been modified. *See, e.g.*,: http://www.bpa.gov/news/FOIA/2013/13-01584/BPA-2013-01584-FResponse.pdf. The eligibility question is key to the assessment of effects and should therefore be explored in more depth within the context of historic trails.	The methodology has been refined to identify impacts on contributing trail traces and trail-associated cultural sites than using the entirety of the trail as a NRHP-listed property.
3.2.9.2 National Historic Trails/Regulatory Framework	p. 3-820	3-5	Factors to be considered when applying the contrast criteria include distance, angle of observation, the duration of the view of the project components, relative size or scale, and spatial relationships.	The Draft EIS does not appear to be considered existing cultural modifications. Here, cultural modifications are indicative of existing impacts to a setting, i.e. existing transmission and distribution lines, interstate highways, towns. It does not appear that the analysis did not properly consider these existing impacts, with the possible exception of	The analysis approach was updated to include existing cultural modifications as a key factor in the assessment of impacts resulting from the B2H Project.

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				the discussions of Historic and Cultural Settings, where the statements are seemingly contradictory, like "While modern intrusions have impacted the historic setting of these trails segments, the segments largely retain their historic and cultural setting" (Pg. 3- 854, lines 12-13).	
3.2.9.4 National Historic Trails/Trail History	p. 3-820	20-23	Although formal documentation has never occurred, the Shoshone-Paiute Tribes maintain that segments of the Oregon NHT generally follow the "Trail of Tears" followed by Shoshone and Paiute peoples during their forced march to Fort Simcoe, Washington.	See comments provided on the "Trail of Tears" in the cultural section.	This text has been removed.
3.2.9.4 National Historic Trails/Trail History	p. 3-821	13-15	In the past decade, community interest and partnerships have led to the development, improvement, and rehabilitation of several recreation facilities and interpretive sites. Most notably are the construction of the National Historic Oregon Trail Interpretive Center (NHOTIC) in 1992 and ongoing rehabilitation of its historic landscape (BLM Preserve America 2004), as well as improvements to parking facilities and interpretive signage at several Oregon NHT interpretive sites.	The year 1992 is not in the past decade, suggest revising. The BLM Preserve American 2004 reference material is not included in the literature cited. Consider include the reference there and explaining how the establishment of OHV trails in Virtue Flat fits into the BLM's historic landscape rehabilitation efforts.	Text updated
3.2.9.4 National Historic Trails/Trail History	p. 3-823	12	"Meriweather" Lewis	Should be "Meriwether."	Text updated
3.2.9.4 National Historic Trails/Trail History	p. 3-823	24-28	The 2.2-mile-long segment of the Trail/Scenic Byway located in the B2H Project is only being considered in the analysis in terms of the visual APE (5 miles) for cultural resources which extends across the river into Washington (see Section 3.2.8 Cultural Resources). It is on private land on the north side of the Columbia River in Washington State and is identified in the 1982 CMUP as part of the "Columbia River Segment" of the NHT (NPS 1982).	Elsewhere in the document (Table 3-252) there is information indicating that the distance is 1.8 and not 2.2 miles for a specific alternative. Explain the difference. Consider whether it is only the Scenic Byway that is affected, since the actual route is now underwater. Additional information should be provided as to whether or not the management plan considers this area to be an important part of the LCNHT from a primary use standpoint. The management plan (1982) notes that Boardman Park represents a potential opportunity area for an interpretation panel. Additional information will be provided in the ILS that discusses the LCNHT in this area to clarify the relative integrity of the LCNHT's landscape in this area.	This text has been removed based on NPS comments to address effects on the trail setting and the auto route on the Oregon-side.
3.2.9.4 National Historic Trails/Trail History	p. 3-824	23-25	This Cutoff Trail left the Oregon Trail at Fort Hall, Idaho proceeding west through the Camas Prairie to the north of the Snake River Valley en route to where it rejoined the Trail at the Powder River, near Baker City.	The Jeffrey's portion of the cutoff rejoins the Oregon Trail (OT) on Ditto Creek in Idaho (Dykes 1995, 2010). The segment that peels off from the OT on the Boise River Weiser and rejoins the OT near Flagstaff Hill was made passable for wagons by Goodale as he was leading a train of gold seekers over Indian trails already known to him (Idaho State Historical Society 1994; McGill 2009). The references (Dary 2004; McGill 2009; Wells 1972) are not located in Chapter 6 References; unable to confirm these statements. Dykes, Fred W. 1995 *Jeffrey's Cutoff: Idaho's Forgotten Oregon Trail Route*. 3rd Edition. Fred W. Dykes, Pocatello, Idaho. 2010 The Jeffrey Cutoff from the Fort Hall Townsite to the Mouth of Ditto Creek Canyon. Part of the Jeffrey/Goodale Cutoff: A Final Recap. Fred W. Dykes, Pocatello, Idaho. Idaho State Historical Society. 1994. Goodale's Cutoff from Boise Valley to Powder River. Idaho State Historical Society Reference Series No. 1048. Electronic document, available at http://www.idahohistory.net/Reference%20Series/1048.pdf, McGill, James W. 2009 *Rediscovered Frontiersman: Timothy Goodale*. Oregon-California Trails Association, Independence, Missouri.	The trail history text has been updated.
3.2.9.4 National Historic Trails/Trail History	p. 3-825	4-26	Meek Cutoff Study Trail	The story of the Meek Cutoff does not end with the party Meek was leading arriving at the Deschutes River. Additional information can be acquired from: Brimlow, George F. 1951 *Harney County, Oregon, and Its Range Land*. Harney County Historical Society, Burns, Oregon.	The trail history text has been updated.

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				Clark, Keith, and Lowell Tiller 1967 *Terrible Trail: The Meek Cutoff, 1845*. Caxton Printers, Caldwell, Idaho. Nielsen, Lawrence E., Doug Newman, and George McCart 1985 *Pioneer Roads in Central Oregon*. Maverick Publications, Bend, Oregon.	
3.2.9.5 National Historic Trails/Methodology	p. 3-825 through p. 3-826	p. 3-825 line 34-35 through p. 3-826 line 1-2	As previously noted, the National Register of Historic Places-listed and -eligible historic properties, both previously documented and undocumented segments of NHTs will be recorded and evaluated for impacts through a combination of desktop analysis, reconnaissance survey and intensive level survey performed associated with the Section 106 process.	This sentence is unreadable. Text or punctuation appears to be missing.	The sentence has been removed.
3.2.9.5 National Historic Trails/Methodology	p. 3-826	4	Potential impacts will be included in the Final EIS. .	Double period at end of the sentence.	The sentence has been removed.
3.2.9.5 National Historic Trails/Methodology	p. 3-826	17-18	For this analysis, the foreground distance zone is defined as the area up to 0.5 mile from the Proposed Action or the alternatives, and the Middleground distance zone is the area from 0.5 to 5.0 miles.	Explain why there are only fore- and middleground zones? The BLM VRM Manual defines the middleground as being from 3 to 5 miles. The establishment of a background zone would likely result in a more nuanced and meaningful interpretation of impacts, especially considering the mountainous terrain for most of the project. At the very least, some meaningful justification of the zones used would be beneficial.	The study area for determing impacts on NHTs was defined as a 5-mile buffer, which corresponds with the BLM foreground-middleground distance zone. Additional nuance was added by breaking down the middleground distance zone into multiple sub-zones for the linear effects analysis.
3.2.9.5 National Historic Trails/Methodology	p. 3-827/ Table 3-247 p. 3-838/ Table 3-252		Duration of View heading.	The heading "Duration of View" implies a measure of time, however, the measures in the table correspond to distances or lengths. Consider modifying the title of this heading to clarify that it relates to a measure of distance or length. *See also* Table 3-252.	These tables have been removed.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-828/ Table 3-248		Proposed Action—Total Number of Crossings	This number is difficult to confirm. Reading through the segment descriptions, the reader is unable to come up with 11 crossings of the trail for the Proposed Action.	The tables have been updated.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-828/ Table 3-248	Table 3-248	Proposed Action – Total Miles of Trails with Views of Project Components	The heading for this column should more appropriately read "Total Miles of Trails with Potential Views of Project Components" as the use of the bare earth visibility analysis does not account for potentially intervening vegetation or the built environment components of the visual landscape and therefore it should not be stated as being definitive.	The tables have been updated to include "potential" for visibility analyses.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-830/ Table 3-250		Proposed Action—Total Number of Crossings	This number is difficult to confirm. The data that Idaho Power has indicate that the Goodale is crossed only once.	The tables have been updated.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-832	8-10	Existing development adjacent to the Trail in this portion of the B2H Project analysis area is predominantly agricultural, with fallow fields, numerous paved and two-track roads, transmission lines and towers, wind farms, and scattered ranches.	Suggest replacing the term "fallow fields" with "agricultural fields," because by definition fields do not remain fallow indefinitely.	Revised
3.2.9.6 National Historic Trails/Affected Environment	p. 3-832	13-14	The Proposed Action and Horn Butte Alternative would largely parallel the Trail, crossing it once approximately 0.6 miles south of Immigrant Lane and 4.6 miles east of Cecil.	As written, it sounds like the Trail is only crossed once at a point that is 0.6 miles south of Immigrant Lane and 4.6 miles east of Cecil. Verify that it is crossed twice, once at a point that is 0.6 miles south of Immigrant Lane and once at a point that is 4.6 miles east of Cecil.	The text has been removed.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-832	22-32	Segment 1: Lewis and Clark NHT	This section should note if there are any potential sites associated with the LCNHT or if this segment of the route is particularly noteworthy in the context of the L&C journals.	The text has been updated to include trail management components.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-832	23	." . . State Route 14"	Specify that this is Washington State Route 14.	The text has been removed.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-833	36	Two generally east-west trending alignments of the Goodale's Cutoff Study Trail stretches from the unincorporated community of Richland to Baker City.	The "stretches" should be "stretch."	Revised
3.2.9.6 National Historic Trails/Affected Environment	p. 3-834	7-9	This alternative would cross the northern alignment of the Trail approximately 1.1 miles east of the unincorporated community of New Bridge and would intersect the southern alignment of the Trail approximately 2.4 miles west of Richland.	The alternative does not pass to the east of New Bridge. It is not common knowledge that there is a north and south alternate to the Goodale Trail. The description of the Goodale presented on page 3-824 does not make that clear, does not provide any maps for the Goodale, nor does it provide a good reference(s) indicating there was a split. The	The text has been removed.

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				map on the National Park Service website for the Study only shows one route (although the scale is very coarse). Indicate where the information for this southern route comes from.	
3.2.9.6 National Historic Trails/Affected Environment	p. 3-834	17	…the Oregon NHT runs general south…	Should be "generally" and not "general."	Revised
3.2.9.6 National Historic Trails/Affected Environment	p. 3-834	21	Burnt "Rive"	Should be Burnt "River" and not "Rive."	Revised
3.2.9.6 National Historic Trails/Affected Environment	p. 3-834	27-28	The Proposed Action would largely parallel the Trail and would cross it once approximately 1.4 miles southeast of Weatherby and just north of I-84.	Again, it is unclear if the Proposed Route is crossing the Trail once at a point 1.4 miles southeast of Weatherby and just north of I-84, or once southeast of Weatherby and once north of I-84. Clarify.	The text has been removed.
3.2.9.6 National Historic Trails/Affected Environment	p. 3-836	17	Burnt Mountain	Use the term Burnt River Mountain for consistency.	The text has been removed.
3.2.9.7 National Historic Trails/Environmental Consequences	p. 3-836	19	"emote"	Change "emote" to "remote."	Revised
3.2.9.7 National Historic Trails/Environmental Consequences	p. 3-837	8	The Proposed Action would cross the Oregon NHT 11 times . . .	This number is difficult to confirm. Reading through the segment descriptions, the reader is unable to come up with 11 crossings of the trail for the Proposed Action.	The tables have been updated.
3.2.9.7 National Historic Trails/Environmental Consequences	p. 3-837	23-24	The Longhorn Alternative and Longhorn Variation would have identical overall low to moderate impacts to this relatively small portion (2.2 miles) of the Lewis and Clark NHT in Washington.	The Lewis and Clark NHT is on the edge of the 5 mile visual impact study area, and there are numerous "existing cultural modifications" as well as lots of commercial developments between the Alternatives and the NHT and behind the NHT. Consider whether the impacts should be low and not moderate.	The analysis has been updated to include crossing of Lewis and Clark NHT Auto Tour Route in Oregon.
3.2.9.7 National Historic Trails/Environmental Consequences	p. 3-838/ Table 3-252		Summary of Impacts table	In addition to the use of "duration of view" which suggests a measure of time (as opposed to distance), the characterization of impact level does not correspond well with what is being measured. High impact, for instance, is difficult to equate with distance particularly when there are intervening factors such as contrast, the presence of "existing cultural modifications", and when it affects a small segment of the NHT from a great distance as noted in the comment above. In addition, it would seem that visual contrast would be more appropriate as a stand-alone metric for measuring impacts in this overall impacts analysis. Scale/spatial relationships convey a part of the contrast story within the definitions provided above, but in a table it does not provide contrast an appropriate emphasis.	Impact tables have been removed and are discussed in the narrative.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-843	1-24	Cultural and Historic Setting Analysis	This section of the NHT impacts analysis does not cite the RLS Report and its approach for assessing visual impacts to historical resources. The RLS provides an approach for assessing impacts to resources, such as historic trails, that should be referenced and described so that readers can understand how it dovetails (or is distinct) from the NHT impact analysis.	The RLS Report is associated with cultural resources and Section 106 requirements, which are discussed in that section.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-843	5-7	Generally, the historic setting of a trail segment was considered to be retained if the segment was located in a pristine wilderness area with no visible modern intrusions, such as transmission lines, and/or buildings and structures.	Since there are no wilderness areas in the study area, does that mean there are no segments of the trail that retain their historic setting?	This text has been removed.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-848	18-20	Despite existing impacts from modern development and erosion, 13 segments of the Oregon NHT on BLM land in the general vicinity of area between Quartz and Huntington (Burnt River Canyon Analysis Unit) have retained their historic setting.	There's a lot of modern development between Quartz and Huntington, including an interstate highway, railroad, cement plants, mines and gravel pits, existing transmission lines, substations, wind farms, buried pipelines, farms, and ranches. Additionally, the Proposed Route swings out of sight of the I-84 corridor for a few miles in one area. In order for the public to evaluate BLM's determination of 13 segments having retained their historic setting—despite all of the modern development—consider providing a map identifying the relevant segments and explaining how each segment is not impacted by the modern development.	This text has been removed. Large format maps have been added to the map volume to depict effects as well as showing some of the existing modifications (Interstate 84, existing transmission lines, etc.).
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-849	24-29	Although intrusions are visible from multiple vantage points along the trail, the majorities [sic] of these features is at a higher elevation than the trail segment and are thus not visible or are shielded from view by the steep canyon walls and surrounding hills. For	Although in the trail corridor, there is no trace of the Meeks trail at this location since it has been impacted from road construction (Lines 17 and 18 on same page). In addition, there are modern intrusions in the canyon, such as a RR grade, several irrigation ditches, a diversion dam, and bladed roads, so the cultural setting is already compromised.	Due to views of skylined structures between Malheur Canyon and Vines Hill, from the additional alignments of the Meek Cutoff Study Trail received from the NPS, effects in this area are high in magnitude. This is due to the prominence of the transmission line structures dominating views, when compared to the existing modifications present, from the trail

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			these reasons, as well as proximity of the Proposed Action to the trail segment, construction of the transmission line would have a moderate magnitude of impact on the historic and cultural setting of the Meek Cutoff at this location.	Taking into consideration that the line is "not visible" or "shielded from view by the steep canyon walls," explain how the impact is moderate and not low?	alignment under study by the NPS. Note, these effects are associated with the visual resource component and not the cultural and historic component.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-853	20-36	Visual Resources	The Timber Canyon Alternative crosses Goodale's Trail and as such would loom over the trail and introduce contrasting elements. Explain how that contrast is moderate and not high. Change "Posey" Valley to "Posy" Valley.	This text has been removed. High impacts have been identified on the Goodale's Cutoff Study Trail resulting from the Timber Canyon Alternative.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-854	6-8	Although this segment was recommended for further study during the inventory level survey, the magnitude of impact on the Goodale's /Sparta Trail would be none based on the proposed location of the Timber Canyon Alternative.	The Timber Canyon Alternative crosses directly over the Goodale's/Sparta Trail. While direct physical impacts can be avoided by micrositing, there would definitely be an impact to the feeling and setting aspects of the site's integrity.	The assessment used in the Final EIS for the National Historic Trails section did not address Section 106 requirements for this trail segment, refer to the cultural resources section. Note, the alignments being studied by the NPS were assessed for both direct and indirect impacts as well as mitigation to minimize or remove these effects.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-854	9-16	While modern intrusions have impacted the historic setting of these trail segments, the segments largely retain their historic and cultural setting. As such, . . . would have a moderate magnitude of impact on the historic and cultural setting . . .	This seems to contradict the previous section. At what level do modern intrusions reach a level where trail segments would no longer retain their historic and cultural setting?	This text has been removed.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-865	5-31	Willow Creek Alternative—Goodale's Cutoff Study Trail (entire section)	Explain why BLM did not determine that no analysis is needed because the Goodale Trail is nowhere near this alternative? It appears, in a few instances, that the Goodale was being mixed up with the Oregon Trail, especially in the Historic and Cultural Setting section. Suggest revising this section.	The section has been revised.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-867	12-13	…the springs for which the route is named was…	The term "was" should be "were."	This text has been removed.
3.2.9.8 National Historic Trails/Compliance with BLM	p. 3-868	5-31	Tub Mountain Alternative—Goodale's Cutoff Study Trail (entire section)	This is an unnecessary discussion, since the Goodale is nowhere near this alternative. Suggest removing this discussion.	The section has been removed.
Chapter 6 References for Section 3.2.9	p. 6-49	12-17		The references to the two Anderson et al documents are described later as being authored by Tetra Tech (see Chapter 6, page 6-52, lines 5-10). The author attributions should be consistent throughout the document. Different years are also provided for the 15% report in Oregon. One reference has a 2012 date and the other has a 2013b date. Be sure to check the applicable cultural resources sections to ensure that the appropriate year of the publication is provided to ensure the proper reference is noted.	The reference section has been updated.
Section 3.2.10 Air Quality and Climate Change					
3.2.10.1 Air Quality and Climate Change/ Regulatory Framework	p. 3-874/ Table 3-255	Entire Table	n/a	If Part 70 Operating Permits or other permits are necessary, dispersion modeling may be required. Consider change "No" to "Possibly" for Dispersion Modeling for both states.	Revised
3.2.10.1 Air Quality and Climate Change/ Regulatory Framework	p. 3-874	5-9	Entire Paragraph	Consult with Oregon and Idaho agencies to confirm that each state has NSPS delegated authority over standby generators.	Confirmed by BLM.
3.2.10.1 Air Quality and Climate Change/ Regulatory Framework	p. 3-877	6-8	In addition, IPC would consult with the Idaho Department of Environmental Quality regarding the need for operational permits for the small communication-site standby generator engines.	Consider whether a generator used to power the concrete batch plant, if applicable, would meet the requirements for the permit exemption and provide that Idaho Power would consult with Idaho DEQ regarding the same: "In addition, IPC would consult with the Idaho Department of Environmental Quality regarding the need for operational permits for the small communication-site standby generator engines and concrete batch plant generators."	BLM determined that this information was not necessary for the EIS.
3.2.10.5 Air Quality and Climate Change/ Environmental Consequences	p. 3-886	6-7	Transmission line and construction data supplied by IPC indicate that approximately 8 percent of the Proposed Actionis located in Idaho, with the remaining 92 percent of the Proposed Action in Oregon.	Typographic error: "Transmission line and construction data supplied by IPC indicate that approximately 8 percent of the Proposed Action is located in Idaho, with the remaining 92 percent of the Proposed Action in Oregon."	Revised
3.2.10.5 Air Quality and Climate Change/ Environmental Consequences	p. 3-886/ Table 3-260	9	Table 3-260 presents the construction emissions on a normalized yearly basis.	Explain how the estimated annual emissions were calculated and how such approach is consistent with National Ambient Air Quality Standards requirements. For example, if the construction would be staged over multiple years, how did you account for the same in your emissions calculation?	BLM determined that this information was not necessary for the EIS.

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3.2.10.5 Air Quality and Climate Change/ Environmental Consequences	p. 3-892	22-26	GHG emissions for the construction and operations for the alternatives are similar to those for the Proposed Action, with minor variations in amounts based primarily on the relative length of the line.. The maximum variation would be the Longhorn Alternative, which would produce approximately 2,600 fewer tons of GHG during construction than would the Proposed Action, an approximate 5 percent reduction.	Discuss how increases to GHG emissions may translate to climate change effects.	BLM determined that this information was not necessary for the EIS.
Section 3.2.11 Socioeconomics and Environmental Justice					
3.2.11 Socioeconomics	Entire Section	Entire Section	Entire Section	The analysis in this Section does not mention the Longhorn Substation, which is provided as a possible terminus for the Project. The Longhorn Substation should be considered and discussed in this Section.	The potential effects associated with the Longhorn Substation are assessed based on their impacts on land uses.
3.2.11.5 Socioeconomics/ Affected Environment	p. 3-917/ Table 3-278	n/a	Table 3-278. Summary of Agriculture by County and State, 2007	Suggest using more recent statistics, this data is 8 years old.	Agricultural statistics for counties and states were updated with information from the most recent Census of Agriculture (2012).
3.2.11.5 Socioeconomics/ Affected Environment	p. 3-921	24	In Idaho, Ada County ($50,909) had a median household income above the Idaho state median ($43,259; while Canyon County ($42,419) and Owyhee County ($36,670) both had median household incomes below the Idaho state median.	Close the parenthesis after "$43,259" as follows: "In Idaho, Ada County ($50,909) had a median household income above the Idaho state median ($43,259); while Canyon County ($42,419) and Owyhee County ($36,670) both had median household incomes below the Idaho state median."	Revised
3.2.11.5 Socioeconomics/ Affected Environment	p. 3-929	18	Total property taxes imposed ranged from $402 million in Owyhee County to $23 million in Ada County.	Table 3-289 suggests the amount of taxes imposed should be $402,933 or $403 million (if rounding) and not $402 million. Consider changing the sentence to read: Total property taxes imposed ranged from approximately $40~~2~~3 million in Owyhee County to $23 million in Ada County."	Revised
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-931	28-29	These estimates are for the 500-kV transmission line component of the B2H Project and do not include estimated monthly employment for the 138/69-kV rebuild or construction of the proposed Grassland Substation or modifications to the Hemingway Substation.	The Draft EIS does not include an estimate of employment and other economic impacts of constructing the terminus substation near Boardman, Oregon, and it should. Additionally, this statement does not mention the Longhorn Substation, which is provided as a possible terminus for the Project. The Longhorn Substation should be considered and discussed here.	Revised
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-933	4-11	Entire paragraph	This paragraph does not mention the Longhorn Substation, which is provided as a possible terminus for the Project. The Longhorn Substation should be considered and discussed here.	Revised
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-934	27-35	Entire paragraph	This paragraph does not mention the Longhorn Substation, which is provided as a possible terminus for the Project. The Longhorn Substation should be considered and discussed here.	Revised
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-935	2-4	Existing Idaho Power staff would be responsible primarily for the operations and maintenance (O&M) of the new transmission line and associated facilities. One additional part-time position may be filled locally. No existing employees would be required to relocate to the B2H Project area.	Consider providing a conclusion regarding the population impacts related to operations of the Project.	Revised
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-939		*[Blank]*	*[Blank]*	No comment submitted.
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-943	14-15	The school districts responded that they could to additional students.	This sentence appears to be missing a word. Consider: "The school districts responded that they could absorb the additional students."	Revised
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-945	6-7	The land for the proposed Grassland Substation is owned by Portland General Electric. Idaho Power would own a portion of the substation equipment only.	This paragraph does not mention the Longhorn Substation, which is provided as a possible terminus for the Project. The Longhorn Substation should be considered and discussed here.	Revised
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-945/ Table 3-295	n/a	Table 3-295. Number of Residences near the Proposed Action and Alternatives	Clarify how the residences are accounted for. Suggest using language similar to p. 3-993 lines 18 to 25 to reflect that some of the residences are double counted.	Revised; the discussion of effects on residential properties is based on revised structure counts.
3.2.11.6 Socioeconomics/ Environmental Consequences	p. 3-950	16 17	These impacts would be temporary and localized and are not expected to be high.	Suggest inserting a comma as follows: "These impacts would be temporary and localized, and are not expected to be high."	Revised
Section 3.2.12 Public Health and Safety					
Section 3.2.12 Public	Noise Discussion	Entire Section	Entire Section	Noise impacts from transmission line projects generally are not	Previous and recent BLM EISs prepared for 500-kV transmissions lines

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Health and Safety				considered public health or safety issues. Here, including the noise discussion of the EIS in the "Public Health and Safety" section improperly suggests that there is link between noise and public health or safety. Therefore, the noise discussion should be separated out from the Public Health and Safety section and should appear under its own subsection in Section 3.2, Resources Analyzed, of the Final EIS. Other similar BLM EIS's http://www.windeis.anl.gov/ and http://corridoreis.anl.gov/ are two examples where noise has been addressed outside of a public health context. Similarly, the EMF/Radio & TV Interference section could be consolidated into a separate "Electrical Effects" section.	have included a section on audible noise and radio noise in the public health and safety section, as they are discussed generally in the context of either a public nuisance or long term health concern. However, the section has been reorganized to better frame the issues raised during scoping and focus on pertinent regulatory framework and standards applicable to transmission lines.
3.2.12.2 Public Health and Safety/Regulatory Framework	p. 3-954	14-22, and Table 3-299	The U.S Department of Transportation has identified criteria for the assessment of short- and long-term construction activities for both stationary and mobile projects, and specifically for linear projects. FHWA recommends abatement of construction noise that exceeds maximum levels at noise-sensitive areas. These Project construction noise criteria take into account the diurnal pattern of construction activities, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. While these criteria were not developed to specifically address construction noise impact for power transmission line projects, the guidelines shown in Table 3-299 provide reasonable criteria for B2H Project construction noise assessment. If these criteria noise levels are exceeded, adverse community reaction may result.	Clarify that these guidelines (Table 3-299) are not applicable to helicopter operations.	The section pertaining to Federal Highway Administration has been removed from the text as it is not applicable to a transmission line project and BLM's assessment of noise effects.
3.2.12.2 Public Health and Safety/Regulatory Framework	p. 3-955	8-13	The FAA establishes the procedures, standards, and methodology governing the development, submission, and review of airport noise exposure maps and airport noise compatibility programs, including the process for evaluating and approving or disapproving those programs (14 CFR Part 150, Airport Noise Compatibility Planning). Part 150 prescribes single systems for—(a) measuring noise at airports and surrounding areas that generally provides a highly reliable relationship between projected noise exposure and surveyed reaction of people to noise; and (b) determining exposure of individuals to noise that result from the operations of an airport. Part 150 also identifies those land uses which are normally compatible with various levels of exposure to noise by individuals. Studies conducted by the FAA and aircraft manufacturers, such as Bell Helicopters and Sikorsky, have identified typical noise levels for helicopters in various modes. These studies develop reasonable estimates of the noise levels generated by helicopters.	The regulations at 14 C.F.R. Part 150 apply to operators of public use airports. The heliports proposed here would not be used, or intended, for public purposes, and therefore, they would not be considered public use airports subject to the provisions of 14 C.F.R. Part 150. *See* 14 C.F.R. § 150.3 (Part 150 applies to public use airports as defined in 49 U.S.C. § 47102(22), which defines the term "public use airport" as a public airport or certain private airports used or intended for public use). Consider deleting this text completely and solely reference that: "FAA has sole jurisdiction over helicopter noise and certifies varies helicopter models noise levels." Identify typical sound levels for helicopters intended to be used here. If the sound levels cannot be quantified or estimated, explain the same.	The section pertaining to FAA has been removed from the text as it was not applicable to transmission lines and BLM's assessment of noise impacts. Typical sound levels for construction equipment, including helicopters, has been estimated in this section based on previous published reference sources.
3.2.12.2 Public Health and Safety/Regulatory Framework	p. 3-956	29	26 dBA	Explain the rationale for using 26 dBA and not a different threshold as the assumed rural ambient noise level, including how that threshold contrasts, if at all, with the states' assumed level or levels. Consider discussing with the states the assumed ambient noise level or levels for such areas.	The text related to Oregon Department of Energy (ODOE) and Oregon noise regulations has been reorganized to address an overview of the ODOE process and guidelines, and does not conclude whether the B2H Project is in compliance with those regulations, as ODOE will conduct an independent analysis of the B2H Project, which is separate from the NEPA process.
3.2.12.2 Public Health and Safety/Regulatory Framework	p. 3-956	29-30	In order to determine compliance with Oregon regulations, a rural ambient noise level of 26 dBA was assumed.	It is improper for BLM to speculate whether the B2H Project would comply with Oregon's noise standards, because such a determination would be outside BLM's jurisdiction and would be speculative. BLM can acknowledge in the EIS that the B2H Project must obtain a site certificate from Oregon and Oregon will ensure the final design complies with applicable regulations through the detailed and rigorous state site certification process. However, NEPA does not require that BLM pre- judge the Project's ability to obtain such a site certificate. Instead, BLM must consider the potential environmental impact of the	The text related to ODOE and Oregon noise regulations has been reorganized to address an overview of the ODOE process and guidelines, and does not conclude whether the B2H Project is in compliance with those regulations, as ODOE will conduct an independent analysis of the B2H Project, which is separate from the NEPA process.

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				proposed action and alternatives pursuant to BLM's and not Oregon's analysis of the same. Ambient noise levels vary temporally and spatially. The Final EIS should provide that Idaho Power may conduct site-specific measurements prior to construction to determine the true ambient level at any particular site.	
3.2.12.2 Public Health and Safety/Regulatory Framework	p. 3-957/ Table 3-301	16-24	OAR 340-035-0035 Table 9 (reproduced here as Table 3-301) sets noise limits for "quiet areas," which are defined by the Oregon rules as any lands or facilities designated by the Oregon Department of Environmental Quality (ODEQ) as an appropriate area where the qualities of serenity, tranquility, and quiet are of extraordinary significance and serve an important public need. There are no ODEQ-designated "quiet areas" identified within the analysis area.	Consider omitting this paragraph, given that there are no ODEQ-designated "quiet areas" identified within the analysis area and OAR 340-035-0035 Table 9 is not applicable to the B2H Project.	The text related to ODOE and Oregon noise regulations has been reorganized to address an overview of the ODOE process and guidelines, and table has been removed.
3.2.12.2 Public Health and Safety/Regulatory Framework	p. 3-959	4	(a) Unusual and/or infrequent events;	Consider prior NEPA and other federal documents concluding that certain transmission projects would comply with Oregon's noise standards by meeting the exception for "infrequent" events. *See* Memorandum regarding Sound Level Limits for BPA Facilities (May 26, 1982) ("based on a meteorological analysis of the frequency of these rain rates (0.8-5 mm/hr), alternating current transmission lines east of the Cascades will meet this criteria"); North Steens Transmission Line Project Final EIS (Oct. 2011) , App'x C at C/21 ("Based on hourly precipitation records near the route of the proposed transmission line, such conditions are expected to occur about 7% of the time during the year in the North Steens area."); Big Eddy-Knight 500-kV Project, Final EIS Vol. 2 (July 2011), App'x E at 21 (describing frequency of foul weather events as 1 % of the year based on meteorological data); Klondike III/Biglow Canyon Wind Integration Project, Final EIS (Sept. 2006), App'x C at 20 (describing frequency of foul weather events as 6% of the year based on meteorological data); McNary- John Day Transmission Project, Draft EIS (Feb. 2002), App'x G at 18 (describing frequency of foul weather events as 1 % of the year based on meteorological data).	The ODOE text has been revised accordingly to clarify issue.
3.2.12.4 Public Health and Safety/Methodology	p. 3-962	6	The difference in sound levels is the sound level impact created by the B2H Project.	In determining the impact, if any, of a change in sound level, BLM should consider the variability of the relevant ambient sound level and the ability of the receptor to discern the change in sound level. For example, the WWEC Programmatic EIS stated: "In arid regions of the 11 western states, corona- generated audible noise would occur infrequently, as most of the areas adjacent to the proposed corridors on federal lands are undeveloped and sparsely populated. Whether occurring on federal or nonfederal land, corona noise would be scarcely discernible within ¼ mile or less from the center of the nearest transmission tower." (page 3-143 at http://corridoreis.anl.gov/).	Deleted to simplify section for general public.
3.2.12.4 Public Health and Safety/Methodology	p. 3-962	6-8	IPC conducted an inventory of existing ambient sound levels at approximately 730 identified receptors along the Proposed Action and alternative routes.	Idaho Power monitored the ambient sound levels at 39 locations, which were determined to accurately represent all other Noise Sensitive Receptors across the study area. Suggest rewording to: "IPC conducted an inventory of existing ~~ambient sound levels at approximately~~ structures along the Proposed Action and alternatives that were potentially noise sensitive receptors. There were 730 ~~identified receptors along the Proposed Action and alternative routes~~ such structures identified within the study area. Idaho Power conducted ambient sound monitoring at 39 of those structure locations, which were determined to accurately represent the Noise Sensitive Receptors across the study area."	Revised
3.2.12.4 Public Health and Safety/Methodology	p. 3-962	10-38	A total of 87 noise-sensitive receptors were identified along the Proposed Action, and 29 receptors were identified along the alternatives. (et seq. through end of page)	Clarify that certain changes may be made to project features as set forth in the Construction POD which would not alter the noise impact conclusions. Provide examples of such changes—e.g., structure type changes, different access road locations, changes to many component parts used on the line.	The Draft EIS text has been deleted.
3.2.12.5 Public Health and Safety/Affected	p. 3-964	16-17	IPC conducted an inventory of existing ambient sound levels at approximately 730 identified potential	Suggest rewording to "IPC conducted ~~an inventory of existing ambient sound levels at approximately 730 identified potential NSR~~ ambient	Revised

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Environment			NSR along the proposed route and alternative routes.	sound monitoring at 39 identified receptors along the proposed route and alternative routes." There were 730 potential Noise Sensitive Receptors within the study area and 39 locations were selected to be monitored where it was possible that the ambient degradation standard might be exceeded.	
3.2.12.5 Public Health and Safety/Affected Environment	p. 3-964	16-18	IPC conducted an inventory of existing ambient sound levels at approximately 730 identified receptors along the proposed route and alternative routes. The location of the receptors, distance from the right- of-way, receptor types, and measured ambient noise levels at each receptor are presented in Table B.11-1 in Appendix B.11.	This should read "IPC ~~conducted an inventory of existing ambient sound levels at approximately~~ identified 730 ~~identified~~ potential Noise Sensitive Rreceptors along the proposed route and alternative routes, and monitored 39 represenative examples of those potential NSRs. The location of the potential NSRs, distance from the right-of-way, receptor types, and measured ambient noise levels at ~~each potential NSR~~ the representative examples are presented in Table B.11-1 in Appendix B.11." The Baseline Sound Monitoring Protocol set forth as Attachment X-3 to Idaho Power's Preliminary Application for Site Certificate describes the methods used by Idaho Power to identify the 730 potential NSRs and the 39 representative samples that were then monitored. Consider citing the Protocol for the methods used to support the EIS analysis.	The Draft EIS text has been deleted.
3.2.12.6 Public Health and Safety/ Environmental Consequences	p. 3-967	28-30	Sixteen noise-sensitive receptors have been identified as located within 1,000 feet of the right- of-way for the Proposed Action; one for the Horn Butte Alternative; one for the Longhorn Alternative; and two for the Flagstaff Alternative.	Clarify that the number of receptors may fluctuate as a result of project design and layout changes made between the issuance of the ROD and the final Construct POD.	Revised
3.2.12.6 Public Health and Safety/ Environmental Consequences	p. 3-969	8-10	Transmission line construction in the proximity of any single location would likely last a few days to one week, as construction activities move along the corridor.	Clarify that construction activities may occur longer than one week if exigent circumstances arise. Additionally, staging sites may be active for more than one week. Consider the following change: "Transmission line construction in the proximity of any single location on the transmission line would likely last a few days to one week, as construction activities move along the corridor, barring exigent circustances. Staging areas may be active for several weeks."	Revised
3.2.12.6 Public Health and Safety/ Environmental Consequences	pp. 3-969 to 3-970	3-969 line 27; 3-970 lines 1-2	The detonations are timed so the energy from individual detonations destructively interferes with each other, called wave canceling. As a result, very little kinetic energy is wasted as ground vibration and audible noise.	Provide a citation for this information.	The text has been deleted from the section. Sound levels for implosive devices is an unnecessary level of detail for analysis--scoping comments did not reach this level of minutea and text has been revised accordingly.
3.2.12.6 Public Health and Safety/ Environmental Consequences	p. 3-971	5-6	An average sound-level measurement between 118 and 122 dBA at an approximate distance of 200 feet was reported (Pasini 2006).	The reference (http://implo.burndy.com/docs/librariesprovider8/pdf/new-implosive-connector-technology-for-high-voltage-conductors.pdf?sfvrsn=4) was reviewed, but it does not appear to indicate the sound level noted in the Draft EIS. Identify the text in the Pasini 2006 reference materials that supports the average-sound level measurements, or provide a different citation.	The text has been deleted from the section. Sound levels for implosive devices is an unnecessary level of detail for analysis--scoping comments did not reach this level of minutea and text has been revised accordingly.
3.2.12.6 Public Health and Safety/ Environmental Consequences	p. 3-971	11-25	The fly yards would be approximately 10 to 15 acres and sited at locations to permit a maximum fly time of 4 to 8 minutes to reach structure locations, typically at about 10-mile intervals. In addition to limited flight time, helicopter operations would be limited to daytime working hours.	This text states that helicopter operations would be limited to 8 minutes in duration. However, flight requirements are dependent on final construction design and layout, and may be involve flight times greater than 8 minutes. Clarify the same: "The fly yards would be approximately 10 to 15 acres and sited at locations to permit ~~a maximum fly time of 4 to 8 minutes~~ access to ~~reach~~ structure locations, typically at about 10-mile intervals. In addition to limited flight time, helicopter operations would be limited to daytime working hours. Final flight requirements will be determined in the construction POD based on engineering and other considerations."	The text has been deleted from the section. Sound levels for implosive devices is an unnecessary level of detail for analysis--scoping comments did not reach this level of minutea and text has been revised accordingly.
3.2.12.6 Public Health and Safety/ Environmental Consequences	p. 3-973	20-23	Shunt reactors contain components similar to power transformers but noise from shunt reactors is generated primarily from vibrational forces resulting from magnetic "pull" effects at iron-air interfaces. Also, unlike transformers, operation of shunt reactors is typically intermittent, operating when voltage stabilization is needed during load variation.	Consider identifying the range in sound levels for the shunt reactors proposed here.	The text has been deleted from the section. Scoping comments did not reach this level of minutea and text has been revised accordingly.
3.2.12.6 Public Health and Safety/ Environmental Consequences	p. 3-973	30-35	The ambient noise inventories and operations noise modeling suggest that 63 noise-sensitive receptors in the Proposed Action analysis area could experience project-related operational noise at noticeable levels (10 dBA above assumed rural ambient of 26 dBA, or	Idaho Power agrees that the operational noise along the right-of-way would be low or indiscernible. Consider adding a statement providing that the CAFE modeling and WWEC EIS analysis support BLM's finding of low noise impacts.	The text has been revised to match analysis the numbers and suggested text rewording.

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			over 50 dBA). Of these, two noise-sensitive receptors could experience operational noise levels above the 50 dBA limit set by Oregon noise rules. IPC may be required in the EFSC process to propose means to abate noise levels that exceed state noise rules. Overall, operational noise along the right-of-way would be low.		
Section 3.3 Cumulative Effects					
3.3.1 Cumulative Effects/Definition	p. 3-997	11-12	Cumulative impact as defined in Code of Federal Regulations is "…the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions regardless of what agency (Federal or non-Federal) or person undertakes such actions.	Typographical error: "Cumulative impact as defined in Code of Federal Regulations is "…the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions ~~regardless of what agency (Federal or non-Federal) or person undertakes such actions~~."	Revised
3.3.2 Cumulative Effects/Methodology	p. 3-997	n/a	n/a	Provide additional quantification and assessment of impacts for the cumulative analysis. For example, the vegetation analysis for segment 2 concludes that "the potential for expansion of present actions would have a major cumulative effect on vegetation communities in Segment 2," but it provides no quantification of impacts. As another example, the EIS states "[t]imber management activities, wildland fire and insect damage could contribute to cumulative effects in the B2H Project area." However, the document fails to mention how and in what manner this would occur or explain why BLM cannot provide that information. BLM should provide additional quantification and assessment of cumulative impacts; where quantification of impacts is not feasible, BLM should explain its rationale for not providing the same.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. The effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.2 Cumulative Effects/Methodology	p. 3-997	n/a	n/a	SageCon and the State of Oregon agencies are developing a sage-grouse conservation plan and regulatory mechanisms. Consider in the Final EIS any final or pending changes to state regulations or county land use plans regarding sage-grouse planning and regulation.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Impact analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-998	5-6	The temporal scope of the cumulative effects analysis is the duration of the life of the B2H Project, including construction, and operation.	Clarify that the temporal scope of the cumulative effects analysis covers short-term, long-term, and permanent impacts as those terms are defined in Section 3.1.2.1: "The temporal scope of the cumulative effects analysis is the duration of the life of the B2H Project, including ~~construction, and operation~~ short-term, long-term, and permanent impacts."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Impact analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-998	6-11	The temporal scope includes consideration of short-term and long-term effects. Short-term effects cease following an activity of specific duration (such as facility construction) or result in conditions that are capable of being restored to pre- project functionality within a relatively short amount of time. For purposes of this Draft EIS, the timeframe for short-term effects is 3 years, based on a 3-year construction schedule and 6 months for post-construction reclamation. Long-term effects are a result of ongoing activities or impacts that persist for long periods of time.	Six months is not a sufficient timeframe for ground-disturbance reclamation and restoration projects to become established. For example, for re-seeding projects, six months does not constitute even one growing season, making it unlikely that the results of the project will become apparent in that time. Consider using 5 years following construction as the measure for short-term impacts in order to allow reclamation and restoration projects to become established and return the affected environment to pre- construction conditions. The five year timeframe would allow a more accurate representation of the impacts that would be temporary and related to construction, and the long-term impacts that would endure for the life of the project. Consider changing the definition of short-term and long-term impacts as follows: "In this analysis, temporary environmental effects predicted to occur during Project construction that would be anticipated to return to a preconstruction condition at or within 5 years of the end of construction were considered short-term impacts. Environmental effects that would be anticipated to remain for the life of the Project were considered long-term impacts." *See* Sigurd to Red Butte No. 2 345-kV Transmission Project Final EIS at 3-15 (Oct. 2012) (using substantially the same definition of short-term and long-term impacts, including the 5-year post-construction timeframe).	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.2.1 Cumulative Effects/Methodology/	p. 3-998	14-15	Permanent effects for the B2H Project would be those persisting longer than 50 years.	Be consistent in how BLM defines "permanent" impacts. In Section 3.1.2.1, permanent impacts are defined as those that "would persist	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were

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Scope of Analysis				even after project operations cease and decommissioning is completed." The definition here defines it as any impact occurring longer than 50 years, regardless of when the project ceases and is decommissioned. To be consistent, consider using one definition for permanent impacts—i.e., those that "would persist even after project operations cease and decommissioning is completed."	contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-999/ Table 3-313	n/a	Vegetation Resources	The Cumulative Impact Analysis Areas for general vegetation, noxious weeds, and special status species are the same as analysis areas for Chapter 3 direct and indirect impacts. Provide rationale as to why these analysis areas should be exactly the same.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-999/ Table 3-313	n/a	Vegetation Resources	The use of county boundaries for noxious weeds is inappropriate. The area should be based on the potential to intersect or contribute to noxious weed occurrences and not political regulations.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-999/ Table 3-313	n/a	Rationale for Area	Change column header from "Rationale for Area" to "Rational for Analysis Area."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Wildlife Resources	The wildlife resources categories set forth in the table do not match the categories set forth in the wildlife resources section of Chapter 3. For instance, there is no category in the wildlife resources section for mammals. Table 3-13 does not include special status species. It's unclear if "migratory birds" refer to migratory birds, raptors, or both. Consider using in this table the same categories set forth in the wildlife resources section of Chapter 3. Present the wildlife resources in the order and by the name that they have been presented in the document. It is fine if more than one analysis area is defined for the resource (i.e., Migratory Birds and Raptors = 10 miles for bald and golden eagles, 0.5 mile for all others).	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Setion 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Big Game Cumulative Impact Analysis Area	Define "herd unit areas" as this table entry is the only place the term is used in Chapter 3. Parturition habitat isn't typically delineated (other than a few elk calving areas identified by USFS/RMEF) by any of the permitting agencies, inclusion in the Analysis Area without any geographic extent is not useful. Recommend removal of the term parturition in defining analysis areas.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Big Game Rationale for Area	Define the term "critical stress."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Mammals Cumulative Impact Analysis Area	This Analysis Area appears to be the same as the Analysis Area for the direct and indirect impacts. Is this intentional? How much area does within 50 feet of access road centerlines add to the Analysis Area given a vast majority of access roads are within 0.5 mile of the centerline?	The Final EIS has been revised to provide more detailed analysis related to cumulative effects.
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Potential habitat for affected mammals would be within 0.5 miles of the direct and indirect effects areas.	Explain what is meant by this statement. If the indirect effects are said to occur out to 0.5 mile based on the Analysis Area for direct and indirect effects, then is this saying that the Cumulative Analysis Area should be another 0.5 mile beyond that (essentially areas within 1 mile [2-mile wide corridor] of the centerlines?	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Amphibians and reptiles Rationale for Area	Explain the definition of "Potential Habitat" and BLM's rationale for relying on the same for defining the Analysis Area. Explain if and why BLM provided an apparent 10-mile-wide Analysis Area for direct and indirect impacts.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Sage-grouse Cumulative Impact Analysis Area	Explain and define "restoration habitat." How does it relate to PPH and PGH? How would the areas within 11 miles of leks that are within 5 miles of the Project add to the analysis area? Are not all leks and suitable habitat encompassed by the Core Area Approach utilized in designation of PPH/PGH? Provide a citation for the 5mi/11mi method if maintained as part of the Analysis Area.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.2.1 Cumulative	p. 3-1000/ Table	n/a	Sage-grouse Rationale for Area	PPH and PGH are BLM designated habitat, ODFW and IDFG may	The Final EIS has been revised to provide more detailed analysis of

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Effects/Methodology/ Scope of Analysis	3-313			have been cooperators in the designation but the BLM published those data. Change "BLM Instructional Memorandum" to "BLM Instruction Memorandum" and provide a citation.	potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Washington ground squirrel Rationale for Area	Provide citation for reference materials supporting BLM's conclusion that "[p]otential habitat for affected animals would be within 5 miles of the project centerlines." Documented ground squirrel dispersal events in the Boardman area range from 40-3,521 meters (just over 2 miles) [From Klein, Kimberly. 2005. *Dispersal Patterns of Washington Ground Squirrel in Oregon*]. Therefore, it seems unlikely that individuals affected by the Project would utilize habitat 5 miles away or that individuals that are 5 miles from the Project would be impacted. Explain BLM's 5-mile habitat analysis area in light of this scientific information.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.2.1 Cumulative Effects/Methodology/ Scope of Analysis	p. 3-1000/ Table 3-313	n/a	Migratory Birds and Bald and Golden Eagle Rationale for Area	Provide citation for reference materials supporting BLM's conclusion that the two Analysis Areas cover a "[r]easonable distance beyond which construction or operations of this or other projects is unlikely to disturb nesting birds."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.3 Cumulative Effects/Potential Actions	p. 3-1004	5-6	Those projects most likely to cause cumulative effects are those that have effects similar to those of the B2H Project since they tend to impact all the same resources across multiple jurisdictions in ways similar to those of the B2H Project.	It is highly unlikely that projects, even similar projects, impact "all" of the same resources. Consider: "Those projects most likely to cause cumulative effects are those that have effects similar to those of the B2H Project since they tend to impact ~~all~~ the same or similar resources across multiple jurisdictions in ways similar to those of the B2H Project."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative Effects/Potential Actions/ Past and Present Actions	p. 3-1004/ Table 3-314	n/a	Potential Effects Similar to B2H Project	Effects listed seem to focus on veg/wildlife habitat, with an occasional air quality, noise, and visual effect. What about socio-economic and cultural effects? All of the actions listed are economically driven.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative Effects/Potential Actions/ Past and Present Actions	p. 3-1005/ Table 3-314	Transmission Lines	Name of Action: High-voltage transmission lines crossed by or parallel to the Proposed Action and alternatives/Description: The transmission lines in the analysis area vary from 69V to 500kV. Several high-voltage transmission lines carry electricity from hydroelectric generation stations near Boardman, Oregon to interconnection points in Idaho	The use of "analysis area" here is inappropriate, as the analysis area varies by resource (as listed in Table 3-313). The text "Several high-voltage transmission lines carry electricity from hydroelectric generation stations near Boardman, Oregon to interconnection points in Idaho" can be removed; it does not apply and the electricity is carried both to and from Oregon from Idaho.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative Effects/Potential Actions/ Past and Present Actions	p. 3-1005/ Table 3-314	Roads and Linear Projects	Description: The average existing road density in the analysis area is 1.6 miles per square mile.	The use of "analysis area" here is inappropriate, as the analysis area varies by resource (as listed in Table 3-313).	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 CumulativeEffects/ Potential Actions/ Past and Present Actions	p. 3-1005/ Table 3-314	Roads and Linear Projects	Under "Pipelines" the Description reads "Proposed Action has Twenty six pipeline crossings"	Suggest rewording the description to "pipeline crossings."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative Effects/Potential Actions/ Past and Present Actions	p. 3-1006/ Table 3-314	n/a	Naval Weapons System Training Facility Boardman (including avigation easements)	Correct the spelling of "avigation."	The Final EIS has been revised to provide more detailed analysis or potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential ffects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative Effects/Potential Actions/Past and Present Actions	p. 3-1009-1011/Figure 3-70, 3-71, and 3-72	n/a	n/a	Show existing t-lines by Segment or include Segment break points on these figures. Be consistent in the approach to sectioning off (Segment analysis approach) the Project. Introducing the Project's geographic extent as Boardman to Brodie, Brodie to Weatherby, and Weatherby to Melba at this point in the analysis is inconsistent.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative	p. 3-1012	2-3	Several high-voltage transmission lines carry	The text "Several high-voltage transmission lines carry electricity from	The Final EIS has been revised to provide more detailed analysis of

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Effects/Potential Actions/ Past and Present Actions			electricity from hydroelectric generation stations near Boardman, Oregon to interconnection points in Idaho	hydroelectric generation stations near Boardman, Oregon to interconnection points in Idaho" can be removed; it does not apply and the electricity is carried both to and from Oregon from Idaho.	potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative Effects/Potential Actions/ Past and Present Actions	p. 3-1012	20-21	The average existing road density in the analysis area is 1.6 miles per square mile.	The use of the phrase "average existing road density in the analysis area is 1.6 mi/mi2" is pulled from the fish resources analysis area (very large area, 105 subwatersheds). However, the potential effects to be discussed are to habitat fragmentation and limitations on wildlife movement (and air and noise). This is not an apples to apples comparison. Explain how these issues relate and the justification for this approach.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.1 Cumulative Effects/Potential Actions/ Past and Present Actions	p. 3-1013	14	cumulative effects analysis area	Cumulative effects analysis areas are defined by resource in Table 3-313; which resource analysis area is this referring to?	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.2 Cumulative Effects/Potential Actions/ Reasonably Foreseeable Future Actions	p. 3-3014	24	actionse	Typo, correct to "actions."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.2 Cumulative Effects/Potential Actions/ Reasonably Foreseeable Future Actions	p. 3-3014	32	that may have effects to resources in the cumulative effects analysis area	Cumulative effects analysis areas are defined by resource in Table 3-313, there is not one cumulative effect analysis area for the project. Correct to "that may have effects to resources in their respective cumulative effects analysis area."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.2 Cumulative Effects/Potential Actions/ Reasonably Foreseeable Future Actions	p. 3-3015/Table 3-315	n/a	n/a	Would be useful to provide figure(s) showing location of projects relative to B2H and time frame for projects. Neal Hot Springs Geothermal is included as a reasonably foreseeable project, but this is a completed project. Gateway West is included, but the only common component is the Hemingway Substation. It would be more appropriate to include the substation and not the entire Gateway West project. The Footprint column alternates between providing information on the footprint and the location of the project. Explain how projects were selected to be included in the table. What distance between the Proposed Action and alternatives was used to determine if a project should be included in the table and analysis? A discussion of screening criteria should be provided. A quick look at the ODOE-EFSC website shows, for example, the Wheatridge Wind Energy Facility that appears to be in the B2H project vicinity, but is not included in the analysis. The Boardman Power Plant is currently planned to be decommissioned as a coal-fire plant.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.2 Cumulative Effects/Potential Actions/Reasonably Foreseeable Future Actions	p. 3-1019	1	Naval Weapons System Training Facility Boardman	Why does this RFFA warrant more detail by being put in-text and not in the Table? Most of the Actions listed in Table 3-315 are complex enough that their descriptions could be expanded such that the tabular format would not be best presentation of information. Recommend including the Navy DEIS in the table by shortening the description.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.3.3 Cumulative Effects/Potential Actions/ Plan Revisions	p. 3-1020	15	Land Management Plan Revisions	Provide a narrative on how these Plan Revisions are incorporated into the Cumulative Effects analysis. Would these Plan Revisions be considered RFFAs and therefore should be included under Section 3.3.3.2?	Revised
3.3.3.3 Cumulative Effects/Potential Actions/	p. 3-1020	15	Land Management Plan Revisions	For certain of the proposed RMP or LRMP amendments, the Draft EIS discusses the preferred alternative in more detail than the other	This discussion has been revised based on BLM direction.

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Plan Revisions				alternatives. Each preferred alternative set forth in the RMP amendment Draft EISs is not a final agency decision and is one alternative among many alternatives. Explain why the preferred alternatives are discussed in more detail than the other alternatives.	
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1025	26	METHODOLOGY	This is a malapropism. The correct term is METHODS.	Revised
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1025	27-31	The geographic area of influence for the analysis of cumulative impacts to water resources is defined as the watersheds (4th level HUCs) of waterbodies crossed by the Proposed Action and alternatives. The area of influence for analysis of cumulative impacts to wetlands is defined as mapped wetland and riparian areas up to 0.5 miles from the Proposed Action or alternatives and within 50 feet of the centerline of access roads.	This definition of the area of influence for analysis differentiates between water resources and wetlands. Wetlands are water resources so there should be a single definition of the area of influence. This is readily apparent when considered in the context of connectivity, such as the use of connectivity to establish jurisdiction for waters of the US. Consider using the same parameters for defining the area of influence for water resources and wetlands.	Comment noted
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1026	8-9	The levels of direct, indirect, and cumulative impacts are categorized as high, moderate, or low based on the thresholds defined in Section 3.2.2, Water Resources.	Because the categories (high, moderate, low) defined in Section 3.2.2 are not defined in terms that allow them to be differentiated from each other (there are no quantified thresholds), the levels of impact described in the subsequent analysis in this section, are illusory. Further, the "definitions" in Section 3.2.2 are temporal—e.g., one definition of "low" is "[p]roject activities that result in infrequent periodic increases in sedimentation to nearby surface-water resources." This definition is based on the temporal nature ("periodic") of the increased sedimentation, not on the quantity of sediment. However, the determination of cumulative effects in this section 3.3.4 are based on the quantity of sediment (e.g. "increase of sedimentation" in line 16, p. 3-1027). Therefore, the determinations of cumulative effect in this section appear to be not consistent with the definitions of the categories in Section 3.2.2. Explain the apparent discrepancy or address it accordingly.	The Final EIS uses a quantitative analysis for water resources. The impact levels are not being used for the cumulative effects assessment.
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1026	14	The evaluation of cumulative impacts to water resources addresses surface water and wetlands.	While lines 27-31 on the previous page incorrectly differentiate between "water resources" and "wetlands," this sentence implies that wetlands (along with surface waters) are a subset of water resources. This is correct, but it makes increasingly unclear what is meant by "water resources" on the previous page.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1026	16-21	With effective implementation of design features incorporated as conditions of the ROW grant, adverse effects on groundwater are anticipated to be negligible as a result of the Proposed Action and alternatives. Therefore, there would be no contribution to groundwater cumulative impacts since there are no direct impacts from the Proposed Action and alternatives within the geographic area of influence. Groundwater cumulative impacts are not discussed any further in this section.	See comment for page 3-67 regarding shallow groundwater. Re-analysis of shallow groundwater in the analysis area may necessitate discussion of effects to groundwater.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1028	14-19	However, the Proposed Action and present actions would be required to comply with the Clean Water Act, which would require any proposed actions to avoid and minimize any impacts to wetlands to the extent feasible as well as providing compensatory mitigation where impacts were unavoidable. With avoidance as feasible and compensatory mitigation where avoidance is not feasible, effects to wetlands are anticipated to be low.	In Section 3.2.2 Table 3-25, the only definition that rates as low impact to wetlands is short-term disturbance. The potential impacts discussed in 3.3.4.2 include impacts requiring compensatory mitigation, which is required of long-term (permanent, or operational) impacts. Therefore this finding of low impact is not consistent with the definition in Section 3.2.2.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1029	22-27	There are no effects to surface water drinking water source areas by the Proposed Action or the Glass Hill Alternative because there are no source areas identified in the area where the Proposed Action or the Glass Hill Alternative are proposed. The potential the effects to surface water drinking water source areas from present actions such as grazing and land development would be considered to be low impact because of the implementation of standard regulatory measures to minimize erosion and sedimentation.	This text first states that there are no drinking water source areas "in the area where the Proposed Action or the Glass Hill Alternative are proposed." This should be the defined analysis area (page 3- 1025, Methodology, lines 27-32). The statement of no drinking water source areas being present is followed in lines 24-27 with a statement that impacts to surface water drinking water source areas would be caused by grazing and land development, and would be low impact. If there are no surface drinking water source areas in the analysis area, there would not be any impact to them. Explain the apparent discrepancy.	Revised

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3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1029	25	The potential the effects…	"The potential the effects" should be "The potential ~~the~~ effects."	Revised
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1029	28-30	Therefore, the direct and indirect short-term impacts to surface waters from the Proposed Action and Glass Hill Alternative would contribute incrementally to a low adverse cumulative impact to surface water resources, due to increase of sedimentation to nearby surface-water resources.	Determination of impact is inconsistent with the definition in Section 3.2.2 Table 3-25. Definitions in the table are based on temporal impacts. This determination is based on quantity of impact.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1030	2-4	Therefore, the direct and indirect short-term impacts to wetlands from the Proposed Action and present actions would contribute incrementally to a low adverse cumulative impact to wetlands within the geographic area of influence within Segment 2.	In Section 3.2.2 Table 3-25, the only definition that rates as low impact to wetlands is short-term disturbance. This finding of impact includes other contingencies, including compliance with the regulatory process. Therefore this finding of low impact is not consistent with the definition in Section 3.2.2.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1030	22	The potential the effects…	"The potential the effects" should be "The potential ~~the~~ effects."	Revised
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1030	22-25	The potential the effects to surface water drinking water source areas from present actions such as grazing and land development would be considered to be low impact because of the limited surface water drinking water source areas located within Baker and Union counties.	Counties are not defined as analysis areas.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1030	26-28	Therefore, the direct and indirect short-term impacts to surface waters from the Proposed Action and present actions would contribute incrementally to a low adverse cumulative impact to surface water resources.	Table 3-25 in Section 3.2.2 has two criteria for a determination of low impact. This finding is not consistent with either of them.	Comment noted; the criteria have been clarified.
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1030	32-34	Therefore, the incremental effect of the construction and operation of Flagstaff and Burnt River Mountain alternatives when added to the present actions would be a low adverse cumulative impact on surface waters.	Table 3-25 in Section 3.2.2 has two criteria for a determination of low impact. This finding is not consistent with either of them, and doesn't identify what the reasons are for the determination.	Comment noted; the criteria have been clarified.
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1031	6-9	There are no effects to surface water drinking water source areas by the Timber Canyon because there are no source areas that would be disturbed. The potential the effects to surface water drinking water source areas from present actions would be considered to be low impact because of the limited surface water drinking water source areas located within Baker and Union counties.	This text first states that there are no surface water drinking water source areas that would be disturbed. Then there is a sentence structure error ("The potential the effects") which is propagated multiple times throughout this section. This is followed by a determination of low impact to the surface water drinking water source areas (although none are present) in Baker and Union counties, but counties are not defined as analysis areas. Explain the apparent discrepancy.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1031	10-13	Therefore, the direct and indirect short-term impacts to surface waters from the Timber Canyon and present actions would contribute incrementally to a moderate adverse cumulative impact to surface water resources, due to greater exposure to the risk of adverse water quality effects on surface waters with over a 100 stream crossings.	The determination of a moderate adverse impact is inconsistent with the criteria defined in Table 3-25 in Section 3.2.2. The table has two criteria to describe moderate impact; exposure to risk of adverse water quality is not one of them.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1031	20-24	However, the Proposed Action and present actions would be required to comply with the Clean Water Act and potential effects to wetlands are anticipated to be low. Therefore there would be incremental contribution to a low adverse cumulative impact to wetlands from the Proposed Action and present actions within the geographic area of influence within Segment 3.	In Section 3.2.2 Table 3-25, the only definition that rates as low impact to wetlands is short-term disturbance. This finding of impact includes other contingencies, including compliance with the regulatory process. Therefore this finding of low impact is not consistent with the definition in Section 3.2.2.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1032	14-21	There are no effects to surface water drinking water source areas by the RFFAs or the Proposed Action because there are no source areas identified within the geographic area of influence in Segment 4. The potential the effects to surface water drinking water source areas from present actions such as grazing and land development would be considered to be low impact because of the limited surface water drinking water source areas located within Baker and Malheur counties. Therefore, the direct and indirect short-term	This text first states that there are no surface water drinking water source areas that would be disturbed. Then there is a sentence structure error ("The potential the effects") which is propagated multiple times throughout this section. This is followed by a determination of low impact to the surface water drinking water source areas (although none are present) in Baker and Malheur counties, but counties are not defined as analysis areas. The final determination of low adverse cumulative impact does not identify which criterion in Table 3-25 is the basis for the determination. Explain the apparent discrepancy.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).

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			impacts to surface waters from the Proposed Action, present actions, and RFFAs would contribute incrementally to a low adverse cumulative impact.		
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1032	25-27	Therefore, the incremental effect of the construction and operation of Tub Mountain South and Willow Creek alternatives when added to the past, present, and RFFAs would be a low adverse cumulative impact on surface waters.	This determination does not explain which criterion in table 3-25 is the basis for the determination of low adverse cumulative impact.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1032, 1033	37; 1-4	However, the Proposed Action and present actions would be required to comply with the Clean Water Act and potential effects to wetlands are anticipated to be low as a result of the regulatory process. Therefore, the direct and indirect short-term impacts to wetlands from the Proposed Action and present actions would contribute incrementally to a low adverse cumulative impact to wetlands.	In Section 3.2.2 Table 3-25, the only definition that rates as low impact to wetlands is short-term disturbance. This finding of impact includes other contingencies, including compliance with the regulatory process. Therefore this finding of low impact is not consistent with the definition in Section 3.2.2.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1033	9-14	Potential impacts from present actions would likely be similar to the alternatives' effects and would be considered to be low even with compliance with the Clean Water Act because it is unlikely that all impacts can be mitigated completely. Therefore, the direct and indirect short-term impacts to wetlands from the Willow Creek and Tub Mountain South alternatives and present actions would contribute incrementally to low adverse cumulative impacts to wetlands.	In Section 3.2.2 Table 3-25, the only definition that rates as low impact to wetlands is short-term disturbance. This finding of impact includes other contingencies, including compliance with the regulatory process. Therefore this finding of low impact is not consistent with the definition in Section 3.2.2. The phrase "it is unlikely that all impacts can be mitigated completely" implies that mitigation will not compensate for wetland impacts. Clean Water Act Section 404 permitting is contingent upon mitigation to compensate for all impacted wetland functionality.	Comment noted. Reference to effects and compensatory wetland mitigation has been clarified.
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1033	26-33	There are no effects to surface water drinking water source areas by the RFFAs or the Proposed Action because there are no source areas identified within the geographic area of influence in Segment 5. The potential the effects to surface water drinking water source areas from present actions such as grazing and land development would be considered to be low impact because of the limited surface water drinking water source areas located within Malheur County. Therefore, the direct and indirect short- term impacts to surface waters from the Proposed Action, present actions, and the two RFFAs would contribute incrementally to a low adverse cumulative impact.	This text first states that there are no surface water drinking water source areas that would be disturbed. Then there is a sentence structure error ("The potential the effects") which is propagated multiple times throughout this section. This is followed by a determination of low impact to the surface water drinking water source areas (although none are present) in Malheur County, but counties are not defined as analysis areas. The final determination of low adverse cumulative impact does not identify which criterion in table 3-25 is the basis for the determination. Explain the apparent discrepancy.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1034	1-5	Construction activities and ground disturbance associated with the two alternatives, present actions and the two RFFAs could result in localized impacts to surface water with the potential increase of erosion and sedimentation, with effects extending downstream. Therefore, the incremental effect of the construction and operation of Malheur S and Malheur A alternatives when added to the past, present, and RFFAs would be a moderate adverse cumulative impact on surface waters.	In Table 3-5 the criterion for moderate impact to surface water is short-term increase in sedimentation. This finding of moderate impact is inconsistent with that criterion because it is based on erosion in addition to sedimentation, and on the spatial distribution (downstream) of the effects, rather than the temporal effect (short-term) identified in the table.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1034	8-11	The Double Mountain Alternative would create approximately 12 stream crossings. Therefore, the incremental effect of the Double Mountain Alternative when added to the present actions, Huntington Windfarms, and Grassy Mountain Gold Mine effects would be a low adverse cumulative impact on surface waters.	This finding of low impact is apparently based on the number of stream crossings, not on criteria in Table 3-25.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1034	20-26	However, the Proposed Action and present actions would be required to comply with the Clean Water Act and potential effects to wetlands are anticipated to be low as a result of the regulatory process. The construction of the two RFFAs would not result in either short- or long-term impacts because there are no wetlands identified within 500 feet of the future actions within the geographic area of influence in	In Section 3.2.2 Table 3-25, the only definition that rates as low impact to wetlands is short-term disturbance. This finding of impact includes other contingencies, including compliance with the regulatory process. Therefore this finding of low impact is not consistent with the definition in Section 3.2.2.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).

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			Segment 5. Therefore, the direct and indirect short-term impacts to wetlands from the Proposed Action and present actions would contribute incrementally to a low adverse cumulative impact to wetlands.		
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1034	30-35	Potential impacts from present actions would likely be similar to the alternatives' effects and would be considered to be low even with compliance with the Clean Water Act because it is unlikely that all impacts can be mitigated completely. Therefore, the direct and indirect short-term impacts to wetlands from the Malheur S and Malheur A alternatives and present actions would contribute incrementally to low adverse cumulative impacts to wetlands.	In Section 3.2.2 Table 3-25, the only definition that rates as low impact to wetlands is short-term disturbance. This finding of impact includes other contingencies, including compliance with the regulatory process. Therefore this finding of low impact is not consistent with the definition in Section 3.2.2. The phrase "it is unlikely that all impacts can be mitigated completely" implies that mitigation will not compensate for wetland impacts. Clean Water Act Section 404 permitting provides for mitigation to compensate for all impacted wetland functionality.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1035	13-15	Therefore, the direct and indirect short-term impacts to surface waters from the Proposed Action, present actions, and the two RFFAs would contribute incrementally to a moderate adverse cumulative impact with over 80 streams potentially affected.	This finding of low impact is apparently based on the number of stream crossings, not on criteria in Table 3-25.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1035	19-21	Specific information on wetlands in Owhyee County for the geographic area of influence for the cumulative analysis is not available.	National Wetlands Inventory data is available for Owyhee county. It should be analyzed on the same basis as data were analyzed in Oregon. "Owhyee" is misspelled.	Comment noted. National Wetlands Inventory data have been used for the wetlands analysis for the Final EIS.
3.3.4.2 Cumulative Effects Analysis/Water Resources	p. 3-1035	19-22	Specific information on wetlands in Owhyee County for the geographic area of influence for the cumulative analysis is not available. However, the incremental effects of the Proposed Action along with present actions and the Gateway West project is anticipated to be a low adverse cumulative impact on forested wetlands.	The determination of low impact on forested wetlands is speculative as to both the degree of impact and the type of wetland impacted, as it is unsupported by any data. The determination does not specify which criterion in Table 3-25 was used to reach the conclusion.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects (Section 3.3).
3.3.4.3 Cumulative Effects Analysis/ Vegetation Resources	p. 3-1043	22-29	There are four RFFAs within the geographic area of influence for noxious weeds in Segment 4 and two additional actions that involve vegetation management and noxious weed treatment in Baker County. The four RFFAs consist of wind turbine installations, a mining operation, and geothermal operation.	Check Table 3-315; only 3 actions and 2 vegetation management actions are listed. These actions would be required to have design features in place to reduce the spread and introduction of noxious weeds, particularly if on public land or with a county Conditional Use Permit.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.3 Cumulative Effects Analysis/ Vegetation Resources	p. 3-1043	31-32	There are no identified RFFAs within the geographic area of influence within Segment 5 that would potentially affect vegetation communities, special status species, or ethnobotanical resources.	What about the Grassy Mountain Gold project that is listed in Table 3-315 for Segment 5?	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.3 Cumulative Effects Analysis/ Vegetation Resources	p. 3-1044	1-6	Present actions in Segment 5 would primarily include irrigated and dry land farming as this area is remote and only well populated to the east of the Proposed Action.	There are other past and present actions listed in Table 3-314 for Segment 5. According to Table 3-38, agriculture makes up less than 3 percent of the analysis area. Clarify how irrigated and dry land farming is the primary action? What about other present actions?	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.3 Cumulative Effects Analysis/ Vegetation Resources	p. 3-1044	7-15	Noxious Weed Section	The mine would be required to have design features in place to reduce the spread and introduction of noxious weeds, particularly if on public land or with a county Conditional Use Permit. This, combined with the B2H Project, would not have a moderate cumulative impact. Consider clarifying and changing the definition of moderate impact from being a new introduction to a county, particularly since it is speculative.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.3 Cumulative Effects Analysis/ Vegetation Resources	p. 3-1044	19-20	One RFFA, the Gateway West transmission line, is proposed to originate from the terminus of the Proposed Action.	Both B2H and GWW would terminate at the Hemingway substation. Update to something similar to: "One RFFA, the Gateway West transmission line, is also proposed to terminate at the Hemingway substation."	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.3 Cumulative Effects Analysis/ Vegetation Resources	p. 3-1044	28-32	Present actions in this area include operation and maintenance of the Hemingway substation as well as irrigated and dry land farming. The area has been developed and topography would likely limit further expansion of farming operations in this area. Therefore cumulative effect of the Proposed Action, the Gateway West transmission line, and present actions on vegetation communities in the geographic 31 area of influence would be low.	There are other present actions such as grazing, expansion of developed areas, other transmission lines, and various roads including highways listed in Table 3-314. According to Table 3-38, agriculture makes up less than 3 percent of the analysis area.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.3 Cumulative Effects	p. 3-1044	34-35	There are no federally listed or BLM priority special	See comment in Section 3.2.3.6 concerning special status species in	The Final EIS has been revised to provide more detailed analysis of

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Analysis/ Vegetation Resources			status species known to occur within the geographic area of influence for Segment 6.	Segment 6 from page 3-186 lines 15-18.	potential cumulative effects Section 3.3).
3.3.4.3 Cumulative Effects Analysis/ Vegetation Resources	p. 3-1045	3-10	The Gateway West transmission line would increase the potential for noxious weed infestation through ground disturbance, transport of noxious weed seeds on vehicles along new access roads, and potential introduction of noxious weeds to regions of the county not currently infested with some species. Present actions primarily consisting of farming, land development, and energy development would have a moderate incremental effect with the Proposed Action. The cumulative impact of the Gateway West transmission line, Proposed Action, and present actions (including farming and development) would be moderate for this segment.	Consider that the Gateway West Transmission line and other actions would have design features in place like the B2H Project that would reduce the potential for spread and introduction of noxious weeds within the analysis area.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1045-1065	Entire Section	n/a	Provide maps showing wildlife cumulative effects analysis areas and locations of RFFAs.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1046	10	Segment 1 – Morrow – Umatilla	The alternatives are broken out for Segment 1 and not the other alternatives in other segments. Consider breaking that information out for all segments.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1046	11	…within a 5-mile geographic area of influence…	What happened to the Cumulative Effects Analysis Areas described in Table 3-313 for Wildlife Resources?	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1046	27	Several RFFAs…	Identify all RFFAs within the Analysis Area for WAGS.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1046	28	…geographic area of influence…	Should this read: “cumulative effects analysis area?” Do a global check as this term appears to have replaced analysis area throughout the Wildlife section.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1047	1	Special Status Species	Discussion on special status species is too general. Address specific impacts on special status species by amphibians, reptiles, birds, mammals, and invertebrates.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1047	14	It is well documented that power lines, communication towers, and wind generation facilities cause both direct and indirect moralities to migratory birds and raptors.	Provide citation for reference materials supporting BLM’s conclusion that “power lines, communication towers, and wind generation facilities cause both direct and indirect moralities to migratory birds and raptors.” Identify such materials that address specifically the impacts, if any, from high-voltage transmission projects using similar design features as proposed here. Correct “moralities” to “mortalities.” Explain how each of the facilities results in indirect mortality, particularly with respect to high-voltage transmission projects using similar design features as proposed here.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1047	19-20	…perch and nesting site deterrents, would, conversely, decrease nesting and hunting opportunities for raptors.	Deterring nesting and perching opportunities for raptors on a new transmission line would have no impact on the current raptor population and existing nesting opportunities available in the area. Remove the statement that deterrents would decrease nesting and hunting opportunities. A more accurate statement would be “perch and nesting site deterrents would result in no increase in perching and nesting opportunities currently available to raptors.”	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1048	1-2	Present actions would result in moderate direct impacts to big game…	Explain the basis for the conclusion that present actions have or “would” have moderate direct impacts to big game and identify such impacts in more detail.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1048	8	Washington Ground Squirrel	Do not repeat threats/impacts for species if they are exactly the same as those discussed in a previous section. Refer the reader back to read the information. Implement this approach throughout the section.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1048	17-18	RFFAs impacting WGS within the geographic area of influence for the Horn Butte Alternative include the Saddle Butte Wind Park.	Wouldn’t the NWTSF also be within the Analysis Area for WAGS? As stated earlier, maps showing RFFAs and Analysis Areas would help to understand the discussion.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife	p. 3-1051	28-33	In accordance with BLM WO IM 2012-043 compensatory mitigation for any Project-related	Per BLM WO IM 2012-043, mitigation planning for impacts to sage-grouse or its habitat is to be completed in “cooperat[ion] with project	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).

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Resources			impacts on Greater Sage-Grouse or Greater Sage-Grouse habitats would be provided by the applicant. For the selected route for the Project (i.e., Agency Preferred Alternative), the BLM, USFS, ODFW, IDFG, and USFWS will determine the amount, type, and location of off-site mitigation required to avoid or minimize short- and long-term impacts of the Project on Greater Sage-Grouse (Appendix D and Appendix E).	proponents." Idaho Power requests that it be included as a participant in the development of amendments to Appendix D or E, including any determinations of the amount, type, and location of off-site mitigation.	
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1051	33-35	Because there would be fragmentation and modification of habitat for Greater Sage-Grouse from direct and indirect effects, the Proposed Action and the Glass Hill Alternative would result in high impacts to Greater Sage-Grouse.	Explain the conclusion that there are high impacts to sage-grouse in Segment 2. Reconsider how impact criteria are defined. There is very little sage-grouse habitat and very minimal sage-grouse activity in Segment 2.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1052	7-10	A decision on the Proposed Plan from the Oregon Sub-Region Greater Sage-Grouse RMP Amendment 7 EIS planning effort is expected in 2015. The Proposed Plan will implement land use allocations, 8 infrastructure development buffers and limitations, and areal disturbance caps that are intended to 9 conserve and enhance Greater Sage- Grouse populations in Oregon into the foreseeable future.	This statement is placed throughout Chapter 3 without any context. Expand on how that decision will impact the analysis presented in this DEIS.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1053	14-16	Present actions, including dry land farming, timber management, grazing, transmission lines, roads, pipelines, and forest management activities, continue to eliminate or impact habitat for big game.	Discuss that some timber management/forest management activities benefit elk by increasing available forage.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1063	30-31	The intensity of cumulative effects to wildlife is the same for the Proposed Action and all alternatives so no distinction is made between alternatives or among Project Segments.	Provide more detailed explanation supporting this conclusion. For example, consider discussing each intensity factor set forth in 40 C.F.R. § 1508.27 for each alternative, how each intensity factor conclusion compares among the alternatives, and how the overall intensity determination for each alternative compares to the other alternatives.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.4 Cumulative Effects Analysis/ Wildlife Resources	p. 3-1064/ Table 3-316	n/a	n/a	Explain why the Resources presented in this table are different from those described in Table 3-313? Reconcile.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources				Overall the Fish Resources cumulative impacts is fairly well written and provides a consistent form of analysis across segments and alternatives. The consistent and concise analysis and tables should be used as a template for Section 3.2.5.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1065	5	…sub-basins (4th level HUCs)…	Be consistent on the use of sub-basins versus subbasins in both Section 3.2.5 and 3.3.4.5. Hydrologic scales are problematic in Section 3.2.5 and need to be consistent between the two sections. Be consistent with 4th level versus fourth level. The recommended terminology should be fourth level eight digit hydrologic unit codes (HUC). Once defined, it should be referred to as fourth level, fourth level eight digit HUC, or eight digit HUC. Be consistent across hydrologic scales. Section 3.2.5 introduces Basins, subbasins, watersheds, and subwatersheds and does not appear consistent with those applications. Recommendation is to use the sixth level 12 digit HUCs for analysis in Section 3.2.5 as the majority of the data is presented at the level. For Section 3.3.4.5 information could be reported at the fourth level; however a table either in Section 3.2.5 or 3.3.4.5 needs to be provided that cross-walks for a reader from fourth level to sixth level (i.e., how the sixth level roles up into the fourth level). Using the fourth level for cumulative impacts is typically more effective because of the lack of useable information for reasonable foreseeable actions, but this needs to be coordinated with Section 3.2.5 and provide the reader with the cross-walk of how the information was rolled up. Confusing scales (e.g., hydrologic, intensity of impacts) of impacts can result in non-comparable analysis of effects between segments and alternatives.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects	p. 3-1065	18	…of the project components…	…of the Project components…	The Final EIS has been revised to provide more detailed analysis of

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Analysis/Fish Resources				Has components been defined earlier? Ensure terms have been defined that are associated with Project.	potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1066	14	…and Umatilla watersheds…	Again, hydrologic scales are being confused. On page 3-1065 the fourth level, being referred to as a sub-basin (subbasin) is used. Now the term watersheds is being used. These are not the same thing and result in substantially different analyses, results, and impacts. Be consistent with scales of impacts and how they are mentioned. This applies to all text, tables, and figures throughout this section.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-317	19		Although the table presents an effective analysis, by presenting the "estimated number of streams potentially effected" it suggests these streams would be impacted in their entirety, which is not the case. Transmission line construction and road impacts, if any, would likely be local and with minimal downstream and/or downslope effects, but do not necessarily result in the entire stream being impacted. Consider disclosing this information through scientific literature in Section 3.2.5 and providing a summery on pages 3-1065 to 3-1066 in Section 3.3.4.5.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1067	8	…to disturb 31 streams and low…	Where does the 31 streams come from? Check numbers being presented and ensure consistent effects determination across segments and alternatives.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.4).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1068	9	…critical habitat or Essential Fish Habitat…	In Section 3.2.5 acronyms are used for these. Recommend keeping these terms spelled out in both sections due to the number of acronyms already used; however, consistency between the sections is important.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.4).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1068	22	…non-sensitive Indirect long-term…	…non-sensitive. Indirect long-term…	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1069	2-6		Explain the conclusion that there is negligible effects associated with RFFAs, low for general fish, and moderate for sensitive species, but overall moderate cumulative effects? Check for consistency between segments and alternatives in regards to scale of impact determination.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1069	9	…effected streams not known…	…effected streams are not known…	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1069	22	…would cross are not known…	…would cross areas not known…	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1069	27	…species Indirect long-term…	…species. Indirect long-term… Check this throughout as there are number of instances there is no period between these two sentences.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1070	10	…per year) .	…per year).	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.5 Cumulative Effects Analysis/Fish Resources	p. 3-1070	17	…the Proposed when…	…the Proposed Action when…	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects Section 3.3).
3.3.4.6 Cumulative Effects Analysis/Land Use	p. 3-1072	22	If the direct and indirect impacts to were considered to be none or negligible	If the direct and indirect impacts ~~to~~ were considered to be none or negligible.	The section has been revised and comment no longer applies.
3.3.4.6 Cumulative Effects Analysis/Land Use	p. 3-1073	35-36	the transmission line and substation would likely preclude agricultural uses within the associated right-of-way and footprint	The transmission line would not necessarily "preclude" agricultural operations and uses within the right-of-way. It is correct the line may impact operations and uses, but not preclude. In many or most instances, agriculture including irrigated agriculture can continue within the transmission line right-of- way with little or no modifications. Similarly, grazing can continue to occur in and around transmission structures.	The word "preclude" has been replaced with "impact."
3.3.4.6 Cumulative Effects Analysis/Land Use	p. 3-1074	4-5	The cumulative effects to land use for the analysis area for the Longhorn Variation would be the same as those associated with the Longhorn Alternative.	There is a proposed 230kV double-circuit transmission line along the east side of Bombing Range Road. This proposed transmission line, by 2Morrow Wind, has contemplated tieing into the possible Longhorn Substation.	The section has been revised and comment no longer applies.
3.3.4.6 Cumulative Effects Analysis/Land Use	p. 3-1076	31	effects in the Weatherby area would be high due to the long-term displacement of other land uses.	Describe "other" land uses? Are they agriculture, private property and operations, or residential? A statement that describes "long-term displacement" seems to warrant more in-depth discussion.	The section has been revised and comment no longer applies.
3.3.4.6 Cumulative Effects Analysis/Land Use	p. 3-1081	18-19	The direct and indirect effects of the Proposed Action and alternatives would be low and would.	Describe the effects in more detail.	The Final EIS has been revised to provide more detailed analysis of potential cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. Effects analysis has been revised to provide both qualitative and quantitative analysis of potential effects on

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					resources. Refer to Section 3.3 Cumulative Effects for further detail.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1081	28-29	The geographic area of influence for the analysis of cumulative impacts to visual resources is defined as the viewshed within a 10-mile distance of the Proposed Action and alternatives.	The cumulative impact analysis area should include areas outside of the viewshed such hat RFFAs within the 10-mile buffer can be considered.	This text has been revised as the analysis included all areas within 10 miles of the B2H Project since different types of projects, such as windfarms, would be more visible than a viewshed run from the Project.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1081	31-32	The present actions and RFFAs are listed in Table 3-315 and are described above. These are the actions considered in the visual resource cumulative analysis.	Tables 3-315 through 3-325 provide a comparison of the Proposed Action and relevant alternatives to the proposed Baker RMP. It is not clear how this comprises a cumulative impact analysis. It appears that these tables are referring to the direct and indirect impacts of the project. Explain how BLM can rely on these tables to assess cumulative impacts—i.e., the incremental addition of project direct and indirect impacts onto the impacts of past, present, and reasonably-foreseeable future actions not associated with the project, but affecting the same resources.	These have been removed and moved into the Visual Resource section with effects on scenic quality and sensitive viewing platforms.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1082	11-14	The modifications include looking at the potential from a more qualitative approach and not separating the foreground from the middleground impacts.	Clarify this sentence to indicate what is meant by "…looking at the potential…"	The cumulative effects methodology has been revised and this text was removed.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1082	28-29	The visibility conditions, quantification of view, and angle of observations from the sensitive viewing platforms and Special Management Areas of the RFFA are not evaluated because the specifics (such as the height, building configuration, layout of turbines, design features, alignment of transmission lines, and transmission tower types) of the project components associated with the actions are not known at this time.	Consider the extent to which these metric can be estimated based on a map of RFFAs and assumption of project types.	The cumulative effects methodology has been revised and this text was removed.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1082	19-21	Unless otherwise noted the middleground level of direct impact created by the Proposed Action and alternatives was used to determine the level of cumulative impacts when considered with the present actions and RFFAs.	Explain why FG impacts were dismissed from this analysis.	The cumulative effects methodology has been revised and this text was removed.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1082	22-25	If the direct impacts to scenic quality, landscape character, and sensitive viewers were considered to be none or negligible as a result of the construction and maintenance of the Proposed Action or alternatives, there would be no contribution to visual resources cumulative impact	Clarify that direct impacts to scenic quality, landscape character, and sensitive viewers resulting from construction and maintenance have been disclosed in this analysis.	The cumulative effects methodology has been revised and this text was added clarifying direct project effects and cumulative effects.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1082	25-28	In addition, there would be no cumulative impacts if <u>there would be no direct impacts would</u> result from the construction and operation of present and RFFAs because either there were no identified actions within the geographic area of influence or the actions would result in negligible or no impacts.	Clarify this sentence.	The cumulative effects methodology was revised and this text was removed.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1083	7-9	The Proposed Action when added to the past, present, and RFFAs would have a moderate cumulative impact from these three linear platforms within the Proposed Action's geographic area of influence.	Global to cumulative impact assessment: Cumulative impacts includes combined effects of the proposed action and past, present, and reasonably foreseeable actions. Consider recasting to "Collectively, the Proposed Action, when added to the past, present, and RFFAs would result in moderate cumulative impacts to visual resources experienced from these three linear platforms."	The cumulative effects methodology was revised and this text was removed.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1083	9-12	The contribution of the Proposed Action to the cumulative visual resource impact would be minor in terms of scale because of the low direct impacts to the views from the Blue Mountain Scenic Byway, Oregon NHT, and Oregon State Highway 74 platforms.	See ***Global comment regarding use of environmental factor in the analysis*** above pursuant to pp. 3- 571 and 3-572 applicable to in the analysis.	The cumulative effects methodology was revised and this text was removed.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1083	35	"…present, and RFFA would be a high cumulative impact on scenic quality…	Clarify by adding "result in", as follows "…present, and RFFA would result in a …"	The cumulative effects methodology was revised and this text was removed.
3.3.4.7 Cumulative Effects Analysis/Visual Resources	p. 3-1084		The contribution of the Proposed Action to the cumulative visual resource impact would be major in the Willow Creek (BA-10 002), Longhorn (BA-003), and Butter Creek (BA-004) VAUs because of the high direct magnitude of change in landscape character	Global to cumulative impact assessment: Clarify the ranking of high magnitude of change in landscape character as only FG landscape character impacts are presented in the analysis of Direct Impacts.	The cumulative effects methodology was revised and this text was removed.

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			within the Proposed Action's geographic area of influence.		
3.3.4.8 Cumulative Effects Analysis/Cultural Resources	p. 3-1106	4	These reasonably foreseeable future actions are not anticipated to produce cumulative impacts to cultural resources within the indirect cumulative impact analysis for cultural resources.	Explain this conclusion in light of the foreseeable impacts, if any, of the projects in Table 3-326, including the transmission line projects, that are situated near the Proposed Action. Explain in more detail your conclusion that these foreseeable actions will not indirectly affect cultural resources in a cumulative manner. For example, address the VAHP Study Plan discussion that "[i]n several areas, the Project will be placed immediately beside existing transmission lines and may affect historic properties in a cumulative manner."	This text has been revised. Cumulative effects on cultural resources would occur over the life of the B2H Project and other current and future projects, including direct effects during construction and indirect effects during operation and maintenance activities.
3.3.4.9 Cumulative Effects Analysis/National Historic Trails	p. 3-1107 and 3-1108	5-38 and 1-6	National Historic Trails - Methodology	The cumulative effect analysis appears to have been written by a different author than the main NHT analysis. It includes, for instance, discussions of "sensitive viewers" without discussing who they are within the context of NHTs. A similar mentioning of "visibility conditions, quantification of view, and angle of observations" had not been mentioned in the previous NHT section and it is unclear how it is germane to the analysis. Explain if different methods or approaches were taken to evaluate the impacts in the cumulative effects section versus the NHT section. If different methods or approaches were taken, provide a discussion justifying that decision.	The cumulative effects methodology has been revised for the Final EIS including matching the analysis approach used for direct project effects.
3.3.4.9 Cumulative Effects Analysis/National Historic Trails	p. 3-1108	18-29	Cumulative Impacts Segment 1 Morrow Umatilla	Provide a discussion of what the RFFAs are for this segment; otherwise, it remains difficult to verify how the cumulative impacts interact with the project such that there would be a moderate impact. The other alternatives analysis should be reviewed to ensure there is an adequate level of specificity as to how the RFFAs interact with the Proposed Action and how that interaction can create a cumulative impact.	The cumulative effects methodology has been revised and RFFAs in proximity to the B2H Project were added to the discussion to provide additional context for cumulative effects.
3.3.4.10 Cumulative Effects Analysis/Air Quality and Climate Change	p. 3-1111	3-4	Furthermore, the reduction in coal-related emissions from the planned improvements to the Boardman Plant would help to offset the emissions from the B2H Project.	The Draft EIS discusses the cumulative effects of Project in relation to the Boardman Plant and none of the other RFFAs identified in Table 3-315. Disclose the potential increases in GHG emissions related to the cumulative effects of the Project and the RFFAs identified in Table 3-315, and how the increases, if any, may translate to climate change effects. Where information necessary to evaluate GHG emission or climate change effects is incomplete or unavailable, either collect the necessary information or discuss why the cost to obtain such information is exorbitant, how the missing information is relevant to the environmental analysis, and how BLM will evaluate impacts without the information.	The cumulative effects section has been revised.
Section 3.4 Plan Amendments					
3.4.2 Plan Amendments/Plan Conformance	p. 3-1117	n/a	Entire Section	Explain the proposed plan amendments in the context of Idaho Power's comments provided under Compliance with Management Objectives, page 3-706.	Revised
3.4.2.1 Plan Amendments/Plan Conformance/Baker RMP	p. 3-1117	n/a	Because of the visual contrast, the Proposed Action would not be in conformance with VRM Class III objectives established in the RMP for the area near the National Historic Oregon Trail Interpretive Center near Baker, Oregon. The VRM class designations and the 250-foot Proposed Action right-of-way that are not in conformance are shown in red in Figure 3-73. The purpose of the RMP amendment would be to modify the Baker RMP regarding visual resource management in order to grant a right-of-way for the Proposed Action across BLM-administered lands managed under the Baker RMP.	BLM should clarify that none of the Alternatives would require an amendment to the Baker RMP. Similarly, only certain portions of the Proposed Action would implicate an amendment to the Baker RMP. Consider adding the following statement: "Other than the portions of the Proposed Action shown in red in Figure 3-73, the Proposed Action would not implicate an amendment to the Baker RMP. None of the Alternatives would require an amendment to the Baker RMP."	Revised
3.4.2.1 Plan Amendments/Plan Conformance/Baker RMP	p. 3-1119	n/a	The portion of the 250-feet-wide right-of-way for the Boardman to Hemingway Transmission Project within VRM Class III lands in the vicinity of the National Historic Trail Interpretive Center . . . would be amended to VRM Class IV (a total of approximately 70 acres) for only those portions of the Project that would still exceed acceptable levels of change within the VRM Class III areas after application of all feasible measures to reduce impacts on visual resources is exhausted.	Explain how the proposed amendment would affect, if at all, the VRM classification of the lands located outside the 250-foot right-of-way, including but not limited to how the VRM classification would be implemented after the plan amendment.	Revised

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3.4.2.1 Plan Amendments/Plan Conformance/Baker RMP	p. 3-1119	n/a	The following components of the Visual Resource Inventory (VRI) are located within the Project area boundary: Scenic Quality Rating Units: 70 acres of Class B lands; Sensitivity Level Rating Units: 70 acres of high sensitivity lands; Distance Zones: 70 acres in the Background distance zone; VRI Class: 70 acres of VRI Class II lands.	Explain how the proposed amendment would affect, if at all, the VRI and its components, including but not limited to how the VRI would be implemented after the plan amendment and how, if at all, the component values would change.	Revised
3.4.2.2 Plan Amendments/Plan Conformance/SEORMP	p. 3-1121	n/a	n/a	BLM should clarify that the Willow Creek and Double Mountain Alternatives would not require an amendment to the Southeastern Oregon RMP. Similarly, only certain portions of the Proposed Action, Tub Mountain Alternative, Malheur S Alternative, and Malheur A Alternative would implicate an amendment to the Southeastern Oregon RMP. Consider adding the following statement: "Other than the portions of the Proposed Action, Tub Mountain Alternative, Malheur S Alternative, and Malheur A Alternative shown in red in Figures 3-74, 3-75, 3-76, 3-77, and 3-78, the Proposed Action, Tub Mountain Alternative, Malheur S Alternative, and Malheur A Alternative would not implicate an amendment to the Southeastern Oregon RMP. The Willow Creek and Double Mountain Alternatives would not require an amendment to the Southeastern Oregon RMP."	Revised
3.4.2.2 Plan Amendments/Plan Conformance/SEORMP	p. 3-1127	n/a	For the Proposed Action the Southeastern Oregon RMP would need to be amended at the Visual Resources section beginning on page 67 to add the following language: The portion of the 250-feet- wide right-of-way for the Boardman to Hemingway Transmission Project within VRM Class II lands in the Owyhee River Below the Dam ACEC . . . would be amended to VRM Class IV (a total of approximately 15 acres) for only those portions of the Project that would still exceed acceptable levels of change within the VRM Class II areas after application of all feasible measures to reduce impacts on visual resources is exhausted.	Explain how the proposed amendment would affect, if at all, the VRM classification of the lands located outside the 250-foot right-of-way, including but not limited to how the VRM classification would be implemented after the plan amendment.	Revised
3.4.2.1 Plan Amendments/Plan Conformance/Baker RMP	p. 3-1119	n/a	The following components of the VRI are located within the Project area boundary: Scenic Quality Rating Units: 15 acres of Class B lands; Sensitivity Level Rating Units: 4 acres of high sensitivity lands and 11 acres of medium sensitivity lands; Distance Zones: 15 acres in the foreground-middleground distance zone; VRI Class: 4 acres of VRI Class II lands and 11 acres of VRI Class III.	Explain how the proposed amendment would affect, if at all, the VRI and its components, including but not limited to how the VRI would be implemented after the plan amendment and how, if at all, the component values would change.	Revised
3.4.2.2 Plan Amendments/Plan Conformance/SEORMP	p. 3-1127 through p. 3-1128	n/a	For the Tub Mountain South Alternative the Southeastern Oregon RMP would need to be amended at the Visual Resources section beginning on page 67 to add the following language: The portion of the 250-feet-wide right-of-way for the Boardman to Hemingway Transmission Project within VRM Class III lands in the vicinity of the National Historic Oregon Trail ACEC . . . would be amended to VRM Class IV (a total of approximately 112 acres) for only those portions of the Project that would still exceed acceptable levels of change within the VRM Class III areas after application of all feasible measures to reduce impacts on visual resources is exhausted.	Explain how the proposed amendment would affect, if at all, the VRM classification of the lands located outside the 250-foot right-of-way, including but not limited to how the VRM classification would be implemented after the plan amendment.	Revised
3.4.2.2 Plan Amendments/Plan Conformance/SEORMP	p. 3-1128	n/a	For the Malheur S Alternative the Southeastern Oregon RMP would need to be amended at the Visual Resources section beginning on page 67 to add the following language: "The portion of the 250-feet-wide right-of-way for the Boardman to Hemingway Transmission Project within VRM Class II lands in the Owyhee River Below the Dam ACEC . . . would be amended to VRM Class IV (a total of approximately 23 acres) for only those portions of the	Explain how the proposed amendment would affect, if at all, the VRM classification of the lands located outside the 250-foot right-of-way, including but not limited to how the VRM classification would be implemented after the plan amendment.	Revised

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			Project that would still exceed acceptable levels of change within the VRM Class II areas after application of all feasible measures to reduce impacts on visual resources is exhausted.		
3.4.2.2 Plan Amendments/Plan Conformance/SEORMP	p. 3-1128	n/a	For the Malheur A Alternative the Southeastern Oregon RMP would need to be amended at the Visual Resources section beginning on page 67 to add the following language: The portion of the 250-feet-wide right-of-way for the Boardman to Hemingway Transmission Project within VRM Class II lands in the Owyhee River Below the Dam ACEC . . . would be amended to VRM Class IV (a total of approximately 79 acres) for only those portions of the Project that would still exceed acceptable levels of change within the VRM Class II areas after application of all feasible measures to reduce impacts on visual resources is exhausted.	Explain how the proposed amendment would affect, if at all, the VRM classification of the lands located outside the 250-foot right-of-way, including but not limited to how the VRM classification would be implemented after the plan amendment.	Revised
3.4.2.2 Plan Amendments/Plan Conformance/Wallowa-Whitman LRMP	p. 3-1134	n/a	For the purposes of constructing, operating, and maintaining the B2H transmission line: the VQO for 110 acres located within the Proposed Action right-of-way would be redesignated from Partial Retention to Modification. Redesignating the VQO from Partial Retention to Modification. Would allow for more visually intrusive projects to be located in the redesignated 110 acres.	Explain how the amendment re-designating the 110 acres from Partial Retention to Modification would affect compliance with the VQO in the adjacent Partial Retention areas.	Revised
Section 4 Consultation and Coordination					
4. Consultation	n/a	n/a	n/a	Consider discussing coordination efforts of the Interagency Rapid Response Team, Pacific Northwest Regional Infrastructure Team, or both.	Comment noted
4.6.1 Consultation/ Preparers/BLM	p. 4-9	1	Bruce Bohn	Should be “Bryce Bohn.”	Mr. Bohn’s name has been removed from the lists; he is not longer working on the project.
Section B.3 Supporting Data for Vegetation Resources					
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Be consistent and use the term “analysis area”, since it was defined, instead of the various terms used in this section such as project area, Project Area, Project area, B2H Project area, Proposed Action and all alternatives, analysis areas of the Proposed Action and all alternatives, analysis areas, vicinity of the Proposed Action and alternatives, etc. The use of so many different terms is confusing to the reader and it is unknown if these are the same or not.	Revised
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Be consistent and define terms such as primary vegetation community vs vegetation community vs land cover type vs ecological system vs community subtype, etc. It is confusing since the section jumps around between all of these terms and descriptions.	Revised
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Make sure all citations are included in Chapter 6 – References. Most references were not included so it difficult to determine if they are appropriate.	Revised
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Use common names for plants and include the italicized scientific name in parentheses the first time the common name is used in text. Do not repeat the scientific name more than once. Check this throughout the entire section, as many are repeated multiple times and in some instances scientific names are used instead of common names or scientific names are used with common in parentheses. If the scientific name is called out in a table, it doesn’t need to be called out again later in text. Special status plants scientific names were called out in Table 3-36 and do not need to be called out again in the description by segment. Make sure that the subspecies name is not capitalized, as it often is throughout this section, i.e., *Artemisia tridentata* ssp. ***V****aseyana.*	Revised

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				It would be helpful to cite the nomenclature used in the document, particularly since ODA may have a different common name than USDA Plants database.	
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Be consistent with reporting numbers and please include a "comma" when reporting numbers >1,000.	Revised
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Be consistent in the use of ORNHIC vs ORBIC. The current name is ORBIC, so ORNHIC should not be used to avoid confusion.	Revised
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Medusahead rye does not need to be capitalized.	Comment noted
3.2.3 & Appendix B.3	General-applies to entire Vegetation Resources section and Appendix B.3	n/a	n/a	Use the acronym "ROW" for all references to right-of-way within this section. Use of this term should be consistent. In this section there is reference to right-of-way, right of way, and rights-of-way.	The term "right-of way" is consistent with style guide for the EIS approved by BLM. No changes made.
Appendix B.3	p. B.3.3 Table B.3-1/ B.3-8	n/a	*Cardaria pubescens* (hairy whitetope), *Centaurea calcitrapa* (purple starthistle), *Centaurea iberica* (Iberian starthistle), *Centaurea solstitialis* (yellow starthistle), *Convolvulus arvensis* (field bindweed),*Cyperus esculentus* var. *leptostachyus* (yellow nutsedge, *Elymus repens* (quackgrass), and *Polygonum sachalinense* (giant knotweed) have incorrect noxious weed "type" for either the Idaho or Oregon State List	Update with current State Designations. Idaho Power can provide this current information in a spreadsheet if requested. Up-to-date information can also be found at the following links for the respective sites: Idaho: http://www.agri.state.id.us/Categories/PlantsInsects/NoxiousWeeds/watchlist.php Oregon: http://www.oregon.gov/ODA/shared/Documents/Publications/Weeds/NoxiousWeedPolicyClassificatio n.pdf	Revised
Appendix B.3	p. B.3-8; Table B.3-1	1-3	Table Source: US Fish and Wildlife Service list of threatened, endangered, proposed, and candidate species occurring in Baker, Malheur, Morrow, Owyhee, Umatilla, and Union Counties (http://oregon.fws.gov/ and http://idaho.fws.gov accessed June 15, 2013)	Links provided do not work. Internet address manually typed/searched does not provide source. Update. The table source is not appropriate for this table. This is a source for threatened, endangered species, but the table is for noxious weeds. Update this with the correct table sources. USDA plant database should be referenced. Provide a reference for the "BLM WSC" species. Define the "WSC" abbreviation in an endnote. Provide a reference or references for Oregon County List column.	The section has been updated with current weed lists from state and county weed control agencies and the appropriate references cited.
Appendix B.3	p. B.3-8; Table B.3-1	4-6	Table Abbreviations: A = Class "A" Weed (highest priority), B = Class ""B" Weed, C = Class "C" Weed, EDRR = early detection and rapid response, N/A = not applicable (meaning the noxious weed is not listed), WSC = weed species of concern, USDA = U.S. Department of Agriculture.	Define and clarify each of these abbreviations and provide the appropriate references. Clarify the difference between A and B for the Oregon State List and the Oregon County List column. Define "T" in the Oregon State List.	Revised
Appendix B.3	p. B.3-9 to B.3-11; Table B.3-2			provide the appropriate references as a footnote.	The section has been updated with current weed lists from state and county weed control agencies and the appropriate references cited.
Appendix B.3	p. B.3-9 to B.3-11; Table B.3-2			This is cross referenced from the Resource Report, but not referenced. The listed Ecological Systems in the comments below are present in the Resource Report but *missing* (not accounted for) from the DEIS. It appears that the same data and methods were used for both. Verify and clarify why there is a discrepancy of 26 ecological systems (excluding wetland). East Cascades Oak-Ponderosa Pine Forest and Woodland, North Pacific Mountain Hemlock Forest, Northern Rocky Mountain Subalpine woodland and parkland, Rocky Mountain Subalpine mesic-wet spruce-	The identification of wetland, riparian, and surface-water vegetation communities has been revised in the Final EIS to use the RCA methodology described in Section 3.2.3.4. The RCA methodology differs from classification of other vegetation communities by not relying on reclassified GAP data to identify community extents. Because of this difference, RCA vegetation communities are not included in Appendix D – Vegetation Supporting Data table cross walking vegetation communities to their source ecological systems.

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				fir forest and woodland, Rocky Mountain Subalpine-Montane Limber-Bristlecone Pine Woodland, Introduced Upland Vegetation—Treed, Recently burned forest, harvested forest-tree regeneration, Northern Rocky Mountain subalpine-Upper Montane Grassland, North Pacific Montane Shrubland, Rocky Mountain Lower Montane-Foothill shrubland, Northern Rocky Mountain Subalpine Deciduous Shrubland, Introduced Upland Vegetation-Shrub, Introduced Upland Vegetation-Forbland, Recently burned Shrubland, Harvested forest-shrub regeneration, Conservation Reserve Program, High Structure Agriculture, Quarries, Mines, and Gravel Pits, Inter-Mountain Basins Volcanic Rock and Cinder Land, Rocky Mountain Alpine Bedrock and scree, Open water, lacustrine, Palustrine Aquatic Bed, palustrine Unconsolidated Bottom, and Riverine. The number and/or the systems above do not include the "Wetland" Ecological Systems as they were not provided in the DEIS and could not be cross-referenced. Provide the grouping of ecological systems used for the wetland Primary Vegetation Community.	
Appendix B.3	p. B.3-9 to B.3-11; Table B.3-2		**<u>Resource Report:</u>** **Methodology:** 4.1.1 p5 line2-3: "1 mile corridor around the proposed and alternative routes (i.e. 0.5 miles each side of route's centerline)." **Source:** 4.1.4 p10 line 2-3: " Northwest regional GAP Analysis Project (reGAP) as base layer" **<u>DEIS</u> Methodology:** p3-105 line 31-32: "In general, the analysis area for vegetation resources was defined as a one mile- wide corridor; 0.5 mile on either side of the Proposed Action and alternatives centerlines.:" **Source:** p 3-105 Line 1: NWGAP (Regional Gap Analysis Program) Line 14-15: "A desktop GIS review of NWGAP data was used to identify the majority of vegetation communities…"	It appears that the methodology and source data in the DEIS is from the RR, but not referenced. Clarify why so many ecological systems are missing from the DEIS that were included in the RR? Include the wetland ecological systems. These may be most important for crosswalk because they came from multiple sources, unlike the general vegetation.	The identification of wetland, riparian, and surface-water vegetation communities has been revised in the Final EIS to use the RCA methodology described in Section 3.2.3.4. The RCA methodology differs from classification of other vegetation communities by not relying on reclassified GAP data to identify community extents. Because of this difference, RCA vegetation communities are not included in Appendix D – Vegetation Supporting Data table cross walking vegetation communities to their source ecological systems.
Appendix B.3	p. B.3-12 to B.3-34; General Comment		Special Status Plants-heading	In Section 3.2.3, Federally Listed Species are called out in a separate heading. In this Appendix, all species are lumped under Special Status Plants. Consistent in the way these species are broken out between Section 3.2.3 and Appendix B.3.	Revised
Appendix B.3	p. B.3-12 to B.3-34; General Comment		State Threatened	Clarify that "State Threatened" refers to Oregon State Threatened. Since this project overlaps 2 states, it should be clarified which state is being described. Make this clarification throughout the entire Special Status Plants section.	Revised
Appendix B.3	p. B.3-12 to B.3-34; General Comment		Status	Verify and update the status for each special status species in this Appendix and in Section 3.2.3. Many of the status designations are missing. For example, Laurent's milkvetch is also an OR BLM sensitive species and Douglas' clover is also an ID BLM special status species.	Revised
Appendix B.3	p. B.3-12 to B.3-34; General Comment		Order of species in this section	Order the species found in this Appendix; it is not easy to find a particular species since it is not in alphabetical order by common name or scientific name.	Revised
Appendix B.3	p. B.3-12 to B.3-34; General Comment		Status in parentheses	The status that is listed in parentheses do not match what is in Table 3-36. Review the status and make updates with the most recent lists as many are incorrect. For example, Laurence's milkveth is an OR BLM sensitive species.	Revised
Appendix B.3	p. B.3-12; and General Comment for entire Appendix B.3 and Section 3.2.3	2	Laurent's Milk-vetch	Be consistent with names throughout the entire Appendix B3 and Section 3.2.3. Sometimes the milkvetches are called "milkvetch" and sometimes "milk-vetch."	Revised
Appendix B.3	p. B.3-12	2-20	Laurent's Milk-vetch	This description is copied and pasted into the Affected Environment section as a description for this species. Instead of duplicating the same exact information, consider referencing Appendix B.3 in the Affected	Revised

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				Environment section. Verify that the information is consistent.	
Appendix B.3	p. B.3-12; and General Comment for entire Appendix B.3 and Section 3.2.3	2-20	Each description- sentences too long	Most of these descriptions pack too much information into one sentence by using ":" in between. Break these long sentences into multiple sentences and clarify the information.	Revised
Appendix B.3	p. B.3-12; and General Comment for entire Appendix B.3 and Section 3.2.3	11	Its Global Status is G5T1 (critically imperiled),	Define and cite "global status." Consider including the Oregon and Idaho state status for each species as well instead of only including the global status.	Revised Because state natural heritage program ratings are not available for each species discussed in Appendix D – Vegetation Supporting Data, the global status rank was discussed to provide consistent information for each species. The state natural heritage ranks for species occurring in the 1-mile analysis corridor are discussed in Section 3.2.3.6.
Appendix B.3	p. B.3-12; and General Comment for entire Appendix B.3	12	About 18 occurrences were known in 1983	Clarify this sentence and each reference in each special status plant description that includes the number of occurrences in Appendix B.3. Clarify if this is the total number of occurrences rangewide. Clarify why this was known in 1983 and if there is any more recent data available. Clarify this in every special status plant description that includes a date from the past.	Revised as suggested
Appendix B.3	p. 3-12; and General Comment for entire Appendix B.3	13-14	No sites are considered protected by NatureServe	Clarify what is meant by protected and this statement, which is repeated through this Appendix.	This section has been updated in the Final EIS and no longer refers to NatureServe defined protections.
Appendix B.3	p. B.3-12	31	Oregon populations were reported in the 1990s and it is not known if they have contemporary data on population density and viability (OFP 2012).	Clarify who "they" is in this sentence. Clarify if any data from more recent than 1990s is available. What is OFP? This is not listed in Chapter 6, references, but it is cited throughout Appendix B.3. Clarify and include this and all references in Chapter 6.	Revised
Appendix B.3	p. B.3-13	7-8	It has a Global Status of G5T5 (secure), but lacks analysis by NatureServe of its conservation status.	Clarify the statement "but lacks analysis by NatureServe of its conservation status." This statement is used throughout Appendix B.3 descriptions, but it is unclear what this means.	Revised
Appendix B.3	p. B.3-13	13-32	Thelypody	Use consistent names throughout Section 3.2.3 and Appendix B.3 for each species. The use of "Howell's spectacular thelypody", Howell's thelypody, and thelypody are all used.	Revised
Appendix B.3	p. B.3-13	29-32	There are twelve known occurrences of Howell's spectacular thelypody within 5 miles of the Proposed Action and alternatives in Union and Baker Counties; the closest occurrences are 1.2 miles from the Proposed Action and 3.8 miles from the right-of-way of the Flagstaff Alternative. Neither cross suitable habitat, although there are access roads to the Proposed Action which pass occupied habitat.	Use consistent terminology. Clarify if the 12 known locations are within the Analysis Area, as defined in the Affected Environment section. Clarify if the distances refer to the Analysis Area, ROW, or disturbance area. Clarify what is meant by "Neither cross suitable habitat, although there are access roads to the Proposed Action which pass occupied habitat." The access roads should be included in the disturbance area footprint and discussed in impacts analysis as well.	This section has been updated.
Appendix B.3	p. B.3-14; and General Comment for entire Appendix B.3	7-9	There is one occurrence of Douglas's clover within 2.4 miles of the Proposed Action, in the Ladd Marsh Game Management Area in Union County. Current population status is unknown.	This statement indicates that there is only one occurrence, but Table 3-53 indicates that there are three populations within the Analysis Area for Section 2. Table 3-53 indicates that the initial impacts to this species would be high, but residual impact would be moderate. Revise so these statements do not provide contradictory information. Verify that information within Section 3.2.3 and Appendix B.3 are consistent.	This section has been updated.
Appendix B.3	p. B.3-14	21-23 27-28	Oregon semaphore grass (Pleuropogon oregonus), also known by the scientific name Lophochlaena oregona, are centered in two very distinct locations in Oregon (one in Union County), separated by about 230 mi (370 km). Oregon semaphore grass has a 27 Global Status of G1 (critically imperiled) and is known from only eight occurrences.	Clarify where the "second" location is. Clarify the difference between locations and occurrences. The first statement says there are two locations and the later statement indicates there are 8 occurrences.	Revised
Appendix B.3	p. B.3-14 and	35-38; 1-25	Whitebark Pine	This species in not in Table 3-36 and not mentioned in Section 3.2.3.	This section has been updated to discuss only species occurring in the

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	B.3-15			Include.	10-mile analysis corridor. Whitebark pine is discussed in Section 3.2.3.4.
Appendix B.3	p. B.3-15	31	in heavy clay soil above the creek;	Clarify this statement. Break this sentences up as there is too much information in this sentence separated by ";."	This section has been updated.
Appendix B.3	p. B.3-15	23-24	at elevations above approximately 6,920 feet, thus 1,810 feet above the highest point on the Timber Canyon Alternative.	Clarify or update the word "thus" to something more appropriate like "which is."	This section has been updated.
Appendix B.3	p. B.3-16	1	May occur in Idaho;	Clarify this statement.	This section has been updated.
Appendix B.3	p. B.3-19	31-32	In Oregon, there are 10 occurrences with 100 or 100+ plants noted (NatureServe 2013).	Clarify if this is 100 or 100 plus plants per population.	This section has been updated.
Appendix B.3	p. B.3-20	5-7	In Idaho and Montana parts of its range, it has been reported to be closely associated with mature to old-growth western red cedar (NatureServe 2013).	Western red cedar are not within the Analysis Area.	This section has been updated.
Appendix B.3	p. B.3-20	14-15	It is found (in B2H Project area counties) along a creek and in a riparian zone;	This is very general. Clarify "a creek and in a riparian zone."	Revised
Appendix B.3	p. B.3-22	15	…due to being a regional endemic with about 52 populations known…	Verify the number of occurrences that are known and be consistent. Table 3-52 indicates that there are 115 populations within the Analysis Area for Segment 5.	This section has been updated in the Final EIS to consistently discuss occurrences between Section 3.2.3 and Appendix D – Vegetation Supporting Data.
Appendix B.3	p. B.3-22	36	69 total occurrences in a restricted range	Verify the number of occurrences that are known and be consistent. Table 3-51 indicates that there are 137 populations within the Analysis Area for Segment 4 alone.	This section has been updated.
Appendix B.3	p. B.3-22	38	"…species is threatened by… water level fluctuation at Brownlee Reservoir"	Studies completed for the Hells Canyon Complex relicensing effort and corresponding reports did not indicate Snake River Goldenweed was impacted by Brownlee Reservoir fluctuations. Snake River Goldenweed is an upland species, as indicated by the description in the DEIS, reservoir fluctuations would have minimal to no influence on upland plants. Remove this as a threat. See Holmstead, G. 2003. Vegetation of the Snake River Corridor in Hells Canyon—Weiser, Idaho, to the Salmon River. In: Technical appendices for new license application: Hells Canyon Complex. Boise, ID: Idaho Power. E.3.3-01. Krichbaum, R. 2000. E.3.3-2 Inventory of Rare Plants and Noxious Weeds Along the Snake River Corridor in Hells Canyon – Weiser, Idaho, to the Salmon River. In: Technical appendices for new license application: Hells Canyon Complex. Boise, ID: Idaho Power. Idaho Power. E.3.3-02. Braatne, J.H., S.B. Rood, R.K. Simons, L.A. Gom, G.E. Canali. 2002. Ecology of Riparian Vegetation of the Hells Canyon Corridor of the Snake River: Field Data, Analysis and Modeling of Plant Responses to Inundation and Regulated Flows. In: Technical appendices for new license application: Hells Canyon Complex. Boise, ID: Idaho Power. E. 3.3-03.	Revised
Appendix B.3	p. B.3-23; and General Comment for entire Appendix B.3	24-25	Greeley's wavewing is presently documented within 0.8 miles of the Proposed Action near Graveyard Point in Owyhee County. Current population status is unknown.	Clarify the distances that are mentioned in many of the descriptions; is it from the occurrence to the Analysis Area, ROW, or disturbance area? These terms should be defined and used consistently throughout Section 3.2.3 and Appendix B.3. Clarify the statement "Current population status is unknown." This is included in most descriptions.	This section has been updated.
Appendix B.3	p. B.3-24	22-23	it had not been seen since 1896 when it was rediscovered in 1984.	Verify these dates and clarify if these are correct.	This section has been updated.
Appendix B.3	p. B.3-26	9-10	Since suitable habitat is present, it may occur in Idaho and elsewhere in Oregon.	Clarify this statement in reference to the Project.	This section has been updated.
Appendix B.3	p. B.3-26	22	72 historic occurrences,	Define "historic." NatureServe has a definition for historic occurrence, but it is unclear what is meant in this sentence. Clarify if all 72 occurrences are historic and how that relates to its current number of occurrences.	This section has been updated.
Appendix B.3	p. B.3-27	14-15	Bigelow's four-o'clock (Idaho BLM Sensitive)	This plant is not on the current BLM special status plant list or the OR Sensitive Plant list. Remove it from the list or clarify why it is on the list. If it is included, please review and clarify the description.	Based on coordination with the BLM, it was decided this should be considered in the Final EIS as the known occurrences in Oregon represent the extreme northern extent of the species.
Appendix B.3	p. B.3-27	35	Ivesia's habitat	Use consistent names. Earlier this was called Grimy ivesia.	This section has been updated.

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Appendix B.3	p. B.3-28	4-5	is known from three states.	List the three states.	This section has been updated.
Appendix B.3	p. B.3-28	32	although	Revise this sentence, this word is not appropriate here.	This section has been updated.
Appendix B.3	p. B.3-28; and General Comment for entire Appendix B.3 and Section 3.2.3	33	884 to 1433 meters	Use feet.	Revised
Appendix B.3	p. B.3-29	10	occurs in three states	List the three states.	Revised
Appendix B.3	p. B.3-29 to B.3-30	28-38 and 1-23	Idaho Pepperweed	This species is better known in Idaho as slickspot peppergrass; consider changing the name and be consistent throughout the document. It is listed as slickspot peppergrass in Table 3-36. This species is not currently "USFWS Threatened." It is Proposed Endangered and it is also an Idaho BLM special status plant.	This section has been updated in the Final EIS to discuss only species occurring in the 10-mile analysis corridor. Slickspot peppergrass is discussed in Section 3.2.3.4.
Appendix B.3	p. B.3-31	9	atrivity	Update to activity.	Revised
Appendix B.7	Part 4	n/a	Maps of Special Management Areas with Scenic-Quality Values	Consider changing the title of this map set to omit "with Scenic-Quality Values," as no scenic quality values are shown on these maps.	This map represents specific Special Management Areas (SMA) that include protection of scenic values. These SMAs are being referred to in this case as "Special Management Areas with Scenic Quality Values"
Section C Design Features					
Appendix C	Entire Appendix	n/a	n/a	Clarify that any design feature that is identified as applicable to construction and O&M may implicate Idaho Power's personnel, contractor, or both, since certain of that work will be contracted for.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	Entire Appendix	n/a	n/a	Clarify that the design features apply to activities on federal lands and not on private or state lands, unless required by state law or pursuant to private landowner right-of-way agreement. *See* Idaho Power Comment Regarding p. 2-29, line 6-18 (discussing the limits of BLM's jurisdiction over private and state lands). Idaho Power recognizes that certain design features may be applied to private lands as reasonable and prudent measures resulting from the forthcoming ESA Section 7 consultation. However, those measures will be included in the incidental take statement, if any, separately from Appendix C.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-3	SW-7	Apply BMPs from Instruction Memorandum OR-2011-074: Best Management Practices to Reduce Sediment Delivery from BLM Roads in Oregon.	Not all BMPs in Instruction Memorandum OR-2011-074 would be applicable to the Project. Clarify which of the BMPs would apply. The BMPs are relevant to construction and not O&M activities. Delete the column entry indicating that SW-7 would apply to the O&M phase of the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-4	SPC-1	A spill prevention containment countermeasures (SPCC) plan would be prepared and implemented as applicable for this project and would detail protective measures to prevent and contain oil and other petroleum products spills and leaks.	The SPCC plan pertains to construction only. Therefore, delete the column entry indicating that SPC-1 would apply to the O&M phase of the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-4	SPC-2	Construction spills would be promptly cleaned up and contaminated materials would be transported to a disposal site that meets local, state, and federal requirements.	"Construction spills" apply to construction activities per se. Therefore, delete the column entry indicating that SPC-2 would apply to the O&M phase of the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-5	SPC-10	Hazardous material would not be drained on to the ground or into streams or drainage areas. Totally enclosed containment would be provided for all Project generated trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, concrete curing fluid, and toher potentially hazardous materials would be removed as necessary to a desposal facility authorized to accept such materials.	First sentence creates a provision to address an activity that is illegal, which seems unnecessary. Second sentence is already provided for in the remainder of the text. Suggest revision: "~~Hazardous material would not be drained on to the ground or into streams or drainage areas. Totally enclosed~~ containment would be provided for all Project generated trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, concrete curing fluid, and toher potentially hazardous materials would be removed as necessary to a disposal facility authorized to accept such materials."	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.

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Appendix C	C-5	REC-1	Qualified company personnel and contractors would facilitate avoidance of noxious weed infestations where possible and identify new infestations (see Appendix G of the Construction POD).	Consider whether this Design Feature is applicable to the Construction phase of the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-8	REC-16	Vegetation not consistent with minimum clearance distances between trees and transmission line must be maintained for line safety and reliability (Required by North American Electric Reliability Corporation's Transmission Vegetation Management Program).	Suggest revising the sentence as follows: "Vegetation not consistent with minimum clearance distances between trees and transmission line must be maintained for line safety and reliability, as r(~~R~~equired by North American Electric Reliability Corporation's Transmission Vegetation Management Program).	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-10	TR-15	Limit the number of vehicles on site to those necessary to perform, monitor, and inspect work.	This design feature should be deleted as it is ambiguous and unenforceable because it does not provide any particular performance standard. Further, Idaho Power does not have authority to enforce access limitations on public lands and access on private lands is subject to landowner and not Idaho Power's control.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-10	TR-16	Place "Wildlife Crossing" signage where applicable (e.g. near leks, brood-rearing habitat), to increase awareness of birds and wildlife in the area and encourage safe and responsible speeds. This may reduce direct loss due to vehicle collision.	Idaho Power does not have the authority to place permanent signs on private or public road ROWs without landowner approval. If the design feature is inspirational, it should be re-written to clarify the same.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-14	AGRI-10	In cultivated agricultural areas, soil compacted by construction activities would be de-compacted.	Remediation on agricultural lands will be subject to agreement by the landowner. This design feature should be amended to read: "In cultivated agricultural areas, soils compacted by construction activities will be de-compacted, subject to landowner approval." Consider whether this Design Feature is applicable to the Construction phase of the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-15	NOISE-2	Establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers.	Replace "Establish" with "Provide."	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-16	NOISE-3	Transmission line materials that have been designed and tested to minimize corona would be used. A bundle configuration and larger conductors would be used to limit audible noise, radio interference, and television interference due to corona. Tension would be maintained on all insulator assemblies to ensure positive contact between insulators, thereby avoiding sparking. Caution would be exercised during construction to avoid scratching or nicking the conductor surface, which may provide points for corona to occur.	These provisions apply to construction activities only. Therefore, delete the column entry indicating that NOISE-3 would apply to the O&M phase of the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-20	OM-30	Towers and/or conductors and/or shield wires would be marked with high-visibility devices (i.e., marker balls or other marking devices) where required by governmental agencies with jurisdiction (i.e., Federal Aviation Administration). All tower heights would be less than 200 feet to avoid the need for aircraft obstruction lighting.	The second sentence appears to make the first irrelevant. Suggest the following change: "Towers and/or conductors and/or shield wires would be marked with high-visibility devices (i.e., marker balls or other marking devices) where required by governmental agencies with jurisdiction (i.e., Federal Aviation Administration). ~~All tower heights would be less than 200 feet to avoid the need for aircraft obstruction lighting.~~"	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-21	PRC-8	Special status species, threatened and endangered species would be considered in accordance with management policies set forth by appropriate land-management agencies (i.e. BLM, USFS, USFWS, ODFW, IDFG, etc.). This would entail conducting pre-construction surveys for plant and wildlife species of concern along the Proposed Action and alternative, and associated facilities as agreed on by the agencies. In cases where such species are identified,	The text does not accurately describe the process for considering the identified species categories. Suggest modification of text to: "~~Special status species, threatened and endangered species would be considered in accordance with mangament policies set forth by appropriate land management agencies (i.e. BLM, USFS, USFWS, ODFW, IDFG, ETC). This would entail conducting~~ Pre-construction surveys for special status, threatened, or endangered plant and wildlife species ~~of conern~~ will occur along the approved route ~~Proposed Action and alternative~~ and associated facilities as set forth in the Biological	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.

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			appropriate action would be taken to avoid adverse impacts on the species and its habitat. These actions may include altering the placement of roads or towers, where practicable as approved by the landowner and compliance inspection contractor, as well as monitoring activities, implementation of Project speed limits and other restrictions.	Survey Work Plan developed for the Project.~~as agreed on by the agencies.~~ Pre-construction surveys will inform micro-siting decisions consistent with spatial and temporal restrictions contained the Species Conservation Plan developed for the Project~~. In cases where such species are identified, approaree action would be taken to avoide adverse impacts on the specis and its habitat. Thsese actions may include altering the placement of roads or towers where proacticalbe as approved by the landowner and compliance inspection contractor, as well as monitoring activities, implementation of project speed limits and other restrictions~~."	
Appendix C	C-21	PRC-9	Apply seasonal and spatial restrictions for blasting for sensitive wildlife species, such as Greater Sage-Grouse, raptors, and migratory birds.	This design feature should be included as a Blasting design feature.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-22	PRC-10	Avoid activities that could result in new noise levels at the perimeter of a lek above 10 dBA from 6:00 p.m. to 8:00 a.m. during the breeding season (March 1 – May 31).	Clarify that noise impacts will be measured against ambient noise levels by revising the design feature to state "Avoid activities that could result in ~~new noise levels at the perimeter of a lek above~~ an increase greater than 10 dBA at the perimeter of a lek from 6:00 pm to 8:00 am during the breeding season (March 1 – May 31)."	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-22	PRC-12	Identify and implement seasonal timing stipulations/restrictions for construction work. Consult federal land use plans and state sage- grouse conservation plans and/or strategies for specific dates and times. . . .	This design feature is too broad to design the project to or enforce. It needs to reference very specific types of work and requirements to be applicable.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-22	PRC-13	Where priority sage-grouse habitat cannot be avoided, implement no-disturbance buffers around leks and nesting habitat during breeding/nesting season.	The design features should recognize that activities around leks and nesting habitat are not prohibited entirely, provided such impacts are mitigated. Therefore, the no-disturbance requirement should be qualified to recognize that activities around leks and nesting habitat may be authorized if the impacts are mitigated.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-23	PRC-14	Minimize disturbance/removal of vegetation beneficial to sage-grouse (e.g. sage brush, forbs, and native grasses) in priority habitat by:	Use the term "PPH" and not "priority habitat." Suggest deleting 2nd bullet. Pulling and tensioning will be required within CORE/PPH habitat, but will be performed from the road network established for the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-23	PRC-17	In Greater Sage-Grouse PPH, vehicles will be limited to existing roads to prevent damage to Greater Sage-Grouse nesting areas.	The design features should recognize that activities in PPH are not prohibited entirely, provided such impacts are mitigated. Thus, the prohibition against new roads in PPH should be qualified to recognize that new roads may be authorized in PPH if the impacts are mitigated.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-23	PRC-18	Any wetland or ponded areas with suitable Columbia spotted frog (DPS) habitat will be surveyed, during the appropriate time frame, prior to construction activities or any activities potentially impacting spotted frog habitat.	Re-write this design feature to reference pre-construction surveys or site a specific protocol survey requirement and reference the protocol. As written this feature is too vague to allow for efficient construction planning/phasing.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-24	PPC-1	Surface disturbance would be allowed in potential slickspot peppergrass habitat, but where ground surveys 1-year prior to construction have determined no populations or habitats are present.	This species it isn't known to occur within the analysis area. Recommend this design feature be stricken from the document.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-24	PPC-2	Surface disturbance would be allowed in potential Howell's Spectacular Thelypody habitat, but only where ground surveys have been completed consecutively 1 to 3 years prior to construction and it has been determined no populations are present.	Suggest this design feature be written to identify a specific survey requirement rather than a 1-3 recommendation. If the requirement is greater than 1 year, cite the source of the requirement. As written, this design feature is not specific enough to provide clear direction.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.

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Appendix C	C-24	VIS-1	Dull-galvanized steel for lattice towers and either dull-galvanized steel or self-weathering steel for H-frames, along with nonspecular conductors, would be used to reduce visual impacts. In landscapes where the lattice towers would be seen against a terrain backdrop, color treatments would be applied to the steel to create a mottled, medium to dark brown color that would be effective in reducing color contrast created by the metal surfaces.	Delete the following sentence from the design provision: "In landscapes where the lattice towers would be seen against a terrain backdrop. " This sentence is too vague to recommend a specific tower location because it doesn't reference a specific analysis location and views of any particular tower may be backdropped depending on the viewing platform. Replace with language that ties visual treatment to locations where significant visual impacts from a specific analysis platform require mitigation as per BLM/State of Oregon standards.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-25	VIS-2	To the extent practicable, existing roads would be used in their current condition (without modification) to provide access for Project construction and operation. Existing roads would be improved or upgraded where necessary to provide safe, reliable means for Project access. New roads would be constructed only where existing roads or overland travel cannot provide suitable means for Project access. To the extent practicable, new access roads would be located to follow landform contours, to minimize the need for cutting and filling of slopes, side-casting of material from cuts, and the associated scarring of the landscape.	This design feature should be identified for construction only. The access road network proposed for the project is designed to be sufficient for all O&M needs. Construction of new access roads would not be proposed for the O&M phase. Therefore, delete the column entry indicating that VIS-2 would apply to the O&M phase of the project.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-25	AQ-4	Only herbicides approved by the land-managing agency as safe to use in aquatic environments and reviewed by Idaho Power for effectiveness would be used within 100 feet of aquatic resources.	Design feature should simply state that all herbicide treatments will be consistent with the label, as per EPA requirements. The label is the law.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-26	AQ-6	If specified by the jurisdictional agency, channel spanning structures would be designed and constructed to cross waterbodies identified as containing a sensitive fish species. The channel spanning structures would include installation of a large diameter culvert, arch culvert or shot span bridge with a stable road surface established over the structure for vehicle passage. Channel spanning structures would be designed and installed under the guidance of a qualified engineer who, in collaboration with a hydrologist and aquatic biologist would recommend placement locations; structure gradient, height, and sizing; and proper construction methods.	Design, permitting, approval and specification of materials for all channel spanning structures will all be performed during the design phase of the project and will not be modified during the construction phase of the project. All activities will be directed by qualified and licensed engineer. This provision should apply to the design phase only and the following text should be deleted as it applies to construction and not design: "~~Channel spanning structure would be designed and installed under the guidance of a qualified engineer who, in collaboration with a hydrologist and aquatic biologist, would recommend placement locations, structure gradient, height, and sizing and proper construction methods~~."	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix C	C-26	AQ-7	As written	Suggest editing the design feature to read: New stream crossing that occur on fish bearing streams must adhere to ODFW and IDFG fish passage design standards.	Based on comments received on the Draft EIS, design features of the B2H Project for environmental protection and selective mitigation measures are included in the Final EIS (Section 2.5.1.1). These environmental protection and selective mitigation measures summarize what was contained in Appendix C of the Draft EIS. Appendix C as it was in the Draft EIS has been removed and is no longer included in the EIS.
Appendix D Supporting Data for Wildlife Resources					
Appendix D	p. 2	Last paragraph	Idaho Power has stated that they intend to prepare at least two CMPs to address impacts to terrestrial and aquatic species and their habitats (Table 1).	Define CMP acronym: "Idaho Power has stated that they intend to prepare at least two Compensatory Mitigation Plans (CMPs) to address impacts to terrestrial and aquatic species and their habitats (Table 1)."	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C).
Appendix D	p. 3/Table 1	n/a	Howell's spectaculary thelypody	Clarify that Idaho Power will pursue measures that would avoid or minimize impacts to Howell's spectaculary thelypody and not require compensatory mitigation. Thus, it's possible that no compensatory mitigation plan would be required for impacts to the plant.	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C). Any compensatory mitigation for ESA-listed species will be addressed through the Section 7 consultation process and included in the ROD.
Appendix D	p. 5	G. Baseline and Additionality	Baseline conditions will be based off of the EIS analysis.	Provide that Idaho Power may conduct site-specific analysis to confirm the baseline conditions set forth in the EIS and such information may be used in development of the CMP.	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C).
Appendix D	p. 6	First Paragraph	Merely maintaining existing conditions on proposed mitigation sites, even if such conditions support species needs, does not result in true offsets to Project impacts, as an overall net loss to the species would remain. For this reason, acquisition and protection of a site as the sole conservation action	In the BLM 2013 draft MS-1794 policy, it states (Page 1-5): "Mitigation outside the area of impact occurs by replacing or providing similar or substitute resources or values through restoration, enhancement, creation, or preservation." Preservation is defined as (Page 1-5): "Preservation is the permanent	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C).

Table K1-1. Idaho Power Company Comments on the Draft Environmental Impact Statement					
Section	**Page/Figure/ Table Number**	**Line Number**	**Text from DEIS**	**Comment**	**Response**
			will typically not result in adequate mitigation; additional restoration and enhancement actions will most often be necessary.	or long-term protection of important resources or values through the implementation of appropriate legal and physical mechanisms (i.e., conservation easements, title transfers, or land use plan decisions). This includes the reduction or exclusion of incompatible uses." The language on Page 6 of this Framework seems to contradict the draft policy which is cited throughout this Framework. Recommend modifying language to more accurately reflect that preservation of important habitat is considered mitigation by the BLM and can be pursued by Idaho Power as one of many potential mitigation actions.	
Appendix D	p. 8	Second to last paragraph	Approaches such as sound propagation, distance-based disturbance bands, habitat weighting, and ratios are acceptable, especially in conjunction with defined thresholds of allowable impact in defined geographies.	Currently, there are no defined thresholds of allowable impact in defined geographic areas. Recommend removal of "~~especially in conjunction with defined thresholds of allowable impact in defined geographies~~" until those become available.	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C).
Appendix D	p. 11	First paragraph	..or indirectly through the reduction in habitat quality or increased predation due to the addition of enhanced hunting opportunities associated with transmission structures.	Clarify whether "enhanced hunting opportunities" refers to wildlife, humans, or both.	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C).
Appendix D	p. 13	V. Calculation of the Amount of Mitigation	The impact assessments pertinent to the Project include: 1. Determining Project-related transmission line impacts to biological resources based on "habitat disturbance" weightings and graduated distance bands that are parallel to the transmission line. 2. Determining Project-related road impacts to biological resources from new, improved and/or expanded existing roads based on "distance band" and "habitat disturbance" calculations. Road impacts are further weighted based on whether the Project's road use is low, moderate, or high traffic volume; and 3. Determining Project-related impacts due to direct or increased mortality of biological resources caused by collisions or enhanced predation.	#1 and #2 are the indirect impact mitigation calculations using "distance bands" and #3 discusses mortality. These are not the only impact assessments pertinent to the Project and mitigation calculation. Idaho Power should also be able to mitigate for direct removal or disturbance of habitat. This bullet list should describe direct impacts on habitat.	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C).
Appendix D	p. 13	Second to last paragraph	When distance bands for roads and transmission lines overlap, impacts will not be "double- counted." In other words, only new or expanded existing roads outside of the buffer used to calculate impacts from the transmission line will be assessed for impacts.	Clarify how this method is consistent with the ODFW 2012 Mitigation Framework's treatment of roads within the transmission line distance band.	Appendix D has been replaced with a revised Mitigation Framework (now Appendix C).
Appendix H Supporting Data for Cumulative Impacts					
Appendix H	H-3	n/a	n/a	Explain the metric and methods used for determining Landscape Character direct impacts. Was this based on the FG Landscape Character Impact presented in the summary tables for Direct Impacts?	The cumulative effects analysis methodology was modified based on comments received on the Draft EIS and to be consistent with other resource cumulative effect analyses.