Appendix K

Compensatory Mitigation Framework for the Morley Nelson Snake River Birds of Prey National Conservation Area

Gateway West Transmission Line Project
Compensatory Mitigation Framework for the
Morley Nelson Snake River Birds of Prey National Conservation Area

1 INTRODUCTION

As discussed elsewhere in the final supplemental environmental impact statement (FSEIS), the enabling legislation for Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP), Public Law (P.L.) 103-64, established the SRBOP in 1993 for the "…conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values." Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area.

As discussed in the FSEIS Chapter 3.0, the requirement for mitigation for impacts to the SRBOP's resources, objectives, and values, including compensatory mitigation for any remaining effects, would be consistent with the Bureau of Land Management's (BLM) management responsibilities under the Federal Land Policy and Management Act (FLPMA) and P.L. 103-64. The management approach would also be consistent with the Presidential Memorandum on mitigation, the Department of Interior (DOI) manual 600 DM 6 on landscape-scale mitigation (DOI 2015), and the BLM's interim mitigation policy (IM 2013-142 [BLM 2013]), which direct the BLM to avoid, minimize, and compensate for impacts. The BLM's policy manual on the management of National Conservation Areas (NCA; Manual Section 6220) also requires mitigation for impacts from rights-of-way (ROW). This mitigation standard of net benefit would comply with P.L. 103-64's requirement to enhance the resources, objects, and values of the NCA and it would also comply with the direction provided in the Presidential Memorandum on mitigation and DOI manual 600 DM 6 on landscape-scale mitigation to achieve a net benefit, when appropriate or required. DOI manual 600 DM 6 on landscape-scale mitigation states "landscape-scale strategies and plans identify clear management objectives for targeted resources…at landscape-scales, as necessary, including across administrative boundaries."

After assessment of the Rocky Mountain Power and Idaho Power Company (Proponents) Mitigation and Enhancement Portfolio (MEP) and in response to recently released policies concerning the requirements of mitigation for large landscape-scale projects, the BLM has developed this Compensatory Mitigation Framework (Framework) that would address avoidance, minimization and compensatory mitigation actions concerning the SRBOP. This Framework supersedes the MEP. In the Record of Decision, the Authorized Officer will determine if the Framework has met the enhancement standard in P.L. 103-64.

1.1 Framework Purpose and Objective

The Framework for the SRBOP is intended to analyze and facilitate the development of a Compensatory Mitigation Plan (CMP) to offset reasonably foreseeable remaining residual effects from the Gateway West Transmission Line Project (Project). The CMP cannot be developed until the selection of a route occurs and the Proponents complete final engineering and design. Only after the completion of final engineering and design can site-specific compensatory mitigation be determined to account for residual

impacts. Thus, the Framework is intended to be scalable and not specific to any alternative or site-specific mitigation project. With development and implementation of the CMP, the Proponents will be taking the necessary steps to compensate for residual Project impacts and achieve enhancement (i.e., net benefit) of resources and their values, services, and functions within the SRBOP as mandated by the enabling statute (P.L. 103-64).

The overall objectives of the Framework are to:

- create a common understanding regarding application of the mitigation hierarchy and expectations of the CMP between the Proponents and the BLM on the principles, standards, methods, time frames, and other considerations that will guide the development of the CMP; and
- provide clear expectations and methodology for assessing the adequacy of the CMP.

The Framework summarizes mitigation actions and planning undertaken by the BLM and the Proponents to prepare the final environmental impact statement (FEIS) and SEIS to ensure that the Project is in compliance with applicable laws, regulations, policies, and plans related to affected resources and their values, services, and functions. Additional resource protection guidance and recommendations have evolved over the course of the SEIS development and new information that has become available during the SEIS process has been incorporated into the SEIS analysis and mitigation development (see Chapter 1, Sections 1.1.1 and 1.2). The Framework summarizes how the SEIS analysis has followed existing agency mitigation strategies and the mitigation hierarchy.

The BLM and the Proponents will utilize this Framework in developing a Project-specific CMP proposal. The CMP will identify specific compensatory mitigation projects intended to offset Project impacts across all affected land ownerships and jurisdictions. Subject to BLM determination that the CMP is sufficient and that its implementation is consistent with applicable laws and government policies, the BLM will utilize the CMP to develop individual project authorizations (e.g., for the BLM, CMP implementation will be made a condition of ROW grants and permits issued to the Proponents). Any subsequent National Environmental Policy Act (NEPA) analysis required for CMP site-specific projects will be done on a case-by-case basis. Since the CMP's overall success may be dependent on the successful implementation of each CMP mitigation project component, the BLM would retain discretion to suspend or terminate its authorization in the event that any CMP mitigation project is not successfully implemented, regardless of that project's location or jurisdictional considerations.

The Framework has been cooperatively developed by resource specialists from the BLM and Proponents (see Contributors) intended to effectively guide the eventual development of the CMP(s) for the Proponents' Project Plan of Development (POD). The principles, standards, and technical elements within the Framework have been drawn from and are consistent with departmental and agency policy and guidance documents (BLM 2013; Clement et al. 2014; DOI 2015). Many of the mitigation actions and project types originated from elements in the Proponents' MEP and have been

expanded or revised based on analysis and recommendations from the Boise Resource Advisory Council, BLM subject matter experts, and public comment on the Draft SEIS.

1.2 The Mitigation Hierarchy

The FEIS and SEIS documents have been developed in accordance with current relevant laws, regulations, policies, and plans, including those guiding agency decisions that may have an impact on resources and their values, services, and functions. Project siting and design, required design features, selective mitigation measures, and implementation plans have been developed to consider the full mitigation hierarchy to avoid, minimize, rectify, or reduce impacts over time, and last, to compensate for residual impacts prior to issuing the Notice to Proceed.

The mitigation hierarchy is illustrated in Figure 1 and described below in general and in the context of the Project in particular:

Avoidance: Measures taken to avoid impacts altogether by not taking a certain action or parts of an action. Avoidance measures applied to the Project include, among other things, reviewing each route's potential impacts to sensitive resources prior to considering it for detailed analysis. Avoidance also includes more site-specific avoidance activities, such as those described in the Project Environmental Protection Measures (EPM). *See* Appendix M of the FSEIS. It is also expected that further avoidance will occur through the Proponents' final engineering and design if a route is selected. The intent of such actions is to avoid impacts to the SRBOP to the greatest extent possible while recognizing that all of the feasible routes will have some impact on the SRBOP.

The development of the route alignments is described in Chapter 2 of the FEIS and SEIS; the description provides the reasons why some were not selected for detailed study. Seven routes were considered for Segment 8 and 11 routes for Segment 9. Routing options in and near the SRBOP include, among others, alignments to avoid the SRBOP, non-motorized areas, crossings of the Snake River, sage-grouse habitat, historic trails, important archaeological areas, and populated areas. Routing also considered colocation within the West-wide Energy (WWE) Corridor. No feasible route was identified that would completely avoid the SRBOP. Any route south of the SRBOP in Idaho would have to cross designated wilderness and/or the Saylor Creek Air Force Range. Any route north and east of the SRBOP would cross several high-voltage transmission lines and/or the cities of Kuna or Boise.

The Project was designed to avoid sensitive resources to the extent practicable. For example, early on in the planning phase, cultural resources were identified. Proposed project roads were rerouted if it became clear they would impact a cultural site. Waterbody crossings were routed to avoid new crossings to the extent practicable. Avoidance of sensitive species and habitat was a key consideration in siting however; they could not be avoided given other siting constraints. Micro-siting and local rerouting of roads and alignments will be used to avoid disturbance to species and halting of

construction will occur if a new cultural site is discovered during construction. These measures are included in various resource EPMs, such as:

- CR-6: Avoidance areas will be flagged or otherwise marked prior to construction activities. Flagging or other marking will be removed once construction is completed in an area.
- WET-1: Impacts on wetland and riparian areas will be avoided unless physically or economically infeasible or where activities are permitted. Land management agencies' plans (RMPs, MFPs, and Forest Plans) that have standards, guidelines, stipulations, or avoidance buffers will be adhered to. Where these do not exist, Inland Fish Strategy (INFISH) buffers will be followed,
- VEG-4: Prior to the start of construction and maintenance activities, all contractor vehicles and equipment (including personal protective equipment) will be cleaned of soil and debris capable of transporting invasive plant seeds or other propagates. All vehicles and equipment will be inspected by Agency-approved inspectors and certified as weed free by agency approved personnel, in order to ensure they have been cleaned properly. The final Reclamation and Noxious Weed Plans will include the location of all cleaning stations, how materials cleaned from vehicles at these stations will be either captured or treated so that cleaning station locations would not also become infected, and who would confirm/certify that vehicles leaving cleaning stations and/or entering construction sites are free of invasive plant materials.
- TESPL-3: Qualified botanists shall conduct pre-construction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micro-siting of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to land management agency for approval prior to construction. Agency botanists may evaluate individual sites based on site specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction.
- TESWL-4: The Environmental Construction Inspection Contractor (CIC), an agency biologist, or agency designee will accompany the Construction Contractor site engineers during the final engineering design or prior to ground-disturbing activities to verify and flag the location of any known occupied structures (e.g., nests, burrows, colonies) utilized by sensitive species. This will include, but not be limited to, artificial burrows that have been constructed as part of research/restoration efforts, prairie dog colonies, and raptor nests, which could be impacted by the Project based on the indicative engineering design. The final engineering design will be "micro-sited" (routed) to avoid direct impact to these occupied structures to the extent practical within engineering standards and constraints.
- TESWL-9: Sage-grouse – On federal lands, surface disturbance will be avoided within 4 miles of occupied or undetermined greater sage-grouse leks from March 1 to July 15. This distance (i.e., 4 miles) may be reduced on a case-by-case

basis by the applicable agency, if site-specific conditions would allow the Project to be located closer to the lek than 4 miles (e.g., topography prevents the Project from being visible from the lek, or a major disturbance such as a freeway or existing transmission line is located between the Project and the lek).

Minimization: Measures taken to minimize impacts by limiting the degree or magnitude of the action and its implementations. Minimization measures taken by the Project include, for example, actions to decrease effects on wildlife species such as design components to lessen aerial collisions with the transmission lines and timing restrictions for construction and maintenance. Measures to prevent spread of weeds and shrink impacts of clearing have also been included in the Project actions. Minimization of visual impacts has informed Project routing and structural design to diminish impacts to important visual resources such as historic trails and scenic areas. Multiple EPMs designed to minimize impacts have been included as part of the Project and can be found in Appendix M of the FSEIS. It is also expected that further minimization methods will be implemented through the Proponents final engineering and design if a route is selected. Multiple EPMs designed to minimize impacts have been included as part of the Project, including:

- VIS-6: To minimize sensitive feature disturbance and/or visual contrast in designated areas on federal lands, structures will be placed so as to avoid sensitive features such as, but not limited to, riparian areas, water courses and cultural sites and/or to allow conductors to clearly span the features, within the limits of standard tower design. Where conflicts arise between resources, the applicable land manager will be consulted.
- VIS-7: To reduce visual impacts on federal land, including potential impacts on recreation values and safety, towers will be placed at the maximum feasible distance from the highway, canyon and trail crossings within limits of standard design and to the extent practical.
- WILD-3: The Project will be designed and constructed in compliance with Avian Power Line Interaction Committee (APLIC) standards (APLIC 2006, 2012) in order to reduce impacts to avian species. Any changes to the Project's design, as requested by federal, state, or local jurisdictions, as well as any changes considered by the Proponents, will also be in compliance with APLIC guidance.
- VEG-1: During construction, blading of native plant communities should be minimized, consistent with safe construction practices. Where feasible, shrubs should be cut at or near ground level to facilitate re-growth after construction. The footprint of construction and operations facilities should be kept to the minimum necessary.
- WILD-9: To the extent feasible, all vegetation clearing will be conducted to avoid the avian breeding season (generally April 15 through July 31, depending on local conditions and federal land management plan requirements) in order to minimize impacts to migratory birds. Where this is not feasible, pre-construction surveys within the disturbance footprint shall be conducted within seven days prior to clearing. If an active nest (containing eggs or young) of a bird species protected under the MBTA is found during either pre-construction surveys or

construction activities, the nest will be identified to species, inconspicuously marked, and left in place until any young have fledged before the vegetation is removed.

Rectification/Reduction or Elimination over time: Measures taken to rectify impacts by repairing, rehabilitating, or restoring the affected environment or by reducing or eliminating the impact over time by preservation and maintenance operations during the life of the impacting action. Rectification, reduction, and elimination measures adopted by the Project include identified EPMs (see Appendix M of the FSEIS) as well as Mitigation Plans for the Project. Example mitigation-oriented EPMs include:

- G-1: Resource Management Plan (as amended) design criteria, Best Management Practices (BMPs), and mitigation requirements will apply on BLM-managed lands.
- OM-15: To help limit the spread and establishment of noxious weed species in disturbed areas, desired vegetation needs to be established promptly after disturbance. The Proponents will rehabilitate significantly disturbed areas as soon as possible after ground-disturbing activities and during the optimal period. Seed and mulch will be certified “noxious weed free” and seed mix will be agreed to in advance by the landowner or land managing agency.
- CR-2: An Inadvertent Discovery Plan will be included as part of the HPTP. This plan will specify what steps will be taken if a subsurface cultural resource is discovered during construction, including stopping construction in the vicinity of the find, notification of the appropriate land management agency, identification of a qualified archaeologist to conduct an evaluation of the find, and the development of an approved data recovery program or other mitigation measures.
- CR-5: If construction will adversely affect any properties listed on, or eligible for listing on, the National Register of Historic Places (NRHP), mitigation will be required. Mitigation will be in accordance with the HPTP and may include, but not be limited to, one or more of the following measures: a) avoidance through the use of relocation of structures through the design process, realignment of the route, relocation of temporary workspace, or changes in the construction and/or operational design; b) the use of landscaping or other techniques that will minimize or eliminate effects on the historic setting or ambience of standing structures; and c) data recovery, which may include the systematic professional excavation of an archaeological site or the preparation of photographic and/or measured drawings documenting standing structures
- REC-20: Temporarily disturbed lands within the ROW will be re-contoured to blend with the surrounding landscape. Re-contouring will emphasize restoration of the existing drainage patterns and landform to pre-construction conditions, to the extent practicable. (Tower pads would not be recontoured.)
- WET-3: Where impacts on wetlands are not avoidable, site-specific crossing plans and measures to mitigate impacts will be submitted to the appropriate regulatory agency, as well as the land managing agency. The Proponents will

obtain all necessary permits prior to discharging dredged or fill material to waters of the U.S. and state.

Project design has involved careful routing and siting to avoid and minimize impacts to resources (e.g., residential areas, agriculture, vegetation, wildlife, cultural, visual, National Historic Trials, military training, etc.). Project design to avoid and minimize impacts to resources included avoiding important, scarce, and/or sensitive resources where possible; maximizing the use of existing utility corridors and roads; and closely paralleling existing transmission lines within these corridors. If an action alternative is chosen, additional measures to avoid and minimize impacts will take place during final engineering and design. Pre-construction micro-siting and variations may also provide further avoidance and minimization of impacts.

The EPMs in the FEIS were incorporated into the 2013 Record of Decision (ROD) and subsequently included in the Proponents' POD in August 2014 (see Appendix B). To ensure the Project's conformance with both federal and state regulatory requirements, the design of the Project and the development of EPMs have followed the hierarchy for mitigation and included avoidance, minimization and rehabilitation/restoration measures. EPMs will be incorporated into Project design to avoid or minimize environmental impacts of the proposed Project. The Proponents have committed to implementing these EPMs during construction, operation, and maintenance of the proposed Project. The EPMs will be reviewed, revised, and developed further, as appropriate, to reduce impacts to resources and their values, services, and functions and, along with explicit Implementation Plans, will be included in the POD for this Project. The POD will be reviewed and approved by the BLM. If the Project is authorized, the POD will be used by the agencies in crafting the ROW and other Project-related authorizations as appropriate. Consideration of the anticipated effectiveness of these EPMs incorporated into the FEIS and SEIS impact assessment will be taken into account during the identification and development of compensatory mitigation.

Compensatory Mitigation (also referred to as "offset"): Measures taken to compensate for impacts by replacing or providing substitute resources or environments. Compensatory mitigation inside the SRBOP boundary must offset residual impacts that cannot be avoided, minimized and/or rectified, reduced or eliminated, in order to achieve enhancement of resources and their values, services, and functions. Guidance for compensatory mitigation actions and projects will be discussed in detail and will be the primary focus of the remainder of this document.

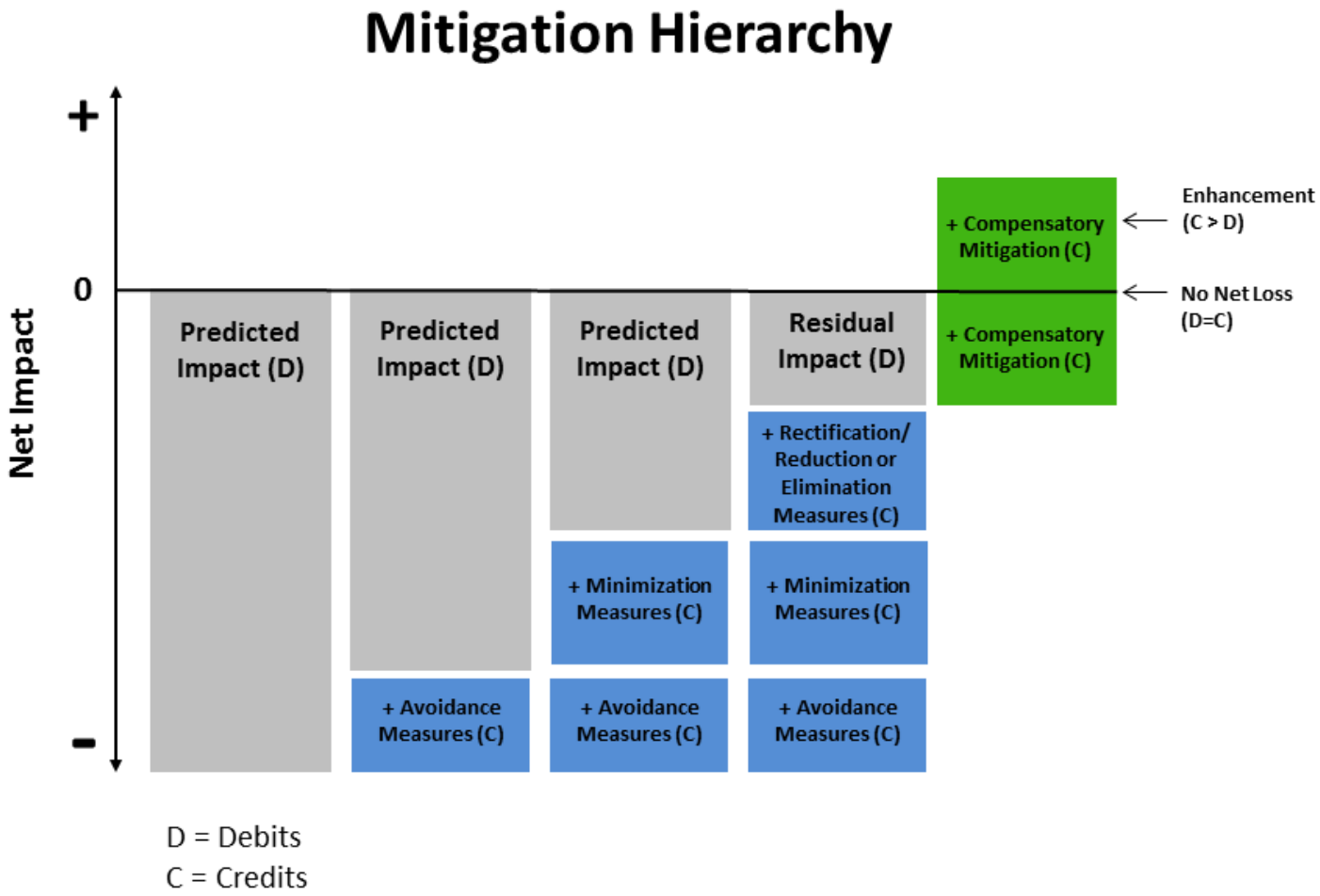

Figure 1. Mitigation Hierarchy

1.3 Compensatory Mitigation

Within the SRBOP, the CMP would achieve enhancement of resources as prescribed in the enabling legislation. The decision-maker will look at the totality of the CMP to determine whether these requirements will be met by the CMP.

Compensatory mitigation would be required to address foreseeable residual impacts (i.e., reasonably foreseeable effects that remain after the application of the first four steps of the mitigation hierarchy) to affected resources and their values, services, and functions from the Project.

The CMP, prepared in accordance with the framework, would demonstrate and ensure that mitigation measures and compensatory mitigation sites are durable, defined by outcomes, implemented and monitored for effectiveness, considered within an adaptive management framework, reported upon, managed by a responsible party, informed by the best available science, and developed through effective, early, and frequent communication with cooperating agencies and applicable stakeholders.

1.3.1 Principles, Standards, and Technical Elements

The following general compensatory mitigation principles, standards, and technical elements provide an introduction to components that should be included in the CMP. More detailed, Project-specific information is provided in the remainder of this Framework and will assist in the Proponents' development of the CMP. The following discussion provides the principles, standards, and technical elements the Proponents will consider when developing the CMP and will direct the development of the CMP with regard to the following:

- Landscape-scale Approach
- Best Management Practices
- Durability
- Mitigation Measures' Outcomes and Performance Standards
- Effectiveness Monitoring
- Adaptive Management
- Reporting
- Responsible Parties
- Best Available Science
- Communication: Transparency, consistency, and participation

The CMP would include BMPs that are state-of-the-art, efficient, appropriate, and practicable mitigation measures for avoiding, minimizing, rectifying, and reducing or eliminating impacts over time.

The CMP would demonstrate where applicable that mitigation measures and compensatory mitigation sites are durable for the duration of the impacts resulting from the Project. Durability includes three types of considerations for mitigation measures

and for compensatory mitigation sites: resource, administrative, and financial. Resource considerations for durability include, but are not limited to, ensuring that mitigation measures and/or compensatory mitigation sites achieve and maintain their required outcomes, including being resilient to foreseeable change agents (e.g., wildland fire, invasive species) for the duration of the impacts. Administrative considerations for durability include, but are not limited to, actions that limit or exclude land use activities that are incompatible with mitigation measures and/or compensatory mitigation sites, such as those required by permit terms and conditions, land use planning, or legal designations. Financial considerations for durability include, but are not limited to, ensuring there will be financing sufficient to maintain, monitor, and adaptively manage mitigation measures and/or compensatory mitigation sites for the duration of the impacts from the Project.

The CMP would clearly articulate the duration of the impacts from the Project and ensure that compensatory mitigation measures and sites are addressing the impacts for an equivalent period of time. At a minimum, the duration of compensatory mitigation measures should extend until the residual effects have been restored. In addition, the CMP would demonstrate (e.g., through financial assurances) that the responsible party for a mitigation measure and/or a compensatory mitigation site will maintain the mitigation's durability. The CMP would articulate that the responsible party is obligated to correct any loss of durability (i.e., a reversal), except if the BLM determines that the loss of durability was caused by a force majeure event (i.e., an event that cannot be reasonably anticipated or controlled, such as natural disasters outside of a predicted range of disturbance, additional governmental restrictions, etc.).

The CMP would establish clearly defined and measurable outcomes for those compensatory mitigation measures, although it may also be necessary to establish minimum actions (i.e., outputs) that would be taken in order to achieve those outcomes. The CMP would also develop performance standards that will be used to monitor and assess the effectiveness of compensatory mitigation measures. Mitigation measures' outcomes should support the resource objectives of the SRBOP Resource Management Plan (RMP) and/or the objectives of other federal agencies, Tribal, state, and/or local governments. The CMP would provide performance standards that will be used to monitor and assess the effectiveness of the compensatory mitigation measure in achieving the required outcome. The same or compatible methods, including metrics, as used to identify resource objectives and/or used to measure the reasonably foreseeable impacts of the Project should be used to design the performance standards in order to be able to best measure the effectiveness of the mitigation measures for those impacts.

The CMP would identify and provide protocols to ensure that mitigation measures are monitored in order to verify the required outcomes are being achieved and/or for ensuring that specific adaptive management requirements are being implemented. The CMP would identify the type, extent, and duration of effectiveness monitoring for mitigation measures, as guided by the degree of uncertainty associated with a mitigation measure, the amount and type of the mitigation measure, and the potential need for adaptive management. The CMP would identify the party responsible for conducting effectiveness monitoring and, if necessary, the Proponents would enter into

a formal and binding agreement with the BLM or another entity to conduct the effectiveness monitoring. Effectiveness monitoring should be designed around the same or compatible methods, including metrics, as used to identify resource objectives, measure the reasonably foreseeable impacts of the Project, and/or define the mitigation measure's outcome and performance standards. The financial cost of implementation and effectiveness monitoring will be the obligation of the responsible party. These costs will be included in the determination of the amount of compensatory mitigation.

The CMP would clearly articulate adaptive management provisions that respond to lessons learned from scientific research, implemented mitigation measures, and associated effectiveness monitoring. The responsible party will be required to implement adaptive management of mitigation measures to reduce uncertainty and achieve the required mitigation outcomes.

Individual site-specific projects would describe reporting procedures that include preparation and submission of periodic reports to the appropriate BLM office on the implementation and effectiveness of the mitigation measures. Monitoring reports should typically consist of written summaries, implementation and effectiveness monitoring data in order to verify that mitigation measures are being implemented as required in the land use authorization and that the required outcomes are being achieved and/or for ensuring that specific adaptive management requirements are being implemented. The BLM will use these reports to help determine if the responsible party needs to complete any necessary corrective actions or adaptive management in order to achieve the required mitigation outcomes.

The CMP would identify a responsible party accountable for fulfilling all aspects of mitigation obligations including, but not limited to, ensuring the durability and effectiveness of mitigation measures, achieving mitigation measures' outcomes, and complying with monitoring, adaptive management, and reporting requirements.

The CMP would use the best available science (e.g., peer-reviewed research and methods, scientifically robust monitoring data and modeling results, well-documented case studies, etc.), to inform the identification and analysis of reasonably foreseeable impacts and mitigation for those impacts. For compensatory mitigation obligations, it may be appropriate to include scientific studies/inventories that can aid in determining the appropriate type, duration, and amount of compensation. Generally, scientific studies/inventories, on their own, should not be considered compensation, unless the studies/inventories directly offset the impact or are necessary to inform the maintenance, monitoring, and/or adaptive management of the compensatory mitigation measures, or otherwise directly benefit the management of the impacted resources.

Because the BLM has determined that compensatory mitigation is warranted for impacts within the SRBOP, the BLM has established a mitigation standard of enhancement (i.e. net benefit) to comply with the enabling statue and achieve resource objectives. The CMP would identify and describe how it intends to achieve the mitigation standard, and what metrics and accounting system, whether qualitative (e.g., subjective and/or intuitive) or quantitative metrics, will be used. Guidance for the development of metrics and accounting systems are provided in the resource component sections below.

The Proponents' compensatory mitigation obligation would be commensurate with the reasonably foreseeable residual effects from the Project's impacts and the compensatory mitigation measures would demonstrate the appropriate level of timeliness and be additional. The CMP will ensure that any compensatory mitigation obligation is reasonably related and proportional to the reasonably foreseeable residual effects from the Project (i.e., commensurate). The type of compensatory mitigation should have a reasonable relationship to the Project's reasonably foreseeable residual effects, which can include both in-kind and out-of-kind compensatory mitigation measures. The BLM will evaluate the types of compensatory mitigation measures based on their ability to provide the maximum benefit to the impacted resources. In addition, the amount of compensatory mitigation should be proportional to the Project's reasonably foreseeable residual effects. Proportionality includes factors such as the quality of the resource (at both the impacted site and compensatory mitigation sites), the timeliness of the compensatory mitigation measure, the risk of a measure's failure, and the established mitigation standard (i.e., enhancement/net benefit).

Compensatory mitigation measures would demonstrate the appropriate level of timeliness. The CMP would describe when the measure's outcomes will be achieved. The BLM's general preference is that compensatory mitigation outcomes be achieved in advance of the Project's impacts. The implementation of this preference is dependent on the urgency of the compensatory mitigation needs, the amount and type of the compensatory mitigation measures, and the financial capability of the Proponents. The BLM may allow for the Projects' residual effects to precede the achievement of compensatory mitigation outcomes. However, the CMP would need to account for the increased uncertainty and the time-value of delayed benefits during the determination of the compensatory mitigation obligation.

Compensatory mitigation measures would improve upon the baseline conditions of the impacted resources, be demonstrably new, and establish that they would not have occurred without compensatory mitigation (i.e., additional). The CMP would ensure that compensatory mitigation measures are in addition to any existing and funded investments, or any foreseeably expected investments, that benefit the same resources at the same compensatory mitigation site (i.e., financial additionality). The CMP would also ensure that compensatory mitigation measures improve upon the baseline conditions of the impacted resources beyond the conditions that would have happened without the compensatory mitigation (i.e., resource additionality).

In summary, at a minimum the CMP should contain:

1. type of resource(s) and/or its values(s), service(s), and function(s), and amount(s) of such resources to be provided (usually expressed in acres or some other physical measure), the method of compensation (restoration, establishment, preservation, etc.), and the manner in which a landscape-scale approach has been considered;
2. factors considered during the compensatory mitigation site selection process;
3. compensatory mitigation site protection instruments to ensure the durability of the measure;

4. baseline information;
5. the mitigation value of such resources, including a rationale for such a determination;
6. a mitigation work plan including the geographic boundaries of the measure, construction methods, timing, and other considerations;
7. a maintenance plan;
8. performance standards to determine whether the compensatory mitigation measure has achieved its intended outcome;
9. monitoring requirements;
10. long-term management;
11. adaptive management commitments;
12. financial assurance provisions that are sufficient to ensure, with a high degree of confidence, that the compensatory mitigation measure will achieve and maintain its intended outcome, in accordance with the compensatory measure's performance standards, and;
13. potentially additional information as necessary to determine appropriateness, practicability, and equivalency of compensatory mitigation projects, particularly as they relate to the principles, standards, and technical elements described above.

1.3.2 Preparation, Implementation, Management, and Monitoring

Preparation of the CMP will involve discussions, collaboration, and coordination between the Proponents and the BLM. This coordination may include the establishment of an ad-hoc "Working Group" comprising the Proponents and BLM representatives. Involvement by county, state, and federal agencies with jurisdiction over the Project will ensure that the CMP is sufficient and consistent with applicable laws and government policies.

The CMP would include a schedule detailing the sequence for implementing the restoration of temporarily and permanently impacted areas caused by construction of the Project and the sequencing of proposed compensatory mitigation actions including timeframes for securing compensatory mitigation lands and for implementing mitigation actions on those lands.

The BLM with the assistance of the CMP Working Group, if formed, will establish the timeframes for which they will have each mitigation action attain its full mitigation credit (e.g., restoration of habitat values, land acquisition, etc.) as required to compensate for the Project's impacts. Specific criteria will need to be developed that describes and measures the success and failure of each the mitigation action. The desired ecological outcomes will be based on the results of the impact assessment and ecological evaluation, both referenced earlier in this document, with an overall goal of achieving an enhancement/net benefit for the resources and their values, services, and functions through implementation of the CMP.

The CMP would include an overall management plan for all the compensatory mitigation actions that details how mitigation actions and or initiatives will be managed and how enhancement actions will be implemented and monitored. The Proponents, or other identified responsible parties, will be responsible for monitoring and reporting to the BLM whether mitigation and the associated management actions are implemented as stated in the CMP ("implementation monitoring") and immediately address any inconsistencies, in coordination with the BLM. The Proponents will also be responsible for monitoring and reporting to the BLM the response of affected resources at the construction impact sites as well as at mitigation action sites to confirm the targeted resource outcomes are being achieved ("effectiveness monitoring"). Monitoring will also be used to identify mitigation actions that are not achieving the desired result and remedial actions will be developed and implemented.

The CMP would include scientifically accepted monitoring methods and a detailed regime for monitoring and assessing attainment of targeted ecological outcomes, over the life of Project impacts. The Proponents will be responsible for reporting the monitoring findings and recommendations for a specified time period, as required by the federal permitting process for the duration of the mitigation effort(s) as determined by evaluated success of the mitigation. The report will describe all mitigation and management actions carried out during the reporting year, and all remedial management work performed in response to monitoring actions. The report will include an evaluation of mitigation success in meeting ecological targets (i.e. outcomes), and a description of the methods used to perform the evaluation.

The BLM will track the monitoring reports to determine if actions and outcomes are consistent with applicable law, the CMP, the FEIS, the ROD(s), and their respective Project authorizations including ROWs and permits. The agencies will work cooperatively to identify and address inconsistencies. Each agency will reserve the ability to take all measures available under law and regulation to ensure compliance with the terms and conditions of its respective authorization.

Table 1. Coordination and Actions taken to Comply with the Mitigation Hierarchy

Coordination/Action	Project Component	Reference to Discussion	Summary
Project Design	FEIS Alternatives	FEIS 2.2	Alternative Development: Discusses why certain alternatives were developed and why they were preferred alternatives or other alternatives
		FEIS 2.4	Route Action Alternatives: Discusses specifics for each route alternative: ▪ 2.4.1.1 lists the BLM Preferred Alternatives for each segment: Each alternative states what factors informed routing, such as being within the WWE corridor, paralleling existing lines, rebuild of existing lines instead of additional lines, complying with sage-grouse core directive, avoidance of importance historical sites, avoidance of important wildlife areas, etc. Specific avoidance actions are listed under each Segment and Alternative. ▪ 2.4.1.8 lists Twin Falls County Preferred Alternatives ▪ 2.4.1.9 lists Owyhee County Preferred Alternatives ▪ 2.4.1.10 lists Idaho Army National Guard Preferred Alternatives: Segment 8 – to avoid adversely affecting training (ground maneuver and aerial compact training operations) in the Orchard Combat Training Center. ▪ 2.4.2 – 2.4.11 discuss all alternatives for each Segment, where they are located, and what factors were considered in their development
	SEIS Alternatives	SEIS 2.3	Alternative Development: Sub-sections describe Segments and routes and some of the routing criteria used: ▪ SEIS 2.3.3 Action Alternatives Considered in the SEIS – Describes the different alternatives ▪ SEIS 2.3.4 BLM Preferred Alternatives ▪ SEIS 2.3 No Action Alternative ▪ SEIS 2.5 Other Routes Considered – Describes other routes and factors leading to them not being considered in detail; such as not being economically feasible, causing excessive impacts to private property, crossing more sensitive resources than other alternatives with no clear beneficial trade-off, other resource concerns, or being very similar to routes already analyzed
	Alternatives Considered and Eliminated	FEIS 2.4.12	Describes Alternatives Eliminated from Detailed Study for each segment. This section describes each alternative, where it would be located, and reasons for elimination from further study such as: ▪ Substantially longer route (often times resulting in more effects on sensitive resources) ▪ Steep slopes

Table 1. Coordination and Actions taken to Comply with the Mitigation Hierarchy (continued)

Coordination/Action	Project Component	Reference to Discussion	Summary
			Substantially more effect on sensitive resources (such as big game crucial range, sage-grouse core habitat, raptor nests, historic trails and other cultural resources, visual resources, wetlands, conservation areas or other special designation areas) ▪ Extensive greenfield development ▪ Does not meet reliability requirements ▪ Crossing more forested habitat ▪ Crossing densely populated areas ▪ Constraints due to existing utility development ▪ Increased impacts to agriculture
		SEIS 2.5.3	Discusses Other Routes/Alternatives Eliminated from Detailed Study
Required Design Features	FEIS	FEIS Table 2.1-2	Summary of Project Facilities
		FEIS 2.3	Substation Alternatives: ▪ Describes substations, construction components and needed improvements to existing infrastructure
		FEIS 2.6	Design Alternatives: ▪ Describes alternatives to the various components, such as structure design (2.6.1), structure finish and surface treatment alternatives (2.6.2), underground alternatives (2.6.3)
		FEIS 2.7	Components common to all action alternatives: ▪ Describes components (2.7.1) for system construction (transmission line, communication system, access roads, multipurpose yards, fly yards, substations) (2.7.2), operations and maintenance (2.7.3), and decommissioning (2.7.4).
		FEIS Table 2.7-1	Proposed Environmental Protection Measures (This is not called out as design features in the FEIS but is referred to as design features by chapters in the SEIS)
	SEIS	SEIS 2.2.1	Transmission Line Substation Facilities
		SEIS Table 2.2-2	Summary of Project Facilities
		SEIS 2.6	Design features, including proposed MEP and EPMs
		SEIS Chapter Sections 3.X.2.5	Proponent-Proposed Design Features and Measures
Selective Mitigation Measures	FEIS	FEIS 2.7.5	Proposed EPMs and Agency Mitigation Measures
		FEIS Table 2.7-1	Proposed Environmental Protection Measures

Table 1. Coordination and Actions taken to Comply with the Mitigation Hierarchy (continued)

Coordination/Action	Project Component	Reference to Discussion	Summary
		FEIS Chapter Sections 3.X.2.2	Avoidance, minimization, and mitigation measures are discussed for the various resources in the appropriate section
		FEIS 3.11	Special Status Wildlife and Fish ▪ 3.11.1.4 Page 3.11-12 through 3.11-25; Page 3.11-18: TESWL-2 ▪ 3.11.2.2 – Avoidance, minimization, and mitigation measures are discussed throughout this section for each species. Also, refer to table 2.7-1
		FEIS Appendix C	Mitigation Plans ▪ C-1 Historic Properties Treatment Plan ▪ C-2 Draft Framework for Compensatory Mitigation for and Monitoring of Unavoidable impacts to Waters of the U.S. ▪ C-3 Greater Sage-grouse Avoidance, Minimization, and Mitigation Measures
		Appendix I	Wildlife Stipulations
		Appendix J	Sage-Grouse Impact Analysis
	SEIS	SEIS 2.3.1.3	Proponent-Proposed Mitigation and Enhancement Portfolio
		SEIS 2.6	Design features, including Proposed MEP and EPMs ▪ Table 2.6-1 Summary of mitigation proposals applicable to Segments 8 and 9 Revised Proposed Routes ▪ 2.6.1 Additional BLM Mitigation Categories
		SEIS Chapter Sections 3.X.2.5	Proponent-Proposed Design Features and Measures
		SEIS Chapter Sections 3.X.2.6	BLM Compensatory Mitigation Measures
		SEIS Appendix C	Proponents' Mitigation and Enhancement Portfolio
Implementation Plans	FEIS	FEIS POD Volume I	▪ Appendix C: The Environmental Compliance Management Plan ▪ Appendix D: Reclamation and Framework Plan ▪ Appendix E: Framework Noxious Weed Plan ▪ Appendix F: Framework Storm Water Protection Plan ▪ Appendix G: Framework Spill Prevention, Containment, and Countermeasures Plan ▪ Appendix H: Plant and Wildlife Conservation Measures Plan ▪ Appendix I: Framework Stream, Wetland, Well, and Spring Protection Plan ▪ Appendix J: The Framework Paleontological Resources Protection Plan

Table 1. Coordination and Actions taken to Comply with the Mitigation Hierarchy (continued)

Coordination/Action	Project Component	Reference to Discussion	Summary
			▪ Appendix K: The Agricultural Protection Plan ▪ Appendix L: The Framework Traffic and Transportation Management Plan ▪ Appendix M: Framework Blasting Plan ▪ Appendix N: Framework Erosion, Dust Control, and Air Quality Plan ▪ Appendix O: Framework Fire Prevention and Suppression Plan ▪ Appendix P: Framework Hazardous Materials Management Plan ▪ Appendix Q: Framework Construction Emergency Preparedness and Response Plan ▪ Appendix R: Operations, Maintenance, and Emergency Response Plan ▪ Appendix S: Cultural Resources Protection Plan ▪ Appendix T: Preconstruction Checklist ▪ Appendix U: Framework Flagging, Fencing, and Signage Plan ▪ Appendix V: PacifiCorp's Transmission Construction Standards ▪ Appendix W: PacifiCorp's Transmission and Distribution Vegetation Management Program Specification Manual and Idaho Power Company's Transmission Clearing Specifications and Framework for Managing Noxious Weeds ▪ Appendix X: Land Description of Project Components on Federally Managed Public Lands ▪ Appendix Y: Other Information ▪ Appendix Z: Environmental Protection Measures
Implementation Plans	2013 ROD	Appendix	▪ Appendix C: Draft Off-site Compensatory Mitigation to Offset Project Impacts to Greater Sage-grouse ▪ Appendix D: Draft Migratory Bird Habitat Mitigation Plan ▪ Appendix E: Programmatic Agreement ▪ Appendix G: Draft Framework for Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the United States

1.4 Guide to Resource Sections

The BLM and Proponents have identified three categories of resources within the SRBOP as follows:

- Cultural Resources and National Historic Trails,
- Recreation and Visitor Services, and
- Habitat.

Each of the following sections outlines and analyzes the specific details of the Framework for each of these three categories of resources within the SRBOP. Each resource section has the following subsections:

- Introduction
- Impact Assessment
- Mitigation – starts with a short description of avoidance, minimization, rectification/reduction or elimination over time and then describes potential compensatory mitigation projects for each of the three types of compensatory mitigation:
  - Preservation (Protection)
  - Restoration
  - Establishment (Science and Education)

2 CULTURAL RESOURCES AND NATIONAL HISTORIC TRAILS

2.1 Introduction

The Section 106 regulations (36 Code of Federal Regulations [CFR] 800) applicable to cultural resources impacts on this project fall under the National Historic Preservation Act (NHPA). Compliance with the Section 106 regulations for the NHPA is being handled through the Programmatic Agreement (PA) for the Project, which involved multi-year and multi-agency negotiations with numerous consulting parties, including Native American tribes. The PA was signed in 2012 and was attached to the Gateway West FEIS and ROD. The PA allows for a sampling inventory to model potential cultural resource impacts by alternative to allow comparative analysis.

The NHPA compliance process results in evaluating which cultural resources are determined eligible for the National Register of Historic Places (NRHP). Only those cultural resources determined eligible to the NRHP, referred to as “historic properties,” are assessed for impacts from a project or “undertaking.” The challenge is that, under NEPA, all of the cultural resources need to be considered rather than just those deemed “historic properties”. For example, some historic trails, traditional cultural use areas for tribes and cultural landscapes may fall outside of the official definition for “historic properties” As contained in the NHPA Section 106 regulations.

The NHPA requires an agency to evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate the effect to historic properties. However, the regulations only discuss mitigation in a general sense as a mechanism to reduce to historic properties. The regulations do not define mitigation or specify what constitutes mitigation.

A connected process of the PA is the creation of a Historic Properties Treatment Plan (HPTP), which will outline the mitigation plan for the Project, as well as provide for site-specific mitigation once all the cultural inventory has been completed, under the NHPA. The Presidential Memoranda on mitigation, DOI manual 600 DM 6 on landscape-scale mitigation and current BLM guidance on mitigation do not specifically address cultural resources. As a result, the purpose of this portion of the Framework is to outline how impacts to cultural resources will be assessed and what types of mitigation measures will be implemented to mitigate for those impacts, with the goal of achieving enhancement of cultural resources in the SRBOP.

For historic trails, the National Trails System Act (NTSA) is the legislation that governs the protection of Trails that are congressionally designated National Historic Trails (NHT). The NTSA stipulates that projects may not “….substantially interfere with the nature and purpose of the trail.” BLM Manual 6280 lays out the agency policy for compliance with the NTSA, management of the trails, as well as guidance for analysis of NHT in the NEPA process. While the FEIS and ROD for the Gateway West Project did not address Manual 6280, because they preceded the release of the Manual, the trails chapter of this SEIS does address the Manual.

The Manual stipulates that the NEPA documentation for NHTs needs to include analysis of the potential impacts to the nature and purpose of the designated NHT as well as

those undergoing a National Trail Feasibility Study. The analysis needs to take into account the trail resources, qualities, values, and associated settings and the primary use or uses of any NHTs. The Manual also discusses mitigation to impacts and requires consideration of mitigation opportunities "….to the level commensurate with the adverse impact to the nature and purposes; resources, qualities, values and associated settings; and the primary use or uses of the NHT." However, specific mitigation guidance or expected outcome is not delineated in the Manual.

Potential compensatory mitigation, including enhancement, for the cultural resource and national historic trails values identified in the enabling act for the SRBOP (P.L. 103-64) is the subject of this resource section.

2.2 Impact Assessment

Impacts to cultural resources and historic trails can be direct and indirect, as well as cumulative. Construction and operation and maintenance of the transmission line and its ancillary facilities and roads could directly impact existing cultural resources, such as prehistoric or historic archaeological sites, while indirect effects from a visual sense could affect historic architectural or built environments and cultural landscapes. Impacts are discussed separately for cultural resources and historic trails and are in Chapter 3 of the SEIS, Section 3.1 – National Historic Trails; and Appendix J, Section 3.3 – Cultural Resources. Impacts to cultural resources are referenced in Sections 3.3.2.3 and 3.3.2.4 and Table 3.3-7. For historic trails, impacts are referenced in Sections 3.1.2, 3.1.2.2, and 3.1.2.3, and Table 3.1-19.

In addition, after construction, public use of existing and new access roads may encourage unauthorized site access, illicit artifact collection, and resource vandalism. Transmission line structures may introduce visual impacts on existing cultural resources, especially historic trails, where setting is a key element of their NRHP eligibility. The presence of large transmission structures would also introduce long-term, cumulative visual impacts.

The analysis methods for determining the impacts, minimization, and mitigation to cultural resources and historic trails are subjective in nature, and thus more qualitative than quantitative, because these are finite, non-renewable resources. While it can be assumed that certain cultural resources may be more important than others, the only standard by which they are compared is the NRHP criteria of significance, identified in 36 CFR 60.4. Moreover, it can be assumed that different portions of the population, such as Native American tribal members, may not value cultural resources the same way, with some land users placing more significance on certain types of cultural resources than others. The process of evaluating cultural resources under the NHPA for their eligibility to the National Register may result in resources being determined eligible to the National Register and determined a "historic property." Those sites that are either on or eligible for the National Register are more significant than those that are not but there is still no comparison of these sites against one another. Those that are not eligible do not receive the same consideration under the NHPA. For other resources that are not evaluated under this process, or fall outside of an "historic property" definition, there is no accepted standard by which to judge their values.

However, in both cases, the important factor is the integrity of the site and whether the character-defining features that give significance to the site are intact.

In Manual 6280, NHTs are considered as a contiguous unit and may have portions that are no longer visible trail routes, as well as segments with intact trail ruts or other features. Under the NHPA, the trail segments need to possess the character-defining features that make them eligible to the National Register and thus are considered "historic properties," but under Manual 6280 they are still considered NHTs whether they retain such integrity or not. The Comprehensive Management and Use Plan (CMUP; NPS 1999) established High Potential Sites and Segments (HPSS) as the criteria for significant elements of the NHT to be protected and preserved. Consequently, the recommended guidance under the Manual for avoidance, minimization, and mitigation focuses on these HPSS. While generally the physical trails themselves can be avoided for direct impacts, the indirect impacts become more challenging to mitigate. The analysis in the SEIS relies on a viewshed model that takes into account the setting of the historic trail, the integrity of the visual context, and the proximity and prominence of the Project within the historic trail setting.

NEPA requires that all cultural resources are taken into consideration. Consequently, the best formula that can be utilized is a relative one of high, medium, and low impact on the resources and a relative classifying of cultural site types using site importance and integrity. The logical action is to consider those sites that are the most pristine, intact, and multifaceted and provide the most benefit to the resource, as well as the public value, for the most exhaustive mitigation. For example, a historic site that has intact structural elements and no visual intrusions or modifications to its historic and landscape setting would rank high in its cultural integrity and therefore be impacted more by the project than a site that already has introduced modifications. These factors will come into play in determining applicable avoidance, minimization, and mitigation and how, or if, compensation for impacts is necessary.

Determining impacts to cultural resources is subjective. However, through use of the HPTP for historic properties and the methodology described above for other cultural resources, impacts can be assessed by cultural resource professionals. Furthermore, through avoidance and minimization many of those impacts can be all together avoided or minimized to the maximum extent possible. Finally, compensatory mitigation can be used to account for remaining residual impacts to an extent that ultimately leads to achieving enhancement of cultural resources in the NCA.

2.3 Mitigation

As discussed elsewhere, the first steps in the mitigation hierarchy are avoidance and minimization. In general, most, if not all, of the direct impacts to cultural resources and historic trails will be avoided by locating towers and other ground-disturbing features at the maximum separation and maximizing span distance. Many of these are captured in the FEIS standard design features and EPM. Minimization actions will include topographic screening of sites from the Project, crossing historic trails perpendicular to the trail and in locations without trail traces or where the setting lacks integrity, and providing buffers around the cultural sites.

For cultural resources that cannot be avoided or minimized, mitigation plans outlined in the SEIS through both the HPTP and other mitigation plans will be generic and not include any site-specific compensatory mitigation. This is partially due to the fact that the final cultural resource inventories covering 100 percent of the selected alternative will not be completed until after the ROD pursuant to the executed PA, when the Proponents present the final engineering and design plan. The components of the overarching HPTP will discuss general mitigation measures that could be implemented project-wide and may include, among others, such ideas such as interpretive signs and kiosks, stabilization of historic buildings, and oral histories. The HPTP will also include such chapters as monitoring during and after construction and inadvertent discoveries. Again, this will apply to historic properties, not other cultural sites such as cultural landscapes and traditional cultural use areas. The consulting parties to the PA, as well as agencies and tribes, will be consulted in the development of the HPTP. A similar working group with cultural resource expertise will be consulted to review the CMP cultural resource mitigation projects addressing other cultural sites not covered in the HPTP.

Some mitigation discussions appear in the body of the SEIS which for trails are Sections 3.1.2.5 and 3.1.2.6 as well as Appendix J and for cultural resources Section 3.3.2.5. EPMs are outlined in Sections 3.3.2.6 and 3.3.2.7. The SRBOP RMP outlines desired future conditions for cultural resources that would protect cultural and historical resources and preserve past, present, and future traditions and practices. This would be accomplished through protection using physical and administrative measures, education, interpretation, and special designations. Protective measures would include restricting vehicles to designated routes in the Archeological Historic District and fencing to protect sites *in situ*. The Oregon Trail could be protected by establishing it as a Visual Resource Management (VRM) Class II area. Adverse impacts would be mitigated using a variety of options including documentation of sites, testing or data recovery, acquiring lands containing significant cultural resources, and enlarging the Oregon Trail Special Recreation Management Areas. The RMP also recommends monitoring the effectiveness of any programs implemented by having periodic site visits to assess conditions.

The CMP must include the following types of measures that would represent identifiable projects that enhance cultural resources and historic trails within the NCA:

- Preservation (Protection),
- Restoration, and
- Establishment (Science and Education).

2.3.1 Preservation (Protection)

Protection projects could include establishing protective barriers such as fences or berms, closing roads to motorized vehicles near sites or road segments that are historic trail routes, stabilizing physical elements of buildings or other structures, or hardening ground surfaces and establishing erosion controls. Acquisition of historic sites or historic trail segments off-site and on other land ownership is encouraged to protect these sites by incorporating them into public or collaborative public/private

management. To ensure ongoing protection of cultural resources, law enforcement patrols of site areas and periodic cultural resource monitoring would be implemented. Options for such monitoring could be to establish a site stewardship program through cultural resource volunteers, trails advocacy groups, or tribal programs.

While most mitigation is intended to be commensurate with the impact, in kind, and directly correlated to the site or in the vicinity of the resource, enhancements will be more expansive and elaborate. Enhancement projects for cultural resources would be viewed slightly differently than for other resources in that the concept of “baseline” or a threshold to be reached is difficult to apply. For the most part, enhancement would be projects that go beyond the standard of stabilizing sites or doing data recovery on an archeological site. Enhancement on a data recovery project involving an archaeological site could be developing a public outreach component to allow site tours during excavation, additional research and publication of a public version of the report, a school program, and media programming. More complex restoration projects would also qualify as enhancement, especially if they involve other disciplines. For example, a historic ranch complex could be acquired as protection and the enhancement portion could be to restore the complex to its historic setting by removing invasive plant species, replanting ranching period crops, orchards or other trees, and rehabilitating and restoring the house and outbuildings to the appropriate architectural period. In addition, further enhancement could be to develop the ranch complex into a recreational site and enhance visitor opportunities with interpretive informational features such as signs, periodic events/tours or even have a living history site open at least on a periodic basis.

As an example, an opportunity in the SRBOP for enhancement that would involve a collaborative effort, and multiple resources, would be Celebration Park. The county park features a well-known petroglyph boulder site, a historic railroad bridge, and a small interpretive museum.

2.3.2 Restoration

Restoration projects could include stabilizing and rehabilitating historical sites such as structures or features mostly of an architectural nature. One example would be restoration of historic structures. It could also include the restoration of the setting around such a site such as the landscape and surrounding vegetation. Restoration could entail removal of modern features and intrusions within the cultural context of the site. For example, an historic trail setting that is currently surrounded by invasive plants such as cheatgrass could be restored to native shrub-steppe vegetation. Restoration of natural areas that have significance to a particular ethnic group, such as tribal root-gathering grounds, could also be considered.

2.3.3 Establishment (Science and Education)

Establishment focuses mainly on research, interpretation, and public awareness and enjoyment of cultural sites. Examples of potential mitigation projects, especially for historic trails, include interpretive signs, kiosks, and visitor centers that would describe the site and provide background information to the public. Research, oral histories, and ethnographies would be other options to enhance knowledge of cultural resources. Additional actions that could promote these locations for public interest would be to

produce school programs and curriculum, establish parking areas at historic trail access points, and build turnstiles and gates in existing fences where trails could be accessed. Many of the latter efforts could dovetail with recreation and visitor services to augment recreation sites. An example of a project that would fall into this category would be the expansion of a recreation area near historic trail ruts to include a hiking area and interpretive panels for this section of the trail.

3 RECREATION AND VISITOR SERVICES

3.1 Introduction

While recreation may not have had been emphasized early in the history of BLM, FLPMA recognized recreation as an important component of multiple use management. Over the years, definitions of recreation have differed in their particular emphasis but have shared a common core: recreation is a behavior that individuals choose to engage in for the purpose of realizing experiences and personal benefits, such as renewal or refreshment. The individual attains experiences and benefits by participating in preferred recreation activities in preferred recreation settings.

Public lands can provide visitors a wide array of satisfying recreation experiences. The goal of the public land manager is to provide opportunities for visitors to obtain desired experiences and beneficial outcomes while protecting resources. The manager accomplishes this goal by planning for and managing the physical, social, and operational settings and the activities that occur within them.

In the last several decades, there has been a growing recognition of how much recreation contributes to the quality of life, economy, society, and environment. Changing public values and expectations of land management agencies to meet the demand for diverse recreation uses has created the need for changes in managing recreation and visitor services. These changes and resulting advances in recreation management knowledge and practices have been responsible for the evolution in BLM's outcomes-focused management approach. Outcomes-focused management is defined as an approach to recreation management that focuses on the positive outcomes gained from engaging in recreational experiences. The Presidential Memoranda on mitigation, DOI manual 600 DM 6 on landscape-scale mitigation and current BLM guidance on mitigation do not specifically address recreation and visitor services. As a result, the purpose of this portion of the Framework is to outline how impacts to recreation will be assessed and what types of compensatory mitigation measures will be implemented to mitigate for those impacts, with the goal of achieving enhancement of recreation and visitor services in the SRBOP.

BLM Manual 8320 (Recreation Planning) directs the BLM to designate administrative units known as Special Recreation Management Areas (SRMAs) where there is a need for a higher level of managerial presence or investment than is typical of most public land. The SRBOP RMP designated four SRMAs based on significant recreational, scenic, or cultural values: Snake River Canyon, Owyhee Front, Oregon Trail, and C.J. Strike.

Potential compensatory mitigation, including enhancement, for the recreation and visitor services values identified in the enabling act for the SRBOP (P.L. 103-64) is the subject of this resource section.

3.2 Impact Assessment

Impacts to recreation resources are direct and indirect, as well as cumulative (refer to Sections 3.17 and 3.24 in Chapter 3 and Section 4.4.19 in Chapter 4). Construction and operation and maintenance of the transmission line and its ancillary facilities and

roads could directly impact recreation resources and users by changing the existing or desired recreation setting, the recreation opportunities provided, and the user's subsequent experience, while indirect effects from construction may reduce visitation to the SRBOP. The presence of large transmission structures would also introduce long-term cumulative visual impacts. Impacts are discussed in Chapter 3 of the SEIS.

Assessing impacts to recreation can be subjective as different members of the public place different values on competing types of recreation. However, both quantitative and qualitative types of data are useful to understand social situations and interaction. Quantitative data about the numbers of recreationists that use the SRBOP can be collected from traffic counters, register boxes, and campground receipts. Qualitative data documents the experiences and benefits associated with a quality recreation opportunity. These data help in understanding the who, what, when, where, and why people recreate in specific areas (outcomes) and what influences these outcomes (setting characteristics). The experience and outcome data allow land managers to better plan for, offer, and measure what visitors consider quality recreation opportunities.

Collecting qualitative data requires a dialogue with existing and potential visitors, residents, partners, community leaders, and other stakeholders to determine:

- What activities are preferred?
- What experiences are realized when participating in these preferred activities?
- What individual, social, economic, and/or environmental benefits are attained on-site?
- What benefits stay with the individual off-site, and what benefits cumulatively lead to off-site beneficial outcomes to communities, economies, and the environment?
- What Recreation Setting Characteristics support the desired experiences and benefits?

Various techniques can be used to ask these questions and document responses.

3.3 Mitigation

Many avoidance and minimization measures are identified in the FEIS standard design features and EPMs. For impacts to recreation resources that cannot be avoided or minimized in the SRBOP, this Framework provides general concepts and examples of projects that the Proponents would include in the CMP to ensure compensatory mitigation to achieve enhancement of recreation resources within the SRPOB.

There are a variety of potential projects that would fit within the different types of compensatory mitigation identified for the SRBOP: Preservation (Protection), Restoration, and Establishment (Science and Education). The CMP would include potential projects such as those included below but these should not be interpreted as a comprehensive or all-inclusive list.

Completion of recreation compensatory mitigation projects as identified in the CMP must result in enhance experiences for the SRBOP visitor.

3.3.1 Preservation (Protection)

3.3.1.1 Travel Plan Implementation

Mitigation opportunities include aid in implementation of a travel planning. This could include activities such as signing, road maintenance, road closures, road rehabilitation, and additional law enforcement presence. Timely implementation of the travel plans would enhance the recreation experience and would benefit other resources in the SRBOP.

3.3.1.2 Park Ranger Program

A park ranger program could be developed in order to protect and enhance the existing recreational setting and visitor experience. Park rangers (non-law enforcement) would educate the public on the values, resources, and regulations associated with the SRBOP through in-person contact, presentations, monitoring activities, and conduct general recreation duties such as servicing recreation sites. The goal of this program would be enhanced appreciation and understanding of the SRBOP resulting in less vandalism and other illegal activities.

3.3.1.3 Law Enforcement

The Gateway West Project would allow greater access to public lands that are not easily accessible at this time due to the increase in maintained roads. This would increase use of the public lands along the route of the Project. Additional law enforcement would improve public safety.

3.3.2 Restoration

3.3.2.1 Dump Removal

Unfortunately, dumping is a frequent occurrence in the SRBOP. A program could be developed to remove dump sites within the SRBOP. This project would allow for more dump site clean-up and removal than is currently occurring within the SRBOP. Additional law enforcement presence would be required as part of the project to aid in identifying individuals participating in illegal dumping and discourage additional dumping locations throughout the SRBOP.

3.3.2.2 Sign Repair and Maintenance

A sign program could be developed to monitor the conditions of signs within the SRBOP and provide funding to repair or replace damaged signs. The presence of well-kept signs benefits the recreational experience within the SRBOP.

3.3.2.3 OHV Trail System Development

Establishing and managing of a free cross-country OHV area in close proximity to current OHV users of the SRBOP would restore OHV opportunities that may be impacted by the Gateway West Project and lessen the impact of illegal OHV use within the SRBOP.

3.3.2.4 Recreation Site Improvements and Development

Recreation facility improvements at existing sites plus the addition of new recreation sites would enhance the recreational experience in the SRBOP.

3.3.2.5 Relocation of Existing Powerlines

The relocation of existing powerlines outside of the SRBOP would help to mitigate impacts to the recreational setting.

3.3.3 Establishment (Science and Education)

3.3.3.1 Visitor Center

A visitor center could be established for the SRBOP to provide additional education and outreach opportunities about the values of the SRBOP.

3.3.3.2 Shooting Range

Establishing and managing a shooting range outside of the SRBOP would help to mitigate impacts to the recreational setting.

3.3.3.3 Shooting Education Program

A shooting education program could be enacted to discourage shooting of abandoned debris and the use of lead bullets in the SRBOP to mitigate impacts to the recreational setting. The goal of the education program would be a change in user behavior resulting in less abandoned shooting debris and use of lead shot.

3.3.3.4 SRBOP Outreach/Education Program

An expanded SRBOP outreach/education program could be developed. This could include increasing partner capacity to communicate information about SRBOP values, resources, and management. The program could develop technology such as mobile applications to provide on- and off-site information to visitors. For example, a mobile application could be developed to include, among other things, SRBOP history, SRBOP tour routes, bird identification information, and information on other locations within the SRBOP, such as Swan Falls Dam.

3.3.3.5 Raptor Housing Improvements

The SRBOP mew (a building to house raptors) could be improved in order to provide enhanced facilities for the existing raptors and provide the capacity to house additional animals, such as reptiles, for education purposes.

3.3.3.6 Local Museum Improvements

The local museum could be expanded to provide additional education and outreach opportunities about the history and other values of the SRBOP. This project would enhance the recreation experience in the SRBOP.

4 HABITAT

4.1 Introduction

In 1993, the SRBOP contained predominantly intact upland plant communities including desert scrub and sagebrush steppe communities (e.g., shrub structure unaltered by fire). In 2008, the SRBOP RMP ROD was issued (BLM 2008). Between 1993 and 2008, fires altered 230,000 acres of the NCA to the extent that shrub-dominated communities were replaced by early successional plant communities containing an inter-mix of native and non-native invasive species. Within the RMP, three Management Areas (MAs) and associated Desired Future Conditions (DFCs) were designated and prioritized. MAs depict locations where specific management actions including rehabilitation and fire suppression are prioritized based on ecological resiliency and function for highest fire management priority and restoration potential. Three MAs and corresponding DFCs for vegetation are designated and prioritized in the RMP.

- MA 1 is composed of sagebrush and salt desert shrub communities, and is identified in the RMP as the area within the SRBOP most resistant and resilient to disturbance with the highest probability of restoration success (BLM 2008).
- Areas designated as MA 2 still contain habitat structure (e.g., shrub communities) that provide some habitat connectivity value for supporting a raptor prey base, but to a lesser extent than what is found in MA 1.
- MA 3 is managed at a lower priority level than MA 1 or 2 due to almost complete loss of shrub structure and the associated lack of ecological resilience and resistance of the current plant communities.

The RMP for the SRBOP emphasizes the restoration and rehabilitation of all areas outside the Idaho Army National Guard Orchard Combat Training Area to bring raptor populations and habitat to more desirable conditions. The RMP identifies appropriate management actions to avoid or minimize environmental impacts where practicable, while meeting the purposes for which the SRBOP was established. The RMP states that mitigation may also be developed during site-specific activity and project-level analysis to meet management direction for the SRBOP. This direction includes:

- protecting remaining shrub communities,
- restoring shrub habitat, and
- completing fuels management projects.

Potential compensatory mitigation, including enhancement, for habitat values identified in the enabling act for the SRBOP (P.L. 103-64) is the subject of this resource section.

4.2 Impact Assessment

Impacts to raptors and their habitat are assessed in Sections 3.10, 3.11 and 3.14 of the FSEIS. A model compensatory mitigation accounting system has been developed to quantify impacts to raptor habitat in the SRBOP. Raptor habitat is assumed to be a suitable surrogate for quantifying adverse impacts (i.e., debits) and beneficial effects

(i.e., credits) to raptor populations. The BLM will use the methods in the conceptual model to calculate compensatory mitigation debits and credits for any authorization that impacts raptor habitat in the SRBOP.

Table 2 shows the various condition classes for vegetation communities found in the SRBOP. The DFC of MA 1 is a mosaic of multi-aged shrubs, forbs, and native and adapted non-native perennial grasses (i.e., Ecological Potential [EP]). Although this DFC is synonymous with the highest-valued raptor habitat, other condition classes provide suitable raptor habitat (i.e., grass-dominated native shrubland/grassland [NSG]) or adequate raptor habitat (i.e., multi-aged shrubland with an invasive grass understory [SX]) due to the community's increased ability to move to a higher condition class (via the restoration pathways shown in Figure E) or remaining vegetative structure.

Table 2. Vegetation Community Condition Classes and Relative Raptor Habitat Value

Condition Class	Canopy Cover of Primary Components (%)			Habitat Value
	Sagebrush	Invasive Annual Grass	Other	
Ecological Potential (EP)	≥ 15	< 50	native perennial grass > seeding	1.0
Early-seral Native Shrubland/Grassland (NSG)	< 15	< 50	native perennial grass > seeding	0.8
Shrublands/Invasive Annual Grasses (SX)	≥ 5	≥ 50	NA	0.6
Non-native Seeding (NNS)	< 15	< 50	seeding > native perennial grass	0.4
Invasive Annual Grassland/Forbs (X)	< 5	≥ 50	NA	0.2
Facility/Developed Sites	0	0	NA	0.0

Calculating Current Baseline

One method for establishing a baseline for SRBOP raptor habitat is to assign values to vegetation community condition classes based on the services and functions they provide as habitat for raptors and raptor prey. For this example, one of five condition classes (Table 2) is assigned to each acre within the analysis area. Each condition class carries a habitat value between 0 and 1. When considered cumulatively, a mean per-acre habitat value can be calculated for the area and impacts (i.e., debits) and offsets (i.e., credits) assessed for habitat loss and restoration treatments, respectively. The mean SRBOP habitat value for an analysis area is calculated by averaging the habitat values of each acre within the analysis area. The resulting mean habitat value would represent the current baseline before Project impacts.

Calculating Debits

The construction, operation and maintenance of the Gateway West Project would result in complete loss and degradation of SRBOP raptor habitats at locations where facilities are sited and construction areas surrounding these facilities, which generally would be cleared of vegetation during construction. Some of these construction areas would be restored over time to EP, while other areas immediately surrounding facilities would be periodically re-disturbed or maintained in a condition class with relatively lower habitat value (e.g., NSG or NNS). These areas may continue to experience ongoing

disturbance during operation but could also retain some raptor habitat component. A minor subset of the Project's overall disturbances would result in complete loss of habitat value; within the SRBOP this would mostly be limited to the footprint of individual facilities.

4.2.1 Conceptual Model Example: Mitigation Calculations for Impacts Resulting in Complete Loss of Habitat within Management Area 1

The following example uses the model method to calculate the debits and required credits (i.e., the mitigation requirements) related to impacts of a hypothetical project sited within MA 1 for acres with a complete loss of habitat (i.e., mitigation to compensate for the Project's permanent footprint). Similar but modified methods would be used for the other impacts (i.e., temporary, non-periodic and temporary, periodic impacts) in MA 1, as well as all impacts in MA 2 and MA 3.

Calculation of Existing Baseline Condition

First, assume that each cell in Figure A represents 1 acre of a Wyoming Big Sagebrush habitat of varying condition classes, each of which has a different potential restoration pathway (as shown in Figure E). The example area (Figure A) has a finite area of 30 acres (A1) that contains a variety of condition classes with different habitat values (A2). The mean value of the raptor habitat in this area is 0.57/acre (A3).

Figure A. Existing Baseline Condition

EP (1.0)	EP (1.0)	EP (1.0)	NSG (0.8)	SX (0.6)
EP (1.0)	EP (1.0)	EP (1.0)	SX (0.6)	X (0.2)
EP (1.0)	EP (1.0)	SX (0.6)	NNS (0.4)	X (0.2)
NSG (0.8)	NNS (0.4)	NSG (0.8)	X (0.2)	X (0.2)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	SX (0.6)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	NNS (0.4)

A1). 30-acre area of Wyoming Big Sagebrush Ecological Site
A2). EP: 8 x 1.0 = 8.0; NSG: 3 x 0.8 = 2.4; SX: 6 x 0.6 = 3.6; NNS: 3 x 0.4 = 1.2; X: 10 x 0.2 = 2.0
A3). Mean habitat condition value = (8.0+2.4+3.6+1.2+2.0) = 17.2/30 acres = ***0.57/acre***

Calculation of Debits for Permanent Project Impacts

Figure B displays the effects of the hypothetical project consisting of components that result in a complete loss of 5 acres of habitat (e.g., conversion of habitat to permanent facility footprint; red rectangles in Figure B). In this example, habitat loss within the area would last for the life of the project (i.e., a permanent impact; B1), and the BLM would permanently lose the ability to restore the impacted acres to their EP (as per RMP Objectives and Management Actions [BLM 2008]). The habitat values for each of the lost acres would be reduced to 0, and consequently, the resulting mean habitat value is reduced to 0.49/acre (B2 and B3).

Figure B. Debits for Permanent Project Impacts

EP (1.0)	EP (1.0)	EP (1.0)	NSG (0.8)	SX (0.6)
EP (1.0)	EP (1.0)	EP (1.0)	SX (0.6)	X (0.2)
EP (1.0)	EP (1.0)	SX (0.6)	NNS (0.4)	X (0.2)
NSG (0.0)	**NNS** (0.0)	**NSG** (0.0)	**X** (0.0)	**X** (0.0)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	SX (0.6)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	NNS (0.4)

B1). Permanent loss of 5 ac of EP potential (red rectangles)
B2). EP: 8 x 1.0 = 8.0; NSG: 1 x 0.8 = 0.8; SX: 6 x 0.6 = 3.6; NNS: 2 x 0.4 = 0.8; X: 8 x 0.2 = 1.6
B3). Mean habitat condition value = (8.0+0.8+3.6+0.8+1.6) = 14.8/30 acres = **0.49/acre**

Calculation of Credits for Habitat Restoration Treatments

To return the area to the mean habitat value that existed at baseline, habitat restoration treatments would be required (see Figure C). In the first step, 5 acres at other locations within the affected area (green rectangles in Figure C) would be treated to mitigate the lost habitat value and compensate for the lost opportunity to restore the developed acres to their EP (C1). Habitat values for each treated acre would increase to 1.0 (i.e., the EP; C2). As a result, mean habitat value would increase to 0.55/acre (C3); however, this would still be below the baseline of 0.57/acre.

Figure C. Credits for Initial Habitat Restoration Actions

EP (1.0)	EP (1.0)	EP (1.0)	**NSG→EP** (1.0)	**SX→EP** (1.0)
EP (1.0)	EP (1.0)	EP (1.0)	**SX→EP** (1.0)	X (0.2)
EP (1.0)	EP (1.0)	**SX→EP** (1.0)	NNS (0.4)	X (0.2)
NSG (0.0)	NNS (0.0)	NSG (0.0)	X (0.0)	X (0.0)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	**SX→EP** (1.0)
X (0.2)	X (0.2)	X (0.2)	SX (0.6)	NNS (0.4)

C1). Treat 5 ac to replace lost opportunity to restore 5 ac to EP potential at developed sites
C2). EP: 13 x 1.0 = 13.0; NSG: 0 x 0.8 = 0; SX: 2 x 0.6 = 1.2; NNS: 2 x 0.4 = 0.8; X: 8 x 0.2 = 1.6
C3). Mean habitat condition value = (13.0+0+1.2+0.8+1.6) = 16.6/30 acres = **0.55/acre**

Credits for Additional Habitat Restoration Actions

Because the mean habitat value following the initial step would remain below the baseline (i.e., 0.55/acre after mitigation treatments is less than 0.57/acre at baseline), additional acres would need to be treated (Figure D). One approach that could be used to equal or exceed baseline conditions (i.e., increase habitat values) would be treating additional acres to attain the DFC for raptor habitat (orange rectangles in Figure D; D1).

In practice, SX (Shrublands/Invasive Annual Grasses) is not a target DFC for habitat restoration treatments. However, SX does provide better structure, and therefore better raptor habitat, than NNS (Non-native Seeding). In turn, although NNS is more desirable for long-term soil stabilization and reduced fire risk than X (Invasive Annual Grassland/ Forbs), NNS is also not a DFC for SRBOP raptor habitat (i.e., the focus of habitat management objectives and actions in MA 1).

However, if the existing condition of SX acres not treated in the first step (C1) were replaced at additional treatment sites to condition classes that would provide DFC for raptor habitat (i.e., EP or NSG; D2), the resulting mean habitat values would increase to 0.64/acre (D3), which would exceed the baseline mean habitat value (A3).

Figure D. Credits for Additional Habitat Restoration Actions

EP (1.0)	EP (1.0)	EP (1.0)	NSG→EP (1.0)	SX→EP (1.0)
EP (1.0)	EP (1.0)	EP (1.0)	SX→EP (1.0)	**X→NSG** (0.8)
EP (1.0)	EP (1.0)	SX→EP (1.0)	**NNS→EP** (1.0)	X (0.2)
NSG (0.0)	NNS (0.0)	NSG (0.0)	X (0.0)	X (0.0)
X (0.2)	X (0.2)	X (0.2)	**SX→EP** (1.0)	SX→EP (1.0)
X (0.2)	X (0.2)	X (0.2)	**SX→EP** (1.0)	**NNS→EP** (1.0)

D1). Treat 5 acres to replace loss of 5 acres of Existing Condition (or DFC) at Treatment Sites
D2). EP: 17 x 1.0 = 17.0; NSG: 1 x 0.8 = 0.8; SX: 0 x 0.6 = 0; NNS: 0 x 0.4 = 0; X: 7 x 0.2 = 1.4
D3). Mean condition value = (17.0+0.8+0+0+1.4) = 19.2/30 acres = **0.64/acre**

Any number of alternative scenarios to achieve mean baseline conditions could be substituted for or added to the additional credit step in Figure D, on the condition that treated acres end up in a DFC for SRBOP raptor habitat. Figure E shows various potential pathways for restoration to DFC.

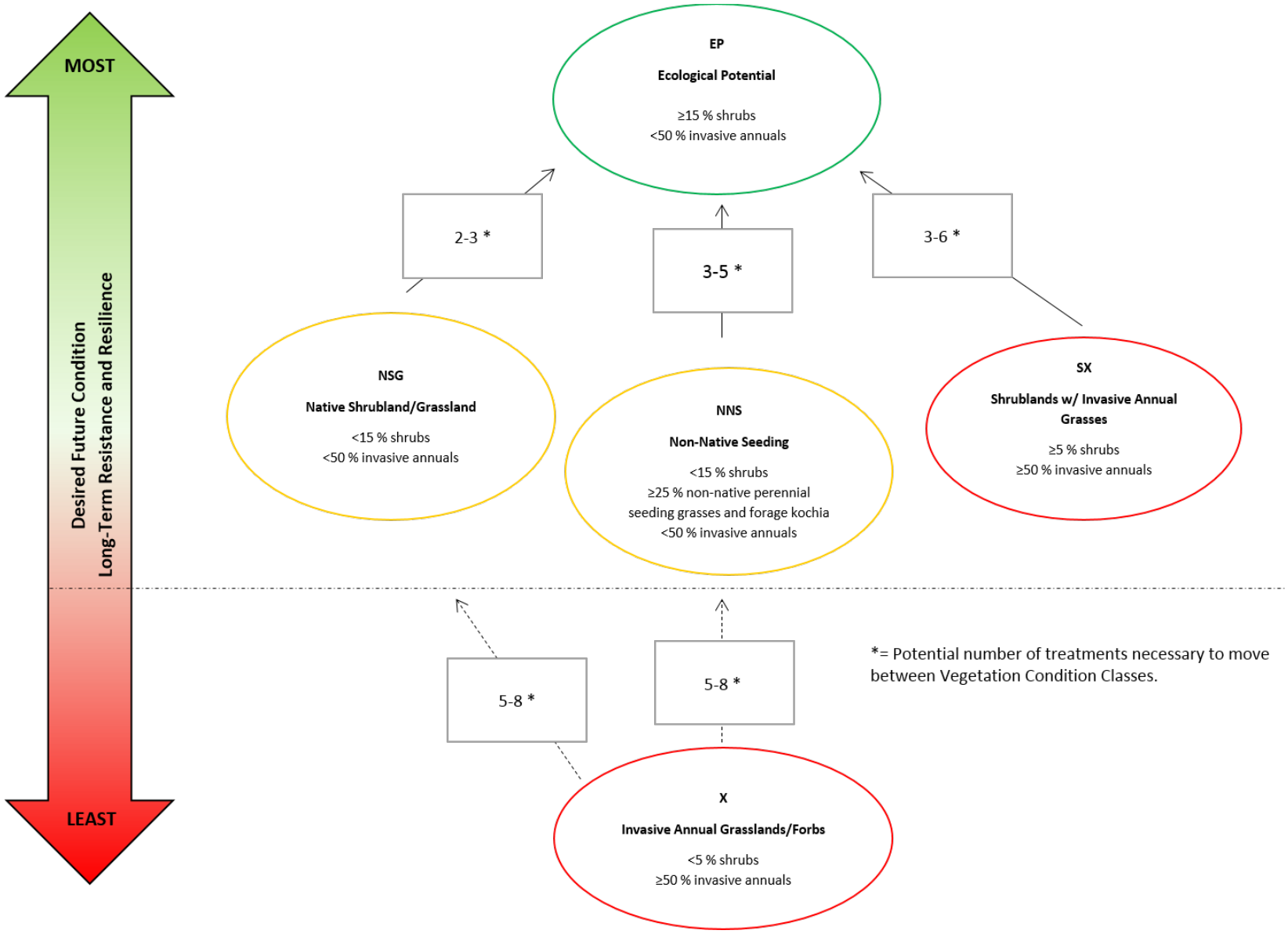

Figure E. Raptor Habitat Condition Classes: Pathways and Estimated Number of Required Restoration Treatments

4.2.2 Conceptual Model Example Summary

This model establishes a logical and transparent approach to assessing baseline conditions as they apply to raptor habitat within the finite area of the SRBOP and provides a simple method for calculating the mitigation required to achieve a return to or exceedance of baseline raptor habitat conditions in the SRBOP, using flexible habitat restoration treatments.

The most important and primary point of the example presented is that returning to baseline conditions requires a habitat restoration ratio greater than 1:1.

General guidelines for habitat restoration treatments that return to or exceed mean baseline conditions include:

- Habitat restoration treatment sites should be prioritized by ability to achieve EP or DFC for raptor habitat.
- Loss of the possibility to achieve EP at permanent impact sites (i.e., Project footprint) should be compensated by uplifting vegetation conditions to EP at additional habitat restoration treatment sites.
- Loss of existing condition at habitat restoration treatment sites could be compensated by uplifting vegetation conditions to DFC for SRBOP raptor habitat (i.e., EP or NSG) at additional habitat restoration treatment sites.

4.3 Mitigation

The SRBOP RMP has the following vegetation mitigation goals:

- Develop ecosystem connectivity and spatially and temporally robust habitat structure and function.
- Build resistant and resilient landscapes that maintain and increase meta-stability for plant and wildlife communities.
- Reduce fire size and frequency to maintain desired plant community structure and function.

Many avoidance and minimization measures are identified in the FEIS standard design features and EPMs. For vegetation resources that cannot be avoided or minimized in the SRBOP, this Framework provides general concepts and potential projects that will be identified in the CMP to ensure compensatory mitigation to achieve enhancement of raptor populations and habitats within the SRBOP.

The overall credits from compensatory mitigation would exceed the overall debits of the Project to result in enhancement (i.e., net benefit) to SRBOP raptor populations and habitats. Enhancement is defined as an improvement over current baseline conditions.

Habitat restoration treatments would be the primary compensatory mitigation the BLM will require to address impacts from the construction of Gateway West Project to SRBOP raptor populations and habitats.

Habitat restoration may also include treatments for traditional use vegetation for tribal purposes.

Siting Compensatory Mitigation

Habitat restoration treatments would primarily be conducted within MA 1 because the RMP identifies this area as having the highest probability of restoration success (BLM 2008). The model assumes that the EP of an area is specific to the Ecological Site Descriptions (ESDs) of the vegetation community.

In addition, habitat restoration treatments would be located within fuel break compartments that contain a gradient of the raptor habitat condition classes described in Table 2. Fuel breaks will compartmentalize habitat restoration areas to provide durability for treatments.

Restoration treatment areas within MA 1 will be defined and prioritized based on:

1. where treatments would provide the best connectivity between existing shrub communities,
2. where perennial native and non-native vegetation (seedings) exist and provide stable ecological conditions that facilitate restoration success,
3. where existing ongoing restoration and research demonstration projects can continue to be leveraged, and
4. where sites have the ability to achieve EP or NSG (i.e., DFCs for SRBOP raptor habitat).

It should be noted that, depending on initial condition class, it may take multiple treatments to achieve a DFC for raptor habitat (Figure E). In addition, the entire SRBOP is a finite area, and areas identified for restoration treatments will be further bounded to ensure a relationship between Project impacts and mitigation measures. All compensatory mitigation measures should be durable for the duration of the Project impacts, and thus provide benefit to SRBOP raptor populations and habitats for that duration.

Additional Considerations for Compensatory Mitigation

The risk of failure of habitat restoration treatments will be accounted for in two ways:

1. The party responsible for the habitat restoration treatments (i.e., the Proponents) will be required to achieve the outcome (i.e., a specific habitat condition class), as opposed to specific amount of output.
2. The BLM will adjust the acreage of required habitat restoration treatments to account for the potential failure to achieve improved raptor habitat outcomes.

All compensatory mitigation measures that may be included in the CMP will be managed adaptively to achieve their required outcomes, based on required monitoring and reporting.

Finally, any time lag between the onset of impacts from the Project and the achievement of compensatory mitigation outcomes will also be accounted for by adjusting the acreage of habitat restoration treatments.

There are a variety of potential projects that would fit within the different types of compensatory mitigation that may be included in the CMP: Preservation (Protection), Restoration, and Establishment (Science and Education). Examples of possible projects are included below but this is not a comprehensive or all-inclusive list.

4.3.1 Preservation (Protection)

4.3.1.1 Wildfire Fuel Breaks

One method of habitat preservation is the use of wildfire fuel breaks to increase the durability of habitat restoration treatments. For example, a network of fuel breaks could be used to compartmentalize the landscape and assist fire suppression resources to minimize large fire growth and protect habitat restoration treatments.

Fuel breaks enhance fire suppression efforts by (1) providing tactical and logistical opportunities to fire personnel, including easy and efficient access to fire prone areas, (2) compartmentalizing areas between fuel breaks to contain wildfires into more manageable units, and (3) minimizing fire spread after ignition. Fuel breaks, if implemented and maintained, provide fire suppression personnel with an opportunity to safely engage wildfires and to more effectively attack wildfires across a larger area with fewer resources. A system of fuel breaks created by a combination of mechanical and chemical treatments would protect habitat mitigation measures and human life and property by reducing the spread of future fires, including human-caused fires ignited near energy corridors, roadways and agricultural lands.

4.3.1.2 Fuel Break Components

The National Wildfire Coordination Group (NWCG) defines a fuel break as “a natural or manmade change in fuel characteristics which affects fire behavior so that fires burning into them can be more readily controlled” (NWCG 2012). In order to provide durability to habitat mitigation from wildfire, fuel breaks should be designed to reduce flame lengths, slow the spread of fast-moving wildfire, and provide opportunities for firefighters to more safely and effectively gain control of or contain a fire. There are three primary components to a fuel break:

1. *Non-vegetated Roadbed:* All fuel breaks would have a roadbed (including shoulder and barrow ditch) free of vegetation. A roadbed free of vegetation is the non-burnable area that acts as the true break in fuel continuity.
2. *Accessibility:* The road associated with the fuel break should be maintained and accessible to fire equipment such as dozers, fire engines, and command vehicles. The logistics of fighting fire is aided by a road network that allows for the flow of resources and supplies to the fire within a reasonable timeframe to contain the fire. An accessible roadway also improves safety to fire resources by providing quick ingress and egress in case of emergencies associated with changing fire conditions.
3. *Fuel Treatment Zone:* Vegetative fuels along both sides of the roadbed should be reduced or modified in order to change the fire behavior as the fire burns into the fuel break. Reducing fuel and its continuity will reduce flame length, rate of spread, fireline intensity, and spotting distance of an encroaching wildfire which increases the effectiveness of wildfire suppression resources.

4.3.1.3 Application of Fuel Break Components

Accessibility and Roadbed Maintenance

Road improvement and maintenance would include using heavy equipment to blade or grade existing roadways to remove vegetation and improve access. Grading of road surfaces would allow for maintenance and improvement and creation of ditches and shoulders. Maintenance of roads may also include installing culverts, constructing rolling dip gravel stream crossings, road resurfacing, installing cattle guards, installing sediment barriers, and surfacing areas with gravel. Application of pre-emergent herbicides or soil sterilants after grading will reduce the spread and establishment of vegetation within the roadbed. All roadways identified as a fuel break would need periodic maintenance to ensure access for suppression equipment and a roadbed free of vegetation.

Fuel Treatment Zone

A 200-foot-wide reduction or modification of vegetation along both sides of the roadbed allows fire suppression resources to address a fire coming any direction. The 200 feet of treatment on both sides of the roadbed significantly increases the area and time the advancing fire's behavior is being reduced or modified, increasing time and space for the firefighters to respond to and anticipate the constantly changing fire environment. Treatment along both sides of the roadbed may be accomplished through various methods.

4.3.1.4 Fuel Break Criteria

Fuel breaks would meet the following criteria to be effective and provide a benefit to fire suppression resources:

- Strategic – located in high fire-prone areas where they are readily accessible providing firefighters a tactical and safe area to establish anchor points for suppression actions
- Landscape level – utilizes road network to compartmentalize wildfires across the landscape at a scale commensurate with the wildfire issue
- Timely – established and functional when needed during fire season (May-October)
- Feasible – implementation and maintenance costs should not limit ability to create effective treatments

Suggested Actions

- Spatially identify a network of fuel breaks along existing roads within, and adjacent to, the SRBOP that would:
  - Prioritize areas within the NCA to help guide the timing and location of a strategically phased implementation plan.
  - Reduce the amount of human caused fire originating along transportation corridors that threaten adjacent wildlands;
  - Provide fire personnel with a safe working environment to conduct fire suppression activities;

  - Contain wildfires at a smaller size, thereby reducing the time and exposure of fire suppression resources and the public to the hazards of wildland fires; and
  - Protect developing and existing wildlife habitat and vegetation restoration investments.
- Identify areas within the NCA where the following fuel break treatment type is most appropriate and will provide durability to habitat mitigation measures:
  - Disking/Blading Barren Strips,
  - Chemical,
  - Vegetative – native or non-native, and
  - Mowing.
- Identify appropriate fuel break width based on fuel break type and potential constraints across the landscape.
- Develop a range of implementation costs over a 30-year period using the cost estimate table for each fuel-break treatment type.

4.3.2 Restoration

A variety of vegetative restoration methods can be utilized as part of the Framework to restore prey habitat in the SRBOP.

4.3.2.1 Herbicide – Biological and Chemical

Use of BLM-approved herbicides (BLM 2014) within the context of Integrated Pest Management are considered an effective restoration tool. Herbicide use includes; selective control to target a specific invasive/noxious weed species using both pre and post emergent herbicides, or biocontrol agent(s), targeted release of more desirable species, site/seedbed preparation prior to seeding or planting and selective post treatment weed control.

4.3.2.2 Seeding – Drill and Broadcast

Where altered and ecologically depauperate conditions exist, successful seeding can accelerate community composition and reduce plant soil gaps, which lowers weed invasion risk. Some primary factors that influence species establishment include seed germination attributes, initial establishment traits, growth rates, species compatibility, seedling tolerances, persistence, and grazing impacts.

Different seeding techniques are necessary for different types of terrain (Monsen et al. 2004, Chapter 4). Techniques that apply seed directly from equipment onto the ground, such as rangeland drills, spreader seeders, cultipackers and imprinters, are generally the best choice for seeding wherever terrain permits. Sites that are too steep, rocky, or debris-covered for these techniques can be aerially seeded, although establishment from aerial seedings may be low on low-moisture sites. Mechanical soil disturbance should be kept to a minimum on sites with residual biological soil crusts and native perennials capable of resprouting after fire. Minimum-till drills offer lower-impact alternatives to conventional rangeland drills (Monsen et al. 2004, Chapter 4).

4.3.2.3 Planting

Reestablishment of big sagebrush and associated native shrubs following wildfire or other disturbance is critical to facilitate vegetation recovery and to provide community structure and services. Poor establishment of shrubs from seed can result from several factors, including adverse environmental conditions, herbaceous competition, the use of maladapted seed, and inappropriate seeding strategies (Monsen et al. 2004). The use of planting stock can circumvent some of these problems (Shaw 2004). Use of container, bareroot, or wildings can be used to augment seedings and increase more rapid development of shrub cover than seeding alone.

Planting tools include the use of hand tools (Macleod, Polaski, shovel, planting bar) or mechanical plug/transplanters pulled by a tractor.

4.3.2.4 Microsite Alteration

The use and installation of remote irrigation systems, as well as on-site structures/features such as straw wattles, rocks, and vertical mulching (Bainbridge 2007) can ameliorate the desiccating effects of wind and heat exposure for new seedlings. Application of these features can substantially increase plant survivorship and promote active seedling recruitment and persistence.

Tools could include the use of water tenders that are retrofitted with hoses and impact sprayers, and installation of remote, but portable water tanks with solar pumps and gravity or pump driven drip lines. The installation of hardscape (rocks) or softscape (mulch/vertical mulch) could also buffer more harsh environmental conditions especially if combined with natural topographical features like swales and northern exposures that already exhibit higher resilience features.

4.3.2.5 Exclosure Construction

Use, maintenance, and development of exclosures can provide increased assurances that restoration treatments will be successful because land uses that affect new seedings such as livestock grazing are removed. Currently, there are 25 exclosures in the NCA that can be leveraged for restoration activities both inside and outside MAs 1 and 2. An assessment of the status of these has been completed. Expansion or combining exclosures to increase size and management efficiency would provide added benefit by limiting the number of exclosures in the NCA and increasing the size, which would equate to increasing the patch size of restoration treatments.

4.3.2.6 Retreatment of Restoration Sites

Retreatment of restoration sites will be based on specific restoration monitoring objectives and adaptive management short and long term triggers. Retreatments can be minimized and restoration durability increased if treatments incorporate the following principles (Monson 2004):

- The proposed changes to the plant community would be necessary and ecologically attainable.
- The terrain and site would support the desired changes.

- Precipitation would be adequate to assure establishment and survival of indigenous and planted species.
- Competition would be controlled to ensure that planted species can establish and persist.
- Plant and manage site adapted species, subspecies, and varieties.
- A multispecies species seed mixture should be planted.
- Sufficient seed of acceptable purity and viability should be planted.
- Seed would be planted on a well-prepared seedbed.
- Plant during the season that provides the most favorable conditions for establishment.
- Newly seeded areas would be managed properly.

4.3.3 Establishment (Science and Education)

An environmental education program could be developed to increase public awareness of the importance of prey habitat to the raptors nesting in the Snake River Canyon. One aspect of the program could include the role of native vegetation in providing food and shelter for prey species. Another aspect of the program could educate the public on wildfire prevention.

5 GLOSSARY

Adaptive management: a system of management practices based on clearly identified outcomes and monitoring to determine whether management actions are meeting required outcomes; and, if not, facilitating management changes that will best ensure that outcomes are met or re-evaluated. Adaptive management recognizes that knowledge about natural resource systems is sometimes uncertain.

Additionality: a compensatory mitigation measure that improves upon the baseline conditions of the impacted resource, and is demonstrably new and would not have occurred without the compensatory mitigation measure.

Appropriate: necessary for and effective at achieving the outcome.

Authorized land user: an external entity that has an approved land use authorization.

Authorized land user-responsible compensatory mitigation measures: actions to restore, establish, enhance, and/or preserve resources (i.e., accrual of credits) by an authorized land user for the purpose of compensating for residual effects to resources from their authorized land use activities (i.e., accrual of debits); also referred to as permittee-responsible compensatory mitigation.

Avoidance: avoiding the impact altogether by not taking a certain action or parts of an action (40 CFR 1508.20(a)).

Baseline: the pre-existing condition of a resource, at all relevant scales, which can be quantified by an appropriate metric(s). During environmental reviews, the baseline is considered the affected environment that exists absent the project's implementation, and is used to compare predictions of the effects of the proposed action or a reasonable range of alternatives.

Best management practices (BMPs): state-of-the-art, efficient, appropriate, and practicable mitigation measures for avoiding, minimizing, rectifying, and reducing or eliminating impacts over time.

Change agents: an environmental phenomena or human activity that can alter or influence the future condition and/or trend of a resource. Some change agents (e.g., roads) are the result of direct human actions or influence; others (e.g., climate change, wildland fire, and invasive species) may involve natural phenomena or be partially or indirectly related to human activities.

Commensurate: a compensatory mitigation obligation that is reasonably related and proportional to the reasonably foreseeable residual effects from a land use activity that warrants compensation.

Compensation: compensating for the impact by replacing or providing substitute resources or environments (40 CFR 1508.20(e)).

Compensatory mitigation measure: an action that results in the restoration, establishment, enhancement, and/or preservation of resources in order to offset a residual effect from a land use activity.

Compensatory mitigation site: the areas where compensatory mitigation measures are located.

Credit: a unit of measure representing the restoration, establishment, enhancement, and/or preservation of resources by a compensatory mitigation measure.

Decision document: a formal agency decision, such as a Decision Record or Record of Decision associated with a NEPA document, or other program-specific decision documentation.

Durability: the maintenance of the effectiveness of a mitigation measure and/or a compensatory mitigation site for the duration of the impacts from the associated land use activity, including resource, administrative, and financial considerations.

Duration of the impact: the time that resource impacts (including direct and indirect effects) from a land use activity persist, even if this time period extends beyond the expiration of the land use activity. The duration of some impacts may be perpetuity.

Effects: the adverse direct, indirect, and cumulative impacts from a land use activity; effects and impacts as used in this policy are synonymous. Mitigation addresses the adverse direct and indirect impacts to the baseline conditions of resources (including consideration of the quality and quantity of those resources) from land use activities. The assessment of cumulative impacts provides a broader context for understanding the direct and indirect impacts.

Enhancement: the manipulation of resources to heighten, intensify, or improve a specific resource.

Establishment: the manipulation of resources to create a resource that did not previously exist at that site.

Formal and binding agreement: a legal document signed by an authorized officer of the BLM and any other applicable parties that outlines the terms and conditions of an arrangement between parties.

Impacts: the adverse direct, indirect, and cumulative effects from a land use activity; effects and impacts as used in this policy are synonymous. Mitigation addresses the adverse direct and indirect impacts to the baseline conditions of resources (including consideration of the quality and quantity of those resources) from land use activities. The assessment of cumulative impacts provides a broader context for understanding the direct and indirect impacts.

Important: resources that have a high level of significance for land management.

In-kind compensatory mitigation: the replacement or substitution of resources that are of the same type and kind as those impacted.

Land use activities: the occupancy, use, development, or traversing of BLM-managed surface or mineral estate; may be BLM-proposed or externally-proposed.

Landscape: a geographic area encompassing an interacting mosaic of ecosystems and human systems that is characterized by a set of common management concerns. The landscape is not defined by the size of the area, but rather by the interacting elements that are relevant and meaningful in a management context. The term “landscape” may

include water-centric scales, such as watersheds, if they represent the appropriate landscape-scale.

Minimization: minimizing impacts by limiting the degree or magnitude of the action and its implementation (40 CFR 1508.20(b)).

Mitigation: includes, avoiding the impact altogether by not taking a certain action or parts of an action; minimizing impacts by limiting the degree or magnitude of the action and its implementation; rectifying the impact by repairing, rehabilitating, or restoring the affected environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and, compensating for the impact by replacing or providing substitute resources or environments (40 CFR 1508.20).

Mitigation hierarchy: the process and order for identifying, analyzing, and requiring mitigation, generally, by first avoiding impacts, then minimizing, rectifying, and reducing or eliminating impacts over time, and then compensating for some or all of the remaining impacts (i.e., residual effects).

Mitigation obligation: the types of and amount of mitigation required by the BLM to mitigate reasonably foreseeable impacts to resources from a land use activity.

Mitigation standard: a description of the extent to which mitigation will be applied in order to support achieving resource objectives (e.g., net gain, no net loss). Mitigation standards can be identified in land use plans and other types of NEPA analyses and decision documents.

Multiple use: the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. (FLPMA § (103) (c), 43 USC 1702(c)).

NEPA process/analysis: analysis prepared pursuant to the National Environmental Policy Act, such as a planning- or project-level environmental assessment (EA) or environmental impact statement (EIS).

Net gain: when mitigation results in an improvement above baseline conditions.

Net loss: when the lack of mitigation results in a negative change to baseline conditions.

No net loss: when mitigation results in no negative change to baseline conditions (e.g. fully offset or balanced).

Objective: a description of a desired outcome for a resource.

Out-of-kind compensatory mitigation: replacement or substitution of resources that are of different type and kind as those impacted.

Outcome: a clearly-defined and measurable result that reflects the desired condition of a resource.

Output: the type and/or amount of actions or work to benefit a resource.

Performance standard: observable or measurable metrics that are used to determine if outcomes are met, and often include defined timeframes.

Practicable: available and capable of being done after taking into consideration existing technology, logistics, and cost in light of a mitigation measure's beneficial value and a land use activity's overall purpose, scope, and scale.

Preservation: the removal of a threat to, or preventing the decline of, resources. Preservation may include the application of new protective designations on previously unprotected land or the relinquishment or restraint of a lawful use that adversely impacts resources.

Public lands: any land and interest in land owned by the United States within the several States and administered by the Secretary of the Interior through the Bureau of Land Management, without regard to how the United States acquired ownership, except (1) lands located on the Outer Continental Shelf; and (2) lands held for the benefit of Indians, Aleuts, and Eskimos. (FLPMA § (103) (e), 43 USC 1702(e)).

Rectification: rectifying the impact by repairing, rehabilitating, or restoring the affected environment (40 CFR 1508.20(c)).

Reduction or elimination over time: reducing or eliminating the impact over time by preservation and maintenance operations during the life of the land use activity (modified from 40 CFR 1508.20(d)).

Residual effects: any adverse reasonably foreseeable effects that are expected to remain after application of the first four steps in the mitigation hierarchy; also referred to as unavoidable impacts. The implementation of mitigation measures (e.g., rectification) at some point in the distant future does not eliminate any residual effects that will exist until that mitigation measure's outcome is achieved.

Resources: see Resources (and their values, services, and/or functions).

Resources (and their values, services, and/or functions): <u>resources</u> are natural, social, or cultural objects or qualities; <u>resource values</u> are the importance, worth, or usefulness of resources; <u>resource services</u> are the benefits people derive from resources; and, <u>resource functions</u> are the physical, chemical, and/or biological processes that involve resources. (For the purposes of this policy, resources exclude non-renewable resources used for the production of energy (e.g. oil, gas, coal and other mineral resources). For brevity, in this policy, also referred to as "resources."

Responsible party: the entity accountable for fulfilling all aspects of mitigation obligations, including, but not limited to, ensuring the durability and effectiveness of mitigation measures, achieving mitigation measures' outcomes, and complying with

monitoring, adaptive management, and reporting requirements. The responsible party may be the authorized land user, the BLM, a third party, or a combination.

Restoration: the process of assisting the recovery of a resource (including its values, services, and/or functions) that has been degraded, damaged, or destroyed to the condition that would have existed if the resource had not been degraded, damaged, or destroyed.

Reversal: the loss of durability or effectiveness of a mitigation measure and/or a compensatory mitigation site.

Timeliness: the lack of a time lag between the impact to the resources and the achievement of the outcomes of the associated mitigation measures.

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Appendix L

Responses to Comments on the Draft SEIS

INTRODUCTION

This appendix contains the response to comments BLM received on the Draft SEIS for the Gateway West Transmission Line Project. The Draft SEIS was made available for public review on March 11, 2016. The 90-day public comment period closed on June 9, 2016.

Draft SEIS Announcements

The availability of the Draft SEIS and the public comment period was announced using a variety of tools:

- **Federal Register** – The BLM published a Notice of Availability in the Federal Register on March 11, 2016. The Notice of Availability announced the release of the BLM's Draft SEIS on the proposed Gateway West Transmission Line Project. The Notice of Availability also announced the BLM's intent to conduct public meetings and collect public comments on the document.
- **Notification mailer and e-mail** – The BLM prepared and distributed a newsletter notification, which was mailed and e-mailed to interested parties in the proposed and alternative Project corridors and to others interested in the proposed Project. Approximately 4,670 mailers and 2,800 emails were sent to a combination of BLM, Forest Service, and Project Proponent mailing list contacts.
- **Press releases** – The BLM prepared and distributed two press releases regarding the Draft SEIS comment period, public open house meetings, and to encourage public participation. The first press release was distributed on March 11, 2016, to announce the release of the Draft SEIS, the start of the 90-day comment period, and the public open house schedule. A second press release was distributed on March 30, 2016, to announce the addition of a fifth public meeting in Hagerman, Idaho.
- **BLM Gateway West Project Website** – The BLM Project website was updated to announce the release of the Draft SEIS. The updates included the public meeting and comment period schedule, details about where to find information related to particular resources in the document, and a link to an updated version of the Project interactive map. An electronic version of the document was made available to the public for viewing and download.
- **BLM Gateway West Online open house** – An online open house website was available online from April 4, 2016 through June 9, 2016. It included all displays, materials, and information provided at in-person open houses, including the Project interactive map. Public comments were accepted electronically through the online open house. The online open house received more than 190 visits from 125 users. 13 comments were submitted through the online open house.

Draft SEIS Meetings

The BLM hosted five public meetings in April 2016 to provide information on the document and encourage public comments on the Draft SEIS. As summarized in Table L-1, a total of 284 members of the public attended the various public meetings.

Table L-1. Draft SEIS Public Meeting Dates, Locations, and Attendance

Meeting Date	Meeting Location	Attendance
April 18, 2016	Hagerman, Idaho	39
April 19, 2016	Boise, Idaho	21
April 19, 2016	Kuna, Idaho	40
April 20, 2016	Twin Falls, Idaho	23
April 21, 2016	Murphy, Idaho	161
Total		**284**

There were 147 individual letters submitted to the BLM during the comment period and included in those letters were 711 individual comments. These letters and comments were reviewed by a team of analysts and logged into a database that was used to track and sort comments for response in the Final SEIS. Comments received during the Draft SEIS comment period are addressed and responded to in Appendix L of the Final SEIS.

COMMENT ANALYSIS

A team of analysts reviewed the documents and identified comments. All of the analysts have conducted comment analysis before and had contributed to the writing of the Draft EIS.

Comments were categorized by their subject matter and entered into a database. The analysts identified approximately 711 individual comments. These comments may have been included in multiple categories.

Note that the program used to capture the comments for presentation in this appendix may have resulted in inadvertently creating typographical errors that were not in the comment letter or losing footnotes attached to the comment; however, the comment letter was reviewed in its entirety prior to responding.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101475	(i)	B KER	I AM SICK TO DEATH OF PROFITEERS IN OIL, ELECTRIC, FRACKING, GAS, WHATEVER GETTING THE RIGHTS TO DRILL THROUGH OVER AND OVER AND OVER AGAIN ON ANY LAND WE HAVE SET ASIDE FOR OPEN SPACE AND WHICH SHOULD BE LEFT UNTOUCHED BY ALL THESE PROFITEERS. THAT LAND IS NOT OWNED BY THESE PROFITEERS. ITS TIME THAT WE TELL THESE PROFITEERS TO MAKE DEALS WITH PRIVATE LANDOWNERS TO PRIVATE OWNERS OF LAND AND TO PAY THEM MONEY FOR RIPPIGN UP THE LAND. WE ARE SICK AND TIRED OF OUR NATIONAL LAND BEING RIPPED UP, ANIMALS KILLED, THEIR HOMES TAKEN AWAY, BIRDS KILLED, TREES DESTROYED. WE ARE SICK OF THIS. THE TAXPAYERS NEVER GET A CENT OUT OF THIS USE. WE JUST GET USED AND RIPPED OFF. ITS TIME TO SET A NEW STANDARD. OUR NATIONAL LANDS DO NOT EXIST TO BE RIPPPED UP BY PROFITEERS FOR THE PROFITEERS PROFITS. THEY ARE GETTING AWAY WITH MURDER. IT IS COMPLETELY OBJECTIONABLE	Your opposition to commercial use of public land is noted.
101475	(ii)	B KER	PUT ME ON THE MAILING LIST	Your name has been added to the mailing list for this project.
101478	(i)	RICKEY AND LINDA POLLARD	This is to advise you that I am the owner of the following parcels: RP04501W235450 and RP04501W245450 and that I am in favor of the AGENCY PREFERRED ALTERNATIVE ROUTE THROUGH SECTIONS 8 AND 9.	Your support for the BLM's preferred routes is noted.
101488	(i)	KRIS KALANGES	I received the latest newsletter on the Gateway West project. It appears that the agency preferred route which would skirt just south of Kuna has been abandoned. Is that correct? That route, to my way of thinking, was the best choice in that it avoided both the Birds of Prey area as well as the Orchard Combat Training Center. If that route has not been abandoned I would like to voice my support for its choice.	The route south of Kuna is part of the analysis in the FEIS; however, it is not included in either of the BLM's co-preferred alternatives in the DSEIS.
101492	(i)	WILDLANDS DEFENSE,KATIE FITE, WILDLANDS DEFENSE	Here are copies of the April 2016 PEER Complaints to CEQ and the Interior Department, concerning BLM blindly ignoring the inter-connected effects of livestock grazing and climate change. These documents are to accompany the comments on Boardman to Hemingway and Gateway West Transmission Lines that WildLands Defense submitted to you yesterday. There are serious unaddressed and unmitigated cumulative effects of livestock grazing across the affected landscape, and seriously affecting the sensitive species habitats and populations, watersheds, ecological processes, and other very important values of the public lands. These range from grazing disturbance's and land impairment increasing weeds, increasing herbicide use, increasing desertification and causing loss of site resiliency (= local micro-site climate change of a sort), and loss of biodiversity. Grazing and grazing-caused land degradation feed into climate change, promoting site heating and drying, too. Many of these effects are irreversible. All of these ecological concerns factor into the transmission line analyses assessment of project impacts to rare and sensitive species habitats and populations, assumptions upon which magnitude of disturbance effects are base, assumptions on which various mitigation and other models are based, etc.	Your letter to CEQ is noted.
101493	(i)	B KER	am opposed to any use of public land for this transmission line. it is time for profiteers to get their profiteering out of the land that is national land. let them buy private land to put it on. that is the way to go in the future. we are sick and tired of having national land used for transmission lines. that is inappropriate use. the profiters are making hay on the taxpayers. this comment is for the public record.	Your opposition to using public land is noted. Given the land ownership patterns in Idaho, siting the line purely on private land would not be feasible.
101494	(i)	JACK DURHAM	Idaho Power placed the Hemingway sub-station so they could "connect" where they wanted. Don't allow that. Place the line right along the major roadways and leave the largely unaltered land alone. Don't disturb the Birds of Prey area.	Your support for placing the lines along major roads is noted.
101495	(i)	CHRIS THORSEN	I do not want them crossing BLM land.	Your opposition to crossing BLM-managed land is noted.
101503	(i)	WILDLANDS DEFENSE,KATIE FITE, WILDLANDS DEFENSE	Here are comments and concerns about analysis of adverse and cumulative impacts, and new information,, related to the B2H and Gateway West transmission line processes.	Your letter to the DOI is noted.
101504	(i)	CARTER WILSON,ALICE WILSON	we wish to support your Alternative 2 Route as options 8G & 8H have numerous detrimental aspects with the large towers and transmission lines. Highway 30 through that area is a state designated Scenic Byway showcasing The Thousand Springs area of the Snake River with a magnificent North American waterfowl flyway enjoyed by locals and tourism alike. Routing from Midpoint west through Bliss and King Hill is the most sensible idea and would be the least disruptive to the local areas.	Your support for Alternative 2 is noted.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101505	(i)	KIM BAISCH	I am very concerned with power lines running through the Hagerman area (alternative 5). I can't fathom why we would put power lines directly through Hagerman as it's a special bird reserve area. I ask myself the question of 'How many birds will die after flying against these lines'? Also, I can't think of one person who would like a tower overlooking their house or in their houses view!	Your concerns with Alternative 5 is noted.
101505	(ii)	KIM BAISCH	Go with Alternative 2 and save us all a lot of grief.	Your support for Alternative 2 is noted. Your opposition to having to look at towers is also noted. Impacts to scenery are discussed in Section 3.2.
101509	(i)	DOUG HIPWELL	I prefer Alternate one	Your support for Alternative 1 is noted.
101510	(i)	TIFFANY HIPWELL	Alternate 1 would be my choice.	Your support for Alternative 1 is noted.
101511	(i)	JUDY STACY	Alternate #1 only	Your support for Alternative 1 is noted.
101511	(ii)	JUDY STACY	I don't want my land to be used for these towers	Comment noted.
101512	(i)	CAROL BRAND,RICK BRAND	The only alternative is # one.	Your support for Alternative 1 is noted.
101512	(ii)	CAROL BRAND,RICK BRAND	They would completely ruin our land value and quality of life	See the discussion of property values in Section 3.4 of the 2013 FEIS. While there are no local studies on changes in property values following construction of a transmission line, studies in other areas indicate about a 10 percent decrease.
101513	(i)	BRETT ENDICOTT	Route 1	Your support for Alternative 1 is noted.
101513	(ii)	BRETT ENDICOTT	all of the other routes will cause property values to go down	Your support for Alternative 1 is noted.
101514	(i)	JANICE GERDES	Alternate #1 only	Your support for Alternative 1 is noted.
101514	(ii)	JANICE GERDES	I don't want it on my land. I lived at this address for 27 years and I don't want it to change	Your opposition to placing the line on your land is noted. Please note that the BLM only makes decision for federal land. The County has permitting authority over private land.
101515	(i)	PATTI CAMERON	support alternative 1	Your support for Alternative 1 is noted.
101516	(i)	TEENA LEWIS	Alternative 1 is the only one possible	Your support for Alternative 1 is noted.
101516	(ii)	TEENA LEWIS	this affects our property value	See the discussion of property values in Section 3.4 of the 2013 FEIS. While there are no local studies on changes in property values following construction of a transmission line, studies in other areas indicate about a 10 percent decrease.
101517	(i)	STEPHANIE TEETER	I strongly support Alternate 1 trough NCA, where there are existing roads and power transmission lines. Owyhee County – south of Hwy 78 is one of the few remaining untouched landscapes.	Your support for Alternative 1 is noted.
101518	(i)	NANCY BURKE	Segment 9 between miles 164-143 on "Alternative Detail Map" #19 is not an ideal location or a power line. It sandwiches a subdivision between two power lines.	Comment noted.
101519	(i)	WEBB LISLE	I would like the Gateway West Project stay completely out of Owyhee County. I think they should use the North Power Corridor that already exists. This project doesn't take in the livelyhod [sic] of the residents.	Your opposition to placing lines in Owyhee County and your preference for locating them where other lines exist is noted.
101520	(i)	JAMES HOWARD	I favor the route segment 9 route 8H that follows the existing high tension lines and towers that run thru the National Conservation Area. As a private pilot, the navigational hazards of the lines lying nearly 200 feet above ground level are a threat. By creating new routes or segments adds to our danger. Please keep them in the corridor I recognize and plan for. I have lost two pilot friends in the last ten years as a result of power line impacts. Both in SW Idaho from Idaho Power lines. Use the corridor that I know and recognize over the years.	Your preference for 8H is noted, as is your concern for pilot safety.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101521	(i)	PETE NIELSON	I'm in favor of Alternative (1) one. The route north and south interfere the least with private property. They go through areas of undeveloped ground that can be improved thru time with plants and cresten wheat grass. This will provide habitat for the townsend ground squirrel (whistle pigs) which will attract birds of prey. The towers for the power lines can be fitted with platforms that birds of prey can build their nests. This is quite an enhancement to the areas. Visitors will see more wildlife and raptors in action. The creston wheat grass also provide very good fire protection. The end result is less private ground is subject to the effects of the transmission lines and the areas in use become more valuable in public use both for visitation and enhancement of mature birds of prey. In fact, the encroachment to birds of prey areas will be enhanced for the above reasons plus less wildfires in the areas involved. This particular alternative (1) benefits all areas of the Gateway Transmission project allowing us to have good transmission of power and good enhancement of the area involved.	Your support for Alternative 1 is noted.
101522	(i)	BONNIE LISLE	This powerline needs to stay north of the Snake River. This would ruin the lives and livelihood of so many people in Owyhee County. The power line should follow in the existing power corridor north of the Snake River.	Comment noted
101523	(i)	DEAN SWAGER	raising Holstein heifors with high voltage power lines overhead, we experienced many detrimental factors with this. I would appreciate consideration in routing your lines to the north of our property which is BLM land anyway.	CAFOs would be avoided during design.
101524	(i)	LINDA KLUGE	Alternative 1. The economy of our valley. Scenic view.	Your support for Alternative 1 is noted.
101525	(i)	RICHARD KERSHNER	It is far away from Kuna that it is ok for us. (Line 8)	Comment noted.
101526	(i)	DENNIS VANDERSTELT	The revision segment 8 that stays well south of kuna is acceptable. The two southern routes are also acceptable.	Comment noted.
101527	(i)	CARL G VAN SLYKE	I prefer alternative 2 – looks most feasible to me.	Your support for revised Alternative 2 is noted.
101528	(i)	LARRY GEREN	Stay with alternative route #2.	Your support for Alternative 2 is noted.
101529	(i)	LARRY GEREN	Alternative #1	Your support for Alternative 1 is noted.
101530	(i)	KATIE FITE, WILDLANDS DEFENSE	We oppose locating this line outside of existing powerline corridors. Co-locate the entire line.	Your support for co-locating the line with existing lines is noted.
101530	(ii)	KATIE FITE, WILDLANDS DEFENSE	The wildlife habitat baseline and surveys are greatly inadequate.	Comment noted, see the response to your similar comment above.
101530	(iii)	KATIE FITE, WILDLANDS DEFENSE	There is no adequate information on the many impacts of the route on migrating birds and the many cumulative effects on avian species and bats.	Comment noted, see the response to your similar comment above.
101531	(i)	GARY CHRISTENSEN	I believe that alternative #1 is the route to take with the least impact on residents and the environment.	Your support for Alternative 1 is noted.
101532	(i)	ALBERT GABIOLA	We favor the section 8 revised proposed route. We hope this will be the final route as we believe is should have the least impact on GLC 120 acres of land.	Your support for revised proposed 8 is noted.
101533	(i)	BRIAN AND CHRISTINE COLLETT	I guess the first comment would be that as a tax payer, it seemed like the open house was a complete waste of time. We were pretty sure the RAC, the Power Companies and the State BLM had agreed that the best place for this transmission line was Alternative 1, through the Birds of Prey. Why do we need someone who has no idea what they are talking about from the East tell us what is best out here in the West.	Your comment on the open house is noted, as is your support for Alternative 1.
101533	(ii)	BRIAN AND CHRISTINE COLLETT	Recently the BLM had a transmission line that ran across our spring and winter range taken out due to the sage grouse. They put this transmission line in for a missile the military was going to shoot off from Grand View to New Mexico. The predators could sit atop this line and look for the grouse on the ground, a very good vantage point for the kill. Why then would we put a line back across sage grouse habitat?	Comment noted.
101533	(iii)	BRIAN AND CHRISTINE COLLETT	As ranchers and having to work with the BLM, we know that we are probably wasting our time putting in this comment, we have experience that tells us that no matter what the BLM is going to do as they wish, like they hold all the cards, well you do not. The people here in Owyhee County are not going to let this drop, they are not going to be ramrodded by the BLM.	Please note that the BLM only approves the lines on federal land. The county has permitting authority for private land. Please note that 93 percent of Route 9K through Owyhee County is on federal land.
101533	(iv)	BRIAN AND CHRISTINE COLLETT	Let us use some common sense in this matter and go with Alternative 1 that was agreed on by all parties that really matter. All other alternatives should be disregarded.	Your support for Alternative 1 is noted.
101534	(i)	NICK IHLI	I firmly believe that the segments 8 and 9 of the proposed project as altered by the southern most route (skirting around Grand View Valley) should be highly considered.	The comment appears to refer to 8G/9K (Alternative 5). Your support for this alternative is noted.
101535	(i)	ELVIN LEO CLOYD	Put it through the birds of pray area	Your support for lines crossing the SRBOP is noted.
101544	(i)	RICHARD FARMER,SUE FARMER	New proposed routing of Gateway West Transmission Lines thru Birds of Prey ("SEGMENT 8 REVISED PROPOSED ROUTE") is satisfactory.	Your support for lines crossing the SRBOP is noted.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101545	(i)	ELIAS JACA	This should go through the NCA period	Your support for Alternative 1 is noted.
101545	(ii)	ELIAS JACA	it will destroy our Owyhee County and destroy to extinction the sage grouse	Comment noted. The USFWS has concluded in their BO that it would not lead to the extinction of the sage-grouse.
101546	(i)	OREGON CALIFORNIA TRAILS ASSOCIATION,WALTER MEYER	The Draft Supplemental EIS for the Gateway West Transmission Line Project does an excellent job at analyzing the impacts of the various alternative routes on the Oregon National Historic Trail (NHT) and related historic resources.	The BLM greatly appreciates OCTA's comments and continuing involvement in the SEIS process. We share the group's commitment to preservation of NHT values affected by the proposed project.
101546	(ii)	OREGON CALIFORNIA TRAILS ASSOCIATION,WALTER MEYER	The Idaho Chapter of the Oregon-California Trails Association recommends that if a transmission line is determined necessary, that either Alternative Routes 4 or 5 be selected as the proposed action in the Final EIS. These two routes have the least adverse impacts on the NHT.	Your preference for either Alternative 4 or 5 is noted. NHT values are among several critical resources the BLM will consider as it formulates a decision for Segments 8 and 9.
101546	(iii)	OREGON CALIFORNIA TRAILS ASSOCIATION,WALTER MEYER	the Idaho Chapter of OCTA would like to offer the following mitigation measures where applicable: 1. Construction of trail heads (parking area with informational sign) where public roads provide access to historic trail remnants on public land. 2. Installation of gates and/or stiles where fences cross trail remnants. 3. Installation of interpretive signs at or near historic sites or features. 4. In addition to acquisition of preservation/public access easements along NHT remnants on private lands, the acquisition, through land exchanges, of state lands with NHT remnants. 5. The closure of certain Oregon NHT segments to motorized use. 6. The establishment of a program to monitor, by ground and air, the conditions of the Oregon NHT.	These measures are considered and included as appropriate in the Final SEIS revised mitigation framework (Appendix K).
101547	(i)	SUZANNE C MURPHEY	I sincerely believe that the 9K Gateway West route currently proposed to run on the south side of Salmon Falls Creek in the Castleford area is the best choice. That route would have the least impact on many families, mine included, and would have significant financial advantage.	All the segment 9 routes considered in the SEIS follow the same alignment in the Castleford area. They would be on the west side of Salmon Falls Creek from Lily Grade north.
101548	(i)	GORDON THOMPSON	(Alternative 1) is the only common sense Route that should be taken. The impact is already there with the line in place. The roads are there, wildlife has gotten use to poles, lines and any other things going on with the line. There is no need to spend money and time making the change. Unless your budget is to large and you feel the need to spend tax payer money for fun. (Alternative 1 is the only choice.)	Your support for Alternative 1 is noted.
101550	(i)	OPAL WARD	I am in favor of Alternative 1. I am against Alternatives 2 and 5, as well as all other alternatives. Alternative 1 is the only one that does not take away the private landowners rights in Owyhee County. The Resource Advisory Council worked very hard to create a detailed report that provides a scientific basis for the recommended rates in Alternative One. These routes were adopted by Idaho Power and Rocky Mountain Power as feasible routes. The people in the affected Owyhee County areas fully expected the BLM office in Washington D. C. to agree with all those who worked to find the best and most reasonable route for these towers. When the Draft Supplemental Environmental Impact Statement was finally published in March, 2016, we were all devastated to find out all of this hard work was thrown away.	Your support for Alternative 1 and opposition to 2 and 5 is noted.
101550	(ii)	OPAL WARD	The rationale for Alternatives 2 and 5 is not even clearly stated in the DSEIS. These two routes will have very serious socio-economic impacts for all of Owyhee County. It will not only affect the farmers and ranchers in the area the towers go through; it will affect the tax base of the county, the businesses in all the small towns and the workers on the farms and ranches; as well as the small country school districts. These farmers and ranchers cannot afford to move the pivots, put in two smaller pivots where one was, and/or move their cattle, corrals and etc. The ranchers cannot afford to hire extra workers to help control the cattle and keep them calm when all the equipment, trucks and people invade their space. These are real people who raise your food. Some of these farms and ranches are 4th or more generation farms and ranches. When the people can no longer farm or raise cattle, horses and sheep- where will they go and what will they do? Future generations, as well as the present owners, deserve to not have their way of life casually destroyed by those in the BLM Office in Washington DC. It is a sad thing when someone who cannot even imagine the kind of life we have here is so willing to destroy it. The Washington D.C. BLM office has failed to get a consensus agreement of the people that will be most affected by Alternatives 2 and 5. The BLM has failed to meet the purpose of the DSEIS. Alternative 1 is the only Alternative that makes sense in any way.	Comment noted. Effects on agriculture are addressed in section 3.18 of the 2013 FEIS, socioeconomic effects in Section 3.4 of that document. The intent is to avoid impacting pivots during the design phase. Please note that 93 percent of Route 9K through Owyhee County is on federal land.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101551	(i)	SUSIE LOW	I would like to have alternative 1 - This route stays away from going over our house and Barn. [Illegible] the most worst way it could go - seems to be the way BLM has picked - going over our house is very dangerous with our metal roof and metal barn - if any one cares you have thousands of open ground but you deliberately pick the most destructive one to the people. I pick alternative one.	Your support for Alternative 1 is noted.
101552	(i)	ROBERT E KNAPP	I want to comment on the New Proposed Routing of Gateway West Transmission Lines, Segment 8G/9K is Unsatisfactory. I have throughly studied this segment and I do not want this transmission line to come through the City of Melba including the City's Impact Zone! This routing interferes with Private Properties, and I am a property owner impacted by this proposed routing.	Your opposition to 8G/9K is noted.
101555	(i)	ROBERT MANCUSO	This letter is my notice to you that I will not allow the use of my private land for the FEIS Proposed route for Segments 8G, 9F and 9K in Owyhee County. I will not be a willing seller of a right of way for the route. I will not allow an application for an Owyhee County Planning and Zoning Commission Conditional Use Permit for the structures or associated infrastructure supporting that route.	Your position on allowing the use of your land is noted. The BLM does not approve transmission lines (or anything else) on private lands. This is a county function in Idaho. The BLM only makes decisions regarding federal lands.
101556	(i)	DAVID L PALFREYMAN	After studying the various Gateway West Transmission Line Proposals (Line(s)), I find the new proposed routing of Lines thru Birds of Prey (Segment 8 Revised Proposed Route) to be acceptable. This Line proposal virtually avoids private property. Avoiding private property in my opinion, is the most important factor. Also, it is the least disruptive. The new proposed routing of Lines (Segment 8G/9K) is unsatisfactory. Unlike Segment 8 (Revised Proposed Route), it interferes with private property, which in my opinion is unacceptable. Thanks for your time, David L. Palfreyman, private property owner near Rim and Melba Road.	Your support for lines crossing the SRBOP is noted.
101557	(i)	SCOTT & ZOEANN GREENFIELD	The new proposed routing of Gateway West Transmission lines thru Birds of Prey is definitely satisfactory. This would be the "Segment 8 revised proposed route". This route was studied comprehensively and recommended by RACK Committee.	Your support for lines crossing the SRBOP is noted.
101557	(ii)	SCOTT & ZOEANN GREENFIELD	The original proposed route and the new proposed routing "Segment 8G/8K" were unsatisfactory. These routes were studied comprehensively and not recommended by RACK Committee.	Your opposition to 8G/9K and the FEIS Proposed Route is noted.
101558	(i)	CHAD THOMPSON	Please choose the most economical route possible, leveraging federal land when available.	Your support for choosing the most economical route is noted, as is you preference for crossing federal land. Choosing the route based on economics alone would likely have a greater impact on people and wildlife.
101559	(i)	JOYCE BURCH	Segment 8 Revised Proposed Route through Birds of Prey should be used. It runs less on private properties than the other routes, and the RACK Committee recommends it after extensive study. Segment 8G/9K interferes too much with private property. The Birds of Prey area already has large power lines running through it without causing detriment to the wildlife, so why would you think lines in the Birds of Prey would be more of a problem than lines going over private property? We need to stick with Segment 8 Revised Proposed Route.	Your support for lines crossing the SRBOP is noted.
101560	(i)	ANN SARGENT	do not approve any plan that goes through the Bird's of Prey area and along the ridge of the Snake River Canyon	Your opposition to lines in the SRBOP is noted.
101561	(i)	MONICA SMITH	I support the new proposed routing of lines through the Birds of Prey (Segment 8 revised proposed route)	Your support for the segment 8 revised proposed route is noted.
101562	(i)	DUNCAN FARRIS	New proposed routing of Gateway West transmission lines through Birds of Prey ("Segment 8 Revised Proposed Route") is satisfactory.	Your support for the segment 8 revised proposed route is noted.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101563	(i)	MITCHELL MURPHY,RENAY ROBISON	Union Pacific Railroad objects to any route that runs parallel within three hundred (300) feet of railroad right of way, measured from the centerline of our track. All parallel occupants must be 300 feet off of track. Union Pacific Railroad will only allow crossings of railroad right of way at a degree of ninety (90°), or as close to ninety degrees (90°) as possible without going beyond the degree range of forty-five (45°). Union Pacific Railroad does not allow for any structures to be erected on railroad right of way. All crossings will require a future agreement with Union Pacific Railroad as to how to construct and maintain. his objection is based upon the lack of detailed information to fully understand the project and the impact this high voltage wireline may have on Railroad property. If the above conditions cannot be met, all consideration of the project should be subject to a full mitigation study at the expense of Rocky Mountain Power and Idaho Power. Any concerns resulting from the mitigation study must be required to be addressed to avoid any damage to Union Pacific Railroad's signal and communication facilities. Safety is the primary driver for this requested requirement. Unmitigated high voltage power lines in close proximity to railroad tracks can have an adverse affect upon railroad signals, especially grade crossing warning devices. In general, the more power that flows through the wires, the greater effect it has upon the railroad equipment. Union Pacific Railroad reviews proposed installations on or near its right of way by examining factors such as the distance between the wire and the rails and how far the power line parallels the tracks to evaluate the potential for the power lines to affect the safe operation of railroad signaling equipment. Other adverse affects on railroad equipment come from ground fault events. These events cause a great deal of energy to flow through the ground from the power company's towers and/or substations, through the rails, and directly into signal equipment. Such events can cause tens or hundreds of thousands of dollars worth of damages during a single event. These occurrences can cause the destruction of railroad equipment for several miles. In one area, well documented events have repeatedly destroyed grade crossing warning devices for several miles. In addition to the potential to cause damage to railroad equipment, railroad personnel or anyone else touching the rails can be subject to injury from electrical shock.	The Segment 8 Revised proposed Route crosses the railroad on BLM-managed land. Routes 8G and 8H cross an Eastern Idaho Railroad (EIRR) line on private property. The Segment 9 crossings of a north-south spur line that connects the EIRR near Twin Falls, Idaho, to the Union Pacific line in northeastern Nevada, also occur on private property. None of the routes parallel the railroads within 300 feet of the railroad track. The closest a parallel route comes to the track is Alternative 8B from the FEIS, it parallels the Union Pacific track and an adjacent spur line for approximately 12.5 miles at a distance of 0.3 to 1.5 miles. This information has been included in the Transportation section. The BLM recognizes that the railroad easements have established rights. The proponents are responsible for coordinating with the railroad.
101563	(ii)	MITCHELL MURPHY,RENAY ROBISON	Information and application forms concerning requests for wireline crossings across Union Pacific Railroad's property may be found on the internet at: hllp://www.up.com/real_eslate/utilities/index.htm. Engineering specifications regarding crossings have been attached, and can be found as well at http://www.up.com/real_estate/utilities/wireline/wirespecs/index.htm. Proposals that call for placement of improvements on or under our property require greater evaluation and tend to be more difficult to approve, particularly where wirelines parallel our tracks with voltage. Further information regarding requests for such encroachments may be found on our website at: www .uprr.com/reus/encroach/procedures.html and www.uprr.com/reus/encroach/encguides.html. In all instances, there must also be a meeting of the minds on compensation for the right to cross the property. By this letter, Union Pacific Railroad requests the Bureau of Land Management require Rocky Mountain Power and Idaho Power to abide by these conditions presented above. If they have questions on requirements, please encourage them to reach out to me. The railroad reserves its rights to present comments on the proposal and to seek any legal, administrative, and other remedies that may be necessary to preserve Union Pacific Railroad's franchise and property rights.	The proponents are responsible for coordinating with the railroad in order to acquire permission to cross the railroad's easement.
101564	(i)	BILL & BEVERLY WHITE	We completely endorse alternative 1	Your support for Alternative 1 is noted.
101564	(ii)	BILL & BEVERLY WHITE	We oppose Alternatives 2-7 because they will severally impact our private property, much of which is irrigated by pivots. These alternatives 2-7, will also greatly impact the Sage Grouse, if a loss of 20% or greater in numbers is reached, the BLM will shut down the land for cattle grazing and also any other multiple use of the land. Putting most all ranchers out of business.	Your opposition to Alternatives 2 through 7 is noted.
101564	(iii)	BILL & BEVERLY WHITE	If this were to happen it would also affect the local economy, shutting down the businesses and small towns of Owyhee County, causing great economical disaster. Our tax base to help support our schools would be lost. Also 2-7 has the ability to rob us of any financial income from sub-dividing a small portion of our property, as well as lowering the property value that we have worked so hard to increase to support our retirement.	We are not aware of any evidence that businesses in the county would close due any of the proposed alternatives. The proponents would pay property taxes on the transmission lines (see the tables in section 3.4). Taxes would increase, not decrease. However, 93 percent of Route 9K through Owyhee County is on federal land, which reduces the impact to private landowners.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101565	(i)	SUZANNE MANDEVILLE,JIM MANDEVILLE	Site = our house under the current line(s). - Electricity on site higher than a "flashlight battery" without a "double line - figured this out while bldg. our home. -Air quality - rain and wind definately affect site. -Galloping lines with wind. -No way to apply de-icing technique due to geographical obstacles. Result in touching lines and burning) -Not a reliable access of electricity if the only lines are placed in one area, namely Hagerman, ID. -Residential area -Agricultural area 3.18 -Soils 3.15 -Wildlife and fishery 3.10 - Birds - Noise - sounds like a constant idle of a truck - when it's slightly windy, sounds like an electrical rain. - This area is a "scenic" area, hard to obtain that status. - There are enough lines, tine can water carry man made ugly things here, not to mention the ugly windmills. - 250 feet is not an accurate picture as it is 250 on center - which means 30' ea transmission line making the correct number 190' apart. - Power employees use a device to measure ? current?? - This has been observed at the Hagerman RV park where employees frequently stay. - What would be the response of an employee asked to live, raise their family, farm and recreate here in Hagerman under the double transmission lines?	The intent of this comment is not clear.
101566	(i)	CHARLES DALE WILLIS JR	After careful review, I am in Favor of "Segment 8 Revised Proposed Route	Your support for revised Proposed 8 is noted.
101566	(i)	CHARLES DALE WILLIS JR	NOT" in favor of Proposed Segment 8G/9K	Your opposition to 8G/9K is noted.
101567	(i)	JOZEF ZOLDOS	After careful review, I am in Favor of "Segment 8 Revised Proposed Route	Your support for revised Proposed 8 is noted.
101567	(ii)	JOZEF ZOLDOS	NOT" in favor of Proposed Segment 8G/9K	Your opposition to 8G/9K is noted.
101568	(i)	PAUL BERGGREEN	After careful review, I am in Favor of "Segment 8 Revised Proposed Route	Your support for revised Proposed 8 is noted.
101568	(ii)	PAUL BERGGREEN	NOT" in favor of Proposed Segment 8G/9K	Your opposition to 8G/9K is noted.
101569	(i)	MARCY PETERSON	There is not one person who is not against your preferred routes of alternatives 2 thru 7. The Southern Alternatives in Owyhee County are not only stupidly out of the way longer and more difficult to build and maintain, but these southern routes will also drastically impact sage grouse habitat.	Comment noted; however, it is not completely correct. We have received some comments in support of placing the line along the WWE corridor.
101569	(ii)	MARCY PETERSON	I will just say, if you need to get the energy to the big cities, use the best route, Alternative 1. They can get it done faster and better using Alternative One.	Your support for Alternative 1 is noted.
101570	(i)	NANCI HALVERSON	I would prefer the alternate #2 route but would be okay with the #alt 1 route if necessary	Your support for Alternative 2 and your acceptance of Alternative 1 is noted.
101570	(ii)	NANCI HALVERSON	I am concerned about the impacts on the environment, right of ways, and lowered property values this could cause. There are many deer, pheasant, quail, owls, foxes, etc in this area. I totally oppose routes 8G & 8H because of these factors.	Your opposition to 8G/9K because of the adverse effects to wildlife is noted.
101571	(i)	RICHARD C WILLIAMS	The proposed routing of the Gateway West Transmission Lines thru the Birds of Prey (Segment 8 revised Proposed Route) is satisfactory. This was studied comprehensively and recommended by the RACK Committee. It, fortunately, almost entirely avoids private property.	Your support for revised Proposed 8 is noted.
101571	(ii)	RICHARD C WILLIAMS	The new proposed routing of Gateway West Transmission Lines (Segment 8G/9K) is very unsatisfactory. This again was studied and NOT recommended by the RACK Committee. It interferes greatly with private property.	Your opposition to 8G/9K is noted.
101572	(i)	SHARON STRICKLAND	We recommend Alternative 5, encompassing EIS route 8G/9K. This alternative takes the line where it should be; i.e., beside the existing line of like size.	Your support for Alternative 5 is noted.
101573	(i)	GARY CUNNINGHAM,JERRY CUNNINGHAM	We prefer alternate 1	Your support for Alternative 1 is noted.
101573	(ii)	GARY CUNNINGHAM,JERRY CUNNINGHAM	because it does not affect as much private property as alternate 2 and 5	Your support for Alternative 1 is noted.
101573	(iii)	GARY CUNNINGHAM,JERRY CUNNINGHAM	Who will pay for our schools, roads, police and fire services? It won't be the federal government, or Idaho Power!! The remaining farms and ranches can not absorb the increase in property taxes to pay for these items	Any new roads associated with the project would be paid for by the proponents. The proponents would pay property taxes on the transmission lines (see the tables in Section 3.4), which would support local services.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101574	(i)	PEGGY FRIDDLE	I very much would like to see it go thru the Birds of Prey grounds. I firmly believe the birds that are in that area will adjust very well to the lines and find they are great places to sit and look down to see a rodent.	Your comment that the birds in the NCA would adjust to additional lines is noted.
101575	(i)	LLOYD CHAMPAGNE	After careful review, I am in Favor of "Segment 8 Revised Proposed Route	Your support for revised Proposed 8 is noted.
101575	(ii)	LLOYD CHAMPAGNE	NOT" in favor of Proposed Segment 8G/9K	Your opposition to 8G/9K is noted.
101576	(i)	CONNIE HOLLOWAY	Alternatives 2-7 will impact many farms/ranches. Personal property values will tank. We should not be made to suffer the costs for this project that has monetary gains for their companies. The land will suffer as well, and we are the voice now for the land and critters. These alternatives would destroy all I value.	See the discussion of property values in Section 3.4 of the 2013 FEIS. While there are no local studies on changes in property values following construction of a transmission line, studies in other areas indicate about a 10 percent decrease.
101576	(ii)	CONNIE HOLLOWAY	Alternatives 2 through seven will impact Sage Grouse. If we loose 20% of bird or habitat the BLM will shut the land down. The Owyhee cattlemen will be out of business over night. We must not have another species go instinct. These alternatives would aid in the possibility.	Comment noted.
101576	(iii)	CONNIE HOLLOWAY	Alternative 2 through 7 once again if we loose 20 % of bird or habitat no one will be allowed to walk out in the public land, use an ATV, ride a horse, rock hound or explore historic sites. The land will be shut down. Again, I bought my 50 acres here to enjoy and respect the land. I participate in horse in endurance rides in this area and know the land intimately.. These alternatives would destroy all I value	Effects on sage-grouse are discussed in Section 3.11. We are not aware of any evidence that any of the alternatives considered in the SEIS would reduce sage-grouse populations by 20 percent.
101576	(iv)	CONNIE HOLLOWAY	If we allow farmland to be rendered useless, the Owyhee cattleman will be forced out of business, personal property values will tank, property earmarked for development will not be able to come to fruition gutting the retirement plans of the hard working men and women that feed us. 74% of Owyhee County's economy is agriculturally based. Once this is decimated the small businesses that serve the farmer/rancher will also fold up. Citizens from other counties and or states who come to Owyhee County for recreation will never reenter our county once the public lands have been shut down. Our tax base will be gutted. Owyhee County will be a wasteland	See Section 3.18 in the 2013 FEIS for a detailed discussion about effects to farmland and farm operations. This was prepared by an agricultural specialist in cooperation with farmers in Power, Twin Falls, and Cassia County (Owyhee County was not involved because the county chose not be a cooperator in the Gateway West EIS). Please note that 93 percent of Route 9K through Owyhee County is on federal land.
101576	(v)	CONNIE HOLLOWAY	Alternative 1… I STRONGLY ENDORSE Idaho Power's proposal for Kuna/Melba parallels the existing 500kV line in the SRBOP NCA and also utilizes an existing road. Idaho Power's proposal for Owyhee County parallels an existing 138kV line also located in the NCA utilizing a new road built in 2009. Once this new 500kV line is constructed Idaho Power will move the 138kV line onto the newly constructed 500kV line thus leaving only one tower line footprint. This alternative is where the environmental impact already is, concerning not only the two 500kV lines but the existing roads as well. This is the Alternative recommended by the Resource Advisory Council (RAC) to the BLM. December 5th 2013 the Sub RAC Committee was told that the siting of both of these 500 kV lines would be an Idaho decision and that the BLM would abide by the recommendations of the RAC committee. This is the only alternative with 100% consensus in Idaho. This is the only Alternative that makes any sense for me and the environment.	Your strong support for Alternative 1 is noted. The RAC is an advisory committee; their comments and their recommended alternative were fully considered in the SEIS. The routes they recommended became the Proposed Action and were analyzed as Alternative 1.
101576	(vi)	CONNIE HOLLOWAY	Alternatives 2 through 7 I STRONGLY OPPOSE All six of these Alternatives have one or both 500kV lines sited where they will do irreparable damage to Owyhee County. Alternatives 2, 4 and 6 site a 500kV line in the WWEC severely impacting private property, homes and farmland much of which is irrigated with center pivots. Obviously private property values will decrease. Farmers will be severely impacted because the span between the 500kV towers is less than the span of the center pivots, a nightmare for the hardworking men and women who are trying to feed us. Alternatives 3, 4, 5 and 7 I strongly opposed. All of these alternatives site the 500kV line just south of most of the private land. Landowners on Hot Spring Road in Bruneau will be one mile in this Corridor. The 500kV line(s) follows the "Wild and Scenic" Bruneau River. The line then runs west to northwest impacting the most southern private properties. The line heads straight north at Birch Creek slicing through multiple properties in Oreana then parallel Hwy 78 to Sinker Creek. It continues on northwest impacting the Joyce Ranch between Paul Nettleton's home and his reservoir. The Gene Lewis Subdivision outside Murphy would also be impacted by these alternatives. The majority of the public land impacted by these alternatives is classified as "green" by the BLM. In other words this is virgin land that is without any infrastructure. It makes absolutely no sense to annihilate miles of virgin territory with challenging topography.	Your strong opposition to the other 6 alternatives is noted. The intent is to avoid impacting pivots during the design phase. Please note that 93 percent of Route 9K through Owyhee County is on federal land.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101576	(vii)	CONNIE HOLLOWAY	The biggest threat to Owyhee County is the impact these alternatives will have on the Sage Grouse. June 2015 the BLM released the Final Environmental Impact Statement (FEIS) on the Sage Grouse document. September 2015 the BLM released the Record of Decision (ROD) on the Sage Grouse. Chapter 2 page 50 of the FEIS and chapter 2 page 32 of the ROD state "PHMA (priority habitat), IHMA (Important habitat) and GHMA (general habitat) are designated as avoidance areas for high voltage transmission line and large pipeline right of ways except for Gateway West and Boardman to Hemmingway transmission projects". The BLM has determined that a loss of 20 % of Sage Grouse or Sage Brush will hit a "hard trigger" and the BLM will shut the land down.	None of the routes cross priority sage-grouse habitat in Owyhee County. Please see the analysis in Section 3.11 for effects on sage-grouse.
101576	(viii)	CONNIE HOLLOWAY	THE BOTTOM LINE IS THAT ALTERNATE 1 IS THE ONLY ALTERNATIVE THAT PROTECTS PEOPLE AND SAGE GROUSE.IT IS THE ONLY SCIENCE BASED ALTERNATIVE.	Your support for Alternative 1 is noted.
101577	(i)	JOHN ENGLE	New proposed routing of Gateway West Transmission Lines thru Birds of Prey (Segment 8 Rived Proposed route) is satisfactory. It avoids private property almost entirely and was studied comprehensively and was recommended by the RACK Committee.	Your support for placing the lines in the SRBOP in order to avoid private land is noted.
101577	(ii)	JOHN ENGLE	New proposed routing of Gateway West Transmission Lines (Segment 8G/9K) is unsatisfactory. It interferes with private property	Your comment that 8G/9K is unsatisfactory is noted.
101578	(i)	KRISTY PIGEON,JOHN D PRUDDEN	A large transmission line on our property would cause economic hardship by impacting the agricultural operation of the ranch.	Comment noted. See the analysis of effects to farmland and farm operations in Section 3.18 of the 2013 FEIS.
101578	(ii)	KRISTY PIGEON,JOHN D PRUDDEN	The line would cause additional grave economic hardship by greatly reducing the property value.	See the discussion of property values in Section 3.4 of the 2013 FEIS. While there are no local studies on changes in property values following construction of a transmission line, studies in other areas indicate about a 10 percent decrease.
101578	(iii)	KRISTY PIGEON,JOHN D PRUDDEN	We ENDORSE ALTERNATIVE 1 This route is clearly the most logical because it supports an existing line and roads. In addition, this route would have the least amount of negative impact on private property. Raptors in the Snake River Birds of Prey would benefit from this route.	Your support for Alternative 1 is noted.
101578	(iv)	KRISTY PIGEON,JOHN D PRUDDEN	We are OPPOSED TO ALTERNATIVES 2 – 7	Your opposition to Alternatives 2 and 5 is noted.
101579	(i)	JIM WUEHLER,DEE WUEHLER	In regards to the above section 3.10, something such as wildlife habitat can be studied to death. The Morley Nelson Snake River Birds of Prey NCA, was created to protect habitat for birds of prey. Period. It should be left alone, no intrusions, no power line. The same can be said for section 3.11, as the Soda fire burned almost 226,000 acres. A devastating fire. Do we really know the full impact on the grouse? We doubt it.	Comment noted. The Soda Fire ESR Plan discusses the effects of the fire on sage-grouse and their habitat and the Soda Fire Fuel break EA discusses the effects of the proposed fuel breaks on sage-grouse and sage-grouse habitat.
101580	(i)	JERRY TLUCEK	The present plan for the proposed Gateway West would drastically affect 230 acres of our farmland, which is selling for $7000.00 to $9000.00 per acre. In addition we have 5 center pivots that would be affected that we could not operate, valued at $350,000.00 to $400,000.00. If the transmission line was moved approximately 3/4 of a mile south as it passes our property for one mile that would eliminate the disaster. We will do legally all we can to keep it from destroying our right to farm these acres. (Total value approximately $2,300,000.00)	The Proponents would work with landowners during the design phase to avoid pivot systems to the extent possible. Please note that the county is responsible for permitting transmissions line construction on private land, not the BLM.
101581	(i)	KELLY MURPHEY	With reference to Segment 9, in the Castleford vicinity, the FEIS proposed route is acceptable. The Tuanna Road option(s) of 1/1A are also deemed ok. as minor variations in the proposed route.	Comments noted.
101582	(i)	RAY FAULKNER	Segment 8 Revised Proposed Route. We don't want to live between two lines.	Your support for segment 8 revised proposed route is noted.
101583	(i)	MICHAEL KERSHNER	Put people first. People on private property will lose income if you site the project through their land. This is their business, being a farmer. If you mess with them, there's not a lot they can do about it except go into ruin. Wildlife like birds of prey and sage-grouse and other animals are flexible and they can find other places to live.	Comment noted.
101584	(i)	CORY GONTERMAN	In the castleford area I think that the transmission line needs to be on south and west side of salmon falls creek canyon to help keep the impact down on faimly farms that are in the area of one of the proposed transmission line foot print	All the segment 9 routes considered in the SEIS follow the same alignment in the Castleford area. They would be on the west side of Salmon Falls Creek from Lily Grade north.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101585	(i)	QUEY JOHNS	I am in favor of route 9. Idaho power is supposed to use corridors through the BLM so as to not go through private property. Idaho Power should avoid private property at all costs. Route 9 is good and should go through the birds of prey land. Keep it out of Grand View and off of private property. Use the BLM.	We assume that you are referring to the segment 9 revised proposed route, your support for that route is noted.
101586	(i)	BART FOWERS	Sirs, I own farm ground situated in Owyhee County that would be impacted if Segment 9 FEIS Proposed route is used. Particularly, I have a pivot that is 2485 feet long that is situated in the middle of this route. It would cause me to not use it or to go to great expense to reconfigure the irrigation system to accommodate smaller pivots and different forms of irrigation for the resulting corners. In another area it would cause a situation to which I couldn't connect my wheel line move sprinklers to the pipe line for water, resulting in addition cost to install new pipe line and risers around the base of the towers and taking the wheel move lines apart each time they encountered a tower base. Also, installing a power line through my property is not an approved use of my farm ground.	If the FEIS Proposed Route is selected, the Proponents would work with landowners during the design phase to avoid pivot systems to the extent possible. Please note that the county is responsible for permitting transmissions line construction on private land, not the BLM.
101586	(ii)	BART FOWERS	I would request that Segment 9 revised proposed route or Route 9K be used as they would cross more public land and less private land.	Your support for locating lines on public land is noted.
101587	(i)	CHAD NETTLETON	Alternatives 2,3,4,5,6 and 7 are positively unacceptable. I endorse alternative 1 because it will place the line in the most logical place. The Morley Nelson Snake River Birds of Prey NCA already has a transmission line through it. The raptors will not be negatively affected by the line as it will actually provide a perch to hunt from. It is the most direct route saving the electrical companies money. It is the flattest smoothest and easiest to traverse route. It doesn't have the delicate and diverse ecosystem that the southern routes would disturb. Sadly the NCA is a wasteland of cheatgrass and noxious weeds anyway. I find it to be absolutely ridiculous that the BLM is more worried about setting a precedent than they are about getting this transmission line cited in the best place for the people, wildlife and landscapes of Idaho. It isn't very often that the ranchers, recreational users, political leader, ordinary citizens and environmentalists are all on the same page about public land use. In this situation however the vast majority of of all of these groups agree that the transmission line should be cited through the birds of prey. BLM needs to get with the program.	Your support for Alternative 1 is noted.
101587	(ii)	CHAD NETTLETON	We have the oldest family owned ranch in the state of Idaho. Several of these alternatives would split our ranch right down the middle. It would disrupt our cattle and farming operations in a litany of ways. I have spoken with ranchers that run cattle in areas with transmission lines running through them and in wet weather it is very difficult to trail cattle past them. Cattle a lot a lot more sensitive to electricity than people are. We have looked at placing irrigation pivots in different locations on our ranch and obviously the transmission line towers would prevent this depending on there placement. Constructing these towers would also be incredibly disruptive to our operation and our families. This merely scratches the surface of the problems this transmission line would create for us if it were pushed through our property.	The proponent would work with landowners to avoid impacts to pivots. The intent would be to place towers in areas between pivots and along the edges of fields. Please note that the BLM only choses the line location on federal land. Building the transmission line on private property would require county approval. Effects of the transmission lines on cattle grazing and on irrigated farmland are discussed in Section 3.18, EMF effects in Section 3.21.
101587	(iii)	CHAD NETTLETON	Additionally this transmission line would tank our private property values. For good reason no one wants to live right next to one. The compensation we will receive won't even come close to making us whole.	The estimated effect on property value is discussed in Section 3.4 of the 2013 FEIS. While there are no local studies on changes in property values following construction of a transmission line, studies in other areas indicate about a 10 percent decrease.
101587	(iv)	CHAD NETTLETON	I feel the bigger travesty would be the eyesore on this beautiful and mostly undisturbed landscape. As I travel Highway 78 and look to the south at the gorgeous snowcapped Owyhee mountains I can't imagine a large transmission line running through that rugged country and completely spoiling this magnificent view.	Comment noted. Effects on scenery are discussed in Section 3.2 and Appendices G and E.
101587	(v)	CHAD NETTLETON	If for no other reason this transmission line needs cited through the birds of prey because of the adverse impacts it would have on the sage grouse if it were put through the southernly routes. The construction, maintenance, and overall disruption of the area would destroy a vast swath of sage grouse habitat. Additionally it would provide a perch for predators to hunt sage grouse from. The cumulative effect would be devastating to a bird that is on the verge of being placed on the endangered species list.	All routes have been sited to avoid priority sage-grouse habitat in Owyhee County. A variation has been added to Alternative 5 hat moves the line to the east in order to reduce effects on sage-grouse from ravens and other birds of prey that may roost on the towers. The SEIS discloses that some predation would likely occur.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101588	(i)	MERRILAN SIMPER	It is evident that Alternative #1, the Snake River Birds of Prey National Conservation Area is the best option for the Gateway West Transmission Line Project. It benefits both birds and humans. There is an existing 138 kV line and a road on this route. After the 500kV line is in place, then the 138kV line will be attached to the new towers. The impact will be only one power line with benefits to the raptors. The towers provide nesting areas, perches and hunting surveillance. Alternative #1 saves the humans from Alternative #2 which comes within 200 feet of our home and right down the middle of our farm. Besides the devaluation of our farm and home, the 500kV power live threatens our health.	Your comments on the benefits of Alternative 1 are noted.
101588	(ii)	MERRILAN SIMPER	Research proves that electricity is harmful to humans. Adults are 57-60% water and infants are 75-78% water making us conductors of electricity. We have our own electric pulse or frequency to help cell division, digestion, our heart and brain activity. Dr. Albert Szent-Gyrogyi, a Nobel Prize Winner, stated, “The living cell is essentially an electrical device.” Alternating current is an Electro Magnetic Field which disrupts our frequency. Even an electric alarm clock less than 4 feet away is not recommended. Another expert in this field also agrees that electricity has a negative impact on our health. The Dean at the School of Public Health, State University of New York, Dr. David Carpenter’s research concluded that excessive exposure to magnetic fields from power lines and other sources of electric current increases the risk of development of some cancers and neurodegenerative diseases,# and he believes that up to 30% of all childhood cancers come from exposure to Electro Magnetic Fields. Further research has brought to light that Electro Magnetic Field Exposure is linked to hypertension, miscarriages, the suppression of melatonin, damage to the blood-brain barrier, Alzheimer’s disease, breast, prostrate, and brain cancer,# childhood leukemia, and thyroid problems, also Attention Deficit Disorder and Hyperactive Disorder, diabetes, Multiple Sclerosis, ALS or Lou Gehrig’s disease, and asthma. EMF Exposure is also suspected of causing fiber myalgia, and depression, anxiety, chronic pain, memory loss, sleep disorders, tinnitus, respiratory problems# and chronic fatigue syndrome . Epidemiological studies in Sweden by Maria Feychting showed that individuals exposed to high levels of EMF had 3.7 times the risk of developing leukemia compared to those who were not exposed. These are the risks we will face if we have to live and work in our yards, garden and on our farm next to a 500,000 Volt Electro Magnetic Field with Alternate Route #2.	The effects of transmission lines on the electrical environment are discussed in Section 3.21. Also see Section 3.23 of the 2013 FEIS for information on health risks associated with transmission lines. The National Cancer Institute provides the following assessment: "No consistent evidence for an association between any source of non-ionizing EMF and cancer has been found." (http://www.cancer.gov/about-cancer/causes-prevention/risk/radiation/electromagnetic-fields-fact-sheet)
101589	(iii)	NATE GOOD	I strongly oppose the idea of the southern route for the power line that proposes to go through Owyhee county (segment 9FEIS and 8G/9K). Plowing the Gateway project though this sensitive desert land which is habitat for both raptors and sage grouse is not environmentally responsible when the option exists to use one of the northern alternate routes where power lines with roadways already exist.	Your opposition to FEIS Proposed 9 and 9K/8G because they cross routes through Owyhee County are noted.
101590	(i)	LAVONNE GOOD	I am not in favor of the southern route for the power line that proposes to go through Owyhee county (segment 9FEIS and 8G/9K). The Gateway project would interfere with valuable farm land, and the sage grouse. There is a much better option, to use one of the northern alternate routes where power lines with roadways already exist.	Your opposition to FEIS Proposed 9 and 9K/8G because they cross routes through Owyhee County are noted. The intent is to avoid impacting pivots during the design phase. Please note that 93 percent of Route 9K through Owyhee County is on federal land.
101591	(i)	CRYSTAL GOOD	I would like to see the Gateway project to go on the northern route, where it would be very useful for the birds of prey.	Your comments on the benefits to birds of prepare noted.
101592	(i)	AMBER GOOD	I would like to see the Gateway West project be put on the Northern side where it would not interfere with farmland and homes.	Your preference for placing the route to the north is noted.
101593	(i)	CHAD GOOD	I strongly oppose the southern route for the power line that would be going through Owyhee county (segment 9FEIS and 8G/9K). Use one of the northern alternate routes where power lines already exist.	Your opposition to FEIS Proposed 9 and 9K/8G because they cross routes through Owyhee County are noted.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101594	(i)	(ILLEGIBLE),JOE BIGGERSTAFF,JERILYNN BLUM,D TRENT BRIGGS,FRANKLIN CLARK,ALESHA CRIPE,BRYAN CRIPE,HYDEE DAS GUPTA,SHAYSHOSHEWA DAWE,STEPHEN DONAHUE,HEATHER DONAHUE,JERI ELDREDGE,LESLIE EMERSON,MICHELLE EVANS,DONNA FANSHAW,DANIEL FELL,JAMES FIGUEREDO,WILLIAM FOWKES,DEANIE GILBERT,ASHLEY HARKER,MARK HARRIS,TAETAY HEDGE,LYNNE JONES,RANDALL KAUFMAN,MEISHA KEENA,PAULA KOSBERG,LANCE KOSBERG,SCOTT LAM,CORY LESLIE,CRAIG LOGAN,JENNIFER MARIE LOGAN,ANDREW JAYCUB LOGAN,ELIZABETH MACINATA,ANAIA MAHOLA,EDWARD MAHOTA,MIKE MCALLISTER,KELLY MINIC,JUSTIN NICKOLS,ROBERT ORR,DOUGLAS PATTERSON,K ROSHELLE PEDERSON,SONYA PULGADO,AZULITE RONDEAU,ELIAH SENTAH STETSON BROWN,J A SMITH,JAYNE SORRELS,MICHELLE SPURLOCK,JOY STEVENSON,PETER TANO RIKIHO,LELELEWA TANO RIKIHO,CAMILLE THOM,LINDA VALENTINE,A'CHANNA VALLE,JENNA WOODS	We wish to voice our support of the pre-existing regulations governing the Morley Nelson Snake River Birds of Prey Conservation area. We believe it will set a damaging and dangerous precedent to the safety of Conservation areas through the United States if the rules governing this area are allowed to be undermined by private or business interests.	Your support for protecting the NCA is noted.
101594	(ii)	(ILLEGIBLE),JOE BIGGERSTAFF,JERILYNN BLUM,D TRENT BRIGGS,FRANKLIN CLARK,ALESHA CRIPE,BRYAN CRIPE,HYDEE DAS GUPTA,SHAYSHOSHEWA DAWE,STEPHEN DONAHUE,HEATHER DONAHUE,JERI ELDREDGE,LESLIE EMERSON,MICHELLE EVANS,DONNA FANSHAW,DANIEL FELL,JAMES FIGUEREDO,WILLIAM FOWKES,DEANIE GILBERT,ASHLEY HARKER,MARK HARRIS,TAETAY HEDGE,LYNNE JONES,RANDALL KAUFMAN,MEISHA KEENA,PAULA KOSBERG,LANCE KOSBERG,SCOTT LAM,CORY LESLIE,CRAIG LOGAN,JENNIFER MARIE LOGAN,ANDREW JAYCUB LOGAN,ELIZABETH MACINATA,ANAIA MAHOLA,EDWARD MAHOTA,MIKE MCALLISTER,KELLY MINIC,JUSTIN NICKOLS,ROBERT ORR,DOUGLAS PATTERSON,K ROSHELLE PEDERSON,SONYA PULGADO,AZULITE RONDEAU,ELIAH SENTAH STETSON BROWN,J A SMITH,JAYNE SORRELS,MICHELLE SPURLOCK,JOY STEVENSON,PETER TANO RIKIHO,LELELEWA TANO RIKIHO,CAMILLE THOM,LINDA VALENTINE,A'CHANNA VALLE,JENNA WOODS	Since there are at Least three alternative routes for this transmission line project we see no reason to disrupt the natural beauty of the Birds of Prey Conservation Area with large, unsightly powerlines. We as the undersigned would prefer alternative #5 as the way for the Gateway West project to be completed in Idaho.	Your support for protecting the NCA is noted.
101595	(i)	LINDA LV	This proposed crossing of the Birds of Prey national conservation area is not in compliance with and do not support the BLM's preferred alternative routes that are in keeping with the 2012 BLM policy manual guiding management of sites within the National Conservation Lands system which prioritizes avoidance and discourages granting rights of way for utility corridors and transportation projects in these areas to the "greatest extent possible." I intend to support the BLM by stating that this area has wonderful values even though it is not pristine throughout, but that either this area remains a National Conservation Area, or it becomes a highly impacted industrialized electrical transmission corridor, sacrificed for convenience. The two are not compatible.	Your opposition to the routes through the NCA is noted.
101596	(i)	JAMES SLEGERS,SLEGERS MARIA A	New proposed routing of Gateway West Transmission Lines thru Birds of Prey is satisfactory ("SEGMENT 8 REVISED PROPOSED ROUTE") Reasons: -Studied comprehensively and recommended by RACK Committee -A voids Private Property almost entirely	Your support for the Segment 8 Revised Proposed Route is noted.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101596	(ii)	JAMES SLEGERS,SLEGERS MARIA A	New proposed routing of Gateway West Transmission Lines is unsatisfactory ("Segment 8G/9K") Reasons: -Studied comprehensively and not recommended by RACK Committee. -Interferes with Private Properties	Your opposition to other routes is noted.
101597	(i)	MAGGIE COLLETT	The Resource Advisory Council spent countless hours drafting their recommendations, after careful study, for Altnerative #1. The farmers and ranchers in Owyhee County, those most affected, were appalled that the BLM in Washington DC did not agree with the Resource Advisory Council's recommendation, but drafted their own Supplemental Environmental Impact Statement which supported Idaho Power and rocky Mountain Power's interest -- not the people who actually live and work in Owyhee County who support Alternative #1.	Your support for Alternative 1 is noted.
101597	(ii)	MAGGIE COLLETT	Alternatives #2 and #5 will have serious negative impact on farmers who will have to move their irrigation systems, and ranchers with livestock concerns.	Your opposition to the other 6 alternatives is noted.
101598	(i)	LONNIE AGNEW,SHERRY AGNEW	New proposed routing of Gateway West Transmission Lines thru Birds of Prey ("SEGMENT 8 REVISED PROPOSED ROUTE") is satisfactory. Reasons: Studied comprehensively and recommended by RACK Committee Avoids Private Property almost entirely	Your support for routes through the SRBOP is noted.
101598	(ii)	LONNIE AGNEW,SHERRY AGNEW	New proposed routing of Gateway West Transmission Lines ("Segment 8G/9K) is unsatisfactory Reasons: Studied comprehensively and not recommended by RACK Committee Interferes with Private Properties	Your opposition to 8G/9K is noted
101599	(i)	JAMES SCHOFIELD	I have a great view to the west of the my house. I see canyons and buttes. The colors and shadows are truly beautiful first thing in the a.m. when the sun first hits. I do not want to look out and see huge towers. I feel that my property value will go down as a result of the proposed location of the transmission line.	Comment noted. Effects on scenery is discussed in Section 3.2 of this SEIS, effects on property values in Section 3.4 of the 2013 FEIS.
101599	(ii)	JAMES SCHOFIELD	Please try to mitigate our concerns by locating the line along Kane Springs Road.	We cannot locate a road with that name.
101600	(i)	TCP INVESTMENTS	New proposed routing of Gateway West Transmission Lines through Birds of Prey ("Segment 8 Revised Proposed Route") is satisfactory. Reasons: o Studied comprehensively and recommended by RACK committee o Avoids Private Property almost entirely	Your support for revised Proposed 8 is noted.
101600	(ii)	TCP INVESTMENTS	New proposed routing of Gateway West Transmission Lines ("Segment 8G/9K) is unsatisfactory. Reasons: o Studied comprehensively and not recommended by RACK Committee. o Interferes with Private Property.	Your opposition to 8G/9K is noted.
101601	(i)	MCPC INVESTMENT	New proposed routing of Gateway West Transmission Lines through Birds of Prey ("Segment 8 Revised Proposed Route") is satisfactory. Reasons: o Studied comprehensively and recommended by RACK committee o Avoids Private Property almost entirely	Your support for revised Proposed 8 is noted.
101601	(ii)	MCPC INVESTMENT	New proposed routing of Gateway West Transmission Lines ("Segment 8G/9K) is unsatisfactory. Reasons: o Studied comprehensively and not recommended by RACK Committee. o Interferes with Private Property.	Your opposition to 8G/9K is noted.
101602	(i)	KEN FRISCH,GARY FRISCH	We are wondering why a line cannot be constructed along the rim of the Snake River Canyon? Has anyone actually visited the Canyon? Have all pictures been taken from satellites or other areal methods	Placing the line along the canyon rim has been considered in the Castleford area of segment 9 and the Guffey Butte area of segment 8. See the FEIS.
101602	(ii)	KEN FRISCH,GARY FRISCH	As for wildlife, since the formation of the Birds of Prey and Celebration Park, there is less wildlife in the area, than before, now answer that.	Refer to Sections 3.10 and 3.11 for a discussion of wildlife and wildlife habitat.
101602	(iii)	KEN FRISCH,GARY FRISCH	Farm land is crossed, a payment is made for that land but over a period of time is that one time payment going to make up for the productivity of that land over a period of time, of course not. Do the power to be really care?	Compensation for easements across private property is determined either by negotiation between the land owner and the proponent or by the state court system, not by BLM.
101602	(iv)	KEN FRISCH,GARY FRISCH	We do not support the proposed routes	Comment noted.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101602	(v)	KEN FRISCH,GARY FRISCH	There is already a line through farm land, disrupting farm fields, yeilds of crops and watering systems. Another line would make things worse. A death of a crop duster has already happened, what would a additional line do?	See Section 3.18 in the 2013 FEIS for a detailed discussion of effects to farmland and farm operations. This was prepared by an agricultural specialist in cooperation with farmers in Power, Twin Falls, and Cassia County (Owyhee County was not involved because the county chose not be a cooperator in the Gateway West EIS). The intent is to avoid impacting pivots during the design phase. Please note that 93 percent of Route 9K through Owyhee County is on federal land.
101603	(i)	PATSY BANNING	Health and safety issues need to be considered. Already many residents living and working around the present power lines here have died of cancer. I believe the power line radiation could be causing the cancer.	As the figures in Section 3.21 show, the electric field falls to background levels at the edge of the ROW. The final transmission line design would avoid placing the ROW across any houses. Please see Section 3.23 of the 2013 FEIS for information on health risks associated with transmission lines. The National Cancer Institute provides the following assessment: "No consistent evidence for an association between any source of non-ionizing EMF and cancer has been found." (http://www.cancer.gov/about-cancer/causes-prevention/risk/radiation/electromagnetic-fields-fact-sheet)
101603	(ii)	PATSY BANNING	Concerns about stray voltage and its impact on [illegible] livestock (particularly dairy cattle) in close proximity to the lines must be noted.	See the analysis of stray voltage and its effects on livestock in Section 3.23 of the 2013 FEIS.
101603	(iii)	PATSY BANNING	It is hard to grasp what an enormous expense and undertaking this power project would cost, not only to build it going down into the valley but crossing over the Snake River and then up the steep terrain and on across to Glenns Ferry where again repeating the same. Compare all that to the proposed and shorter route on the north side of I-84.	Comment noted. See the Proponents' Objectives for the Project in Chapter 1.
101603	(iv)	PATSY BANNING	In summary - the feasible alternative corridor for the Gateway West Transmission Project crossing our beautiful Hagerman Valley must be eliminated from consideration.	Your opposition to a transmission line crossing the Hagerman Valley is noted.
101603	(v)	PATSY BANNING	Besides visual impacts there lines would have for local residents, consider visual impacts on other areas within the corridor like public recreation resources, Billingsley Creek State Park, 1000 Springs Scenic Byway, Idaho Fish and Game's Billinglsey Creek Wildlife, Hagerman Fossil Bed National Monument and the historic trails and roads including the Oregon Trail remnants directly across the Snake River.	Your concern for the visual impact on the Hagerman Fossil Beds NM, parks, and scenic byways is noted. Additional visual studies were completed for the area at the request of the NPS. This information has been added to the FSEIS.
101604	(i)	DONNA BENNETT	1. Segment 9 Revised Proposed Route Alternative 1 will minimally impact existing SageGrouse lek routes in Owyhee County, several of which are within a few miles of the Segment 8 Revised Proposed Route Alternative 2, Sage Grouse will avoid any type of infrastructure, especially the type that is over head, such as the transmission towers because of perching opportunities for avian predators. This is the reason Sage-Grouse leks and nesting areas are located in areas of low sage and no trees.	Your support for Alternative 1 is noted. Your concerns regarding Alternative 2's impact on sage-grouse are noted.
101604	(ii)	DONNA BENNETT	2. Segment 9 Revised Proposed Route- Alternative 1 goes across the Morley Nelson Birds of Prey NCA. This area is hardly void of infrastructure, in fact, this whole area has been used and has had infrastructure, since the early settlers. The early routes from the Grand View area to Boise went out through the heart of the NCA. Old roads leave the canyons and were at that time heavily traveled to the Boise Area. There are currently four transmission lines across this area and one old line that has been decommissioned and is being left for nesting habitat for the birds of prey. An old pole line road, named the Baja Road, which has been recently improved, travels the length of the NCA from Highway 167 to the Swan Falls Road near Kuna. This road could be used in the structure of the new transmission line with minimal impact to the NCA.	Your comments on the existing infrastructure in the NCA are noted. The SEIS identifies the existing transmission lines and roads. The Revised Proposed Route for Segment 9 would use the Baha Road, see the POD Supplement (Appendix B to this SEIS).

Letter and Comment Nos.		Organization/Individual	Comment	Response
101604	(iii)	DONNA BENNETT	I reside just under the rim of the NCA Birds of Prey. Even though the Revised Segment 9 - Alternative 1 would be within eyesight of my residence and the Grand View Valley, I would still prefer to see it in the Morley Nelson Birds of Prey NCA which already has negative visual impact to the public. Revised Segment 9- Alternative 1 is devoid of any negative visual impact. A traveler on Highway 78 has only to look to the Owyhee Mountains and see nothing but nature's view. To spoil this view with huge towers and lines would be a travesty.	Your support for Alternative 1 is noted. Visual impacts are disclosed in Section 3.2, as well as in Appendix G. It is not correct that there would be no visual impacts associated with Alternative 1. Alternative 1 crosses several counties. All alternatives would be visible from numerous points that people live in, travel through, or recreate in. Even if your only concern is Owyhee County, all of the Segment 9 routes would be visible from some points along Highway 78.
101604	(iv)	DONNA BENNETT	Revised Segment 9- Alternative 1 will impact only a few private lands, as opposed to Revised Segment 8- Alternative 2 Those private land holders affected are willing to let the transmission towers go across their lands.	It is not correct that Alternative 1 would only affect a few acres of private land. Alternative 1 would cross approximately 50.5 miles of private land. Alternative 5 would cross the fewest miles of private land of any action alternative, approximately 32.7 miles. Alternative 2 would cross 64.1 miles.
101604	(v)	DONNA BENNETT	Revised Segment 8-Aiternative 2 impacts the private lands of farmers and ranchers the length of the Bruneau, Grand View, Oreana, and Murphy areas. To the casual observer, this seems to be minimal, but to the farmers and ranchers, to have these towers go across their farms is a great disruption of their livelihood. Most of the farms within this route use pivot irrigation, which is not compatable with transmission towers. Most of these pivots are in excess of 1/4 to 1/2 miles in diameter. If a Transmission tower is sited within the circle of a pivot, then the complete pivot system would have to be changed, a great expense to the farmer. The siting of these towers will disrupt the function of these pivots, making irrigation difficult, if not impossible.	Comment noted. The Proponents would work with landowners to avoid impacts to irrigation systems. The intent would be to place towers in areas between pivots and along the edges of fields. Please note that the BLM only choses the line location on federal land. Building the transmission line on private property would require county approval
101605	(i)	TED TALBOTT	The Alternative route near Hagerman and Lower Salmon Dam appears to be a disaster compared to the proposed route. I lived in the Boardman, OR area when high power lines were put in and it was easy to see the flight patterns of geese and ducks changed along the Columbia River. This would surely affect these wild birds in the Hagerman area.	Your concerns on placing the lines in the Hagerman area are noted. We are not aware of any studies concluding that a transmission line alters the migratory paths of water fowl. However, as Section 3.10 discusses, the line can increase mortality form birds flying into the lines. This generally happens on short trips from one habit feature to another rather than in long distance flights where the birds fly at a higher altitude.
101605	(ii)	TED TALBOTT	I believe that the majority of archeological resources in the path of those lines would be harmed greatly. Although some studies concerning this has been done they were only a small "hit and miss" project as to what will be found in the Hagerman Valley. The damage that may be done concerning the historical trails, roads, Native American people, and the beauty of the valley could be enormous.	As discussed in Section 3.3, the analysis is based on a literature review and a partial survey of a 500-foot-wide area along each route on federal lands. Generally, private landowners did not give approval for surveys on their land; therefore, surveys could not be completed on all portions of the routes and not all known sites could be evaluated. A full survey would be completed on the approved route (assuming the project is approved and ROW is granted). Avoidance measures would be implemented during the design phase of the project. The HPTP would be completed following final design to mitigate any impacts to historic properties that could not be avoided following design. Also see Appendix K for a discussion of mitigation for cultural resources not covered by the HPTP process.
101605	(iii)	TED TALBOTT	Please use the Proposed Routes rather than the Alternative 8-A Corridors which may lessen the value of the many good things they have accomplished.	Your support for the proposed routes is noted.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101606	(i)	VERNITA TALBOTT	First of all, in my opinion, it would certainly not be feasible or sensible to construct an expensive line down the steep terrain into the canyon, cross the river, go up the steep hillside to the west side and do the exact same thing to reach Glenns Ferry. The shorter route on the N. side of 1-84, out of the Valley, makes more sense.	Comment noted.
101606	(ii)	VERNITA TALBOTT	At the present time, Hagerman Valley already has more than its share of huge towers and power lines!! Idaho Power recently placed a monstrous, 180" rust colored, power pole near our property that spoils our view. This is along with the already existing sets of tall, silver towers we can see. These towers not only spoil people's view but studies show that magnetic fields are dangerous to people's health.	Your comment that the Hagerman area has several transmission lines that adversely affect scenery in the area is noted. The presence of these lines and their effect on scenery is discussed in Section 3.2. Also see the photo and photo simulations Appendices G and E.
101606	(iii)	VERNITA TALBOTT	Several of our neighbors who lived close to the lines, have died of cancer or Alzheimers disease. One can't help but wonder if the power lines could be the cause.	As the figures in Section 3.21 show, the electric field falls to background levels at the edge of the ROW. The final transmission line design would avoid placing the ROW across any houses. Please see Section 3.23 of the 2013 FEIS for information on health risks associated with transmission lines. The National Cancer Institute provides the following assessment: "No consistent evidence for an association between any source of non-ionizing EMF and cancer has been found." (http://www.cancer.gov/about-cancer/causes-prevention/risk/radiation/electromagnetic-fields-fact-sheet)
101606	(iv)	VERNITA TALBOTT	Many of the residents of the Hagerman Valley are Idaho Power employees, who are a vital part of our community. They surely do not want their homes affected by more towers and power lines. Property values would certainly go down in many areas.	The final transmission line design would avoid placing the ROW across any houses. See the discussion of property value in Section 3.4 of the 2013 FEIS. While there are no local studies on changes in property values following construction of a transmission line, studies in other areas indicate about a 10 percent decrease.
101606	(v)	VERNITA TALBOTT	Finally, the power provided by these transmission lines will be used by people and companies in other areas- no doubt some in CA and Las Vegas. They get all of the benefits while we are left with the RUINATION of our Beautiful Hagerman Valley.	While it is true that people in other areas would benefit for these lines, everyone benefits from reliable energy, which requires a reliable network of transmission lines.
101606	(vi)	VERNITA TALBOTT	Please choose the PROPOSED ROUTE for this segment of the Gateway West Transmission Line.	Your support for the proposed routes is noted.
101607	(i)	KEN STUTZMAN,JILL STUTZMAN	Notice to appeal Hagerman Valley Crossing (8G/8H) (1) Review and reconsider birds of Prey: Eagles at Eagle Tree - Wendell Id: See attachment Pelicans from Lake Walcott California Condors Red Tail Hawks Geese and Ducks (2) Hagerman area should have the same entitlements that the birds of Prey area have as they are the same birds that travel much of Snake River Canyon.	The Hagerman area has many of the same birds as the SRBOP, however, the SRBOP has additional management emphasis on raptors and their habitat because of the law that established the NCA.
101607	(ii)	KEN STUTZMAN,JILL STUTZMAN	(3) Review the negative impact on Electro pulses off power lines that effect humans and wildlife.	Comment noted.
101607	(iii)	KEN STUTZMAN,JILL STUTZMAN	(4) Please do not make the Hagerman Scenic Byway any worse on powerlines that already exist.	As the comment notes, the Hagerman area has several transmission lines, Route 8G involves placing a new line 250 feet north of the existing Summer Lake line.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101608	(i)	LEAH D OSBORN	Commenting on the Draft Supplemental EIS of the Gateway West Transmission Line Project Segments 8 and 9 Routes. Soils 3.15 pages 1-32 The major soil orders on page 3 shows the Oreana /Grandview area all Aridisols. I have attached a description of our local soils as described in the Soil Survey. These local soils are a Bram silt loam and a Typic Torrioethents. These soils make up our "prime farmland". These soils are our best soils. Our only soils that are capable of being tilled, irrigated or grazed. I have attached a emorandum from the Council on Environmental Quality defining Prime and Unique Agricultural Lands just to stress that our farms/our food is very important (if this is not already realized). These soils give us our livelihood, food and the ability to contribute to our local /County economy. No disturbance should occur on or across these soils. No roads, no interference with irrigation systems, No possible negative impacts on the soil microorganisms. Any disturbance is too costly on these delicate Aridisols. Please refer to the below article/data.	Comment noted. See Section 3.15 for measures to avoid and mitigate adverse effects on soils.
101608	(ii)	LEAH D OSBORN	I endorse Alternative 1 of Segment 8/9. I oppose Alternatives 2 through 7. Only Alternative 1 will not have this large of an impact on our soil environment which of course leads to the impact of basic food production. One impact leads to another then another and then another. Negative soil disturbance or decrease in organic matter on our delicate soils leads to a chain reaction of impacts.	Your support for Alternative 1 is noted.
101609	(i)	RAPTOR RESEARCH FOUNDATION,JOAN MORRISON,MIGUEL SAGGESE	We are aware that the alternatives being evaluated in the Draft Supplemental EIS for Segments 8 and 9 the Gateway West transmission project include routes within the Morley Nelson Snake River Birds of Prey National Conservation Area. We would like to make BLM aware of certain relevant facts about raptors and transmission lines. 1. Research data show that properly designed transmission lines can be compatible with nesting raptors (Steenhof et al. 1993, attached). 2. Transmission lines can enhance raptor populations, when properly routed and when nesting structures are placed appropriately. 3. Electrocution mortality is not an issue for raptors on transmission lines due to wire spacing. 4. Collision with transmission lines does not appear to be an issue for birds of prey, possibly because raptors can see and avoid the larger and/or bundled wires used in transmission lines. Recent studies indicate that migrating raptors alter flight elevation to pass safely above or below wires (Luzenski et al. 2016, attached). 5. Transmission lines that can be constructed and maintained from existing roads are less likely to impact vegetation and the prey populations that support raptors. 6. Raptors and ravens that nest or roost on transmission towers are likely to forage several kilometers from the power line (Engel and Young 1992, attached). This could present a risk for prey species whose status is a concern (e.g., sage grouse).	Your comments on raptors is noted. Raptors are one of the resources and values in the NCA that the BLM must manage for.
101609	(ii)	RAPTOR RESEARCH FOUNDATION,JOAN MORRISON,MIGUEL SAGGESE	We are aware that the 1993 legislation that established the NCA defined its purpose to be for the "conservation, protection and enhancement of raptor populations and habitat" while allowing "for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats." It appears that proposed transmission line routes through the NCA are compatible with goals of the legislation. We also are aware that the NCA is in degraded condition due to wildfires and invasive species, and we are optimistic that mitigation and enhancement proposed by the power companies could help to restore the condition of the NCA, while enhancing raptor nesting habitat. We feel this is an opportunity that the BLM should consider strongly. The research that supported and justified establishment of what is now the Morley Nelson Snake River Birds of Prey NCA continues to be recognized internationally as significant, and designation of the area serves as an outstanding example of a science-based decision by BLM. The NCA is one of few protected areas whose boundaries were based on scientific information on the requirements of species it was designed to conserve. We were pleased to learn that "science plays an important role in how the National Landscape Conservation System (NLCS) lands are managed" by BLM, and we are hopeful that the NLCS will continue to use site-specific scientific data in administering the Morley Nelson NCA and other lands under the NLCS purview.	In addition to raptors and their habitat, the legislation also requires the BLM to insure the conservation, protection, and enhancement of the scientific, cultural, and educational resources and values of the public lands in the conservation area.

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101610	(i)	PETER ANDERSON	1) The newer routing of the two-mile wide corridor (35-42 mile posts) would best be moved further north and outside of Patsy Anderson's property so that irrigation or farming practices would not be inhibited or interfered with due to the Transmission Lines placement. 2) By moving the two-mile wide corridor further north, the installation of the towers would be easier to accomplish without having to traverse canyons and undulating land associated with these. Roadway emplacement for access to erect transmission line structures and maintenance and upkeep would be easier and less costly.	The proponents would work with landowners during the design phase to avoid pivot systems to the extent possible. Please note that the county is responsible for permitting transmissions line construction on private land, not the BLM. Also, please note that the 2-mile corridor mentioned in the EIS refers to the original study corridor for the proponents' proposed routes. Only portions of the 250-foot-wide ROW would be affected by construction.
101611	(i)	KATIE FITE, WILDLANDS DEFENSE	3-11-39 (DEIS). The project lumped many sensitive species for analysis. This has been greatly inadequate in addressing impacts, especially when Idaho Power hasn't bothered to conduct site-specific surveys across all potential routes. Species are lumped due to habitat requirements or life history traits. This is nonsense. EACH of these species is a species of concern, and has specific habitat requirements. This appears to be another part of this prolonged Idaho Power project's "Don't Look, Don't Find, Forget About Many Species" superficial and self-serving schemes to avoid honest understanding of the degree and severity of impacts of all potential routes so that a valid comparison can be made. It is biased towards the interests of the proponent who is trying to shove the project onto fragile public lands.	If the Project is approved, site-specific surveys would be completed on the selected route prior to construction that cover all species. Project design would avoid sensitive habitats it the extent practicable. Mitigation would be required for impacts that cannot be avoided. See Appendix K.
101611	(ii)	KATIE FITE, WILDLANDS DEFENSE	This Appendices and Tables must be re-done and detailed baseline surveys, analysis, and mapping occur. Until this happens the significance of the impacts and losses to species and the public lands cannot be understood. The Wildlife portions of the various versions of the EIS referred to Tables buried deep in Appendices – Table D 11-1 and D-11-2. When a reader viewed those Tables –only the most simplistic 1 or 2 sentences of information was found. If species were present, entire segments where found were numbered, with no specificity of any kind on where in the segment they may be found. Thus there was and continues to be no way to possibly understand the impacts of the project, its access roads, and its entire habitat alteration and destruction Footprint on habitats and populations, and how population viability will be impacted.	Including large amounts of detailed information in tables in an appendix is a common practice in an EIS. The text in the main EIS clearly references the appropriate table. The reader can choose to look at the details or only the summary, as they wish.
101611	(iii)	KATIE FITE, WILDLANDS DEFENSE	The project documents have repeatedly stated that "arid landscapes can take many decades to restore". Disturbed salt desert shrub, Wyoming sagebrush, etc. Citations for the tremendous amount of time that disturbance, even under the best of circumstances, will persist must be provided. See Knick and Connelly (2009) Studeis in Avian Biology, also Arkle et al 2013, evaluating failure of BLM rehabs to provide for sensitive species needs. Winter or other habitat avoidance is greatly inadequate. Agencies must apply precautions to all migratory birds and raptors, and sensitive mammal species, too.	The EIS discloses that restoration is difficult in much of the analysis area. Avoidance periods for wildlife are listed in Appendix I of the FEIS. These stipulations are extensive and comprehensive.
101611	(iv)	KATIE FITE, WILDLANDS DEFENSE	PLEASE provide a full and detailed accounting of Gateway development to date – and what protections were applied, when, where, for what native animals and plants, what historical trails, cultural sites, waters, and all other aspects of the environment during construction of the eastern segments of Gateway. Please also provide full and detailed accounting of any waivers that have been granted. This is necessary to understand the cumulative effects and how this segmented project has been carried out to date.	No waivers have been issued and no construction has occurred to date on any portion of the Gateway West Project. Protection for resources are detailed in the EIS, for example see the section on national historic trails in the SEIS (Section 3.1 and Appendix J).
101611	(v)	KATIE FITE, WILDLANDS DEFENSE	Public comment on the EIS had included "Necessary site-specific studies must occur over all potential routes to determine any potential winter habitat, and it must be avoided". Did that take place, and if so, what were the results? This is part of understanding the cumulative effects on all facets of the environment that will also suffer adverse impacts from Gateway West and B2H. The SEIS continues to try to punt to last minute minimal surveys – basically in front of the bulldozers. WHAT have been the results of these surveys in the east? For pygmy rabbits, sage-grouse, loggerhead shrike, etc.?	Detailed surveys of the selected route, if one is approved, would be completed prior to authorizing construction.
101611	(vi)	KATIE FITE, WILDLANDS DEFENSE	ALL project activity must be prohibited during migratory bird nesting season. There must be consideration for migratory birds, including many rare and sensitive species like loggerhead shrike, brewer's sparrow, sage sparrow, and many others. This should extend from mid Feb through July 1, at a minimum.	Any construction activity would comply with the Migratory Bird Habitat Mitigation Plan and other requirements, such as WILD-8 and WILD-9 (see Appendix M).

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101611	(vii)	KATIE FITE, WILDLANDS DEFENSE	There is a great disparity in MFP-RMP ages and thus of BLM consideration of ACEC or other protections for special, unique or rare areas, especially in sagebrush habitats, in a modern day context. As part of this process, full surveys must be conducted, and areas with exceptional value completely avoided, as well as Land Use Plans amended to provide RMP protections such as ACEC status, for example for affected rare plants or a areas of overlap of values jeopardized by development and Gateway (Trails and rare plants, for example).	Revising older land management plans is beyond the scope of this analysis.
101611	(viii)	KATIE FITE, WILDLANDS DEFENSE	The line would increase predation on some vulnerable species. It may be a barrier to movement of others. These effects are compounded by other disturbances in this landscape. It has long been our direct observation that livestock grazing activities significantly increase raven presence – especially during nesting season. Now Coates et al. 2016 have verified this. Example: Jarbidge BLM where extensive supplement feeding is permitted by BLM, and ravens lured to supplements. Dead livestock, afterbirth and other carrion across grazed BLM lands provide abundant food, as well. We have also observed ravens flipping over cattle manure to eat insects underneath. Reduction in grass heights and simplification of sagebrush structure from livestock breaking or eating shrubs also decreases protective cover and makes more vulnerable to predation of al types. So all components of livestock use negatively impact sage-grouse, and are part of the serious direct, indirect and adverse impacts that must be considered. Significant mitigation of all of these effects – not just sticking shiny objects on fences must be undertaken.	The SEIS discloses that increased predation may occur. Revising grazing activities on BLM-managed land is beyond the scope of this project-level analysis.
101611	(ix)	KATIE FITE, WILDLANDS DEFENSE	New or increased access routes would also increase easy livestock movement corridors – resulting in extending intensive disturbances. They would also be predator corridors. The March 2010 Federal Register GRSG Warranted But Precluded Finding laid out the need for consideration of tall structures, road disturbance and many other adverse impacts, as well as all the discussion in many of the chapters in the Knick and Connelly 2009 Studies in Avian Biology.	The SEIS discloses that increased predation may occur. Revising livestock management practices is beyond the scope of this analysis.
101611	(x)	KATIE FITE, WILDLANDS DEFENSE	Full and detailed analysis of the environmental effects and effectiveness of any “mitigation” must be provided. The quality of the habitat altered, lost, or destroyed must be fully considered. The EIS has no basis for a claim that after a hodgepodge of mitigation, the project would be not likely to contribute to a trend toward federal listing or loss of viability for GRSG.	FEIS Appendix C-3 describes the Approach and previous Framework (Section 2.1 and 2.1.1). Section 3.0 provides a brief summary of the HEA, which is the foundation of how greater sage-grouse compensatory mitigation will be determined. For extended documentation on how the HEA functions and provides net conservation gain, see Appendix J (J-2, in particular). The standard of “net conservation gain” as committed to in Management Decision Lands and Realty 12 (MD LR 12) in the Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region (September 2015), has been added to Section 3.11.1.3: “MD LR 12: PHMA (Idaho and Montana) and IHMA (Idaho), and GHMA (Montana only) are designated as avoidance areas for high voltage transmission line and large pipeline ROWs, except for Gateway West and Boardman to Hemingway Transmission Project. All authorizations in these areas, other than the following identified projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in MD SSS 29 and MD SSS 30 of this document. The BLM is currently processing an application for Gateway West and Boardman to Hemingway Transmission Projects and the NEPA review for this project is well underway. Conservation measures for GRSG are being analyzed through the project’s NEPA review

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				process, which should achieve a net conservation benefit for the GRSG." Prior to the sage-grouse listing determination, the BLM, USFWS, and state wildlife agencies collaborated on an evaluation of the entire project's greater sage-grouse effects analysis and mitigation measures via the Conservation Objectives Team report checklist. The checklist highlighted those areas. Although the conservation management standard for greater sage-grouse of "net conservation gain" in PHMA and IHMA from the 2015 land use plan amendments does not apply to the Gateway West Project, the BLM would seek to apply mitigation, including compensatory mitigation, to achieve an overall "net conservation gain" in connection with the Project. These mitigation measures would follow the process set forth in the Greater Sage-Grouse Habitat Mitigation Plan.
101611	(xi)	KATIE FITE, WILDLANDS DEFENSE	For raptors, there was one Map with inadequate info in previous iterations, and this continues in 2016.	Refer to Table D.10-2 in Appendix D for information on known raptor nests.
101611	(xii)	KATIE FITE, WILDLANDS DEFENSE	The visibility of the metal uprights and line will change greatly during different times of day. In morning and/or evening, when light is hitting it at a low angle, highly visible bright reflections may occur that result in high visual disturbance several miles from the line. We have observed this repeatedly with transmission lines, such as the existing line to the east of Salmon Falls Reservoir. We note that the photos used for the KOP in the DEIS showed very significant signs of livestock use and degradation.	The comment is correct that the visibility of towers changes due to time of day and weather conditions. The SEIS discloses that grazing takes place in the project area; see Table 3.18-1.
101611	(xiii)	KATIE FITE, WILDLANDS DEFENSE	The EIS woefully fails to adequately consider and categorize the ecological condition and health of existing understories, the vulnerability of less disturbed sites to weed proliferation when disturbed by Gateway, the harms caused by chronic livestock grazing disturbance, and the difficulties any rehab will face – especially if grazing is continued in pastures/allotments traversed by this line. EIS illustrations of powerline visual effects include large round bare disturbed areas at the base of each transmission tower unit, along with a linear path of disturbance. These areas will be highly vulnerable to weed invasion – and livestock will promote proliferation into surrounding areas. Plus, livestock will concentrate by, rub on, wallow by, and otherwise continue to disturb lands by any posts or tower legs – amplifying weed problems, through disturbance and deposition of weed-promoting manure. This will all increase the risk of flammable weeds, and use of harmful herbicides.	Your comments on grazing and weeds are noted.
101611	(xiv)	KATIE FITE, WILDLANDS DEFENSE	The serious adverse effects of existing impacts and desertification caused by livestock grazing disturbance, including continued chronic disturbance over the life of the line, must be analyzed and mitigated.	Analyzing the effects of grazing on desertification is beyond the scope of this analysis.
101611	(xv)	KATIE FITE, WILDLANDS DEFENSE	We note that altered hydrological processes will also create additional sites for potential West Nile virus mosquitoes, especially when combined with cattle troughs, stock ponds and severely trampled areas surrounding water sources, and other possible West Nile virus-infected mosquito breeding areas.	We are not aware of any evidence that the proposed transmission line would have a significant impact on the occurrence of West Nile Virus.
101611	(xvi)	KATIE FITE, WILDLANDS DEFENSE	Adverse Impacts of Various Seedings, "Treatments", Failures of Fire Rehab Must Be assessed In past decades, federal agencies have spent vast sums of taxpayer dollars destroying woody vegetation to produce livestock forage, or to "treat" lands often under false claims that fire risk might be reduced. All such treated areas must be identified. Large wildfires have burned vast areas of the landscapes, and huge sums have been sunk into rehab. But livestock have been turned out with minimal rest. The vaunted new GRSG amendments fail greatly in providing sufficient rest from grazing to allow native vegetation, soil and soil crust recovery. Exotic forage grasses and the weedy forage kochia have been seeded in many areas – with adverse impacts to sage-grouse, migratory birds and many other wildlife. All of this disturbance must be mapped, analyzed, and impacts assessed as part of the baseline of this process. It is necessary to understand the	Assessing the effects of past seeding practices is beyond the scope of this analysis. The EIS discloses that extensive areas of non-native plants, including plants that contribute to fire spread, are present. The EIS includes measures to avoid addition spread of invasive weeds.

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			relative scarcity of high quality native habitats, difficulties of rehab in any grazed landscape, and to understand how altered and fragmented many areas are. It is also necessary to highlight differences among alternatives. It is also essential to understand how often greatly overstocked lands really are. AUMs in many of the older LUPS - and even continuing to this day – were based on bloated claims of stocking potential. It is necessary to understand the risk of rapid project-caused or other wildfire spread. It has become increasingly clear that the mix of crested wheatgass with cheatgrass in severely grazed interspaces promotes extremely rapid fire spread. For example, in 2010 in the northern Jarbidge, in the area of portions of the Proposed Route segment 9 and alternate, the Long Butte fire burned across nearly 300,000 acres mostly in the course of two days – and 90% or more of the area was crested wheatgrass and various seedings on top of seedings – at times with abundant cheatgrass. BLM refuses to remove crested wheatgrass, as it is used by range staff to claim limited use by livestock. It is largely unpalatable so livestock eat the small native Poa and other grasses, and severely degrade interspaces resulting in blankets of cheatgrass between coarse tall grass. This sets up a disastrous wildfire scenario.	
101611	(xvii)	KATIE FITE, WILDLANDS DEFENSE	All current and adequate rangeland health information for all affected lands must be provided. All permitted use, all actual use over the past 20 years, and summaries of monitoring information on rangeland health must be provided across the all pastures and allotments in the Footprint of the project and alternative routes. This is necessary to understand the baseline, as well as to understand if efforts at rehab may attempt to shift or intensify livestock use in other less used areas of allotments –an action that we strongly oppose. AUM reductions must occur as livestock are pulled back and excluded from pastures crossed by Gateway. Ranchers are unable to graze a significant portion of their AUMs without inflicting very significant damage – so often “actual use” is well below the number of parties allowed on paper.	Acquiring this information, while useful, is beyond the scope of this analysis.
101611	(xviii)	KATIE FITE, WILDLANDS DEFENSE	Detailed overlaying of information is necessary to understand the landscape and environmental context – and severity of impacts – of any route segment. Much of the mapping does not have much of the existing infrastructure shown – so the degree of fragmentation and development cannot be understood.	Showing all infrastructure on a map, or even on several maps, would result in a map or maps that are too busy as to be useful. Appendix D.10 includes 12 tables with fragmentation data.
101611	(xix)	KATIE FITE, WILDLANDS DEFENSE	The mapping of routes is cluttered and difficult to understand. On many Maps, it is impossible to understand where existing transmission lines run. These must be overlaid. In several of the maps, it is hard to understand where the WWEC runs.	The previous comment stated that the maps do not have enough information, this comment states that they have too much information. Both comments are noted.
101611	(xx)	KATIE FITE, WILDLANDS DEFENSE	A modern day consideration of VRM must occur, and any RMP amendments undertaken must upgraded VRM protections to VRM II or I for all intact native vegetation habitats and important wild land areas.	The EIS includes a modern-day VRM analysis completed for the project. See Appendix G and Section 3.2.
101611	(xxi)	KATIE FITE, WILDLANDS DEFENSE	There have not been sufficient alternative routes that follow existing lines considered. Two Gateway lines can parallel each other - separated by a certain “safe” distance, including building a second line if a second line is actually needed) that parallels the energized existing line, and two parallel lines otherwise follows the disturbed lands and other developed areas. It appears that the claim that in a certain part, two lines are needed has really been about opening up a huge swath of sensitive less developed country to all manner of development.	The analysis considered over 50 routes. These are documented in Chapter 2 of the SEIS.
101611	(xxii)	KATIE FITE, WILDLANDS DEFENSE	To what degree would Gateway on the east open this area up to large-scale industrial wind development? What would the serious adverse impacts on sage-grouse, sharp-tailed grouse, pygmy rabbit, migratory birds be? The project also have serious adverse impacts to unburned sagebrush and salt desert shrub habitats, as well as watersheds. There are severe livestock degradation problems as well all along the Owyhee front. Sage-grouse are on the verge of being extirpated over much of this area. The addition of the projects will hasten the demise of this population. Owyhee Front lands pre-Soda Fire were also very important habitat for loggerhead shrike, sage sparrow, and many other rare, declining and sensitive species. Now since the fire, all habitat loss for shrikes and other species in portions of Gateway and B2H has become of even greater concern as such significant habitat has been lost for prolonged periods of time – and given the severely flawed rehab, it is unlikely to recover. Thorough systematic baseline inventories for all these rare and sensitive species must be conducted along alternative routes and the affected blocks of less fragmented habitat that would be chopped apart by this line.	This comment appears to refer to the eastern portion of the Project, which is in Wyoming. This SEIS is not reanalyzing the routes in Wyoming. Decisions on these segments were made in 2013.
101611	(xxiii)	KATIE FITE, WILDLANDS DEFENSE	Please review the work by Chris Wood, Dr. Tom Cade and others on the Owyhee Front shrike populations that now have been severely impacted by the Soda Fire. Low elevation Wyoming big	Comment noted. We will review this work. Table D.6-7 lists recent fires. While it is correct that the

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			sagebrush communities are critical for the loggerhead shrike, a sensitive species, as well as sage sparrow, Brewer's sparrow and others. A nationally significant shrike population has been greatly impacted by the Soda Fire. This makes any remaining shrike habitat impacted by Gateway and B2H even more important and valuable to the species.	Soda Fire did disturb important wildlife habitat, it did not burn areas crossed by the project. A population-wide assessment for all species potentially affected by the transmission lines would beyond the scope of what is required for a project-level EIS.
101611	(xxiv)	KATIE FITE, WILDLANDS DEFENSE	The line will increase wild fire risk. The EIS is greatly deficient in analyzing impacts to a host of sensitive species. Sage-grouse are not a surrogate for sage sparrow, loggerhead shrike, Mojave collared lizard, and other lower elevation Wyoming big sagebrush species, including those that occur at interfaces with salt desert shrub.	Comments on fire and wildlife are noted.
101611	(xxv)	KATIE FITE, WILDLANDS DEFENSE	We request that only routes NORTH of the Snake River be considered as a viable east-west path for this portion of Gateway, if this dinosaur of a project is pushed forward. Why can't there be two new parallel lines set up along the path of the existing lines to the north, and no southern route at all? Separate the lines by whatever distance is necessary (please provide a specific distance and describe why separation is necessary)– but co-locate all new lines in the same area as the bulk of existing lines to the maximum extent possible. We fear that the claim that a split and two new routes were needed in places is "cover" for opening up the South Hills, and portions of the Jarbidge lands or lands south of Bruneau to extensive new development.	Your preference for the northern routes is noted.
101611	(xxvi)	KATIE FITE, WILDLANDS DEFENSE	In the broader landscape, the Plans must be amended to require quarantining of livestock moving from a weed-infested area onto any native vegetation sites for a suitable period of time for weed seeds to pass through animals, and cessation of grazing disturbance on lands until infestations are controlled. We are greatly concerned about the amount of herbicide and the types of herbicide that may be used. Instead of reliance on the spray and walk away approach, full and integrated IPM must take place. There is significant potential for soil contamination, drift including on windblown eroded soils, and many other problems with herbicide use. A solid protocol for effective treatment – including preventive actions and prudent post-rehab controls grounded in IPM must be established.	Amending existing management plans to change livestock use is beyond the scope of this project.
101611	(xxvii)	KATIE FITE, WILDLANDS DEFENSE	We stress that there are no adequate protections provided here for prevention of excessive soil erosion, loss of microbiotic crusts, and many other adverse impacts of gateway.	The EIS includes several environmental protection measures to protect and/or rehab soils.
101611	(xxviii)	KATIE FITE, WILDLANDS DEFENSE	BLM's Herbicide EIS and step down analyses are deeply flawed. They cannot be used as the basis for widespread application of herbicides here. Full adverse impacts of a battery of chemicals used in pygmy rabbit habitat, or spotted frog habitat, or sage-grouse nesting habitat, for example, have not been adequately examined. Rabbits may be exposed to chemicals while they are being applied, in soils in burrows, and on vegetation consumed. Just how much herbicide, and what type, will be applied in association with any part of this project? Will sprayed dead zones be used around facilities?	Revising the BLM Herbicide EIS is beyond the scope of this analysis.
101611	(xxix)	KATIE FITE, WILDLANDS DEFENSE	One of the concerns with routing of this line in these areas is that is likely to set a precedent for all manner of energy lines, such as gas pipelines to occur in the future if the RMPs are amended and Idaho Power is allowed to carve a brand new route with this line. Once the RMPs are changed and amended to accommodate Gateway, OTHER electrical lines, gas pipelines, and developments will follow. None of the mapping shows all the access routes. So how can the impacts – including such impacts as downstream sedimentation, really be understood, analyzed, and mitigated? Transmission line wires must be prominently marked to maximize visibility and reduce avian collisions. Visual analyses must be conducted using such marking. Any cell or other towers linked to this line must be "bundled" with other sites, and night lighting hazards minimized. Night lights, especially under cloudy conditions, appear to draw migrating birds in – and they are killed by collisions with wires or tower structures. This is also a concern with the various transformer and other sites associated with this line. "Bundling" of ANY such developments with other night sky light polluters must occur.	The possibility that other utility lines may be built is disclosed in the SEIS. See Chapter 4.
101611	(xxx)	KATIE FITE, WILDLANDS DEFENSE	The SEIS refers back to the preceding segmented Gateway process for its wildlife and migratory bird analyses. This is a serious concern, because it shows BLM has let Idaho Power continue to ignore addressing long-standing public input.	The sage-grouse analysis covered all segments of the project, as did the migratory bird habitat management plan. The BLM, the USFWS, and other state and federal agencies will continue to review these plans and may make additional changes based on the alternative selected (if any) and the final design.

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101611	(xxxi)	KATIE FITE, WILDLANDS DEFENSE	Vegetation. The vegetation areas impacted in Table 3.6-1 and others are much too limited. The potential for invasive species, fires, etc. are not considered. The effects of fragmentation on making plant communities more susceptible to exotic weed infestation must also be assessed. So must the effects on native biota that inhabit these communities.	Refer to the tables in Appendix D for additional information on vegetation, fragmentation, and fires.
101611	(xxxii)	KATIE FITE, WILDLANDS DEFENSE	The average cost of restoration per acre is given as $1800. The Restoration proposal does not take into account: site variability, the relative scarcity of mature and old growth sage or other vegetation vs. younger age class vegetation or shrubs like rabbitbrush, or the reality that continued grazing impacts will chomp and stomp any restoration away over time, and/or prevent its 'success" in the first place. In this highly fragmented landscape, even small pockets of sage or shrubs are very important, yet specific surveys for such ecological characteristics and the animals actually inhabiting the lands do not seem to have taken place.	This is the Proponents' estimate. The BLM is not using this figure to estimate mitigation requirements.
101611	(xxxiii)	KATIE FITE, WILDLANDS DEFENSE	The analysis in the SEIS greatly fails to provide informed understanding of the quality and quantity of vegetation communities to be altered, fragmented, and destroyed. It also greatly fails to assess the impacts on microbiotic crusts (a frontline against weed invasion), and adequately soils and potential for erosion in wind and water, and other basic elements of the environment.	We do not agree. The 2013 FEIS and this SEIS include extensive information on vegetation communities, including the tables in Appendix D.6.
101611	(xxxiv)	KATIE FITE, WILDLANDS DEFENSE	The SEIS refers to effects to individuals and populations, changes in habitat for TES species, potential for spread of Noxious weeds (why not ALL exotic species like cheat, medusahead, Vulpia, bur buttercup)?, and altered hydrology. Yet the EPM methods in Table 2.7-1 do not adequately avoid or minimize the impacts. The conclusion (3.7-9) that "the implantation of EPMs could affect individuals but is not likely to contribute towards a trend toward federal listing" is not warranted. What is the quality of the habitat known to date? The CCAA is very inadequate to control construction practices and to protect populations over time. Where are the years of surveys needed to detect LEPA along and in the landscape surrounding all routes? Where are surveys for all the sensitive plants? The SEIS uses the word "could" and does not seem to even have conducted necessary baseline site-specific intensive surveys in spring. We oppose amendments to the SRBOPA RMP. The SEIS shows: Revised segment 8 crosses .3 miles of known occurrences, 18.7 miles of potential habitat, 0.8 miles of proposed critical habitat, and 9 would also have impacts to habitats. Table 3.7-2 lists many other jeopardized sensitive plant species. The conclusion that "the Project would not preclude BLM from meeting the SRBOP's goal of emphasizing maintenance, protection, enhancement and restoration of sensitive plant habitats" is not warranted or valid. It does not adequately deal with indirect and cumulative effects.	Your comment on the need to collect baseline information is noted. The determination of whether the Project would lead to listing will be made by the USFWS.

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101611	(xxxv)	KATIE FITE, WILDLANDS DEFENSE	We strongly agree with BLM that there are "multiple factors that proponents' habitat restoration proposal does not take into consideration" --- past and ongoing disturbance regimes of the area, the composition of the landscape and vegetation communities; the composition of adjacent areas; and the realization that the restoration actions need to be adapted to respond to site specific conditions. This also includes the variability in site-specific conditions, past or ongoing disturbance regimes, drought, fire frequencies (including as increased by Gateway), etc. Idaho Power assumes a shocking 80% success rate for restoration. We agree: "Because the Proponents' proposal 1) does not take into consideration the disturbance legacy of affected or proposed treatment areas; 2) does not provide sufficient information regarding the baseline conditions or the methods that would be implemented to restore target areas; and 3) overestimates the potential success rate that would likely be achieved in these areas, it is not likely that the habitat restoration efforts proposed in the MEP would result in enhancement of the SRBOP. The efforts necessary to treat areas dominated by invasive plant species (e.g., clearing of vegetation, and mechanical or chemical treatment of weeds) have the potential to impact individuals of TES plant species (if present) and habitat (e.g., potential of herbicide drift into adjacent vegetation communities). If the restoration efforts were successful, they would potentially have long-term beneficial effects (e.g., restoration of TES plant habitat and a possible localized reduction of fire risk); however, as discussed above, restoration success is likely to be low or very limited in extent without implementation of adequate fire protection/reduction efforts coupled with an adaptive management approach to the success criteria (i.e., as opposed to tying the financial support to an assumption of an 80 percent success rate; see Williams et al. 2009). Therefore, the proposed habitat restoration efforts in the Proponents' proposal would potentially have short-term adverse impacts to TES plant species and habitat, but may have few to no long-term effects (adverse or beneficial) …".	Your comments on the MEP are noted. Refer to Appendix K in this FSEIS for additional information on mitigation.
101611	(xxxvi)	KATIE FITE, WILDLANDS DEFENSE	Why has this SEIS even been released with this unscientific, shoddy and self-serving invalid EPM? Locations of structures promised to be removed as "mitigation" are not even known.	The SEIS includes a high-quality analysis of the resources and the likely project effects. The transmission lines to be removed are discussed in Chapter 2 and the impacts from removing them are disclosed in the appropriate sections of Chapter 3.
101611	(xxxvii)	KATIE FITE, WILDLANDS DEFENSE	BLM proposes habitat/veg restoration, potential fuelbreaks (fuelbreaks as they have been developed by BLM in the past have not been effective and/or have relied on weedy cattle forage species). We oppose any claims that fuelbreaks or funding for fuelbreaks may be "mitigation". "Mitigation" should not involve paying for BLM to do more analyses.	Please see the protection measures for fuel break construction in Appendix K of this FSEIS.
101611	(xxxviii)	KATIE FITE, WILDLANDS DEFENSE	Invasive plant species: We are concerned that the "invasive plant species" section focuses overwhelmingly on noxious weeds, and not ecosystem-dooming flammable invasive exotic grasses.	The EIS includes measures to control the spread of all weed species, including grasses and aquatic species. See Appendix M and Section 3.8 in this document.
101611	(xxxix)	KATIE FITE, WILDLANDS DEFENSE	"Furthermore, as some restoration efforts contain a disturbance component (e.g., during the clearing of existing vegetation), the restoration efforts, if not implemented correctly or successfully, could increase the rate of invasive plant spread due to the increased ground disturbance involved; however, this is uncertain as the Proponents have yet to identify what methods would be used during their proposed restoration mitigation/enhancement". Again, WHY has a SEIS been released with this much uncertainty?	The BLM agrees that restoration treatments need to be implemented carefully. The Proponents would implement treatments using methods approved by the BLM on federal lands. Counties and the State would set requirements for private and state lands, respectively.
101611	(xl)	KATIE FITE, WILDLANDS DEFENSE	There is no mapping of areas surveyed, rare plants detected, the locations and status rare plants in the surrounding landscape, and much other information necessary for informed analysis and alternatives development.	Mapping every location with a rare plant for hundreds of miles of proposed and alternative routes would be very difficult, as well as pointless given the scale of the maps needed to portray the scope of the project. Full botanical surveys would be completed on the selected routes, if the project is approved. The proponents would be required to avoid rare plant locations during final design to the extent practicable. See EPMs OM-22, -24, -25; TESPL-1 through 7; and other measures listed in Appendix M and Section 3.7 of this document.

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101611	(xli)	KATIE FITE, WILDLANDS DEFENSE	Issues described in Section 3.10.1.2 are not adequately assessed, including: Avoidance, migratory bird effects, loss or fragmentation of wildlife habitat, potential for disruption of breeding and reproductive activities of raptors, big game migration and crucial ranges, parturition areas, avian collision risk, noise during construction, electrocution, wildlife habitat area impacts. Did the analysis only use the data in a GIS database, and not thorough and systematic on the ground surveys during the appropriate season of the year? The habitat types for analysis are much too simplistic.	These issues, including avoidance, migratory birds, and habitat fragmentation, are fully addressed in the FEIS and supplemented as appropriate in the DSEIS. For example, see the 12 tables disclosing fragmentation in Appendix D-10.
101611	(xlii)	KATIE FITE, WILDLANDS DEFENSE	The "summary" of construction impacts to wildlife lumps all kinds of raptors together. It ignores migratory birds, and non-big game animals. We are concerned it only refers to pronghorn habitats as "winter range", ignoring the importance of other habitats and pronghorn as important watchable wildlife in this landscape.	While the summary discusses raptors in general, the tables in Appendix D identify individual species. Please review the information it these tables.
101611	(xliii)	KATIE FITE, WILDLANDS DEFENSE	BLM uses "compensatory mitigation categories" and lists the sage-grouse mitigation plan. Much of the vaunted sage-grouse "mitigation" is controversial. It is a distraction from taking better care of existing habitats - for example, through preventing their expanded fragmentation with powerline projects or allowing their continued downward ecological spiral due to livestock grazing disturbance. It often unfortunately involves destruction of habitat for migratory birds and other species – for example juniper removal, and often "sagebrush restoration and enhancement" projects which may thin, kill, alter, and harm sagebrush habitats and make them more susceptible to cheatgrass and other weeds.	The proposed mitigation for Gateway West was developed in cooperation with the USFWS and State agencies, using a science-based HEA. See Appendix J in the FEIS.
101611	(xliv)	KATIE FITE, WILDLANDS DEFENSE	SEIS 3-10-38 states that the old seriously flawed and minimal migratory bird habitat plan outlined mitigation for habitats not already covered by sage-grouse. It is unclear how the SEIS deals with non-sage-grouse non-treed habitats. Disregarding the importance of native shrubs like greasewood and other habitats that are important for some imperiled migratory bird species (loggerhead shrike, depending on height sage sparrow) is not acceptable. BLM refers to Appendix K, referencing the SRBOPA (discussed below).	The BLM believes that the extensive mitigation proposed for sage-grouse habitat will also benefit other species using non-tree habitats.
101611	(xlv)	KATIE FITE, WILDLANDS DEFENSE	We agree: "The lack of details or specifics in the MEP makes it unclear how the proposal's goals would be achieved. Most importantly, the MEP does not contain a methodology and a reliable, consistent, and repeatable accounting system to determine the expected impacts of actions and the measures necessary to compensate for those impacts based on a common "currency" (i.e., raptor habitat value per acre). Therefore, it is not adequate in the form submitted as part of the Revised Plan of Development for the Project".	Please see the revised mitigation framework in Appendix K of the FSEIS.
101611	(xlvi)	KATIE FITE, WILDLANDS DEFENSE	The vegetation community type's value to raptors actually depends on the species of raptor (Table 1, K-3), so this generalization is not applicable to all species.	Raptor habitat varies to some degree by species; however, the impacts identified in the EIS, e.g., collisions, electrocution, disturbance due to noise and fugitive dust, visual disturbance, and disturbance during nesting, are valid for all raptors.
101611	(xlvii)	KATIE FITE, WILDLANDS DEFENSE	We are greatly concerned that BLM is trying to fold its controversial FIAT scheme into "Mitigation" for Gateway. See for example, WLD Soda Fire Rehab Comments, Appeal of "Emergency" Fuelbreaks DR. These controversial weed-infested, heavily herbicide intensive and/or severely grazed areas have not undergone NEPA review.	Please see the discussion of fuel breaks in Appendix K of this document. Measures to avoid the spread of weeds are included in the proposed mitigation.

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101611	(xlviii)	KATIE FITE, WILDLANDS DEFENSE	K-4 states: Siting Compensatory Mitigation "Habitat restoration treatments would primarily be conducted within MA 1 because the RMP identifies this area as having the highest probability of restoration success (BLM 2008). The method assumes that the EP of an area is specific to the Ecological Site Descriptions (ESDs) of the vegetation community … In addition, habitat restoration treatments would be located within fuel break compartments that contain a gradient of the raptor habitat condition classes described in Table 1. Fuel breaks will compartmentalize habitat restoration areas to provide durability for treatments .... It should be noted that, depending on initial condition class, it may take multiple treatments to achieve DFC for raptor habitat …". This fuelbreak scheme has not undergone NEPA, and should not be part of any "mitigation" for Gateway. See WLD Soda DR comments and Appeal, including discussion of "FIAT". BLM claims there will be "Durable" fuelbreaks. These are likely to cause new and expanded habitat fragmentation, extensive potential wed infestation and heavy to severe livestock use areas, heavy herbicide use areas including drift-prone chemical herbicide, and great potential for large-scale infestation of the landscape with exotic weedy aggressive species that choke out and out-compete native vegetation and essential habitat components for native biota – ranging from LEPA and LEPA pollinators to shrubs required by loggerhead shrike for nesting. The full cumulative effects of this scheme across the region in radically degrading the quality of habitats, open space, science vistas, etc. have never been assessed.	Your comments on mitigation and fuel breaks are noted. Appendix K in this document describes a framework for mitigation. Detailed planning would be completed prior to implementation. Ground-disturbing activities would undergo NEPA analysis prior to implementation.
101611	(xlix)	KATIE FITE, WILDLANDS DEFENSE	The BM"s SRBOPA mitigation model is also deeply flawed. It should be immediately scrapped. It does not address the context in the landscape of the project disturbance, or indirect and cumulative impacts. For example, any habitats closer to nesting sites may be of MORE value than distant habitats – because less energy and time would be expended by parent birds in foraging and providing food for young. BLM wrongly claims: "This model establishes a logical and transparent approach to assessing baseline conditions as they apply to raptor habitat within the finite area of the SRBOP and provides a simple method for calculating the mitigation required to achieve a return to or exceedance of baseline raptor habitat conditions in the SRBOP, using flexible habitat restoration treatments". This may be logical to someone sitting inside a cubicle ignoring biological values in the field, but it sure is not "logical" to expect the natural world, especially in the SRBOPA landscape, to respond in such a predictable manner to supposed rehab efforts. Further, the model does not factor the serious adverse effects of livestock grazing disturbance into its calculations, and so is divorced from public lands reality, rationality, and ecological science. See Fleischner 1994, Belksy and Gelbard (2000) for example.	Your comments on the model are noted. See the above response.
101611	(l)	KATIE FITE, WILDLANDS DEFENSE	The sage-grouse habitat plan does not adequately compensate for impacts to sage habitats. It also contains measures that are claimed to benefit grouse, but not habitats for other species, and may actually harm habitats for important and sensitive migratory bird and raptor species in other habitats (such as throwing vast sums at radical juniper deforestation schemes and claiming they are "mitigation"). It sacrifices other habitats in order to claim "mitigation" is taking place for grouse (juniper).	The compensatory mitigation plan for sage-grouse includes measures designed to improve habitat for all shrub land and grassland species. As discussed in response to your previous comments, it was developed using an HEA, a detailed science-based analysis of all sage-grouse habitat. Field surveys found that ravens were the main species nesting in junipers, a species which preys on sage-grouse eggs and chicks. In places where juniper is encroaching on historic sage-grouse habitat, the plan calls for its removal.
101611	(li)	KATIE FITE, WILDLANDS DEFENSE	We strongly disagree that the 2013 FEIS wildlife analysis was adequate. BLM received extensive public comments describing numerous flaws and shortcomings, and Appeals, which have been ignored in the SEIS. BLM sensitive species listed include: Cassin's finch, golden eagle, green-tailed towhee, pinyon jay, numerous bats and others. This list does not include those already on the list in 2013, i.e. Brewer's sparrow, sage sparrow, loggerhead shrike and many others. This further demonstrates how inadequate the SEIS is, in that it even tries to slit species off.	Your comments on the 2013 FEIS are notes. We disagree with the assertion that the analysis was not adequate.
101611	(lii)	KATIE FITE, WILDLANDS DEFENSE	We are very concerned about the segregation of sage-grouse habitat into an endless series of habitat categories, with each new segregation reducing the amount considered to be of most importance. 3.11.3. 3.11.4 contains an incomprehensible paragraph on sage-grouse and alternatives. We disagree that quantitative impacts can be determined by summing the artificial and biased "impact values reported along this portion of the project". Without valid baseline ecological data, the model outputs become even	Your comments on sage-grouse management are noted. The BLM recently approved amendments for land management plans in the Great Basin for sage-grouse management. The SEIS includes the categories identified in that document. The SEIS

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			more flawed.	also analyzes impacts to all sage-grouse habitat regardless of the category. See the tables in Appendix D (D.11-1 through D.11-17).
101611	(liii)	KATIE FITE, WILDLANDS DEFENSE	We are very concerned about the discussion of TES habitats, and modeling. If habitats are “capable” of supporting a species, but do not support that species, what is the reason? See Dobkin and Sauder 2004, for example. WHY are there no pygmy rabbits across vast areas modeled as pygmy rabbit habitat, for example? WHAT degradation or disturbance is responsible/? Where were site specific surveys conducted to detect species occupancy and use of habitats? This is essential, including for understanding the relative scarcity of habitats and gauging the magnitude of effects.	As noted in response to your previous comment, site-specific surveys would be completed on the selected route, if the project is approved, prior to construction. Project design would avoid sensitive habitats it the extent practicable. Mitigation would be required for impacts that cannot be avoided or minimized. See Appendix K.
101611	(liv)	KATIE FITE, WILDLANDS DEFENSE	3-11-5 claims there will be no impacts from LUP amendments to wildlife as none are specifically related to wildlife. This is absurd, as the amendments will allow the line to tear apart and fragment habitats for sensitive species and migratory birds in locations that otherwise would be secure habitat.	The text actually reads: "The effects described for areas requiring an amendment in order for the Project to be built would only occur if the amendment were approved, and amendments that alter land management designations could change future use of these areas. However, no amendments specific to TES wildlife or fish species are proposed for the Project, and no impacts to TES wildlife and fish resulting from approving the amendments, beyond those described for the general impacts of the Project, are anticipated."
101611	(lv)	KATIE FITE, WILDLANDS DEFENSE	RE: the lumped Vegetation Communities used in the model and analysis. These “habitat types are ubiquitous and abundant within the Analysis Area and region”. These are not habitat types, just lumped categories for a model.	We disagree with the comment that vegetative communities are just lumped categories for a model. There are hundreds of plant species in the project area, analyzing effects to each individual species is not feasible. Grouping plants into communities is a practical and commonly applied way of analyzing vegetation and the habitat the vegetation community provides.
101611	(lvi)	KATIE FITE, WILDLANDS DEFENSE	Pages 3.11-114 through 3.11-126 of the FEIS list the general impacts that would occur to TES species that have not had specific quantitative impact parameters established. Tables D.6-2 and D.6-3 in Appendix D list the acres of impact that would occur to the various habitat types found along Segment 8 (i.e., in habitats where these TES species could occur), while Tables D.11-1 and D.11-2 provide the general habitat type that each TES species generally occupies. WHAT about Brewer's sparrow, loggerhead shrike, sage sparrow, etc.? THIS is entirely unacceptable to just look at some species - larger or more glamorous ones, and not others, as is done here: if the TES species where quantitative species-specific data/parameters are available, the bald eagle, burrowing owl, Columbia spotted frog, sage-grouse, northern leopard frog, pygmy rabbit, and the yellow-billed cuckoo could occur along the Revised Proposed Route for Segment 8. In addition, the four listed aquatic invertebrate species (i.e., the Banbury Springs limpet, Bliss Rapids snail, Bruneau hot springsnail, and Snake River physa snail) could also occur along the Revised Proposed Route for Segment 8. The Revised Proposed Route for Segment 8 would cross 2 miles of habitat within 1 mile of bald eagle nests (Table D.11-4), and would result in 40 acres of construction impacts and 4 acres of operations impacts within this area (Tables D.11-6 and D.11-8). It would also cross 109.4 miles of burrowing owl habitat (with 1,936 acres of construction impacts and 191 acres of operations impacts), less than 1 mile of Columbia spotted frog habitat (with 3 acres of construction and no operations impacts), 71.9 miles of sage- grouse habitat (with 1,259 acres of construction impacts and 140 acres of operations impacts), 1.2 miles of northern leopard frog habitat (with 23 acres of construction impacts and 3 acres of operations impacts), 108.2 miles of pygmy rabbit habitat (with 1,920 acres of construction impacts and 188 acres of operations impacts), and less than 1 mile of yellow-billed cuckoo habitat (with 2 acres of construction and operations impacts; see Tables D.11-3 through D.11-8).	We believe that the analyses in the EIS and the Project BA meet all requirements. We note that the USFWS issued a BO for the Project, which indicates that the analysis was adequate.

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101611	(lvii)	KATIE FITE, WILDLANDS DEFENSE	Why isn't the occurrence verified, and full surveys conducted across the landscape so the project habitat fragmentation and loss can be placed in context?	As noted in response to your previous comment, site-specific surveys would be completed on the selected route, if the project is approved, prior to construction. Project design would avoid sensitive habitats it the extent practicable. Mitigation would be required for impacts that cannot be avoided or minimized. See Appendix K.
101611	(lviii)	KATIE FITE, WILDLANDS DEFENSE	This is a major concern: The Revised Proposed Route's centerline for Segment 8 would pass within 1 mile of a single sage-grouse lek4 that has an undetermined management status. This value increases to 7 leks with either an occupied5 or undetermined status when considering a distance of 4 miles from the Project's centerline (with 5 of these leks located on federally managed lands), and 54 leks when considering a distance of 11 miles (with 45 of these leks located on federally managed lands; see Table D.11-9). This is not adequate, as the leks near the northern portion of Jarbidge and Bruneau-Owyhee country are already typically very low in bird numbers, habitats have been seriously altered and fragmented, and persistence is a major concern.	Your concern is noted.
101611	(lix)	KATIE FITE, WILDLANDS DEFENSE	The SEIS largely ignores impacts of herbicides and other toxics, on rare Snake River aquatic biota in including several snails.	See REC-6 in Appendix M.
101611	(lx)	KATIE FITE, WILDLANDS DEFENSE	The analysis deals mostly with "direct" impacts: As shown in Tables D.11-5 and D.11-6, the Revised Proposed Route for Segment 8 would result in impacts on BLM managed lands within the SRBOP to habitats for the burrowing owl (260 acres during construction), sage-grouse (109 acres during construction), and pygmy rabbit (260 acres during construction). WHAT is the basis for the "quantitative species-specific data/parameters" and the availability of data?	The analysis considers direct, indirect and cumulative effects. The BLM is correctly working with the Proponents to develop mitigation. The data source has been added to the tables in Appendix D in the FSEIS.
101611	(lxi)	KATIE FITE, WILDLANDS DEFENSE	The SEIS contains many of the same old greatly inadequate wildlife measures as earlier Gateway documents. It is full of loopholes and waivers that render any claimed promises of protection invalid. For example, The following measures, which were identified in Table 2.7-1 of the FEIS, are directly related to general wildlife and fish species and would be applicable to Segments 8 and 9: 1. WILD-1 Requests for exceptions from closure periods and areas will be submitted by the Proponents to the appropriate BLM Field Office in which the exception is requested through the Environmental CIC. Established exception processes on BLM-managed lands will be followed … 3-10-27 and elsewhere. Flight diverters must be installed on ALL transmission wires, not only where the lines cross rivers. This is especially the case since Idaho Power has woefully failed to conduct surveys on bird migratory routes and use patterns across the Gateway and B2H landscapes. As migration patterns may change from year to year, multiple years of data must be obtained.	Your comments that the same measures are included in the SEIS as are included in the FEIS is correct. This is a supplement to the 2013 FEIS, not a revision. We do not agree that they are inadequate.
101611	(lxii)	KATIE FITE, WILDLANDS DEFENSE	THIS is an example of how minimal avoidance and mitigation is. It guarantees extensive "take" of migratory birds – horned lark, meadowlark, long billed curlew, sage sparrow, raptors, etc.: 6. WILD-9 To the extent feasible, all vegetation clearing will be conducted to avoid the avian breeding season (generally April 15 through July 31, depending on local conditions and federal land management plan requirements) in order to minimize impacts to migratory birds. HOW could BLM Possibly let Idaho Power get away with publishing a SEIS wit such a greatly inadequate migratory bird nesting avoidance period? THIS avoidance is also minimal, and greatly inadequate: WILD-11 Any areas that may require blasting will be identified and a blasting plan will be submitted to the appropriate agency for approval. Blasting within 0.25 mile of a known sensitive wildlife resource will require review and approval by the appropriate agency. This distance must be much greater, and the needs of individual species must be taken into account.	We believe that these measures are appropriate for the project.

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101611	(lxiii)	KATIE FITE, WILDLANDS DEFENSE	The FEIS refers to BLM Compensatory Mitigation Categories: In addition to the design features and EPMs meant to avoid and minimize impacts to TES wildlife and fish species as well as their habitats (as described above), two mitigation plans were required by the ROD for Segments 1–7 and 10 to compensate and mitigate for the impacts to wildlife/fish species and their habitats that would remain once the avoidance and minimization measures were fully implemented. These include the 1) Greater Sage-Grouse Habitat Mitigation Plan and 2) the Migratory Bird Habitat Mitigation Plan. These plans would be applicable to Segments 8 and 9, if these segments are approved. These plans are greatly inadequate, as has been described in public comment and Appeals of the eastern segments of Gateway. We incorporate this by reference into our comments here.	See the response to your similar comments above.
101611	(lxiv)	KATIE FITE, WILDLANDS DEFENSE	The FEIS also refers to: "the HEA that was conducted in order to quantify the habitat services lost due to project related impacts and the potential habitat service gains that could be achieved by various mitigation programs; and 3) the Proponents' proposed mitigation plan to compensate for impacts to sage-grouse as well as sagebrush habitats. The types of mitigation projects and efforts that would be implemented as part of this plan include: 1) fence marking and removal; 2) sagebrush restoration and enhancement; 3) juniper removal; 4) seeding of forb and bunchgrass understory; and 5) the purchase of conservation easements". This, in fact, has the potential to add to the current catastrophic loss of breeding, nesting, brood rearing and wintering habitats for migratory birds, raptors (ferruginous hawk, American kestrel, northern goshawk, flammulated owl, others) in arid forest pinyon-juniper and juniper ecosystems across the West". Elements of the proposed mitigation are likely to make matters much worse for several species of raptors and many other native animals, as well as public lands recreationalists. Mitigation actions may increase fire risk and threat by "converting" a fire-resistant site (juniper) to a site which is hotter, drier, windier and burns more frequently. There is grave risk of cheatgrass and now medusahead infestation with the rampant deforestation, fuelbreak and other veg manipulation schemes BLM and other federal agencies are undertaking. See Jones et al. 2013 review of agency veg treatments, Connelly et al. 2013 Getting Nowhere Fast. Matters now may be much worse than with the studies reviewed in Jones et al. 2013, given the advance of medusahead in SW Idaho and the expanded cheatgrass and medusahead that BLM's veg treatments are spawning across the region. Throwing funds at law enforcement and PSAs is not appropriate mitigation, and is not "durable".	See the response to your comment on sage-grouse mitigation above.
101611	(lxv)	KATIE FITE, WILDLANDS DEFENSE	The mitigation and avoidance for migratory birds is shockingly deficient. There is a significant net loss of habitat, and construction destruction would be allowed during nesting season to a significant degree. Gateway likely enhances habitat for predators of songbirds.	See the response to your comment on mitigation above.
101611	(lxvi)	KATIE FITE, WILDLANDS DEFENSE	For all wildlife and TES species, impacts to the NCA will not have been avoided to the greatest extent possible, and the net benefit of the enhancement activities is not proven.	Only the no action alternative completely avoids the NCA. Alternative routes avoid impacts to different degrees. Project design would limit site-specific impacts to the extent practicable. See Appendix K for the proposed mitigation framework for compensatory mitigation for unavoidable impacts.
101611	(lxvii)	KATIE FITE, WILDLANDS DEFENSE	We are very concerned that the geological hazards information is not complete. As an example, the eastern segment of Gateway had to be moved in places due to "geological hazards" that Idaho Power ignored looking for in advance– prompting at least one neighbor to appeal.	The EIS discloses that the line would be adjusted to avoid impacts during the design phase. Until a final route is selected and final design is completed, it is not possible to identify all possible hazards.
101611	(lxviii)	KATIE FITE, WILDLANDS DEFENSE	The SEIS continues to ignore the effects of disturbance on microbiotic crusts. The SEIS ignores the serious adverse direct, indirect and cumulative effects of livestock grazing disturbance, BLM projects like fuelbreaks, and other disturbances in promoting soil erosion and flammable invasive weeds.	As noted in the response to several previous comments, revising grazing standards is beyond the scope of this EIS. The Project includes EPMs to reduce other effects. It is correct that all soil impacts cannot be avoided. The EIS discloses this and includes EPM to restore disturbed soils to the extent possible.

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101611	(lxix)	KATIE FITE, WILDLANDS DEFENSE	The SEIS states: Of the 204 stream crossings for the Revised Proposed Route for Segment 8, 63 percent are non-listed ephemeral streams and there are 13 TMDL or 303(d) listed streams for sediment (Table D.16-6 in Appendix D). The Analysis Area for the Segment 8 Revised Proposed Route includes 13 stream segments that are TMDL or 303(d) listed streams for sediment and 5 stream segments that are TMDL or 303(d) listed streams for temperature (Table D.16-13 in Appendix D). There is no analysis of the magnitude of degraded ecological conditions in these drainages and watersheds, the effects of land uses, how little progress has been made with addressing water quality or if water quality has worsened – or in regards to cumulative effects on both BLM and private or other lands. The levels of pollution in these drainages, and the waters that they are tributary to them, must be studied. For example, is the drainage grossly trampled by cattle and polluted with manure? How will project erosion and sediment compound such pollution and water quality issues?	These studies are beyond the scope of this project EIS.
101611	(lxx)	KATIE FITE, WILDLANDS DEFENSE	We are concerned about pollution and contamination of waters from herbicide use, including in construction, operation, and any "mitigation" fuelbreaks, deforestation, or other treatments that may be spawned. Continued chronic livestock grazing disturbance in this landscape will ensure weeds remain a constant and ever-growing problem, and that flashy fine fuels cause rapid spread of wildfires. There is danger of transformer leakage and other contaminants entering ground and surface water as well. See WLD comments on Boise District Weed EA and others, describing inadequacy of BLM herbicide analysis and risk assessments, especially given the alarming expansion of BLM chemical use and aerial application that the agency is seeking to impose across the region. This includes the Soda Fire and its highly controversial Rehab, the massive FIAT ordained fuelbreak compartmentalization of the landscape that has never undergone NEPA, and many other ways.	Revising the Soda Fire Rehab activities is beyond the scope of this analysis. See the response to your similar comment on herbicide use above.
101611	(lxxi)	KATIE FITE, WILDLANDS DEFENSE	The MEP proposes habitat restoration to convert "non-native grasslands to native perennial plant communities" as well as to conduct "noxious weed control." Restoration is not defined. Additional water may be needed to support the 1,500 acres of vegetation restoration. Does this mean the "mitigation" involves watering seedings – that in the end will succumb to cheatgrass in interspaces or other weeds when livestock grazing resumes? How much water will be required? Where will it be used?	The SEIS states that the Proponents' MEP lacks sufficient detail to evaluate it. Refer to Appendix K in the FSEIS for additional information on mitigation and enhancement.
101611	(lxxii)	KATIE FITE, WILDLANDS DEFENSE	What are the current biota inhabiting playas in the SRBOP or elsewhere that may be impacted in any way by this project, including through deposition of pollutants from the drainage network? Have playas been surveyed for rare fairy shrimp or other organisms? For Davis peppergrass? Further, tumbleweeds generated by Gateway disturbance may blow onto both slickspots and playas, and choke the surface, harming rare plant habitats.	Playas/slickspots provide habitat for slickspot peppergrass and Davis's peppergrass; the Element Occurrences are in the IDFG Natural Diversity Database. The majority of slickspot peppergrass occurs in Management Area 1 (see the map and description in Appendix K). Davis's peppergrass occurs in Management Area 2. Slick spots have been impacted by cheatgrass, forage kochia, and other non-native seeded species. Tumbleweed occurs throughout the NCA. As discussed above, EPMs included in the EIS would reduce the risk for weed seed transport. Slickspot surveys were completed for both peppergrass species. The last surveys for fairy shrimp occurred prior to the RMP. If a route through that area is approved, new surveys would be completed and measures implemented to avoid impacts; see Appendix M.
101611	(lxxiii)	KATIE FITE, WILDLANDS DEFENSE	The SEIS continue to ignore the high Open Space value of areas disturbed, degraded or destroyed by the project in this most populated region of Idaho.	The EIS/SEIS includes routes that follow existing transmission lines and roads to varying degrees. The project attempted to site the Gateway West lines along existing infrastructure where practicable to avoid new impacts to open space. It also considers routing the lines in other areas as part of the range of alternatives.

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101611	(lxxiv)	KATIE FITE, WILDLANDS DEFENSE	Will Gateway facilitate the disposal of state land? Is Idaho Power's insistence on a southern route at all related to the proposed state and BLM land swap at Big Hill (south of Bruneau), or other state land deals or foreseeable disposal - with potential energy, waste, or military projects being placed on Big Hill if it enters state ownership??	The Project is not related to any possible BLM-State land exchange.
101611	(lxxv)	KATIE FITE, WILDLANDS DEFENSE	The project affects Historic Trails, a Scenic Byway and other recreational site areas plus significantly alters and mars Open Space lands. The SEIS states: Recreational resources on federal lands for the Revised Proposed Route along Segment 9 are regulated in part by the Cassia, Jarbidge, SRBOP, and Owyhee RMPs, as well as the Twin Falls and Bruneau MFPs. Many of these plans are very old, and there has been large-scale degradation and/or changes to natural and biological values, viewsheds, and recreational uses, despite Open Space and undeveloped areas becoming more and more scarce. At the same time, dramatic changes have occurred to many habitats, open spaces, trail settings, affecting wildlife and other values. These are caused by continuing habitat degradation and loss, chronic grazing disturbance promoting flammable invasive weeds and preventing post-fire rehab, wildfires fed by grazing-caused weeds and climate change – and which in turn promote more weeds. There are also now stinking ugly CAFOs on private lands, huge industrial wind farms on private lands, increased military activities, and overflights by louder and louder planes, and a host of other disturbances and changes all of which adversely affect biological values, recreational values and the quality of experiences on public lands, and that have increased since old plans were adopted.	Effects on NHTs and scenic byways are disclosed in the EIS. The existence of animal feed lots and wind farms is considered in the analysis.
101611	(lxxvi)	KATIE FITE, WILDLANDS DEFENSE	Habitat Restoration must be changed to use only native plant species, and focus on full recovery of ecosystem components including microbiotic crusts. The goal for the Proponents' habitat restoration proposal is to convert "non-native grasslands to native perennial plant communities" as well as to conduct "noxious weed control." This means rampant cwg and kochia seeding could take place. BLM claims: "The proposed habitat restoration proposal would have neither a beneficial or detrimental effect on land use or recreation". This is nonsense. Having a sagebrush plant community increases wildlife viewing, photography involving wildlife, and aesthetic values – as just one example of the "value". Idaho Power can plan years in advance to have local native ecotype seed collected and grown for use in rehab, and must retire grazing in rehabbed and any mitigation areas to protect any investment and to ensure the rehab is "durable".	While we agree that native species are desirable, attempts to replace extensive areas of invasive annual grasses and forbs (including cheatgrass) with native species has not met with much success. The use of a mixture of desirable native and non-native perennial grasses, shrubs and forbs that are more fire resistant is one treatment being considered.
101611	(lxxvii)	KATIE FITE, WILDLANDS DEFENSE	Predictably, the SEIS analysis is all about how the project affects cows, not how cows affect the project, and drive uncertainty of effective mitigation, as well as cause serious direct, indirect and cumulative adverse impacts to public land values also threatened by Gateway. Table 3.18.1 merely provides a list of allotment names and grazing "leases", with no analysis of the severe adverse footprint of grazing across these areas or the landscape, and its direct indirect and cumulative effects to values of the lands that are also impacted by Gateway. There is no analysis of how grazing amplifies climate change effects and stresses (Steinfeld et al. 2006, Beschta et al. 2012 and 2014). There is no consideration of how grazing will hamper and/or prevent effective and "durable" mitigation and rehab.	Please refer to the 2013 FEIS for a discussion on the effects of grazing on habitat. Section 4.4.7, for example, identifies grazing pressure as one of the major factures affecting native habitats, along with vegetative clearing for mining, residential development, and energy infrastructure, including power lines. .
101611	(lxxviii)	KATIE FITE, WILDLANDS DEFENSE	The SRBOPA RMP itself recognized how marginal for grazing many areas currently were, but BLM has done nothing to address this. ANY higher quality SRBOPA lands should undergo grazing permit retirement as mitigation for this project. WHERE are all such lands located? What is the current ecological health of the affected land, its habitat value, and what species actually occur on these lands? How is livestock grazing disturbance currently impacting native biota here – for example, grazing during spring, or winter, increasing predation, increasing flammable invasive species, depleting habitats for raptor prey species, etc.	Revising grazing practices in the SRBOP is beyond the scope of this analysis.
101611	(lxxix)	KATIE FITE, WILDLANDS DEFENSE	We're dismayed at how the SEIS underplays the effects to honeybees. Honeybees (and native pollinators in this region) face a host of threats, including exposure to pesticides, and now more potential electrical transmission concerns. The EIS ignores or utterly minimizes concerns.	Your comments on honey bees are noted.
101611	(lxxx)	KATIE FITE, WILDLANDS DEFENSE	SEIS 3-21-1 and 2 lists numerous concerns about the electrical environment that are not adequately studied and assessed. There is no discussion of the effects on wildlife.	The effects on the electrical environment are discussed in detail in Section 3.21.
101611	(lxxxi)	KATIE FITE, WILDLANDS DEFENSE	SEIS describes using both red and infrared lighting in military areas and Jarbidge MOA How will this affect wildlife? Why in the world would military aircraft be flying so low?	As discussed in the EIS, some routes are adjacent to military training areas, including the Orchard Combat Training Center and the Saylor Creek Range. Low-flying aircraft use these areas for training.

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101611	(lxxxii)	KATIE FITE, WILDLANDS DEFENSE	The project is likely to contribute to a significant increase in "range" fires over its life, and this will impact air quality. Windblown dust is likely to contain herbicides and potentially other chemical contaminants. Livestock grazing and especially trampling across the areas disturbed by Gateway will result in long-term cumulative effects	Your comments on fires and grazing are noted. Cumulative resource effects are discussed in Chapter 4.
101611	(lxxxiii)	KATIE FITE, WILDLANDS DEFENSE	The reason BLM refuses to require native plants is that they take longer to establish, and so require significant rest from livestock grazing.	As discussed above, attempts to replace invasive annual grasses and forbs (including cheatgrass) with native species has not met with much success. The use of a mixture of desirable native and non-native perennial grasses, shrubs and forbs that are more fire resistant is one treatment being considered.
101611	(lxxxiv)	KATIE FITE, WILDLANDS DEFENSE	The SEIS describes raptor species and nest numbers (77) at time of SRBOPA designation. How many are there now? What have the changes by species been? How has loss of jackrabbits impacted this?	See the discussion in Section 3.24, a Section on the SRBOP that is included in the FSEIS.
101611	(lxxxv)	KATIE FITE, WILDLANDS DEFENSE	SEIS describes access yards, fly yards, laydown areas, etc. It describes Segment 9: At MP 33, the FEIS Proposed Route crosses the Salmon Falls Creek at Lilly Grade adjacent to an existing single-phase 34.5-kV distribution line just north of the Salmon Falls Creek wilderness study area (WSA) and a VRM Class I designated viewshed approximately 6 miles south of the community of Castleford. The area crossed is part of an Area of Critical Environmental Concern (ACEC), a Recreation portion of an eligible Wild and Scenic River (WSR). The route was revised between the Draft and Final EIS to cross below the Wild portion of the eligible WSR. (2-8) The line must be moved outside the ACEC and outside the WSR corridor.	Comment noted. These issues are all discussed in the EIS/SEIS.
101611	(lxxxvi)	KATIE FITE, WILDLANDS DEFENSE	Please explain this more: "Several raptor nest buffers are crossed as the route continues northwest through the Bruneau Desert". It crosses Bruneau wetlands DU area. We oppose the rare plant protection stripping LUP amendment.	See Figure E.10-3 in Appendix E. The Segment 9 routes pass near several ferruginous hawk nests. Your opposition to any reduction in protections for rare plants is noted.
101611	(lxxxvii)	KATIE FITE, WILDLANDS DEFENSE	We find this discussion very unclear and confusing: The SRBOPA RMP would need amendments to permit surface-disturbing activity within 0.5 mile of sensitive plant habitat, and to allow a new utility corridor across the northern portion of the SRBOP between MP 99 and MP 124.5, as well as between MPs 65.7 and 67.7. While there is a corridor adjacent to the Revised Proposed Route between MPs 65.7 and 67.7, it is a narrower 1,000 feet in the SRBOP, as opposed to the 3,000 feet on either side; it therefore does not include the alignment for the Revised Proposed Route and an amendment would be needed. We oppose these amendments: The route would not be in conformance with the 1987 Jarbidge and would need amendments to change the VRM Classes, cross the Oregon Trail, and change a utility avoidance/restricted area designation.	Your opposition to these amendments is noted.
101611	(lxxxviii)	KATIE FITE, WILDLANDS DEFENSE	The Revised Proposed Route crosses the Snake River south of Sinker Butte, whereas the 2013 FEIS Proposed Route did not cross the Snake River. From MP 154.7 to the Hemingway Substation, the route is the same as the 2013 FEIS Proposed Route. Please describe this in more detail, and provide detailed mapping and overlays: Key factors considered in routing this segment were agricultural and residential development in Owyhee County, visual resources, the Jarbidge Military Operations Areas, Saylor Creek Air Force Range, Mountain Home Air Force Base (AFB), Balanced Rock County Park, Bruneau Dunes State Park, the Cove Non-Motorized Area, greater sage-grouse leks and priority habitat, and the Salmon Falls Creek WSR, as described in the 2013 FEIS. Key factors considered since the 2013 FEIS included the amount of new road that would be constructed and maintained within the SRBOP and in unroaded areas in Owyhee County, and minimizing the construction of transmission towers and roads near sage-grouse leks, and within sage-grouse habitat.	The routes are shown on maps in Appendix A. The key factors considered for routing are discussed in Chapter 2. For example, routes were sited to avoid crossing the air force base, residential developments, pivot irrigation systems, etc., to the extent practicable. While one route attempted to avoid the NCA, another was sited to avoid private land by crossing the NCA.

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101611	(lxxxix)	KATIE FITE, WILDLANDS DEFENSE	There would be two Snake River crossings with Revised Route 9, meaning even more possibility of collisions of waterfowl, migrating birds, etc. The SEIS states: At MP 33, the Proposed Route crosses the Salmon Falls Creek at Lilly Grade adjacent to an existing single-phase 34.5-kV distribution line just north of the Salmon Falls Creek WSA and a VRM Class I designated viewshed approximately 6 miles south of the community of Castleford. The area crossed is part of an ACEC, which is a Recreation portion of an eligible WSR. The route was revised between the Draft and Final EIS to cross below the Wild portion of the eligible WSR. Several raptor nest buffers are crossed as the route continues northwest through the Bruneau Desert. This demonstrates severe environmental conflicts with this route, and it should be scrapped. We oppose these amendments to the management direction provided in the 1987 Jarbidge and SRBOP RMPs and the Twin Falls MFP.	Your comments on land management planning are noted.
101611	(xc)	KATIE FITE, WILDLANDS DEFENSE	Why is there still only a 2014 version of the MEP? Why by the time of the 2016 SEIS, has a sufficient plan not be developed, or is the real problem where the fact that many elements of the line (like the intrusion into the area by Salmon Falls Creek) simply cannot be mitigated? The SEIS states: Proponents have developed a draft MEP (August 2014) aimed at offsetting impacts to resources and values and enhancing the resources and values found in the SRBOP • Avoidance and minimization through routing and environmental protection measures (EPMs); • Mitigation that requires so-called “enhancement ratios” designed to rectify direct impacts beyond standard mitigation; • Restoration efforts consistent with SRBOP required mitigation goals and objectives; • Visitor enhancement activities; • Reclamation and project-wide compensatory mitigation; • Removal of existing power lines and substation within the SRBOP. • Purchase of high-priority private inholdings in the SRBOP; and • Improved funding of law enforcement HOWEVER, basic information has not been finalized. So it is impossible to analyze effects of alternatives and develop appropriate mitigation. Example, the SEIS shows that: A final POD, and any POD supplements, submitted by the Proponents is incorporated into the “Terms and Conditions” of BLM ROW grants and becomes a binding requirement that the Proponents must comply with. PODs contain typical construction diagrams, identify access roads and facility locations, and describe construction and reclamation practices as well as other environmental mitigation measures. In large and complex linear projects, final detail is seldom available when the ROW grant is issued. The BLM may issue a ROW grant but withhold use of the granted area until final design and other environmental requirements are met. A Notice to Proceed is issued when all requirements are met (43 CFR 2805.10 (a)(2))”. THIS is unacceptable. Idaho Power has had many years to fine-tune this dinosaur of a project, and still has not done so. A SECOND supplemental EIS must be issued.	The MEP is a design feature of the Proponents' application, which was submitted in 2014. No new application has been received; therefore, no newer version exists. See Appendix K for an updated version of the BLM's proposed mitigation framework.
101611	(xci)	KATIE FITE, WILDLANDS DEFENSE	Amending the SRBOPA RMP shows the absurdity of this all. It has been in place for 9 years. Nothing has been changed to comply with the RMP related to grazing. Lands get beat to death annually by livestock. Large amounts of restoration are promised in the RMP, but have not taken place. Promises of making the condition of the land better through restoration have been forsaken, as it would require removal of livestock. The RMP designates corridors, and Gateway must be confined to those areas. Ground squirrel shooting is rampant. Human use is ever-increasing. Promised restoration has been forsaken. Yet the SEIS proposes to have protections of the RMP cast aside. At the same time, the Four Rivers BLM has had an RMP underway for a decade now, and it was stalled by rancher and other interference in the RAC. In the meantime, severely damaging projects like the Paradigm Fuelbreak, forage kochia seeding and harmful grazing have been imposed in lands north of I-84. For many years now, BL has promised it would evaluate Open Space as a value in the Four Rivers RMP process. We are greatly concerned about the Plan changes in SEIS Table 2.3.1. These plans were developed with knowledge that the values the RMP tried to protect were under significant threat in this landscape, and needed protection. The promises they made to the public must be adhered to, not broken for this dinosaur of an unnecessary destructive transmission line.	Grazing management in the NCA is beyond the scope of this transmission line analysis.

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101611	(xcii)	KATIE FITE, WILDLANDS DEFENSE	We esupport the following, and there is no valid reason it should not be considered - Glenns Ferry – Mayfield variation was developed by the RAC Subcommittee as a potential single-corridor option for siting both Segments 8 and 9 (see the Common Corridor/Double Circuit Alternative discussed in Section 2.4.5) north of the SRBOP. The route variation runs from the Glenns Ferry area to Mayfield, southeast of Boise, where it would join the other route options described for Segment 8. The route generally parallels 250 feet south of the existing 500-kV transmission line for much of its length in a single-corridor with the Segment 8 King Hill – Mayfield route. Although this variation would eliminate the need for a southern route and associated impacts, the single-corridor option does not meet the Proponents' objectives of having two separate lines to enhance system reliability. This makes no sense, as Idaho Power could build two separate lines here. What is really taking place is BLM is blindly accepting the proponent's claims – without scientifically vetting them. The BLM considered the information gathered by the RAC Subcommittee in the study for the Glenns Ferry – Mayfield route variation, and eliminated this variation from further consideration in the SEIS because it does not meet the Proponents' reliability objectives. It makes no sense that this would not be "reliable". We have just seen Idaho Power having to back off on other claims. Routes should not be eliminated merely because they are a few miles longer. This is arbitrary, and in the context of the total cost of this boondoggle, the difference in cost would make no real difference. We are greatly concerned about how much weight the RAC gave to private lands, and has often ended up sacrificing public lands values. This is part of the extreme politicization of this process.	Your support for a common corridor alternative is noted. Refer to Chapter 2 for a discussion of why this was not considered in detail.
101611	(xciii)	KATIE FITE, WILDLANDS DEFENSE	This EIS fails to accurately describe the environmental baseline, or examine a viable range of alternatives. It fails to comply with sage-grouse and other biological conservation plans and protections for native biota of all kinds, as well as wild land and recreation values of the public lands.	The analysis considered over 50 alternatives. Effects on the sage-grouse and other species are analyzed in Chapter 3.
101611	(xciv)	KATIE FITE, WILDLANDS DEFENSE	We are very concerned about the continued SEIS reliance on the HEA and other models. HEA is supposed to be a "method of quantifying the permanent or interim loss of habitat services [what an absurd term!] from project-related impacts". This model is not adequate to establish a valid mitigation/compensatory plan, or to regulate or understand project activities and impacts during construction, operation and de-commissioning. It omits or downplays key elements of landscape setting and project context, the relative importance and scarcity of undeveloped wild habitats and landscapes impacted by Gateway routes, and many other key attributes necessary to understand impacts of all potential routes and foreseeable and linked developments once Gateway pioneers a new path through, tearing down longstanding Land Use Plan protections for this line and other energy infrastructure to follow. The SEIS must examine conditions to at least 10 miles distance from leks and all important seasonal habitats. It must fully consider that grouse may nest even further from leks and move over vast landscapes in the course of the year – especially in fragmented landscapes. In fact this is what was determined in studies in the Jarbidge country well over a decade ago, including by Commons. Gateway may bring about expanded GRSG and other sensitive species range perforation, as occupied habitats shrink further and further due to the line and wind or other development it may spawn The full Gateway Footprint must be understood in terms of affected populations and the landscape that birds use over the course of the year in fulfilling all of their seasonal needs, including habitats that ensure movement and connectivity.	See the response to your similar comments on sage-grouse mitigation above,

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101611	(xcv)	KATIE FITE, WILDLANDS DEFENSE	The SEIS refers to the HEA model that surfaced in the earlier Gateway documents to continue to be used. There the HEA had stated: “the ‘currency’ under the ESA is the number of individuals in a population”. First, we object to this characterization –especially from an entity that apparently does not understand that these individuals require undisturbed habitat and the Footprint of the project impacts crucial habitats in myriad ways unexamined in this cursory and incomplete EIS. Second, why is there no site-specific information presented on the CURRENT 2016 local and regional populations, currently active leks, numbers of birds on leks in recent years, and number of GRSG individuals and the populations impacted? Why isn't this done for many other sensitive or imperiled species? Following on this “currency” – it is certainly necessary to understand how reduced populations have become, and predictions of how severe foreseeable declines triggered by Gateway will be will be –to understand the ecological “cost” of the project and the “value” and effectiveness of any claimed mitigation. How many individuals are found in all populations in all areas traversed by all potential routes now? How are these populations defined, and what are their boundaries? How much available habitat, and of what quality is this habitat, for all existing populations? How will any potential route and mitigation actions impact habitats and populations of other important, rare and imperiled species? Also following on this “currency” scheme: Money can’t buy you enough wild birds to make a sustainable population and make up for the destruction that you do --- If your route is essentially so damaging it is not able to be properly mitigated. As habitat becomes more and more fragmented and populations drop, impacts of new disturbances may become of much greater importance to persistence. Crist et al. 2015, PEW Garton et al. population analysis, for example. This is the case with many portions of the various Alternative routes through intact sagebrush and other public lands. Wildlife may need a complexity of connected habitat types – and areas with suitable conditions resulting from topography, vegetation, water sources, etc. cannot be replicated. Models based on fallacies or mere acreage replacement are divorced from understanding the species needs in time and space.	See the response to your similar comments on sage-grouse mitigation above.
101611	(xcvi)	KATIE FITE, WILDLANDS DEFENSE	Wildlife populations are increasingly boxed into smaller and smaller areas. Industry like Idaho Power refuses to leave these blocks of remaining habitat alone. BLM abdicates its duty as a steward of the public lands in failing to require that the energy industry route projects in existing Corridors and disturbed areas. Agencies cannot use only “acres disturbed” in understanding impacts, or in determining mitigation requirements and other measures. The entire Footprint of the project on a landscape species – like sage-grouse must be examined. The visual blight/intrusion, noise, roading, weed expansion, predator-promoting and all other impacts and the greatly expanded industrial Footprint of all potential routes must be provided.	Impacts to visual resources are analyzed in considerable detail in Section 3.2 and Appendix G and E. Noise is analyzed in Section 3.23, road development in 3.19, invasive weeds in Section 3.8 and wildlife in Sections 3.10 and 3.11.
101611	(xcvii)	KATIE FITE, WILDLANDS DEFENSE	Not only is the EIS devoid of a vlaid plan for modeling habitats, it also lacks DDC analysis. DDC in the EIS is tied to the Wyoming core area concept model. WWP believes this Core area concept, and continuing and additional development and fragmentation that it allows is not adequate to conserve and protect sage-grouse in nearly all instances. But the Idaho Power EIS doesn’t even conduct and present necessary minimal analysis to understand impacts on core areas. A great flaw of the Core concept is that it is focused on leks - and promotes sacrificing/triage of whole land areas and important wintering and other habitats if lek numbers and density are not as high as other areas. Thus, populations that may have fewer birds are being sacrificed. But sage-grouse across the Project Footprint are in such a perilous state that all efforts must be made to retain all populations – and not write some off just because a Core Model does not include them. In fact, reliance on the core concept can have devastating impacts – if, for example, a large wildfire removes the main Core Area in a region, or higher populations collapse due to disease or unforeseen events. Such shortcomings and risks must be fully examined – especially since the project heightens fire risk. A full and fair analysis of the impact of this project on all affected habitats and populations of sage-grouse must be provided. How viable will all populations in all areas of the footprint of all potential routes be? How viable are they now? In 10, 20, 50 and 100 year time frames?	Your comments on the Core system are noted. The USFWS has accepted this concept.

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			There is no excuse for Idaho Power's failure to have conducted all of these analyses and provide them to the public at the stage of the SEIS. Informed full public comment cannot occur until this is done. The degree and severity of impacts of any route cannot be fully understood. It is also impossible for the agency to understand the need for additional or altered alternatives or how much mitigation would be required until this is done. Since the Core Area concept is lek based --- it may omit essential wintering, nesting, brood rearing or other habitats that are key to the survival of sage-grouse a landscape bird, and also that provide crucial connectivity. We can only conclude that Idaho Power is rushing to get this EIS shoved through before public outrage at these expensive and environmentally damaging transmission projects escalates further. As soon as an EIS process is completed, and a record of decision signed, Idaho Power could turn around the day after, and essentially sell the right-of-way to another party. If full analysis is not conducted now, there is no hope that it ever will be adequately done. Foreign developers, energy speculators, or anyone else could buy the right-of-way. Unless iron clad mitigation based on best available science and full current baseline data is laid out and alternatives impacts clearly understood, there is no way that impacts on species and their habitats will actually be minimized or properly mitigated.	
101611	(xcviii)	KATIE FITE, WILDLANDS DEFENSE	Additionally, the methods described for HEA and other analysis are greatly inadequate. These include BLM using a DDC "tool" to automatically sum up disturbances within the DDC analysis area, and determine how many occur there. It appears the "disturbance" of a road will be treated the same as the "disturbance" of a powerline – yet the project will often result in BOTH occurring in the same area. Is a mine disturbance the same as a fence? Is a fence considered a "disturbance"? Since fences cause very significant mortality to sage-grouse, certainly these too must count. Is herding thousands of domestic sheep and sheep camps annually situated on top of grouse leks a "disturbance"? Is a fire a disturbance? How in the world will all of this information be considered and integrated? Is a transmission line disturbance the same as an oil and gas rig disturbance?	See our response to your similar comments on the HEA above.
101611	(xcix)	KATIE FITE, WILDLANDS DEFENSE	We are baffled at how this process could have already taken so long to date, yet essential data and analysis are lacking. This appears to be a "don't look, don't find" EIS where damaging alternatives were spun off without forethought as a kneejerk response to some private interests. Sage-grouse use breeding habitats with much greater shrub canopy cover than just 10-25%, and other artificial canopy breaks that have been used in this process. This must be corrected, and areas with greater canopy cover included. All mature and old growth sagebrush communities must be identified and protected. Where are these areas in the Project Footprint? The EIS mentions that sage-grouse are capable of traveling long distances. WHERE then is the necessary analysis of how and where sage-grouse from all affected populations move through or across the lands affected by all potential routes or project components and linked developments in the course of their annual cycle? Much more current and accurate information must be provided on the number of actually active leks in all four states based on comprehensive systematic baseline surveys within at least 10 miles of all potential routes. Some wildlife departments at times try to conceal how severe declines and losses have been in some areas. Full information on all lek counts for all periods of time for all affected populations of sage-grouse and sage-grouse habitat must be provided. As part of this project, intensive baseline surveys and lek searches must be conducted across the affected habitat area and population – a minimum distance of 10 miles from all potential routes. Habitat quality and ecological conditions in this area, too, must be assessed and provided. What is the quality of all habitat? When is it used, and how is it connected to large blocks of undisturbed habitats? How fragmented is this habitat? What is the habitat configuration – as sage-grouse habitat is not linear – and what are the threats to it?	See our response to your similar comments on the HEA above.
101611	(c)	KATIE FITE, WILDLANDS DEFENSE	DEIS at 3.11-27 stated "there are approximately 2,124 known greater sage-grouse leks within the state of Idaho (854 occupied, 98 unoccupied, and 1,172 undetermined status); 2,257 leks in Wyoming (1,871 occupied, 285 unoccupied, and 101 undetermined status); Nevada is "uncertain". There is a significant difference in how states identify active leks – in Idaho – occupied once in 5 years, vs. Wyoming – occupied once in 10 years. WHY haven't uncertainties and "undetermined" status - within ten miles of all potential routes and as necessary t understand the status and trajectory of the population - been cleared up by now? HOW many active leks are there now in 2016 and what are the trends in bird numbers at these leks, compared to 2013, and how have habitat conditions changed?	See the analysis of sage-grouse in Section 3.11 for information on leks.

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101611	(ci)	KATIE FITE, WILDLANDS DEFENSE	In understanding the degree and severity of impacts of the footprint of this development on wildlife species, rare plants, the health and integrity of native vegetation communities, it is essential that regional, local and site-specific mapping of current cheatgrass/medusahead and other weed presence, as well as risk of expansion, be undertaken. Then, the risk of the roading and ground disturbance impacts of this project in accelerating or causing weed infestation must be understood across the project Footprint. This analysis must fully consider the role of continued livestock grazing on top of	The risks of invasive plant species infestation and the measures proposed to prevent infestations and to treat existing ones are found in Section 3.8. Also see Appendix K.
101611	(cii)	KATIE FITE, WILDLANDS DEFENSE	The EIS woefully fails to provide detailed information on current ecological conditions, rangeland health status, degree of depletion of understory, degree of habitat fragmentation, habitats important for connectivity, condition of microbiotic crusts, etc. since many recent BLM lands have no recent assessments, or the few that may have been done have downplayed livestock grazing and trampling impacts. New studies must be conducted in the footprint of all possible routes.	See our response to your similar comment above.
101611	(ciii)	KATIE FITE, WILDLANDS DEFENSE	Vehicles accessing or passing by the site (both workers and the public) will carry weed seeds to and through the Footprint – and livestock then transport seeds onto bare project-disturbed soils.	See the measures designed to prevent this in Section 3.8.2.5.
101611	(civ)	KATIE FITE, WILDLANDS DEFENSE	Sage-grouse are a landscape species. They require large tracts of undeveloped wild lands, with birds moving over vast areas to fulfill their seasonal needs, and sustain viable populations.	The literature and the analysis in this EIS support this comment.
101611	(cv)	KATIE FITE, WILDLANDS DEFENSE	New habitat fragmentation and loss of connectivity are of great concern to sage-grouse ecologists. Current sage-grouse literature describes these effects. Knick and Connelly 2009/2011 Garton et al. Chapter population analysis, 2015 PEW Garton et al. analysis. Greater Sage-Grouse Population Dynamics and Probability of Persistence. http://www.pewtrusts.org/~/media/assets/2015/04/garton-et-al-2015-greater-sagegrouse-population-dynamics-and-persistence-31815.pdf; Crist et al. 2015 http://pubs.usgs.gov/of/2015/1158/ofr20151158.pdf Range-Wide Network of Priority Areas for Greater Sage-Grouse—A Design for Conserving Connected Distributions or Isolating Individual Zoos? This describes: These priority areas individually are likely too small to support viable sage-grouse populations within their boundary. Without habitat corridors to connect small priority areas either to larger priority areas or as a clustered group within the network, their isolation could lead to loss of sage-grouse within these regions of the network. This is certainly the case with the small, increasingly isolated habitats and populations of greater sage-grouse and other species inhabiting the Gateway and B2H project landscape.	See our response to your similar comments above.
101611	(cvi)	KATIE FITE, WILDLANDS DEFENSE	Crist et al. 2015 also state: Broad-scale habitat loss and fragmentation from synergistic cycles of wildfire and conversion to invasive plant communities as well as from human land use is the primary cause of population declines (Knick and Connelly, 2011). The most pressing challenge to long-term sage-grouse persistence is conservation of remaining large and intact sagebrush landscapes (Stiver and others, 2006). Thus, new studies highlight the perils to the species survival that habitat fragmentation poses. Mapping with the project does not provide a solid baseline of the existing on the ground vegetation communities, the condition of these communities (including exotic grass species presence, bare soil areas, health of microbiotic crusts) and other vital data. It also does not place the project in context so the relative degree of habitat loss in the landscape can be understood. This is necessary so the relative scarcity of threatened values can be assessed and project harms minimized and mitigated, as required under FLPMA. Where will this project eliminate and/or newly fragment the primary intact habitat areas that remain for biota of concern - in a landscape increasingly choked by weeds, and greatly altered by human disturbances such as ubiquitous intensive livestock grazing, lethal facilities such as fences, weed-exacerbated fire, vegetation treatments, energy development, mining activity, roading, etc. B2H and Gateway will cause significant new fragmentation and alteration of the landscape and habitats, and lead to further isolation of populations already greatly reduced in numbers. The effects of the project will further reduce the resilience of the landscape, and amplify the adverse effects of climate change for the sage-grouse and many vulnerable species of native animals and plants.	See our response to your similar comments above.

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101611	(cvii)	KATIE FITE, WILDLANDS DEFENSE	The EIS, still incomplete resource reports, and weak mitigation examination dramatically under-estimate how severe the transmission line's direct, indirect and cumulative impacts will be - altering big game use of food, cover and space, impairing the ability of sage-grouse to use a combination of crucial seasonal habitats and maintain population viability. They also underestimate the cumulative effects, and foreseeable impacts of treatments, energy, mining, intensification of livestock grazing and other developments and disturbances the project will cause. Projects will be accompanied by increased human disturbance and intrusion into public, state and private land areas. Despite the project impacting and impairing large areas of private land, and very important blocks of public land, the analysis provides little hope that the impacts to the affected natural resources and residents will be properly taken into account, mitigated, addressed.	Comment noted. See our response to these same points above.
101611	(cviii)	KATIE FITE, WILDLANDS DEFENSE	There is significant new biological information on sage-grouse, showing that the presence of livestock in lands increases raven presence. Ravens have been maligned as a sage-grouse nest predator. Now the role of livestock grazing, not only in reducing protective cover and disturbing birds off nest, but also in increasing raven presence in the landscape, has become known. Grazing represents a significant cumulative threat to sage-grouse and other important and sensitive native biota. http://www.usgs.gov/newsroom/article.asp?ID=4463#.VvMwm6tUOII , http://onlinelibrary.wiley.com/doi/10.1002/ecs2.1203/full • The probability of raven occurrence increased by 45.8 percent in areas where cattle were present. • Ravens preferentially selected areas near sage-grouse breeding grounds, called leks, especially at sites where cattle were present. Landscape characteristics also influenced raven occurrence. For example, ravens selected relatively open (fewer trees) low elevation areas, specifically those with cropland, wet meadow and urbanization.	See our response to your similar comments above.
101611	(cix)	KATIE FITE, WILDLANDS DEFENSE	There is significant new information confirming cattle as a vector for medusahead weed dispersal.Chuong et al. 2015 provide new information on cattle grazing as a dispersal vector for a particular ecological scourge facing the landscape, the flammable annual invasive grass medusahead that is a rapidly expanding grave threat to native ecosystems in the region. https://www.researchgate.net/publication/283183708_Cattle_as_Dispersal_Vectors_of_Invasive_and_Introduced_Plants_in_a_California_Annual_Grassland	The EIS states that cattle can spread weeds. Weed vectors are discussed in Section 3.8.
101611	(cx)	KATIE FITE, WILDLANDS DEFENSE	Finally, we evaluated the potential for the noxious weed medusahead (Taeniatherum caput-medusae (L.) Nevski) to travel long distances on cattle fur using a detachment experiment with a model cow. We found that forms were more likely to be dispersed by endozoochory, and invasive species were more likely to be dispersed by epizoochory. Medusahead was dispersed exclusively by epizoochory, and was able to travel up to 160 m on a model cow. Our results suggest that cattle may be an important dispersal vector for both invasive and non-invasive plants. The invasive species threats are great. As part of this process, any RMP amendment undertaken must amend RMPs to provide mandatory Integrated Weed Management to overcome the standard BLM/FS "spray and walk away" approach. RMP amendments should be done to improve ecological conditions, not further degrade the environment in this landscape that has already suffered so many assaults. These amendments must include that no grazing occur on the disturbed lands of the project Footprint until recovery of native vegetation occurs. Grazing must be pulled back to existing pasture boundaries – i.e. the "pastures" through which the project and access roads pass must be closed to grazing use until successful rehab with native species is realized.	See our response to your similar comments above.
101611	(cxi)	KATIE FITE, WILDLANDS DEFENSE	Highly controversial segments 8 and 9 were split off from the controversial eastern portion of Gateway several years ago. Segmentation of Gateway was undertaken to try to tamp down on broad public opposition to this expensive and unnecessary project. The cumulative adverse direct, indirect and cumulative effects of the earlier ROD and linked development and mitigation must be assessed. In 2016, the public is again faced with a western leg of Gateway, at the same time that BLM has developed its preferred Alternative for Idaho Power's Boardman to Hemingway (B2H) transmission line. Inexplicably, BLM has refused to conduct a necessary SEIS for B2H despite the long delay, the new serious cumulative effects of the Soda Fire and other recent fires, and new and expanding weed threats amplified by climate change stress, and other developments.	Determining whether an SEIS for B2H is needed is beyond the scope of this analysis, which is considering the Gateway West transmission line.

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101611	(cxii)	KATIE FITE, WILDLANDS DEFENSE	With the Gateway line, minimal new information is presented. This is despite scientific information on climate change threats and effects (Beschta et al. 2012, 2014, Comer et al. 2012 (most complete REA – REA for Gateway region is based on minimal and and out dated info), livestock grazing effects Manier et al. 2013 Baseline Ecological Report http://pubs.usgs.gov/of/2013/1098/OF13-1098.pdf , the fragility of the sage and western juniper ecosystem, invasive species (Chuong et al. 2015), and increased endangerment of many native plant and animal species.	See our response to your similar comments above.
101611	(cxiii)	KATIE FITE, WILDLANDS DEFENSE	With Gateway and B2H, there are many parallels with the long expressed concerns about the DOE Corridors - and potential industrial wind and other expensive remotely sited and often wasteful "renewable" energy mega-projects that would proliferate once very expensive large-scale new transmission lines are put in place. It is unclear what the current status of the WWEC Corridors is, and what was supposed to be updated analysis. Due to an agreement with environmental groups. This has not been clarified. New information was to be provided by federal agencies, and there is still no resolution. The original Appeals of Gateway's eastern segment still have not been resolved by IBLA.	See our response to your similar comment on the WWEC above.
101611	(cxiv)	KATIE FITE, WILDLANDS DEFENSE	Just this week, Idaho Power announced a significant new rate hike to its customers. This is just one of many that will be imposed on the public to pay for these outdated and unnecessary mega-transmission line projects. How much will Idaho Power customers end up paying over time so that all segments of Gateway and B2H can be built?	Rate increase requests are beyond the scope of this analysis. BLM does not regulate these rates.
101611	(cxv)	KATIE FITE, WILDLANDS DEFENSE	Given the deficient, incomplete, and outdated analysis of the 2016 SEIS, a Supplemental Supplemental EIS needs to be prepared if the proponent persists in pursuing this dinosaur of a project!	Your request that a supplemental EIS be prepared is noted. The comment refers to the draft SEIS. The BLM has prepared a final SEIS, e.g., this document.
101611	(cxvi)	KATIE FITE, WILDLANDS DEFENSE	There are altered alternative routes in portions of the Gateway Path. The mapping in the EIS is often confusing. It is still hard to clearly distinguish what is being depicted, and to understand what values of public lands the routes are impacting.	See our response to your similar comment above.
101611	(cxvii)	KATIE FITE, WILDLANDS DEFENSE	BLM should have denied consideration of many of the alternatives that punch through significant habitats, viewsheds, cultural sites, historical trails and other important public lands areas protected under existing Land Use Plans from the start, due to conflicts known upfront. A route that maximizes paralleling existing lines, major roads, the disturbed land areas of WWEC segments, lands north of I-84,and energizing Idaho Power and other Power company's existing line, has still has not been adequately developed and assessed. If Idaho Power needs two lines, they should both be located north of I-84. Another line can be built north from Cedar Hill to accommodate this, even though the southern split line runs to that point.	See our response to your similar comments above.
101611	(cxviii)	KATIE FITE, WILDLANDS DEFENSE	The SEIS, like the DEIS, bombards the reader with confusing information, some of which can be understood by only a power company insider. A reader is told to refer back to the previous and confusing DEIS and FEIS. Such sections must be re-done, and information presented in a manner able to be understood by the public. Scientific information and public input that might contradict many of these sections must also be fully and fairly presented as well. Clearer and detailed mapping of biological, cultural, Trials, scenic viewshed and other conflicts must be provided. At the same time, each section of the Affected Environment is padded with endless repetition of the parts of the MEP depsite its seriously flawed and deficient "mitigation". Perhaps this is to cover up the lack of any new real information of substance, the continued minimal current site-specific biological and ecological information, and other shortcomings in the SEIS analysis of environmental effects.	See our response to your similar comments above.
101611	(cxix)	KATIE FITE, WILDLANDS DEFENSE	Segments would have serious adverse impacts on vital wildlife and sensitive species habitats, migratory birds, rare plant habitats, scenic, cultural, historical and recreational values and they would significantly impact the human residents of the area. The Gateway Project would further degrade, alter, and fragment already highly vulnerable habitats and populations of important and sensitive biota. Of particular concern is the serious impact Gateway and other Corridor projects would have on migratory birds, sage-grouse, and other increasingly rare and imperiled native species. Habitats in this region have already been greatly altered and fragmented from many other land uses, including often chemical intensive irrigated agriculture, chronic public lands and other livestock grazing disturbance, fences, water developments and livestock infrastructure, agency "treatments" that destroy native woody species, and combined effects of these disturbances and desertification processes. Climate change and its impacts are abjectly ignored. Seinfeld et al. 2006, Beschta et al. 2012, 2014, Comer et al. 2013, for example http://pubs.usgs.gov/of/2013/1098/OF13-1098.pdf . The SEIS provides no basis for understanding the baseline ecological conditions, or the degree and severity of degradation that exists in order to gauge impacts of all potential routes.	See our response to your similar comments above.

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101611	(cxx)	KATIE FITE, WILDLANDS DEFENSE	The EIS does not adequately examine the adverse cumulative impacts on native biota, trails and other values of a other corridors/lines/energy developments/disturbances. Detailed in-depth analysis including full discussion of threats and stressors to each affected habitat and population of all species and values of concern must be provided and integrated so that a logical science-based analysis can take place.	See our response to your similar comments above.
101611	(cxxi)	KATIE FITE, WILDLANDS DEFENSE	We question whether this line is really needed. The SEIS does not provide sufficient data and analysis to determine this. Industry energy use in America has waned as jobs have been exported overseas. Economic realities are now much different than when this project was conceived. Scientific innovations have made rooftop solar and de-centralized energy the wave of the future. This line is really a dinosaur, and appears to be the last gasp of a dying energy model - albeit an extraordinarily expensive gasp. Re-evaluation of need for the project must take place. BLM should request review by outside experts not linked to the Proponents. There must also be an honest development and analysis of alternatives to address energy conservation and localized energy generation like roof top solar to meet energy needs. BLM must provide a detailed analysis of the adverse effects of potentially shifting from Wyoming-based coal energy to industrial renewable energy (wind farms) in Wyoming or potential wind farm or energy sprawl in the northern Jarbidge or elsewhere - further destroying sage-grouse and other wildlife habitat. The SEIS is replete with old information and outdated analyses, including of need. This is not acceptable. BLM must call a halt to this whole process until an honest 2016 evaluation of project need and assessment of energy changes over the next 20 years is undertaken. Like B2H, Gateway is a dinosaur that is based on old, outdated models of energy production and distribution. The complete footprint must also be laid out in front of the public. For example, is this project linked to promoting more global-warming gas producing coal-fired plant emissions? Or large-scale industrial wind sprawl in Wyoming, the northern Jarbidge, or elsewhere? Was the split line in Idaho in part about adding transmission for the dangerous mini-nuke porkbarrel project scheme at INL?	See our response to your similar comments above.
101611	(cxxii)	KATIE FITE, WILDLANDS DEFENSE	ANY new line here should follow existing high voltage transmission line paths, disturbed WWEC segments and/or the Interstate to the maximum extent possible, as well as energizing not only existing Idaho Power lines, but with Idaho Power working collaboratively with other powerline operators to bundle Gateway into their existing lines or corridors for use. Shorter distance connecting lines can be built through disturbed areas to help achieve this, as well. The mapping does not allow a viewer to accurately understand all existing transmission lines and disturbed areas so that the full ecological footprint of Gateway can be understood. This project's construction and operation disturbance impacts (including construction and use of access roads and facilities) can not be fully assessed for habitat fragmentation and significant loss and impacts on populations of rare and sensitive animals and plants, historical trails, cultural sites, disturbances to human residents, and many other adverse impacts of such a mammoth transmission project.	See our response to your similar comments above.
101611	(cxxiii)	KATIE FITE, WILDLANDS DEFENSE	Instead of doing this, the EIS includes new potential alternative segments located in often sesnsitive areas, or that increase ecological disturbance and promote energy and other sprawl into less developed or otherwise sensitive areas that provide crucial remnant habitats in a fragmented landscape. A valid ecological baseline has not been established. Site-specific biological and other surveys have not been conducted to enable full and fair comparison between route segments. So the ecological importance of the alternative routes is not able to be understood in making a comparison. This is inexcusable, given how long this project has been on the drawing board and how controversial both it and the Boardman project have become. The full link between the controversial Boardman line and the route choices of the Gateway SEIS must be examined. Bundling any Gateway line into existing utility corridor swaths, coupled with Idaho Power working collaboratively with other transmission line entities to use their corridors would minimize the project's Footprint. It would reduce weed expansion and expanded permanent weed site dominance given the failures of BLM rehab and high levels of livestock grazing impacts across this landscape (Belsky and Gelbard 2000, Chuong et al. 2015). Greater bundling would reduce the need for harmful land-degrading RMP amendments. So much of the sagebrush, views, open space and landscape has been woefully fragmented and developed. This makes amending the Land Use Plans to allow even more development in many areas unacceptable. Any Plan amendments should actually be done to designate ACECs, retire grazing permits, or otherwise protect biological values, migratory birds, Trails, visual resources, cultural sites, rare plants or put in place other protections. It should not be done to strip the protections that are in place. This is particularly the case given the BLM's abject failure to demonstrate it can achieve proper restoration of disturbed sites in the arid lands that both Gateway and B2H would traverse, and the magnitude of losses the area has already suffered.	See our response to your similar comments above.

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101611	(cxxiv)	KATIE FITE, WILDLANDS DEFENSE	We have been dismayed to learn: "… several land management plans would require amendments to allow the Project. In some cases, large areas of public lands would be reclassified, possibly allowing for additional projects without additional plan amendments. These impacts to land use planning goals would be considerable, particularly when taken together with other transmission lines requesting similar consideration, which if granted along the same route would create a large utility corridor". ES- 32-33. Full analysis of the adverse direct, indirect and cumulative effects of carving a new corridor are ignored.	See our response to your similar comments above.
101611	(cxxv)	KATIE FITE, WILDLANDS DEFENSE	Important Landscape-level and Project Footprint baseline information highlighting areas and sites of ecological importance in 2016 has also not been provided. Detailed maps must overlay habitats and conflicts. This all should have been made public and laid out in the Scoping, the DEIS, and now the SEIS process – so that a valid range of alternatives and analysis could occur. The SEIS still does not lay out basic information necessary to properly plan to protect and conserve public lands and imperiled species, so that BLM could tell the proponent: No, don't even consider a route in that area. Develop a range of alternatives using disturbed lands instead.	See our response to your similar comments above.
101611	(cxxvi)	KATIE FITE, WILDLANDS DEFENSE	A full analysis of the catastrophic habitat losses to the sagebrush biome as well as to western juniper - a potential target of the highly uncertain and potentially ecologically damaging "mitigation" involving scorched earth agency treatments and firebreaks in the region - must be provided. This must be done within a proper cumulative effects area for the entire segmented Gateway Project and B2H. This includes fire, exotic seedings, cheatgrass and now medusahead and Vulpia invasion, high density of livestock fences and facilities, high intensity of livestock grazing disturbance, high road densities, new and expanding weed invasion and weed site dominance including medusahead, rush skeleton weed, treatment impacts, expanding herbicide resistance and harms of herbicide use, etc.	See our response to your similar comments above.
101611	(cxxvii)	KATIE FITE, WILDLANDS DEFENSE	Revised and expanded analysis of the adverse impacts of potential linked or foreseeable development of new energy or other projects (wind, geothermal, fossil fuel, more transmission, nuclear energy, mining, communication towers, etc.) resulting from any potential route of the Gateway lines and B2H lines has not been provided. This is part of understanding the full range of connected, linked, and foreseeable actions, and the project's complete environmental footprint. Where are sites where potential or linked development is likely if the line is routed along any of the numbered alternative sections? To what degree will habitats be lost and fragmented further, and TES species decline or be extirpated altogether in habitats used by particular populations? This is necessary to understand if any mitigation is possible, the effectiveness of any mitigation, or the impossibility of adequately mitigating impacts of routes except by avoidance.	See our response to your similar comments above.
101611	(cxxviii)	KATIE FITE, WILDLANDS DEFENSE	BLM must fully explain why these lines, along with other existing proposed and foreseeable corridors, are needed. It seems to us that Gateway and B2H are part of a scramble for control of rights-of-way. They are both unneeded dinosaurs. Various large energy companies seem to each be trying to get their own lines - perhaps even speculating on rights-of-way for lines to be sold or traded in the future (like occurred with Idaho Power's SWIP, portions of which now have been developed in an environmentally harmful manner in Nevada). Certainly part of what is going on here is making sure that energy control remains in the hands of large corporations, and can be manipulated for profit and centralized, rather then de-centralized, in the future. This is not adequately examined in the Gateway or B2H documents. Instead, the SEIS is a morass of confusion. The project analysis is divorced from the rapidly changing smart grid, rooftop solar and the public's zeal for de-centralized and local renewable energy in contrast to remotely sited hugely destructive public lands energy developments.	See our response to your similar comments above.
101611	(cxxix)	KATIE FITE, WILDLANDS DEFENSE	Other potential large transmission projects may be linked to this project. They will also result in a proliferation of roading and other human disturbances. All of this must be fully analyzed in site-specific detail. While the SEIS presents maps, road issues, linked projects, and other matters are unresolved. The mapping only skims the surface in overlaying the biological and other conflicts of potential route segments, and the disturbance that would be required to impose the line. It is impossible to determine exactly where the line would run under each part of all alternatives. This is of great concern to local residents, as well as public lands enthusiasts.	See our response to your similar comments above.

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101611	(cxxx)	KATIE FITE, WILDLANDS DEFENSE	When WLD attended the Gateway public meeting in Hagerman this spring, we learned from concerned local residents that had raptors nesting on their property where it appeared the line would cross. The SEIS mapping of raptors on display ignored any consideration of this, and the analysis ignores serious impacts the confusing alternatives for the line might have on raptors and other sensitive species on private lands. Without an understanding of what habitats, nest sites, and populations the line and myriad associated disturbances ranging from roads to herbiciding may be impacting, the SEIS with all its heaps of Appendices and still uncertain and still unfinished development and mitigation plans, can not be considered a valid NEPA document.	See our response to your similar comments above.
101611	(cxxxi)	KATIE FITE, WILDLANDS DEFENSE	There is a destructive visual blight footprint from these ugly huge transmission lines, new roading, and other visual scars, intrusions, and blemishes on the landscape. On no part of the route is the full degree of open space, visual and aesthetic intrusion adequately analyzed or mitigated. These lines are very large, and they and the road networks will dominate the visual landscape. We strongly oppose granting ROWs for the Gateway Project where it conflicts with historic viewsheds or scenic and open space preservation. These lines create jarring and discordant visual contrasts in the West's wide open sagebrush and other landscapes. Micro-siting and mitigation measures will be greatly in adequate to protect the resources.	See our response to your similar comments above.
101611	(cxxxii)	KATIE FITE, WILDLANDS DEFENSE	We are greatly concerned about the potential avian and bat mortality due to collisions with the lines and/or guy wires, fencing, etc. We are chocked that necessary bird use and migration studies have been ignored, and that Idaho BLM has let Idaho Power get away with this. All wires (including transmission lines) of the line should be prominently marked with reflective or other highly visible material. This makes mitigating visual impacts even more difficult, but it must be done to try to reduce bird and bat injury and death. Why is this not the basis of alternative and mitigation actions? Such concerns have been in front of the Gateway preparers for many years.	See our response to your similar comments above.
101611	(cxxxiii)	KATIE FITE, WILDLANDS DEFENSE	We are very concerned the SEIS and B2H rely on future "micro-siting", as did the earlier eastern Gateway document. This conceals the exact path of the line from public review until after the ink is dry in the ROD. Full analysis necessary to understand how intrusive the line will be and the magnitude of its effects to native animals, viewsheds, trails, rare plants, neighbors. If mitigation by avoidance is necessary – it cannot be understood if the exact path remains a mystery until the bulldozers roar to blade roads for this huge project. The purpose of an EIS is to eliminate uncertainty, and conduct an upfront analysis so that necessary adaptive and protective actions can be taken, and proper mitigation applied – including mitigation by avoidance, or choosing a different path entirely, not building the project, or other actions. Putting off hard choices to last minute micro-siting thwarts NEPA's hard look requirement. It violates FLPMA's protections for public lands resources, as well. It blindsides the public due to damage to done to the environment, and angers neighbors.	See our response to your similar comments above.
101611	(cxxxiv)	KATIE FITE, WILDLANDS DEFENSE	No adequate map of access roads, project construction disturbance areas, etc. is provided so that informed comparisons of alternative segment impacts can be made, and NEPA's required "hard look" at alternatives taken. Is this because Idaho Power is afraid of what informed analysis might find? Or how many landowners might be riled up?	See our response to your similar comments above.

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101611	(cxxxv)	KATIE FITE, WILDLANDS DEFENSE	Bird migration routes and patterns (including areas where birds may be flying low under adverse weather conditions or at night) must be fully examined based on years of field work and radar data. Migration routes in the region traversed by Gateway and B2H are very poorly understood. When renewable energy project analyses (such as the greatly flawed China Mountain EIS) have been prepared, BLM had not required that industry consultants conduct necessary multi-year intensive radar and other studies necessary to understand the project's large-scale conflicts with migrating passerines, raptors, or bats, including during inclement weather when migrating birds may be downed. The Gateway line could open up new areas in the northern Jarbidge and elsewhere to deadly industrial wind development and even more powerline sprawl and other adverse impacts to volant and other species. Similarly, B2H may spawn wind development or other energy sprawl in SW Idaho and eastern Oreogn. Full study and analysis of migration routes must be provided for these projects as well as all other potential routes or segments. Radar data on migrants must be collected for many portions of the route. Adding even more transmission lines and access routes in areas like Hagerman would result in an even greater threat to migratory birds that already face great threats from the combination of existing lines and wind farm proliferation in the area. What is the existing density of transmission lines in this region? Or wind farms across Gateway's path? This EIS must provide detailed (and honest) analysis of the effects that existing lines and wind farms are having on many wildlife populations, - migratory bird populations, bats populations, etc. The impacts of Gateway (and any other foreseeable projects - such as renewable or other energy facilities these lines may spawn) on all sensitive biota populations must be analyzed.	See our response to your similar comments above.
101611	(cxxxvi)	KATIE FITE, WILDLANDS DEFENSE	There are many harmful impacts of energy structure development and of inappropriately sited industrial "renewable" wind, solar, geothermal or other energy projects that Gateway may spawn in Idaho, and B2H may spawn in Idaho and Oregon. Plus the serious adverse effects of the segmented eastern Idaho and Wyoming Gateway line, as well as linked and inter-connected industrial wind development in prime sage-grouse habitat in Wyoming or elsewhere must all be assessed as part of the cumulative effects analysis. The combined effects of industrial energy, transmission, and chronic abusive livestock grazing practices will very foreseeably cause even further reductions in sage-grouse, long-billed curlew and other migratory birds, and other wildlife populations leading to extirpation of these and other imperiled native biota. This industrial development will further disrupt movement and connectivity between habitats and wildlife populations. Even more development/energy sprawl spawned could result in a significant range perforation for sagebrush species of concern that are already undergoing significant declines.	See our response to your similar comments above.
101611	(cxxxvii)	KATIE FITE, WILDLANDS DEFENSE	Effects on animals may include the following behavioral and habitat use disruption from the newly discovered impact of UV light flashes: http://www.theguardian.com/environment/2014/mar/12/animals-powerlines-sky-wildlife Power lines are seen as glowing and flashing bands across the sky by many animals, research has revealed. The work suggests that the pylons and wires that stretch across many landscapes are having a worldwide impact on wildlife. Scientists knew many creatures avoid power lines but the reason why was mysterious as they are not impassable physical barriers. Now, a new understanding of just how many species can see the ultraviolet light – which is invisible to humans – has revealed the major visual impact of the power lines. "It was a big surprise but we now think the majority of animals can see UV light," said Professor Glen Jeffery, a vision expert at University College London. "There is no reason why this phenomenon is not occuring around the world." And: … the discovery has global significance: "The loss and fragmentation of habitat by infrastructure is the principle global threat to biodiversity – it is absolutely major. Roads have always got particular attention but this will push power lines right up the list of offenders." The avoidance of power lines can interfere with migration routes, breeding grounds and grazing for both animals and birds. And: Around the world, Tyler said: "There are hundred of examples of animals avoiding power lines. Now we know that, not only do these clear-cut corridors mean exposure to predators, at the same time there is this damn thing flashing at you." Full and detailed analysis of these effects, corona, electromagnetic fields and other adverse phenomena associated with powerlines must be assessed. ALL of the long-standing concerns raised many decades ago must also be assessed: http://pubs.usgs.gov/fwsobs/1978/0048/report.pdf Powerlines cause fatalities and injuries as birds and bats collide with them. Some species have higher mortality rates, and some are more biologically sensitive. Most birds that strike a powerline do not fall and die right under it. Impacts may vary seasonally, and during periods of inclement weather, night migrants attracted to lights, etc.	The EIS/SEIS state that powerlines can cause bird mortality. The analysis states that some species avoid transmission lines, the reasons vary. There is no definitive research that demonstrates the cause is UV light. There are likely many causes.

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			Note that even back in the 1970s, baseline studies were being done to determine relative effects of routes on birds (Klamath example – Should a line be sited in the path of 10,000 Ross's geese or 3 million pintails)? Sadly, Idaho Power despite a prolonged period of project development, has not collected adequate data to determine migration paths and effects. There are a very large number of impediments to avian migration all along the Snake River Plain, and now less trammeled areas will become hazards and barriers due to the Gateway unneeded line.	
101611	(cxxxviii)	KATIE FITE, WILDLANDS DEFENSE	High voltage lines and expanded human access and disturbance increase wildfire danger– including from increased flammable weeds that proliferate in areas of disturbance, from increased human intrusion of all types including vehicle/OHV use and potential catalytic converter and cigarette fires, target shooting on access routes, raptor electrocutions igniting wild land fires, and other mishaps. There is also fire risk from the lines. Transistors may cause fires, resulting in much more frequent fires. Full and detailed analysis of all of these factors must take place, including understandable analysis of the transistor and other line equipment types to be used, and their likelihood of causing fires. Equipment that minimizes fire risk must be evaluated and required.	See our response to your similar comments above.
101611	(cxxxix)	KATIE FITE, WILDLANDS DEFENSE	BLM often fails in controlling OHV use. Road closures are highly uncertain, and are very often unenforced. Several LUPs are woefully outdated. Cross-country use and road proliferation is allowed under them. Where is that the case here?	See our response to your similar comments above.
101611	(cxl)	KATIE FITE, WILDLANDS DEFENSE	Fires from raptor electrocutions have ignited grasses as electrocuted birds fell to the earth in southern Idaho. All of these risks must be considered. Any LUP amendments must include road/OHV closures in any new or upgraded roading caused by this project. Any upgraded roads must be returned to their original condition and restored. There is also serious concern about the effectiveness of restoration given BLM's failures to control livestock use and greatly ineffective rehab schemes that rely on aggressive weedy species, harmful techniques, and copious herbicide increasingly applied aerially with high potential for drift and collateral damage. We have already submitted information of concern about Soda Fire rehab efforts, to this process. We will be submitting additional information with these comments on failed rehab actions, Soda concerns, concerns with BLM Herbicide and Weed EAs and an old 17 States Veg/Weed EIS, and many other matters related to the inability of the agency to effectively rehab lands. All analysis must provide detailed comparative information about the characteristics of transistors and other components of the lines, and the likelihood of fire. http://www.cpuc.ca.gov/environment/info/aspen/sunrise/deir/apps/a01/App%201%20ASR%20z_Attm%201A-Fire%20Report.pdf Transmission lines located in areas with high fire risk and high occurrence of lightning strikes creates a reliability risk. Dense smoke from wildfires can "trip"1 a circuit, causing it to go out of service. Outages can result from emergency shut-downs during a nearby fire in order to prevent thermal damage to the line, to prevent a smoke-caused trip, or to meet the safety needs of firefighters. When a wildfire occurs very near a transmission line right-of-way, lines carried by steel towers are vulnerable to heat from wildfire. The conductors on both wood- and steel-carried transmission lines are susceptible to physical damage from the heat of a wildfire, and conductor damage is not repairable (conductors must be replaced). A fire can force the outage of a transmission circuit if it raises the ambient temperature of the air around the conductors above the line's operating parameters. Heavy smoke from a nearby wildfire can contaminate a transmission line's insulating medium, which is the air surrounding the conductor. Smoke can cause an outage. Ionized air in the smoke can become a conductor of electricity resulting in arcing between lines on a circuit or between a line and the ground. See also: http://solareis.anl.gov/documents/docs/APT_61117_EVS_TM_08_4.pdf	Raptor electrocutions are associated with distributor lines, not 500-kV transmission lines, as is noted in the EIS.
101611	(cxli)	KATIE FITE, WILDLANDS DEFENSE	Several of the various huge transmission/corridor processes are inter-related. The full picture of energy alternatives that site any power generating/transmission facilities much closer to urban areas, that focus on private land development of "renewables", and that focus on de-centralized energy and home or other solar generation and conservation – all must be fully explored. This should be contrasted with a corridor expansion across many areas of the across the Western Landscape, of which the Gateway and B2H EIS processes are a part. Part of the Energy sprawl that appears to be occurring is aimed at keeping a large corporate chokehold on centralized large-grid projects like this one. These large projects make it easier for very large power industry players or speculators to manipulate, control and raise prices on power – as occurred with the Enron scandal	Your comments on large corporations are noted. The BLM's purpose for this assessment is found in Chapter 1.

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101611	(cxlii)	KATIE FITE, WILDLANDS DEFENSE	There is increasing public concern over loans and other taxpayer subsidies energy projects are receiving. Have there been any federal loan subsidies for any portions of Gateway to date? Are any foreseeable for Gateway and B2H? Or potential linked energy developments?	Regulating federal loan subsidies are well beyond the scope of this analysis.
101611	(cxliii)	KATIE FITE, WILDLANDS DEFENSE	BLM must fully and clearly evaluate whether there is a need for the plethora of projects and corridor paths being proposed. It must explain why Gateway, even if needed, cannot just follow or hook into other areas, rather than destroying undeveloped areas such as scenic portions of Salmon Falls Canyon, the northern Jarbidge region, and other sites. BLM must provide detailed information and independent analysis of why Idaho Power cannot focus on conservation measures with its customers, develop a really good smart grid, and encourage rather than hinder and block rooftop solar, and rather than wasting power and resources through long-distance transmission. This destroys so many areas of public lands along with placing another lethal hazard to birds and bats across so much country. BLM must require an independent assessment of any so-called "need" for this project.	See our response to your similar comments above.
101611	(cxliv)	KATIE FITE, WILDLANDS DEFENSE	The project violates many of the siting considerations found here: http://solareis.anl.gov/documents/docs/APT_61117_EVS_TM_08_4.pdf This includes avoidance of sensitive areas, viewsheds, protected areas, etc. Instead Gateway (and B2H barrel right through numerous areas wit sensitive resources from rare plants to historic trails, with cumulative large-scale impacts that are not able to be mitigated.	See our response to your similar comments above.
101611	(cxlv)	KATIE FITE, WILDLANDS DEFENSE	How much energy will be required to build all parts of this line? What will the carbon/greenhouse gas emissions impact of the line be? Please provide all information – from import of steel from Asia to mining raw materials, to herbiciding weeds spawned by the project disturbance and impacts such as increased fires. Please also analyze how much power will be lost in transmission (for example from wind farms destroying sage-grouse habitat in Wyoming), and loss of the ability of wild public lands to buffer climate change adverse impacts that may result from Gateway and B2H and linked developments. What are is the magnitude of degradation and risks this poses? BLM cannot just take the proponent's word for a "need". Has the need and justification for this project changed over time? How? Has the hazardous mini-nuke siting at INL played into the Gateway project split line?	CO_2 emissions, which is one measure of energy use, is discussed in Section 3.20.2.3. Refer to the tables in that section for CO_2 emissions.
101611	(cxlvi)	KATIE FITE, WILDLANDS DEFENSE	BLM must critically examine the adverse effects, including promoting devastating habitat loss and fragmentation, large-scale visual pollution and blight of open space and relatively less trammeled landscapes, and other factors. BLM must fairly consider choosing No Action for Gateway West, B2H and other projects that would have such deleterious effects. BLM must require that a range of viable alternatives be considered, and not just a series of route segments that cannot be adequately mitigated. BLM must also analyze much stronger conservation measures, and alternatives that fully follow existing large transmission routes and/or the Interstate. This will reduce the project footprint and environmental damage.	See our response to your similar comments above.
101611	(cxlvii)	KATIE FITE, WILDLANDS DEFENSE	Please incorporate the full range of ecological concerns (such as habitat loss and fragmentation for native biota under all potential segments), and the tremendous ecological footprint of a host of likely linked developments. These range from powerlines to road networks that these projects would spawn, to potential wind, geothermal and solar development sprawl. Please also consider potential for facilitating oil and gas development, mining, and other industrial undertakings that further promote habitat loss.	See our response to your similar comments above.
101611	(cxlviii)	KATIE FITE, WILDLANDS DEFENSE	How could siting of "renewable" energy complexes potentially linked to this line alter localized weather and other patterns? We understand that vast areas of arid lands will be bladed/bulldozed – cleared of vegetation, paved and solar panels placed if solar energy is developed. This will certainly alter local winds, local temperatures, and have other effects. There has been discussion of more solar facilities being sited in Idaho. As public comment on the China Mountain Wind Farm several years ago showed, wild land wind farms have a massive impact on wildlife and migratory birds, a huge expanded roading impact/footprint, will interfere with windblown snow accumulation, and harm the ability of the site to support moisture-dependent vegetation communities as well as hydrological processes, and have an overall terribly harmful Footprint. How much power will be lost in the remote lands siting of energy projects that may tie into this line, vs. siting closer to metro areas and/or placing emphasis on local and more self-sufficient generation of solar and other power? How might local or self-sufficient generation of power alleviate or reduce rolling black-outs, and other effects of an overloaded centralized grid?	See our response to your similar comments above.

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101611	(cxlix)	KATIE FITE, WILDLANDS DEFENSE	Why was the DOE Corridor process even conducted, if additional mushrooming corridors, in relative proximity, can be obtained at any time? If distance separation is needed between various energy projects – what is a minimal and reasonable separation? The claimed "need" for separation is highly arbitrary, as Gateway and B2H clearly show. In fact, the SEIS (as discussed below) shows that in 2011 the criteria were changed. Yet Idaho Power does not seem to have taken this fully into account in developing alternatives for the original DEIS, and now only admits to it when reviewing proposed routes from the RAC studies.	See our response to your similar comments above.
101611	(cl)	KATIE FITE, WILDLANDS DEFENSE	The SEIS fails to take a hard look at "need" and consider an adequate range of alternatives, including those focused on locally generated and locally used power – instead of transport (and much associated loss of electrical power) across long-distances. Lines and linked energy development rip apart critical big game winter ranges, rare plant habitats, sensitive animal species habitats, loggerhead shrike habitats, cultural and historical sites, landscapes and ecosystems, sites critical to the integrity of a National Conservation Area, etc. They kill and injure volant species, and increase predation on many sensitive animals.	See our response to your similar comments above.
101611	(cli)	KATIE FITE, WILDLANDS DEFENSE	The SEIS is awash in confusing claims: "This SEIS identifies a Revised Proposed Action and new alternatives for Segments 8 and 9, which include design features and mitigation measures, developed in consideration of new information that became available after the FEIS and ROD were published. The SEIS supplements the analysis found in the FEIS with analysis of these new alternatives. The new information did not warrant reanalysis of the alternatives previously described in the FEIS". We object to the failure to reanalyze the alternatives previously described, especially since the BLM claims there is new information (yet never details this body of new information so an informed review of the previous alternatives or other potential routes could be conducted). "The SEIS identifies opportunities to mitigate the impacts of siting and building Segments 8 and 9, if a ROW is granted, by incorporating avoidance, minimization, and compensation measures with consideration of local and regional conditions. In addition, opportunities for enhancement of resources and values within the SRBOP are evaluated, in accordance with Public Law (P.L.) 103–64, the statute which established the SRBOP. Mitigation measures will be evaluated in the context of the magnitude of the potential effects of the Project". This is a serious concern because only a limited amount of info is used to determne the "value" of the site -often it is based merely on the vegetation present. This ignores the context of an open space area, proximity to other higher value habitats, importance for habitat connectivity, location in a migration zone, the site being the only relatively open or undeveloped space that wildlife may have in a fragmented landscape, proximity to essential nesting or other habitats and many other factors. This map from the Gateway public meeting shows how inadequate the mitigation scheme really is: [Photo] How does this scheme compare to the mitigation criteria being used in the eastern portion of Gateway, or that is likely to be applied in B2H?	Your objection to the SEIS not reanalyzing the original routes is noted. See Chapter 1 for an explanation of the purpose and need for this SEIS.
101611	(clii)	KATIE FITE, WILDLANDS DEFENSE	This greatly discounts the value of areas free from human disturbance for wildlife persistence in a fragmented landscape, no matter the vegetation type. Plus, this is much too simplified. Often there will be pockets of vegetation that may persist that provide crucial structural or other features. This also downplays proximity to raptor nests of project siting and disturbance, and other important dimensions to understanding the significance of a site to an animal's habitat use. We strongly oppose the use of this simplistic modeling that benefits Idaho Power at the expense of the region's wildlife. It downplays the importance of undeveloped lands undisturbed by powerlines in the context of this landscape where there is currently much human development already. It ignores proximity to higher value habitats and resources or landscape features that may comprise critical features of habitats.	See our response to your similar comments above.

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101611	(cliii)	KATIE FITE, WILDLANDS DEFENSE	It relegates sensitive species like long-billed curlew (a bird with seriously declining populations in Idaho and across the West), burrowing owl and others that have been able to persist in such lands to a state of lesser importance This violates the sensitive species policies and the respective Land Use Plans for the project footprint area. For example, it downplays the importance of ground squirrels as a raptor prey food, as in the Birds of Prey Area, since ground squirrels can survive to some degree in annual grasslands. So proximity of annual grassland to nesting cliffs may make the site of higher value. This is especially the case with the line path through the SRBOPA, where there are many raptor nest sites on the canyon cliffs. This much too simplistic model must be scrapped.	See our response to your similar comments above.
101611	(cliv)	KATIE FITE, WILDLANDS DEFENSE	Due to political blowback in Owyhee County, the project has been sited in the SRBOPA. However the full range of effects of this siting have not been assessed, minimized and mitigated. “Mitigation” that is being proposed is based on the “magnitude of potential effects”. There is a concern about the magnitude of effects are catalogued. Since Idaho Power has refused to study bird migration patterns, and the full range of biological values impacted; has failed to conduct current intensive site-specific surveys for some resources; has failed to examine the quality of the habitat altered and lost on private land and its value to the species as a whole as habitat so that the complete footprint of the project can be understood; due to the fact that Idaho Power still has not finalized the specific path of each segment of the line; and incomplete Appendices, plans and information - there is no way that the “magnitude of impacts” can be properly assessed.	See our response to your similar comments above.
101611	(clv)	KATIE FITE, WILDLANDS DEFENSE	It is impossible to understand WHY any second line proposed by Idaho Power simply does not go from Cedar Hill to Jerome and then along one of the existing lines across the SRP north of I-84, rather than blasting across Salmon Falls Creek and the northern Jarbidge. We reiterate that the 2011 change in siting proximity possibilities makes such routing much more feasible. The SEIS provides crucial information that should be used to develop a range of alternatives siting the project in existing corridors: “In December 2011, the WECC and the WECC Board of Directors relaxed its regional transmission planning criterion to allow a minimum separation of 250 feet from an existing line. This change became effective in April 2012. This change creates the possibility of constructing new transmission lines closer to existing lines, with subsequent possible changes in impacts to affected resources”. WHY then wasn’t that part of the original DEIS? Instead, Idaho Power kept insisting it needed much greater separation under political pressure resulted in a change in routing moving the line outside of areas of Owyhee County, and through the SRBOPA. This is a positive action: The Proponents have also indicated that it would be feasible to “double circuit” portions of Segment 9 with existing 138-kV transmission lines (i.e., install the new 500-kV and existing 138-kV lines on the same tower structures, along Baja Road and in the C.J. Strike Reservoir, both in the SRBOP). Co-locating the 500-kV and 138-kV lines on the same structures (i.e., double circuiting) could reduce the physical and visual footprint of the new lines.	See Section 2.3.1.4 for a discussion of the WECC criteria
101611	(clvi)	KATIE FITE, WILDLANDS DEFENSE	We are very concerned about the discussion of “compensatory mitigation”. We are very concerned at the data void on how mitigation has been applied in the eastern area of Gateway that has already been authorized, and what mitigation funds have been spent on there, and the effectiveness of that mitigation effort. Where, when and how was it applied? What have the results been? The SEIS states: Segments 8 and 9, as currently proposed by the Proponents, would require amendment of one or more BLM land use plans, including the Twin Falls Management Framework Plan (MFP), the 1987 Jarbidge Resource Management Plan (RMP)1, the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) RMP, the Bennett Hills/Timmerman Hills MFP, and the Kuna MFP. The Proponents also submitted a portfolio of proposed mitigation measures and other measures focused on enhancing resources and values in the SRBOP, known as the MEP (see Appendix C).	See our response to your similar comments above.

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101611	(clvii)	KATIE FITE, WILDLANDS DEFENSE	The SEIS "incorporates by reference" the analysis related to Segments 8 and 9 included in the Gateway West 2013 FEIS. Here, BLM makes it extremely difficult to understand the differences between alternatives. Plus BLM ignores significant changed circumstances and current science in turning a blind eye to assessment of all alternatives. The revised Proposed Route for Segment 8 begins at the existing Midpoint Substation and continues west past the communities of Hammett and Mountain Home. It diverges from the Proposed Route considered in the FEIS near milepost (MP) 97.7, northwest of Mountain Home. The revised Proposed Route then parallels the existing 500-kV transmission line at a distance of 250 feet for the remaining distance (30 miles) into the Hemingway Substation. Approximately 22.9 miles of the revised Proposed Route for Segment 8 would be within the SRBOP. PART of the impacts of the particular segment of the proposed route are assessed in a 2016 context, and parts years ago. This is madness. Page 1-6, for example, is simply incomprehensible. The tactic of the SEIS preparers appears to be to generate a cloud of confusion so readers give up in trying to understand effects. The public is supposed to be able to understand NEPA documents. The SEIS "identifies seven new action alternatives, each of which is a combination of one route from Segment 8 and one from Segment 9. In addition, the BLM has identified two of the seven alternatives as the Co-Preferred Alternatives". This is a jumble of confusion, including of separate analyses of segments of routes.	See our response to your similar comments above.
101611	(clviii)	KATIE FITE, WILDLANDS DEFENSE	1.2.4 The Proponents' Draft Mitigation and Enhancement Portfolio The SRBOP enabling statute (P.L. 103-64) requires that the "Secretary shall allow only such uses of lands in the conservation area as the Secretary determines will further the purposes for which the Conservation Area is established." The BLM must demonstrate that any proposed use within the SRBOP meets the purpose for which the SRBOP was established. Congress established the SRBOP in relevant part "to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area" (Section 3(a)(2) of P.L. 103-64 [1993]). The BLM, thus, must demonstrate that the proposed ROW for the transmission line that would use portions of the SRBOP would meet the established purposes, and enhance SRBOP resources and values. The siting of the line conflicts with meeting the established purposes of conservation, protection and enhancement of numerous SRBOPA biotic, historical, cultural and other resources. It does not enhance resources and values. More unmarked wires = more bird and bat collisions, and the line itself and disturbance, electromagnetic fields, flashes, lighting, etc. pose potentially even a greater "barrier" to many species of wildlife. Wildlife may be be displaced to less favorable areas.	See our response to your similar comments above.
101611	(clix)	KATIE FITE, WILDLANDS DEFENSE	The MEP is outdated, limited and greatly inadequate. It fails to recognize the extreme difficulty of rehab or often futile efforts to "replace" habitats in this arid landscape. It is based on minimizing the amount and type of mitigation, and uses old and outdated scientific information in a highly uncertain manner. The Proponents have developed an MEP (August 2014) aimed at offsetting impacts to resources and values and enhancing the resources and values found in the SRBOP (Appendix C). The Proponents' MEP includes both compensatory and enhancement components to address Project-related impacts on the SRBOP (note that the MEP is considered as a design feature of the proposal; The proposed compensatory measures are intended to address the effects that persist after standard avoidance, minimization, and mitigation measures have been implemented. The Proponents' intent for these measures is to return an impacted area to baseline conditions. The new line has myriad environmental effects that are not limited to just the specific disturbed or bladed land area, or the exact point in space where the wires are. MEP "enhancement measures" include: 1) habitat restoration, 2) purchasing private inholdings within the SRBOP; 3) improved funding of law enforcement, 4) funding for visitor services, and 5) removal of existing powerlines within the SRBOP.	See our response to your similar comments above.

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101611	(clx)	KATIE FITE, WILDLANDS DEFENSE	Purchase and retirement of grazing permits must be fully considered, and Land Use Plans must allow retirement of grazing allotments. Commitments must be made to restore lands to the maximum extent possible using native species. ALL potential slickspot peppergrass habitat, for example, should undergo livestock grazing retirement. Where is all potential and occupied slickspot peppergrass habitat located? What is the habitat quality? What is the status of pollinator populations? How large an area is it necessary to recover pollinator plants and populations over to sustain a viable population of slickspot peppergrass?	See our response to your similar comments above.
101611	(clxi)	KATIE FITE, WILDLANDS DEFENSE	BLM Manual 6280 provides policies for the management of National Scenic and Historic Trails. BLM recently issued guidance on mitigation in a Regional Mitigation Manual (BLM 2013c) to implement Secretarial Order 3330 (October 31, 2013)	This is stated in the SEIS, see Section 3.1 and Appendix J in the SEIS for an analysis of NHTs that complies with the new manual.
101611	(clxii)	KATIE FITE, WILDLANDS DEFENSE	The SEIS refers to the new Jarbidge RMP. It states that the old RMP still applies to lands now within the Four Rivers FO that previously had been in the Jarbidge. This document is heavily laden with provisions that benefit commodity and energy interests, and is likely to be challenged. The very high levels of livestock use and harmful manner of use under the RMP must be considered as serious adverse cumulative imapcts to the sensitive species in the Gateway region, for example. In fact, there is already one environmental lawsuit – over BLM's proposals to greatly impact the wild horse herd while allowing high levels of livestock grazing to take place. We are greatly concerned at the downgraded ACEC, visual and other protections in order to accommodate Gateway. Example: Class 2 downgraded to Class 3 to accommodate Gateway and potential future raptor and migratory bird killing industrial wind farms. BLM also references the GRSG RMPA amendment ROD for the Great Basin. The ROD did not change the other requirements of the affected RMPs. The 2015 Jarbidge RMP ROD states https://eplanning.blm.gov/epl-front-office/projects/lup/36856/62721/67973/05_Record_of_Decision.pdf : "In the ACEC section, minor corrections were made to ACEC-O-3 ACEC-MA-18, and ACEC-MA-38. Objective ACEC-O-3 to the Salmon Falls Creek ACEC removed the words "including prairie falcons and spotted bats" because prairie falcons are no longer a special status species and no example of special status wildlife was needed. It previously stated "Protect scenic values, redband trout habitat, golden eagle nests, special status wildlife including prairie falcons and spotted bats, and native vegetation communities." It now states "Protect scenic values, redband trout habitat, golden eagle nests, special status wildlife, and native vegetation communities." So the BLM stripped prairie falcon protections, but still acknowledged there are sensitive species protections. BLM has greatly failed to ensure protection of the It has also failed ot protect scenic values relevant and important species values. The JROD also states: Where will energy development be allowed? Energy development will be allowed in the planning area, except in the following ROW exclusion areas: the Bruneau-Jarbidge Rivers Wilderness, Lower Salmon Falls Creek WSA, and Sand Point ACEC. In the following avoidance areas, ROWs will be allowed in accordance with stipulations found in LA-A-3: areas within US Air Force Military Operating Areas; the Oregon NHT protective zone; the Kelton and Toana Freight Road protective corridors; eligible, suitable, and designated Wild and Scenic River corridors; the Upper Bruneau Canyon and Salmon Falls Creek ACECs; and the sage-grouse management area. This line should not be allowed in these areas – it is an energy infrastructure project/development. Also, the JRMP established an NHT protective zone, and it is very unclear the degree to which Gateway may violate this protective zone designation. We strongly oppose the VRM amendment, and the shoddy and incomplete analysis in SEIS Appendix G. Any amendment should change the Class to VRM 1, not strip protections to III which is nearly any gross intrusion can take place. Besides, Gateway can not meet even the VRM II standards. There is nothing "moderate" about the shocking, jarring and ugly visual effects of a huge transmission line.	Your comments on the Jarbidge RMP are noted.

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101611	(clxiii)	KATIE FITE, WILDLANDS DEFENSE	The claim that ANY of this could be shoe-horned into VRM 3 is absurd: For the purpose of this study, the following approaches were used: The location of a route across VRM Class III is consistent with the class objectives if consideration was given to route alignments that would avoid the area and feasible mitigation was applied. It was determined that the Revised Proposed Routes and the other routes considered in this Draft SEIS would comply with VRM Class III; however, additional existing condition influences resulted in one instance of changing the VRM to Class IV. Appendix G. Statements like this are blatantly false: During transmission line siting, VRM Class I and Class II lands were avoided where possible. Time after time there was no avoidance. Idaho Power refused to properly bundle lines, and stick to established corridors, BLM cannot allow this project to be authorized given the failure of the proponent to exercise proper and responsible avoidance, and the continued failure to provide complete baseline information, analysis and mitigation and other plans.	Your comments on VRM III are noted. See the extensive VRM analysis in Section 3.2 and Appendix G.
101611	(clxiv)	KATIE FITE, WILDLANDS DEFENSE	BLM is allowing Idaho Power to rely too much on old analysis: The analysis in this SEIS addresses only the portions of the Project related to Segments 8 and 9. It incorporates by reference the analysis found in the 2013 FEIS regarding Project-wide impacts. The BLM is considering several factors, including the proposed construction schedule, other authorizing entities' potential routes, environmental effects of the analyzed routes, and opportunities to reach complementary siting decisions with other authorizing entities in deciding whether or not to authorize the Project on public land.	Idaho Power is not doing this analysis, BLM is. Idaho Power is a proponent, not an author or even a cooperator in the analysis.
101611	(clxv)	KATIE FITE, WILDLANDS DEFENSE	The USACEC permitting is quite confusing: An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purpose. In addition, where a discharge is proposed for a special aquatic site (wetland), all practicable alternatives to the proposed discharge which do not involve a discharge into a special aquatic site are presumed to have less adverse impact on the aquatic ecosystem, unless clearly demonstrated otherwise. The project must rely on "all practicable measures" to minimize harm. It is a significant concern that micro-siting details are not yet worked out. This project must obtain a site specific permit, and can not be shoe-horned in under a Nation-wide permit, given the high degree of uncertainty and continued obfuscation about the exact location of the line and all associated construction and disturbance activities. THIS justification appears to be based on old and outdated information and projected analyses, as is the entire SEIS analysis:	Your confusion with USACE permitting processes is noted.
101611	(clxvi)	KATIE FITE, WILDLANDS DEFENSE	Idaho Power is obligated to expand its transmission system to provide requested firm transmission service, and to construct and place in service sufficient capacity to reliably deliver resources to network and native load customers. Idaho Power could take an immense step towards this if it would stop fighting and throwing up hurdles to rooftop solar and individual generation of electricity, or to fitting industrial facility roofs with solar panels or a whole host of alternative energy actions rather than this old, broken and environmentally harmful model of remote sited energy production and giant energy-losing and transmission lines. This would also result in much greater energy security. Facilitating rather than hindering home and work place siting of renewable energy would greatly facilitate and "reliably serve" the public, provide jobs in installation and maintenance, and save Idaho Power customers money. Instead, the company has already jacked up rates, apparently to help pay for its outmoded "dinosaurs" of transmission lines.	Your comments on the cost increases, rooftop solar, BPA power swaps, etc. are noted. BLM is not analyzing these issues. It is responding to an application to cross federal land from the proponents. See the Purpose and Need statement in Chapter 1.

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101611	(clxvii)	KATIE FITE, WILDLANDS DEFENSE	While the SEIS claims this monstrous project would "reduce the cost of delivered power", everyone's power bills just went up a considerable amount 3% or more). This is likely only the start, as the public gets gouged and has to pay for this dinosaur of a project designed to keep Idaho Power rolling in profits, and energy centralized and much less secure. We are very concerned about cronyism and potential corruption in Idaho state regulation and oversight of project activities. There is a very large recent track record of illegal or wasteful actions by the state. This interjects a high level; of uncertainty. Rooftop solar and decentralized energy projects fit the NERC/WEC standards to a "t". Gateway does not. The SEIS states: By 2017, BPA must come up with another source of power for its six small utility clients in Southeast Idaho. Well, alternatives that must considered include decentralized rooftop solar, and/or development of a small energy "farms" on ag land by each of these communities. What is an asset swap? BPA is considering five alternatives to provide that power: • Power purchase with OATT Service • B2H with OATT service • B2H with transmission asset swaps • Two BPA construction scenarios from Montana to Southeast Idaho. The second alternative depends upon the capacity of Gateway West through Idaho as well as on the completion of B2H.	See the response to your previous comment.
101611	(clxviii)	KATIE FITE, WILDLANDS DEFENSE	It is claimed that Gateway West is independent of, and would be built regardless of, any particular new generation project. The transmission grid of which it would become a part can be thought of in terms of hub and spokes, with a backbone connecting to the hubs. It would "improve" profiteering and promote industrial sprawl. Segments 8 and 9 would provide two separate paths connecting the Midpoint and Hemingway Substations. This link would improve the Proponents' ability to move power both east and west into their service areas in Idaho and Oregon. A single line, or two lines north of I-84 could do this just fine. There are hardly any customers all along much of the southern route. So unless the purpose of the southern route is to open the floodgates of large-scale energy or other development on public lands in the southern region, there is no need for it.	See the discussion on the Proponents' objectives and on reliability concerns in Chapter 1.
101611	(clxix)	KATIE FITE, WILDLANDS DEFENSE	Table 1.5.1 presents numerous requirements and permits. But how can this be adequately undertaken until full current science-based analysis is undertaken?	In general, the proponent would apply for the permits after the BLM selects a route across federal land. Therefore, the information in this analysis would be available to the agencies and governments considering the permit applications.
101611	(clxx)	KATIE FITE, WILDLANDS DEFENSE	The easements and ROWS that would be provided violate the NTSA Act in the following way: The National Trails Systems Act (NTSA) of 1968, as amended, established a network of scenic, historic, and recreational trails to provide for outdoor recreation needs; promote the enjoyment, appreciation, and preservation of open-air, outdoor areas, and historic resources; and encourage public access and citizen involvement. According to the NTSA of 1968, the Secretary charged with administration of the NHT may permit other uses along the trail provided that they do not "substantially interfere with the nature and purpose of the trail" (16 U.S.C. § 1246). There is already tremendous encroachment on the visual and aesthetic setting and locale of Trails. Please identify all existing areas where viewsheds are minimally impacted by development, and identify how this project will change these conditions. The full cumulative effects, including of eastern Gateway West, and foreseeable B2H impacts on other trail areas, must be fully revealed	As noted in the comment, it is up to the Secretary, or person delegated with this responsibility by the Secretary, to make this determination. The analysis in the EIS will be one of the sources used in that determination.
101611	(clxxi)	KATIE FITE, WILDLANDS DEFENSE	NRHP We are very concerned that consultation, avoidance and minimization of project impacts necessary to adequately protect irreplaceable cultural and historic resources is not adequate. BLM fails to: • Describe the values, characteristics, and settings of trails under study and trails recommended as suitable in the affected environment section of the NEPA document; • Analyze and describe any impacts of the proposed action on the values, characteristics, and settings of trails under study or trails recommended as suitable; and • Consider an alternative that would avoid adverse impacts to the values, characteristics, and settings of the trail under study or recommended as suitable and/or incorporate and consider applying design features to avoid adverse impacts.	Your concerns are noted. See the detailed analysis of NHTs in Section 3.1 and Appendix J.

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101611	(clxxii)	KATIE FITE, WILDLANDS DEFENSE	FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (7) "management be on the basis of multiple use and sustained yield unless otherwise specified by law"; (8) "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values."… 1.5.2.5 BLM Manual 6400 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, Planning, and Management. Manual 6400 states: To the extent possible under existing legal authorities (e.g., FLPMA, Clean Water Act, Endangered Species Act, and Archaeological Resources Protection Act), the BLM's policy goal for eligible and suitable rivers is to manage their free-flowing condition, water quality, tentative classification, and any outstandingly remarkable values to assure a decision on suitability can be made for eligible rivers... For BLM-identified eligible and suitable rivers, the BLM should consider exercising its discretion to deny applications for right-of-way grants if the BLM determines through appropriate environmental analysis that the right-of-way proposal is not compatible with the river's classification and the protection and enhancement of river values. Where the right-of-way proposal is found to be compatible, additional or new facilities should be located, to the greatest extent possible, to share, parallel, or adjoin an existing right-of-way. Well, then, here is an illustration of how badly Gateway violates FLPMA. The line should not be placed across Salmon Falls Creek. A change was snuck in at the last minute in a western segment of the eastern portion of Gateway. Prairie Falcon Audubon has long been expressing deep concern about this inexplicable change. Please see their comments on the SEIS. Gateway would impair, degrade and permanently alter the aesthetic, scenic and biological values of Salmon Falls Creek. With increasing development, open space lands and undeveloped wild river areas have become ever more scarce in this region. The public places high value on wild open space areas. Lines will also kill and injure birds and bats in area of the proposed Salmon Falls Creek crossing. Yet those impacts have not been adequately studied. This crossing maximizes impacts, and cannot be adequately mitigated. There is no "replacement" landscape. Mitigation by AVOIDANCE must be employed. There is simply no need for the line here, as there are clear alternatives that follow existing lines and/or disturbed corridor areas. Again, Idaho Power, must work with other utility line owners and bundle, co-locate, and locate on the same existing structures. This is especially the case since the 2011 overall change in siting distance.	The BLM can only approve a project if it meets all laws.
101611	(clxxiii)	KATIE FITE, WILDLANDS DEFENSE	In October 2015, the DOI released Manual 600 DM 6, Implementing Mitigation at the Landscape-scale (DOI 2015), which also implements landscape-scale mitigation for impacts from projects. The mitigation guidance states that "compensatory mitigation means to compensate for remaining unavoidable impacts after all appropriate and practicable avoidance and minimization measures have been applied, by replacing or providing substitute resources, or environments." The SEIS also refers to BLM interim guidance. HOW does compensatory mitigation compare to mitigation by avoidance? In areas where habitat is at a premium, or of high quality, its destruction with Gateway, B2H, etc. often cannot be effectively mitigated. WHAT happens then? The new Mitigation Memo instructs agencies to consider the extent to which the beneficial environmental outcomes that will be achieved are demonstrably new and would not have occurred in the absence of mitigation (i.e., additionally). It also calls for mitigation to provide for improvement of mitigation sites and be durable, transparent, monitored, and adaptively managed. We are very concerned that harmful uses may continue on any lands acquired and/or conservation easements. For example, if BLM acquires private lands or conservation easements in the SRBOPA or elsewhere, will it continue to allow grazing or other degrading or disturbing uses to continue?	Refer to Appendix K in the FSEIS for an expanded discussion of mitigation.
101611	(clxxiv)	KATIE FITE, WILDLANDS DEFENSE	Idaho Power attempts to rely on an old and out-dated analysis that does not adequately reflect the current plight and endangerment of LEPA. For example, BLM has likely doomed the LEPA populations north I-84 with its extensive forage kochia and livestock forage seedings in the "Paradigm" fuelbreaks projects. Forage kochia is an aggressive invasive weedy species that takes over slickspots. Ecologists have begged BLM to stop using it. Because it can withstand severe livestock abuse, and cows eat it, ecologists get ignored.	In Management Area 1 (which is where LEPA occurs), the use of forage kochia as a fuel break is not recommended because of the provisions within the slickspot peppergrass 20014 Conservation Agreement that stipulates a 1.5-mile buffer around LEPA EOs. It is recommended other species be used for fuel breaks in MA 1.

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101611	(clxxv)	KATIE FITE, WILDLANDS DEFENSE	Forage kochia is being strewn across the landscape in southern Idaho and the West, with no way to control its weedy future expansion. See Soda Fire scientists letter. Native plants do not recover in areas where forage kochia is seeded. It forms monocultures, It aggressively invades slickspots The Soda Fire "Rehab" and fuelbreaks pose a serious new threat –through use of forage kochia and expansion of weeds while at the same time further fragmenting and destroying habitats. See for example: Forage kochia http://missoulanews.bigskypress.com/IndyBlog/archives/2013/09/12/western-native-plant-societies-urge-usda-to-ban-exotics Native plant societies scientists urge BLM to ban use of forage kochia due to its weedy characteristics. https://ir.library.oregonstate.edu/xmlui/bitstream/handle/1957/21689/GrayErinC2011.pdf?sequence=3 Erin Gray M. S. Thesis. "An evaluation of the invasion potential of forage kochia (Kochia prostrate) in southwestern Idaho", USA. 2011."Kochia prostrata spread to unseeded areas on 89 % of sampled sites; distances of the farthest individual from the seeding boundary were greater than those previously reported, ranging from 0 to 710 m, with a mean distance of 208 m. Further, while spread increased with time since seeding, it was apparently independent of the composition of communities into which spread occurred". The 2013 Biological Opinion is now seriously out-dated. Political pressure is preventing USFWS from listing slickspot peppergrass. The SEIS states: The Biological Assessment (BA) prepared for this Project identifies the nature and extent of impacts and addresses avoidance, minimization, and mitigation measures to reduce potential impacts. The USFWS published their final BO for the Project, as well as their Conference Opinion for slickspot peppergrass, on September 12, 2013. Under no conditions should Idaho Power use or fund forage kochia in any rehab efforts or claimed "mitigation" activity in any way associated with Gateway and/or B2H. Only local native ecotype plants should be used in all rehab and/or mitigation efforts. They are best adapted to the local site, and native plants support native pollinators. Crested and Siberian wheatgrasses and other exotic grasses also should not be used in rehab. They are aggressive, out-compete natives, and because they can withstand grazing and grow big and coarse, livestock trampling and other impacts are perpetuated or even intensified once these species are seeded. Lands become sacrificed to the livestock industry, and written off by BLM as habitat of importance. Crested/Siberian Wheatgrass and Rehab Harms concerns include: https://www.hcn.org/blogs/range/fighting-a-pervasive-invader-crested-wheatgrass http://cdn.harmonyapp.com/assets/50ad0499dabe9d4a85006a0c/OGCWheatgrass.pdf http://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=1727&context=nrei Crested wheatgrass invades native habitats and outcompetes native species. It reduces native plant diversity. As an example of harms, the profligate Soda Fire "Rehab" seeding of exotic wheatgrasses threatens the native vegetation community habitat components and recovery of components essential for several sensitive species impacted by Gateway and B2H.. Studies at INL show concerns about the "weediness" of crested wheatgrass: http://www.gsseser.com/PDF/LTVReport2013.pdf This describes long-term documentation of invasion of crested wheatgrass into areas previously occupied by native sagebrush steppe plant communities in the absence of obvious disturbance. Concerns about the BLM's Soda Fire Rehab, herbicide use, and other BLM activities continue to mount: http://www.thewildlifenews.com/wp-content/uploads/2016/05/SodaFireReport_WithPhotos_Modif24April2016.pdf The failure of use of crested wheatgrass and rehab efforts in general for wildlife in chronically grazed landscapes is shown in this study of past BLM fire rehabs: http://onlinelibrary.wiley.com/doi/10.1890/ES13-00278.1/abstract Robert S. Arkle, David S. Pilliod, Steven E. Hanser, Matthew L. Brooks, Jeanne C. Chambers, James B. Grace, Kevin C. Knutson, David A. Pyke, Justin L. Welty, Troy A. Wirth. Quantifying restoration effectiveness using multi-scale habitat models: implications for sage-grouse in the Great Basin. Ecosphere, 2014; 5 (3): art31 DOI: 10.1890/ES13-00278.1 All of this maximizes uncertainty, and undermines BLM claims of the magnitude and severity of impacts, and whether mitigation is taking place.	See the previous response.

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101611	(clxxvi)	KATIE FITE, WILDLANDS DEFENSE	Portions of the route north of the Snake River would affect slickspot peppergrass. Since access route and new and expanded roading maps and exact locations of the line have not been provided, it is impossible to understand the degree and severity of impacts – which are likely to be very significant. New and expanded weeds, increased wildfire risk, and many other threats and adverse impacts are likely. Construction of the line and roading will result in additional altered hydrology, small depressions, ruts – and puddles. Puddles that collect water increase livestock concentration and adverse impacts – especially the very harmful trampling impacts. Detailed plans must be provided, and the full degree of impacts examined.	Please refer to the environmental protection measures for this species in Section 3.7 of the FSEIS.
101611	(clxxvii)	KATIE FITE, WILDLANDS DEFENSE	Maps available at the public meeting show that an alternative heading north from Cedar Hill must be considered. This is made even more practical now since Idaho Power has admitted it can bundle lines much closer, and/or co-site.	See the discussion of alternatives not considered in detail in Chapter 2.
101611	(clxxviii)	KATIE FITE, WILDLANDS DEFENSE	We strongly oppose any southern routing of Gateway west of Cedar Hill and Castleford due to the large number of sage-grouse leks in relative proximity, and other values that are likely to be lost once a new precedent-setting route is pioneered here and Land Use Plan protections are stripped.	Your opposition to routes west of Castleford is noted.
101611	(clxxix)	KATIE FITE, WILDLANDS DEFENSE	The SEIS states: The BLM will continue to consult with the USFWS regarding the Project's compliance with both the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. While it is nice consultation is taking place, we again repeat that necessary baseline surveys have not been conducted for avian migration pathways, the serious impacts of the proliferation of wind farms and powerlines in the region on local and regional populations, flyways, wintering habitats, the actual occupancy of habitats in the path of all alternatives by migratory birds and sensitive species and many other effects and concerns.	See the response to your similar comment on the need for additional surveys above.
101611	(clxxx)	KATIE FITE, WILDLANDS DEFENSE	Adverse line construction and operation impacts to residents, wildlife, rare plants, pollinators and other biota include potential hazards from herbicide use and drift in wind and water, along huge disturbed corridors and the disturbance associated with the development that will be spawned. There are also toxic materials associated with energy facilities, pollutants associated with linked/facilitated coal plants and other development. There is potential for spills or leakage of all manner of nasty chemicals ranging from PCBs to chemical solvents; for ground and surface water contamination from materials/substances transported, used or spilled/leaked; or chemicals that may contaminate water used or "run-through" or re-injected in association with geothermal or other development that may be spawned by Gateway. There will also be cumulative impacts of herbicides and chemicals used with roadways, along the line, in adjacent ag lands, with ancillary facilities, etc. The Gateway road and other rights-of-ways, the public lands grazing disturbance footprint, and extensive private land disturbance often overlap. BLM is also proposing to radically increase aerial herbicide use, posing an even greater threat to native biota, recreationalists, and human residents. See WLD Comments on Vale and Boise District Weed EAs and Soda Fire appeal.	Cumulative effects from this project and other projects and developments, including herbicide use, are discussed in Chapter 4
101611	(clxxxi)	KATIE FITE, WILDLANDS DEFENSE	There must be consideration of removal or reduction in livestock AUMs across the entire public lands path as mitigation. Please require that project proponents set aside significant sums for purchase of private lands with important biological values, as well as for purchase of public lands grazing permits and permanent permit retirement for the specific region where the corridor or linked new development is located. This EIS should amend Land Use Plans to authorize such retirement, in order to aid in effective site rehab and mitigation. Understanding the current ecological health of all public lands grazing allotments in and near all potential routes and segments is necessary in order to conduct a valid NEPA analysis of all the direct, indirect, cumulative, and additive/synergistic adverse effects of chronic grazing disturbance to the values threatened by Gateway. It is necessary to understand the effects of the additional disturbance associated with the project, which may be more likely to result in new and persistent invasive species problems in landscapes already degraded and disturbed by livestock, and thus "primed" for weed and biological impoverishment invasions. See Fleischner (1994), Belsky and Gelbard (2000), Gelbard and Belnap 2003, Chuong et al. 2015. Grazing makes rehab less durable.	See the responses to your comments on grazing above.

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101611	(clxxxii)	KATIE FITE, WILDLANDS DEFENSE	The EIS does not adequately address the effects on public lands of this tremendous new disturbance on top of the adverse effects of habitat degradation, loss and fragmentation caused by livestock grazing and facilities, and often linked wildfire, roading, agency forage and vegetation "treatments" and other disturbances. Please see Fleischner (1994), Belsky et al. 1999, Belsky and Gelbard 2000, USDI BLM 2001 Belnap et al. Technical Bulletin on microbiotic crusts, Connelly et al (2004), Knick and Connelly (2009) Studies in Avian Biology, March 2010 USFWS Federal Register Warranted But Precluded Finding for Greater sage-grouse, Reisner et al. 2013, Reisner Dissertation 2010 (on cd). Manier et al. 2013 http://pubs.usgs.gov/of/2013/1098/ , Coates et al. 2016 https://www2.usgs.gov/newsroom/article.asp?ID=4463 Beschta et al. 2012, 2014 and Chuong et l 2015 to understand just some of the broad array of adverse impacts from livestock grazing disturbance that chronically occurs across many portions of any potential route and the linked development that would be spawned. See also Jablonski et al. 2014 describing higher levels of stress hormones in sage-grouse in grazed habitats, and Coates et al. 2016 describing increased presence of sage-grouse nest and egg predators when livestock are present. Further, U.S. Interior Department "State of the Birds" reports on bird numbers in the U.S. show continued declines in the region.	See the responses to your comments on grazing above.
101611	(clxxxiii)	KATIE FITE, WILDLANDS DEFENSE	How will it be possible to rehab disturbed lands (soils, microbiotic crusts, native vegetation communities, fragile sagebrush sites) faced with continued chronic grazing disturbance? There is no annual monitoring, Ecological Site Inventory, Rangeland Health, allotment evaluation, lentic or lotic PFC monitoring, or examination of condition of habitat components or watersheds or other data essential to understand the current condition of the lands and watersheds that Gateway potential routes, potential mitigation projects (including potential "treatment" deforestation or so-called "fuelbreaks" and overall project Footprint would impact. Please see Soda Fire scientists letters and Report on the Soda Fire, for example, describing BLM Rehab method impact concerns. http://www.idahostatesman.com/news/local/news-columns-blogs/letters-from-the-west/article77460047.html http://www.counterpunch.org/2016/03/22/owyhee-soda-fire-blms-67-million-dollar-rehab-reaction/, http://www.counterpunch.org/2016/04/27/toxic-range-the-blms-growing-chemical-addiction/ http://www.thewildlifenews.com/2016/05/10/soda-fire-recovery-not-going-as-well-as-portrayed-in-the-media/ http://www.thewildlifenews.com/wp-content/uploads/2016/05/SodaFireReport_WithPhotos_Modif24April2016.pdf Livestock Grazing and Weeds http://oregonstate.edu/ua/ncs/archives/2013/may/land-management-options-outlined-address-cheatgrass-invasion Hempy-Meyer and Pyke 2008. http://fresc.usgs.gov/products/ProductDetails.aspx?ProductNumber=1667 Full consideration of these factors is necessary to understand both indirect and cumulative impacts, as well the feasibility or likelihood of any rehab of disturbance being successful, risk of weed invasions with disturbance, and impacts of current chronic grazing disturbance and degradation stressors on sage grouse and other habitats. Current science on the very long disturbance interval of many arid sagebrush and other communities must be provided. See Knick and Connelly (2009), for example.	Please see Appendix K in the FSEIS for a discussion of habitat restoration methods.

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101611	(clxxxiv)	KATIE FITE, WILDLANDS DEFENSE	There is no baseline information provided on the existing livestock facilities, water hauling, sheep camp and herding operations, etc. that serve to degrade or fragment essential species habitat components across the Corridor and surrounding landscape, and their impacts. This includes livestock fences, water developments (water pipelines and troughs, wells), water haul sites, sheep campsites, salting/supplement feeding sites, etc. – all of which may significantly impair ecological processes, and have spawned an extensive road network over time and are also deleteriously affecting sage grouse, pygmy rabbit and other important and sensitive species habitats. Fleischner (1994), Frelich (2003), Connelly et al. 2004, Knick and Connelly 2009, Manier et al. 2013, Jablonski et al. 2014, Coates et al. 2016. Data must be compiled to understand the impacts of additional fencing, roading, potentially expanded pumped livestock water sources (once electricity is available in remote sites), and other development that the powerline and linked wild land industrial development sprawl that may take place. There is not adequate mitigation and no required mandatory action associated with this EIS to adequately address the deleterious effects of this powerline, transformer stations, expanded roading, and all disturbances associated with construction, operation and de-commissioning. This will be amplified by livestock degradation of the corridor area and its surrounding areas where development will be promoted. This is essential to understand, because any disturbance effects of livestock grazing are likely to be exacerbated by global warming processes.	See the responses to your similar comments above.
101611	(clxxxv)	KATIE FITE, WILDLANDS DEFENSE	Global warming is increasing cheatgrass and other invasive species problems resulting from livestock disturbance, roading and other disturbances such as this line and associated activities will cause. This will lead to further altered wildfire cycles (Whisenant 1991, Billings 1994). See Pellant 2007 USDI BLM Congressional Testimony, See Wyoming Basin Ecoregional Assessment, see Nevada Ecoregional Assessment, Knick and Connelly (2009/2011), Comer et al. 2012 Great Basin Rapid Ecological Assessment.	See the responses to your similar comments above.
101611	(clxxxvi)	KATIE FITE, WILDLANDS DEFENSE	How much will the risk of wild land fires (and thus significant losses of habitat) increase with Gateway, B2H or other development including foreseeable lines spawned? Wildfires that start due to construction and operation accidents or other factors (raptor collisions with lines, downed lines, explosions, maintenance or operation of vehicles, transformers, etc.) may affect a vast area of important and critical habitats for imperiled and sensitive species like sage grouse and pygmy rabbit. There is not even a baseline map provided of fire history, treatments and seeding history and “success”, or presence and abundance of cheatgrass, medusahead or other weedy exotic species in the project area and surrounding landscape. In Idaho and Oregon, cheatgrass sites are now being invaded by medusahead and/or rush skeletonweed, etc. in grazed disturbed landscapes. Detailed mapping down to small patches of vegetation must be provided along each route alternative. Agencies were able to effectively do this in the Jarbidge even at the time of Murphy Fire.	See the responses to your similar comments above.
101611	(clxxxvii)	KATIE FITE, WILDLANDS DEFENSE	Fences have serious adverse effects on mule deer, bighorn sheep, antelope, sage grouse, and many migratory bird species (Connelly et al. 2004), Knick and Connelly (2009/2011), Manier et la. 2013 Baseline Ecological Report. What is the current Footprint of fencing and other livestock infrastructure in the affected landscape, and how could this line alter it? How do fences impact wildlife and recreational uses? Do they block or impede big game use and movement – including during periods of snow accumulation when any supposed “wildlife friendly” spacing will not be “friendly”, movement to seasonal ranges, etc? Here, fences collect tumbleweeds, and may be significant impediment to antelope and some other wildlife. Where are all critical or seasonal ranges located in the landscape impacted? Fences provide even more elevated perches for brown-headed cowbird nest parasites on species like sage sparrow, Brewer’s sparrow, sage thrasher, loggerhead shrike, etc., or perches for egg predators like ravens, or predators on nesting birds. Livestock trailing along fences promotes weed corridors and fence disturbance areas like roads provide travel paths for predators. Tumbleweeds in arid degraded and disturbed habitats lodge in fences, blocking antelope and other passage – please see the Jarbdige BLM AMS for the RMP. The cumulative impacts of fencing and other developments on wildlife habitats and connectivity needs to be assessed.	As part of the HEA process, known fence locations were mapped. In addition, fences were assumed to be located along the boundaries of fields, along roads and highways, and on other logical boundaries, such as grazing areas. Their effects on sage-grouse were included in the HEA. The BLM is working with the USFWS to develop additional mitigation sage-grouse.

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101611	(clxxxviii)	KATIE FITE, WILDLANDS DEFENSE	Locating high tension lines in or near wildlife habitats, rare plant populations, WMAs, or other habitats essential for species survival or habitat connectivity, or migratory bird flyways, may have serious adverse impacts. They may cause mortality and population losses. Where are all known migration corridors or movement pathways? Please conduct necessary baseline studies to determine migratory bird routes, especially in areas where such routes may be less known. What percentage of the population of each species may use each route? How might this corridor and also the development that may be spawned such as industrial wind farms on remote ranges affect population viability?	See the responses to your similar comments above.
101611	(clxxxix)	KATIE FITE, WILDLANDS DEFENSE	What is the relative density of all transmission lines? It is unacceptable for BLM to consider alternatives that sprawl lines outward into areas currently distant from transmission lines when there are already so many lines and other development across the Snake River Plain.	Transmission lines that are 138-kV or higher are shown on the Appendix A maps. Also see Figure E.24-1 which shows existing and proposed transmission lines. Figure E.24-2 shows existing and proposed power generation facilities. Chapter 4 discusses cumulative effects.
101611	(cxc)	KATIE FITE, WILDLANDS DEFENSE	All of this must be determined now. Land Use Plans have been amended for sage-grouse. This did not strip all the other protections. They still contain specific protections for big game and all other sensitive species, as well as some wildlife species “forage” allocations, and other habitat protections. They may contain population goals, and prohibitions against causing adverse impacts to sensitive species and other important values of the public lands. BLM in the Bruneau, for example, is to give Priority to sensitive species. The consequences of any Gateway and/or B2H Amendment cannot be understood unless current and comprehensive wildlife information is provided, and all other parts of the Land Use Plans are examined for compliance. Especially in the case of old land use plans, there have been many more miles of fences, livestock water developments, sagebrush loss, expanded roading, housing sprawl, energy projects or other adverse impacts than the plans ever examined at the time of their development. All of the adverse developments in excess of what the plan provided must be examined before any harmful new Idaho Power project amendment can occur.	The Project would have to be consistent with BLM land management plans, as amended, in order to be approved.
101611	(cxci)	KATIE FITE, WILDLANDS DEFENSE	Please provide a full and detailed analysis of how any rehab of disturbed areas would occur, including how any rehabbed areas would be protected from grazing. Entire pastures must be closed. Otherwise more fencing would need to be built. Will native species only be used in any site rehab? How will global warming impede rehab of disturbance zones? Only local native ecotypes should be used in rehab efforts. A minimum of10 years rest, and specific recover criteria including recovery of microbiotic crusts and the native shrub component must be required.	See the discussion of restoration in Appendix K. Restrictions on grazing following restoration would follow land management plan requirements. The SRBOP RMP has the following Standard: "Areas treated for restoration or rehabilitation purposes will be rested from livestock grazing for whatever time is necessary for adequate recovery and/or seedling establishment, up to ten (10) years."

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101611	(cxcii)	KATIE FITE, WILDLANDS DEFENSE	Invasive species like cheatgrass (promotes wildfires, see Billings 1994) and tumbleweeds thrive in disturbed areas. Windblown tumbleweeds and tumblemustards endanger motorists on roads, clog fences, heighten fire danger, etc. in the path of Gateway and portions of B2H. Agencies already conduct fenceline tumbleweed burns, and have started escaped fires as a result. There is no detailed analysis of the adverse effects on health and safety of motorists on federal, state, and local highways in the project potential route Footprints. What dangers does the infrastructure and foreseeable effects here pose? Besides windblown weeds - what effects might any additional facilities have in concentrating livestock or big game use on roadways? Will there be fencing to temporarily "rest" rehab before full-bore grazing resumes? What impacts will that have? What exposure will passing motorists have to herbicides used to control weeds thriving in corridor disturbance zones? Please note that the old 2007 BLM Weed EIS (Vegetation Treatment EIS) is now greatly outdated and inadequate in addressing ecological and human and wildlife health concerns related to the use of an ever-growing number of herbicides across public lands. Its risk assessments are long outdated, yet BLM continues to rely on them, including in all the new "treatment" EAs and chemical EAs the agency is churning out. These include the Boise District Weed EA. http://www.blm.gov/id/st/en/newsroom/2016/march0/blm_seeks_public_comment.html, Vale Weed http://www.blm.gov/or/districts/vale/newsroom/files/OR-030-11-018Herbicides_Final.pdf the highly controversial and minimal Soda Fire Rehab DNA http://www.blm.gov/id/st/en/Districts-Idaho/BDO/soda_fire_emergency.html , an Appealed "targeted grazing" emergency DR http://www.blm.gov/id/st/en/newsroom/2016/may/blm_to_build_fuel.html , WLD Appeal of Owyhee "Emergency" Fuelbreaks DR, etc. See also numerous WLD submissions discussing BLM's ramping up toxic herbicide use on degraded lands while failing to control livestock as a cause of weeds. This emphasis on herbicide use is all being done without BLM ever showing that its herbicide arsenal is actually effective in any way in addressing invasive flammable grasses and noxious weeds in grazed landscapes. See WLD Attachments. BLM documents typically contain only old, outdated, or minimal to non-existent analysis of herbicides currently in use and their adverse effects to native vegetation, rare plants, sensitive species, water quality, recreational users of pubic lands, and neighboring landowners. "Integrated" weed management simply is not being used on public lands. Livestock are herded right through known weed infestations and turned out into still uninfested areas. Trampling, which greatly impacts soil crusts (crusts are a frontline defense against weeds) is unregulated and unmonitored. Herbicide use is futile given these circumstances.	See the responses to your similar comments above.
101611	(cxciii)	KATIE FITE, WILDLANDS DEFENSE	In fact, there appears to be a growing recognition that herbicide use is futile and the chemicals are harmful – see Malheur Argus Observer article recommending mowing rather than spraying white top, for example. http://www.argusobserver.com/news/invasive-white-top-spreads-to-rangeland/article_c08a6b5a-1fe7-11e6-89f5-1fa1c434a741.html The disturbance paths of both Gateway and B2H are highly likely to expand white top infestation, and this will take place over the life of the line as vehicles drive through patches enroute to sites. Every year white top is spreading more and more, and if it gets into crop land there is a limited opportunity to control it, he said, because of the amount of herbicide required to kill the noxious weed. Those amounts can not be used safely on crops, and the pesticides which are strong enough to control white top are not labeled for use around crops, Page said. "Another thing people can do to help is to mow white top early, before the plants flower and set seed, Buhrig said".	Comment noted. Herbicide use would have to meet all state and federal requirements or it would not be permitted. See the environmental protection measures in Section 3.8.
101611	(cxciv)	KATIE FITE, WILDLANDS DEFENSE	How will this affect the safety of small plane operation in all areas, including landing at smaller airstrips across this vast area in the Footprint of all potential routes? This can have ramifications for emergency medical services, state or federal agency monitoring of land conditions or wildlife populations, wild land fire fighting, and other increasing uses of aircraft.	Please see the discussion in Section 3.19 for a discussion of landing strips and airports in and near the analysis area.

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101611	(cxcv)	KATIE FITE, WILDLANDS DEFENSE	There is no adequate discussion or analysis of the current ecological health or importance of all the lands (BLM, state, private, military at OTA and Saylor Creek) that will be affected. This is important to understand the difficulty of any rehab and the likelihood of invasive species dominance, and altered fire cycles caused by Gateway and B2H development. Current FRH analysis is essential in order to understand baseline conditions and the severity of current livestock effects. It is necessary to understand the relative scarcity/tremendous ecological importance of remnant better condition lands that will be impaired as the project tears apart the remaining habitat areas in shrubsteppe, salt desert shrub and other arid habitats. It is also necessary to identify sites where mitigation such as livestock removal could protect remaining habitats, or allow effective recovery and actual native restoration actions to take place. What do exclosure comparisons in the SRBOP and elsewhere show about the effects of grazing? Landscapes will be further fragmented and torn apart once the infrastructure is in place as new development is facilitated by the line. This will compound the adverse effects of chronic grazing disturbance across the landscape.	See the responses to your similar comments above.
101611	(cxcvi)	KATIE FITE, WILDLANDS DEFENSE	BLM must conduct a full-scale analysis of the effects of this development on short term, mid term, and long-term viability of all sensitive species populations and all imperiled species, and the significance of the habitat areas and populations to the species as a whole. See Wisdom et al. 2002, Connelly et al. 2004, Knick and Connelly 2010, Manier et al. 2013 as a starting point for this analysis http://pubs.usgs.gov/of/2013/1098/ .	See the responses to your similar comments above.
101611	(cxcvii)	KATIE FITE, WILDLANDS DEFENSE	Basic concerns in the context of the WWEC/DOE corridors are also relevant to Gateway in understanding the context of even more energy sprawl. The SEIS has not detailed and analyzed such concerns. Development of various alternative energy – including wind and/or geothermal energy facilitated by Gateway - would have a broad array of adverse effects to wildlife, recreational uses of public lands, and potentially even agriculture. Tapping into or altering geothermal waters would accelerate aquifer depletion. Geothermal development would also deplete, alter and potentially destroy important recreational hot springs, or areas with important cultural importance.	See the responses to your similar comments above.
101611	(cxcviii)	KATIE FITE, WILDLANDS DEFENSE	Large wind, solar or geothermal facilities themselves have a significant Footprint on the environment, and lead to further habitat loss, alterations and fragmentation. The Footprint includes new and/or expanded road networks. All the adverse effects associated with these - from elevated perches for sage grouse nest predators or pygmy rabbit predators in livestock-degraded landscapes that have suffered extensive alteration of shrub structure and denser sagebrush - to weed invasions from project-disturbed areas choking pygmy rabbit habitats - must be considered. There is also greatly increased human activity (including during sensitive wildlife wintering, birthing or nesting periods) associated with siting energy facilities in remote areas, as well as increased wildlife mortality on roads, or from collisions with infrastructure.	See the responses to your similar comments above.
101611	(cxcix)	KATIE FITE, WILDLANDS DEFENSE	New roading, new development, transport or use of hazardous substances and use of many kinds of environmental pollutants/contaminants including toxic herbicide use and drift will take place. There are a many effects on drainage networks and ground and surface waters. These effects range from increased sedimentation (caused by new or expand road networks) that pollute and clog endangered or sensitive aquatic biota or other habitats, to pollution/contamination from PCBs/other harmful utility industry chemicals, petroleum products, herbicides, etc. contaminating ground and surface waters. There are many foreseeable ways in which the Clean Water Act will be violated. There is no adequate assessment, mitigation and monitoring to establish and baseline and minimize harm during construction and over the life of the line, roading, or facilities.	Soil erosion and hazardous material spills are discussed in Section 3.15, preventing contamination of water sources is discussed in Section 3.16. Also see the EPMs in Appendix M of the FSEIS.

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101611	(cc)	KATIE FITE, WILDLANDS DEFENSE	Construction of expanded roads or facilities will alter hydrological processes. It may affect both ground and surface waters – and a broad range of native wildlife species, and human uses and enjoyment of wild lands and any surface waters including small playas. BLM use standards are typically far too lenient to protect what remains from grazing and especially trampling impacts. Roading that alters hydrological flows, or energy development linked to this EIS that depletes ground or surface waters, may have significant adverse impacts. Further alteration of hydrological processes or depletion of exceedingly scarce water sources in high desert regions is also possible, including unanticipated effects from blasting. These areas are critical to a broad array of wildlife. many have already suffered large-scale degradation, depletion and in some cases been killed entirely by the effects of livestock grazing and BLM and forest service "development" for livestock. See Sada et al. 2001, BLM Technical Bulletin, describing the sad and sorry state of many of the region's springs and waters. A Supplemental EIS must fully examine the current condition (including both water quantity and quality and any documented changes over time up to this point) of springs, seeps and riparian areas across the affected landscape. It must then determine the effects of Gateway (and in Oregon B2H) alternatives/segments and associated, linked or foreseeable development on these critical riparian/watershed areas. This is especially a concern in B2H routes.	Your comment that BLM standards for are too lenient to protect areas from grazing are noted, as are your many comments that grazing is harmful. The EIS recognizes that over-grazing can have a negative effect on habitat. The cumulative impacts from this and other foreseeable projects is discussed in Chapter 4. Springs and seeps are discussed in Section 3.16. The number of streams, including ephemeral streams, crossed by each route is identified. Additional springs and seeps may be located during surveys if a route is approved, these would be protected to the extent practical during design.
101611	(cci)	KATIE FITE, WILDLANDS DEFENSE	Ecosystems across the arid West will be under even greater stress with climate change, and facing further flow reductions due to diminished snow pack, increased temperatures, more extreme weather events, and other factors linked to global warming/climate change. How will any potential route with this project and the linked and foreseeable development amplify global warming effects and disruptions/losses?	Greenhouse gas emissions per alternative are discussed in Section 3.20.
101611	(ccii)	KATIE FITE, WILDLANDS DEFENSE	Alternatives must be developed to focus on conservation and responsible transmission siting that includes using existing corridors and disturbed areas wherever possible. There has been no systematic and fact-based examination of any "need" for the particular swaths. Promoting and relying on huge energy projects sucks funding, interest and incentives (both federal and private) from efforts to develop local conservation, and home-produced energy such as solar or wind-powered houses with power generated where it is used.	We believe that the extensive analysis and the many alternatives considered over the last several years demonstrate the BLM's commitment to conservation and responsible transmission siting that includes using existing corridors and disturbed areas wherever possible.
101611	(cciii)	KATIE FITE, WILDLANDS DEFENSE	The SEIS provides some species lists, and minimal mapping of biological information. No adequate current, site-specific surveys for rare or imperiled species over the footprint of all potential segments of all routes is presented. Rare plants are likely to be greatly affected by invasive species promoted by disturbance from construction, operation, and linked developments. There are nationally significant biological resources and rare species that are affected and will be further imperiled or extirpated under the profligate development of public wild lands that this EIS promotes with many of the alternative routes. Powerlines provide ample sage grouse avian predator and egg-predator perches – where ravens can scan for nests. Powerlines are always accompanied by new roading. Grazing livestock in land areas increases raven presence and predation risk (Coates et al. 2016). Additional roading and other disturbance also increases avian nest predator impacts.	See the response to your similar comment above.
101611	(cciv)	KATIE FITE, WILDLANDS DEFENSE	It is alarming to us that "mitigation" for many mega powerlines and energy corridors is minimal and consists largely of "research" dollars, or conservation easements that typically allow abusive grazing, predator killing, and other harms to the ecosystem to continue, or funds to Game Departments or BLM to once again prove that already known to be highly predictable wildlife declines and species loss will occur post-development. The other standard "mitigation" is killing trees and shrubs – which often has significant adverse impacts and is not really "mitigation" but often is more aimed at appeasing livestock or trophy hunting interests. Damaging powerlines, carved into important habitats for sensitive species, are virtually always given the greenlight – despite the long-lasting tremendous impact these developments have on wildlife, watersheds, native plant communities and much-increased risk of weed development, cultural sites, wild land recreational uses, etc. BLM must clearly state if impacts cannot be mitigated in any segments of potential routes for the line. Mitigation by avoidance and re-routing must be applied.	See the response to your similar comment above. Extensive compensatory mitigation would be required for impacts that cannot be avoided or minimized if the project is approved. See Appendix K for a discussion.

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101611	(ccv)	KATIE FITE, WILDLANDS DEFENSE	Claimed BMPs, Standard Operating Procedures and other supposed protections all may be waived or altered as the project is being built and operated. Plus it is unclear if these can be dropped any time the proponent wants on private land, or if they are even being applied there. This may represent a serious unassessed impact. The EIS leaves the door wide open for the energy developer to pressure BLM to issue waivers. BLM does this all the time in Wyoming for Oil and Gas, or with pipeline projects, and has been issuing waivers for wind energy. This took place with Nevada's Spring Valley Wind project. In fact, the so-called "mitigation measures"/avoidance periods/environmental protections have often been routinely waived for industry. Environmental protections are a fleeting mirage on paper in the EIS, and absent on the ground. So the EIS's that promised mitigation/avoidance really weren't worth the paper they were written on. This is precisely what is taking place here. The DEIS stated "a list of all state and federal restrictions can be found in Appendix 1; the Project would be required to comply with all agency timing restrictions unless an exception is granted by Agencies". This may be continued in the SEIS. This leaves the door wide open for Idaho Power to exert political pressures through backroom methods and get mitigation and protections promised to the public cast aside as the project is built and operated. Time after time in project after project, many of the agency boilerplate mitigations have proven completely inadequate to protect species like sage-grouse and many other rare animals and rare plants from the consequences of the new project. Much more certain/binding, conservative and protective measures must be put in place. All high quality habitats for species must be avoided to the maximum extent possible. WHERE are these habitats – for all species of concern? A reader of the EIS cannot tell.	Comment noted. The EIS includes a process for requesting a waiver based on conditions at the time of construction. The BLM would weigh each request on the merits.
101611	(ccvi)	KATIE FITE, WILDLANDS DEFENSE	It is impossible to believe that Idaho Power is not aware of potential additional projects that may be developed once these new behemoth lines gets green-lighted. This EIS must fully examine the large-scale deleterious effects of foreseeable development and other corridors/projects, as well as other foreseeable linked powerlines, and provide some sizable mitigation funding and significant mitigation actions – not just giving agencies some funds to study species decline or kill some junipers, and fragment more habitats. BLM must use the methodology and science in the Sage Grouse Conservation Assessment (Connelly et al. 2004), Knick and Connelly (2009) Studies in Avian Biology to conduct a science based analysis of the direct, indirect and cumulative effects of the project and linked development, and use this as the basis for developing alternatives. Relying on flawed models, and flawed mitigation of the HEA and other "models is greatly inadequate, as the sage-grouse population and other wildlife populations continue to decline. See also Crist et al. 2015, expressing concern about the ever-shrinking habitats for concern for sage-grouse, and PEW's Garton et al. analysis of declining populations http://www.pewtrusts.org/en/about/news-room/press-releases/2015/04/24/pew-sage-grouse-report-points-to-need-for-balanced-land-management , http://www.pewtrusts.org/~/media/assets/2015/04/garton-et-al-2015-greater-sagegrouse-population-dynamics-and-persistence-31815.pdf?la=en	Foreseeable projects are addressed in Chapter 4. Please note that Idaho Power is not the author, or even a cooperator, for of this EIS, The BLM is preparing the analysis with the help of a third-party contractor. In response to the comment on sage-grouse, please see the responses to your similar comments above.
101611	(ccvii)	KATIE FITE, WILDLANDS DEFENSE	Please conduct current and updated habitat impact and fragmentation analyses for all impacted sage grouse populations as described in the Connelly et al. 2004 Assessment, Knick and Connelly (2009), PEW Garton et al. 2015 analyses. There has also been tremendous wildfire habitat loss of critical lek complexes and other habitats. In all of these efforts – the broader populations and the smaller populations. The population on the Oregon-Idaho border region impacted by B2H, for example, was already seriously declining prior to the Soda Fire. Livestock degradation had resulted in considerable spread of cheat and increasingly medushead as cattle and sheep were trailed through known infestations and turned out on uninfested areas, grazing is poorly controlled, grazing is allowed during spring or other periods of excessive soil moisture when unregulated trampling impacts are maximized, etc. Fires prior to Soda received minimal rest and even more seeding of deleterious crested wheatgrass. Please examine the current effects of fragmentation and loss of habitats and the plight of all sensitive species populations in the region --- effects of fire, livestock fences and other infrastructure, weed infestations and vulnerability to infestations with continued grazing disturbance, roads, existing and foreseeable energy development, powerlines, etc. Please project effects to populations over time with and without development of this mega utility corridor in the area.	Please see the response to your similar comments above.
101611	(ccviii)	KATIE FITE, WILDLANDS DEFENSE	As mitigation, Idaho Power should set up a substantial fund to purchase and retire public lands grazing permits. This EIS should work with BLM in tailoring language that amends Land Use Plans and allows for permanent retirement of grazing permits so purchased.	Comment noted. Revising management plan to eliminate grazing is beyond the scope of this project-level analysis.

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101611	(ccix)	KATIE FITE, WILDLANDS DEFENSE	The Gateway project has long claimed to be decreasing "congestion" and enhancing capability of the grid, but the EIS does not provide necessary analysis to allow understanding of why only the Proposed Action or routes in that and only that location, would magically achieve this compared to a broad range of other alternative disturbed locations, conservation actions, and more localized energy development.	Comment noted .Please see the response to your similar comments above.
101611	(ccx)	KATIE FITE, WILDLANDS DEFENSE	Will this facilitate remote siting of nuclear plants? One had been proposed in Elmore County, likely a scam but potential Nuke plant proposals remain a possibility. It has been rumored that the northern split line in Idaho was in part based on the highly controversial mini-nuke proposal being hatched at INL. If so, this is a major human health issue that needs to be thoroughly examined. This would also generate hazardous waste that somehow must be dealt with. Plus, nuclear energy requires a large volume of water for cooling, and any nuclear development in the water-scarce West may strain and deplete waters. There is a potential for contamination and pollution. Or is the Gateway Project potentially or foreseeably to be linked to military uses, for example in the OTA, or Saylor Creek or elsewhere? Will this (or B2H) facilitate additional phosphate mining, cyanide heap leach gold or other hard rock mineral mining, and linked mercury poisoning of regional airsheds and waters?	We are not aware of any foreseeable nuclear power plants in Elmore County. We have no information to indicate that the transmission line would affect the development of such facilities one way or the other.
101611	(ccxi)	KATIE FITE, WILDLANDS DEFENSE	BLM must also assess the deleterious cumulative impacts of military activity (training/bombing areas, noise, traffic, fire risk, etc.) on values threatened by Gateway.	The military training area existed prior to the establishment of the SRBOP. The enabling legislation specifically permits this use to continue. The military's management of the training area has been quite successful. The OCTC contains the majority of the high-quality habitat in the NCA.
101611	(ccxii)	KATIE FITE, WILDLANDS DEFENSE	The project routes will greatly blight and mar scenic viewsheds, wild natural settings, historical trails, etc. The EIS must fully examine the adverse effects to public enjoyment of cultural and historic sites, and potential adverse effects.	Scenery is addressed in Section 3.2 and Appendix G. Also see the photo simulations in Appendix E. Additional KOPs and simulations have been prepared for the Hagerman area at the request of the NPS.
101611	(ccxiii)	KATIE FITE, WILDLANDS DEFENSE	Please provide mapping and analysis that overlays Dark Night Sky areas with the path. How will this project adversely impact the Darkness of Night Skies? Placing a line that may be linked to sprawl of industrial wind or other energy or military facilities in the northern Jarbidge or elsewhere will result in light pollution expanding. This has not been addressed. The EIS has not addressed the likely amount of intrusive lighting that would be associated with various facilities, or with the developments that would be spawned. The BLM has not developed efforts to avoid or mitigate this.	See the responses to your similar comments above.
101611	(ccxiv)	KATIE FITE, WILDLANDS DEFENSE	Here are photos of the large-scale disturbance associated with the SWIP powerline that was built in Nevada to illustrate concerns about construction disturbance. Large areas of access roading are bladed, areas of tower assembly are mowed, bladed or reduced to bare dirt. Dust clouds boil out from the disturbed areas. Then – large herds of livestock are herded and or grazed for months at a time right on top of disturbed lands. The end result? Swaths of Project-caused weeds soon spread crosscountry in the wake of livestock disturbance to microbiotic crusts, soils, and plant communities. Photos Fite August 2011 White River Valley near Grant Range. View of one portion of upper crossarm assembly site. Roading was churned to powdery dust, and access road appeared to be new or freshly bladed to a much greater width. SWIP was an Idaho Power right of way sold to another party. [4 photos] The SEIS fails to provide information necessary to understand and visualize the degree and severity of impacts of project construction, linked development and infrastructure sprawl, rehab and mitigation actions. If Gateway Carves A New Corridor – Other Lines Will Follow Adverse impacts of Gateway's loose and uncertain analysis, environmental controls and mitigation may also set a precedent for new harmful routes to be followed by other transmission or oil and gas or even water export lines. Location of All BLM or other Energy Leases, Gas Wells, Mine Claims, Etc, Must be Overlaid Vast areas of the public lands have been leased, or rights of way granted, by BLM (and some by the Forest) for oil, gas, geothermal energy, wind MET towers or sites, communication towers, etc. Where are all leases located along the Footprint of Gateway or any Alternatives? And what foreseeable development might be spawned by Gateway?	These photos or similar ones were submitted in past comment by the WWP. They were considered in the analysis. Building a transmission inevitability results in soil disturbance. The EIS discloses that there would be soil disturbance if the project is approved. The amount of soil disturbance is estimated for each route in Section 3.15. Restoration and mitigation for impacts are addressed in the FSEIS.

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101611	(ccxv)	KATIE FITE, WILDLANDS DEFENSE	All of the electrical energy and similar issues raised are of significant concern to the public. This includes voltage build-ups, EMF health effects, low frequency electric and magnetic fields, audible noise, stray voltage, interference with electronic equipment, interference with wild and domestic animals behavior and health. High voltage lines produce a very audible crackling noise, which at times is quite loud. How do different weather conditions, voltage loads, etc. affect this as well as EMF and other hazards? The DEIS downplayed this by saying "the air breakdown, or small spark caused by corona to the surface of a transmission line conductor, is accompanied by a snapping sound. If there is sufficient corona activity on a high voltage line … may be sufficient … to produce discernible noise". The use of the word may is not accurate. These lines are always audible and producing noise. This may interfere with animal communication and behavior in various ways, and is annoying to people. What species given their known hearing and communication systems, may be particularly vulnerable? The DEIS 3.21-11 described electric fields associated with lines inducing small electric currents in metallic objects, and possible nuisance shocks –which can occur to electric fences, vehicles, irrigation systems. "Stray voltage" refers to a phenomenon in wet environments. Animals, recreationists, scientists or others may be near the line under such conditions, in vehicles or hiking on foot. What hazards does this pose – as hikers can't be grounded – and cars can't either. It is difficult to understand what the effects would be from the material in the DEIS and now SEIS. Both the human health and the animal adverse impacts have not been analyzed. For example, what species have low frequency communication –and how could the lines impact this? While these various effects of concern are described, the EIS is not adequate to determine impacts. The line is likely to lead to wind energy and other sprawl, and the adverse impacts of wind farm noise, flicker effects and other concerns that may affect human health as well as wildlife – so what will the cumulative impacts of this all be? Please also review the information on infrared energy we have discussed elsewhere, and how many animals may see flashes from the line.	The BLM recognizes that these factors are a concern, they are addressed in the SEIS. EMF health effects, low frequency electric and magnetic fields, audible noise, stray voltage, interference with electronic equipment, interference with wild and domestic animals behavior and health are addressed in Section 3.21. Noise is addressed in Sections 3.21 and 3.23, public safety in Section 3.22.
101611	(ccxvi)	KATIE FITE, WILDLANDS DEFENSE	The fire prevention measures are inadequate. No construction activities (blasting, motorized equipment use) should be allowed during periods of "High" fire danger on public lands. Idaho Power must be responsible for paying for the full costs of any fires linked in any way to this line over its entire period of construction and operation. Lands must be rehabbed with local native ecotypes, and grazing removed until recovery of all components occurs.	Please see the environmental protection measures for blasting and fire safety in Appendix M.
101611	(ccxvii)	KATIE FITE, WILDLANDS DEFENSE	Blasting is mentioned here. How much blasting is proposed, and where – for all segments of the line and access roads? Until full and detailed surveys in the noise Footprint of the line are conducted and detailed plans for this line produced, it will be impossible to understand impacts.	The comment is correct, the full effects cannot be known until an alternative is approved (if one is) and final design is completed. The EIS provides an estimate of the effects based on indicative engineering (see the explanation in Chapter 2).
101611	(ccxviii)	KATIE FITE, WILDLANDS DEFENSE	No guy wires should be allowed. What designs are possible? They pose a collision risk for bats and avian species, as well as public safety concerns. The DEIS described 4 guy wires each 140 feet long spaced in a square around each tower. 3.22-13. This again highlights the need for detailed study of migratory bird use and movement patterns including migration routes across the footprint of the line. All guy wires and all transmission wire lines must be marked.	Comment noted. See the measures being implemented to protect birds in Section 3.10.2.5.

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101611	(ccxix)	KATIE FITE, WILDLANDS DEFENSE	We have discussed our concerns about unassessed cumulative effects throughout these comments. It comes as no surprise that the Gateway cumulative effects analysis is greatly flawed. The EIS attempts to use a Table with a list of some projects listed to avoid full and detailed cumulative impacts analysis. It is impossible cumulative effects as there has been no adequate baseline. Now this simplistic approach how SEVERE the effects of the other projects will be, and the full array of threats and vulnerability of the habitats and populations impacted. The Table also omits many harmful activities occurring chronically in the Footprint of the line – like chronic livestock grazing disturbance. For example, the section on migratory birds and raptors (Section 4.4.11.3) claims that "effects of Gateway could occur primarily during construction". Yes, the construction impacts may be severe – but the effects of the line - combined with chronic grazing disturbance, energy disturbances, roading, etc. will play out over the life of the line. The line will be a long-term lethal collision hazard causing death of migratory birds. The EIS concludes, with no basis that "the Gateway Project would not have a measurable adverse effect on migratory bird populations, habitats ecological conditions and/or significant bird conservation sites". Of course, this conclusion is based on the "Don't Look, Don't Find" baseline that BLM has somehow allowed Idaho Power to get away with. There is no way any valid conclusion can be drawn until in-depth site-specific surveys for migratory birds, including imperiled species like the loggerhead shrike, and all of their nesting, migration, and less fragmented habitats are examined across the footprint of all potential routes.	See the response to your similar comment above.
101611	(ccxx)	KATIE FITE, WILDLANDS DEFENSE	Please recall the disastrous impacts to anadromous fish in Idaho of Idaho Power constructing the Hells Canyon dams without proper care for fish passage. Salmon were wiped in the Weiser River and other tributaries. Now in 2016, wildlife and remaining open space in the areas of the line are currently under siege. Solid baseline information must be acquired, best available science applied, and route segments with significant conflicts abandoned. Otherwise, Idaho Power's Gateway Project may be a very significant factor in extirpation of populations.	The Project does not include building dams. The analysis does not conclude that the transmission line project, including the proposed mitigation, would have population-level effects. The USFWS Biological Opinion does not conclude that the project would lead to the extirpation of any populations.
101611	(ccxxi)	KATIE FITE, WILDLANDS DEFENSE	It is impossible for a reader to understand alternatives and analyses, as generally only new information beyond what was disclosed in the FEIS is presented in each resource section. Routes are not re-analyzed. It is quite impossible for a reader to get the full picture of impacts that will result. It appears that the proponent wanted to pad each section of the EIS with lots of words, to create an illusion of detailed and sufficient analysis. Time after time, the EIS repeats many pages of its claimed litany of mitigation efforts. If that was cut out of each section, the significant lack of actual on the ground information and data would become starkly apparent.	Please see the response to your similar comment above.
101611	(ccxxii)	KATIE FITE, WILDLANDS DEFENSE	FEIS 3-1 states that NEPA requires an analysis of the effects of federal actions on all lands. Regrettably, for biological and many other resources, non-federal lands are treated as a black hole and data is lacking.	The EIS does consider the effects on all lands. This is evident in the text and the many tables that discuss effects on federal, state, and private lands separately.
101611	(ccxxiii)	KATIE FITE, WILDLANDS DEFENSE	3-3 states " a compensatory mitigation framework developed by BLM is included in the draft SEIS, a more detailed analysis of compensatory mitigation required for each resource will be presented in the FEIS". This makes it impossible for proper analysis to take place, and informed public comment. This is just like the B2H EIS, where time after time the so-called environmental analysis and discussion of mitigation refers one to an appendix, where information is still incomplete.	Please see Appendix K in this document for a discussion of mitigation.
101611	(ccxxiv)	KATIE FITE, WILDLANDS DEFENSE	3-4 refers to habitat restoration activities taking place in MA 1, an area "identified in the SRBOP RMP as the most resistant and resilient". There is no analysis of how these terms are defined, and their relevance to conservation of actual habitats and species in the real world. The MEP model is in Appendix K.	These areas were identified in the SRBOP RMP, which is referenced in the SEIS. The three MAs are mapped and described in Section 3.24.1 and Appendix K of this document. Please refer to the RMP for additional details.

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101611	(ccxxv)	KATIE FITE, WILDLANDS DEFENSE	Re: Trail actions. Why has no Trail Management Corridor been established in Idaho? Why is this not being undertaken as part of this process that has opened the door to a confusion of land use plan amendments – all aimed at stripping long term conservation regulation in this landscape? What is Table 3-1.1 actually showing? How can the NPS process for trails, begun in 2009, still not be completed? Concerns listed on 3.1-3 to 4 are not adequately assessed – including visual and recreational impacts. Setting is an important aspect of integrity of a property, "mitigation" may be impossible. There is limited discussion of impacts to Hagerman Fossil Beds, Three Island Crossing, King Hill to the NCA.	NHTs and the project effects on these trails are discussed in Section 3.1 and in Appendix J. Developing a Trail Management Corridor for the Oregon Trail is beyond the scope of this project-level analysis.
101611	(ccxxvi)	KATIE FITE, WILDLANDS DEFENSE	How have wind farms and expanded center pivots drastically altered views from so many portions of the Trail over the past decade? Where are there currently untrammeled vistas, and will Gateway impact such areas?	These factors are discussed in Sections 3.1, 3.2, and Appendix J.
101611	(ccxxvii)	KATIE FITE, WILDLANDS DEFENSE	We are concerned that the EIS does not conduct the full integrated and protective analysis required in 2016, for example in areas of the Bruneau MFP and others where the Land Use Plan is many decades old and many habitat losses have taken place the Plan was put in place.	Please see the response to your similar comment above.
101611	(ccxxviii)	KATIE FITE, WILDLANDS DEFENSE	Table 3.1.2 describes "the entirety of AU2 is rated as highly sensitive" The cultural modifications have already been very large in many areas.	Comment noted.
101611	(ccxxix)	KATIE FITE, WILDLANDS DEFENSE	We oppose reclassification of VRM II sites to VRM III. The SEIS previously recited a litany of existing intrusions into the viewsheds, and now Gateway proposes to strip protections for the sites it would impact. How much has the quality been degraded since protection was required under the Land Use Plan? This change runs counter to FLPMA. There is no indication that Idaho Power's transmission line is part of the combination of land uses that best meets the present and future needs of the American people, as described by FLPMA. The project is an outdated dinosaur --- unnecessary, extraordinarily expensive, and will impair and/or degrade some of the last bits of non-degraded area and remnant habitats in this landscape that the existing Land Use Plans promises the American people would be protected.	Comment noted.
101611	(ccxxx)	KATIE FITE, WILDLANDS DEFENSE	This project will diminish the NHRP integrity of resources, and their setting, feeling and associated qualities. It will impose long-term visual blight. It is impossible to understand the run on analysis without mapping accompanying it with the text. This, like all elements of the SEIS, appear to be designed to thwart real understanding of what will take place.	Please see the detailed text, photos and maps in Appendix J.
101611	(ccxxxi)	KATIE FITE, WILDLANDS DEFENSE	SEIS 3-2-76, and other discussions of MEP mitigation. Many of these claimed "mitigation" elements do not have much to do with Trails. There is maximum uncertainty, including over an Oversight Committee, "the current condition of acquired parcels can not be known", etc. MEP: "17 percent to mitigation", and the rest to enhancement. Funding of law enforcement, not really mitigation, would be transitory only for 10 years. Public service announcements are not mitigation – and would likely just hype Idaho Power and try to whitewash the impacts. Idaho Power's proposed MEP is utterly inadequate. It should be discarded, and Idaho Power told to start over the entire process – with new alternative routing north of I-84, and new mitigation. The MEP creates an illusion of mitigation and does not address irreparable and/or long-term new harms to less developed and/or impacted portions of the Oregon Trail. These same concerns apply to cultural resources. Site examination of only 12-17 percent of segments 8 and 9, and is inadequate. The whole area along all routes needs to be surveyed before any decisions is made. 3.3-4.	Please see Appendix K in this document for a discussion of mitigation for impacts to trails.

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101611	(ccxxxii)	KATIE FITE, WILDLANDS DEFENSE	3.3-40. Why aren't many sites evaluated (17 properties are "unevaluated")? Also, 3.341 describes revised route 9 being a "center of cultural interactions" so isn't its integrity critical? 3.3-41. "The data reveal that none of the action alternatives is clearly better at avoiding impacts to cultural resources than any other of the alternatives", and "When Quality and Quantity are taken into account, Alt. 4 would impact fewer "resources". Since the route path is not yet precisely known, full effects cannot be understood. Much of the mitigation and other information appears to be based on models. So critical measures to avoid, minimize or treat adverse impacts would not be sufficient. There is much uncertainty with the HPTP, and proper upfront avoidance is not being required.	As discussed in Section 3.3, the analysis is based on a literature review and a partial survey of a 500-foot-wide area along each route on federal lands. Generally, private landowners did not give approval for surveys on their land; therefore, surveys could not be completed on all portions of the routes and not all known sites could be evaluated. A full survey would be completed on the approved route (assuming the project is approved and ROW is granted). Avoidance measures would be implemented during the design phase of the project. The HPTP would be completed following final design to mitigate any impacts to historic properties that could not be avoided following design. Also see Appendix K for a discussion of mitigation for cultural resources not covered by the HPTP process.
101611	(ccxxxiii)	KATIE FITE, WILDLANDS DEFENSE	Page 3.3-46 contains gobbledy gook about the MEP and the baseline ecological condition not being known and some NRCS info being incomplete. As with the preceding section, there is no assurance that adequate analysis and mitigation will take place, or that impacts will be minimized.	Please see the response to your similar comment above.
101611	(ccxxxiv)	KATIE FITE, WILDLANDS DEFENSE	The Socioeconomics section fails to adequately assess the values harmed, and the impacts of the project. This includes to ratepayers across the region as Idaho Power increases rates to pay for this dinosaur of a project. Many of the impacts will be long-lasting and/or irreversible, such as new road gashes, destroyed but 'salvaged" cultural sites, and new flammable weed infestations. The EIS relies on 2009 scoping issues. This is a bygone era when it comes to rooftop solar and other alternatives not considered. It is impossible to assess the elements in 3-42.2, based on old info as well, such as effects on tourism and quality of life, condemnations, etc. This also does not take into account linked or foreseeable projects and developments. The population increase in the impact area is continuing, making untrammeled open space land and trail settings, wildlife viewing opportunities, etc. become more valuable by the minute. The tourism figures appear outdated. Idaho BLM's 2015 Fact Sheet shows recreation on BLM lands accounting for $358 million in economic output, greater than the value of extraordinarily subsidized and below market grazing on public lands, for example.	We do not agree that the Socioeconomics section is inadequate. Your comments on grazing and IP's rates are noted. The statement that the SEIS relies on the 2009 scoping process is not correct. A separate scoping process, including public scoping meetings, was completed for this SEIS in 2014; see Chapters 1 and 5 for details.
101612	(i)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	I am extremely frustrated that the BLM Washington, D.C. office chose to ignore the advice of its own local Resource Advisory Council (RAC), State agencies, local elected officials and stakeholders when it designated Alternatives 2 and 5 as co-preferred alternatives in the DSEIS. The rationale for selecting these preferred alternatives over RAC recommendations is not clearly stated in the DSEIS. The BLM's co-preferred alternatives are inconsistent with the directives of the November 2013 Record of Decision (ROD) and are routes that the RAC analysis found to have unacceptable adverse impacts on resources and communities in Owyhee County. Alternatives 2 and 5 run through extensive private land holdings and/or disrupt Owyhee Front greenfield areas while possibly failing to meet the intended transmission reliability concerns of the proponent utilities.	The BLM chose the Revised Proposed alignment for Segment 8 as the Segment 8 alignment in DSEIS Alternatives 2 (a Co-Preferred Alternative) and 3. In addition, DSEIS segment 8H follows the Revised-Proposed alignment for segment 9 for two-thirds of its total length, especially in the Boise District portion (the RAC report's coverage area). So, in all, 5 of the 7 alternatives analyzed in detail in the Draft SEIS include at least one alignment recommended in the RAC route report.
101612	(ii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The final decision on Gateway West Segments 8 and 9 must reflect an Idaho consensus. Alternative 1- the RAC-recommended route and the proponents' revised proposed route- is the only acceptable alternative that avoids impacts to sage-grouse, is supported by the affected citizens, and is supported by Idaho's State and local elected officials.	Consensus was and remains a BLM goal for this project. However, the BLM must balance this desire with its obligations to all applicable laws and regulations, and land management policies at the National level. The BLM appreciates the State's perspective on the issues of sage-grouse impacts and perspectives of affected citizens, and shares the State's interest in considering these factors to reach a decision.
101612	(iii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL	The 2013 ROD directed the BLM to seek a consensus agreement with the Proponents and state and local authorizing entities for segments 8 and 9.[3] Alternative 1, the Proposed Route for Segments 8 and 9	As directed in the 2013 ROD, the BLM "pursue[d]" consensus on routing Segments 8 and 9 by

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		"BUTCH" OTTER,MATT WIGGS	in the SEIS, is the only alternative that meets these criteria. The BLM tasked its Boise District Resource Advisory Council (RAC) to lead the effort in finding a consensus alignment. After hundreds of hours spent examining route options, observing presentations, and studying the issues, the RAC identified the routes that the Proponents then incorporated as their proposed action alternative. This is the only alternative that meets the primary objective of the 2013 ROD deferral. Alternative 1 is Idaho's preferred route for several reasons. Not only will it result in the least amount of construction and operation disturbance, the Proposed Route will have the fewest impacts on sage-grouse, natural vegetation, waterbody crossings, prime farmland, and the fewest impacts on undisturbed land by falling within land already disturbed by existing infrastructure.[4] All of the action alternatives pass through the Snake River Birds of Prey (SRBOP) National Conservation Area (NCA) for some distance. Alternative 1 provides the greatest amount of mitigation and enhancement, which will improve the resiliency of the NCA by providing opportunities for increased vegetation improvement, law enforcement, and educational opportunities. Transmission lines also provide raptors opportunities to perch, prey, and roost.[5]	engaging the State and local community through the RAC and then through the multiple opportunities for involvement in the NEPA process, with the hope that this would lead to consensus. The BLM must balance the desire for consensus with its obligations under regulations and laws, including the statute that established the SRBOP. The original direction to the RAC was to "determine whether there is new information and/or modifications to the alternatives analyzed in the Final EIS … that the BLM should consider that could resolve … siting issues identified in the ROD," and during several subcommittee meetings, BLM-Idaho leadership and agency project managers specifically advised that any recommendations or rankings of route alignments by the subcommittee would not constitute NEPA analysis. The BLM chose the Revised-Proposed alignment for Segment 8 as the segment-8 alignment in DSEIS Alternatives 2 (a Co-Preferred Alternative) and 3. In addition, DSEIS segment 8H follows the Revised-Proposed alignment for segment 9 for two-thirds of its total length, especially in the Boise District portion (the RAC report's coverage area). So, in all, 5 of the 7 alternatives analyzed in detail in the DSEIS include at least one alignment recommended in the RAC route report.
101612	(iv)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Throughout this process, the BLM has adamantly opposed selecting the Proposed Alternative in order to avoiding siting the Project in the NCA as much as possible. This direction, brought on by the Washington D. C. Office, contradicts the purpose of initiating a supplemental EIS process for this Project. As our comments will outline, the BLM's predecisional process has directed the National Environmental Policy Act (NEPA) analysis towards an outcome that is not the best fit for wildlife, habitat, the NCA, affected counties, the State, or the Proponents, but only fits the desired political outcome of the Washington D.C. Office. The BLM must address and resolve the issues in these comments, and then provide stakeholders with the opportunity to review changes before the release of the Final Supplemental EIS. Any other approach will fail to adhere to the direction set forth in the 2013 ROD and will completely undermine the NEPA process.	A supplemental EIS addresses substantial new information relevant to a pending proposed land use after an initial EIS is finalized. In this case, substantial new information relevant to the ROW application for Segments 8 and 9 has become available since the 2013 Final EIS and ROD. Some of this new information is policy direction on management of NCAs in the BLM National Conservation Lands. Reaching a decision on the ROW application that is "the best fit" for affected resources and stakeholders is the BLM's goal and responsibility in the SEIS process.

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101612	(v)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	In the 2013 ROD, the BLM deferred its decision on Segments 8 and 9 "to allow additional time for federal, state and local permitting agencies to examine additional routing options," and "work with state and local government representatives to find a routing solution for Segments 8 and 9. Public land resources, local government land use plan objectives, and effects to local economies will be part of these siting discussions."[6] The BLM requested that the RAC consider these issues. The RAC formed the Gateway West Subcommittee (Subcommittee) to consider issues surrounding siting Segments 8 and 9 of the Project. The Subcommittee held eleven public meetings, one work session, and two field tours between December 2013 and May 2014.[7] In compliance with this mission, the Subcommittee recommended Alternative 1 in two detailed, scientifically-based reports which were adopted by the full RAC and submitted to BLM.[8]	The BLM sincerely appreciates the RAC's efforts to evaluate potential impacts from Segments 8 and 9 and consider the issues identified in the ROD, as well as the advice contained in the two RAC reports. The SEIS fully considers those reports along with the other input received during scoping for the SEIS. The RAC reports in and of themselves cannot be considered NEPA analysis, however detailed or scientifically-based they may be. In addition, the subcommittee limited its evaluations to the portions of the line in the Boise District and did not consider or comment on the portions of Segments 8 and 9 that would lie in the Twin Falls District. Moreover, during several subcommittee meetings, BLM-Idaho leadership and agency project managers specifically advised that any recommendations or rankings of route alignments by the subcommittee would not constitute NEPA analysis.
101612	(vi)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Unfortunately, the BLM ignored the advice of the RAC and designated Alternatives 2 and 5 as Co-Prefetred Alternatives in the Draft Supplemental Environmental Impact Statement (DSEIS).[9] The BLM not did include a clear rationale for selecting the Co-Preferred Alternatives over the RAC recommendations in the DSEIS. Rather, in a press release, the BLM stated that it selected the Co-Preferred Alternatives "after weighing the impacts of the revised proposal against ... mitigation considerations for the Morley Nelson Snake River Birds of Prey National Conservation Area ... and BLM policy guidance related to NCAs."[10] The press release revealed that the BLM had no intention of examining additional routing options upon deferring its decision on Segments 8 and 9. As such, the BLM wasted the Subcommittee members' time, utilized the RAC process in bad faith, and violated the RAC Charter. By failing to consider the findings of the Subcommittee's report, the BLM disregarded the many hours of voluntary service by the members of the Subcommittee and the public. Although the members of the Subcommittee knew the scope of their commitment when they were appointed, the number of hours volunteered was nothing short of extraordinary. In fact, the number of Subcommittee meetings over the span of seven months exceeded the number of annual meetings estimated for the entire RAC by 300-600%.[11] The BLM's intention to avoid the SRBOP NCA undermines the public-private partnership that is the RAC.	Information in the Draft SEIS (Sec. 2.3.4) and in the Notice of Availability provide the rationale for selecting the DEIS Co-Preferred alternatives. The RAC's recommended routes were not the consensus of the subcommittee, as is described in the route report. The original direction to the RAC was to "determine whether there is new information and/or modifications to the alternatives analyzed in the Final EIS … that the BLM should consider that could resolve … siting issues identified in the ROD," and during several subcommittee meetings, BLM-Idaho leadership and agency project managers specifically advised that any recommendations or rankings of route alignments by the subcommittee would not constitute NEPA analysis. The Revised-Proposed routes are the RAC-majority recommended routes and so are fully considered and analyzed in detail in the SEIS. Furthermore, CEQ regulations provide for the selection of co-preferred alternatives.
101612	(vii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Moreover, the BLM did not follow proper procedure in disseminating the Subcommittee's reports. The RAC and its members were appointed to provide advice to Secretary of the Department of Interior through the Boise District Manager.[12] According to the BLM's own narration of events, the Subcommittee's reports were never presented to Secretary Jewell. In fact, the BLM fails to discuss what it did with the Subcommittee's reports after they were forwarded to the BLM.[13] Unfortunately, this failure to follow protocol is only another example of the BLM undermining public efforts to participate in the NEPA process. In fact, the BLM couldn't even be bothered to include one of the RAC's reports in the DSEIS. Appendix H contains the RAC reports, but fails to supply the May 30, 2014 Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area report. Appendix H only provides the RAC Subcommittee's Report on Mitigation and Enhancement. BLM's failure to even supply the RAC report in the DSEIS illustrates BLM's pre-decisional approach to this project, and its failure to comply with NEPA.[14] The Department of Interior once praised BLM' s resource advisory councils as "critical to the BLM in carrying out its conservation vision ... for the [National Landscape Conservation System]."[15] The BLM must recognize that, in this case, the RAC is still critical to the BLM in carrying out its conservation vision for the SRBOP NCA. Accordingly, the BLM must give the Subcommittee's reports proper attention and consideration as well as forward the reports to Secretary Jewell.	Both RAC reports were made available on the BLM website immediately after they were transmitted by the RAC and have remained available online continuously since. As noted above, they became part of new information gathered during SEIS scoping and included in the SEIS scoping report. The routes evaluated in the first RAC report are included and discussed in Chapter 2, Section 2.5.2 of the SEIS, and both reports (the second evaluates the MEP) are included as Appendix H in this Final SEIS.

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101612	(viii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Alternative 1 is consistent with the Morley Nelson Snake River Birds of Prey National Conservation Area enabling legislation. The SRBOP NCA enabling legislation states that "the purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection, and enhancement of raptor populations and habitats."[16] Despite a thinly veiled attempt to distract from the real reason behind the SRBOP designation, Alternative 1 is consistent with the enabling legislation. In fact, the BLM' s own science demonstrates that 500- kV transmission lines within the NCA are compatible with raptors.[17]	The Draft SEIS discusses the issue of compatibility in the sections of Chapter 3, Affected Environment, that identify resources and values present in the SRBOP. The Final SEIS has added a separate section to Chapter 3 (Section 3.24) to discuss NCA Values. The relative benefits and negative impacts to raptor populations in the SRBOP are one factor analyzed in the SEIS but are not the only resource impact the BLM must consider. The full range of alternatives – including Alternative 1 and the No Action alternative analyzed in the 2013 Final EIS – are available to select in the ROD for Segments 8 and 9.
101612	(ix)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM-issued, peer-reviewed, scientific studies regarding the relationship of raptors with transmission lines report that 500-kV transmission lines enhance opportunities for raptors to perch, nest, and roost.[18] Raptors and ravens are attracted to 500-kV lines, and the productivity of hawks and eagles nesting on transmission towers is equal to, or better than, those nesting in the canyon.[19] Importantly, these reports were based on data that was collected in part at the SRBOP NCA. The BLM conveniently ignores this information, and in doing so, fails to comply with NEPA by not analyzing both the beneficial and detrimental effects of the project.[20] The BLM is not using high-quality scientific analyses to make the decision to avoid the SRBOP NCA, as required under NEPA and BLM policy, but a political agenda.[21] In fact, it is more likely that the infrastructure prohibition in BLM Manual 6100 is not consistent with the SRBOP NCA enabling legislation.[22] The enabling legislation dictates that the Secretary of the Department of Interior "shall review the plan at least once every 5 years and shall make such revisions as may be necessary or appropriate."[23] This language implies that the SRBOP NCA is to be managed on an individual basis and that management decisions must be made on information specific the SRBOP NCA. The BLM and Secretary Jewell must make SRBOP NCA management decisions based on the enabling legislation, high-quality science, and NCA specific information.	The 2013 Final EIS and the SEIS considered research on the benefits to raptors along with other requirements for the SRBOP, for example, research on impacts to other resources at the landscape scale. As part of the BLM National Conservation Lands – which were Congressionally designated in the 2009 Omnibus Public Lands Management Act, the SRBOP is included under that system's management policies as reflected in BLM Manual 6100 et al. The SEIS does not assert that language in 6100 is a "prohibition" on infrastructure in NCAs.
101612	(x)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM's environmental justice and socioeconomic analyses are grossly inadequate and understates the potential adverse impacts of the Project in Owyhee County. A goal of NEPA is to ensure "all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings."[24] Theoretically, the environmental justice and socioeconomic analyses should provide the practical and conceptual specificity to carry out the aforementioned goal, and other goals, of NEPA.[25] At a minimum, the analyses should lead decision-makers to recognize and reject alternatives that will result in disproportionate adverse impacts in low-income and minority areas. Unfortunately the BLM's environmental justice and socioeconomic analyses in the DSEIS are too inadequate to result in the agency avoiding existing patterns of inequality or leading decision-makers to reject alternatives that result in adverse impacts on populations of a cetiain race or income level. Rather, the BLM capitalizes on NEPA's inherent substantive limitations and treats these analyses as a procedural, "check-the-box," exercise. In its environmental justice analysis, the BLM fails to comply with CEQ or EPA environmental justice guidance, dismisses public participation, and does not support its conclusion that the "Project is not expected to have high and adverse ... effects on nearby communities,"[26] and the BLM's socioeconomic analysis specifically excludes the tasks outlined in the 2013 ROD to consider the effects on local economies. The BLM indicates that it followed EPA and CEQ guidance in composing its environmental justice analysis.[27] However, the EPA guidance, which requires a more detailed analysis than the CEQ guidance, is not reflected in the DSEIS. The EPA Guidance identifies "three vantage points" from which a federal agency is to approach an environmental justice analysis: "1) whether there exists a potential for disproportionate risk; 2) whether communities have been sufficiently involved in the decision-making process; and 3) whether communities currently suffer, or have historically suffered, from environmental or health risk hazards."[28] Although the BLM does use U.S. Census Bureau data to identify minority and low-income communities that could be affected by the routes and alternatives for Segments 8 and 9, it looks no further than that data in determining whether there exists a potential for disproportionate risk.	SEIS Section 3.5.1.4 states that the BLM uses CEQ guidelines to analyze environmental justice issues associated with Gateway West. Section 3.5 of the 2013 Final EIS discusses environmental justice issues associated with all 10 segments of the project. This section of the Final SEIS notes a comment from Owyhee County similar to this comment from the State and addresses potential environmental justice issues in Owyhee County. Section 3.5.2.3 of the SEIS includes the environmental justice analysis for Segments 8 and 9 and notes Owyhee County's comment on the original Gateway West EIS. Section 3.5.1.4 explains that the CEQ guidelines indicate that U.S. Census Bureau data should be used to identify low-income populations. Section 3.5 documents how Census data were used and provides the results. As stated in the section, census data was used to identify minority populations. Both are analyzed at the county level. Alternative 1 (which the State recommends be selected) and Alternative 5 (i.e., the BLM Preferred Alternative) would cross three potential minority block groups and five potential low-income census block groups. While the preceding analysis suggests the potential presence of minority and low-

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			When evaluating whether a minority or low-income population may be adversely affected by a federal action, the EPA Guidance states that minority or low-income communities "may be missed in a traditional census tract-based analysis." [29] In such cases, the EPA guidance holds that "[a]dditional caution is called for in using census data due to the possibility of distortion of population breakdowns."[30] In the DSEIS, the BLM used only census data to complete its inadequate analysis. In fact, this issue was raised by the Owyhee County Board of County Commissioners in 2013.[31] Rather than obtaining local data to inform its analysis, BLM wrote off the concerns of the Owyhee County Board of County Commissioners by simply noting the definitions of minority and low-income communities as they applied to Owyhee County according to census data.[32] Thus, the BLM' s analysis of whether there exists a potential for disproportionate risk is insufficient. As for the second and third vantage points, the BLM does not even discuss whether communities have been sufficiently involved in the decision-making process and whether communities currently suffer, or have historically suffered, from environmental or health risk hazards in its analysis. The EPA guidance also requires analysts to examine a long list of demographic, geographic, economic, human health, and risk factors- each with associated specific variable factors- as part of their NEPA considerations.[33] In the DSEIS, the BLM looked at only three variable, demographic factors: race, low-income status, and agriculture production.[34] The BLM failed to analyze variable factors, including but not limited to, community identification, inconsistent standards, research gaps, and cultural expectations. According to EPA guidance, because the BLM failed to approach its environmental justice analysis from the three vantage points and failed to address the long list of factors that are to be included in its NEPA considerations, the BLM's environmental justice analysis is inadequate. By failing to analyze the environmental justice concerns according to EPA guidance, the BLM fails to comply with CEQ guidance in its environmental justice analysis as well. The CEQ guidance "interprets NEPA as implemented through the CEQ regulations in light of Executive Order 12898" by setting forth core principles that should supplement federal agencies NEPA analyses.[35] Rather than including all six core principles listed by the CEQ in order to publish a complete analysis, the BLM "cherry-picked" principles from the list to inadequately analyze. In particular, the BLM did not include the third CEQ guidance principle: "[a]gencies should recognized the interrelated cultural, social, occupations, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed agency action. These factors should include the physical sensitivity of the community or population to particular impacts; the effect of any disruption on the community structure associated with the proposed action; and the nature and degree of impact on the physical and social structure of the community."36 In the DSEIS, the BLM discuss nothing more than agriculture production, using "cookie-cutter" language to describe the affected population before concluding that the affected population would observe no adverse consequences from the project.[37] Therefore, BLM's environmental justice analysis is substantively inadequate according to not only the EPA guidance, but also the CEQ guidance.	income communities in the area, construction and operation of the proposed Project is not expected to have high and adverse human health or environmental effects on nearby communities.

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101612	(xi)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM relies upon analysis from the 2013 FEIS to fulfil the majority of their socioeconomic analyses for the DSEIS. Specifically relating to property values, the 2013 FEIS states that "Some short term adverse impacts of residential property values (and salability) might occur on an individual basis as a result of the Proposed Route and Route Alternatives. However, these impacts would be highly variable, individualized, and unpredictable."[38] Once again, the BLM wrote off the concerns of residential property values brought forward of the Owyhee County Board of County Commissioners. The BLM's Co-Preferred Alternative (Alternative 2) will directly impact a substantial amount of private property in an already economically disadvantaged county. Even though the BLM's own 2013 ROD for the Project specifically requires the BLM to consider the effects to local economies in more detail, the BLM specifically ignores this responsibility to inform the reader that the siting of Alternative 2 would have substantial environmental justice and socioeconomic impacts on Owyhee County. The BLM failed to comply procedurally by refusing to respond to issues raised by the public. The CEQ and EPA guidance rely heavily on public participation as a method of addressing inequity.[39] However in its analysis, the BLM has shown that environmental justice and socioeconomic concerns, like those expressed by the Owyhee County Board of County Commissioners, will not be brought to bear on the BLM' s substantive decision-making. The Owyhee County Commissioners raised several concerns regarding its large minority and low income populations in the vicinity of the BLM's Co-Preferred Alternatives. The BLM's failure to analyze the Owyhee County Commissioners' concerns is problematic because public participation, like that of the Owyhee County Commissioners, is important to the BLM's understanding of these issues as they relate to the Project at the local level. However, as mentioned above, rather than properly analyzing the Owyhee County Commissioners concerns, the BLM dismisses the concerns by citing census data and inadequate analysis presented in the 2013 FEIS.[40] The Owyhee County Commissioners have given the BLM an opportunity to avoid existing patterns of inequality through the NEPA process.[41] Unfortunately, the BLM has chosen to ignore it. The BLM has missed a chance to shape end results to better serve the public interest.	This is a supplemental EIS; it includes analysis of new information where appropriate. However, it does not repeat analysis already presented in Section 3.4 of the 2013 Final EIS that is still valid and not in need of revision in light of new information. As is standard practice, such analysis is incorporated in the SEIS by reference, as explained in Chapter 1. Socioeconomic information for Owyhee County was updated for the SEIS; however, we did not find any evidence to indicate that the analysis of property values in the 2013 Final EIS was incorrect or substantially changed such that the impact analysis required modification.
101612	(xii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Lastly, the BLM's analyses are conclusory. Quite simply, the BLM's deficient analyses are nothing but a series of unsupported statements. The BLM presents insufficient evidence to conclude that minority and low-income populations in Owyhee County will not suffer disproportionately high and adverse effects the Co-Preferred Alternatives. Accordingly, because of the gravity of the environmental justice and socioeconomic issues, the BLM must perform complete, adequate, environmental justice and socioeconomic analyses that comply with EPA and CEQ guidance, analyzes public concerns, and provides specific, sufficient evidence so that one may understand how the BLM reached its conclusion.	The FSEIS discloses impacts on low income or minority communities in Section 3.5; this section clearly lays out how the analysis was completed and what data sources used. Section 3.5.1.4 explains that the CEQ guidelines indicate that U.S. Census Bureau data should be used to identify low-income populations. Section 3.5 documents how Census data were used and provides the results. As stated in the section, census data were also used to identify minority populations. Both minority and low-income groups are discussed at the county level.
101612	(xiii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Co-Preferred Alternative 5 fails to meet the Proponent's reliability requirements. The primary purpose of the Project is to provide safe, reliable, efficient, and cost effective electric service.[42] The BLM's Co-Preferred Alternative 5 fails to comply in meeting this purpose. The BLM's Alternative 5 parallels routes 80 and 9K for 98.9 miles and unjustifiably puts the Proponents, ratepayers, citizens of Idaho, and electricity users of the Western Interconnection at risk of widespread outages due to the increased risk of fire impacting both segments of this alignment. Siting transmission lines in close proximity is not a new issue. Federal agencies understand the risks of siting transmissions lines in close proximity for long distances, and the agencies have understood that simply meeting minimum separation requirements is not adequate enough to ensure reliability.[43] For example, the BLM and the Department of Energy recognized these criteria while designating the West Wide Energy Corridor, stating that: " ... by far the most cost effective preemptive strategy against multiple simultaneous line loss involves ensuring adequate distance separation between lines at the planning stage. Experience among WECC system operators has also shown that the nature of the land between lines ... should dictate safe separation distances on a case-by-case basis ... However, in forested areas or areas where vegetation provides substantial amounts of fuel for fires, greater line spacing (up to five miles) may be necessary to prevent adjacent lines from becoming simultaneously involved in faults caused by ionized smoke." [44] The BLM even recognizes this risk multiple times throughout the document, and several routes were eliminated from further consideration due to not meeting	Evaluating system reliability is primarily the responsibility of the Proponents and technical regulatory agencies. The BLM will take comments about reliability into account when formulating a decision for Segments 8 and 9.

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			these reliability objectives.[45] However, in the DSEIS the BLM ignores these risks for the sake of developing an alternative that meets a particular political agenda and adheres to an improperly developed policy document.[46] The BLM must disregard Alternative 5 as the Agency's Co-Preferred Alternative in the Final Supplemental Environmental Impact Statement (Final SEIS) and ROD in order to ensure that the Project can provide safe and reliable electric services.	
101612	(xiv)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM fails to comply with NEPA and its own Policy by not including an adequate alternative to the SRBOP Mitigation and Enhancement Portfolio Proposal. The 2013 ROD deferred its decisions to grant a ROW for segments 8 and 9, in part due to the BLM needing time to evaluate the Proponents Mitigation and Enhancement Portfolio (MEP) Proposal. The DSEIS specified that the Proponent's proposed MEP was inadequate, and provided a Compensatory Mitigation Conceptual Model Example (Appendix K) as a framework to "to ensure that offsetting impacts to the SRBOP will lead to a net benefit to resources and values, i.e., achieve the enhancements required by the SRBOP enabling legislation." See Western Electric Coordinating Council, TPL-(001 THRU 004)-WECC-1-CR- System Performance Criteria; available at http://www.wecc.biz/Standards/WECC%20Criteria/Forms/ AllItems.aspx. U.S. Bureau of Land Mgmt., U.S. Dep't of the Interior, Final West Wide Energy Corridor Programmatic Environmental Impact Statement, 2-57-58 (2008). BLM policy specifies that the agency must notify the applicant as early as possible if mitigation is inadequate, and that the BLM must "identify and evaluate in the NEPA document an alternative(s) to the applicant's proposal."[49] The BLM failed to adhere to this policy in several instances. First, the BLM failed to notify the Proponents that the MEP package was inadequate in a timely manner. Through administrative review of the supplemental EIS afforded to Cooperating Agencies, the state of Idaho has been aware of the BLM's decision to classify the MEP as inadequate since May 2015. However the BLM failed to notify the Proponents of the inadequacies until the release of the DSEIS in March of 2016. The BLM publicly stated that they "didn't feel comfortable" selecting the Proposed Alternative as a Preferred Alternative due to an inadequate MEP.[50] The time between this administrative review, and release of the DSEIS, should have been spent collaborating with the Proponents and Cooperating Agencies to develop a MEP proposal that would meet the requirements of the enabling legislation. Instead the BLM remained silent on the issue until the release of the DSEIS. The BLM also failed to provide an adequate alternative analysis of the Proponent's proposed MEP. BLM policy states that: "[i]fthe applicant proposes specific mitigation measures as a feature of its proposed action and the BLM believes the proposed mitigation may be inadequate, then the BLM will identify and evaluate in the NEPA document an alternative(s) to the applicant's proposal."[51] The BLM's response to this requirement is extremely incomplete and unsatisfactory. The BLM identifies throughout the document areas where the MEP is inadequate, but fails to provide any alternative options. The BLM supplies Appendix K of the DSEIS, stating that "If an action alternative is selected in the Final SEIS, the BLM will fully apply compensatory mitigation analysis to the selected route alignments and present that analysis and the appropriate calculations in the Final SEIS."[52] This response fails to align with the policy directive in BLM Manual 1794, specifically stating that the BLM will identify and evaluate an alternative to the applicants proposed action, not to the action alternative that the BLM identifies in the Final SEIS. The BLM's failure to adhere to their own policy illustrates the BLM's pre-decisional approach to this project, and its failure to comply with NEPA.[53] The BLM must develop an alternative to the proponent's MEP and allow for stakeholder feedback prior to the release of the Final SEIS.	Because it is part of the Proponents' Plan of Development, the MEP is considered a set of design features and does not require a separate alternative. Between the release of the Draft and Final SEIS, the BLM collaborated with the Proponents to develop a more detailed framework for mitigation and enhancement. See Appendix K in the Final SEIS. This mitigation framework, which contains many of the elements of the MEP, now supersedes the MEP.

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101612	(xv)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM's analysis is void because BLM failed to comply with Section 202 of the Federal Land Policy and Management Act of 1976 (FLMP A). Section 202 of FLMP A requires that the BLM must "develop, maintain, and when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands."54 Standard practice provides for Resource Management Plans (RMPs) to guide resource management for 15-20 years. However, the majority of the RMPs, that provide the baseline for this project, are well over 25 years old: [table below formatted as follows: Segment -- Administrative Unit -- Applicable Plan Name -- Plan Year (Age)] 8 -- Shoshone Field Office -- Monument RMP -- 1986 (30 years) 8 -- Shoshone Field Office -- Bennett Hills/Timmerman Hills MFP -- 1980 (36 years) 9 -- Burley Field Office -- Cassia RMP -- 1985 (31 years) 9 -- Burley Field Office -- Twin Falls RMP -- 1985 (31 years) 8 -- Jarbidge Field Office -- Jarbidge RMP -- 2015 (1 year) 8 and 9 -- Four Rivers Field Office -- Jarbidge RMP -- 1987 (29 years) 8 -- Four Rivers Field Office -- Kuna MFP -- 1983 (33 years) 8 and 9 -- Four Rivers Field Office -- Morley Nelson SRBOP NCA RMP -- 2008 (8 years) 8 and 9 -- Bruneau Field Office -- Bruneau MFP 1983 (33 years) 8 and 9 -- Owyhee Field Office -- Owyhee RMP -- 1999 (17 years) The BLM is making amendments to RMPs that are so obsolete that they do not even incorporate the current administrative boundaries. For example, the DSEIS has to specify to the reader that even though the Jarbidge RMP was updated in 2015, a majority of the impacted land that was part of the prior 1987 RMP is technically part of the Four Rivers Field Office, where an RMP currently does not exist.[55] The BLM cannot possibly be making use of high quality scientific data and the best available science, as required under NEPA and BLM policy, when it's proposing amendments to RMPs that are over 30 years old and invalid.[56] The BLM must update and finalize the applicable RMPs to provide for consistent and integrated land use decisions prior to issuing the Gateway West ROW.	No BLM-managed lands fall outside of an area covered by an RMP or management framework plan (MFP); these plans remain in force until replaced or amended despite changes in administrative boundaries. It is common practice to amend RMPs/MFPs to allow authorization of uses not foreseen when the plan was last revised or originally written without full updates or plan revisions, which would require a separate NEPA/EIS process that would unreasonably delay considerations of project applications. Disclosure of all plan amendments associated with each action alternative is a major part of project-level NEPA analysis like this SEIS. Appendix F of the SEIS lists all of the plan amendments that would be needed to authorize each alternative routing for Segments 8 and 9, and these plan amendments are a factor the BLM considers when reaching a decision for the project. A decision that authorizes any routes for Segments 8 and 9 will include plan amendments that will update these plans before any ROWs are issued.
101612	(xvi)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM's Cumulative Effects Analysis is Grossly Inadequate. BLM guidance specifies that the BLM "must address the cumulative impact of each alternative" and compare them against each other.[57] This is especially important for the sake of the DSEIS, because the point of the supplementation is that that each action alternative provides unique impacts on resources. However, the BLM failed to analyze or compare the alternatives for all impacted resources in its Cumulative Effects analysis. For example, and examination of OHV access provides the following: "OHV use is increasing on public lands. OHV riders may have more opportunities available as a result of this project. New access roads used for construction and maintenance provide additional avenues for riders to gain access to locations that were previously off limits or unavailable. "[58] The BLM uses over-broad statements like this throughout the Cumulative Effects analysis to justify for not analyzing the differences between the alternatives. However, segments that cross existing undisturbed habitat, or greenfields, will likely have significantly more impacts from OHV use than segments that cross already disturbed habitat. The BLM fails to articulate this difference in the analysis, even though the difference is certainly quantifiable. The BLM is aware of how many miles of new roads (versus existing roads) each alternative will create, and could easily provide data on how many miles of new access roads may be available for OHV access, yet it fails to provide the information. This is the case for several of the resources identified in the Cumulative Effects section. The reader is completely unaware of the differences in significance between resource impacts because the BLM fails to articulate it for many of the resources. Instead the BLM relies on providing responses such as " ... the Segments 8 and 9 revised proposed routes and other routes would have temporary and permanent effects ... "[59] The BLM provides no quantitative values or comparisons so that the reader, and most importantly the decision maker, can identify and rank the severity of impacts by each alternative. In order for the reader and decision makers to take a hard look at the cumulative effects of each of the proposed segments, the BLM must provide for a comparison of each action alternative for each of the impacted resources before the release of the Final SEIS.	An updated analysis of cumulative effects is found in Chapter 4 of the SEIS. Miles of new roads for each of the alternatives are listed in Section 3.19 of the DSEIS. Table 3.17-5 lists the miles of area closed to OHV use that each route would cross. Also, Section 3.17 incorporates by reference additional information on OHV use in Section 3.17.1.5 of the 2013 Final EIS.

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101612	(xvii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM failed to collaborate. The 2013 ROD provided the BLM with the opportunity to find a consensus agreement to siting Segments 8 and 9.[60] The BLM has failed to adhere to this task. The BLM's Co-Preferred Alternatives do not provide for an agreeable route among the state and local jurisdictions. To the contrary, the BLM's Co-Preferred Alternatives are unanimously opposed by the state and local jurisdictions. Procedurally, the BLM failed to collaborate with state and local jurisdictions by failing to incorporate the applicable county plans. While the BLM identifies the Elmore County Comprehensive Plan, the BLM fails to even mention the Owyhee and Gooding County Comprehensive Plans.[61] The BLM's failure to discuss the elements of these county plans does not comply with CEQ Implementing Regulations or the tasks outlined in the 2013 ROD.[62]	The BLM collaborated extensively and at length with local and state governments and other stakeholders, and pursued consensus on siting Segments 8 and 9. County plans are considered in the 2013 Final EIS, and the SEIS supplements this analysis where conditions have changed. By design, the SEIS does not repeat all the information in the FEIS it is supplementing.
101612	(xviii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	The BLM also failed to collaborate with the Federal Energy Regulatory Commission (FERC) in regards to the Proponent's Revised Proposed Route for Segment 9. The Proponents have proposed to double circuit the Proposed Segment 9 500-kV line with the existing Bowmont-Canyon Creek 138-kV transmission line. The BLM states that the Bowmont-Canyon Creek line is under FERC authority and that the Proponents would need to obtain FERC approval to reconstruct the line.[63] An April 7, 2016 letter (attached as Appendix 1) from FERC to Idaho Power specifies that not only would FERC allow for the use of the existing ROW for a second transmission line, but they encourage it, stating that "it is reasonable to group similar uses of project lands together (i.e., adding a non-project transmission line within the project transmission line right of way would not likely introduce new or unique adverse effects to the project beyond those posed by the project transmission line)." The BLM's complete failure to collaborate with another federal entity to identify the viability of the proposed action illustrates BLM' s pre-decisional approach to this project.	The BLM Gateway West National Project Manager has been in communication with FERC concerning the Baja Road 138-kV line. The BLM has also worked with and through the Proponents to communicate with and engage FERC, and will continue to do so as appropriate.
101612	(xix)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Issues related to Wildlife The State of Idaho and the Idaho Department of Fish and Game (IDFG) reiterate the previous comments regarding the southern-most route for Segment 9. Alternative 9E would have greater adverse impacts on special status wildlife than Alternative 9D, particularly for sagegrouse. Routes 8G and 9K of the SDEIS are similar. While Routes 8G and 9K have been modified to avoid some sage-grouse habitats and leks in the vicinity of Oreana, these routes would have greater impacts to Important Habitat Management Areas (IHMA) than the Revised Proposed Route for both Segments 8 and 9.[64]	These impacts are disclosed in the SEIS (Chapter 3). Route 9E, which was analyzed in the 2013 Final EIS, has been modified to avoid Priority sage-grouse habitat. The new route is termed 9K. Sage-grouse habitat impacts are one factor the BLM will consider when formulating a decision on Segments 8 and 9 and determining appropriate mitigation for these impacts.
101612	(xx)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Alternative 1, the Revised Proposed Routes, traverses the SRBOP NCA. Raptors and corvids have been shown to utilize transmission lines and associated lattice towers for nesting, roosting, and perching.[65] The concentration of ferruginous hawk nests on the existing 500 kV transmission line north of Interstate 84 further suggests use of transmission lines by raptors within the analysis area. For Routes 8G and 9K, this could lead to increased raptor and corvid predation on sage-grouse and sage-grouse eggs. New transmission lines in the NCA (Revised Proposed Routes, Alternative 1) are not expected to adversely affect sage-grouse and may provide additional nesting, roosting, and perching substrates for raptors, the focal species for which the NCA was created. The DSEIS states that the Revised Proposed Route for Segment 9 could adversely affect the Owyhee Front/Triangle local sage-grouse population. This is an error that should be omitted. The Revised Proposed Route for Segment 9 is nowhere near the Owyhee Front/Triangle local sage-grouse population, nor does the analysis for Route 8H (the same route) contain the same assessment.	The statement on raptor and corvid use of transmission lines is congruent with analysis in the SEIS. The error regarding the Owyhee Front/Triangle local sage-grouse population has been removed from the EIS as requested.
101612	(xxi)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Potential negative effects to big game species (mule deer, elk, pronghorn antelope, and bighorn sheep) from project construction and operation are more likely to result from disturbance to wintering animals than from the presence of a transmission line assuming the proposed avoidance and mitigation measures are implemented. Disturbance on winter range in southwest Idaho is generally a result of human activities, often related to motorized access. The results shown in the SDEIS for changes in fragmentation levels between routes and alternatives is a more useful and accurate indicator of potential effects to big game than a simple measure of acres affected because roads are considered in the fragmentation assessment, but not in the acreage assessment. For example, the Revised Proposed Route for Segment 8 crosses the most mule deer and elk winter range of any route, yet the reduction in patch size is comparable to other action alternatives due to the current level of fragmentation in the area. Alternative 1, the Revised Proposed Routes, would result in the least amount of patch size reduction of any action alternative.	The amount of winter range by route is included in Table D.10-8 in Appendix D of the DSEIS. Your analysis of relative patch size-reductions among SEIS alternatives is noted and will be considered when formulating a decision on Segments 8 and 9 and determining appropriate mitigation for these impacts.

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101612	(xxii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	In summary, Alternative 1, the Revised Proposed Routes, is likely to result in fewer adverse effects to wildlife resources than the other action alternatives analyzed, primarily through avoidance of sensitive sage-grouse habitats and big game winter range, as well as a neutral or positive effect to rap tor habitats. The benefits of the co-preferred Alternatives 2 and 5 are presented as avoidance of the NCA. The avoidance of the NCA does not present a clear biological benefit for wildlife and thus, we view the rationale to avoid the NCA to be based on policy, not biology. The priority of policy versus biological benefit should be stated more clearly to clarify the BLM decision framework.	The comments on Alternatives 1, 2, and 5 are noted. The BLM must consider impacts to the full range of resources and values in the SRBOP in addition to raptor habitat. The absence of sage-grouse habitat in the SRBOP does not automatically make routes that cross more miles in that area the better or only choice for avoiding sage-grouse impacts.
101612	(xxiii)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Issues Related to Special Status Plants The DSEIS is correct that there is no threatened, endangered, or candidate plant species within or in proximity to the Analysis Area.[69] The DSEIS appropriately recognizes that slickspot peppergrass (Lepidium papilliferum) occurs within the Analysis Area and is currently being proposed for listing by the U.S. Fish and Wildlife Service (Service). In February 2014, the Service simultaneously proposed to list slickspot peppergrass as threatened and designate critical habitat under the ESA.[70] On June 5, 2014, The State submitted detailed comments to the Service opposing the proposed listing and critical habitat designation. One of the State's key arguments focused on the fact that slickspot peppergrass elemental occurrences (EOs) coincide with sage-grouse habitat. The State pointed out that the Service failed to adequately analyze the positive impacts from sage-grouse conservation efforts on slickspot peppergrass. Like with sage-grouse, fire is the primary threat to slickspot peppergrass, and the Service did not analyze the associated benefits to the plant from the numerous conservation efforts focusing on fire prevention and suppression. It has been well over two years and the Service has yet to make a decision on their 2014 proposals. For purposes of BLM's analysis within the DSEIS, the plant remains off of the endangered species list and can only be classified as a proposed species, which does not carry any regulatory weight. Regardless of the uncertainty surrounding slickspot peppergrass's status, the DSEIS is premature in determining that construction and operation of certain routes within the Analysis Area "may affect, and are likely to adversely affect, slickspot pepperergrass."[71] This type of determination is reserved for the ESA Section 7 consultation process that analyzes whether proposed federal actions may affect species currently listed as threatened or endangered.[72] Since slickspot peppergrass is not listed, such a determination is inappropriate in the NEPA context. Impacts to the plant will be de minimus if the avoidance (i.e., micrositing project facilities and/or spanning slickspots) and reclamation measures are implemented.[73] Therefore, the presence of slickspot peppergrass, whether it is listed under the ESA or not, should not impede the construction and operation of transmission lines analyzed in the SDEIS.	At the time that the DSEIS was prepared, slickspot peppergrass was proposed for listing; by policy the BLM treats proposed species the same as a listed species when evaluating impacts. On August 17, 2016, the USFWS reinstated the status of slickspot peppergrass as threatened under the Endangered Species Act, effective September 16, 2016 (81 Federal Register 55058–55084). The BLM is appropriately consulting with the USFWS on slickspot peppergrass under Section 7 of the Endangered Species Act.
101612	(xxiv)	STATE OF IDAHO, OFFICE OF THE GOVERNOR,STATE OF IDAHO, OFFICE OF ENERGY RESOURCES,CL "BUTCH" OTTER,MATT WIGGS	Issues related to Idaho Recreational Resources Alternative 1 will have the least amount of impacts to recreation resources than the other range of alternatives. Several of the other action alternatives would place Segment 9 in the Owyhee Front Special Recreation Management Area (SRMA). This area is managed for its outstanding off-highway vehicle opportunities. The area also receives most of the OHV use in Southwest and South Central Idaho. Alternative 5 would impact both Bruneau Dunes State Parks and Thousand Springs State Park (Malad Gorge Unit). The location of parallel transmission lines only 250 feet apart would greatly increase the visual impacts to both of these parks, as well as the Owyhee Front SRMA. Segment 9 will require specific micrositing when it passes by the Bruneau Dunes State Park. The Proponents and the U.S. Air Force need to work with the Idaho Department of Parks and Recreation to mitigate lighting impacts of the towers. The DSEIS fails to address the impacts that lighting of the towers will have on the park's night viewing opportunities, especially if two segments are co-located there. The BLM must provide an adequate visual resource analysis on the impacts to Bruneau Dunes State Park before the release of the Final EIS. [See PDF for Appendix: April 7, 2016 letter from the Federal Energy Regulatory Commission to Idaho Power]	Alternative 1 would cross 8 SRMAs and HMAs (a total of 50.3 miles) plus 86.9 miles of the SRBOP (Tables 3.17-8 and 3.17-17). This is considerably more than either of the Co-Preferred Alternatives identified in the DSEIS. Alternative 5 would cross the least (Tables 3.17-11 and 3.17-23). All alternatives would cross the same area south of the Bruneau Dunes SP, and required micrositing and mitigation of impacts from lighting of towers will be addressed after a decision on route selection occurs in the ROD.
101613	(i)	SUSIE KERN,DICK KERN	To be honest, I am opposed to the power line going through the state of Idaho. However, if it is to go through, then it needs to go through the original proposed route north of Bliss, and not through the scenic Hagerman Valley.	Your opposition to power lines in Idaho is noted, as is your comment that if one is needed it should be north of Bliss.

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101614	(i)	ANKARA RYSALING ORR	Transmission line development causes serious impacts, including direct damage to wildlands, wildlife habitat and cultural resources; interference with scenic vistas; habitat fragmentation; and others. Consequently, transmission lines are generally incompatible with management of the Conservation Lands absent a specific showing of how such a project would "protect, maintain, and enhance" the raptors, raptor habitat and the other purposes for which the NCA was designated. The BLM has not provided analyses that demonstrate this standard has been met for the Gateway West line. Unless BLM can demonstrate how these transmissions lines would be good for the raptors and overall NCA values, I cannot support the lines going through the SRBOPNCA.	The SEIS has not concluded that any of the routes fully meet the requirements of the enabling legislation for the NCA without extensive mitigation. Although some have argued that transmission lines benefit raptors, the NCA is not only about raptors. We do not believe that a transmission line, in and of itself, would enhance the full range of resources and values of the NCA. The BLM is evaluating whether additional design criteria and stipulations, including avoidance, minimization, restoration, and enhancement measures, can together meet the criteria for crossing the NCA. This determination has not yet been made.
101615	(i)	LISA ROSE PORTEOUS	I deeply have concern over the conservation of our wild life if this proposal is put into place. Please keep this from NOT happening.	Comment noted
101616	(i)	MICHAEL KOCHERT	After examining the seven different alternatives presented and discussed in the SEIS, the best and least impacting alternative, in my opinion, is Alternative 1. It is the most science based and feasible alternative. I believe Alternative 1 will involve using more miles of existing roads and less construction of new roads than the other alternatives, at least for the west half of the project area.	Your preference for Alternative 1 is noted
101616	(ii)	MICHAEL KOCHERT	However, a major short-coming of the SEIS is that it does not report the miles of new road construction vs the miles of existing roads for each alternative	The statement in not correct. The miles of new road construction, as well as the miles of roads needing improvement are disclosed in Table 3.19-2 of the DSEIS.
101616	(iii)	MICHAEL KOCHERT	I suggest that the BLM use another word than "impact" in the SEIS in their assessments of the effects each alternative on raptors. The way the SEIS is written, it implies that the impacts of the transmission lines on raptors will be negative within a mile of proposed routes. Based on my research and experience, the positive effects of transmission lines for raptors exceed the negative effects. The SEIS does not substantiate or justify the 1.0 mile buffer around known nests, and the application of this buffer is unclear. The SEIS does not support the assertion that raptors nesting within 1.0 mile of the proposed transmission line will be impacted. Therefore, the assumption, implied in the FEIS that raptors nesting within 1 mile of the proposed transmission line will be adversely affected is not necessarily valid.	The term "impact" is a standard and a common term used in NEPA documents. An impact (as defined in both NEPA and ESA documents) can be either beneficial or adverse.
101616	(iv)	MICHAEL KOCHERT	I found some of the description of mitigation and enhance strategies to be vague and incomplete. Without a more complete analysis of impacts, it is difficult to evaluate proposed mitigation strategies. My comments in the on the Companies' proposed mitigation and enhancement portfolio in Appendix A of the RAC report (Appendix H of the SEIS) still stand. The monitoring component as written in the mitigation/enhancement plan is extremely vague. Points 3 and 4 of my comments in Appendix H of the SEIS calling for a science based monitoring plan in an adaptive management framework still stand. The habitat restoration outlined in the BLM's proposed mitigation strategy (Appendix K) is a positive action, but enhancing raptor populations involves much more than restoring vegetation. Managing disturbance, contaminants, mortality factors, and nest site availability as recommended in the RAC report need to be addressed in the mitigation/enhancement plan. Point 5 of my RAC comments discusses installing artificial nesting platforms, and I am a bit confused by the statement about nesting platforms on page 47 of Appendix C that states "The Companies have not included this as an element of the Portfolio at this time because an agreement on advisability and placement must be reached with the USFWS and with BLM." I really don't see the problem with mentioning the platforms as a form of mitigation. Installing artificial nesting platforms is an effective way to enhance opportunities for nesting raptors. Leaving the final decisions on placement, etc up to the oversight committee seems appropriate. I believe that the SEIS should consider more the recommendations of the RAC report.	Additional information on mitigation has been added to Appendix K of this document. As discussed in that appendix, the full mitigation needs cannot be identified until a route is selected, surveyed, and designed. Impacts to resources that cannot be avoided or minimized during design phase will determine the final mitigation and enhancement needs.
101617	(i)	KYLE KIMBALL	According to your map the blue line which signifies route number 2 goes through my property. Therefore I am strongly opposed to this route. This route also is too close to the existing houses and homeowners that are right next to me. This route would basically ruin the use of my property in many ways if a high-voltage line was put in.	Note that the map is only a rough indication of the path the Project would take if approved. The line would not cross directly over any homes, and the applicant would work with the landowner to avoid impacts to the extent practicable.

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101618	(i)	KAREN STEENHOF	I am hopeful that BLM officials will reach the conclusion that Alternative 1 is the only science-based, common sense, and feasible alternative for Segments 8 and 9 of the Gateway West Project. It is the only one of the seven action alternatives that avoids adverse impacts to Greater sage-grouse and Owyhee County landowners.	Avoiding impacts to greater sage-grouse and siting routes on public land to the greatest extent possible are among the important factors the BLM will consider when formulating a decision for Segments 8 and 9. The majority of Alternatives 2 and 5 (i.e., the Co-Preferred Alternatives identified in the DSEIS) would be located on public lands in Owyhee County. Alternative 1 crosses more private land than Alternative 5 (i.e., the BLM Preferred Alternative identified in the FSEIS).
101618	(ii)	KAREN STEENHOF	The recent devastating Soda Fire makes it even more important to keep the remaining native vegetation on the Owyhee Front intact and un-fragmented.	The 2013 FEIS and this SEIS consider, analyze and disclose the impacts to vegetation under the various route alternatives for Segments 8 and 9. Best management practices and mitigation measures are also analyzed, which the BLM will consider when formulating a decision for Segments 8 and 9. In particular, ongoing development of mitigation requirements focuses attention on factors at the landscape scale, which brings conditions on lands outside the immediate project area into focus.
101618	(iii)	KAREN STEENHOF	The proposed routes within the Morley Nelson Snake River Birds of Prey Area (NCA) offer a reasonable alternative because they will follow existing roads and power lines and will minimize the need for new roads in undisturbed areas. The direct routes through the NCA will represent a savings for ratepayers, and routing the lines through the NCA will give BLM an opportunity to restore raptor and prey habitat that has been damaged by wildfire over the last 35 years. Alternative 1 is the only alternative that can be implemented in a timely manner because it is the only alternative supported by state and local elected officials.	Your preference for Alternative 1 is noted. The SEIS discloses the impacts that would occur to various resources as a result of the alternatives considered. The BLM will take these into consideration while developing their Record of Decision (ROD). The 2013 Final EIS and the SEIS considered research on the benefits to raptors in NCA. The relative benefits and negative impacts to raptor populations in the NCA are one factor analyzed in the SEIS but are not the only resource impact the BLM must consider.
101618	(iv)	KAREN STEENHOF	The Boise District BLM Resource Advisory Committee (RAC) subcommittee, comprised of a diverse group of stakeholders, recommended the revised proposed routes after 7 months of deliberation and evaluation of 12 route options for Segment 8 and 14 route options for Segment 9. They found that routes which avoided the NCA had unacceptable impacts on resources and people in Owyhee County. For some reason, the BLM chose not to include the Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options as an Appendix to the draft SEIS. It provides important information that should be considered by both the BLM and members of the public. I recommend that it be included as an Appendix to the final SEIS.	Section 2.5.2 discusses the routes considered by the RAC subcommittee. The subcommittee-majority recommended routes for Segments 8 and 9 were incorporated into the Revised Proposed Action and are analyzed in detail in Chapter 3. The subcommittee's route report was inadvertently left out of Appendix H in the DSEIS but has been included in the FSEIS. As directed in the 2013 ROD, the BLM "pursue[d]" consensus on routing Segments 8 and 9 by engaging the State and local community through the RAC and then through the multiple opportunities for involvement in the NEPA process, with the hope that this would lead to consensus. The NEPA process is not complete until the BLM issues a decision. The BLM must balance the desire for consensus with its obligations under all regulations and laws. Information in the Draft SEIS (Sec. 2.3.4) and in the Notice of Availability provide the rationale for selecting the DSEIS Co-Preferred Alternatives. The RAC's recommended routes were not the consensus of the subcommittee, as is described in the route report. The original direction to the RAC was to "determine whether there is new information and/or modifications to the alternatives analyzed in the Final EIS … that the BLM should consider that could resolve … siting

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				issues identified in the ROD," and during several subcommittee meetings, BLM-Idaho leadership and agency project managers specifically advised that any recommendations or rankings of route alignments by the subcommittee would not constitute NEPA analysis.
101618	(v)	KAREN STEENHOF	Routes 8G and 9K are unacceptable because they will require new roads across intact vegetation across scenic lands along the Owyhee Front. They will cause unnecessary disturbance to soils and shrubsteppe vegetation, as well as adverse impacts on scenic values. New roads will increase the potential for spread of noxious weeds and other undesirable vegetation, and they will increase the potential for human-caused wildfire. Increased recreational access along new roads could pose a threat to Golden Eagle (Steenhof et al. 2014, Spaul 2015) and sage-grouse populations. Routes 8G and 9K cross private land at critical places and will likely disrupt ranching operations. They will decrease property values of all landowners within 2 miles of the line. And finally, they will pose a threat to Greater Sage-grouse populations in that they will attract ravens, and nest predation rates are likely to increase (see below).	The impacts of Routes 8G and 9K on weeds, wildfire, increased access, sage-grouse, wildlife, private lands, property values, and road densities are analyzed and disclosed in Chapter 3 of the SEIS. Evaluating system reliability is primarily the responsibility of the Proponents and technical regulatory agencies. The BLM will take comments about reliability into account when formulating a decision for Segments 8 and 9.
101618	(vi)	KAREN STEENHOF	FEIS Proposed 9 (hereafter Route 9F) is unacceptable because it runs primarily on private land. It will disrupt scenic views along Highway 78, and it will decrease property values of all landowners within 2 miles of the line, particularly in and near the communities of Bruneau, Grand View, Oreana, and Murphy. It will require new roads in areas currently without infrastructure, and it could affect nesting and wintering sage-grouse within 15 miles of the route (see below).	The impacts of route FEIS Proposed 9 on visual resources, property values and sage-grouse are analyzed and disclosed in Chapter 3 of the SEIS.
101618	(vii)	KAREN STEENHOF	Alternative 2 is unacceptable because it includes Route 9F. Alternative 3 is unacceptable because it includes Route 9K. Alternative 4 is unacceptable because it includes both 8G and 9F. Alternative 5 is unacceptable because it includes both 8G and 9K. In addition, because it runs both lines close together for several miles, it does not meet the original purposes and objectives of the proponents' project, and it does meet the need for redundancy in transmission. Alternative 6 is unacceptable because it includes 9F. Alternative 7 is unacceptable because it includes 9K.	You preferences on Alternatives 2 through 7 are noted.
101618	(viii)	KAREN STEENHOF	One additional alternative that the BLM might consider is this: Revised Proposed Route for Segment 8 (8P) as is; then route Segment 9 Revised Proposed Route (9P) north from Cedar Hill along Segment 10 and then west along 8G/8H to the point where it reaches 9P. This would avoid some important sage-grouse habitat.	Your suggested route is similar to the I-84 South Alternative considered but eliminated: see Figure O-7 in Appendix O to the 2013 Final EIS and the discussion of the route in Chapter 2 of that document.
101618	(ix)	KAREN STEENHOF	I was disappointed that the draft SEIS did not present a thorough, in-depth, and comprehensive analysis of the relative impacts of each alternative. Instead of evaluating actual environmental effects, the analysis in the draft SEIS appears to be just a superficial GIS exercise, with very little ecological insight.	As a supplemental EIS, this document builds on analysis presented in the 2013 Final EIS that is still valid. Ecological information used in the Final EIS analysis of impacts for Segments 8 and 9 has not changed, while the GIS coordinates for route alignments not analyzed in the Final EIS constitutes new information that was not included or analyzed previously. Supplemented by additional analysis related to the new route alignments in the SEIS, the effects analysis in Chapter 3 of the 2013 Final EIS presents a thorough, comprehensive analysis that compares the relative impacts of each alternative.
101618	(x)	KAREN STEENHOF	The analysis of "impacts" on raptors is a case in point. It is disappointing that the entire analysis of impacts on raptors in the draft SEIS is based on two meaningless metrics: the number of known raptor nests within 1 mile of each proposed route and the number of acres within a 1-mile buffer of known raptor nests. The draft SEIS did not correct flaws in the FEIS analysis, which I pointed out in my comments on both the draft and final EIS. As I noted in my earlier comments, it is erroneous to rank impacts of various alternatives based on the total number of known raptor nests within a mile, and it is erroneous to equate the frequency or extent of impact to the number of nests within a mile of a proposed route. Whether a transmission line will adversely affect a nesting raptor depends on the species of raptor, the topography surrounding the nest, and many other factors. The draft SEIS refers to the extent or frequency of "impact"	The DSEIS uses many measures, including evaluating effects of raptor predation on greater sage-grouse leks within 2 miles, 4 miles, and 11 miles of each route centerline. The number of raptor nests within 1 mile of the proposed routes is used to evaluate project effects on raptor nesting. This distance is used because it encompasses the range of distance restrictions that were recommended by the USFWS at the time of the

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			throughout section 3.10, and it still implies erroneously that impacts on raptors nesting within 1 mile of the lines will be negative. One of the reasons that Alternative 1 has so many raptor nests within a mile is that the two proposed routes parallel existing lines that raptors have already colonized. In addition, most raptor species have more than one nest structure within their nesting territory. Golden Eagles have up to 18 (Kochert and Steenhof 2014). This is just one more reason that the number of "known nests" is a completely meaningless metric of any impact on raptor populations. The analysis of raptor impacts should be revamped and replaced with a more in-depth analysis based on the wealth of scientific data that have been collected on raptors over the past 45 years in and near the NCA. Repeated statements that "impacts would be less" with one route or alternative over another should be removed or modified. I suggest that Tables D-10-2, D-10-7, and D-10-9 be eliminated. The raptor columns in Tables 3.10-1 and 3.10-2 and the rows in Table ES-2, ES-3, and ES-4 are also misleading and should be removed. If NEPA requires BLM to report these meaningless numbers, then the final SEIS should include caveats about their extremely limited usefulness.	2013 Final EIS. Species-specific surveys are required based on USFWS buffer requirements for individual raptor species, which may vary over time. We believe that the tables you mention provide useful information for a NEPA effects analysis. Analysis of raw, longitudinal scientific data as suggested in the comment is beyond the scope of a project-level SEIS.
101618	(xi)	KAREN STEENHOF	The analysis in the draft SEIS seems to be based on artificial lines on the map rather than the ecology of the area. The fact that preferred routes skirt most of the Preliminary Habitat Management Areas for Sage-grouse (PHMAs) and Sagebrush Focal Areas (SFAs) is biologically meaningless. The draft SEIS analysis focuses on the number of leks within 4 miles of routes and never mentions ravens as a wide-ranging nest predator. The final SEIS needs to acknowledge that new steel lattice transmission towers will attract ravens to new nesting (Steenhof et al. 1993), roosting (Engel et al. 1992), and perching sites. (Coates et al. 2008) documented ravens as the most common nest predator of greater sage-grouse in northeastern Nevada. Nest failure is thought to be an important factor in sage-grouse population declines, and nest predation appears to be the primary cause of nest failure for Greater Sage-grouse. Engel and Young's (1992) radio telemetry studies revealed that ravens moved an average of 7 km (about 4 and a half miles) and as far as 65 km (about 40 miles) from transmission line roosts in southwestern Idaho each day. Given that ravens forage several miles from their nests and roosts, sage-grouse nests within 15 miles of new transmission lines will be vulnerable to ravens that roost on new transmission lines along the Owyhee Front. Perch deterrents are likely to be ineffective, and recent research from eastern Idaho (Howe et al. 2014) suggests that increases in raven populations can be associated merely with increases in the amount of "edge" in shrubsteppe habitats.	Information about raptor and corvid use of transmission lines and related effects to sage-grouse is considered and included in the impact analysis in both the 2013 FEIS and this SEIS. Scientific information is also being used to inform development of compensatory mitigation for impacts to resources in the NCA, including raptors and their habitat, and other important resources, including Greater sage-grouse.
101618	(xii)	KAREN STEENHOF	I am concerned that parts of the draft SEIS analysis present data in a misleading and biased manner. Summary tables in the Executive Summary of the draft SEIS are misleading and make the BLM's preferred alternatives look better than they are. Instead of tabulating the total miles of roads in each route, a more complete and straightforward analysis would also report the miles of new roads required by each route. Revised proposed routes in the NCA would follow existing roads for most of their length, whereas routes in Owyhee County would require new roads in scenic and relatively undisturbed areas, including a significant amount of private land. Similarly, the summary tables in the Executive Summary of the draft SEIS do not describe the quality of vegetation that would be impacted by each alternative, and the tables in Section 3.6 do not distinguish disturbed shrubland and grassland from undisturbed shrubland and grassland. Most of the vegetation that would be affected by Alternative 1 is fragmented, disturbed, and in need of restoration. Most of the vegetation that would be affected by Alternative 5 is intact and undisturbed. Much of the land that would be disturbed by Alternative 2 is agricultural. The final Supplemental EIS should explicitly compare the miles of new road and the acres of disturbed habitat associated with each route and each alternative. These statistics will clearly show that the draft SEIS has overestimated adverse impacts of Alternative 1 on resources in the NCA, and it has underestimated adverse impacts of the other alternatives on resources and communities in Owyhee County.	Section 3.19 of the SEIS – particularly Table 3.19-2 – discusses miles of new roads that would need to be constructed or improved for each alternative. Detailed information on vegetation for each route is included in Appendix D. Vegetation communities are discussed in Section 3.6, and supported by information in Appendix D. Analysis in the 2013 Final EIS and this SEIS discusses how vegetation has been degraded by fire and other factors. Analyzing the quality of grasslands crossed by the project is beyond the scope of this project-level SEIS. A new section has been added to the Final SEIS (Section 3.24) to discuss the effects of each alternative to resources in the NCA. Socioeconomic information for Owyhee County was updated for the SEIS; however, we did not find any evidence to indicate that the analysis of property values in the 2013 FEIS was incorrect or substantially changed such that the impact analysis required modification. Impacts to agricultural lands and operations are discussed in SEIS Section 3.18. Visual impact analysis is found in SEIS Section 3.2. The BLM must take into account impacts to resources in all counties potentially affected by the project when formulating a decision on Segments 8 and 9.

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101618	(xiii)	KAREN STEENHOF	Without a more complete analysis of impacts, it is difficult to evaluate proposed mitigation strategies. My thoughts on the Companies' proposed mitigation and enhancement portfolio are reflected in the RAC report in Appendix H. I support the habitat restoration outlined in the BLM's proposed mitigation strategy (Appendix K), but it is unfortunate that the BLM's strategy focused exclusively on vegetation as "raptor habitat." Enhancing raptor populations involves much more than restoring vegetation. Managing disturbance, contaminants, mortality factors, and nest site availability should part of any mitigation/enhancement plan. I was disappointed that neither the POD (Appendix C) nor the BLM's compensatory mitigation model (Appendix K) proposed artificial nesting platforms for raptors. Page 47 of Appendix C states that "The Companies have not included this as an element of the Portfolio at this time because an agreement on advisability and placement must be reached with the USFWS and with BLM." Artificial nesting platforms are the easiest way to enhance opportunities for nesting raptors, and they should be part of the transmission line design. When the PP&L 500-kv line was constructed across southwestern Idaho and southeastern Oregon in the early 1980s, PP&L, in cooperation with BLM, installed 37 nesting platforms (Nelson and Nelson 1976, Nelson 1982) on the steel lattice towers. Within ten years, 11 of the 12 platforms in southwestern Idaho were used by either Golden Eagles, Ferruginous Hawks, or Red-tailed Hawks. Artificial platforms both on and near the towers should be a part of the POD and the mitigation/enhancement plans. Another part of mitigation and enhancement should involve deterring raven nesting and perching on transmission towers. Ravens are a known predator of Burrowing Owls (J. Belthoff, unpubl. data). The double circuit design on Revised Proposed Route 9 is a step in the right direction. Biologists and engineers should work together to design towers and platforms that are friendly to raptors but not to ravens, as recommended by the RAC on Page 15 of Appendix H. Finally, mitigation/enhancement plans should include a proactive and accelerated program for retrofitting distribution lines within the NCA to reduce the potential for electrocution of raptors. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following guidelines described in the Avian Power Line Interaction Committee's publication "Suggested Practices for Avian Protection On Power Lines: The State of the Art in 2006" (APLIC 2006).	Appendix K of this FSEIS describes in detail a Framework for compensatory mitigation associated with all NCA resources, which has been developed in collaboration with the Proponents and has been reviewed by the Cooperating Agencies. The Framework applies the mitigation hierarchy to arrive at compensatory mitigation measures that are intended to enhance NCA resources determined to be impacted by the project. The Framework (1) describes how avoidance and minimization would eliminate and/or reduce impacts; (2) identifies remaining (i.e., residual) impacts to be addressed through compensatory mitigation; and (3) establishes the process to assess the compensatory mitigation obligation to achieve a no net loss, or as required or appropriate, a net benefit to resources.
101618	(xiv)	KAREN STEENHOF	Alternative 1 could be a win/win situation for raptors, grouse, landowners, and utility customers. The legislation that established the NCA directed BLM to manage the area to allow "for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats." The Omnibus Public Land Management Act of 2009 (Public Law 111-11) also allows for compatible activities and uses of the lands within the NLCS units (also known as National Conservation Lands). Properly designed transmission lines would be consistent with the enabling legislation and the more recent law, particularly when they avert alternatives that could have devastating effects on other resources. The rationale for disallowing or minimizing the extent of new transmission lines within the NCA seems to be based primarily on a new BLM rule adopted in 2012 that received very little public review and that was designed for very different types of NLCS units. BLM manual guidance should not trump existing laws, scientific evidence, and overwhelming public opinion. Please amend your manual and endorse Alternative 1.	In processing the right-of-way application for this project, the BLM must its obligations to all applicable laws and regulations, and current National-level land management policies. The relative benefits and negative impacts to raptor populations in the NCA are one factor analyzed in the SEIS but are not the only resource impact the BLM must consider. The full range of alternatives – including Alternative 1 and the No Action alternative analyzed in the 2013 Final EIS – are available to select in the ROD for Segments 8 and 9. As part of the BLM National Conservation Lands – which were Congressionally designated in the 2009 Omnibus Public Lands Management Act, the NCA is included under that system's management policies as reflected in BLM Manual 6100 et al. Amending the BLM Manual guidance for managing NCAs is beyond the scope of this SEIS.
101619	(i)	ANNETTE HINDS	I totally oppose a visible power line here (I oppose alternatives 4,5,6,7), and clearly there are acceptable alternatives that do minimal physical, ecological and esthetic damage.	You opposition to Alternatives 4, 5, 6, and 7 is noted.
101619	(ii)	ANNETTE HINDS	I endorse strongly Alternative 1, already endorsed by State of Idaho and Rocky Mountain Power, and Gateway Resource Advisory Council.	Your preference for Alternative 1 is noted.
101619	(iii)	ANNETTE HINDS	I also less strongly endorse Alternative 2, already endorsed as co-preferred BLM Route. It impacts fewer acres across sage grouse habitat.	Your endorsement of Alternative 2 is noted.

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101620	(i)	SNAKE RIVER ALLIANCE,KEN MILLER	Purpose and Need The electric energy sector, particularly in the Western United States, has undergone significant transformation in the more than eight years since environmental review scoping for this project began in May 2008. In fact, it has also undergone notable changes since scoping began for the Supplemental EIS for segments 8 and 9. Beyond the noteworthy flattening of projected load growth faced by proponents PacifiCorp and Idaho Power, other important developments in the western electric sector, including: - The increasing likelihood that some of the fossil fuel generating stations at the easternmost portions of the proposed Gateway West line in Wyoming will be retired ahead of their projected lifetimes due to regulatory, economic and utility planning circumstances; - The corresponding reduced need for such significant transmission expansion during a time of flat load growth and declining use of existing thermal resources currently requiring east-to-west transmission capacity. As outlined more specifically below, the Alliance recommends that BLM, as part of its review of this Supplemental Environmental Impact Statement, explore in more detail “The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of he scientific, cultural, and educational resources and values of the public land in the conservation area.” We recommend that BLM and the Proponents better describe how the installation of a high-voltage transmission line across this NCA adheres to the above prescriptions and how this proposed transmission line advances the purposes of the establishment of this NCA. The Alliance is not opposing this proposal at this juncture; we are instead cautioning about issues that may arise as this proposal is processed and if these issues are not addressed. Segments 8 and 9 The extraordinary conflicts inherent in this environmental review are perhaps most evident in the fact that the heart of the impacted area, the federal Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), is simultaneously home to protected natural resources and also to high-disturbance activities such as a high-voltage electric transmission corridor and sprawling military bombing and other training activities. Existing activities in the affected area have pushed the very definition of a “national conservation area” to its limits, and the fact that substantial mitigation actions demand such a high priority in this DSEIS shows the integrity of the NCA is further at risk. Such an unusual confluence of competing and incompatible land uses as those at issue with these two segments unquestionably complicates BLM’s efforts. After discussing the potential alternative routes with BLM staff and others at the Boise open house meeting, we continue to believe that, if Gateway West is eventually built out west to the Hemingway substation, the Agency’s proposed segment routes are preferable to routes that would create entirely new transmission corridors and their associated additional environmental impacts, including but not limited to disturbances of sage grouse habitat, outside the NCA. Nonetheless and regardless of the project’s proximity to existing transmission infrastructure, BLM must give priority to the Birds of Prey National Conservation Area Public Law 103-64, which established this NCA in 1993. We remain concerned that even the most robust mitigation measures required of the proponents can satisfactorily ameliorate project impacts to endangered, threatened, and other species of concern as identified by the U.S. Fish and Wildlife Service. Going forward regardless of its Record of Decision, BLM must remain vigilant to why this NCA was authorized by Congress and how the Department of Interior, as the curator of this important NCA, will ensure the NCA’s future prosperity and mission fulfillment. The Alliance has reviewed the federal legislation establishing the Snake River Birds of Prey National Conservation Area [Public Law 103-64, 103rd Congress] to “establish the Snake River Birds of Prey National Conservation Area in the State of Idaho, and for other purposes.” Upon our review of the Act contained in the public law, we do not believe the proposed routes for either Segment 8 or 9 outwardly conflict with the legislation creating the NCA. However, we remind BLM, and we expect the Record of Decision to have explored and resolved, these important provisions of Public Law 103-64. The emphasis, reflected in italics, is ours:	Your comments on the need for significant transmission expansion are noted.

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101620	(ii)	SNAKE RIVER ALLIANCE,KEN MILLER	Such an unusual confluence of competing and incompatible land uses as those at issue with these two segments unquestionably complicates BLM's efforts. After discussing the potential alternative routes with BLM staff and others at the Boise open house meeting, we continue to believe that, if Gateway West is eventually built out west to the Hemingway substation, the Agency's proposed segment routes are preferable to routes that would create entirely new transmission corridors and their associated additional environmental impacts, including but not limited to disturbances of sage grouse habitat, outside the NCA.	Your support for the proposed routes (following existing lines) is noted.
101620	(iii)	SNAKE RIVER ALLIANCE,KEN MILLER	We note BLM's caution that the Proponents' Mitigation and Enhancement Portfolio (MEP) intended to mitigate impacts to resources and values found in the NCA "lacks detail or specifics on how its goals would be achieved," and that, "Because current policies require the BLM to determine the measurable environmental benefit of mitigation, the agency is developing a model that can be used to calculate compensatory mitigation requirements in the NCA." We agree that Appendix K in the DEIS is a worthwhile beginning to address this important issue, but remain concerned that BLM's current Conceptual Mitigation Model to determine compensatory mitigation for NCA raptors and habitats lacks specificity. This makes it all the more urgent that BLM remain transparent and accountable in addressing the important MEP processes.	The BLM has worked with the Proponents to develop mitigation and enhancement for the NCA; see the revised Appendix K. The BLM will continue to work on mitigation and enhancement through project design and implementation.
101620	(iv)	SNAKE RIVER ALLIANCE,KEN MILLER	We are also not suggesting that this proposed transmission line violates the spirit or the intent of Public Law 103-64, referenced above. However, we do not see language in the law establishing this NCA that actually permits this use within this NCA. In fact, it is unclear how adding another high-voltage transmission lines advance the purposes of Public Law 103-64, which states "The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, culture, and educational resources and values of the public lands in the conservation area."	The law states that other uses may occur to the extent that they are compatible with the purposes for which the NCA was established. One objective of this analysis is to determine if the proposed project, which included mitigation, is compatible.
101620	(v)	SNAKE RIVER ALLIANCE,KEN MILLER	Regarding Segment 8, we are relieved that the Proposed Route south of Owyhee, would take the line further from impacting the Kuna area. The earlier-identified Deferred Decision Route that would have run north of Owyhee and much closer to the Kuna community was unacceptable.	Comment noted.
101620	(vi)	SNAKE RIVER ALLIANCE,KEN MILLER	Regardless of which routes are finally approved by BLM in its forthcoming ROD, we believe it is of the utmost importance that all actions taken by the Utility Proponents are thoroughly and transparently examined by a third party. If this agreement is approved, we join our colleagues in insisting that the implementation of the terms of the agreement are upheld. We expect that Proponents provide some of the financing for this 3rd-Party evaluation, particularly as it relates to promised habitat restoration [as contained in the eventual agreement] and also as it relates to law enforcement to ensure the conditions of this agreement remain intact.	Your support for an oversight group that is at least partly paid for by the Proponents is noted. Typically, the cost of environmental compliance monitors is fully funded by the proponent. See EPM G-3 in Appendix M.
101620	(vii)	SNAKE RIVER ALLIANCE,KEN MILLER	The Alliance also maintains that the Proponent Utilities must remain liable for any required restoration required by any or all disturbances, and that any such restoration is undertaken in such a way that eliminates the possibility of transmission of invasive plant or animal species.	The BLM shares these concerns. See the EPMs in Appendix M and the discussion in Section 3.8 of this SEIS regarding measures designed to avoid invasive species being introduced or existing ones being spread.
101620	(viii)	SNAKE RIVER ALLIANCE,KEN MILLER	Properly sited transmission lines are important in meeting the needs of Pacific Northwest electricity consumers. As mentioned above, we agree with the Department of Interior that "… The MEP has not yet been formally reviewed by the public…" and while we acknowledge that the MEP was described in the scoping process, we recommend nonetheless that BLM ensures that the public is provided all possible opportunities to not only further review the MEP, but that interested parties also have ample opportunities to respond to it. We expect this Supplemental EIS will provide that opportunity.	Appendix K in the FSEIS includes additional details about the mitigation and enhancement process.
101621	(i)	LESLI HINTON	The only route acceptable to me is the Alternate Route 1.	Your support for Alternative 1 is noted.
101621	(ii)	LESLI HINTON	Consideration should be taken when people's lives and their way of life is going to compromised by placing these towers on their private property. Have you thought about how expensive it will be for our farmers to move their pivot lines to accommodate these towers? Let's also think about the ground that is lost because these towers take up so much space or are impossible to drive your farm machinery around. This is encroaching upon their income. Now let's talk about how these will impact people and their livestock.	The economic impacts on farmers was analyzed by an outside agricultural specialist approved by Power and Cassia County farm groups. His analysis is included in Section 3.18 of the FEIS. Pivot irrigation systems would be avoided by placing the towers in the areas between pivots or along the edge of the field if that is not possible. The proponents would work with farmers during the design stage to limit

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				effects to farming operations and residences. Note that the County would need to permit the line on private land.
101621	(iii)	LESLI HINTON	And frankly if that small time beneath that one tower drove me nuts I can only imagine what it would do to livestock, chickens, goats, etc. Do we know what the effect is on people with pacemakers? From what I have read it could interfere with these life giving devices and kill them. And what about the bigger picture. What are the overall health risks to humans from all of this electricity passing over our heads? It can't be good for us.	Health effects to people and animals is discussed in Section 3.21 to the FEIS. Effects are strongest under the lines and fall back to normal near the edge of the ROW. Note there is no intent to place the lines over homes. The route would be designed to avoid homes, feed lots and dairies.
101622	(i)	GOLDEN EAGLE AUDOBON SOCIETY,SEAN FINN	Alternatives 3, 4, 5, and 7 GEAS is adamantly opposed to any route through relatively intact sagebrush habitat (e.g., Route 9k) even if the Segment is 'strategically' routed to skirt Preliminary Habitat Management Areas for sage-grouse and Sagebrush Focal Areas in an attempt to downplay the adverse impacts that fragmentation may have on sagebrush systems and the sensitive species that require intact sagebrush for persistence. Our position – wholly on ecological grounds – is supported by volumes of research on the ecological disruption caused by fragmenting sagebrush. We refer you to the monograph "Greater Sage-Grouse: Ecology and Conservation of a Landscape Species and its Habitats," (Knick and Conley 2011) particularly Chapter 12 "Ecological Influence and Pathways of Land Use in Sagebrush" and citations therein for a comprehensive literature review of the effects of fragmentation on sage-grouse and sagebrush systems. Removing and fragmenting sagebrush has been the primary cause of the decline of greater sage-grouse – the single most notable bellwether of the sagebrush system. Whereas we concur with BLM that special designation sage-grouse habitat should be avoided, we feel that the proposed 9k Route represents a very poor compromise because the area impacted by placing transmission lines and supporting infrastructure has a much greater spatial and ecological extent than simply the tower footprints. For example, environmental protection measure TESWL-6 (page 3.11-28) indicates that disturbance will be kept to further than 4 miles of "occupied greater sage-grouse leks". We know that ravens in this area regularly forage an average of 4 miles from roosts but may make much longer forays (Engel and Young 1992). Furthermore, female sage-grouse typically nest upwards of 2 miles from a lek center. Thus, placing transmission lines accessible to roosting ravens in near proximity to sage-grouse leks increases the likelihood of direct sage-grouse mortality through nest predation. More importantly, creating avenues through relatively intact sagebrush habitat brings along an abundance of other potential impacts that, in GEAS's opinion, are hard to justify. Transmission lines and their necessary access points bring along greater access for mammalian predators, an increased opportunity for invasive plants, and an invitation to off-highway vehicles (OHV) and other motorized uses in areas that are currently not easily accessible. BLM's own analyses assert that OHV users will expand the disturbance footprint off of access points given the opportunity. Increased invasive annual grasses coupled with increased human presence and motor vehicle use is a recipe for increased wildfire risk – a potentially devastating combination for a sagebrush system that is already highly susceptible to fire and which does not respond well to even very intensive restoration efforts (e.g., Arkle and others 2014). GEAS feels that BLM's preference to route Segment 9 in or near intact sagebrush is a poor land management decision, especially given the other available Alternatives.	Your opposition to Alternatives that cross sage-grouse habitat is noted.
101622	(ii)	GOLDEN EAGLE AUDOBON SOCIETY,SEAN FINN	Alternatives 2 and 6 GEAS supports these alternatives on ecological grounds even though we are aware of the intense social pressure opposed to these Routes. Routing Segment 9 through largely private lands along the northern Owyhee front would be expected to have minimal impact on birds and wildlife. Although the Resource Advisory Committee (RAC) Gateway Subcommittee analysis indicates these Alternatives would have unacceptable adverse impacts on resources and communities in Owyhee County, some of these impacts may be avoided by burying lines at key locations (i.e., through important viewsheds) where opposition is most intense. Regardless, GEAS would support Alternatives 2 and 6 regarding Segment 9 as it poses minimal threat to birds, wildlife and habitats.	Your support for Alternatives 2 and 6 because they avoid sage-grouse habitat even though they cross private lands is noted.
101622	(iii)	GOLDEN EAGLE AUDOBON SOCIETY,SEAN FINN	Alternative 1 The Proposed Action (Revised Proposed Routes for Segments 8 and 9) is supported by every major local stakeholder including the Proponents (and therefore has the least political resistance), is supported by the analyses of the RAC Subcommittee and unanimously endorsed by the full RAC as its preferred	Your support for Alternative 1 is noted.

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			alternative. Furthermore, this Alternative represents an opportunity that the BLM and the Draft SEIS seem to be ignoring: the singular best opportunity to fund and deliver science-based habitat restoration in the SRBOP that clearly supports the enabling legislation by recovering habitat for raptor prey. Therefore, GEAS strongly supports Alternative 1 and recommends that BLM identify it as the preferred alternative.	
101622	(iv)	GOLDEN EAGLE AUDOBON SOCIETY,SEAN FINN	The legislation that established the SRBOP in 1993 stated that its purpose was to be for the "conservation, protection and enhancement of raptor populations and habitat" while allowing “for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats.” Properly engineered and sited power lines and transmission towers have great potential to enhance conditions for raptors (Kochert and Olendorff 1999, Ledger and Hobbs 1999, Dixon and others 2013). Therefore, peer-reviewed science supports the notion that thoughtful placement of the 500-kV Gateway West line in SRBOP is not only consistent with, but supportive of SRBOP enabling legislation. The Omnibus Public Lands Management Act of 2009 is also germane to management of SRBOP and its world class raptor community. The Act allows for compatible activities and uses of lands within National Landscape Conservation System (NLCS) units. The Act states that a ‘compatible use is one that does not conflict with the values identified in the legislative language’ for each NLCS unit. Again, because research and practice has shown that properly installed transmission lines can benefit raptor populations, routing Segment 9 through SRBOP is consistent with the Public Lands Management Act language. Guidance for managing National Conservation Areas (NCA) is also provided in the 2012 BLM Manual 6220. The Manual states as the 2nd Objective guiding implementation of the policy that BLM should “Effectively manage valid existing rights and compatible uses within Monuments and NCAs”. Even though that language is clearly stated on page 1 of the Manual 6220, and there is clear empirical evidence that powerlines are a ‘compatible use’ with the ‘enabling legislation’ which calls for ‘conservation, protection and enhancement of raptor populations and habitat,’ BLM seems reluctant to accept this possibility and the multiple benefits Alternative 1 would have to raptors and the SRBOP. Sadly it appears that guidance described in Manual 6220 is not accurate or appropriately applied to the Morley Nelson Snake River Birds of Prey National Conservation Area. BLM’s interpretation of not wanting to set a precedent by allowing a transmission line within a National Conservation Area is a confusing set of logic given that there are currently several transmission lines in SRBOP and, furthermore, all 7 of the Alternatives identified in the Draft SEIS propose Routes that cross portions of the Morley Nelson Snake River NCA. Setting a precedent, therefore, should not be an issue. Actual resource damage (and the potential to mitigate it) should be the main concern. The BLM's own data have shown that 500-kV transmission lines within the SRBOP can be compatible with raptors.	Your comments on the legislation are noted.
101622	(v)	GOLDEN EAGLE AUDOBON SOCIETY,SEAN FINN	The real conundrum, in our opinion, is that BLM seems to be ignoring a very rare opportunity to set a socio-ecological precedence in order to satisfy a minor constituency and a narrow interpretation of standing policy. Whereas the Conservation Lands Foundation sees additional lines in SRBOP as an undesirable precedent based on qualitative opinion, reams of peer-reviewed scientific publications as well as locally-based knowledge, including consensus of the highly informed RAC subcommittee, indicate that 500-kV transmission lines are proven to enhance raptor nesting opportunities and therefore are (1) consistent with the enabling legislation; (2) consistent with language in the omnibus Public Lands Management Act of 2009; and (3) allowable under the 2012 BLM Manual. Placing Gateway West transmission lines in SRBOP does not ‘set a precedent’ for NCA management since there are already 500-kV and other transmission lines in the SRBOP and they have been there since SRBOP was created. Furthermore, because the Proponents are amenable to considerable investments in habitat mitigation – a process that will be guided by peer-reviewed science and local restoration ecology experts – placing lines in the SRBOP would present an unparalleled opportunity to recover habitat for raptor prey and thereby provide a net benefit to raptor populations and habitat.	The BLM engaged the local community and the RAC in a process which it hoped would lead to a consensus. The BLM must balance the desire for consensus with its obligation under the legislation that established the NCA, as well as other laws and regulations. Meeting the requirements of the NCA's enabling legislation involves more than providing for nesting and roosting habitat for raptors. Note that the BLM cannot approve a project that otherwise does not meet the requirements in order to obtain mitigation finds.
101622	(vi)	GOLDEN EAGLE AUDOBON SOCIETY,SEAN FINN	GEAS asks BLM: “why would you turn your back on this unique opportunity to support the enabling legislation and one of the most unique raptor communities on Earth?” The opportunity the Proponents provide with the Mitigation and Enhancement Portfolio – millions of dollars of investment in habitat restoration – is not likely to happen again. It has not yet in the 23 year history of SRBOP and no one has ever offered a similar opportunity for such broad-scale, science-informed restoration opportunity in any NCA to our knowledge. Passing up this opportunity now is tantamount to failing the enabling legislation and allowing further habitat degradation to the detriment of raptor prey habitat. If that poor decision was compounded by disruption to the already crippled sagebrush ecosystems (e.g., Soda Fire) by the	See the previous response.

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			addition of Route 9k along the Owyhee foothills, it would likely be recorded as one of the worst environmental management decision in the history of southern Idaho. GEAS implores BLM to support the SRBOP enabling legislation, to build upon the best available science regarding sagebrush system function and restoration ecology, to leverage the mitigation and enhancement opportunities presented by the Proponents, and to apply some common sense. Select Alternative 1 as the preferred alternative and work together with your locally invested partners and stakeholders to protect important sagebrush, enhance nesting and foraging habitats for raptors inhabiting SRBOP, and lead the community in the most promising habitat restoration opportunity we are ever likely to see in the SRBOP and in southwest Idaho.	
101623	(i)	BRIAN WHITEAR,TIFF WHITEAR	This whole power line project is ridiculous to destroy peoples private property and public land with this eye sore of easement and maintenance roads and of course the power lines just because our wonderful government thinks they can. This power line belongs in the birds of pray with the existing line, this is a no Brainer here are our reasons. 1 Why clear and grub Animal and sage grouse habitat which are becoming rare due to disease and fire when it is not necessary. 2 This is a fire hazard to the people who live here. 3 It is a eye sore. 4 It will lower the value of our homes. 5 If this corridor was here when we purchased our home I would not be here, And if it is constructed here in my backyard, I would never be able to sell and move. 6 The cost of construction seems to me it would be so much cheaper to put this eye sore with another eye sore in the BIRDS OF PREY where there is already a easement road and really not much habitat.	Your support for Alternative 1 is noted.
101624	(i)	MAX LARSON,WILMA LARSON	We oppose the Gateway West Transmission Line alternate route from Midpoint west across the Tuttle area near Hagerman (Routes 8G/8H). This route parallels an existing transmission line and crosses our farm near Tuttle, rendering approximately 25 acres of our farm very difficult, if not impossible to farm. This routing also would seriously disrupt farming for other landowners in the area and would significantly depress land values.	Your opposition to 8G and 8H because they would adversely affect your farm is noted.
101624	(ii)	MAX LARSON,WILMA LARSON	Having been residents of the area affected by the Gateway West project for most of our adult lives, and being very familiar with the routing options, we recommend Segment 9 route, north of the Snake River near Grandview and Oreana (Segment 9 Revised Proposed Route).	Your support for Revised Proposed 9 is noted.
101625	(i)	NANCY A THOMPSON	I wish to express my support for Alternative 1	Your support for Alternative 1 is noted.
101625	(ii)	NANCY A THOMPSON	my opposition to Alternatives 2 and 5.	Your opposition to Alternatives 2 and 5 are noted.
101625	(iii)	NANCY A THOMPSON	1. The revised routes were worked out by lengthy collaboration between all local parties involved.	Your support for Alternative 1 is noted.
101625	(iv)	NANCY A THOMPSON	Regarding any portions of Owyhee County: Owyhee County is a large county with a small population and a relatively small portion of the land in private ownership. An even smaller portion is irrigated agricultural land. The economic base of the county is primarily agricultural. The impact on said productive land of towers and easements for transmission lines crossing them would certainly have an economic impact, for the county as well as the land owners.	Comment noted. The proponent would work with landowners to avoid impacts to irrigation systems. The intent would be to place towers in areas between pivots and along the edges of fields. Please note that the BLM only choses the line location on federal land. Building the transmission line on private property would require county approval
101625	(v)	NANCY A THOMPSON	The sage grouse has not been listed as endangered but very strong conditions and restrictions have been imposed on people using the land in order to protect/improve the sage grouse population. The sage grouse in Oywhee County and their habitat was very affected by the extensive soda fire. Further disturbance by construction of the Gateway project could not be beneficial in any way to the sage grouse. In addition the towers would be another advantage for the ravens and other birds that prey on the grouse, giving them a great vantage point to spot the grouse.	All routes have been sited to avoid priority sage-grouse habitat in Owyhee County. A variation has been added to Alternative 5 that moves the line to the east in order to reduce effects on sage-grouse from ravens and other birds of prey that may roost on the towers. The SEIS discloses that some predation would likely occur.
101625	(vi)	NANCY A THOMPSON	Roads and transmission lines already exist in the NCA. As stated above can only be an advantage to birds of prey, while crossing private land can only be detrimental to the local area.	Comment noted.
101626	(i)	BERT BRACKETT	Alternative 2 will have unacceptable adverse impacts on the economic viability and the socioeconomic impacts on the residents and communities in Owyhee County. It is proposed to go thru the heart of the	Your opposition to DSEIS Co-Preferred Alternative 2 is noted. Socioeconomic impacts are addressed

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			prime agricultural land and the communities of Bruneau, Grand View and Oreana.	in Section 3.4 of the SEIS. Impacts to agricultural lands are analyzed in Section 3.18. Both of these types of impacts will be considered when the BLM formulates a decision for the project.
101626	(ii)	BERT BRACKETT	Alternative 5 will go thru or skirt preliminary habitat management areas for sage-grouse (PHMAs) and sagebrush focal areas (SFA) and there is no doubt it would have a negative impact on sage grouse. Construction and ongoing maintenance will be disturbance and the new power lines would attract ravens which will increase predation on sage grouse and their nests.	A variation has been added to Alternative 5 that moves the line to the east in order to reduce effects on sage-grouse from ravens and other birds of prey that may roost on the towers. The SEIS discloses that some predation would likely occur. The compensatory mitigation plan for sage-grouse impacts from the 2013 FEIS will be carried through and applied to Segments 8 and 9 where appropriate, if those segments are authorized. The SEIS finds that the 2013 plan does not adequately address indirect effects to sage-grouse and discusses additional mitigation measures that will be required. Mitigation for effects to sage-grouse must result in a net conservation gain. Although the conservation management standard for greater sage-grouse of “net conservation gain” in PHMA and IHMA from the 2015 land use plan amendments does not apply to the Gateway West Project, the BLM would seek to apply mitigation, including compensatory mitigation, to achieve an overall “net conservation gain” in connection with the Project. These mitigation measures would follow the process set forth in the Greater Sage-Grouse Habitat Mitigation Plan.
101626	(iii)	BERT BRACKETT	Alternative 1 is clearly the preferred choice with the fewest negative impacts. It would co-locate with an existing power line with existing roads in the Morley Nelson Snake Rive Birds of Prey (NCA). Most of that vegetation is fragmented and is already disturbed. The Boise District RAC also recommended alternative 1 be the preferred alternative. That committee spent many hours with diverse experts and included field tours to arrive at their recommendation. To ignore their recommendation undermines the credibility of the process and has the appearance of being pre-decisional. Selection of either of the other preferred alternatives will be strongly opposed by landowners and local government officials. Alternative 1 is the only alternative that avoids adverse impacts to sage-grouse and avoids adverse socioeconomic impacts to the citizens of Oywhee County.	Balancing the relative impacts to a range of resources along the full length of Segments 8 and 9 is the essence of the BLM’s decision on the project. The BLM sincerely appreciates the RAC’s efforts to evaluate potential impacts from Segments 8 and 9, as well as the advice of local elected officials, residents and landowners.
101627	(i)	ROBERT THOMAS	Having followed this process from the beginning, I’ve been shocked at the BLM’s intent to shove their desired location down everyone throats. At one time, the Advisory Committee came up with a proposed route primarily on BLM ground—largely in Birds of Prey. This seemed logical due to the fact that, by law the utilities corridor should be routed on Federal ground, whenever possible. Because of the fact that 75% of ground in Owyhee Co. is Federally controlled, this seemed very logical and practical. When the BLM gathered all the information, they decided to accept an alternate route that crossed our valuable irrigated ground and dissected our ranch. Not only this but their desired location is 900’ East of my house and would cross directly over a proposed 10-12 acres irrigation reservoir that we have been in the planning stages for 2 years to construct. I could only hope that the decision makers in the BLM would realize that they should not strong arm the private citizens of Owyhee and other counties within the state of Idaho. Once again, the local and practical route in this segment would be to place it in the Birds of Prey and other BLM controlled ground. In dealing with the BLM on a continual basis, I am appalled at the treatment that private citizens and ranchers receive from them. Whatever is possible, I along with others will continue to oppose your preferred route and fight you to the end.	Your opposition to routes outside the NCA is noted.

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101629	(i)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	In the ROD for the overall Project, the BLM stated, "The BLM will defer its decision to offer a ROW grant for Segments 8 and 9 due to the lack of complimentary siting preferences among federal, state, and local authorizing entities in Idaho. The BLM will immediately coordinate with these entities and Proponents to seek a consensus agreement on the transmission line alignment for these segments." BLM appears to have failed to comply with its stated intent of working with state and local entities to develop Segment 8 and 9 routes. For instance, it is not apparent to the Companies how the BLM engaged Owyhee, Elmore, Gooding and Jerome Counties.	As directed in the 2013 ROD, the BLM "pursue[d]" consensus on routing Segments 8 and 9 by engaging the State and local communities through the RAC and then through the multiple opportunities for involvement in the NEPA process. The BLM regularly engages counties through outreach by District and Field office staff in forms preferred or requested by each County. For this project, as with any involving land use planning actions and EIS-level project applications, a county may become Cooperating Agency, as several have chosen to be for Gateway West. For this project, engagement with Owyhee County is well documented. In addition, several counties with an interest in the project submitted comments on the Draft SEIS (see other entries in this Appendix). Additional engagement with Idaho counties occurs through the involvement of the State of Idaho as a Cooperating Agency.
101629	(ii)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	Alternatives 4 through 7 are flawed in that they were not proposed as part of the scope for the supplemental analysis outlined in the ROD for the original project and may not even be feasible to construct simply because BLM authorizes the portions on Public Lands. Alternatives 2 through 7 will have adverse impacts on Owyhee County private property. Alternatives 4 through 7 will have adverse impacts on private property and communities in Jerome and Gooding Counties. None of these alternatives were discussed with the Companies to determine whether they can be constructed nor was a data request provided to the Companies so that engineering review and constructability information could be supplied. Neither Owyhee County nor the state has indicated any willingness to issue state or local 2 conditional use approval to the Companies for construction of these alternatives, which calls into question the true feasibility of these alternatives simply because BLM authorizes the portions on Public Lands. The Companies consider these concerns potential fatal flaws for each of Alternatives 2 through 7.	NEPA regulations and BLM policy require an EIS to contain a range of alternatives, for which impacts and effects to resources are identified, analyzed and disclosed. The range is not limited to alternatives presented during scoping, because one of the purposes of scoping is determining whether additional alternatives are needed. In this instance, Alternatives 4 through 7 were developed as a result of information gathered during scoping for the SEIS. The 2013 Final EIS and this SEIS both acknowledge that the BLM has no authority to approve or prohibit transmission lines, or any other project, on non-federal (private) lands, even though NEPA regulations require that effects to all lands in the project area from an authorization on federal lands be analyzed and disclosed. Impacts to private lands are discussed in Sections 3.4 and 3.17, and the SEIS notes (Section 1.4.3) the authorities for authorizing ROWs on private land under Idaho law. These effects are among the factors the BLM will consider when formulating a decision for Segments 8 and 9. Comments about technical feasibility of various route alternatives are welcome and will be considered as a decision is formulated. It is not apparent that a data request is necessary for the Companies to comment in this regard.
101629	(iii)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	In August of 2014 the Companies submitted a draft Mitigation and Enhancement Portfolio (MEP) to the BLM for consideration in the DSEIS. This document addressed many of the categories of mitigation later listed by the BLM in its DSEIS document for the framework for mitigation planning. The table below summarizes the relationship of the MEP with that framework: [table below formatted as follows: BLM Mitigation Categories -- Where Addressed] Implement habitat/vegetation restoration efforts; -- Companies proposed habitat and vegetation restoration as one of several project types, proposed a method of determining the number of acres of restoration needed based on the disturbed or undisturbed condition (baseline condition) of the vegetation that would be removed or temporarily impacted by construction, and estimated a cost for that restoration	As the comment notes, beginning on Friday, May 26, 2016, the BLM and the Companies have collaborated in the weeks since the close of public comment on the DSEIS to develop a Mitigation Framework that it was agreed will supersede the MEP. The Framework is presented in Appendix K of this FSEIS.

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			based on BLM's reported success with small-acreage projects. Evaluate, maintain, enhance, or expand fuels management/fuel breaks; -- Companies' access roads serve as firebreaks. Firebreaks were considered as part of restoration work, mentioned in Oversight Committee duties. No additional funding explicitly proposed. After informal discussions with the BLM on the draft MEP, the Companies revised the MEP and prepared a January 2015 draft that included fuel management and fire breaks. The BLM advised the Companies not to submit the revision, and the Companies complied. Increase wildfire preparedness and suppression; -- During construction, Companies' equipment will be available for firefighting to local agencies as appropriate (FIRE-5). No explicit additional funding for firefighting included. The revised January 2015 draft MEP included provisions for increasing wildfire preparedness and suppression. The BLM advised the Companies not to submit the revision, and the Companies complied. Increase applied research and monitoring to inform adaptive management; and -- The Companies realize the importance of applied research and monitoring and included consideration for both in the development of a management fund to cover these and other Oversight Committee functions. Increase funding for recreation and visitor management; -- Companies proposed funding for recreation and visitor management in the MEP. Acquire private lands as deemed appropriate by the Authorizing Officer. -- BLM identified for the Companies a parcel of land whose purchase was high priority for the BLM and whose owner had been approached informally with positive results. The BLM SRBOP staff mentioned this parcel because it was highly likely to have cultural resources as well as important raptor habitat. The BLM asked the Companies to keep the specific information confidential and the Companies complied, but used that parcel, and its acreage and estimated comparable values as shown in the 2014 real estate market in the area, as the estimated cost for the purchase. The intent was to use this purchase as an additional means of protection for cultural resources in addition to the visitor education and management and in addition to the full compensatory mitigation to be provided through the Segment HPTP. Increase funding to law enforcement; -- The BLM's SRBOP staff suggested, in early discussions on the MEP, those law enforcement efforts that focused on the known problems of illegal exploding target use (a known source of wildfire in the SRBOP) and on illegal off-road vehicle use could be very effective in reducing that use. The Companies therefore proposed a limited law enforcement presence because the intent was to eliminate a particular set of illegal behaviors through targeted law enforcement and education of local communities. Increase cultural resource interpretation and preservation measures. -- Companies are committed to the development of a Segment HPTP that fully compensates for any adverse effect on historic properties eligible for or included in the NHRP. Methods may include cultural resource interpretation or preservation. No additional funding was explicitly proposed in the MEP because Section 106 requirements will be fully met (e.g. full compensation). In the DSEIS, the BLM found the MEP inadequate and incomplete and has proposed an alternative approach, a "mitigation framework", to provide both compensatory mitigation and enhancement for the objectives and values for which the NCA was designated. The Companies understand that the mitigation framework and the resultant mitigation and enhancement plans for habitat, recreation and visitor management, and for cultural resource protection and enhancement, will supersede and substitute for the MEP. The Companies met with the BLM on Friday, May 27, 2016 to discuss the path forward in respect to mitigation and enhancement for the Project and specifically as it relates to the NCA resources. As a result of the meeting the Companies look forward to working with the BLM on mitigation and enhancement opportunities for habitat, recreation and visitor management, and cultural resources.	
101629	(iv)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	As part of its outreach efforts described above, the Companies have expended a substantial amount of effort towards the siting of the Project to address stakeholder concerns. The alternative routes in the DSEIS disregard years of proactive steps taken by the Companies to avoid and minimize potential Project impacts. The initial proposed route for the Project interconnected 11 substations between Glenrock, Wyoming and the Hemingway Substation located southwest of Boise, Idaho with the intent of avoiding as many environmental constraints as possible. This initial route was modified, altered, updated, re-routed,	The BLM acknowledges and appreciates the Companies' efforts to develop route alignments that account for -- and avoid where possible -- the many resources present on lands in the project area. This work resulted in previous authorization of routes on public lands for 8 of the 10 segments of the original project. The presence of critical resources in the

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			revised, and refined in an iterative process through a feedback loop that among other things incorporated the following steps: • Identification and data collection of routing opportunities and constraints; • Focused field reconnaissance in key selected areas to supplement existing data; • Identification and evaluation of alternative proposed routes and/or substation sites; and • Consultation with stakeholders, landowners, local counties, tribal representatives, the BLM, USFS, and other federal agencies to address their issues and concerns. This combination of constraint mapping, field reconnaissance, and stakeholder input was used to confirm the feasibility of existing or planned corridors, including established utility corridors such as the Section 368 Energy Act West-Wide Energy Corridors (WWEC, BLM et al. 2008). Where no existing or planned corridors existed, a Linear Routing Tool was used to identify initial "greenfield" corridors for further evaluation (Idaho Power and Rocky Mountain Power, 2009). In several cases, alternative routes were developed to avoid land use conflicts, recreation sites, historic trails, cultural resources, Greater sage grouse leks, raptor nests, wildlife concentration areas, and many other constraints.	area for the remaining two segments -- namely greater sage-grouse habitat and the SRBOP -- represents a set of additional concerns that the BLM must account for when considering alternatives for those routes. Avoidance and minimization measures the Companies have already proposed are included and analyzed as design features in the SEIS.
101629	(v)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	The Companies are concerned about future applications of mitigation measures that may require further re-routing. Such measures should only be done in finite circumstances after careful consideration of the full suite of potential resource impacts and when not contrary to prior adjustments made in response to concerns of the public, stakeholders, regulatory agencies, and landowners. This is especially concerning because the DSEIS appears to promote a misconception that changing the route or location of a structure or associated facility is an isolated event. In fact, every re-route and adjustment necessarily kicks off an iterative design process that must account for many factors and can have a ripple effect that impacts multiple Project features. For example, moving one structure may require several other structures up and down the line to be moved in order to meet standard transmission line design principles. This is especially profound when the suggested changes require replacing an in-line structure with an angle structure (or multiple angle structures), which not only costs significantly more money (angle structures can quickly increase project costs by the millions), but also requires more materials, larger foundations, and yet more changes to access and service road alignments. The Companies request that the BLM recognize that any new routes, and any route adjustments presented, need to be evaluated carefully and in concert with the Companies. The Companies encourage collaboration with the BLM to address any such suggestions as the Plan of Development becomes more refined.	The Companies' involvement in developing the Mitigation Framework is intended, among other things, to help coordinate engineering changes and route adjustments associated with mitigation and/or micrositing. Cooperation and collaboration of this kind will continue throughout the process described in the Mitigation Framework (see Appendix K), up to and including issuing any Notices to Proceed for ROWs that may be authorized.
101629	(vi)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	The WECC is the Regional Entity responsible to the Federal Energy Regulatory Commission for coordinating and promoting bulk electric system reliability in the Western Interconnection. The WECC carries out responsibilities and exercises rights of a Regional Entity organized on an interconnection-wide basis pursuant to Section 215 of the Federal Power Act. Both Companies are current members, and as members are obligated to abide by the bylaws of the WECC, all standards or decisions of the WECC as well as their enforcement provisions. As an analogy, Section 215 of the Federal Power Act is to the WECC as the Endangered Species Act (ESA) is to the U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration. Just as the BLM must abide by Section 7 of the ESA, the Companies must abide by WECC's bylaws, standards, decisions and enforcement provisions. When the BLM is planning for new projects, they must consider the affects the ESA has on their projects just as the Companies must consider the affects new projects have on existing electrical pathways performance and ratings. Just as violations of Section 7 of the ESA may result in penalties, violations of WECC's bylaws, standards, and decisions may likewise result in penalties.	Chapter 1 of the SEIS discusses the various regulatory jurisdictions for this project. As a multiple use land management agency itself, the BLM recognizes the multiple obligations the Companies have in a complex project like Gateway West.
101629	(vii)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	The Final SEIS needs to show the application of a consistent rationale for alternatives considered for detailed analysis versus alternatives eliminated from further consideration. For example, the Final SEIS should indicate in detail the BLM's rationale for a) not resolving resource conflicts (citing which resource conflicts) compared to the Proposed Action, b) being substantially similar to another alternative already being considered in detail (noting which alternative and explaining the similarities), c) being technically or economically infeasible (describing why the Companies would not or could not construct the Project should that alternative be selected), d) not considering private, local and state agency comments on siting and ability to obtain local permits. The Final SEIS also needs to provide better rationale regarding its conclusions about the benefits of different alternatives. For example, it is not clearly stated in the document why paralleling an existing line is not beneficial nor is the use of helicopter-assisted construction techniques explained in terms of its	Rationales for selection of preferred alternatives and for any alternatives ultimately selected will be included in the FSEIS and ROD, as appropriate and as required by NEPA regulations.

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			limitations, criteria for its application, or its impacts. The DSEIS also commonly describes mileages of an alternative within certain habitats as a justification without a clear comparison to the Proposed Route; it is left to the reader to assume the basis of the comparison (multiple locations including Section 2.4.1.3).	
101629	(viii)	ROCKY MOUNTAIN POWER,IDAHO POWER COMPANY,ROD FISHER,MARK STOKES	The Companies' overall Project siting approach was to use the WWE corridor, other designated ROW corridors, and existing utility corridors where feasible, unless there was a compelling need to avoid an environmental constraint that drove the proposed route outside those corridors. This approach is consistent with a general public land management policy of avoiding new linear corridors and where feasible, closely paralleling existing electric transmission lines. The attached Table 1, using data presented in the DSEIS, compares the Companies' Proposed Revised Routes (Alternative 1) to the BLM co-preferred Alternatives 2 and 5. The analysis shows that Alternatives 2 and 5 have a greater impact (dark gray shade) for many resources, especially in greenfield routes in Owyhee County as compared to the Alternative 1.	Use of WWE corridors and other existing ROW corridors has been a siting criterion for this project from the beginning. The BLM will consider this factor in balance with various other siting criteria and its obligations to all applicable laws and regulations, and land management policies at the National level.
101629	(ix)	Rocky Mountain Power (Rod Fisher)	This may not meet operations' requirements as alternative access may not be available or restoration may be unreasonable. Consider the following change shown in red: "It may be necessary to build construction access roads on sensitive soil areas, including highly erosive soils, steep slopes or near NHT trails. These construction roads would be restored and an alternative access route would be designated for operations where possible and reasonable."	"where practicable" has been added to the text. Practicable is defined in the FSEIS Glossary (Chapter 6) as able to be done or put into practice successfully.
101629	(x)	Rocky Mountain Power (Rod Fisher)	Refer BLM to should consider APLIC data on avian mortality. "Avian mortality was estimated in 1987 to be over 250 birds per mile of transmission line per year in the Netherlands (as quoted in Erickson et al. 2005 and Manville 2005)."	Both the FEIS and this SEIS do consider APLIC data.
101629	(xi)	Rocky Mountain Power (Rod Fisher)	BLM has approved and accepted the MBTA mitigation plan for Wyoming portion of Segment D since the original FEIS and ROD was issued. This should be referenced somewhere in this SDEIS as it was stated that the MBTA mitigation plan for Idaho would be based on the Wyoming plan already approved for the other segments. "The Proponents have committed to mitigation actions/plans for impacts to migratory birds (as discussed in detail in Section 3.10 – General Wildlife and Fish). This required mitigation includes the Migratory Bird Habitat Mitigation Plan, which addresses mitigation for impacts to woodland habitats"	The BLM appreciates the Applicants' collaboration to with our agency to develop the Migratory Bird Treaty Act (MBTA) compensatory mitigation plan for Segment 1-7 and 10. The BLM will address the MBTA compensatory mitigation framework for segments 8 and 9 in the upcoming SEIS ROD.
101629	(xii)	Rocky Mountain Power (Rod Fisher)	Insert "air quality and " between "affect" and "climate"	Change made.
101629	(xiii)	Rocky Mountain Power (Rod Fisher)	Add ", if at all" at the end of the sentence. Many of the questions in this 1.10.2 are prefaced with "how," which in many cases wrongly presumes an effect or condition.	According to 1.10 (page 1-37), all of the questions in 1.10 "were identified from public scoping conducted for the SEIS."
101629	(xiv)	Rocky Mountain Power (Rod Fisher)	Clarify what constitutes "wildlife recreation."	Change made
101629	(xv)	Rocky Mountain Power (Rod Fisher)	It asks about impacts to water resources along Segment 8, from MP 126 to the Hemingway Substation. Consider whether that is the only stretch in both Segments that may be potentially impacted.	According to 1.10 (page 1-37), all of the questions in 1.10 "were identified from public scoping conducted for the SEIS."
101629	(xvi)	Rocky Mountain Power (Rod Fisher)	It asks how the "alternatives" will affect sage-grouse. Were the Revised Proposed routes for Segments 8 and 9 not already thoroughly analyzed in the FEIS and subsequent Habitat Equivalency Assessment as to how sage grouse are impacted?	According to 1.10 (page 1-37), all of the questions in 1.10 "were identified from public scoping conducted for the SEIS."
101629	(xvii)	Rocky Mountain Power (Rod Fisher)	This is an incomplete sentence, and needs rephrasing.	Change made.
101629	(xviii)	Rocky Mountain Power (Rod Fisher)	This is an incomplete sentence, and needs rephrasing.	Change made.
101629	(xix)	Rocky Mountain Power (Rod Fisher)	The text describes the course of the Summer Lake Option 1 route, but it is difficult to envision the route without it being better reflected on an illustrated map, and Figure 2-1 and Appendix A-2 do not provide much assistance in envisioning the route. Consider including a more-detailed map of the Summer Lake Option 1 route.	For detailed description of the routes eliminated from detailed study, please refer to the Boise District RAC Report on Gateway West 8 and 9 Route Options In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area.
101629	(xx)	Rocky Mountain Power (Rod Fisher)	Delete "will" and replace with "may need to."	The BLM appreciates the Applicants' collaboration to with our agency to develop the Greater Sage Grouse compensatory mitigation plan for Segment 1-7 and 10, which also addresses the indirect effects to Greater Sage Grouse. The BLM will address the Greater Sage Grouse compensatory mitigation framework for segments 8 and 9 in the upcoming SEIS ROD.

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101629	(xxi)	Rocky Mountain Power (Rod Fisher)	It asserts that approval of a proposal that is not in conformance with the existing land use plan requires a plan amendment, and then references the BLM Handbook as authority for that assertion. Instead, it should reference as authority the regulation from the Code of Federal Regulations (43 CFR 1601?) that requires such a plan amendment.	We agree that the authority for land use planning policy stated in the BLM Land use Planning Handbook H-1601-1 is the federal regulations in 43 CFR 1610.
101629	(xxii)	Rocky Mountain Power (Rod Fisher)	BLM should explain how the italicized change ("Allow a 500-kV transmission line ROW outside existing corridors.") is consistent with the original Plan language ("Do not permit power lines to the west or the east of the two corridors.").	A land use plan amendment will change the original land use plan language. For a detailed description of proposed land use plan amendments, see refer to Appendix F.
101629	(xxiii)	Rocky Mountain Power (Rod Fisher)	Consider deleting the word "decisions" and replacing it with "provisions."	The Visual Resource Management “provisions” are actually land use plan decisions. If a land use plan decision modified is recommended, a proposed land use plan amendment must be included in the FSEIS.
101629	(xxiv)	Rocky Mountain Power (Rod Fisher)	The Draft Amendment language of "subject to authorized use" is vague. BLM should elaborate.	The phrase “subject to authorized use” is broad in order to be applicable to the wide variety of uses authorized on the public lands by the BLM.
101629	(xxv)	Rocky Mountain Power (Rod Fisher)	Reference is made to Figure F-4, however, it appears the reference should be to F-4a.	Change made
101629	(xxvi)	Rocky Mountain Power (Rod Fisher)	The text asserts that "This Amendment would also be needed for a small section of land crossed by the Segment 9 Revised Proposed Route/8H alignment, just south of the SRBOP." However, Figure F-6 does not reflect the need for the Amendment for this small section. Explain the apparent inconsistency.	It is correct that Figure F-6 does not reflect this amendment for the Segment 9 Revised Proposed Route/8H alignment, which are contained in Alternatives 1, 6, and 7. Figures in Appendix F of the DSEIS show land use plan amendments for the two Co-Preferred Alternatives identified in the DSEIS (i.e., Alternatives 2 and 5).
101629	(xxvii)	Rocky Mountain Power (Rod Fisher)	Load, IRP and NTTG and WECC planning all refer to 2011 plans. Consider using instead the more recent Company IRP data.	In order to be consistent with the original FEIS, the FSEIS is also referencing the Load, IRP and NTTG and WECC 2011 plans.
101629	(xxviii)	Rocky Mountain Power (Rod Fisher)	Geotechnical investigation has been completed for Segment D, only in June 2010 This needs to be made clear in the SEIS.	Change made.
101629	(xxix)	Rocky Mountain Power (Rod Fisher)	Construction would occur between 2017 and 2020. Consider updating this information.	The date range has been updated based on new information sent by Rocky Mountain Power in their 2015 IRP.
101629	(xxx)	Rocky Mountain Power (Rod Fisher)	The project objectives should recognize that the Proponents have proposed this split because of the need to serve customers along each route and to increase system reliability.	Subsection 2.4 No Action Alternative only provides a quick summary and not a complete list of all of the project objectives.
101629	(xxxi)	Rocky Mountain Power (Rod Fisher)	The Proponents' 2013 POD assumed the ground disturbing activities would begin in 2017, and that the Proponents' would complete construction by the in-service date of 2020. Though likely accurate as it is stated in the 2013 POD, the dates are no longer accurate. Consider updating the relevant information.	The date range has been updated based on new information sent by Rocky Mountain Power in their 2015 IRP.
101629	(xxxii)	Rocky Mountain Power (Rod Fisher)	FEIS Proposed Route Description. This route is not displayed in Appendix A.	The route descriptions for FEIS Segments 8 and 9 are located at Section 2.3.1.1. FEIS Segment 9 route is portrayed on Figure A-3. FEIS Segment 8 route is not portrayed in Appendix A since that route is not included in any of the seven route alternatives.
101629	(xxxiii)	Rocky Mountain Power (Rod Fisher)	The BLM identifies Alternatives 2 and 5 with inclusion of the Toana Road Variation 1 as the Co-Preferred Alternatives for Segments 8 & 9. Should be: BLM identifies Alternative 1 as the Preferred Alternative.	The BLM will include Toana Road Variation in any preferred alternative(s) in the Final SEIS.
101629	(xxxiv)	Rocky Mountain Power (Rod Fisher)	Tables in 3.6-1 - 3.6-16 do not differentiate between native grasslands and annual/disturbed grasslands. Since native grasslands were identified as a key issue (3.6.1.2) this differentiation is important to understanding the level of impact occurring within each alternative. Consider addressing native grasslands and annual/disturbed grasslands separately.	These tables are simply summary tables. The full vegetation types (which includes the differentiation between native and disturbed grasslands) can be found in the tables in Appendix D. The Appendix D tables are referenced in the Section 3.6.
101629	(xxxv)	Rocky Mountain Power (Rod Fisher)	SEIS states that Alt 1 has the highest potential for introducing invasive plant species within the SRBOP because more of the alignment would be in the NCA. However, the level of direct disturbance (Table 3.8-	Alternative 1 would impact more of the SRBOP. It has the highest risk of spreading weeds within the

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			1) indicates that only 158 acres of natural vegetation would be disturbed in the NCA. Two other alternatives are higher than that. Alt 1 does have the most acres of previously disturbed acreage, but using that as an indicating of invasive species introduction in not valid. These areas already have invasive species. Implementation of the EPMs will likely reduce the level of invasive species versus pre-project conditions, given the large amount of disturbed ground. BLM should explain whether Alt 1 could result in a lower net level of invasive species than the other alternatives.	SRBOP (as stated in the text referenced in this comment). The risk of spreading weeds project-wide (including areas outside of the SRBOP) is assessed in Section 3.8.
101629	(xxxvi)	Rocky Mountain Power (Rod Fisher)	Both Alt 2 & 5 will have more impacts to sage-grouse habitat than the proposed routes (Alt 1). BLM should address the comparison of sage-grouse habitat impacts and why BLM might select, if that's the case, Alt 2 & 5 over the proposed route despite the comparison of sage-grouse habitat impacts.	Impacts to sage-grouse habitat is one of many impacts and associated mitigation measures the Authorized Officer must evaluate when making a decision on which alternative to approve, if any.
101629	(xxxvii)	Rocky Mountain Power (Rod Fisher)	"There is a potential that cumulative impacts to the visual settings for some cultural resources would occur due to the establishment of a corridor and the subsequent construction of additional transmission lines." This does not seem to meet the requirement that a cumulative effect be based on a reasonably foreseeble activity. Explain why these impacts should be considered reasonably foreseeable and included in the cumulative impact analysis.	The list of reasonably foreseeable projects is included in Section 4.2. This is a general statement, which is supported by Section 4.2.
101629	(xxxviii)	Rocky Mountain Power (Rod Fisher)	The statement that "Path capacities are usually limited by the line in the path with the least capacity" is not true.	Text has been deleted
101629	(xxxix)	Rocky Mountain Power (Rod Fisher)	The 2017 year is incorrect. The year should say 2016.	Change made
101629	(xl)	Rocky Mountain Power (Rod Fisher)	Address each of the following concerns: Alternative 5, although minimizing the land impacts by placing the lines in a common corridor, offers too much risk for the project proponents, undermining the total projects purpose and need. Alternative 5 is significantly longer than the other alternatives, adding significant cost to the project. Alternative 5 also results in two 500 kV lines in a common corridor for nearly the entire length of the line. The project proponents were willing to accept some limited risk associated with short distance siting in a common corridor, but 150+ miles of common corridor offer significant risk to the electrical benefits of building two transmission lines. Alternative 5 appears to be offering the project proponents one route for two transmission lines, rather than two routes for two transmission lines.	Although Alternative 5 does not provide as much separation as other alternatives, Alternative 5 does meet the WECC minimum separation of 250 feet.
101629	(xli)	Rocky Mountain Power (Rod Fisher)	Should Read Mitigation and Enhancement Portfolio, not *Enchantment*	Change made
101629	(xlii)	Rocky Mountain Power (Rod Fisher)	Remove "especially for renewable energy" from "The demand for electricity, especially for renewable energy, would continue to grow in the Proponents' service territories."	No change made. This text was developed in response to public scoping and agency comments. We know of no evidence that this statement is not accurate.
101629	(xliii)	Rocky Mountain Power (Rod Fisher)	Provide a citation or reference to "Where the transmission line would cross the SRBOP, participants in internationally attended horse endurance rides held annually in the area for the past 10 years may be affected if potential route changes are required to avoid the transmission line. In addition, potential transmission line–related impacts to visual resources could affect the recreation experience for those participating."	Information on this activity was submitted by the public as a comment to the EIS. BLM recreation staff confirmed that these events occurred. Also, videos of the events were reviewed on the Web at the time the information was presented.
101629	(xliv)	Rocky Mountain Power (Rod Fisher)	Generally, potential land use concerns such as the Cove non- motorized area, military operation areas, and recreation parks --- are found to not inhibit use of these areas.	A plan amendment would be required to cross the Cove non-motorized area, as is discussed in the SEIS. The Proponents correctly avoided the military areas and parks to the extent practicable, as is discussed in Chapter 2.
101629	(xlv)	Rocky Mountain Power (Rod Fisher)	Based on co-preferred routes, BLM would require fewer land use plan amendments with alternative 4 and 5. Address how BLM considered the comparative scope of these plan amendments in making its alternative selection.	The need for plan amendments was one component considered in determining the Preferred Alternatives. Many other factors contribute to the determination of Preferred Alternative selection. DSEIS Section 2.3.4.1 states the reasoning for selecting Alternative 2 with the Toana Road Variation 1 as a Co-Preferred Alternative. DSEIS Section 2.3.4.2 states the reasoning for selecting Alternative 5 with the Toana Road Variation 1 as a Co-Preferred Alternative.

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101629	(xlvi)	Rocky Mountain Power (Rod Fisher)	Alternative 2 has greater impacts to land use resources, although more of the alternative would be within the energy corridor. Additional 8 miles of ag land. Address how BLM considered these comparative impacts in making its alternative selection.	Alternative development is discussed in Section 2.3. The impact to land use resources is one of many impacts and associated mitigation measures the Authorized Officer must evaluate when making a decision on which alternative to approve, if any.
101629	(xlvii)	Rocky Mountain Power (Rod Fisher)	Alternative 2 has the greatest impacts to irrigated ag during both construction and operations. Alternative 5 has the lowest impacts, compared to all other alternatives. Address how BLM considered these comparative impacts in making its alternative selection.	Alternative development is discussed in Section 2.3. Impacts to agriculture is one of many impacts and associated mitigation measures the Authorized Officer must evaluate when making a decision on which alternative to approve, if any.
101629	(xlviii)	Rocky Mountain Power (Rod Fisher)	This section relates to updating the Jarbidge RMP (resource management plan) due to conflicts and concerns of impacts to cultural and visual resources. Further review by those specialists may need to be required. Currently, the project is in conflict with that the RMP states and edits would be required. Explain in more detail the necessary plan amendments, if any.	A ROD on the Revised Jarbidge RMP was published on September 15, 2015. The Project would be consistent with management objectives for the 2015 RMP Planning area, provided all requirements/stipulations are followed. There were a few areas covered by the old RMP that are not covered by the new RMP. These areas are still managed under the 1987 Jarbidge RMP. A consistency review was conducted which has identified four potential amendments in these areas, depending on the selected alternative (Alternative 1 would need all four). These amendments are discussed in Section 3.2
101629	(xlix)	Rocky Mountain Power (Rod Fisher)	The BLM Co-Preferred Alternatives would require similar efforts to amend the SRBOP RMP as would the Revised Proposed Route Alternative. The time and effort required to make land use plan amendments should be no more difficult. The major difference is that the Co-Preferred Alternative does not cross the Snake River Canyon or CJ Strike SRMA and would not require any amendments to those land use plans. Address how BLM considered the comparative scope of these plan amendments in making its alternative selection.	DSEIS Co-Preferred Alternative 2 would require three plan amendments; two addressing the same issue (Utility corridors), but in different locations, and one for sensitive plant species. DSEIS Co-Preferred Alternative 5 would require two amendments; one for utility corridors and one for sensitive species. The Revised Proposed Routes for Alternative 1 would require eight amendments to the SRBOP RMP; five and six more amendments than either co-preferred alternative. These additional amendments include measures to change management within SRMA areas, VRM Classifications, and restricted areas. The VRM re-classification would require extensive analysis and careful micrositing to ensure that cultural landscapes are not adversely affected beyond allowable levels for the historic trail classification. Reclassification would occur in two areas of the SRBOP NCA; near the C.J. Strike Reservoir, as well as towards the western end of the NCA, in the Snake River Canyon.
101629	(l)	Rocky Mountain Power (Rod Fisher)	Alternative 1 and 2 would require amendments to the Bennet Hills/Timmerman Management Framework Plan (MFP). This does not make Alternative 2 any more preferable for BLM in terms of plan modifications. Address how BLM considered the comparative scope of these plan amendments in making its alternative selection.	Alternatives 1 and 2 follow the same alignment through the Bennet Hills/Timmerman Hills MFP Planning Area and thus would have the same impacts to this Planning Area. Alternative 1 results in greater impacts within the SRBOP and more sensitive resource effects on public lands overall (such as crossing more VRM Class II areas and require amendments to the SRBOP to cross VRM Class II lands, historic trails, recreation areas and result in more ROW development outside of existing

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				corridors), due to the Segment 9 Routing. An alternative comparison has been added to each of the amendment sections, describing the relative overall impacts compared to the individual plan impacts.
101629	(li)	Rocky Mountain Power (Rod Fisher)	Alternative 1 and 2 would require amendments to the Kuna Management Framework Plan (MFP). This does not make Alternative 2 any more preferable for BLM in terms of plan modifications. Address how BLM considered the comparative scope of these plan amendments in making its alternative selection.	Alternatives 1 and 2 follow the same alignment through the Kuna MFP Planning Area and thus would have the same impacts to this Planning Area. However, Alternative 1 results in greater impacts within the SRBOP and more sensitive resource effects on public lands overall (such as crossing more VRM Class II areas and require amendments to the SRBOP to cross VRM Class II lands, historic trails, recreation areas and result in more ROW development outside of existing corridors), due to the Segment 9 Routing. An alternative comparison has been added to each of the amendment sections, describing the relative overall impacts compared to the individual plan impacts.
101629	(lii)	Rocky Mountain Power (Rod Fisher)	Alternative 1 would be more preferable as amendments are not required for the Bruneau MFP, while Alternatives 2 and 5 would require updates to this plan. Address how BLM considered the comparative scope of these plan amendments in making its alternative selection.	Although Alternative 1 would not require and amendment for the Bureau MFP Planning Area, it would cross more VRM Class II areas and require amendments to the SRBOP to cross VRM Class II lands, historic trails, recreation areas and result in more ROW development outside of existing corridors .
101629	(liii)	Rocky Mountain Power (Rod Fisher)	The PA was recently modified. Rely on and cite the most recent version.	The most recent PA has been cited in the FEIS.
101629	(liv)	Rocky Mountain Power (Rod Fisher)	Field work is supposed to reevaluate sites--why was this not done? It complicates future work. If there is a reason for not reevaluating, please discuss the reason and how reevaluation will occur. In Chapter 3, it sounds as though some field work was done that included condition and if they were "contributing elements," i.e. eligible. Consider clarifying or explaining in more detail the purpose and scope of re-evaluating the sites.	Cultural resource field work was completed for new portions of route options that were not previously analyzed in the FEIS.
101629	(lv)	Rocky Mountain Power (Rod Fisher)	This section reads as though the NHT is the only resource. The PA and subsequent mitigation plans will address all effected resources. Please write this to reflect that.	Section 3.1 only discusses National Historic Trails. Section 3.3 discusses other cultural resources.
101629	(lvi)	Rocky Mountain Power (Rod Fisher)	It would be helpful to list the wild and scenic rivers, or reference a list.	No congressionally designated wild and scenic rivers are crossed by any route option for either Segment 8 or 9. Salmon Falls Creek is the only wild and scenic river eligible waterway crossed by either Segment 8 or 9. None of the Snake River wild and scenic eligible segments are crossed by either Segment 8 or 9.
101629	(lvii)	Rocky Mountain Power (Rod Fisher)	Clarify that: If a cultural resource is a historic property, then there is no need to consult with the SHPO on eligibility since by definition a historic property is eligible.	The BLM must consult with SHPO on all eligibility determinations.
101629	(lviii)	Rocky Mountain Power (Rod Fisher)	Address the Idaho Centennial Trail.	The Idaho Centennial Trail is discussed in Section 3.2.
101629	(lix)	Rocky Mountain Power (Rod Fisher)	Explain the difference between an IOP and a KOP. It is confusing to have two points functioning the same way, especially when they seem to be used interchangeably later in the document. Consider using only the term KOP, if possible.	Terms are defined at first use in the SEIS not separately in each section. They are also defined in the glossary and the full name is printed in the list of acronyms.
101629	(lx)	Rocky Mountain Power (Rod Fisher)	Address the Oregon Trail Comprehensive Management and Use Plan (NPS 1981).	The BLM manages the Oregon National Historic Trail according to the current BLM land use plans crossed by this trail.

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101629	(lxi)	Rocky Mountain Power (Rod Fisher)	Explain why the analysis unit suddenly balloons to 15 miles, especially when the analysis area was previously described as 5 miles. It seems it would be more appropriate to divide the 5 mile analysis area into fore- , middle-, and backgrounds, since the 15 mile analysis area artificially inflates the amount of the trail requiring "analysis."	As stated in the SEIS: "Due to the lack of available VRI data for the trails, the AU viewshed was established to a distance of 15 miles from the respective trails to facilitate the VRI centered on the Oregon NHT and North Alternate Study Trail."
101629	(lxii)	Rocky Mountain Power (Rod Fisher)	This section spends a lot of time further confusing KOP and IOP, but doesn't really define or explain other things used in the process. For example, what is a Class A scenery as listed in Table 3.1-2? Explain the difference between an IOP and a KOP, and consider using a single term, if possible.	The two terms have different meaning and different uses. An IOP is used as part of an official inventory analysis for the BLM, while a KOP is used for a general visual impact analysis.
101629	(lxiii)	Rocky Mountain Power (Rod Fisher)	Please explain how a transmission line in front of a wind farm accentuates the impact--after all, the windfarm was built to generate electricity and it's vertical elements in front of other vertical elements.	As stated in the SEIS, the addition of the transmission line to an area that currently contains a windfarm would add to the existing visual impact of the windfarm.
101629	(lxiv)	Rocky Mountain Power (Rod Fisher)	Is the ownership for Upper Salmon Falls correct? The only state land is the Hagerman Wildlife refuge, and records do no indicate any trail remnants in the refuge. Ownership for Canyon Creek Stage Station is listed as private, but it was listed as owned by the BLM in the last paragraph on the previous page. Also, there are intact ruts on private property in the C.J. Strike area.	The BLM recently acquired the Canyon Creek Stage Station. This information has been added to the FSEIS.
101629	(lxv)	Rocky Mountain Power (Rod Fisher)	Explain whether the trail connects with the Castleford Road. Or did BLM mean the Tuana Road?	Change made.
101629	(lxvi)	Rocky Mountain Power (Rod Fisher)	The Three Island Crossing State Park also has an interpretive center/museum on the north side of the river adjacent to the camping area.	This information has been added.
101629	(lxvii)	Rocky Mountain Power (Rod Fisher)	Idaho Power records indicate that 10EL1372 wsa determined eligible with multiple identified contributing elements.	This information has been added.
101629	(lxviii)	Rocky Mountain Power (Rod Fisher)	Lockman Butte is definitely a former shield volcano--there are numerous examples in the area. See Malde et al. 1963.	This information has been added.
101629	(lxix)	Rocky Mountain Power (Rod Fisher)	IPC records indicate that the record for 10OE6025 includes multiple segments of the South Alternate, including many that are considered contributing.	This information has been added.
101629	(lxx)	Rocky Mountain Power (Rod Fisher)	The C. J. Strike Reservoir and Dam are historic, having been completed in 1952. Although a formal determination has not been made, Idaho SHPO has indicated that they think it is eligible.	This information has been added.
101629	(lxxi)	Rocky Mountain Power (Rod Fisher)	It appears that some of the information used in this section of the SDEIS is out of date. Wind farms have been constructed on private property on the plateau between Alkali Creek and Hot Springs Creek, significantly impacting the area's setting. Consider the impacts that these wind farms might have on the analysis in the Final EIS.	Section 3.1 discusses those wind farms that actually impact national historic trails, as originally analyzed in the FEIS.
101629	(lxxii)	Rocky Mountain Power (Rod Fisher)	IPC does not understand the assertion that the Pioneer and Blair Trail reservoirs are associated with the NHT. They are both 20th- century creations. The Blair Trail reservoir is so named because Ray Blair and Lee Trail worked together to build it, and used it to irrigate some Desert Land Entries on the southern edge of the plateau. The reservoir was completed circa 1955. Although older than the Blair Trail Reservoir, the Pioneer Reservoir is still a 20th- century feature, built in 1910. It was also built for irrigation storage. Consider the impacts that this information might have on the analysis in the Final EIS.	The text has been revised
101629	(lxxiii)	Rocky Mountain Power (Rod Fisher)	There is no such thing as "Emigrant Reservoir." The small reservoir on Little Canyon Creek is a result of the diversion dam built to divert water into the Blair Trail Reservoir. The area is known as "Emigrant Crossing," perhaps because the Oregon Trails crosses Little Canyon Creek. Again, the Blair Trail system was built in 1955 by Roy Blair and Lee Trail to irrigate some Desert Land entries the men had. There is no provided interpretation for the trail at either location. Blair Trail Reservoir has been stocked with fish by IDFG and also has a reputation as a good birding location. Consider the impacts that this information might have on the analysis in the Final EIS.	The text has been revised
101629	(lxxiv)	Rocky Mountain Power (Rod Fisher)	The Idaho Chapter of OCTA has been pretty active in the area. Consider whether the lack of Carsonite posts could be from vandalism and range fires. OCTA has also installed a number of interpretive signs along the trail in this area in recent years. Consider the impacts that this information might have on the analysis in the Final EIS.	Section 3.1 discusses interpretive signs.
101629	(lxxv)	Rocky Mountain Power (Rod Fisher)	The Snake River is to the south, not the north. Bonneville flood boulders would only be located down by the Snake River-- stream rolled gravels on the top of the Plateau are related to the Bruneau formation and are many 100,000s of years older. Consider the impacts that this information might have on the analysis in the Final EIS.	The text has been revised

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101629	(lxxvi)	Rocky Mountain Power (Rod Fisher)	Many wind towers have been built on the private farms in this area in recent years, also detracting from the trail's historic setting. Consider the impacts that these wind farms might have on the analysis in the Final EIS.	Section 3.1 discusses the impact of wind farms on the visual setting of national historic trails.
101629	(lxxvii)	Rocky Mountain Power (Rod Fisher)	Explain what a compensatory mitigation measure is. Explain who gets the check.	The BLM is currently in the process of developing compensatory mitigation options. See Appendix K to this document.
101629	(lxxviii)	Rocky Mountain Power (Rod Fisher)	If you're going to cite Franzen (1981), you may also want to include Gehr et al. (1982). Plew (2008) also provides an overview of the Snake River Plain (A revised 2000 version of the reference cited later in this section).	Franzen (1981) was sufficient for the purposes of the FSEIS analysis.
101629	(lxxix)	Rocky Mountain Power (Rod Fisher)	The Toana Freight Road is listed on the NRHP.	Toana Freight Wagon Road was added to the National Register of Historic Places in 2006.
101629	(lxxx)	Rocky Mountain Power (Rod Fisher)	The district has a name: The _____ Archaeological District.	The national register historic district within the SRBOP extends along the course of the Snake River for over 24 miles and across four counties.
101629	(lxxxi)	Rocky Mountain Power (Rod Fisher)	C.J. Strike Hydroelectric Power Plant. IPC cultural staff is in the process of making an eligibility determination for the power plant. IPC intends to determine the plant eligible as part of a dam district. In addition, IPC has recorded and evaluated a number of other transmission and distribution lines in or near several of the alternates. Please feel free to contact the IPC staff if necessary. Consider the impacts that this information might have on the analysis in the Final EIS.	This information has been considered in the FSEIS.
101629	(lxxxii)	Rocky Mountain Power (Rod Fisher)	Spillway Bridge. A couple of years ago, IPC cultural staff made a determination of eligible as part of a proposed district for this bridge. Idaho SHPO concurred. Consider the impacts that this information might have on the analysis in the Final EIS.	The C.J. Strike Spillway Bridge is discussed in Section 3.3 – Cultural Resources.
101629	(lxxxiii)	Rocky Mountain Power (Rod Fisher)	Consider addressing U.S. Highway 93. It has been determined eligible for listing.	Section 3.3 discusses US Highway 93.
101629	(lxxxiv)	Rocky Mountain Power (Rod Fisher)	There is some potential for diatomaceous earth along some of the routes. This includes some past exploration activity. Diatomaceous earth is locatable.	To date, no known impacts to diatomaceous earth have been identified.
101629	(lxxxv)	Rocky Mountain Power (Rod Fisher)	Explain whether there any paleontological sites already identified on any of the routes. Shouldn't those be mentioned, summarized, and discussed, if not here, then perhaps during the alternative route discussions?	Important fossil occurrences in Southwest Idaho are discussed.in Section 3.13. Impacts to paleontological resources will be handled according the Paleontological Resources Protection Plan.
101629	(lxxxvi)	Rocky Mountain Power (Rod Fisher)	Although the area does not contain mining methods associated with subsidence, it does contain lava caves. Explain whether there is any possibility of collapse/subsidence around lava caves.	Collapse or subsidence of lava caves was not raised as an issue by the public. The chance of collapse or subsidence of lava caves is negligible.
101629	(lxxxvii)	Rocky Mountain Power (Rod Fisher)	The effects of blasting seem to be a bit overblown. The blasts are well controlled and contained. Reconsider the nature and scope of the impacts of said blasting.	The SEIS currently states that: "The results presented in the FEIS indicated that blasting in Segments 8 and 9 would not affect otherwise unstable areas; therefore, the effects from blasting are not analyzed further in this SEIS."
101629	(lxxxviii)	Rocky Mountain Power (Rod Fisher)	Consider including a discussion of landslide risk.	The risk of landslides is currently assessed in Section 3.14.
101629	(lxxxix)	Rocky Mountain Power (Rod Fisher)	There is a lot of verbiage concerning impacts from the project with very little actual analysis of potential cumulative impacts. Consider editing down this discussion to focus on the cumulative impacts.	Section 4.4 has an analysis of cumulative impacts.
101629	(xc)	Rocky Mountain Power (Rod Fisher)	There is a lot of verbiage concerning impacts from the project with very little actual analysis of potential cumulative impacts. Consider editing down this discussion to focus on the cumulative impacts.	Section 4.4 has an analysis of cumulative impacts.
101629	(xci)	Rocky Mountain Power (Rod Fisher)	The statement "The relatively small footprint of the several projects when compared . . ." appears to be contradicted by the previous sentence that states that there are no other project proposed. Please explain this apparent inconsistency.	Change made.
101630	(i)	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,NATIONAL AUDUBON SOCIETY, ROCKIES,NADA CULVER,DALY EDMUNDS,CRAIG GEHRKE,JOHN ROBISON	We have submitted comments throughout the process for this project and have raised a number of issues for consideration, which were not fully addressed in the Draft SEIS. Accordingly, we are attaching and incorporate by reference our scoping comments dated October 14, 2014, and previous comments dated October 12, 2012.	The initial FEIS For the Gateway West project was published in April 2013. Scoping comments submitted in 2014 were used to identify the issues to be considered in the SEIS. The purpose of an SEIS is to address substantial new information relevant to a pending proposed land use after an

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				initial EIS is finalized. Information from the initial EIS which has not changed is not reanalyzed in the SEIS, and analysis from the initial EIS is incorporated in the SEIS by reference.
101630	(ii)	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,NATIONAL AUDUBON SOCIETY, ROCKIES,NADA CULVER,DALY EDMUNDS,CRAIG GEHRKE,JOHN ROBISON	1. The co-preferred alternatives are not a workable approach and do not support meaningful public engagement. In the Draft SEIS, BLM has identified Alternatives 2 and 5 as "co-Preferred Alternatives" instead of identifying a Preferred Alternative for the route of the Gateway West Transmission Line. Because, BLM is presenting two alternatives with fundamentally different approaches and without indicating how they might be further evaluated, BLM has undermined the opportunity for meaningful public input. Currently, BLM's planning regulations dictate that the agency evaluate the range of alternatives and then "develop a preferred alternative… (which) shall be incorporated into the draft plan and draft environmental impact statement." 43 C.F.R. § 1610.5-7. The need to identify a preferred alternative in a draft RMP amendment is reiterated in BLM's Land Use Planning Handbook (H-1624-1), which explicitly requires that the agency develop a preferred alternative in the context of plan revisions and amendments. The preferred alternative is "the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors"; and the purpose of the preferred alternative is to improve public participation by identifying the "lead agency's orientation," which allows interested stakeholders to comment most effectively. See, Council on Environmental Quality's (CEQ) NEPA's Forty Most Asked Questions (available at https://ceq.doe.gov/nepa/regs/40/40p3.htm). In the Draft SEIS, Alternatives 2 and 5 have important variations in route and effects: Alternative 2 is the shortest length of all the alternatives (291.9 miles), reduces impacts to greater sage-grouse habitat and is located within the NCA for 35.1 miles, also making use of a designated West-wide Energy Corridor that was identified as a priority for locating transmission lines. Draft SEIS, pp. ES-11 – ES-12. Alternative 5 is the greatest length of all the alternatives (321.5 miles), but has the shortest length inside the NCA (19.7 miles) and also minimizes impacts to greater sage-grouse habitat, although considerably less than Alternative 2. In this case, identifying more than one preferred alternative and deferring identification of the agency's proposed direction is confusing and deprives the public of understanding how BLM might reconcile its competing concerns to ultimately select a proposed route. The BLM is essentially depriving the public of the ability to "focus their comments on the alternative which the agency was likely to recommend," which would in turn deny the agency the best available public input. See, e.g., American Motorcyclist Ass. v. Watt, 534 F. Supp. 923, 935 (C.D. Cal. 1981) (The court further found that the omission of a preferred alternative in the draft EIS "prejudiced plaintiff's ability to comment upon and participate…"). These co-preferred alternatives are not gradations of a coherent approach, which would benefit from more in-depth public comment. Recommendation: The BLM should fulfill its obligations under applicable law and guidance by identifying a single preferred alternative, with an explanation of how this alternative best addresses the important policy priorities at stake in the proposed routes. The BLM should then provide a further opportunity for public comment.	CEQ regulations provide for the selection of co-preferred alternatives. Information in the Draft SEIS (Sec. 2.3.4) and in the Notice of Availability provides the rationale for selecting the Draft SEIS Co-Preferred Alternatives. The BLM had a sincere interest in obtaining and analyzing public comments on the two various approaches the Co-Preferred Alternatives represent. Identifying Co-Preferred Alternatives in the Draft SEIS was intended to illustrate the BLM's obligation to balance all applicable laws and regulations, and land management policies at the National level with the interests and concerns of stakeholders at all levels.
101630	(iii)	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,NATIONAL AUDUBON SOCIETY, ROCKIES,NADA CULVER,DALY EDMUNDS,CRAIG GEHRKE,JOHN ROBISON	2. Applicable mitigation policies impose substantial requirements. Since BLM commenced this supplemental analysis of Segments 8 and 9 of the Gateway West Transmission Line, additional guidance has been issued regarding the agency's approach to mitigation. Secretarial Order 3330, the report to the Secretary of Interior from the Energy and Climate Change Task Force and BLM's current mitigation guidance (IM No. 2013-142 and Draft Manual Section 1794) all direct BLM to incorporate mitigation strategies into planning. More recent guidance in the form of the Presidential Memorandum: Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment (2015) and the Department of the Interior's Landscape-Scape Mitigation Manual (2015) also emphasize the importance of mitigation in BLM planning and decision-making. Key elements of these policies are summarized below and should be incorporated into BLM's mitigation strategies for the Gateway West Transmission Line: • Landscape-scale approach: land use planning for conservation and energy development as well as analysis of proposed development and consideration of mitigation must use a landscape-scale approach to focus development in low-conflict areas and prioritize conservation in areas with important and sensitive resources and values.	FEIS Appendix C-3 describes the Approach and previous Framework (Section 2.1 and 2.1.1). Section 3.11.2.6 of the FSEIS provides a brief summary of the HEA, which is the foundation of how greater sage-grouse compensatory mitigation will be determined. For extended documentation on how the HEA functions and provides net conservation gain, see Appendix J (J-2, in particular). "MD LR 12: PHMA (Idaho and Montana) and IHMA (Idaho), and GHMA (Montana only) are designated as avoidance areas for high voltage transmission line and large pipeline ROWs, except for Gateway West and Boardman to Hemingway Transmission Project. All authorizations in these areas, other than

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			• Mitigation hierarchy: the mitigation hierarchy of avoid, minimize, and offset through compensatory mitigation must be employed sequentially, with an emphasis on avoidance as the most important and effective step in the hierarchy. • "Irreplaceable resources": avoidance is the most appropriate tool for addressing "irreplaceable resources," "resources recognized through existing legal authorities as requiring particular protection from impacts and that because of their high value or function and unique character, cannot be restored or replaced." • No net loss of important resources and values: mitigation must achieve a goal of no net loss of important resources and values, with a net benefit goal as required or appropriate. • Climate change impacts and resilience: agencies must identify and promote mitigation measures that help address climate change impacts and resilience. • Compensatory mitigation standards: compensatory mitigation (generally comprising of acquisition, restoration or preservation of resources and values) must be: o Durable: protected against non-conforming uses like development and lasting as long as the impacts); o Additional: demonstrably new conservation benefits that would not occur without mitigation; o Be developed based on the best available science: including for determining equivalency of impacts and mitigation benefits; o Provide for public transparency: including tracking locations of impacts and mitigation actions; and o Include monitoring and adaptive management. Recommendation: The current mitigation obligations have been further defined by recent guidance. BLM should ensure that these standards are met in the mitigation proposed for impacts to the NCA and greater sage-grouse habitat, as discussed in further detail below.	the following identified projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in MD SSS 29 and MD SSS 30 of this document. The BLM is currently processing an application for Gateway West and Boardman to Hemingway Transmission Projects and the NEPA review for this project is well underway. Conservation measures for GRSG are being analyzed through the project's NEPA review process, which should achieve a net conservation benefit for the GRSG." Prior to the sage-grouse listing determination, the BLM, USFWS, and state wildlife agencies collaborated on an evaluation of the entire project's greater sage-grouse effects analysis and mitigation measures via the Conservation Objectives Team report checklist. The checklist highlighted those areas that were deficient (i.e., indirect effects of "avoidance" and "increased avian predator presence and predation"). Although the conservation management standard for greater sage-grouse of "net conservation gain" in PHMA and IHMA from the 2015 land use plan amendments does not apply to the Gateway West Project, the BLM would seek to apply mitigation, including compensatory mitigation, to achieve an overall "net conservation gain" in connection with the Project. These mitigation measures would follow the process set forth in the Greater Sage-Grouse Habitat Mitigation Plan. Drawing on the ability to adapt future methods (Section 2.1.3 specifically points out the adaptive capacity of the compensatory mitigation process as new science/methods/techniques become available during the finalization of the permitting process), the BLM and USFWS drafted a white paper (Assessing Indirect Effects of Transmission Lines of Greater Sage-Grouse for the Gateway West Interstate Transmission Line Project [June 4, 2015]) and sent a joint memo (dated June 11, 2015) to the Proponents alerting them of the deficiency and providing potential methods to address the excluded indirect effects identified in the checklist. Since issuance of the joint memo, further collaboration between the BLM, USFWS, state agencies, and the Proponents has led to a modification of the suggested supplemental methods (see Technical Advisory Group Greater Sage-Grouse Mitigation Guidance for the Transwest Express and Energy Gateway South Transmission Line Projects, August 2016) which (upon final

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				approval expected soon and based on recommendations that will be provided to the Wyoming State Director) will be adapted for Idaho-specific circumstances and ultimately adopted (assuming concurrence from ID OER) for Segments 4 (Idaho) through 10.
101630	(iv)	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,NATIONAL AUDUBON SOCIETY, ROCKIES,NADA CULVER,DALY EDMUNDS,CRAIG GEHRKE,JOHN ROBISON	3. BLM has not adequately addressed its obligations to protect the resources of the Snake River-Birds of Prey NCA. a. BLM has not shown how it complied with applicable statutory language and agency guidance on managing the NCA. The BLM is legally required to manage the NCA for the "protection, maintenance, and enhancement of raptor populations and habitats" and "the natural and environmental resources and values associated therewith, and of the scientific cultural, and educational resources and values." 16 U.S.C § 460iii-3(b)(7). More recent guidance regarding management of the BLM's National Conservation Lands supplements the statutory direction and directly addresses transmission lines, heightening the BLM's obligations. Secretarial Order 3308 expounded on these conservation standards by stating, "BLM shall ensure that the components of the [National Conservation Lands] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values." In 2012, the BLM released Manual 6220, which includes specific guidance on granting new rights-of-way through units of the National Conservation Lands. In fact, the Manual creates a presumption the BLM will not approve new rights-of-ways in National Monuments and National Conservation Areas. The manual states: "To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designation or authorizing use of transportation or utility corridors within Monuments an NCAs." Accordingly, the manual provides that in revising land use plans for Monuments and NCAs, the BLM will consider: a. Designating the Monument or NCA as an exclusion or avoidance area; b. Not designating any new transportation or utility corridors with the Monument or NCA if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the Monument or NCA was designated; c. Relocating any existing designated transportation and utility corridors outside the Monument or NCA. Consequently, based on statutory language and agency guidance, in selecting a preferred alternative, the BLM must show that the siting, construction and maintenance of a transmission line through the NCA protects, maintains or enhances: 1) raptor populations and habitat; and 2) natural, environmental, scientific, cultural and educational resources and values. Further the BLM must address how it has complied with this guidance and is still siting portions of the Gateway West Transmission Line in the NCA. Instead of doing so, BLM only cites this Manual for the premise that "The BLM's policy manual on the management of NCAs (Manual Section 6220) also requires mitigation for impacts from ROWs." See, Draft SEIS, pp. 3-4, 4-2. The agency has not completed the specific analysis required by the guidance. The BLM has not selected a preferred alternative, nor has the agency justified any selected route or shown how such a route complies with its bedrock obligations regarding management of the Snake River-Birds of Prey NCA.	The Final SEIS has added a separate section to Chapter 3 (Section 3.24) to discuss NCA values, which the BLM fully agrees it is legally required to manage as directed by Congress in P.L. 103-64 and management policies as reflected in BLM Manual 6100 et al. (see Chapter 1). The analysis in this SEIS evaluates how well the project would meet statutory, regulatory and policy requirements under each action alternative and with mitigation measures described in Appendix K. Alternative 5 -- one of the DSEIS Co-preferred Alternatives -- illustrates route alignments that avoid crossing the NCA to the maximum extent possible.
101630	(v)	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,NATIONAL AUDUBON SOCIETY, ROCKIES,NADA CULVER,DALY EDMUNDS,CRAIG GEHRKE,JOHN ROBISON	b. The mitigation and enhancement approaches in the Draft SEIS are not sufficiently developed. At the outset, as discussed above, BLM's selection of a preferred alternative, must show why the route of the Gateway West Transmission Line cannot avoid the NCA and how its siting will ultimately protect and enhance the resource of the NCA. The Draft SEIS purports to provide an Enhancement Package in Appendix C (Proponents' Mitigation and Enhancement Portfolio), but this appendix does not actually set out sums that apply to either of the co-Preferred Alternatives, instead analyzing the previous proposed and preferred alternatives from the draft. The Mitigation and Enhancement Portfolio (MEP) must be updated to reflect the alternatives actually under consideration. Further, BLM acknowledges that the Proponents' MEP "does not provide sufficient details or specifics for development of such mitigation actions related to habitat restoration" making it "unclear how the MEP goals would be achieved." Draft SEIS, p. ES-10. BLM then appropriately acknowledges that its current guidance requires that the agency "determine the measurable environmental benefit of proposed mitigation." Id. In the context of the NCA and applicable guidance, we would note that the National	The BLM is not planning to implement the Proponents' compensatory mitigation proposal (DSEIS Appendix C). The Framework presented in Appendix K supersedes this proposal and includes a description of oversight mechanisms with respect to the SRBOP. With respect to the SRBOP, while it is not intended to be a site-specific mitigation plan, the Framework presented in Appendix K of this Final SEIS (1) discusses to the level of detail possible at this stage of the process how avoidance and minimization would eliminate and/or reduce impacts; (2) identifies

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			Conservation Lands should first be considered as "irreplaceable resources" where avoidance should be prioritized. In addition, any mitigation measures must meet the standards of being durable, additional, based on best available science, transparent, and including monitoring and adaptive management. Any version of the Mitigation and Enhancement Portfolio incorporated into the SEIS must meet all of these standards. The version in Appendix C to the Draft SEIS does not. We support BLM's conclusion that further mitigation for the impacts to the resources and values of the NCA beyond the approach in the Proponents' MEP. A mitigation plan can meet the criteria summarized above, in addition to meeting BLM's obligation to protect and enhance NCA resources. Unfortunately, instead of providing a mitigation plan, BLM commits to: "… continue to work with applicable stakeholders to identify the impacts that would remain on the SRBOP after implementation of the EPMs and MEP, … then design a mitigation plan that addresses these applicable remaining impacts… and will contain components that will ensure that impacts to resources and values on the SRBOP that require mitigation are fully compensated for, as well that enhancement of these resources is provided in order to comply with the enabling statute of the SRBOP." Draft SEIS, p. ES-11. The Draft SEIS even addresses categories of mitigation measures being considered to address remaining impacts to vegetation resources in the NCA, including restoration, fuels management, wildfire preparedness, research and monitoring and acquisition of private lands. Id. The Draft SEIS also references a "Conceptual Mitigation Model that the BLM may follow when 6 calculating habitat restoration treatment–related mitigation requirements," which is set in Appendix K. While we generally support the approach set out in Appendix K, it is only characterized as something BLM "may follow" and, in addition, only applies to mitigation for raptor habitat. Draft SEIS, p. K-2. A mitigation plan should address impacts to all the resources of the NCA. Deferring this mitigation plan to a later unspecified date and process is not acceptable. As discussed above, current guidance directs BLM to address mitigation as part of planning and decision-making. Fully evaluating compensatory mitigation in this SEIS is consistent with the National Environmental Policy Act (NEPA), agency guidance and relevant case law. NEPA requires that BLM discuss mitigation measures in an EIS. 40 C.F.R. §§ 1502.14, 1502.16. NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. See 40 C.F.R. §§ 1502.14(a), 1508.25(c). This evaluation extends to considering more environmentally protective alternatives and mitigation measures. See, e.g., Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094, 1122–23 (9th Cir. 2002) (and cases cited therein). Draft Manual 1794 states that "BLM will consider and analyze proposals for mitigation through the NEPA process." Draft MS-1794 at 1.6(D)(17)(a). The agency guidance directs that when compensatory mitigation may be necessary, but the applicant proposes none, "BLM will analyze the applicant's proposed action and the proposed action with mitigation, in separate alternatives." Draft MS-1794 at 1.6(D)(17)(e). In the context of the Gateway West Transmission Line, in order to rely on compensatory mitigation to address the impacts to the NCA, BLM must develop and provide a specific plan. Recommendations: BLM must show how it has complied with its obligations to protect and enhance the NCA in siting a route that crosses the NCA, including in selecting a Mitigation and Enhancement Portfolio and in developing additional compensatory mitigation. The MEP in the Draft SEIS must be updated to reflect a preferred alternative (and at least the current co-Preferred Alternatives) and to show how it will actually contribute some mitigation and enhancement to the resources of the NCA. Further. BLM must develop a mitigation plan to address the impacts to the NCA that will not be addressed by the Proponents' MEP. These documents should be provided for public comment and must be incorporated into the Proposed RMP Amendments and ROD for the Gateway West Transmission Line.	remaining (i.e., residual) impacts to be addressed through compensatory mitigation; and (3) establishes the process for assessing the compensatory mitigation obligation to achieve a no net loss, or as required or appropriate, a net benefit to or enhancement of resources. Once the final routes are selected in the Record of Decision (assuming that the No Action alternative is not selected), the Proponents will complete final engineering and design for the project. Next, a working group, which would include representatives from the BLM and the Proponents and potentially others as appropriate under applicable statutes and regulations, will apply the Framework to the final engineering and design for the approved routes to determine 1) the remaining direct and indirect impacts and 2) the site-specific suite of compensatory mitigation measures. The working group will then use these results to produce a compensatory mitigation plan to achieve a no net loss, or as required or appropriate, a net benefit enhancement to resources on the BLM public lands within the SRBOP. Within the NCA, the compensatory mitigation plan goal will be to enhance the resources and values for which Congress designated the NCA in 1993 in Public Law 103-64. That working group will submit the compensatory mitigation plan to the BLM Authorized Officer for his/her approval. The approved compensatory mitigation plan will then be implemented along with or prior to the Notice(s) to Proceed. Three types of compensatory mitigation for the Framework and eventually the Compensatory Mitigation Plan as outlined in Appendix K are: 1. Habitat which includes vegetation restoration, fuels management and fuel breaks, wildland fire preparedness and suppression, applied research and monitoring for adaptive management, land acquisition 2. Recreation and Visitor Services which includes recreation, visitor services, environmental education, visual resources, law enforcement, and potentially land acquisition. 3. Cultural Resources and National Historic Trails (non-Sec. 106) which includes addressing Tribal concerns, interpretation, preservation measures, and potential land acquisition.

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101630	(vi)	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,NATIONAL AUDUBON SOCIETY, ROCKIES,NADA CULVER,DALY EDMUNDS,CRAIG GEHRKE,JOHN ROBISON	4. BLM has not demonstrated sufficient mitigation for impacts to greater sage-grouse habitat. While the Draft SEIS acknowledges the need for additional evaluation of impacts to greater sage-grouse habitat and mitigation for those impacts, the mitigation measures have not been finalized or, as a result, fully analyzed or proposed. Consequently, mitigation for impacts to sage-grouse habitat does not comply with the BLM's Idaho Sage-grouse Plan or applicable guidance. In September, 2015, BLM finalized plans addressing management of greater sage-grouse habitat, including on federal lands in Idaho. The Idaho Sage-grouse Plan addresses management of transmission lines, in general, and for the Gateway West Transmission Line, specifically, in both the Approved RMP Amendment and the Record of Decision for the Great Basin Region. The Approved RMP Amendment exempts the Gateway West Transmission Line from the management prescriptions that are generally applied to protect sage-grouse habitat from high voltage transmission, but commits to ensuring adequate conservation measures are incorporated, stating: PHMA (Idaho and Montana) and IHMA (Idaho), and GHMA (Montana only) are designated as avoidance areas for high voltage transmission line and large pipeline ROWs, except for Gateway West and Boardman to Hemingway Transmission Projects. All authorizations in these areas, other than the following identified projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in MD SSS 29 and MD SSS 30 of this document. The BLM is currently processing an application for Gateway West and Boardman to Hemingway Transmission Projects and the NEPA review for this project is well underway. Conservation measures for GRSG are being analyzed through the project's NEPA review process, which should achieve a net conservation benefit for the GRSG. Approved RMP Amendment, p. 2-32 (available at: https://eplanning.blm.gov/epl-front-office/projects/lup/31652/63338/68680/IDMT_ARMPA_web.pdf) (emphasis added). The Record of Decision for the Great Basin Region similarly acknowledges that transmission lines are to be avoided in greater sage-grouse habitat, and then commits to achieving a net conservation benefit to greater sage-grouse through the NEPA analysis for the Gateway West Transmission Line, stating: High voltage transmission lines will generally be avoided in PHMAs. A limited number of priority transmission lines, such as Transwest Express and portions that are collocated with Transwest Express, including Gateway South, Gateway West, and Boardman to Hemingway, have been proposed to expand access to renewable sources of energy and to improve the reliability of the western grid. These projects have been underway for several years and are currently being analyzed under NEPA. As part of the decision-making process for those projects, conservation measures for GRSG are being analyzed in the project-specific NEPA processes, which should achieve a net conservation benefit for GRSG. Record of Decision for the Great Basin Region, p. 1-21 (available at: https://eplanning.blm.gov/epl-front-office/projects/lup/31652/63290/68532/GB_ROD_9.21.15_-_web.pdf). While the Draft SEIS discusses efforts to achieve a net benefit for resources in the NCA, there is no acknowledgment that this standard applies specifically to greater sage-grouse or analysis of how the Proponents' Greater Sage-grouse Habitat Mitigation Plan would meet these standards. In addition, the Draft SEIS acknowledges that the Greater Sage-grouse Habitat Mitigation Plan does not fully compensate for potential indirect impacts to sage-grouse habitat. Draft SEIS, p. 3.11-34. BLM commits to "require that the Proponents develop a mitigation proposal that fully compensates for all potential indirect impacts to sage-grouse." Id. To calculate these impacts, the BLM references a white-paper developed with the U.S. Fish and Wildlife Service titled "Assessing Indirect Effects of Transmission Lines on Greater Sage-Grouse for the Gateway West Interstate Transmission Line Project." Id. We appreciate BLM's commitment to requiring mitigation for indirect impacts to sage-grouse. In addition, we generally support the approach taken in the white-paper to use buffer zones for calculating indirect impacts to ensure that avoidance, increased predation and decreased productivity and survival are all addressed. However, as discussed in detail above, requiring a mitigation proposal be developed and incorporated at some undefined later date is not acceptable. Rather, the BLM should ensure that a proposal is developed, made available for public comment and incorporated in any approval of the Gateway West Transmission Line. We understand that the agencies are continuing to develop and refine this methodology. However, analyzing indirect effects inherently requires estimation, since indirect effects are "caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." 40 C.F.R. 1508.8(b). Further, as discussed	The SEIS describes how current DOI policies and CEQ regulations on mitigation are being applied to the Gateway West project. Ensuring a net gain is discussed in Section 3.11.2.6 of the FSEIS. The compensatory mitigation plan for sage-grouse impacts from the 2013 FEIS will be carried through and applied to Segments 8 and 9 where appropriate, if those segments are authorized. The SEIS finds that the 2013 plan does not adequately address indirect effects to sage-grouse, qualitatively discloses the potential impacts, and discusses additional mitigation measures that will be required. The SEIS further requires that the Applicant develop compensatory mitigation to address these unaccounted indirect impacts, and recommends that the applicant use the white-paper methods to quantify their compensatory mitigation obligations for these unaccounted indirect effects. Mitigation for effects to sage-grouse must result in a net conservation gain. Although the conservation management standard for greater sage-grouse of "net conservation gain" in PHMA and IHMA from the 2015 land use plan amendments does not apply to the Gateway West Project, the BLM would seek to apply mitigation, including compensatory mitigation, to achieve an overall "net conservation gain" in connection with the Project. These mitigation measures would follow the process set forth in the Greater Sage-Grouse Habitat Mitigation Plan.

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			by CEQ, an EIS "must identify all the indirect effects that are known, and make a good faith effort to explain the effects that are not known but are 'reasonably foreseeable.'" CEQ clarifies that, while "the agency is not required to engage in speculation," …, in the ordinary course of business, people do make judgments based upon reasonably foreseeable occurrences." See, CEQ's NEPA's Forty Most Asked Questions (available at https://ceq.doe.gov/nepa/regs/40/40p3.htm). Where there is scientific uncertainty, NEPA imposes three mandatory obligations on BLM: (1) a duty to disclose the scientific uncertainty; (2) a duty to complete independent research and gather information if no adequate information exists unless the costs are exorbitant or the means of obtaining the information are not known; and (3) a duty to evaluate the potential, reasonably foreseeable impacts in the absence of relevant information, using a four-step process. Unless the costs are exorbitant or the means of obtaining the information are not known, the agency must gather the information in studies or research. 40 C.F.R. § 1502.22. Courts have upheld these requirements, stating that the detailed environmental analysis must "utiliz[e] public comment and the best available scientific information." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1171-72 (10th Cir. 1999) (citing Robertson v. Methow Valley Citizens' Council, 490 U.S. at 350); Holy Cross Wilderness Fund v. Madigan, 960 F.2d 1515, 1521-22 (10th Cir. 1992). Recommendations: BLM must address how mitigation measures that would address impacts to greater sage-grouse would result in a net conservation benefit, consistent with its commitments in the BLM's Idaho Sage-grouse Plan. In addition, BLM must finalize and incorporate an approach to assessing and compensating for indirect impacts to sage-grouse from the Gateway West Transmission Line. The public should be provided with an opportunity to review and comment on these mitigation measures, as well.	
101631	(i)	USDA NATURAL RESOURCES CONSERVATION SERVICE,CURTIS ELKE	All alternatives are expected to impact soils that are designated prime or of statewide importance. NRCS is available to assist federal agencies under the Farmland Protection Policy Act (Public Law 97-98, 7 U.S.C. 4201) (FPPA) to minimize the irreversible conversion of prime farmland to non-agricultural uses. Certain exceptions for minimal acres per linear mile may apply. NRCS recommends reviewing FPPA and, if necessary, completing the Federal Agency portion ofthe CPA-106 (enclosed) with a detailed map ofthe various route options. NRCS would then use the land evaluation and site assessment (LESA) system to establish farmland conservation impact rating scores for the route options under the seven alternatives. This score is used as an indicator for BLM to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level and should be analyzed in the Draft SEIS.	The EIS includes an analysis of prime farmland crossed by each route; see Section 3.18. Please note that the 250-foot-wide easement is not the same as the area disturbed by construction or affected during operation of the lines. Towers would be placed approximately 1,200 to 1,500 apart. Approximately 1 to 1.4 acres of land would be disturbed for each tower during construction. A much smaller area (approximately 0.2 acre per tower) would be lost to production during operations, see the independent analysis in Appendix K to the 2013 FEIS completed by an agricultural specialist working with the farmers of Power County and Cassia County Taskforce. Most of the area between the towers would not be disturbed, generally, only a temporary access road would be needed across farmland. The temporary road would be restored following construction.
101631	(ii)	USDA NATURAL RESOURCES CONSERVATION SERVICE,CURTIS ELKE	All alternative are expected to impact conservation practices previously installed by private landowners with or without cost share assistance from NRCS. The Proponents should consult with landowners to determine how implementation for segments 8 and 9 would affect these practices and determine if cost recovery is applicable for the landowner.	Comment noted. The FEIS and this SEIS recommend that the Proponents work with the landowners to limit impacts to farmland and farm operations. Also see AGRI-1: Consult with the Farm Service Agency and landowners to determine how construction may affect the CRP status of the land currently enrolled in CRP.
101631	(iii)	USDA NATURAL RESOURCES CONSERVATION SERVICE,CURTIS ELKE	Alternatives 2, 4, and 6 will impact private lands currently enrolled in a USDA Conservation Easement Program as perpetual easements under the Agricultural Lands Easements (ALE) as Wetland Reserve Easements. NRCS has no statutory authority to allow a modification to our easement, such as transmission line right-of-way. The purpose of these wetland easements are to protect, restore, and enhance wetlands. Permitted activities on the easement must benefit wildlife value. Transmission lines on or across the easement could result in collisions and deaths of birds using the easements. These impacts should be identified in the Draft SEISin Section 3.18.1.4 and analyzed throughout the document. Segments 8 and 9 Revised Proposed Route will not impact these private lands enrolled in ALE.	This is disclosed in Section 3.18 of the FEIS and of SEIS. Please note that any impacts would occur on private lands; the BLM has no authority to require actions on non-federal lands. The BLM included the following recommendation: AGRI-1 – Consult with the Farm Service Agency and landowners to determine how construction may affect the CRP status of the land currently enrolled in CRP.

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101632	(i)	WILDEARTH GUARDIANS,ERIK MOLVAR	BLM should analyze and adopt an alternative that entails the construction of a single line, right-sized to carry the electricity for both Section 8 and Section 9, in order to cut environmental impacts roughly in half, and should furthermore select the Section 8 routing to minimize the impacts of that larger line to sage grouse and birds of prey.	The Proponents' objective includes separate lines in order to provide a reliable grid. See Chapter 1.
101632	(ii)	WILDEARTH GUARDIANS,ERIK MOLVAR	We remain concerned that large, AC transmission lines like this one that cross important sage grouse habitats will spur the construction of wind power facilities in these habitats. At present, the development of new wind power facilities is prevented by an absence of available transmission capacity to take the electricity produced to market. The construction of Gateway West will let this djinni out of the bottle, and foster the construction of new wind farms. The Gateway West SDEIS should have examined this indirect impact of the transmission line, and the cumulative impacts of the transmission line together with the reasonably foreseeable increase in wind farm construction, on sage grouse and their habitats. By failing to undertake such an analysis, the SDEIS (and the Gateway West FEIS to which it is tiered) violate NEPA's cumulative impacts requirements.	The cumulative effects of the project on wind development and sage-grouse habitats is found in Section 4.
101632	(iii)	WILDEARTH GUARDIANS,ERIK MOLVAR	The SDEIS fails to address unresolved problems with the routing of the Gateway West project through southwest Wyoming; the approved route crosses through sage grouse Priority Habitats ("PH MAs") northwest of Kemmerer. The SDEIS should also include re-routing the southwest Wyoming sections ofthe line to follow Interstate 80 instead of cutting the corner northwest through prime sage grouse habitats, in order to minimize impacts to this BLM Sensitive Species.	The BLM made their final decision on the portion of the route through Wyoming in the 2013 Gateway West ROD. As disclosed in Chapter 1, this SEIS is only applicable to segments 8 and 9.
101632	(iv)	WILDEARTH GUARDIANS,ERIK MOLVAR	The Purpose and Need Cannot be Arbitrarily Restricted to Construction of Two Distinct Lines The Purpose and Need for this project appears to have been arbitrarily constricted around the proponent's proposal to build two separate transmission lines through the SDEIS project area for the purpose of creating redundancy. As BLM itself notes, adding even one additional transmission line increases redundancy: Adding new transmission facilities to a network provides not only new transmission capacity but also levels of backup to each other during outage conditions when elements of the system are taken out of service during both planned and unplanned events. SDEIS at 1-18. Each alternative includes one line segment from 8 and one from 9. SDEIS at 1-7, 1-21. Any redundancy from building two parallel segments, however, is illusory. If the BLM approves both segments 8 and 9, each carrying 500 kV of electricity (SDEIS at 1-21), then the proponents will attempt to fully subscribe both lines to carry the full 500 kV as often as possible. If the north line is already full, it has no available capacity to carry electricity from the south line if the south line goes down. Therefore the redundancy sought by the project proponent does not exist. Having two lines instead of one merely allows the proponent to deliver half the electricity of one line goes down. However, the Gateway West project is part of a much larger an more complex power grid. Electricity subscribed to the Gateway West line(s) might be accommodated on other, unrelated lines to route the power around a line outage in any case, using the web of redundancy already in place. To a certain extent, many of these grid lines may also be fully subscribed, yet in the case of power outages referenced in the case where all three lines near the Jim Bridger went out simultaneously (SDEIS at 1-20), power went out and some customers were left without power. But such blackouts and brownouts are extremely temporary, because the grid already contains sufficient redundancy (before even adding Gateway West) to restore power, usually within a matter of hours, to customers who have no power as a result of multiple line outages. For this reason, it is eminently reasonable for BLM to analyze in depth an alternative that would authorize a single Gateway West line alignment, right-sized to accommodate all the power carried by the line. Just because the proponents did not propose this as an option, does not limit the BLM's ability (and indeed, legal obligation) to consider other alternatives that achieve the same objective of transporting the same electrical power, with radically lower environmental impacts. Indeed, NEPA demands that BLM fully examine alternatives with lower environmental impacts. Failure to do so exposes the agency to litigation over a failure to examine other reasonable alternatives. An examination of the Purpose and Need section of the SDEIS does not reveal any information indicating that such a single-line alternative cannot be accommodated in the SDEIS.	The BLM's Purpose and Need are described in Chapter 1, The BLM has received ROW applications from the Proponents and must determine whether to authorize the use of the National System of Public Lands for portions of Gateway West. The application includes two separate lines for reliability purposes. Therefore, the BLM is analyzing alternatives that include separate lines.

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101632	(v)	WILDEARTH GUARDIANS,ERIK MOLVAR	The science is clear that large transmission lines like Gateway West have potential to result in major impacts to the habitat and populations of the greater sage grouse, a BLM Sensitive Species that still teeters on the brink of Endangered Species Act listing. Knick et al. (20 11: 1) evaluated the threats facing the greater sage grouse in the Wyoming Basins Ecoregion, and stated, "Oil, gas, and wind energy development as well as the necessary infrastructure for energy transmission are dominant land uses that can fragment landscapes and influence resource availability" (internal citations omitted). Nonne et al. (2011) found that raven abundance increased along the Falcon-Gondor powerline corridor in Nevada both during the construction period, and long-term after powerline construction activities had ceased. These increases were documented to be long-term increases by a subsequent report on the same powerline (Gibson et al. 2013). Dinkins et al. (2012) found that sage grouse selected habitats with lower densities of avian predators during nesting and brood-rearing seasons. Thus, because transmission lines increase densities of avian predators, sage grouse should avoid habitats surrounding these structures. Dinkins (2013) documented sage grouse avoidance ofpowerlines not just during the nesting period but also during early and late brood-rearing. Wisdom et al. (2011) found that lands within 3.1 miles of transmission lines and highways had an elevated rate of lek abandonment. LeBeau (20 12) documented that sage grouse avoid otherwise suitable habitats within 2.9 miles on either side of transmission lines. Braun et al. (2002) reported that 40 leks with a power line within 0.25 mile of the lek site had significantly slower population growth rates than unaffected leks, which was attributed to increased rap tor predation. Gibson et al. (20 13: 27) reported significantly lower nest success and female survival near the Falcon-Gondor powerline, an impact that was greatest closest to the powerline but was still measurable out to 20 km (12.4 miles) away from the powerline. These researchers concluded, "Published results suggest that population growth in sage-grouse is highly sensitive to variation in female survival and nest survival (Taylor et al. 2011); therefore we urge caution when placing transmission lines within sage-grouse habitat. Additionally, placement of the Falcon-Gondor transmission line was selected specifically to minimize the disturbance to sage-grouse (M. Podborny, NDOW, personal communication), therefore our results may underestimate the influence of transmission lines in general on sage-grouse demographic rates, depending on line placement." The BLM's Greater Sage-grouse National Technical Team (2011) also recommended that Priority Habitats be managed as exclusion areas for new overhead transmission lines. The USFWS Conservation Objectives Team (2013) recommended avoiding the construction of transmission lines in sage grouse habitat (Priority Habitats or otherwise) and that powerlines should be buried where avoidance is not possible. Transmission lines can alter dispersal patterns of sage grouse (Ellis 1985), and Shirk et al. (20 15) found that multiple transmission lines have been documented to create a migration and dispersal barrier for sage grouse. Other transmission lines already exist along the Gateway West route, and the new transmission line will have cumulative effects of preventing or reducing natural migration and dispersal across the transmission corridor, particularly where interstate highways, which are avoided in their own right, occur nearby. The issue of cumulative impacts of multiple transmission lines (and highways) serving as migration and dispersal barriers for sage grouse is an important environmental impact for the agency to consider. Yet BLM appears not to have considered the synergistic impacts of multiple, co-located transmission lines in fragmenting and isolating sage grouse populations. While co-locating transmission lines reduces impacts in some cases, where the co-located lines bisect important or sensitive habitats, the impacts are multiplied. These transmission lines need to be sited in the least environmentally harmful alignment, which is not currently proposed. This violates NEPA's requirement to take a hard look at direct and cumulative impacts. The Wyoming Greater Sage-Grouse Resource Management Plan Amendment and the IdahoSouthwest Montana Sage-grouse RMP amendment both designated sage grouse Priority Habitats and Important Habitats as 'avoidance' areas for transmission line siting. The transmission line alignment proposed for approval in the Gateway West SDEIS does not appear to comply with this direction. However, the Gateway West transmission project is one of several transmission lines explicitly exempted from these habitat protections. We contest whether these sage grouse RMP amendments, which are concurrently under litigation, provide legally adequate sage grouse protections through the implementation of this project. The fact that this transmission line is excluded from the sage grouse protections in the RMP amendments means that the NEPA analysis in the RMP amendment EISs fails to cover the impacts from these lines, heightening the need for a thorough 'hard look' at direct and cumulative impacts of this transmission line, and others exempted from the RMP amendments. This hard look is not provided in the SDEIS (or the original FEIS).	The Project includes alternatives that avoid general sage-grouse habitats as well as agency designated sage-grouse habitats. The SEIS also discloses the impacts that would occur to sage-grouse and their habitats along each alternative, including the agency designated habitats listed in this comment.

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			Perch inhibitors do little to solve the problems of added mortality for increased raptor predation or behavioral avoidance of transmission lines by sage grouse, because they do not prevent raptor perching and because they do nothing to mitigate the avoidance of tall structures by sage grouse. Raptorsperching have an increased impact on nesting birds at least 0.25 mile from the structure (Braun et al. 2002, Hanser et al. 2011, Dinkins 20 13). Anti-perching devices have limited effectiveness on small lines (Prather 2010) or on major transmission lines like Gateway West (Lammers and Collopy 2007) and therefore are no substitute for an outright prohibition on tall structures in key grouse habitats. Coates etal. (20 13) recommended a 4.66-mile buffer for active leks as the appropriate area of protection for sage grouse key habitats (at least breeding, nesting, and early brood-rearing habitats); Peck etal. (20 12) recommended a 10-km buffer for nesting habitat in Utah. Reliance on perch inhibitors therefore does little to mitigate the impacts of transmission lines on sage grouse. The distance that impacts extend laterally from this transmission line is an important factor in analyzing the magnitude of impacts under the various alternatives. In other NEPA analyses, BLM assumes a 4.25-mile avian predator foraging distance from powerlines which seems a reasonable assumption. Idaho - Southwest Montana Great Sage Grouse RMP Amendment Draft EIS at 4-8. Manier etal. (2014) found that the cumulative density of transmission lines within 4 miles of leks was correlated with impacts on sage grouse populations. The proposed transmission lines would employ a 0.6-mile NSO buffer for siting, in accordance with IM 2012-43 (SDEIS at 4-43), which is woefully insufficient to prevent major impacts to sage grouse and is not in accord with the best available science (see, e.g., Manier etal. 2014, as well as the entire preceding section of comments). And in many cases, the centerline of the transmission line will be less than 0.25 mile from an active lek (SDEIS at 4-43). This is unacceptable and represents unnecessary and undue degradation of sage grouse habitats. Sesaonal restrictions on construction activities (SDEIS at 4-44) mean very little over the long term, as the mere existence of the transmission line as a tall structure that serves to concentrate roosting birds of prey will render the sage grouse habitats for at least 4 miles on either side unavailable to sage grouse, due to behavioral abandonment of otherwise suitable habitats. The BLM's National Technical Team was called together to evaluate the best available science and make recommendations for sage grouse conservation measures to be implemented through the planning process. Its charter is explained as follows: “To ensure BLM management actions are effective and based on the best available science, the National Policy Team created a National Technical Team (NTT) in August of201I. The BLM's objective for chartering this planning strategy effort was to develop new or revised regulatory mechanisms, through Resource Management Plans (RMPs), to conserve and restore the greater sage-grouse and its habitat on BLM-administered lands on a range-wide basis over the long term. The National Greater Sage-Grouse Planning Strategy Charter charged the NTT to serve as a scientific and technical forum to: · Understand current scientific knowledge related to the greater sage-grouse. · Provide specialized sources of expertise not otherwise available. · Provide innovative scientific perspectives concerning management approaches for the greater sage-grouse. · Provide assurance that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented. · Provide science and technical assistance to the Regional Management Team (RMT) and Regional Interdisciplinary Team (RIOT), on request. · Articulate conservation objectives for the greater sage-grouse in measurable terms to guide overall planning. · Identify science-based management considerations for the greater sage-grouse (e.g., conservation measures) that are necessary to promote sustainable sage-grouse populations, and which focus on the threats (75 FR 1391 0) in each of the management zones. The National Technical Team (NTT) met from August 28 through September 2, 2011, in Denver, Colorado, and a subset of the team met December 5-8 in Phoenix, Arizona, to further articulate the scientific basis for the conservation measures. Members of the team included resource specialists and scientists from · the BLM, State Fish and Wildlife Agencies, USFWS, Natural Resources Conservation Service (NRCS) and U.S. Geological Survey (USGS).” National Technical Team (2011: 4). According to the National Technical Team (2011: I2), "Existing and	

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			proposed developments for ROWs (such as powerlines, pipelines, and renewable energy projects) and access to various mineral claims or energy development locations have the potential to cause habitat loss and fragmentation that decreases habitat and population connectivity." For transmission lines, these experts recommended, "Make priority sage-grouse habitat areas exclusion areas for new ROWs permits" (NTT 2011: I2). The Gateway West proposed alternatives do not follow these recommendations.	
101632	(vi)	WILDEARTH GUARDIANS,ERIK MOLVAR	According to Manier et al. (2013), a variety of threats, such as urbanization, intensive energy development and extensive infrastructure, including power lines, fences, and roads, which contribute to disturbance, increased predation, and habitat fragmentation and degradation, and livestock grazing also threaten sage grouse. The SDEIS includes a mere list of reasonably foreseeable future actions in its cumulative impacts analysis, but fails utterly to disclose the magnitude of each impact or the potential for amplified cumulative impacts from the synergistic negative effects of multiple stressors. The Objectives of BLM's sensitive species policy includes the following: "To initiate proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of these species under the ESA." BLM Manual 6840.02. Under this policy, District Managers and Field Managers are tasked with "Ensuring that land use and implementation plans fully address appropriate conservation of BLM special status species." BLM Manual 6840.04(£)(6). This is defined as follows: "as applied to Bureau sensitive species, the use of programs, plans, and management practices to reduce or eliminate threats affecting the status of the species, or improve the condition of the species' habitat on ELM-administered lands." BLM Manual 6840, Glossary 2. Importantly, “When appropriate, land use plans shall be sufficiently detailed to identify and resolve significant land use conflicts with Bureau sensitive species without deferring conflict resolution to implementation-level planning. Implementation level planning should consider all site-specific methods and procedures needed to bring species and their habitats to the condition under which management under the Bureau sensitive species policies would no longer be necessary.” BLM Handbook 6840.2(8). Under this policy, "Bureau sensitive species will be managed consistent with species and habitat management objectives in land use and implementation plans to promote their conservation and to minimize the likelihood and need for listing under the ESA." BLM Manual 6840.06, emphasis added. In implementing this policy, "the BLM shall manage Bureau sensitive species and their habitats to minimize or eliminate threats affecting the status of the species or to improve the condition of the species habitat." BLM Manual 6840.2(C). The BLM is responsible for "Ensuring that BLM activities affecting Bureau sensitive species are carried out in a way that is consistent with its objectives for managing those species and their habitats at the appropriate spatial scale." BLM Manual6840.2(C)(2). The BLM itself has been forced to admit that "New information from monitoring and studies indicate that current RMP decisions/actions may move the species toward listing ... conflicts with current BLM decision to implement BLM's sensitive species policy" and "New information and science indicate 1985 RMP Decisions, as amended, may not be adequate for sage grouse."1 Continued application of conservation measures known to be ineffective in the face of strong evidence that they do not work, and continuing to drive the sage grouse toward ESA listing in violation of BLM Sensitive Species policy, is arbitrary and capricious and an abuse of discretion under the Administrative Procedures Act. The agency, through the Gateway West process, needs to provide management that will prevent this decline of sage grouse across the planning area, and in Idaho in particular.	The very detailed analysis of sage-grouse habitat and the effects of the Project on this habitat do not indicate a risk of the Project causing the listing of sage-grouse. The USFWS's BO agrees with that conclusion. See the HEA in Appendix J of the 2013 FEIS. The BLM is working with the USFWS and the State to develop additional mitigation sage-grouse.
101632	(vii)	WILDEARTH GUARDIANS,ERIK MOLVAR	In 2004, BLM published its National Sage-Grouse Habitat Conservation Strategy ("Strategy").2 According to this policy, "The Federal Land Policy and Management Act (1976) (FLPMA) provides the basic authority for BLM's multiple use management of all resources on the public lands. One of the BLM's many responsibilities under FLPMA is to manage public lands for the benefit of wildlife species and the ecosystems upon which they depend .... Consistency and coordination in identifying and addressing threats to sage-grouse and sagebrush habitat in context of the multitude of programs that BLM manages is required. Addressing these threats throughout the range of the sage-grouse is critical to achieving the mandate of FLPMA and threat reduction, mitigation, and elimination to sage-grouse and sagebrush habitats." Strategy at 4. Among other commitments, this policy binds the BLM to "use the best available science and other relevant information to develop conservation efforts for sage-grouse and sagebrush habitats." Strategy at 7. The BLM has failed to examine the best available science, including several of the	The analysis for sage-grouse was developed in cooperation with the USFWS and State agencies, using a science-based HEA. See the HEA in Appendix J in the 2013 FEIS. The BLM is working with the USFWS to develop additional mitigation sage-grouse.

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			scientific articles referenced in the Literature Cited section of these comments, review them thoroughly and incorporate their findings into the EIS, and use them to inform the environmental impacts analysis for this project. This sage grouse policy required BLM to complete an Ecoregional Assessment for the Wyoming Basins Ecoregion. Id. at 11. This Wyoming Basins Ecoregional Assessment publication ("WBEA")3 was completed in 2011, and the Northern Great Basin and Range and Snake River Plains Ecoregional Assessment was completed in 2009, and BLM should reference the full findings of these reports as they apply to the Gateway West project, which falls partially within the Wyoming Basins Ecoregion and partly within the Northern Basin and Range and Snake River Plains Ecoregion, in order for the BLM to have met its obligation to "use the best available science" including publications specifically mandated under the Strategy. 1 Sage grouse plan amendment land user information meeting PowerPoint, available online at http://www.blm.gov/pgdata/etc/medialib/blm/wy/informationfNEPA/bfodocs/sagegrouse.Par.94571.File.dat/May28_InfoMtg.pdf. Site last visited 7/16/2008. 2 Available online at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/fish_wildlife_and.Par.9151.File.dat/Sage-Grouse_Strategy.pdf; site last visited 3/13/13. 3 Available online at http://sagemap.wr.usgs.gov/Docs/WBEA/wbea_book _5mb.pdf; site last visited 1/24/14. The WBEA study included a complete land cover mapping exercise including analysis of human footprint, which would have been useful to include in the Affected Environment section of the SDEIS. This document states, “Citizens should insist that they make use of the information contained in this volume to better protect critical core areas and connectivity zones (wildlife corridors) throughout the region, while practicing truly sustainable stewardship of the multiple-use landscape matrix. We can hope that energy development, roads, transmission corridors, and other potentially damaging land uses will be shifted to degraded sites and avoid further fragmentation and alteration of areas with high conservation value.” WBEA at xiv. In comments on the Gateway West DEIS and FEIS, conservation groups insisted that the transmission line avoid important habitats to the greatest extent possible, but thus far this insistence has fallen on deaf ears. The WBEA analysis also found that sage grouse density was negatively correlated with major highways, powerlines, and the presence of oil and gas wells. WBEA at 124. These researchers concluded “This spatially explicit knowledge of existing sage-grouse distribution can help inform and prioritize areas for application of future conservation and management actions in the region (Aldridge et al. 2008, Meinke et al. 2009) and thus maximize the effectiveness of limited but precious conservation resources.” WBEA at 135. The National Sage-grouse Habitat Conservation Strategy was followed in 2011 by the same agency's National Greater Sage-grouse Planning Strategy ("Planning Strategy"). This strategy recognizes that inadequacy of regulatory mechanisms (including BLM's regulatory mechanisms) contributed to the USFWS finding that the greater sage grouse warranted ESA listing, and that Resource Management Plans were the BLM's principal regulatory mechanism. According to this policy, “Based on the identified threats to the greater sage-grouse and the USFWS's timeline for making a listing decision on this species, the BLM needs to incorporate explicit objectives and adequate conservation measures into RMPs within the next three years in order to conserve greater sage-grouse and avoid a potential listing under the Endangered Species Act.” Planning Strategy at 1. The crux of these comments is the need for BLM to adopt adequate conservation measures under the Idaho- Southwest Montana RMP Amendment. According to BLM IM 2012-44, "The conservation measures developed by the NTT and contained in Attachment 3 must be considered and analyzed, as appropriate, through the land use planning process by all BLM State and Field Offices that contain occupied Greater Sage-Grouse habitat." This has not been fully accomplished in the context of the Gateway West project. IM 20 12-44 does not provide an option not to analyze these measures in at least one alternative unless a clear finding is provided that the measure is not appropriate, and BLM has provided no such findings in the context of the RMP amendments.	

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			The NTT Report recommends that all electrical distribution lines be buried within Priority Habitats, period; BLM does not evaluate this under any alternative. BLM itself has pointed out increases in predator concentration within 4.25 miles of power lines. Idaho- Southwest Montana Greater Sage Grouse RMP Amendment DEIS at 4-8. Power lines may also cause changes in lek dynamics, with lower growth rates observed on leks within 0.25 miles of new power lines in the Powder River Basin of Wyoming as compared with those further from the lines, a difference attributed to increased raptor predation (Braun et al. 2002). The National Technical Team fully considered the impacts of overhead powerlines, and also considered the impacts of noxious weeds, and both are discussed in detail in the NTT Report. After weighing carefully the relative harms from each threat, the NTT unambiguously recommended that electrical distribution lines be buried in all cases. Portions of this project in Wyoming are part of the Wyoming Basins Ecoregion; Idaho portions are in the Northern Great Basin and Range and Snake River Plain Ecoregion. At a minimum, this EIS should have incorporated the science of the Northern Great Basin and Range and Snake River Plan Rapid Ecoregional Assessment and the Wyoming Basins Ecoregional Analysis, and share common minimum standards to protect sage grouse with plans in Idaho and Wyoming that also govern lands in the Ecoregion.	
101632	(viii)	WILDEARTH GUARDIANS,ERIK MOLVAR	The Department of the Interior's Mitigation Policy (SO 3330) directs agencies to adopt a hierarchical approach to mitigation, consisting of avoidance of impacts, then minimization of impacts, then compensation of impacts. This policy is noted as a priority for implementation through the BLM land-use planning process. 81 Fed. Reg. 9679. However, recent mitigation actions reveal an institutional bias on the part of the BLM to skip past the "avoidance" part of this direction, give short shrift to the "minimize" direction, and instead make a beeline for the "compensation" aspect, allowing environmentally irresponsible land uses to proceed in exchange for a monetary payment or a commitment to engage in projects whose effectiveness is typically measured in terms of acres treated rather than actual improvement for the resource that was damaged or sacrificed in the first place. This appears to have occurred in the context of the Gateway West EIS. The 2015 Presidential Memorandum titled 'Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment provides further guidance that has not been followed in this transmission line project. This Memorandum underscores the "avoid, the minimize, then compensate" hierarchy formalized in SO 3330. This Memorandum also calls for planning to include "the identification of areas where development may be most appropriate, where high natural resource values result in the best locations for protection and restoration, or where natural resource values are irreplaceable." BLM claims that it has followed the avoid/minimize/compensate protocol in these policies by considering them "among the considerations for the Gateway West Project." SDEIS at 1-28. Avoidance is achievable by selecting different (though longer transmission line routings; these were not considered. Major transmission lines like Gateway West should be excluded from the occupied range of sage grouse entirely. Perhaps most importantly, the Presidential directive calls for agencies to apply a policy of "no net loss" for resources that are important, scarce, or sensitive. The mitigation measures outlined in Appendix K of the FEIS fail to demonstrate that they will prevent a net loss of either sage grouse habitat effectiveness or bird population numbers. Indeed, the development of a Mitigation Plan has not yet been undertaken, but instead will be deferred to the SFEIS (SDEIS at 3-3), and so the mitigation measures remain speculative. No mitigation measures yet exist. So, the BLM fully discloses that all of the action alternatives will result in substantial impacts to sage grouse populations and habitat use, and significant degradation to sage grouse habitat function, and provides no compensatory measures to increase habitat function, sage grouse population numbers, or landscape permeability to compensate for project-related impacts to these critically important attributes that allow sage grouse to persist on the landscape. This is unacceptable, and violates both Secretarial Order 3330 and also the aforementioned Presidential Memorandum.	Please see Appendix K of this document. It summarized the avoidance, minimization, and restoration strategy as well as the framework for determining compensatory mitigation and enhancement that may be needed.
101632	(ix)	WILDEARTH GUARDIANS,ERIK MOLVAR	Instruction Memorandum (IM) 97-118 governs BLM Special Status Species management and requires that actions authorized, funded, or carried out by the BLM do not contribute to the need for any species to become listed as a candidate, or for any candidate species to become listed as threatened or endangered. This IM recognizes that early identification of BLM sensitive species is advised in efforts to prevent	The analysis does not indicate a risk of the Project causing the listing of sage-grouse or any other species. Also refer to the USFWS's BO prepared for the Project.

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			species endangerment, and encourages state directors to collect information on species of concern to determine if BLM sensitive species designation and special management are needed. In addition, for special status species, including Sensitive Species, BLM must: “Identify strategies and decisions to conserve and recover special status species. ·· Given the legal mandate to conserve threatened or endangered species and BLM's policy to conserve all Special Status Species, land use planning strategies and decisions should result in a reasonable conservation strategy for these species. Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. This may include identifying stipulations or criteria that would be applied to implementation actions.” BLM Land Use Planning Handbook H-1601-1, Appendix Cat 5. Additionally, if Sensitive Species are designated by a State Director, the protection provided by the policy for candidate species shall be used as the minimum level of protection. BLM Manual 6840.06. The policy for candidate species states that the "BLM shall carry out management, consistent with the principles of multiple use, for the conservation of candidate species and their habitats and shall ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these species as threatened/endangered." BLM Manual 6840.06. In the context of the land use planning process, each State Director is responsible for "[e]nsuring that when BLM engages in the planning process, land use plans and subsequent implementation level plans identify appropriate outcomes, strategies, restoration opportunities, use restrictions, and management actions necessary to conserve and/or recover listed species, as well as provisions for the conservation of Bureau sensitive species." BLM Manual 6840.04(D)(5). Under BLM Sensitive Species policy, the agency is charged with "Ensuring that BLM actions are not likely to jeopardize the continued existence of any endangered species or threatened species or destroy or adversely modify designated critical habitat." BLM Manual 6840.1(E)(3). BLM must further "Developing and implementing agency land use plans, implementation plans, and actions in a manner consistent with conservation and/or recovery of listed species." BLM Manual 6840.1 (E)(5). The greater sage grouse is listed as a BLM Sensitive Species. BLM has the following responsibility with regard to sage grouse: "As a federal agency, the BLM is obligated to develop and implement a strategy to avoid having its management activities contribute to the need to list greater sage grouse under the ESA." Lander RMP FEIS at 1282. According to BLM, “Adverse impacts to special status species and their habitats are usually of more concern than impacts to general wildlife because of the limited nature of their numbers, habitat, or unique threats. Special status wildlife species mortality, habitat loss, fragmentation, or modification, and/or population declines can contribute to BLM sensitive species becoming listed under the ESA, and ESA listed species becoming more imperiled.” Lander RMP FEIS at 925. The approval of the Gateway West transmission line in its proposed routing is likely to contribute to the need to list the greater sage grouse under the ESA. According to BLM policy, "It is in the interest of the BLM to undertake conservation actions for such species before listing is warranted." BLM Manual 6840.2. There could no more obvious example of this than the sage grouse, which may yet be listed under the ESA, and which BLM has been seeking to prepare conservation measures in its RMPs range-wide that are adequate to avoid the need to list the species. The sage grouse will be reconsidered for Endangered or Threatened Species listing in 2020. Importantly, the USFWS sage grouse "not warranted" findings have been litigated and overturned in the past by the court system, and there is every possibility that the 2015 "not warranted" may also be overturned. It is in the BLM's strong interest to build a record that it is implementing the strongest conservation measures feasible within Priority Habitats and Important Habitats. Failure to do so builds a record that BLM is needlessly exposing the sage grouse to threats to its viability, even within Priority Habitats, and is continuing along the path of inadequate regulatory mechanisms, which would strengthen the likelihood that the bird will ultimately be listed. For Sensitive Species, "On BLM-administered lands, the BLM shall manage Bureau sensitive species and their habitats to minimize or eliminate threats affecting the status of the species or to improve the condition of the species habitat," by implementing a number of measures. BLM Manual 6840.2(C). These include: "Prioritizing Bureau sensitive species and their habitats for conservation action based on considerations such as human and financial resource availability, immediacy of threats, and relationship	

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			to other BLM priority programs and activities." BLM Manual 6840.2(C)(5). For BLM Sensitive Species, BLM Field Managers are charged with furthering the conservation and/or recovery of sensitive species (BLM Manual 6840.06), which is defined "as applied to Bureau sensitive species, the use of programs, plans, and management practices to reduce or eliminate threats affecting the status of the species, or improve the condition of the species' habitat on ELM-administered lands." BLM Manual 6840, Glossary. We are concerned that no action alternative will uphold BLM's obligation to manage Sensitive Species to "minimize or eliminate threats," either within or outside of PHMAs. Specifically, we are concerned that the Gateway West line as proposed, both individually and cumulatively with other existing powerlines will, through avoidance of sage grouse of these two sets of tall structures in relatively close proximity, create a barrier to sage grouse migration and dispersal that will essentially cut sage grouse populations in northwest Colorado in half, isolating those populations south of the line(s) and thereby radically increasing their likelihood of extirpation through stochastic events (weather or disease) and ultimately inbreeding depression. This result represents an unnecessary and undue degradation of key sage grouse habitats.	
101632	(x)	WILDEARTH GUARDIANS,ERIK MOLVAR	The Gateway West Project as Proposed Violates FLPMA Unnecessary or Undue Degradation Requirements By law, the BLM must "take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b). BLM's unnecessary or undue degradation ("UUD") responsibilities are intertwined with the agency's NEPA duties. Under NEPA, BLM must identify impacts a proposed action will have to the environment; married to this obligation are the duties imposed by FLPMA to identify the thresholds of acceptable impact and then determine whether the impacts are unnecessary or undue. If the impacts are determined to be necessary and unavoidable, BLM must then analyze whether the impacts are undue. NEPA then reasserts itself in the process by mandating that alternatives be considered to ensure that unnecessary or undue actions are not undertaken and to ensure that methodologies used to prevent UUD are supported and verified. Ecology Center, Inc. v. Austin, 430 F.3d 1057, 1065 (9th Cir. 2005). BLM admits that this project will result in degradation and loss of function for sage grouse habitat. FEIS at 3- 374. In the context of hard-rock mining, "[a] reasonable interpretation of the word 'unnecessary' is that which is not necessary for mining. 'Undue' is that which is excessive, improper, immoderate, or unwarranted." Utah v. Andrus, 486 F.Supp.995, 1005 n.13 (Dist. Utah 1979). FLPMA requires that, “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; ... that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use;” 43 U.S.C. § 1701(a)(8). At the same time, FLPMA directs that these uses be balanced with mineral extraction by requiring that, “the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals ... from the public lands including implementation of the Mining and Minerals Policy Act of 1970 ...” 43 U.S.C. § 1701(a)(12). The key here is for BLM to balance these opposing needs. Given the imminence of Endangered Species Act listing for the greater sage grouse, further destruction of habitat and potential isolation of populations would violate this standard. According to the original mining regulations, "Unnecessary or undue degradation means impacts greater than those that would normally be expected from an activity being accomplished in compliance with current standards and regulations and based on sound practices, including use of the best reasonably available technology." 43 C.F.R. § 3802.0-5(1) (emphasis added). In the Gateway West SDEIS, BLM has failed to apply in its preferred Alternatives the recommended sage grouse protections presented to it by its own experts (the BLM National Technical Team), and as a result development approved under several of the alternatives analyzed will result in undue degradation of sage grouse Priority Habitats and result in sage grouse population declines in these areas, undermining the effectiveness of the sage grouse plan amendments as an adequate regulatory mechanism in the context of the decision.	The proposed Project does not violate FLPMA's unnecessary or undue degradation requirements. Unnecessary or undue degradation under FLPMA refers to actions beyond those necessary to build the project. Design features, mitigation (avoidance, minimization, and restoration) and enhancement measures included in the project are designed to avoid unnecessary or undue degradation.

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101632	(xi)	WILDEARTH GUARDIANS,ERIK MOLVAR	In light of BLM policy requirements to prevent activities that contribute to the need to list BLM Sensitive Species under the Endangered Species Act, and the potentially major impact of the Gateway West transmission line as proposed for approval by BLM contributing to direct and indirect impacts on sage grouse Important Habitats and Priority Habitats (and thereby causing reduced nest success and displacement of sage grouse from significant parts of these habitats, as well as the direct and cumulative fragmentation and loss of connectivity within and between these priority habitats), the impact of this transmission line as proposed for permitting by BLM is clearly undue.	See the response to your similar comments that the project would lead to species being listed above.
101632	(xii)	WILDEARTH GUARDIANS,ERIK MOLVAR	The range of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. See 40 C.F.R. §§ 1502.14(a) and 1508.25(c). Formulation of alternatives during the NEPA disclosure and study process is at the heart of Congress' choice ofNEPA as the procedural method that guides federal agencies' management of the public lands. See Natural Resources Defense Council v. Hodel, 865 F.2d 288, 299 (D.C. Cir. 1988) (citing Kleppe v. Sierra Club, 427 U.S. 390, 410 (1976)). In fact, NEPA requirements state that "no action concerning the proposal should be taken which would: (1) Have an adverse environmental impact; or (2) Limit the choice of reasonable alternatives." 40 C.F.R. § 1506.1 (a). Catron County v. U.S Fish and Wildlife Sen}ice, 75 F.2d 1429 (l0th Cir. 1996)(partial NEPA compliance is not enough.) NEPA regulations also require agencies to address appropriate alternatives in Environmental Assessments. 40 C.F.R. § 1508.9, with specific reference to section 102(2)E of NEPA. In addition, the law requires consideration of a range of mitigation measures. See Kootenai Tribe of Idaho v. Veneman, 313 F .3d 1094,1122-1123 (9th Cir. 2002) (and cases cited therein) (stating that agencies must develop and analyze environmentally protective alternatives in order to comply with NEPA). Section 102(2)(C) of NEPA requires an agency to present alternatives to the proposed action, and Section 102(2)(E) requires the agency to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U .S.C. § 4332(2)(C) and (E) (1994); see 40 C.F.R. § 1501.2(c); Biodiversity Associates, IBLA 2001-166 at 6; Wyoming Outdoor Council, 151 IBLA 260,272 (1999); Howard B. Keck, Jrl., 124IBLA 44, 53 (1982); Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1228-29 (9th Cir. 1988), cert. Denied, 489 U.S. 1066 (1989). The fact that this basic, fundamental requirement that is the touchstone of eve1y NEPA document has not gone unnoticed on the federal judiciary in sending back environmental studies that fail to meet this requirement, is noteworthy. See e.g., Calvert Cliffs Coordinating Comm., Inc. v. United States Atomic Energy Comm'n, 449 F.2d 1109, 1114 (D.C. Cir. 1971) (detailed EIS required to ensure that each agency decision maker has before him and takes into account all possible approaches to a particular project ... which would alter the environmental impact and the cost benefit balance); Natural Resource Defense Council v. Callaway, 524 F.2d 79, 93 (2nd Cir. 1975); ("The duty to consider reasonable alternatives is independent from and of wider scope than the duty to file an environmental statement."); Simmons v. United States Army Corps of Engineers, 120 F.3d 664,660 (7th Cir. 1997) ("The highly restricted range of alternatives evaluated and considered violates the very purpose of NEPA's alternative analysis requirement: to foster informed decision making and full public involvement."); Alaska Wilderness Recreation & Tourism v. Morrison, 67 F.3d 723, 729 (9th Cir. 1995) ("The existence of a viable but unexamined alternative renders an environmental impact statement inadequate."); Dubois v. US. Dept. of Agric., 102 F.3d 1273, 1288 (1st Cir. 1996) (EIS invalid because agency did not consider alternative of using artificial water storage units instead of a natural pond as a source of snowmaking for a ski resort); Libby Rod & Gun Club v. Poteat, 457 F. Supp. 1177, 1187-88 (D. Mont. 1978), rev'd in part on other grounds, 594 F.2d 742 (9th Cir. 1979) (Army Corps of Engineers violated NEPA in an EIS for a hydroelectric dam by only cursorily addressing the alternatives of meeting the Northwest's energy needs through other sources or conservation.); Northwest Envt 'l Defense Center v. Bonneville Power Admin., 117 F .3d 1520, 153 8 (9th Cir. 1997) ("An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action.") The failure to look at the full range of reasonable alternatives is related to BLM's duty in any environmental analysis to develop, study, analyze and adopt mitigation measures to protect other resources. The BLM failed to consider an alternative to require only a single transmission line along route 8H.	The BLM has been studying the proposal to build the Gateway West transmission lines since it received the proponents' first application in 2007. Over 50 routes have been considered for segments 8 and 9 (see the discussion in Chapter 2 of the SEIS) in an attempt to find alternatives that meet the project objectives in the least impactful way. The BLM believes that it has analyzed a reasonable range of alternatives and that the FEIS and this SEIS provide an exceptionally detailed and comprehensive analysis.

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			The Tenth Circuit examined NEPA's alternatives requirement and agreed with other courts that "have interpreted NEPA to preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished be only one alternative (i.e. the applicant's proposed project)." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1165 (10th Cir. 1999), at 1174 (citing Simmons v. United States Corps of Eng'rs, 120 F.3d 664, 669 (7th Cir. 1997)). At the same time, an agency may not completely ignore an applicant's objectives. See id. at 1174-75. Taken together, these directives "instruct agencies to take responsibility for defining the objectives of an action and then provide legitimate consideration to alternatives that fall between the obvious extremes." Id. at 1175. See All Indian Pueblo Council v. United States, 975 F.2d 1437, 1444 (lOth Cir. 1992) (a thorough discussion of alternatives is "imperative"). Accordingly: “In short, the mitigation measures relied upon by the Corps, while mandatory, are not supported by a single scientific study, paper, or even a comment. This Court does not expect the Corps to conduct extensive research on the efficacy of wetland replacement. Neither can the Court defer to the Corps' bald assertions that mitigation will be successful.... As such, the Corps was arbitrary and capricious in relying on mitigation to conclude that there would be no significant impact to wetlands. The Court remands to the Corps to support its reliance on mitigation.”351 F.Supp.2d 1232, 1252, footnote omitted. The court concluded, "This Court will not rubberstamp an agency determination that ... relies on unsupported, unmonitored mitigation measures. NEPA and the CWA require more." 351 F.Supp. 2d 1232, 1252. In this case, the SDEIS relies on a mitigation plan that has yet to be developed, and on mitigation measures that have yet to be disclosed. None of these can be relied upon to reduce environmental impacts because their environmental impacts remain unstudied. In particular, federal agencies must explore alternatives to proposed actions that will avoid or minimize adverse effects on the environment, 40 C.F.R § 1500.2(3), alternative kinds of mitigation measures, 40 C.F.R. § 1508.25(c)(3), alternatives that would help address unresolved conflicts over the use of available resources (e.g. roadless areas and/or potential wilderness), 40 C.F.R. § 1501.2(c), and other reasonable courses of action, 40 C.F.R. § 1508.25(c)(2). The requirement to consider such less damaging alternatives helps agencies meet NEPA's primary purpose of promoting "efforts which will prevent or eliminate damage to the environment and biosphere ... " 42 U.S.C. § 4321. These requirements are affirmed in BLM policy: "BLM officials may not so narrow the scope of a planning/NEPA document as to exclude a reasonable range of alternatives to the proposedaction ... " USDI Instruction Memorandum No. 2001-075. The IBLA has established that the elimination of reasonable alternatives without sufficient analysis does not satisfy NEPA, and noted that "While we could speculate about the BLM's rationale for dismissing ... alternatives, we should not be required to fill in the blanks for BLM. The record should speak for itself." Biodiversity Associates, IBLA 2001-166, at 7 (2001). Such objective evaluation is gravely compromised when agency officials bind themselves to a particular outcome or foreclose certain alternatives at the outset. Importantly, BLM's decision to approve a high-impact project in sensitive and undeveloped lands when lower-impact alternatives (such as a North Park routing alternative) and mitigation measures (such as actually developing mitigation measures rather than deferring their development to an unspecified later time) were readily available has resulted in a project that wreaks unnecessary impacts on the public lands.	
101632	(xiii)	WILDEARTH GUARDIANS,ERIK MOLVAR	Based on earlier BLM analysis, raptor foraging distance around powerlines extends impacts 4.25 miles into surrounding habitats from the line itself. Manier et al. (2014) stated that the "interpreted range" of lek buffer distances for tall structures (such as transmission towers) is 3.1 to 5 miles, based on a review of the available science. Holloran and Anderson (2005) found that 90% of grouse nest within 5.3 miles of active leks. Yet the agency has failed to provide any analysis by alternative regarding how many acres of nesting habitat will be negatively impacted by the transmission line because they are within 4 miles, as discussed below. This violates NEPA. There are no maps showing the proposed routes and how they would cross sage grouse PHMA, GHMA, 4- and 11-mile zones of influence, and how close to leks they each would be. See SDEIS at Appendix A. This is a NEPA hard look violation that hampers the public's ability to judge the environmental impacts to sage grouse, therefore also creating a notice and comment problem. The GIS data are readily available, as evidenced by BLM's reliance on these data to generate summary statistics in the direct impacts section of the SDEIS. The revised proposed route for Segment 8 would cross 71.9 miles of sage grouse habitats. SDEIS at 3.11-8. Route 8G would cross through 93.7 miles of sage grouse habitat (along with the removal of an existing 500 kV line that crosses through 1 mile of habitat). SDEIS at 3.11-11. Trading	The statement is not correct, maps showing the routes and where they are located in relation to sage-grouse habitat were included in the FEIS, a map showing these features for the SEIS is included in Appendix E, see Figure E.11-1.

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			1 mile of habitat impacts to sage grouse for 93.7 miles of impact under 8G appears to be a radical increase in habitat impacts, and the BLM would be better off sticking with the existing, lower-impact line. The impacts analyses disclose acres of habitat directly disturbed for each segment (e.g., SDEIS at 3.11-9, 3.11-11); this is a biologically meaningless metric in the context of impacts to sage grouse and their habitats. For all segment proposed alternatives, the SDEIS fails to provide a scientifically sound metric tied to the actual impacts to sage grouse- the acreage of habitat within 4 miles of the line that would be avoided by sage grouse and where remaining sage grouse would face artificially increased predation levels as a result of raptors roosting on the towers concentrating their hunting activities in habitats nearby. This is a NEPA 'hard look' failure. Proposed Segment 8 would pass within 4 miles of 7 occupied or undetermined sage grouse leks (SDEIS at 3.11-9), Segment 8G passes within 4 miles of91eks (SDEIS at 3.11-12), Revised Segment 8H would pass within 4 miles of 2 leks (SDEIS at 3.11-15), Revised Proposed Segment 9 passes within 4 miles of 17 leks (SDEIS at 3.11-17), FEIS Proposed Segment 9 passes within 4 miles of 20 leks (SDEIS at 3.11-20), and Segment 9K passes within 4 miles of23 leks (SDEIS at 3.11-21). With this in mind, the least impacting option is for BLM to approve Revised Segment 8H only, and not approve any Segment 9 alternative, instead right-sizing 8H to carry all of the electricity to be transmitted. For some states, brood-rearing habitats have been spatially delineated. In the context of another transmission project, Gateway South, being considered concurrently, BLM cites a study (LeBeau 2012) documenting sage grouse avoidance of brood-rearing habitats within 2.9 miles of transmission lines. Gateway South FEIS at 3-375.4 BLM mentions in passing Idaho Game and Fish mapping of brood-rearing habitat in several footnotes and tables (see, e.g., SDEIS at 3.11-3) but makes no effort at all to analyze the impacts of the varying alternatives on brood-rearing habitats. Failure to consider this best available science in the Gateway West SDEIS violates NEPA and BLM sage grouse policy directives. Yet, similar to nesting habitat, BLM has provided no metrics by alternative to describe how many acres of brood-rearing habitat will be negatively affected for each alternative alignment, either through behavioral avoidance or increased predation likelihood. This is a particularly important failing in light of the increased vulnerability of both chicks and hens during the brood-rearing period. 4 LeBeau, C.W. 2012. Evaluation of greater sage-grouse reproductive habitat and response to wind energy development in south-central Wyoming. M.S. Thesis, Univ. of Wyoming. 120 pp. Wintering habitat has been defined for sage grouse populations in Idaho, and is being developed for sage grouse in Wyoming (see, e.g., Smith etal. 2014). Yet BLM did not consider it in the SDEIS. Importantly, Dinkins etal. (2015) found that only 50% of winter concentration areas in their study area fall within designated Priority Habitats. Yet the agency has made no effort to quantify or map the acres of winter habitat adjacent to the line negatively impacted by the project by alternative, or indeed to even mention sage grouse wintering habitats, in violation of NEPA 'hard look' and baseline information requirements.	
101632	(xiv)	WILDEARTH GUARDIANS,ERIK MOLVAR	BLM's cumulative effects analysis on sage grouse is cursory at best and completely absent in many aspects. The sum total of this analysis is a series of tables in which the cumulative acres of disturbance is disclosed for various habitats. SDEIS at 4-46. This table provides no comparison of cumulative impacts by alternative, and therefore provides the agency for no basis for a reasoned choice among alternatives. In the project area, fires have had a major negative impact on sage grouse habitats and populations, degrading or destroying 21.5 million acres of habitat in this Management Zone, with 600,000 burned in a recent southwest Idaho fire. SDEIS at 4-45. Fires such as these, particularly when combined with livestock grazing, foster the invasion of cheatgrass, a non-native invasive weed that destroys habitat values for sage grouse and facilitates unnaturally frequent recurrence of fire, thereby preventing the re-establishment of the sagebrush that sage grouse require as an obligate habitat component (Reisner etal. 2013). BLM notes that livestock grazing has a potential negative effect on sage grouse, but is remiss by asserting that there is little direct evidence linking grazing to sage grouse population declines. FEIS at 4-46. However, numerous studies have linked grass height, driven by livestock grazing, to nest success, which is perhaps the key driver of sage grouse population dynamics (see Gregg etal. 1994, Hagen et al 2007, Doherty etal. 2014, Stiver etal. 20 15). Nowhere does the BLM assess the cumulative effect of adding a major transmission line (or indeed, two) to these existing heavy impacts from livestock grazing, fire, and cheatgrass invasion. Major highways and existing transmission lines are known to have a major negative impact on sage grouse (Wisdom etal. 2011); the cumulative impact of the Gateway West line to	The alternative analysis of effects to sage-grouse is disclosed in Chapter 3, Section 3.11. The cumulative impacts to sage-grouse habitat are disclosed in Section 4.4.13.7, which includes discussion that the decline in sagebrush habitats has resulted from a variety of factors including direct loss of habitat, alterations to regional fire regimes, increased grazing by herbivores, invasion of exotic species, and a lack of successful rehabilitation of impacted area with native shrubland species. Impacts to sage-grouse from tall structures is disclosed in both the FEIS and referenced in the DSEIS; it is also discussed in Section 4.4.13.7. Quantitative values from other projects considered in the cumulative impacts analysis are not available to analyze in consideration with this project, therefore the cumulative impacts analysis to sage-grouse is qualitative. Additional text has been

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			sage grouse would be reduced by co-locating the line with existing highways and/or transmission lines. Some alternatives do this, while others use alignments that depart markedly from existing highways and transmission lines, which means that the impacts to sage grouse are increased above a baseline of minimal existing impact. Because the cumulative effects analysis fails utterly to analyze the degree to which sage grouse habitats are already heavily impacted by existing infrastructure, and does not compare alternatives based on the degree to which the Gateway West transmission line will be crossing pristine or already-degraded habitats through cumulative impacts analysis, the BLM cannot render a fully informed decision among alternative alignments. Importantly, the primary impact of transmission lines to sage grouse is that tall structures can be used for raptor perches and also are behaviorally avoided by sage grouse, as discussed earlier in these comments. This impact is not directly related to acres of surface disturbance, but rather acres of otherwise suitable grouse habitats from which sage grouse would be driven by behavioral avoidance. Similarly, oil and gas development results in behavioral avoidance by sage grouse, with direct impacts from drilling rigs (significant impacts within 3.0 miles), producing wells post-drilling (significant impacts within 1.9 miles), and roads (significant impacts within 1.9 miles) (Holloran 2005). BLM makes no effort to calculate how many acres will experience behavioral avoidance and/or population reduction as a result of these projects, current or future roads, and existing transmission lines. By failing to address the most relevant types of impact in its cumulative effects analysis, BLM violated NEPA's cumulative impacts requirements. We are also concerned that the construction of multiple large-scale transmission lines in close proximity to each other through Idaho will result in a behavioral avoidance from a cumulative perspective that will effectively isolate grouse populations on either side of the proposed line from each other. Elsewhere, BLM itself concedes that scientific studies show that transmission lines can be a movement barrier. See Trans West Express FEIS at 3.8-96. BLM makes no effort to assess the cumulative impacts of these two power lines combined together on grouse migration and dispersal, in violation of NEPA.	added to qualitative cumulative effects analysis in the FSEIS.
101632	(xv)	WILDEARTH GUARDIANS,ERIK MOLVAR	Failure to consider an alternative that implements BLM NTT or USFWS COT recommendations The National Technical Team (2011) recommended that Priority Habitats be exclusion areas for new transmission lines, and that existing lines be buried. The U.S. Fish and Wildlife Services Conservation Objectives Team (2013) report recommends that transmission lines avoid all sage grouse habitats, whether inside Priority Habitats or not, and bury the lines through habitats where avoidances is not possible. These reports reflect the expert recommendations of federal sage grouse biologists, based on a review of the best available science, and reflect what is necessary to maintain sage grouse on the landscape and prevent further population declines. It is reasonable within the framework of BLM's multiple use mandate to consider at least one alternative that avoids Priority and Important Habitats entirely, and another that requires underground transmission through sage grouse occupied habitats. Neither of these alternatives were considered by BLM, despite their reasonableness and the fact that NEPA demands a full range of alternatives be considered, including those that minimize impacts to environmentally sensitive values such as the most sensitive habitats of Candidate Species. In failing to fully consider such alternatives (called for by federal subject-matter experts) in detail, BLM has violated NEPA's range of alternatives requirements.	The routes considered in this SEIS avoid priority habitat with minor exceptions. See Figure E.11-1 in Appendix E.
101633	(i)	THE NATURE CONSERVANCY OF IDAHO,TONI HARDESTY,WILL WHELAN	The SDEIS presents BLM with a difficult choice among competing interests. The Gateway West co-preferred alternatives give rise to significant conflicts involving private lands (Alternative 5), sage-grouse (Alternative 5), and agency policies governing the SRBOP (Alternative 2). The final route selection should be based on a careful weighing of the impacts and the mitigation actions needed to offset those impacts for each alternative. Unfortunately, the Supplemental Draft EIS lacks essential information needed for an informed, reasoned choice among the alternatives. Of particular concern, the document does not assess the indirect impacts of Gateway West on sage-grouse or how these impacts will be mitigated. The Final EIS for Gateway West Segments 1-7 noted that transmission lines cause avoidance behaviors, increased predation, and habitat fragmentation that could affect grouse many kilometers from the transmission line. For this reason, the Final EIS stated that analysis of indirect effects “is a critical component of an impacts analysis.”1 SDEIS Table D.11-17 identifies 10 leks within 5 km of Alternative 5. The SDEIS does discuss the scientific basis for these indirect effects and a proposed methodology for quantifying them. Specifically, the SDEIS incorporates a White-Paper developed by the Bureau of Land	The SEIS identifies indirect impacts to sage-grouse as an issue and qualitatively discloses the potential impacts. The SEIS further requires that the Applicant develop compensatory mitigation to address these unaccounted indirect impacts, and recommends that the applicant use the white-paper methods to quantify their compensatory mitigation obligations for these unaccounted indirect effects.

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			Management (BLM) and U.S. Fish and Wildlife Service (USFWS) outlining "what would be acceptable to the BLM and USFWS regarding how to calculate the extent of required mitigation related to indirect impacts."2 Conservancy scientists find that the White-Paper correctly summarizes the relevant research establishing the existence and magnitude of indirect impacts and sets forth a well-reasoned approach for quantifying those impacts.3 The White-Paper reveals that indirect impacts are by far the most consequential type of sage-grouse impact associated with the transmission line, and that there is ample scientific evidence to support the recommended distances and habitat services reductions. The following table from the White-Paper summarizes those effects: 1 Final Environmental Impact Statement for the Gateway West Transmission Line Project at 3.11-135. 2 SDEIS at 3.11-34, citing Assessing Indirect Effects of Transmission Lines on Greater Sage-Grouse for the Gateway Wet Interstate Transmission Line Project, Prepared Jointly by U.S. Fish and Wildlife Service and Bureau of Land Management, June 3, 2015 (White-Paper). 3 The fact that indirect impacts are difficult to quantify does not justify excluding them or reducing their extent. The Council on Environmental Quality has explained that, where indirect impacts are "reasonably foreseeable," "[t]he agency has the responsibility to make an informed judgment, and to estimate future impacts on that basis…. The agency cannot ignore these uncertain, but probable, effects of its decisions." Council on Environmental Quality, Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, 46 Fed. Reg. 18026 (March 23, 1981) at Question 18. See 40 C.F.R. § 1508.8(b). Summary of Indirect Impact Zones and Percent of Habitat Services Reduced4 [table below formatted as follows: Indirect impact type -- impact zone (meters from centerline) -- habitat services reduction (%)] Avoidance -- 0-600 m -- 75-90% Increased Avian Predator Presence and Predation -- >600-1,200 m -- 20-50% Decreased Productivity and Survival -- >1,200-5,000 m -- 5-40% The Conservancy places special importance on the avoidance impact zone of 600 meters. We note that the habitat services reduction of 75-90% in this impact zone is not conservative. Data suggest that sage-grouse essentially abandon this habitat. The Conservancy's comments on the FEIS included a discussion of the available research and recommended a 100% habitat services reduction within 600 meters of the transmission line. Those comments are incorporated here by reference. The strongest scientific evidence (indicated as "HIGH" in White-Paper Table 2 by the Confidence in the Zone of Influence indicator) is for the Avoidance and Increased Avian Predator Presence and Predation zones, but even the Decreased Productivity and Survival Impact Type has a reasonable scientific foundation, and additional relevant science supports these distances (Steenhof et al. 1993, Rodgers 2003, Walker et al. 2007). Despite the clear significance of indirect effects, the SDEIS makes no attempt to apply the White-Paper methodology – or any other methodology – to disclose what the indirect effects of the Gateway West alternatives actually are. We find no discussion of the number of acres of general, important, and priority sage-grouse habitat within the impact zones. There is no discussion of the losses of habitat services or the potential consequences for sage-grouse populations. The failure to address indirect effects also extends to the SDEIS' consideration of sage-grouse mitigation. The Habitat Equivalency Analysis (HEA) model used to scale mitigation for the Proponents' sage-grouse mitigation plan does not consider the indirect impacts discussed in the White Paper. 4 White-Paper at 12. The SDEIS concedes that the Greater Sage-Grouse Habitat Mitigation Plan developed for the project is not adequate to address these indirect impacts.5 Rather than address this gap, the SDEIS simply states "[t]he USFWS and BLM will continue to work with the Proponents regarding required mitigation for indirect impacts to sage-grouse."6 In short, the SDEIS contains no meaningful discussion of the extent of, or mitigation for, the most significant impact of the transmission line on sage-grouse. Recommendation: The BLM should use the White-Paper as the basis for determining indirect impacts of and mitigation requirements for Gateway West. Any substantial change in the White-Paper methodology should be subject to public disclosure and comment. Results of the indirect impacts analysis using the White-Paper should be the focus of additional public involvement opportunities.	

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101633	(ii)	THE NATURE CONSERVANCY OF IDAHO,TONI HARDESTY,WILL WHELAN	The BLM Should Link the Project's Sage-Grouse Mitigation Plan to Recent Agency Policies. The SDEIS notes that BLM and the U.S. Fish and Wildlife Service (USFWS) have made significant strides in developing policies and strategies to guide sage-grouse mitigation since the publication of the Final Environmental Impact Statement and Record of Decision for Gateway West Segments 1-7. These include: The BLM issued guidance on mitigation in a Draft Regional Mitigation Manual (BLM 2013c) to implement Secretarial Order 3330 (October 31, 2013), Improving Mitigation Policies and Practices of the Department of the Interior. The U.S. Fish and Wildlife Service issued its Greater Sage-Grouse Range-Wide Mitigation Framework in September 2014. In October 2015, the U.S. Department of the Interior released Manual 600 DM 6, Implementing Mitigation at the Landscape-scale (DOI 2015), which also implements landscape-scale mitigation for impacts from projects. On November 3, 2015, the BLM received the Presidential Memorandum: Mitigating Impacts on Natural Development and Encouraging Related Private Investment (80 Federal Register 68743) The BLM issued a ROD for Approved RMP Amendments for the Great Basin Region, Including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, Utah. 5 SDEIS at 3.11-34. 6 SDEIS at 3.11-34. The Final EIS should expressly incorporate these policies into the mitigation plans for Gateway West. In particular, we request that the BLM explain how the sage-grouse mitigation approach will address the following key elements of these policies: 1. Landscape-scale approach: Analyses of proposed development and mitigation should use a landscape-scale approach to prioritize conservation in areas with important values. In this context, we are particularly interested in how the BLM and the Proponents will site mitigation projects in areas that optimize benefits to sage-grouse. 2. Mitigation goal: The SDEIS does not state a clear goal for setting the proponents' mitigation obligations – such as no net loss or net benefit. 3. Determining Which Measures Qualify for Mitigation Credit and How to Quantify Credits: There is still some confusion regarding whether and how to count the benefits from certain types of mitigation actions. Examples include: protection measures such as conservation easements, fuel breaks and fire suppression activities, and research. 4. Ensuring that Benefits are Measureable and Use of Habitat Quantification Tools: Significant progress has been made since the FEIS in developing tools for quantifying debits and credits associated with infrastructure development in sage-grouse habitat. The Gateway West Habitat Equivalency Analysis was used only for direct effects and has shortcomings pointed out in previous comments by the Conservancy and others. How will habitat losses caused by indirect impacts and offsetting benefits of mitigation projects be quantified and measured? 5. Mitigation Standards: What polices will govern the issues of baseline analysis, additionality, durability, mitigation project effectiveness and risk, mitigation site stewardship, and monitoring? 6. Transparency and Governance: How will mitigation standards, strategies, and outcome be communicated to the public and stakeholders? How will on-going actions be overseen? This list of key mitigation policy elements reflects the core topics that state and federal agencies are addressing currently in the implementation of various Department and land use plan directives. It is imperative that mitigation for Gateway West be harmonized with this policy development process. Recommendation: The public involvement process, FEIS, and record of decision should discuss and incorporate the issues and policy elements discussed above.	The SEIS describes how current DOI policies and CEQ regulations on mitigation are being applied to the Gateway West project. The compensatory mitigation plan for sage-grouse impacts from the 2013 Final EIS will be carried through and applied to Segments 8 and 9 where appropriate, if those segments are authorized. The SEIS finds that the 2013 plan does not adequately address indirect effects to sage-grouse and discusses additional mitigation measures that will be required. Mitigation for effects to sage-grouse must result in a net conservation gain. Although the conservation management standard for greater sage-grouse of "net conservation gain" in PHMA and IHMA from the 2015 land use plan amendments does not apply to the Gateway West Project, the BLM would seek to apply mitigation, including compensatory mitigation, to achieve an overall "net conservation gain" in connection with the Project. These mitigation measures would follow the process set forth in the Greater Sage-Grouse Habitat Mitigation Plan.
101633	(iii)	THE NATURE CONSERVANCY OF IDAHO,TONI HARDESTY,WILL WHELAN	BLM and the Proponents Should Coordinate with the State of Idaho to Allow Proponents to Use the Idaho Mitigation Framework to Design and Implement Gateway Sage-Grouse Mitigation. The State of Idaho is working with BLM and USFWS to develop an operational sage-grouse mitigation program based on the Idaho Mitigation Framework. This program is intended to provide an efficient, accountable, and highly targeted approach to sage-grouse habitat protection and restoration. Recommendation: The Conservancy requests that sage-grouse mitigation plans for Gateway West be designed to allow the Proponents to use the Idaho Mitigation Framework when it is complete.	As Cooperating Agencies for the Gateway West project, the State of Idaho and the USFWS continue to be fully engaged in developing sage-grouse mitigation for Segments 8 and 9 as described in this SEIS.

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101633	(iv)	THE NATURE CONSERVANCY OF IDAHO,TONI HARDESTY,WILL WHELAN	Additional Public Involvement Is Necessary to Meet the Purposes of NEPA. The Conservancy is sensitive to the desire to avoid further delays in the project schedule. We would like to work with BLM, the Proponents and other stakeholders to design a process that will provide timely, efficient, and meaningful public input while minimizing any changes in the project review timeline. Rules implementing the NEPA give BLM broad flexibility to craft procedures to improve public involvement, including holding public meetings, whenever appropriate.7 Additional public involvement should focus on three topics: analysis of indirect effects on sage-grouse, compensatory mitigation for sage-grouse impacts, and mitigation at the SRBOP. This does not mean that a full and final mitigation plan must be presented in the EIS. The goal should be to provide enough detail concerning the mitigation measures to allow agency decision makers, and the public, to make a reasoned evaluation of the Project's impacts and alternatives. Compensatory mitigation is central – not merely incidental – to the evaluation of environmental impacts of and alternatives to the project in the EIS. Mitigation cannot be deferred to internal, post-NEPA processes. An EIS must discuss mitigation "in sufficient detail to ensure that environmental consequences have been fully evaluated."8 "It is not enough to merely list possible mitigation measures."9 The document should include a clear discussion of mitigation commitments considered in the EISs, descriptions of the expertise and professional judgment applied in determining appropriate mitigation commitments, and analysis of when and how those mitigation commitments will be implemented. Recommendation: BLM should schedule public involvement processes prior to completing a supplemental FEIS that permits stakeholders to understand, review, and comment sage-grouse impact analysis as well as mitigation strategies and commitments.	The compensatory mitigation plan for sage-grouse impacts from the 2013 Final EIS will be carried through and applied to Segments 8 and 9 where appropriate, if those segments are authorized. The SEIS finds that the 2013 plan does not adequately address indirect effects to sage-grouse and discusses additional mitigation measures that will be required. Mitigation for effects to sage-grouse must result in a net conservation gain. Although the conservation management standard for greater sage-grouse of "net conservation gain" in PHMA and IHMA from the 2015 land use plan amendments does not apply to the Gateway West Project, the BLM would seek to apply mitigation, including compensatory mitigation, to achieve an overall "net conservation gain" in connection with the Project. These mitigation measures would follow the process set forth in the Greater Sage-Grouse Habitat Mitigation Plan. With respect to the SRBOP, while it is not intended to be a site-specific mitigation plan, the Framework presented in Appendix K of this Final SEIS (1) discusses to the level of detail possible at this stage of the process how avoidance and minimization would eliminate and/or reduce impacts; (2) identifies remaining (i.e., residual) impacts to be addressed through compensatory mitigation; and (3) establishes the process for assessing the compensatory mitigation obligation to achieve enhancement of resources. Once the final routes are selected in the ROD (assuming that the No Action alternative is not selected), the Proponents will complete final engineering and design for the project. Next, a working group, which would include representatives from the BLM and the Proponents and potentially others as appropriate under applicable statutes and regulations, will apply the Framework to the final engineering and design for the approved routes to determine 1) the remaining direct and indirect impacts and 2) the site-specific suite of compensatory mitigation measures. The working group will then use these results to produce a compensatory mitigation plan to achieve enhancement of resources within the SRBOP. That working group will submit the compensatory mitigation plan to the BLM Authorized Officer for his/her approval. The approved compensatory mitigation plan will then be implemented along with or prior to the Notice(s) to Proceed.

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				Three types of compensatory mitigation for the Framework and eventually the Compensatory Mitigation Plan as outlined in Appendix K are: 1. Habitat which includes vegetation restoration, fuels management and fuel breaks, wildland fire preparedness and suppression, applied research and monitoring for adaptive management, land acquisition 2. Recreation and Visitor Services which includes recreation, visitor services, environmental education, visual resources, law enforcement, and potentially land acquisition. 3. Cultural Resources and National Historic Trails (non-Sec. 106) which includes addressing Tribal concerns, interpretation, preservation measures, and potentially land acquisition.
101633	(v)	THE NATURE CONSERVANCY OF IDAHO,TONI HARDESTY,WILL WHELAN	The Proponents' Proposed Oversight Committee Opens an Important Opportunity for Public Involvement in Mitigation Planning and Implementation. These comments have thus far addressed the need for public comment prior to the issuance of a Record of Decision (ROD) for Gateway West Segments 8 and 9. The BLM should also commit to transparent and inclusive approach for implementing mitigation after the ROD. The project proponents recognize these challenges in their compensatory mitigation proposal at Appendix C-3 of the FEIS/ROD and propose a collaborative "oversight committee" to help them select appropriate projects and locations. We think that this approach has merit and encourage BLM to include it in the Record of Decision (ROD). The ROD should elaborate on the committee's composition and responsibilities and its approach to transparency and public involvement. The BLM should also give the Oversight Committee broad authority to align compensatory mitigation measures with the BLM's Manual provisions on mitigation and the Idaho Mitigation Framework. Specifically, we request that the oversight committee be given broad latitude to address: 1. The selection of mitigation sites based on a landscape analysis that considers locations that provide greatest benefit to sage-grouse populations, ensure compatible land management policies and practices, and maintain the persistence of mitigation benefits; 2. The mix of conservation projects included in the compensatory mitigation package; 3. Estimates of conservation project cost and mitigation benefit (uplift); and 4. Stewardship and monitoring plans. The oversight committee should have discretion to direct mitigation funds to off-site projects in accordance with BLM's landscape approach to mitigation and the Idaho Mitigation Framework.	The BLM is not planning to implement the Proponents' compensatory mitigation proposal (DSEIS Appendix C). The Framework presented in Appendix K supersedes this proposal and includes a description of oversight mechanisms with respect to the SRBOP.
101633	(vi)	THE NATURE CONSERVANCY OF IDAHO,TONI HARDESTY,WILL WHELAN	The Proponents' Monitoring and Enhancement Plan (MEP) for the SRBOP Is Innovative and Cooperative; The BLM Should Discuss How Mitigation Policies Discussed Above Apply to the MEP. The SRBOP has experienced severe habitat degradation since it was designated by administrative action in the late 1970s. The area stands to benefit greatly from investment in sound restoration and enhancement measures. Unfortunately, the policy and scientific framework for compensating for the impacts of transmission lines to raptors, their prey, and other SRBOP resources is not as defined as it is for impacts to sage-grouse and their habitats. We appreciate the Proponents' effort to produce a thoughtful, innovative, and cooperative MEP despite the lack of clear governing policies. As a general matter, the Conservancy agrees with the Proponents that appropriate mitigation and enhancement measures include habitat restoration, acquisition of priority inholdings, and removal of existing infrastructure. We also agree that the additional categories of mitigation action suggested by the	The BLM is not planning to implement the MEP. The Framework presented in Appendix K of this Final SEIS supersedes the MEP and describes compensatory mitigation assessment in greater detail than the Draft SEIS.

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			BLM, with the exception of applied research, are appropriate for consideration in the MEP. The Proponents' idea of creating a Portfolio Fund, with a management fund, makes sense. This allows the use of the funds to be collaboratively guided by agencies and entities that have an understanding of and long-term commitment to the SRBOP. We would like to see additional detail regarding the basis for determining the adequacy of the management fund. We also encourage the Proponents to provide funds in advance of the Notice to Proceed in order to ensure that mitigation benefits accrue as soon as possible to the timing of project impacts. The Conservancy agrees with BLM that additional detail is needed in order to determine whether the MEP will meet objectives, and that mitigation actions should offer measureable environmental benefits. Given the importance of mitigation and enhancement in the SRBOP, the BLM should provide this additional detail for public review and comment. The model compensatory mitigation accounting system that BLM presents in Appendix K is an important step forward in providing a more detailed discussion of mitigation. Although, the Conservancy does not have specific technical comments at this time, we encourage BLM to further refine this approach. It is important to note that Appendix K sets forth only a conceptual model for quantifying impacts. The EIS should discuss the actual results of applying the model to the Gateway West project. Other key issues that should be addressed in the EIS should include: 1. Defining the mitigation and enhancement goal. What level of mitigation and enhancement meets applicable legal standards? Are the proponents proposed ratios sufficient? 2. Quantifying credit for particular actions: Actions such as fuel breaks and law enforcement may provide benefits. How will credits associated with these activities be quantified or assessed? 3. Landscape-Scale Approach: We would like to see more detail about how projects will be prioritized – both in terms of location and project type. 4. Mitigation Policy Issues: The EIS should discuss key components of mitigation policy, including risk of project failure, time lag between project impact and conservation benefit, additionality, and durability. Recommendation: BLM should explain the results of applying the Appendix K methodology to the Gateway West routes under consideration, provide additional detail on the mitigation strategy and approach as discussed above, and provide for public review and comment on these points before a final decision is reached.	
101634	(i)	CONSERVATION LANDS FOUNDATION,DANIELLE MURRAY	Co-Preferred Alternatives 2 & 5 We commend the agency for the amount of time and resources dedicated to engaging the local public during this process, however neither alternative 2 nor 5 meet the current legal and policy requirements outlined above. Both alternatives are sited within the NCA (Alt. 2 for 35.1 miles and Alt. 5 for 19.7 miles) and BLM has not demonstrated how the siting of a transmission line meets established legal and policy standards. To determine a viable option, the BLM must: 1) demonstrate that the siting, construction and maintenance of a transmission line through the NCA protects, maintains or enhances: 1) raptor populations and habitat; and 2) natural, environmental, scientific, cultural and educational resources and values; and 2) apply its own policy and the appropriate standards when considering siting segment 8 and 9 of the Gateway Transmission Line. While Alternative 5 is the least impactful of the co-preferred alternatives, BLM cannot demonstrate that building and maintaining 19.7 miles of a high voltage transmission line results in a benefit to the NCA.	The BLM greatly appreciates the Foundation's comments and continuing involvement in the SEIS process. All of the action alternatives analyzed in the SEIS impact the NCA to some extent by crossing it. Some of the new information that led to the determination to prepare the SEIS is policy direction on management of NCAs in the BLM National Conservation Lands. The Draft and Final SEIS discuss the issue of compatibility in the sections of Chapter 3, Affected Environment, that identify resources and values present in the SRBOP NCA. The Final SEIS has added a separate section (3.24) to discuss NCA Values. The Final SEIS presents a Mitigation Framework (Appendix K) that applies the mitigation hierarchy to arrive at compensatory mitigation measures that are intended to enhance NCA resources determined to be impacted by the project. The Framework (1) describes how avoidance and minimization would eliminate and/or reduce impacts; (2) identifies remaining (i.e., residual) impacts to be addressed through compensatory mitigation; and (3) establishes the process to assess the compensatory mitigation obligation to achieve a no net loss, or as required or appropriate, a net benefit to resources.

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101634	(ii)	CONSERVATION LANDS FOUNDATION,DANIELLE MURRAY	BLM has previously acknowledged that the proponent's Mitigation and Enhancement Portfolio (MEP) "does not provide sufficient details or specifics for development of such mitigation actions related to habitat restoration" making it "unclear how the MEP goals would be achieved" (Draft SEIS). However, in the Draft SEIS the BLM does not outline how the agency intends to meet their mitigation and enhancement obligations, specifically as it relates to the NCA. Instead the Draft SEIS states it will, in essence, figure that out during a later process.1 As part of the co-preferred alternatives BLM must provide a mitigation plan to address all the impacts to the resources (both within the NCA and not). Delaying the mitigation component of this plan to a later date is not appropriate.	The BLM does not intend to implement the Proponents' MEP. The Final SEIS presents a Mitigation Framework (Appendix K) that applies the mitigation hierarchy to arrive at compensatory mitigation measures that are intended to enhance NCA resources determined to be impacted by the project. Please see response to previous comment for more detail.
101635	(i)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	Idaho Farm Bureau supports the placement of segments 8 and 9 of the GWTLP as proposed in Alternative 1, crossing the Snake River Birds of Prey National Conservation Area (SRBOP) and paralleling existing transmission lines. Reluctance to site the project on federally managed land that has existing infrastructure for the installation and maintenance of transmission lines, while limiting unnecessary impact on private property and critical wildlife habit, is irrational and irresponsible.	Your comments on the benefits of Alternative 1 are noted.
101635	(ii)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	The Owyhee County Task Force (OCTF) proposed a carefully considered placement of the GWTLP that balanced the needs of the local economy with protection of resources. The OCTF proposed that the transmission lines only cross private property where landowners were willing to allow a right-of-way to be negotiated, and where much of the route paralleled existing lines through the SRBOP. The Boise District Resource Advisory Council (RAC) also recommended these routes, which Rocky Mountain Power and Idaho Power have adopted as their proposed routes. With two confirmed National Energy Corridors included in the SRBOP Resource Management Plan (RMP), and whereas, the utilization of these corridors is encouraged by Bureau of Land Management (BLM) national policy and the RMP, it is only logical that segment 8 and 9 be sited on these locations as outlined in Alternative 1. Throughout the documents of the Supplemental Environmental Impact Statement (SEIS) it states that crossing the SRBOP "would not meet the intent of the enabling legislation for the SRBOP." We disagree with this statement, and would argue that siting these transmission lines across the SRBOP does in fact conform to the enabling legislation. In Section 1, part 5 of the Enabling Legislation for the SRBOP, it stats that protection of the conservation area can be best accomplished with a management plan that: "(D) allows for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats and protection and sound management of other resources and values of the area". These proposed transmission lines would not adversely affect the resources and values for which the SRBOP was designated, but would rather mitigate impacts to raptor habitat and enhance the bird's population. Both cultural and scientific resources would also improve with such transmission line placement, only furthering the conformation of the intent of the enabling legislation. To discard both OCTF and the RAC's efforts to propose GWTLP placement under the pretense of ambiguous language in the enabling act of the SRBOP is absurd. The purpose of the SRBOP is "to provide for the conservation, protection and enhancement of raptor populations and habitats". Given the BLM's own studies that indicate that power transmission lines actually enhance raptor habitat, Idaho Farm Bureau requests that segments 8 and 9 of GWTLP be sited as outlined in Alternative 1, crossing the SRBOP.	We recognize that the task force has worked hard to resolve issues within Owyhee County. The BLM must consider issues beyond just meeting the needs of the county. The BLM engaged the local community and the RAC in a process which it hoped would lead to a consensus. However, the BLM must balance the desire for consensus with its obligation under congressional legislation that established the NCA, as well as other laws and regulations.
101635	(iii)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	In an effort to protect the greater Sage Grouse and its habitat, Farm Bureau members have worked closely with the Governor's Sage Grouse task force to ensure continued success in this species preservation. Siting segments 8 and 9 of the GWTLP outside of the locally supported proposed routes, and pushing these transmission lines through preliminary priority habitat (PPH) will severely detract from the accomplishments of so many stakeholders that have worked tirelessly to reestablish this bird. In a previous letter submitted by Idaho Farm Bureau on the subject, we quote from one the biologists who studied the effects of transmission lines through the SRBOP, Karen Steenhof. Her comments directed to Carl Rountree, Director of National Landscape Conservation System, state: "A new transmission line in Owyhee County [segment 9 as proposed in Alternative 2 and 5] would attract raptors and ravens and could lead to increased predation on declining Greater sage-grouse populations. Golden eagles prey on adult Sage Grouse, and Common Ravens are a major predator of Sage Grouse eggs. Recently, Idaho State University (ISU) biologists have noted a dramatic increase in the predation of Sage Grouse by ravens. Where there are more ravens, nesting female Sage Grouse stay on their nests much longer,	Your comments on the benefits of Alternative 1 are noted. The impacts that the various alternatives would have to sage-grouse are disclosed in the SEIS.

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			leaving less often. Less time foraging may cause 'substantial physiological distress' on the Sage Grouse. It would be better to attract raptors and ravens to cheatgrass areas in the NCA where they feed on ground squirrels than to the shrubsteppe areas inhabited by sage-grouse in Owyhee County." Specifically, in Owyhee County, our members favor Alternative 1 as it is the route with the least impact on Sage Grouse. As specified in Table ES-4 in the Executive Summary of the GWTLP, a considerably larger amount PPH will be disturbed and affected in the Agency Co-Preferred Alternatives in comparison to Alternative 1. A number of Idaho environmental groups have commented that the BLM's Co-Preferred Alternatives for segment 9 PPH, as identified in the BLM's Greater Sage-Grouse Interim Management Policies and Procedures, IM 2012-043 (12/27/11), "comprises areas that have been identified as having the highest conservation value to maintaining sustainable Greater Sage-Grouse populations". IM2012-043 requires additional procedures for pending ROW applications that would affect more than 1 linear mile of Sage Grouse habitat. Segment 9 as presented in alternatives 2-7 would affect nearly fifty miles of PPH according to the environmental groups' assessments. In consideration of the admirable work that has been accomplished in the preservation of PPH for Sage Grouse, Idaho Farm Bureau requests that the Agency Co-Preferred Alternatives (2 and 5) not be considered for the placement of segments 8 and 9 of the GWTLP.	
101635	(iv)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	It is disappointing that the two Agency Co-Preferred Alternatives would affect more prime farmland than the locally supported proposed route (Alternative 1). As specified in Table ES-4 of the Executive Summary, up to an additional 59 acres of prime farmland would be impacted by the Agency Co-Preferred Alternatives. Furthermore, Alternative 2 would affect a total of 49 acres of irrigated agriculture land, with the potential of completely altering these farming operations. These impacts are unacceptable and deplorable, particularly when a viable alternative exists and has been recommended by other local groups. The BLM states that their decisions "could affect private lands adjacent to or between federal areas" on page 3.18-1 of the FEIS/Legacy Document. As previously expressed in former letters, Idaho Farm Bureau members fully understand that the BLM only has the authority to give final approval of the transmission line routes on federal land. However, when the BLM authorizes the route on federally managed land, its decisions directly impact the location of the transmission lines on private property. Indeed, the BLM does directly impact how much private property is affected in this project. There are legitimate concerns that landowners will be in a worse position with the GWTLP crossing their property than they would be otherwise. If these concerns are realized, it will have a detrimental effect on each agricultural operation, which, when taken in aggregate, will make the local economy worse off than it would have been without the GWTLP. This will mean fewer agricultural jobs, fewer purchases at local businesses, and a lower multiplier in the local economy. Only 17% of the land in Owyhee County is privately owned. Every acre of private land lost in the county due to this project will only further strain the local economy. Greater use of federally managed lands for the routing of the GWTLP, particularly on the SRBOP, would alleviate these potentially devastating consequences to the county, its economy and the agricultural sector. As mentioned in previous comments, there still is serious concern from our members over the impact to agricultural operations of the GWTLP. The threat of eminent domain in private property negotiation has not been fully addressed. The truth is that very rarely, if ever, is a private landowner fully compensated for the value of the actual land he loses. The additional out-of-pocket expenses the landowner bears each year in perpetuity, the loss of efficiency to his operation, the loss of future upgrades/expansions he will have to forego and any other related losses he may also suffer are not fully considered. Such costs, both tangible and intangible, can be much higher than the value of the actual land lost to construction of the project. Without the threat of eminent domain, the proponents would indeed be forced to pay what the various landowners needed in order to make an equitable agreement. Furthermore the compensation for easement acquisition does not address whether the difference in value is on the entire farming operation before and after the project is completed, or simply on the actual "affected property". Loss of prime agriculture land and private property, coupled with property devaluation, shrinking local economies and poor compensation processes, lead us to further argue against the consideration and use of the Agency Co-Preferred Alternatives.	The impacts that the various alternatives would have to private lands and the local economy is disclosed in Sections 3.4 and 3.17 of the SEIS. Alternative 5 would cross the fewest miles of private land, approximately 32.7 miles, compared to 50.5 miles for Alternative 1 and 64.1 for Alternative 2. Considering only Owyhee County, the Revised Proposed Route for segment 9 crossed 5.8 miles of private land while Route 9K crosses 7 miles. FEIS Proposed Route crosses 21.8 miles.

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101635	(v)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	In a meeting with the Owyhee County Commissioners, the Farm Bureau learned about further concerns with the GWTLP and the placement of segments 8 and 9. The cavalier attitude of the BLM towards the residents, commissioners and local groups of Owyhee County, and their disregard of such input has created ill feelings toward the project. With more apparent value being given to bureaucratic philosophy rather than carefully studied and considered local contribution, the county seems to have little interest in further negotiations. The agency electing alternatives that are in large contrast to that of which is locally supported is appalling and discouraging. We argue that more attention of the local feedback is deserved considering that the residents of Owyhee County will be the people who will be living with the impacts of the GWTLP long after its construction and completion.	The BLM has conducted multiple outreach efforts and public scoping. Input from local communities and governments has been sought and obtained (including these comments). The NEPA process requires that a reasonable range of alternatives be considered in an EIS, therefore, we do not only analyze a single alternative in this EIS. The EIS is not a decision document, and no decision has been made at this time. The decision would be made in a ROD.
101635	(vi)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	The placement of this energy infrastructure in a socially disadvantaged community is deplorable and arguable unlawful. Placement of segment 8 and 9 as presented in Alternatives 2 and 5 will only further hinder the future development and economic growth of struggling communities. Furthermore, the Agency Co-Preferred Alternatives would require large amounts of infrastructure investments. Additional roads, right-of-ways, and maintenance areas will have to be constructed for these routes, whereas, much of this infrastructure currently exists for the routes proposed in Alternative 1, requiring far less disturbance of private property, natural resources and wildlife habit. Proponents of the Agency Co-Preferred Alternatives are in effect advocating for unnecessary environmental impacts.	Your preference for Alternative 1 is noted. The Project's impacts on the economy of local comminutes are addressed in Section 3.4, while impacts to "socially disadvantaged" and "minority communities" (as defined by CEQ and USEPA under Environmental Justice regulations) are addressed in Section 3.5.
101635	(vii)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	Additionally, Alternatives 2 and 5 of segments 8 and 9 of the GWTLP lack cultural sensitivity to many of the residents of Owyhee County. For example, Joyce Ranch is a 150 year old ranch in Owyhee County that has supported not only a way of life for its ranching families, but also their culture and values. For multiple generations, the Joyce Ranch has sustained its existence and cherished its traditions. Placement of the transmission lines for segments 8 and 9 as proposed in Alternatives 2 and 5 will greatly impact this historic operation, and diminish the value of this honorable trade and culture.	While Alternative 1 may affect fewer the residents in Owyhee County, Alternative 1 affects landowners in other counties, which is also a concern. More private land is crossed by Alternative 1 than Alternative 5. Alternative 5 would cross the fewest miles of private land, approximately 32.7 miles, compared to 50.5 miles for Alternative 1 and 64.1 for Alternative 2. Considering only Owyhee County, the Revised Proposed Route for segment 9 crossed 5.8 miles of private land while Route 9K crosses 7 miles. FEIS Proposed Route crosses 21.8 miles.
101635	(viii)	IDAHO FARM BUREAU FEDERATION,BRADEN JENSEN,BRYAN SEARLE	After reviewing the SEIS and the seven BLM Action Alternatives, we are not persuaded that the BLM has shown conclusive and convincing proof that the Agency Co-Preferred Alternatives (2 and 5) for segments 8 and 9 are better choices than the locally supported route of Alternative 1. Even when viewed through the lens of the agencies own regulations, there is no advantage to the co-preferred alternatives, and in many cases the locally supported alternatives are superior using the agency's own criteria. Therefore, we urge you to abandon the Agency Co-Preferred Alternatives for segments 8 and 9 in favor of the routes that have been supported by local stakeholders who live, work and own property along the routes. We respectfully request the BLM support Alternatives 1 for the GWTLP for the transmission line segments 8 and 9.	Comment noted. Your support for Alternative 1 is noted.
101636	(i)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	1 -- 2 Manual 6280 -- NA -- NPS --Please add a section for construction impact minimization measures for construction at or visible from High Potential Route Segments (HPRSEG's) and High Potential Historic Sites (HPHS's) of the Oregon National Historic Trail (NHT). In addition to the environmental protection measures already identified, the NPS recommends special attention to deterring vandalism associated with increased access, location of construction staging to minimize disturbance and visual intrusion, fire prevention, advance communication to trail users, dust suppression, and rehabilitation of disturbed sites.	Avoidance and minimization measures are included in the EPMs and the HPTP. These include VIS-6, VIS-11, and CR-1 through 8 in Appendix M. Also see Appendix K to this Final SEIS.
101636	(ii)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	2 -- 21-60 Manual 6280 -- NA -- NPS -- AU1 is rated highly sensitive, encompassing Hagerman Fossil Beds National Monument, Upper Salmon Falls HPHS and Three Island Crossing HPHS. The NPS recommends the BLM choose an alternative that avoids AU1 and avoids related NHT and Monument impacts.	According to selection of routes, the BLM will apply the Mitigation Hierarchy to first, avoid then, minimize and finally require compensation for impacts that may be authorized.

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101636	(iii)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	3 -- 70 Manual 6280 – NA -- NPS -- Cumulative effects are considered for the physical operational life of the project plus site rehabilitation after decommissioning, a total of 60 years. The Project could result in substantial cumulative adverse effects to the NHT. Please consider this full long-term scale of impacts on NHT resources and visitor/recreational experience when determining avoidance, minimization, and compensatory mitigation measures for National Historic Trail impacts in both the NEPA and the NHPA processes.	The Mitigation Framework described in Appendix K of the Final SEIS details how the BLM will apply the Mitigation Hierarchy to direct, indirect and cumulative effects of the project. The HPTP and other requirements under Section 6280 of NHPA will specify mitigation for NHT impacts.
101636	(iv)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	4 -- 78 Manual 6280 – NA -- NPS -- "In the event of unavoidable adverse impacts to the Oregon NHT and or the North Alternate Study Trail, the Historic Property Treatment Plan may stipulate compensatory mitigation measures." The NPS looks forward to participation in the NHPA Section 106 process. Compensatory mitigation for impacts may be required in different documents throughout the project authorization, construction, operation, and decommissioning processes. The NPS encourages the BLM to calculate all compensatory mitigation to reflect the full duration of impacts.	The BLM looks forward to ongoing collaboration with NPS in implementing the HPTP.
101636	(v)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	5 -- ES-2 DSEIS -- 2 and 14 -- NPS -- The NPS appreciates the landscape scale protection approach to compensatory and enhancement mitigation measures planned for the Snake River Birds of Prey National Conservation Area. Consistent with Secretarial Order 3330 and with DOI 600 DM 6, the NPS urges similar protective avoidance, minimization, and compensatory mitigation consideration for the Oregon NHT and Hagerman Fossil Beds National Monument. In recent years, the NPS has reached compensatory mitigation agreements for renewable energy and transmission infrastructure Gateway West transmission project NPS comments on Draft Supplemental EIS June 2016 Comment Number Page Number Line Number Commenter Comment or Text Revision impacts to the Juan Bautista de Anza National Historic Trail, to Joshua Tree National Park, and to Delaware Water Gap National Recreation Area. Impacts of concern have included (but were not limited to) increased access to sensitive areas, OHV impacts, post-disturbance invasive vegetation encroachment, and changes to the visitor experience.	The Mitigation Hierarchy will be applied to residual impacts on resources and values, and at the points in the process that specific mitigation projects may be considered and approved through the HPTP. Examples of compensatory mitigation from other projects NPS may be considered as the Gateway West process proceeds.
101636	(vi)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	6 -- 1-10 DSEIS -- 6-11 -- NPS -- The BLM is proposing and analyzing changes to the Resource Management Plan (RMP) as a part of this SDEIS. Currently, the RMP does not include Trail Management Corridor designations. Increasingly, BLM resource management plans are making protection of NHT resources a priority by creating NHT management corridors of ten to 12 miles width (5-6 miles on each side of the trail centerline). Other BLM RMP Land Use Plan Amendments have created No- Surface-Occupancy stipulations and other trail protections within a Management Corridor. The NPS requests that the BLM add a Land Use Plan Amendment in this decision to establish National Historic Trail protections such as a Trail Management Corridor and No Surface Occupancy stipulations. Please consult with the NPS on this Amendment.	Developing a land use plan amendment for a Trail Management Corridor Plan is beyond the scope of this proposed transmission line project-level EIS.
101636	(vii)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	7 -- 1-26 DSEIS -- 33-37 -- NPS -- "While the Manual 6280 Inventory and Impacts Analysis covers Project impacts to segments of the Oregon NHT and North Alternate Study Trail on BLM managed land, 36 CFR Part 800 requires the BLM to consider a more comprehensive assessment of Project impacts to NRHP-eligible segments of these two trails on both federal and non-federal lands." Please include a map of segments that are known to be NRHP-eligible and show them in relation to the transmission line segment alternatives.	At this time, only portions of the Trail have been surveyed and have NRHP eligibility determinations. The survey level needed for NEPA is complete, and the Programmatic Agreement provides for completion of the inventory and evaluation after a decision and selection of the route alignments.
101636	(viii)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	8 -- DSEIS Appendix G -- Figure 5.2-5 -- NPS -- According to the National Trails System Act Sec. 12 (1), high potential historic sites are places of historic significance, with visible historic remnants, scenic quality, and relative freedom from intrusion. High potential route segments are "those segments of a trail which would afford high quality recreation experience in a portion of the route having greater than average scenic values or affording an opportunity to vicariously share the experience of the original users of a historic route." The National Park Service asks BLM and the project proponents to avoid direct impacts to intact trail remnants, including ground disturbance, driving on or across ruts or swales, or using them as preparation or storage areas. The National Park Service further asks that any unavoidable crossings of the NHT be aligned perpendicular to the trail, and that wherever feasible, crossings be located in places where the integrity of the historic trail and its setting has already been impaired or destroyed. Please flag or fence trail segments that are in proximity to earth-disturbing activities to help ensure that the trail is not inadvertently impacted by work crews, and have work monitored by an archeologist that meets the Secretary's standards. Please restore and revegetate disturbed areas in the vicinity of the NHT as soon as feasible.	The original Final EIS includes avoidance and minimization measures to limit impacts to NHTs. For example, see VIS-6, VIS-11, and CR-1 thru 8 in Table 2.7-1 of the original Final EIS, which are carried through into the SEIS. These recommendations are also encompassed in the micro-siting and design features and the HPTP framework as standard procedures for resource protection.

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101636	(ix)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	9 -- -- -- NPS -- The NPS recommends that BLM form an agency working group to complete the NHT mitigation framework proposed in the draft Appendix F in the 2013 ROD. Compensatory mitigation measures previously identified for the Juan Bautista de Anza NHT that could be implemented at the Oregon NHT would include: • removing old powerlines and infrastructure • restoring lands crossed by old access roads • acquiring conservation easements and trail segments to enhance protection and public visitation • undertaking proper development of appropriate trail sites for visitor use and enjoyment • implementing a trail monitoring program • engaging tribes in ethnographical work that could focus in part on their perspectives on the emigrant trail, their names for the trail and natural features along it, the oral traditions concerning the trail that they might like to share, etc. • Create a trail-wide compensatory mitigation fund for trail-wide projects that the Superintendent of the Oregon NHT would have discretion to allocate anywhere along the Oregon NHT	These recommendations are encompassed in the HPTP framework as standard mitigation options. Please see the HPTP and Appendix K to this SEIS. Creating a trail-wide mitigation fund for the Oregon Trail is beyond the scope of this project-level analysis.
101636	(x)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	10 – General -- -- NPS -- Due to the NPS role as administrator of the Oregon National Historic Trail, please specifically name the NPS as a member of the working group that will determine site-specific compensatory mitigation measures after project route selection and engineering are completed.	The BLM appreciates NPS willingness to be engaged with the working group and involvement with compensatory mitigation. However, identifying members at this time would be premature. Specific segment mitigation plans will be refined through the HPTP process, after the Class III surveys, in conjunction with the CPs, including NPS.
101636	(xi)	MARTHA LEE,US NATIONAL PARK SERVICE, PACIFIC WEST REGION PWR,LARA ROZZELL	11 -- General -- -- NPS -- Hagerman Fossil Beds National Monument has been in parallel but separate discussions regarding fire operations and alternatives for the placement of the large Gateway West transmission lines. Both sets of discussion involve BLM. During these dual processes, the park has realized that adding transmission lines to the area is likely to increase hazards to air operations required in addressing wildfires in the park. BLM is the agency that responds to all park fires, and it follows park resource protection directives. As of FY 2014, the park directed BLM to control fire with only water drops and very minimal foot crew actions. This is to protect the park's primary resource (fossils) that can easily be damaged by foot traffic, vehicle traffic, and slurry drops (as the chemicals in slurry have been shown to degrade fossils). Construction requirements for any lines near the park should include aerial marker balls along with any other means for air traffic to "spot" such wires even in heavy smoke conditions.	Fire response on NPS lands not crossed by the project is outside the scope of this SEIS. Ongoing parallel interagency discussions and standard construction requirements can be expected to address issues expressed in this comment.
101637	(i)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	We are rating the DSEIS "EC-2", Environmental Concerns- Insufficient Information. We have attached a copy of our rating system. Our primary environmental concerns relate to the project's adverse impacts on the Snake River Birds of Prey National Conservation Area, scenery, historic trails, cultural resources, wetlands, riparian areas, vegetation and wildlife habitat. We are also concerned about potential cumulative effects associated with reclassifying large areas of public lands and facilitating the creation oflarge utility corridors. The insufficient information rating relates to the DSEIS's: • lack of a preliminary environmentally preferable alternative • need for additional information relating to the premise that the No Action Alternative's impacts would be similar to the Action Alternative • deficient proponent-proposed Mitigation and Enhancement Portfolio • insufficient analysis of applying different Environmental Protection Measures across the landscape • minimal status update on Clean Water Act Section 404 coordination with the U.S. Army Corps of Engineers	The BLM appreciates your comments on the DSEIS. Responses to each EPA bullet point appear below.
101637	(ii)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	Agency and Environmentally Preferable Alternatives In our December 2014 scoping comments, we recommended that the BLM identify both the preliminary agency and environmentally preferable alternatives for Segments 8 and 9 in the DSEIS. We appreciate that BLM, consistent with 43 CFR 46.425, has identified two agency Co-Preferred Alternatives. We also understand that, according to Council on Environmental Quality's implementing regulations for the NEPA as well as 43 CFR 46.450, the BLM is required to identify the environmentally preferable altemative(s) at the record of decision stage of the process. Our interest in preliminary identification of the environmentally preferable alternative is that it can help reviewers understand how the various environmental impacts are weighted. We do understand that identifying the environmentally preferable alternative can involve difficult judgements, since environmental values will need to be balanced against	The ROD for the 2013 FEIS identified the No Action as the environmentally preferable alternative for the entire Gateway West project as originally proposed, including Segments 8 and 9. As stated in Chapter 1 of this SEIS, only new information is presented and analyzed in the SEIS, and no new information became available to suggest that another alternative for Segments 8 and 9 should be identified as environmentally preferable. However, in response to your comment we have included the

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			one another. Given the need for deep understanding of the relative importance of different impacts identified in the SEIS, we recommend that the BLM identify the preliminary environmentally preferable altemative(s) in the Final SEIS. We suggest CEQ's ordinary definition for environmentally preferable, "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources."	Environmentally Preferred Alternative in this Final SEIS.
101637	(iii)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	The DSEIS states that, "Under the No Action Alternative, impacts similar to those described below may occur due to new transmission lines that may be built to meet the increasing demand in place of this Project." This statement occurs throughout the DSEIS. We are concerned about this statement because, without sufficient justification or explanation, it has the effect of downplaying the consequences of the BLM's decision to grant, grant with conditions, or deny the Proponent's application. We agree that natural events will continue to occur, and that existing and planned developments will continue within the Analysis Area- such as wind farms, mining, agricultural and other land uses. We also agree that the region would have to tum to other proposals to meet transmission demand. However, it is not consistent with the purpose of the NEP A process to sharply define issues and give decision makers a basis for choice to suggest without specific supporting information or explanation that the No Action Alternative's impacts would be similar to the Action Alternatives' impacts. The DSEIS's analysis focuses on impacts to BLM lands, so, similar impacts would also occur on BLM lands. Such impacts would not occur without approval from the BLM and any subsequent approvals would be subject to their own environmental review processes. We recommend that the SEIS further substantiate the general claim that the No Action Alternative's impacts would be similar to the Action Alternative or remove the claim. To the extent that known or reasonably foreseeable "other proposals" would similarly affect resources analyzed in the EIS, those reasonably foreseeable impacts can be disclosed along with specific supporting information and rationale. We note that natural events are unlikely to lead to similar impacts (e.g., visual), that wind farms and mining are unlikely to occur in the Snake River Birds of Prey National Conservation Area, and - importantly -that other proposals would be subject to their own analyses.	We believe the No Action statement is reasonable in stating "impacts similar to those described below **may** occur due to new transmission lines that **may** be built to meet the increasing demand in place of this Project" [emphasis added]. See SEIS Section 4.2.2.1 Reasonably Foreseeable Actions and Table 4.2-9 in for other approved and proposed similar transmission projects in the Project area.
101637	(iv)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	The DSEIS's information on the Proponent-proposed Mitigation and Enhancement Portfolio and potential effects of the MEP within the Snake River Birds of Prey National Conservation Area is responsive to our scoping recommendation for the SEIS to address environmental impacts with consideration of mitigation enhancement proposals. We appreciate the BLM's substantial analysis of the potential effectiveness of the MEP as proposed.	The BLM appreciates EPA's ongoing engagement in the SEIS process and specifically the analysis of the MEP's effectiveness. The BLM is not planning to implement the MEP; mitigation being considered is discussed in the revised Compensatory Mitigation Framework in Appendix K to this SEIS.
101637	(v)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	• Unknown make-up of the Oversight Committee that selects private inholdings to purchase to compensate for visual impacts (for example). According to the DSEIS, " ... the effectiveness of the Oversight Committee cannot be determined until the individuals and agencies that will be include in the committee are identified."3	The BLM is not planning to implement the MEP. See the revised Mitigation Framework in Appendix K to this SEIS for more information on mitigation currently being considered.
101637	(vi)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	• The MEP's proposal to" ... permanently reduce illegal behaviors ... "4 that may damage resources by funding increased law enforcement within the SRBOP for a period of 10 years. The concern is that 10 years is neither permanent nor lasts the life of the project.	The BLM is not planning to implement the MEP. Planned mitigation would be considered relative to the term of the grant. See the revised Mitigation Framework in Appendix K to this SEIS for more information.
101637	(vii)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	• Exact visitor enhancement programs are not identified, so a determination of the proposal's ability to enhance the objectives and the values for which the SRBOP was established cannot be made.5	Comment noted. The BLM is not planning to implement the MEP. See the revised Mitigation Framework in Appendix K to this document.
101637	(viii)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	• Insufficient information with regard to the MEP's goal to return treated areas to baseline conditions. Natural Resource Conservation Service Ecological Site Descriptions (baseline conditions) have not been defined for 38 percent of Segment 8 and 12 percent of Segment 9.6 Site descriptions for these unidentified areas need to be established in order to determine baseline conditions and define restoration goals.	The BLM is not planning to implement the MEP. The Framework supersedes the MEP. See the revised Mitigation Framework in Appendix K to this SEIS for more information.

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101637	(ix)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	• Insufficient definitions associated with mitigation ratios for habitat restoration. According to the DSEIS, "More information would be required from the Proponents in order to fully assess what areas the Proponents are considering "presently undisturbed ecological sites" or "presently disturbed ecological sites". Without additional information, it is not possible for agencies to fully assess what areas the Proponent would apply their various mitigation ratios to. Based on this, and other factors, BLM concludes that the proposed habitat restoration plan, " ... cannot be considered a complete proposal and the success or validity of the Proponent's plan cannot be accurately assessed. "7	The BLM is not planning to implement the MEP, and mitigation being considered is discussed in the revised Mitigation Framework in Appendix K to this SEIS.
101637	(x)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	In addition to usefully disclosing the above and other deficiencies with the Proponent's MEP, the DSEIS provides associated recommendations. The EPA supports the BLM's concerns about the Proponent Proposed MEP and recommends that the Final SEIS include information detailing the responsiveness of the Proponent's efforts to update the MEP. To the extent that the BLM's mitigation framework is intended to address gaps identified in the MEP, we recommend that the Final SEIS describe specifically how the BLM mitigation framework addresses those gaps.	The BLM is not planning to implement the MEP. See the revised Mitigation Framework in Appendix K to this SEIS for more information. The Framework supersedes the MEP.
101637	(xi)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	In our 2014 December scoping comments we recommended consistent application of Environmental Protection Measures on federal and non-federal lands. Recognizing that BLM cannot require EPMs on non-federal lands, we recommended that the DSEIS analyze the implications for different environmental impacts where EPMs only apply to federal, and/or state lands. The DSEIS does not sufficiently describe or disclose the implications of inconsistent EPM application across ownerships. The EPA cannot fully assess environmental impacts to wetlands, riparian areas, water quality, sensitive plants, wildlife, and vegetation on private lands because the implications of fewer related EPMs on private lands are not disclosed.	The FEIS and the SEIS disclose that the BLM has no authority to require EPMs or other actions on non-federal lands. The FEIS effects analysis considers the impact of not applying some EPMs on non-federal lands. In the DSEIS section 2.6 *Design Features Including MEP and EPMs*, the Project includes the following four Proponent-proposed plans that would compensate for remaining impacts not otherwise avoided or minimized by the EPMs: 1. Proponents' Mitigation and Enhancement Portfolio (MEP) 2. Off-Site Compensatory Mitigation to Offset Project Impacts to Greater Sage-Grouse 3. Final Migratory Bird Habitat Conservation Plan 4. Draft Framework for Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the U.S. (which includes 1.5 acres of wetlands).
101637	(xii)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	We recommend that the Final SEIS include a discussion of the implications for related resources of not applying the following EPMs to state or private lands. • WQA-25: installing culverts with slopes that do not exceed the stream gradient and that maintain streambed material in the culvert help to ensure passage for aquatic organisms. • WET -1: following INFISH buffers, or larger, for avoiding impacts to wetland and riparian areas would help to ensure that impacts to aquatic resources are adequately minimized - a key component of ensuring compliance with Clean Water Act Section 404(b)(J). Section 404 applies across land ownerships. • TESWL I, 4-10, 14 and IS: These measures protect threatened and endangered wildlife species, such as grouse species, yet only apply to federal lands while Segments 8 and 9 of the project would cross between 32.7 and 64.1 miles of private land- as well as many more miles in the other eight segments. We are concerned that the DSEIS, and prior Gateway West EISs, do not sufficiently describe or disclose how the project would lead to impacts on wildlife in different ways on public and private land. • OM-22, OM-26, VEG-8, selected TESPL EPMs, and WILD-10: All of these EPMs present similar analytical insufficiencies. The DSEIS does not address the implications of inconsistent application of these EPMs' protections for sensitive plants and wildlife, noxious weeds, threatened and endangered plants, and snag habitat.	WQA-25, as the EPM states, applies to National Forest Lands. There is no National Forest land in Segments 8 and 9; therefore, it does not apply to any land considered in this SEIS. WET-1, as Appendix M in the FSEIS shows, applies to all lands in Segments 8 and 9 (see the column title: Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9). TESWL I and TESWL 4-10 applies to all lands in Segments 8 and 9 (see Appendix M in the FSEIS). TSEWL-14 and 15, only apply to federal land. The Final SEIS discusses the effect of not implementing this on non-federal lands. OM-22, OM-26, VEG-8, all TESPL EPMs, and WILD-10 apply to all lands in Segments 8 and 9; see Appendix M in the FSEIS. This has been clarified in this Final SEIS.
101637	(xiii)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	Our December 2014 scoping comments included several recommendations relating to Section 404 of the Clean Water Act. We recommended: discussion of who would manage the In-Lieu Fee for aquatic resource compensatory mitigation; rationale for why ILF is an appropriate approach; and a status update on coordination efforts with the U.S. Army Corps of Engineers. Upon further review, we note that FEIS Appendix C-2 is generally responsive to our ftrst two recommendations. According to FEIS Appendix C-2, mitigation banks are unlikely to work for this project, and there are few ILFs in the project area. While these challenges are meaningful, we recognize that the Proponent's proposed framework for aquatic	Compensatory mitigation plans carried through from the 2013 FEIS are included by reference in the SEIS. Appendix K of this FSEIS discusses the Framework for managing compensatory mitigation associated with impacts to resources from Segments 8 and 9 that were not addressed in the 2013 FEIS.

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			resource compensatory mitigation is justified with relevant rationale in Section 5.2 of the FEIS's Appendix C-2. We concur that likelihood of long-term success, and opportunities to provide for increased functions are appropriate considerations.	
101637	(xiv)	US ENVIRONMENTAL PROTECTION AGENCY, REGION 10,CHRISTINE LITTLETON,ERIK PETERSON	With regard to our recommendation for a Corps coordination status update, the DSEIS is minimally responsive because it only includes a statement that coordination has occurred for the FEIS segments and that compensatory mitigation for Segments 8 and 9 " ... would be determined during subsequent coordination efforts with USACE."8 Because the FEIS Appendix C-2 identifies meaningful challenges for adequate compensatory mitigation - lack of existing mitigations banks and ILFs; and, the DSEIS provides a minimal status update, we recommend that the Final SEIS include related updates or - to the extent possible- a fully updated Framework for Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the U.S.	The Corps is a cooperating agency in this analysis. We continue to work with the Corps on 404 issues.
101638	(i)	PAUL NETTLETON	Alternative 1 is the only acceptable alternative for the Gateway West line. No other alternative is acceptable. Alternative 1 routes the line through an area where there is already available infrastructure to support the line construction, there are other lines already in the area, and it would have little or no effect on Birds of Prey possibly even enhancing bird populations by giving them additional places to perch and hunt. There would be minimal disturbance to the land because of the roads already existing in the area. Alternative 1 has been endorsed by the Owyhee County Commission, the Owyhee County Natural Resources Committee, the Owyhee County Local Sage Grouse Working Group, the Governor's Task Force on Gateway West, the BLM RAC and many private organizations that deal with Federally managed lands. Ranchers, farmers, environmentalists, recreationist, political leaders, and ordinary citisens are all in agreement that this is the best alternative.	Your comments on the benefits of Alternative 1 are noted.
101638	(ii)	PAUL NETTLETON	Alternatives 2 and 5, your "co-preferred" alternatives are completely unacceptable. Either one would cause massive disturbance to pristine land, private farmland, historic properties, and would ruin the view of the Owyhee Mountains from Highway 78 through Owyhee County. These routes would run dangerously close to sensitive Sage Grouse habitat giving predators many places to perch and hunt this threatened species. Both alternatives 2 and 5 would cut through our historic ranch on Sinker Creek in Owyhee County established in 1865, and widely recognised as the oldest ranch in Idaho that is still in the same family. Both would severely hinder our farming and ranching operations and handicap our efforts to improve the land while preserving our heritage. Make no mistake, if either of these alternatives are adopted they would be tied up in court for many years by the groups mentioned above and others. Alternative 1 was a consenses reached by all interested parties, parties who now feel betrayed by the preference of essentially the same old routes repeatedly rejected by the involved parties that spent more than a year and countless man hours hammering out an agreement. That agreement is Alternative 1 which mitigates the concerns of all and was signed off by local BLM. Maybe the Washington D.C. Bureaucracy didn't get the word. I urge BLM to accept Alternative 1 and avoid further local outrage.	You opposition to Alternatives 2 and 5 is noted. The SEIS discloses the impacts that that Project would have to lands, agriculture, sage-grouse, and historic properties.
101639	(i)	WILLIAM FOWKES	The protections that are built into the National Conservation Area mandates will be similarly honored even though promotors of the revised proposed route do not want this to be so. Either promoters' of this revised route get an industrial 500kv high voltage line and 180' tower corridor and associated high impacts running through the Morley Nelson Snake River Birds of Prey National Conservation Area, or the NCA remains as in spirit and law as it was intended. The two uses are clearly incompatible. Very simply, the BLM will do its' job and deny any incompatible easement within its boundaries, or be forced to do so by Federal Court action. With this, I recommend that if this project is to be built (and I have my doubts that it should be, as this project emphasizes transmission of dirty coal electrical energy production that has fallen out of favor since its' initial inception years ago) I will support the BLM's co-preferred alternative 5 (five).	Your preference for Alternative 5 is noted.
101639	(ii)	WILLIAM FOWKES	Transmission line development causes serious impacts, including direct damage to wildlands, wildlife habitat and cultural resources; interference with scenic vistas; habitat fragmentation; and others. Consequently, transmission lines are generally incompatible with management of the Conservation Lands absent a specific showing of how such a project would "protect, maintain, and enhance" the raptors, raptor habitat and the other purposes for which the NCA was designated. The BLM has not provided analyses that demonstrate this standard has been met for the Gateway West line. Unless BLM	The DSEIS does not claim that it has demonstrated that the legal requirement for the NCA have been met. The determination that a route through the NCA would be/would not be consistent with the all laws, regulations, and policies would be made by the authorized officer in a ROD.

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			can demonstrate how these transmissions lines would be good for the raptors and overall NCA values, I cannot support the lines going through the SRBOPNCA.	
101640	(i)	US FISH AND WILDLIFE SERVICE, CHEYENNE	1. Conservation Objectives Team Report and Mitigation Framework Consistency The Greater Sage-grouse Conservation Objectives Team Report, or COT Report, and the supplemental Greater Sage-grouse Range-Wide Mitigation Framework (Mitigation Framework) recommend range-wide conservation and mitigation objectives for the sage-grouse. As one component of our evaluation of the status of the sage-grouse under the ESA, we used both the COT Report and the Mitigation Framework to guide our review of projects, actions, and plans that may influence that species' status. As discussed in our letter concerning the administrative draft supplemental environmental impact statement (aDSEIS), version 2, dated February 8, 2016, we completed a review of the co-preferred alternatives for segments 8 and 9 using the Checklist and identified areas in which GWW was fully, partially, or not in compliance with the objectives outlined by the COT Report and Mitigation Framework (see attachment). We recommended that BLM disclose and discuss within the DSEIS any concerns and recommendations that were identified as a result of this evaluation, and make this recommendation now for the final supplemental environmental impact statement (FSEIS).	The BLM's review of the Project conforms to the USFWS's COT report check-list. For example, both identify the lack of mitigation for indirect impacts to sage-grouse as an issue, and require that the applicant provide this mitigation. We have not identified any component of the COT report check-list that raises an issue that is not already addressed or raised in the SEIS.
101640	(ii)	US FISH AND WILDLIFE SERVICE, CHEYENNE	2. Assessing Indirect Impacts to Sage-Grouse In a memo dated June 11, 2015, the Service and BLM jointly provided Rocky Mountain Power and Idaho Power (hereafter referred to jointly as Companies) with a document entitled Assessing Indirect Effects of Transmission Lines on Greater Sage-Grouse for the Gateway West Interstate Transmission Line Project, June 4, 2015. We acknowledge and appreciate the Companies' commitment to incorporate the information and recommendations from this document into the indirect impact assessment. On June 26, 2015, the Service provided comments on the DSEIS (version 1) for segments 8 and 9 to BLM, and on February 8, 2016, the Service provided comments on the aDSEIS (version 2) including recommendations regarding the need to address impacts to sage-grouse. Following completion of an analysis of indirect effects in accordance with the June 16, 2015, and February 8, 2016, guidance and recommendations, the Service will be available to work collaboratively with the Companies on a compensatory mitigation plan that appropriately offsets indirect effects on sage-grouse from segments 8 and 9 of the GWW Project.	The SEIS already identifies indirect impacts to sage-grouse as an issue, and qualitatively discloses the potential impacts. The SEIS further requires that the Applicant develop mitigation to address this indirect impact, and recommends that the applicant use the white-paper (mentioned in this comment) to quantify their mitigation.
101640	(iii)	US FISH AND WILDLIFE SERVICE, CHEYENNE	3. Section 7 Consultation/Conference Under section 7 of the ESA, the Service published a final Biological Opinion (BO) for the BLM's proposed GWW Project, as well as a Conference Opinion (CO) for slickspot peppergrass, on September 12, 2013. The DSEIS for the proposed GWW Project modifies the location of Segments 8 and 9 of the original proposal. When a project is modified from the original action addressed through section 7 consultation or conference, it is the responsibility of the federal action agency to determine whether their original effects determinations remain valid. As provided in 50 CFR §402.16, reinitiation of formal consultation is required under various circumstances. The Service recommends that the BLM examine effects determinations for proposed and listed species and critical habitat to determine whether, with the updated locations of Segments 8 and 9, that the effects determinations of the BLM' s original 2013 Biological Assessment and the conclusions of Service's 2013 BO/CO remain valid. We further recommend that the FSEIS describe these effects analyses for the updated Segments 8 and 9 in relation to the original 2013 effects analyses, and whether the existing 2013 section 7 consultation /conference continues to adequately address effects that may occur from the new preferred alternative routes on proposed or listed species and their critical habitat. The Service anticipates that these updated effects analyses will be finalized once public comments on this draft SEIS have been used to inform the final proposed action, but prior to the signing of the Record of Decision (ROD) for the GWW Project FSEIS. The Service is available to provide technical assistance to the BLM regarding use of the 2013 BO/CO to address the effects of the final GWW updated Segments 8 and 9 preferred alternative on proposed and listed species and their critical habitat. We look forward to further coordination with BLM to ensure section 7 requirements continue to be adequately addressed for the GWW Project.	Because slickspot peppergrass was proposed for listing at the time the DSEIS was prepared, BLM policy required treating it in the SEIS the same as a listed species when evaluating impacts. On August 17, 2016, the USFWS reinstated the status of slickspot peppergrass as threatened under the Endangered Species Act (ESA), effective September 16, 2016 (81 *Federal Register* 55058–55084). The SEIS provides an updated effects analysis for Segments 8 and 9 related to slickspot peppergrass (see Section 3.7). The BLM has provided the USFWS with an ESA compliance memorandum that provides supplemental information on the changes that have occurred to the Project since the publication of the FEIS, as well as to the applicable impact assessment and effects determination found in the original Biological Assessment (BA). The BLM has requested that the USFWS accept and acknowledge the supplemental information provided in the ESA Compliance Memorandum and acknowledge the determinations and conservation measures in the original BA as remaining valid and below the threshold for re-initiation of consultation.

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101640	(iv)	US FISH AND WILDLIFE SERVICE, CHEYENNE	4. Slickspot Peppergrass The Service recommends that the BLM require mitigation for the loss of slickspot peppergrass element occurrences (EO) and proposed critical habitat acreages associated with the GWW Project. Because slickspot microsites most likely cannot be replaced, we recommend that the loss of EOs and critical habitat be addressed at a higher habitat replacement ratio than the 1: 1 ratio (particularly if slickspot microsites may be lost) similar to mitigation described in the DSEIS, Appendix K (see page K-10) for restoration of raptor habitat on the Morley Nelson Snake River Birds of Prey National Conservation Area. The Service's Idaho Fish and Wildlife Office is available to provide technical assistance to the BLM regarding mitigation for loss of slickspot peppergrass EO and critical habitat acreages associated with the GWW Project.	Mitigation ratios will depend on the locations of the impacts to slickspot peppergrass (if any). Impacts to slickspot peppergrass within the NCA will be mitigated at ratios greater than 1:1. However, the intent is to avoid impacts to slickspot peppergrass during project design and additional micro-siting, see the TESPL-4. Also note that Alternative 5 (i.e., the BLM Preferred Alternative) would not cross slickspot peppergrass habitat. Future discussions regarding compensatory mitigation will take place between the BLM, the Companies and other agencies with technical expertise, and preparation of a complete Compensatory Mitigation Plan will occur after the ROD but before issuance of the Notice To Proceed.
101640	(v)	US FISH AND WILDLIFE SERVICE, CHEYENNE	5. Assessing Impacts to Migratory Birds The DSEIS addresses potential impacts to migratory birds and the Morley Nelson Snake River Birds of Prey National Conservation Area in section 4.4.12.3, and discusses mitigation for impacts to these resources in section 3.10.2.6 and 3.11.2.6. As stated in our letter dated February 8, 2016, the Service recommends that the impacts to forested and woodland habitats be quantified and provided in the qualitative analysis given on 4.4.12.3. The Service looks forward to continued coordination with the BLM and the Companies in finalizing the Migratory Bird Habitat Mitigation Plan to include analysis of impacts and mitigation for GWW Project segments 8 and 9.	The impacts to forested and woodland habitats are currently assessed and the quantitative values provided in the SEIS (see Sections 3.6, 3.10, and 3.11). Chapter 4, Section 4.4.12.3 currently references this quantitative assessment for forested and woodland habitats. As stated in the Final Migratory Bird Habitat Mitigation Plan (MBHMP), the Companies will follow the same basic methods for identifying the acres of proposed compensatory mitigation for Segments 5 through 10 that were described in the MBHMP for Segments 1 through 4. The Companies will supplement the MBHMP with the proposed mitigation acres for Segments 5 through 10 once the information is available.
101640	(vi)	US FISH AND WILDLIFE SERVICE, CHEYENNE	General Comment Chapter 3 of the DSEIS states that the western distinct population segment of yellow-billed cuckoo (Coccyzus americanus) is currently listed as threatened under the ESA. However, there appears to be an editorial oversight in Chapter 4- Cumulative Effects of the DSEIS as this section refers to the yellow-billed cuckoo as a candidate species (see page 4-47). We recommend that page 4-4 7 in Chapter 4 of the FSEIS also be updated to also reflect the current status of the yellow-billed cuckoo under the ESA.	Change made
101641	(i)	CINDY ADAMS,WENDY AMEK,ANN BARNES,MICHAEL BETTS,ANGEL BEUTLER,AARON BEUTLER,AMY BROWN,TINA BURTS,LINDA DAVIS,MIKE DAVIS,EILEEN EARNIGH,ELAINE ENDSLEY,JOYCE FALER,MARYANN FLOYD,LARRY GEREN,TOM HARBISON,LEONA HILL,RICH HOWARD,SANDRA J HURTLY,CRAIG JACKSON,MARGUERITE JANES,REGINA JONES,MARY KAVANAGH,RUTH KLINKENBORG,BLANCA LEON,ANNETTE LYNOTT,SUZANNE B MANN,JENNIFER MAVENCAMP,ROBIN MCGHEE,DENNIS MCKENZIE,KATHY MCKENZIE,TAMARA MCKNIGHT,VAUGHN MCKNIGHT,GARY MEDE,ROBERT MESSNER,ROSELLA MYERS,MARIAH NEAL,GERI OMOHUNDRO,MICHELE ORTON,ROBERT PETERSEN,NATASHA ROWLEY,CARY SHAFFER,MARK STASZ,CLIFF STOCKTON,LEANNE THOMPSON,JEANNE TRONCIN,DONALD TRONCIN,BEVERLY AND EDWARD WICKHAM,MELISSA WISE	We are in support of the route alternatives in the following order: Alternative 1, Alternative 2 and Alternative 3; we are opposed to Alternative 4, Alternative 5, Alternative 6 and Alternative 7.	Your preference for Alternatives 1, 2, and 3 in that order is noted; and your objections to Alternatives 4, 5, 6, and 7 are noted.

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101641	(ii)	[same as above]	Alternatives 1 and 2: • have more miles within an existing transmission corridor then Preferred Alternative 5, a goal of the BLM; and • involve less Sage-Grouse PPH Habitat than Preferred Alternative 5; and • involve SRBOP power corridors that are not in proximity to any town populations, homes, parks, monuments or public recreation sites, providing enhanced nesting, perching and roosting sites for raptors. • Revised Segment 8, Alternatives 1 and 2: • have no issues with proximity/encroachment to towns or cities along its route; • can minimize the disturbance footprint while meeting the RMP to " ... not adversely affect raptor populations or habitat," by paralleling the new lines with the existing power lines located in the SRBOP, using the reduced mandatory minimum separation distance.	Your comments on the benefits of Alternatives 1 and 2 are noted.
101641	(iii)	[same as above]	Revised Segment 8, Alternative 1, 2 and 3: • do not interfere with any State or National Parks, scenic byways or WLM areas located in the Middle Snake River reach. Preferred Alternative 2: • is the shortest analyzed route in the Supplemental EIS, thereby being the most cost efficient; • has less acres of construction and operations disturbance then Preferred Alternative 5, minimizing long term footprints to the areas involved.	Your comments on the benefits of Alternatives 1, 2, and 3 are noted.
101642	(i)	SUZANNE JENSEN	• The Idaho State Park and The National Park Service are both located in the Valley, major power lines take away from the scenic beauty and diminish the experience of visiting our park system.	Comment noted
101642	(ii)	SUZANNE JENSEN	• A prominent asset in the Valley is having the Thousand Springs Scenic Byway pass through it, there are 11 priority resource sites located on the 67 miles of the Byway and 6 of those sites are located in the Hagerman Valley. The proposed transmission lines would cross this stretch of highway.	Comment noted
101642	(iii)	SUZANNE JENSEN	• We favor Revised Segment 8, Alternative 1. This is the proposed route as designed and developed by the Proponents. It has been approved by Idaho Power, Rocky Mountain Power and the office of the Governor.	Your preference for Alternative 1 is noted
101643	(i)	HAGERMAN VALLEY CHAMBER OF COMMERCE,BONNY ROSS	• We are in favor of Revised Segment 8, Alternative 1, as this was the route that was developed and favored by the Proponents; Idaho Power, Rocky Mountain Power and the Office of the Governor. o This route is not in conflict with the plan that was developed and approved by BLM for the Thousand Springs Scenic Byway pass; supporting the Hagerman Valley as a recreational destination for hunting, fishing and water sports. o In addition, this route would not diminish the scenic beauty nor the experience of visiting the Idaho State Park and National Park Services; both of which have multiple visitation sites within the Hagerman Valley. These items are critical to the economic stability of the Hagerman Valley area. Bringing in another major power transmission system would take away from the scenic byway experience and have a negative impact on the local economy and thus the members of the community.	Your comments on the benefits of Alternative 1 are noted.
101644	(i)	GOODING COUNTY, BOARD OF COMMISSIONERS	• The Idaho State Park and National Park Service both are prominent in the Valley; again major power lines take away from the scenic beauty that is found in our state and federal park systems.	Visual impacts are analyzed in Section 3.2 of the SEIS and are one factor the BLM will consider when formulating a decision for the Project.
101644	(ii)	GOODING COUNTY, BOARD OF COMMISSIONERS	• In 1991 the U.S. Forest Service, Bureau of Land Management and the State of Idaho combined specific scenic routes under one umbrella; Thousand Springs Scenic Byway. The Thousand Springs Byway is 67 miles in length with 11 priority resource sites. Five of those sites are located in the Hagerman Valley. The proposed transmission lines would cross this scenic stretch of highway.	The effects on scenery in the Hagerman area are discussed in Section 3.2. Additional KOPs and simulations have been added to the Final SEIS at the request of the NPS.
101644	(iii)	GOODING COUNTY, BOARD OF COMMISSIONERS	We are in favor of Alternative 1.	Your preference for Alternative 1 is noted
101645	(i)	CITY OF HAGERMAN	• Our area is well known for its recreational attractions and more power lines take away from that perception.	Impacts to recreation resources are analyzed in Section 3.17 of the SEIS. These impacts are one factor the BLM will consider when formulating a decision for the project.
101645	(ii)	CITY OF HAGERMAN	• Crossing over Highway 30 is particularly an issue as that is designated as part of the Highway 30 Scenic By-way.	Visual impacts are analyzed in Section 3.2 of the SEIS and are one factor the BLM will consider when formulating a decision for the project.

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101645	(iii)	CITY OF HAGERMAN	• Because the Valley is small, negative factors create a greater impact than would occur in larger areas.	Analysis in the SEIS is at both local and landscape scales. Impacts to local communities are addressed in Section 3.4. Impacts to Visual Resources are addressed in Section 3.2, and Cumulative Impacts are addressed in Chapter 4.
101645	(iv)	CITY OF HAGERMAN	• The Hagerman economy is still struggling and it has been difficult to attract and sustain businesses here.	Impacts to the local communities and economies are addressed in Section 3.4 of the SEIS and are among the factors the BLM will consider when formulating a decision for the Project.
101645	(v)	CITY OF HAGERMAN	We would favor Alternative 1, in agreement with Idaho Power, Rocky Mountain Power and the Office of the Governor.	Your preference for Alternative 1 is noted
101646	(i)	DAVID CASE,JIM TIBBS,RICK YZAGUIRRE	We would, however, hope that the BLM will take seriously the desire of not just Idaho Power, Kuna and the Ada County Board of Commissioners, but also the Boise District RAC, in recommending Alternative 1 for Segments 8 and 9 be routed along the existing Baja Road, with minimal disruption anticipated to the Birds of Prey National Conservation Area north of the Snake River. Other alternatives, routing the new line on the south side of the Snake River, would threaten Sage Grouse nesting areas, have an adverse economic impact on farmers in Owyhee County, and require the establishment of an entirely new corridor (grading and paving of an access road for ongoing maintenance).	Your preference for Alternative 1 is noted. The SEIS discloses the impacts that would occur to various resources as a result of the alternatives considered. The BLM will take these into consideration while developing their ROD.
101646	(ii)	DAVID CASE,JIM TIBBS,RICK YZAGUIRRE	As stated in our letter of April 2014, Policy 7.3-3 of the Ada County Comprehensive Plan calls for multiple uses of utility corridors by utility providers. Southern alternatives are not consistent with our Comp Plan, and would also seem to create needless financial cost, as well as the potential of significant disruption to the land and its inherent wildlife, during the construction period and well beyond.	The SEIS discloses the impacts that would occur to various resources as a result of the alternatives considered. The BLM will take these into consideration while developing their ROD.
101647	(i)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	We have, in good faith, provided comments at every stage of this lengthy process. We have on several different occasions believed that we had reached agreement with BLM on a route that would place the bulk of this transmission project where it belongs, on federal lands, rather than on the private lands in our county. Despite our good faith efforts, we have repeatedly had our locally developed and collaboratively reached agreements breached by higher authority in BLM.	The BLM acknowledges and appreciates the ongoing, good-faith involvement of Owyhee County commissioners and residents. As directed in the 2013 ROD, the BLM “pursue[d]” consensus on routing Segments 8 and 9 by engaging and collaborating with the County and local residents and landowners through the RAC and then through the multiple opportunities for involvement in the NEPA process, with the hope that this would lead to consensus. We greatly appreciate the commitments of time and expertise this represents and share the County’s desire for consensus. However, the BLM must balance this desire with its obligations under regulations and laws, including the statute that established the SRBOP. In addition, only a federal officer (such as the BLM State Director, the BLM National Director, or the Secretary of the Interior) is authorized to make decisions on BLM-managed lands and only after completion of the NEPA process.
	(ii)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	Our previous comments (Enclosures I and 2) have addressed the impacts to our private lands. We have also previously addressed BLM's failure to comply with Section 368 of the 2005 Energy Act which required that the energy corridors for projects such as this be located on federal lands. The Act specified that management plans for those lands would be amended, if necessary, to accommodate the energy corridors. In the February 2006 "Summary of Public Scoping Comments for the Programmatic Environmental Impact Statement, Designation of Energy Corridors on Federal Land in the II Western States (DOE/EIS-0368" the document states the 2005 Energy Act as the authority by which the EIS is being undertaken, yet ignores the requirement to place the corridors on federal lands.	The siting of energy corridors under authority of Section 368 of the 2005 Energy Policy Act is an issue outside the scope of this project-level SEIS.

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101647	(iii)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	When BLM released the decision on the project, absent Sections 8 and 9, the BLM indicated that delay on the release of the Section 8 and 9 Decision was to allow for further analysis with local groups. Our County and the Boise District Resource Advisory Committee (RAC) took that statement in good faith. The RAC established a Subcommittee tasked to evaluate possible routes and to evaluate them on a sound basis so as to allow for a RAC recommendation to the BLM. The RAC Subcommittee expended considerable time and energy in the effort. See enclosed RAC Subcommittee Meeting Minutes of December 5th and 17th of 2013 (Enclosures 3 and 4 respectively). The RAC Subcommittee rendered a formal report to BLM on May 30, 2014 recommending the route through the NCA. (a portion enclosed at Enclosure 5) The Subcommittee and the full RAC supported the route proposed by the Subcommittee The RAC Subcommittee membership included environmental, recreational, livestock, academic (PHD Economist), state and local government, and others, including a retired USGS Raptor Specialist. The retired raptor specialist has vast expertise and experience with the NCA and with the impact of powerlines on the purposes and intent of the NCA. The Subcommittee found the most appropriate route was through the NCA. After the most recent Draft SEIS was released, the RAC provided an April 15, 2016 written comment to BLM (Enclosure 6) which expressed their disappointment in the BLM's selection of routes. The following is from the opening paragraph of that document: "The Boise District Resource Advisory Council (RAC) is disappointed that the BLM did not choose the routes that were recommended by the RAC Gateway West subcommittee and unanimously endorsed by the full RAC (Alternative I) as its preferred alternative in the draft Supplemental EIS for segments 8 and 9 of the Gateway West Transmission Line Project. We also are disappointed that the BLM chose two preferred alternatives that the RAC analysis found would have unacceptable adverse impacts on resources and communities in Owyhee County.	The BLM sincerely appreciates the RAC's efforts to evaluate potential impacts from Segments 8 and 9 and consider the issues identified in the ROD, as well as the advice contained in the two RAC reports. The SEIS fully considers those reports along with the other input received during scoping for the SEIS. The original direction to the RAC was to "determine whether there is new information and/or modifications to the alternatives analyzed in the Final EIS … that the BLM should consider that could resolve … siting issues identified in the ROD," and during several subcommittee meetings, BLM-Idaho leadership and agency project managers specifically advised that any recommendations or rankings of route alignments by the subcommittee would not constitute NEPA analysis or a final BLM decision on the pending right-of-way application for Segments 8 and 9. The RAC's recommended routes were not the consensus of the subcommittee, as is described in the route report.
	(iv)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Governor of Idaho has repeatedly expressed his desires that the route go as proposed by the county and the RAC so as to avoid impacts to private property. He has expressed that again in an April 21, 2016 letter to the Idaho Delegation. (Enclosure7) The Governor's letter summarizes accurately what is wrong about the BLM's selection of co-preferred alternatives: "The BLM's co-preferred alternatives are inconsistent with the directives of the November 2013 ROD and are routes that the RAC analysis found to have unacceptable adverse impacts on resources and communities in Owyhee County. Alternatives 2 and 5 run through extensive amounts of private land and/or disrupt Owyhee Front greenfield areas while possible failing to meet the intended transmission reliability concerns of the proponent utilities. By issuing these co-preferred alternatives, the BLM failed to identify a consensus agreement on the transmission alignment for these routes and therefore failed to meet the intended purpose of the supplemental environmental impact statement process.	The majority of Alternatives 2 and 5 would be located on public lands in Owyhee County. Alternative 1 crosses more private land than Alternative 5. As directed in the 2013 ROD, the BLM "pursue[d]" consensus on routing Segments 8 and 9 by engaging the State and local community through the RAC and then through the multiple opportunities for involvement in the NEPA process, which is not complete until the BLM issues a decision, with the hope that this would lead to consensus. The BLM must balance the desire for consensus with its obligations under all regulations and laws. Information in the DSEIS (Sec. 2.3.4) and in the Notice of Availability provide the rationale for selecting the DSEIS Co-Preferred Alternatives. The RAC's recommended routes were not the consensus of the subcommittee, as is described in the route report. The original direction to the RAC was to "determine whether there is new information and/or modifications to the alternatives analyzed in the Final EIS … that the BLM should consider that could resolve … siting issues identified in the ROD," and during several subcommittee meetings, BLM-Idaho leadership and agency project managers specifically advised that any recommendations or rankings of route alignments by the subcommittee would not constitute NEPA analysis. In addition, CEQ regulations provide for the selection of co-preferred alternatives.

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	(v)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	BLM's analysis in the Draft is flawed in numerous areas. For example, the analysis of impacts for various alternatives misrepresents the number of miles of roads needed for the project. Chapter 2-12 indicates mileages for Segment 9 as Revised Proposed Route 165.3, 9K 176.9, FEIS Proposed 9 162.2. The Draft does not address the number of miles of new roads required and ignores the existing road net in the NCA (Enclosed Baja Road Photo, Enclosure 8).	Miles of new roads for each of the alternatives are listed in Section 3.19 of the SEIS.
	(vi)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	BLM indicates that current regulations prohibit siting the route in the NCA. There are several issues to be raised with that concept. The rules cited by BLM were not in existence at the time this process began.	The SEIS does not assert that regulations or policy “prohibit” siting the segments in the NCA.
	(vii)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	Section 368 of the Energy Act of2005 indicated that the lines would be located on federal lands and that management plans for those lands would, if necessary, be modified to allow the siting. Section 368 did not exempt the NCA or other NLS lands from this requirement.	Implementation of Section 368 of the Energy Policy Act of 2005 is outside the scope of this project-level SEIS.
101647	(viii)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	the BLM"s preferred alternatives does route a portion of the proposed line through a portion of the NCA, so the precedent which BLM seeks to avoid, is already established by BLM's selected routing.	Issues associated with potentially routing the segments through the NCA are discussed in detail in a separate section added to Chapter 3 of the FSEIS that discusses NCA Values (Section 3.24).
101647	(ix)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Draft does not address or assess the impact of the creation of the new roads required by the co-preferred alternatives vs the use of the existing road net in the NCA.	Miles of new roads for each of the alternatives are listed in Section 3.19 of the SEIS. All disturbance, including new road construction, is accounted for in the disturbance calculation. The same is true for road widening, tower construction sites, equipment yards, fly yards, cable-pulling sites, etc.
101647	(x)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Draft ignores the existing studies regarding the beneficial impacts of transmission lines for raptors in the NCA.	The 2013 FEIS and the SEIS considered research on the benefits to raptors in NCA (see Chapters 3 and 7). The relative benefits and negative impacts to raptor populations in the NCA are one factor analyzed in the SEIS but are not the only resource impact the BLM must consider.
101647	(xi)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Draft ignores or dismisses the June 4, 20 I5 BLM and US Fish and Wildlife Service white paper "Assessing indirect effects of Transmission Lines on Greater Sage-Grouse for the Gateway West Interstate Transmission Line Project" (enclosure 9)	The white paper was reviewed and considered.
101647	(xii)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Draft fails to adequately address the economic impact to agricultural lands of the proposed routes across the private lands in Owyhee County. Data in the document is outdated in terms of types of irrigation delivery systems analyzed. Irrigation in the area has been converted to pivot systems which significantly increases the cost and, therefore, the impact of the proposed actions.	The 2013 FEIS analyzes effects to farms and agricultural operations in detail (Section 3.18). The SEIS includes analysis of new information where appropriate. However, it does not repeat analysis already presented in the 2013 FEIS that is still valid and not in need of revision in light of new information. The BLM did not receive any additional data during the public comment period that would change the existing analyses of agricultural impacts already presented in the Final EIS or the Draft SEIS.
101647	(xiii)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Draft fails to analyze the impact to farm ground crop production that will result from the construction of the line, such as soil compaction, interruption of planting cycles, disturbance of planted crops (winter wheat for example) and interruption or termination of aerial crop spraying. It also fails to address the loss of future value of those lands to other (development) uses.	See the response to your previous comment.
101647	(xiv)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Draft fails to address and analyze the impacts to historical preservation. The co-preferred routes significantly impact the oldest family owned ranch in Idaho. (See Enclosures 10 and 11 of Farm Bureau Quarterly and Idaho Magazine respectively). The Draft fails to address and analyze the impact to Our Lady, Queen of Heaven Church in Oreana, which is listed on the National Register of Historic Places (See Enclosure 12).	The BLM must consider impacts to cultural resources, historic properties and national trails both inside and outside of the NCA and these impacts were analyzed in the FSEIS and the FEIS. Impacts to historic properties are addressed in Section 3.3 of the SEIS. There is no provision in NEPA regulations or policy guidance for giving special consideration to privately held properties that are not listed under federal or state historic preservation laws. Effects to private property values are

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				analyzed in both the 2013 Final EIS and this SEIS (Section 3.4). Our Lady Queen of Heaven Church is located outside of the Area of Potential Effect (study corridor) for impacts to cultural resources and historic properties, as defined in the National Historic Preservation Act.
101647	(xv)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The Draft fails to address and analyze the adverse impacts of the line on the private lands from the perspective of Social and Economic Justice. As noted in census data, Owyhee County is a poor, rural county. In that only approximately 20 percent of the lands in our county are privately owned, the impact to those private lands will be significantly greater due to our low income economy. Placing the line on federal lands proximate to those private lands will also have a devaluing effect on the private lands.	Section 3.5 of the 2013 Final EIS discusses Environmental Justice (EJ) issues associated with all 10 segments of the project. This section of the Final EIS notes your comment from that time regarding potential EJ issues in Owyhee County. Section 3.5.2.3 of the SEIS repeats EJ analysis for Segments 8 and 9, using CEQ guidelines and appropriate data. We recognize that the county does not believe that the definition adequately covers its social justice concerns. The BLM did not receive any additional data during the public comment period that would change the existing analyses of EJ impacts already presented in the Final EIS or the Draft SEIS.
101647	(xvi)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	BLM's selection of co-preferred alternative ignores the fact that BLM lacks authority to determine siting of the line on any private lands within our county. Land uses, such as the proposed line, are addressed in Owyhee County land use plans and zoning ordinances. The county has published such plans and has authority as to siting of lines. Project approval for any actions on private lands will have to be accomplished through the Owyhee County Planning and Zoning process on a parcel by parcel basis. Our ordinances require that any application must be submitted either by the owner of record or with a notarized statement from the owner of record indicating they approve of the proposed use. The vast majority of the land owners affected by BLM's co-preferred alternative have provided written notice that they will not support such an application on their land and will not be willing sellers of an easement for such use. (See Enclosure 13). Those seventy-six (76) documents should be considered also as individual comments by those landowners.	The 2013 FEIS and this SEIS both acknowledge that the BLM has no authority to approve or prohibit transmission lines, or any other project, on non-federal lands. County plans are considered in the 2013 FEIS, and the SEIS notes (Section 1.4.3) the authorities for authorizing ROWs on private land under Idaho law.
101647	(xvii)	OWYHEE COUNTY, BOARD OF COMMISSIONERS,KELLY ABERASTURI,JERRY HOAGLAND,JOE MERRICK	The appropriate action on this Draft is to select the alternative proposed by the RAC that has been supported by the County and the State.	Consensus was and remains a BLM goal for this project. However, the BLM must balance this desire with its obligations to all applicable laws and regulations, and land management policies at the National level. The BLM appreciates the County's perspective on impacts to affected citizens, and shares their interest in considering these factors to reach a decision on Segments 8 and 9.
101648	(i)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The National Audubon Society supports properly sited renewable energy. But as the country ramps up its renewable energy portfolio, properly sited transmission lines to carry (properly sited) renewable energy, often generated in remote locations, to population centers is just as key. Our work to promote properly sited transmission corridors helps to ensure that Important Bird Areas and other habitats critical for the survival of bird populations and migratory species are protected.	Comment noted.
101648	(ii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The fact that a large number of BLM RMPs across the project area have to be amended to accommodate Gateway is a red light for PFA. As we have stated before, these amendments do nothing to protect or enhance. They allow the of sacrifice important, irreplaceable, and sensitive areas; including important wildlife habitat and visual resources, etc., by reducing or removing protective restrictions to allow the project.	Comment noted.

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101648	(iii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Project proponents are aware of this too. "The amendment(s) allowing a new Right Of Way(ROW) outside the existing corridors could result in cumulative impacts from future development, such as additional impacts on visual, wildlife, plant, cultural, and vegetation resources" Final Environmental Impact Statement (FEIS) "In some cases, large areas of public lands would be reclassified, possibly allowing for additional projects without additional plan amendments. These impacts to land use planning goal would be considerable, particularly when taken together with other transmission lines request similar consideration, which if granted along the same route would create a large utility corridor. " (SEIS)	This statement does not come from the project proponents, it comes from the EIS, which is being prepared by the BLM, not the Proponents.
101648	(iv)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	We believe amending RMPs for segments 8 & 9 will set a precedent for projects in the future. The very thing the older, more thoughtful, and protective RMPs protect. "If the amendments associated with the Proposed Route is approved, other transmission lines proposed for this general area could choose to follow this same route; however, any additional transmission lines will go through the amendment process for this RMP direction because the amendment only applies to the proposed Project." (FEIS)	Comment noted. Chapter 4 considers the cumulative effects of approving the amendments.
101648	(v)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The proponents objectives "which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs" FEIS Section 1.3, can be done within the confines of existing energy corridors to increase efficiency and reliability. With the Exception of wind energy which is essentially costly and if sited in the wrong area, deadly to wildlife. As referenced "In a Rational Look at Energy" by Kimball Rasmussen, President and CEO of Deseret Power. "The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible." (FEIS)	Comment noted. Following existing transmission lines or utility corridors is not without serious impacts. The analysis considers these impacts.
101648	(vi)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Maps of the project are vague and confusing. These are only general maps that don't show exactly where the lines within segments 8 and 9 will be sited. In talking to BLM representatives and others, we are not alone in this.	It is correct that the lines on these maps do not show the exact location of the proposed lines. As stated in both the EIS and this SEIS, the lines are based on indicative design. The final locations will not be known until a route is selected, surveyed, and designed. The intent is to show a reasonable representation of the location.
101648	(vii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Construction of this transmission line across Hagerman Valley would be detrimental to large numbers of waterfowl and other migrating birds, including the Trumpeter Swan (BLM: Regional/State imperiled, Type 3) using this flyway, the Hagerman Wildlife Refuge, the Snake River, as well as the surrounding valley. This is a unique area because of the large bodies of water that don't freeze during the winter months thus making it very attractive to waterfowl and other migratory birds.	Effects to waterfowl are considered in Section 3.10.
101648	(viii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	PFA members enjoy and make extensive use of the Hagerman WMA because it provides a unique opportunity to view the many and varied bird species that frequent the area including Bald Eagles, Trumpeter and Tundra Swans, and numerous species of other waterfowl, not only during the winter, but throughout the entire year. PF A members as well as many others utilize the WMA for birding, hiking, study, and other recreational and aesthetic pursuits. PFA has taken an active interest in the WMA. As part of the nationwide Christmas Bird Count program, our chapter has conducted a bird census at the Hagerman WMA for over 40 years (see Appendix A). Fifteen years ago, the Hagerman WMA was designated as an Important Bird Area (IBA) by the Idaho Department of Fish and Game and the National Audubon Society. http://iba.audubon.org/ibalviewSiteProfile.do?siteId=558&navSite=state In addition, the WMA is part of the Idaho Birding Trail system. http://fishandgame.idaho.gov/ifwis/ibt/site.aspx?id=SW36	Effects to waterfowl are considered in Section 3.10.
101648	(ix)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Thousands of waterfowl are injured and killed each year throughout the United States because of collisions with transmission lines. This is well documented. Even the energy industry's own literature states that these lines need to be sited away from waterfowl flyways such as the one found in the Hagerman Valley.	This is disclosed in the analysis in Section 3.10.
101648	(x)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The Hagerman Valley also is a prominent part of the popular "Thousand Springs Byway" which has 11 priority resource sites, five of which are located in in this valley. Another mega transmission line would be a detriment to important scenic and recreational values found here.	Comment noted. The BLM recognized that there is important waterfowl habitat in the valley.
101648	(xi)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological,	Comment noted.

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			environmental, air and atmospheric, water resource, and archaeological values."(SEIS). BLM's RMPs are documents written to uphold these protections for the public trust.	
101648	(xii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	PFA believes the changes made to Bureau of Land Management (BLM) Field Offices' Resource management Plan (RMP) amendments as stated in the SEIS in general and in particular, amendments to the Cassia RMP, Twin Falls Management Framework Plan(MFP), and the Jarbidge RMP are unwarranted, detrimental, and undermine the public trust. Importantly, instead of working within the confines set by the BLM F.O.s' RMPs, for the protection of invaluable natural resources for the public good; Proponents seek to undermine it.	Comment noted.
101648	(xiii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The SEIS states, "As with FEIS Proposed 9, the Segment 9 Revised Proposed Route would cross approximately '2.7 miles of the Salmon Falls Creek ACEC (Table 3.17 -17). Note: Areas of Critical Environmental Concern (ACECs). These are areas the BLM identifies as part of the RMP in order to protect a variety of sensitive resources such as important habitat for imperiled wildlife, sensitive cultural resource areas such as archeological sites, rare geological features, or other unique attributes that deserve some form of conservation and special management.	Comment noted.
101648	(xiv)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	BLM Burley FO. management arbitrarily decided, without public knowledge. input, or regard; to change the route, in segment 9, after the Draft EIS, and take the line along rim of and across the Salmon Falls Creek Canyon, including Lily Grade. This is an illegal move by the Burley FO management and the proponents of this project.	There is nothing illegal in making changes to a route between a draft and final EIS. The routes considered in the DEIS changed between draft and final in many places. It is a normal part of the EIS process to make changes to routes or to add or drop routes In fact, two new variations have been added to this FSEIS.
101648	(xv)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The proponents were aware this area is designated as a Area of Critical Environmental Concern (ACEC) in both BLM's Jarbidge F.O. and Burley F.O.'s, Twin Fall District on both The sides of Salmon Falls Creek Canyon. The canyon is also designated as a ACEC as well as a Outstanding Natural Area(ONV), eligible Wilderness Study Area (WSR), and A Special Recreation Management Area (SRMA). There was a different publicly disclosed route, Alternative 9C, in the Draft EIS. The FEIS states, "No amendment for this area was proposed in the Draft EIS because it was thought that crossing the WSR at the proposed location would not be consistent with WSR management goals.", .. "An alternative crossing of the river (Alternative 9C) would avoid the eligible WSR and the ACEC (emphasis added)." ... "The Burley FO has stated that the WSR classification at this location is "Recreational" and that this crossing would not have a negative effect on the outstandingly remarkable values (ORVs) for that classification (emphasis added). Amendments for crossing the ACEC and VRM Class II lands are therefore provided in the Final EIS." FEIS F1-31. At the time we couldn't find the above mentioned alternative 9c on the BLM's interactive project map, because the map doesn't show any of this part of the project. It was not included on the map in FEIS appendix F.1-34.	Comment noted. The DEIS disclosed that the BLM cannot authorize crossing in the eligible scenic portion of the river. The route was moved between draft and final in order to avoid crossing in an eligible WSR. This was disclosed in the FEIS.
101648	(xvi)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Both Jarbidge RMP and Twin Falls MFP direction for Visual Resources gave explicit instructions on how the ACEC and Salmon Falls Creek Canyon should be managed. A amendment has already been made in the Jarbidge 2015 RMP changing a important designation of the ACEC along the west side Salmon Falls Creek Canyon allowing a 500-kV transmission line to cross Salmon Falls Canyon in anticipation of the east side Twin Falls F.O. RMP amendment to the illegal change of the FEIS route without public imput that negated the NEPA process.	The change to the west side of the Salmon Falls Creek was made in the 2015 Jarbidge RMP. The Twin Falls MFP specifically states that the east side of the creek will be managed as directed in the Jarbidge RMP.
101648	(xvii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Interested public was not given this information or the opportunity to comment. BLM and proponents of this project violated National Environment Policy Act (NEPA) when they knowingly introduced new and additional information in their final Environmental Impact Statement (FEIS) concerning where their transmission line will cross public land in the Burley BLM Field Office (F.O.) as described in our appeal. Gateway PFA Declaration Statement 12- 21-2013, pgs: 1, 5, and 6. This information is still relevant as this appeal is still unresolved!	This is not correct. The public was given the opportunity to comment on this change during the comment period on the FEIS and the protest period for proposed plan amendments that followed the publication of the FEIS. These comments were considered in the ROD. No decision on the crossing was made in that ROD. The BLM elected to continue to analyze Segments 8 and 9.
101648	(xviii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	In reading through the Special Management Areas section, the statement "Therefore, a transmission line crossing this portion of the eligible WSR segment would not affect the river's suitability as a Recreation River."	Comment noted.

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101648	(xix)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The proponents through a amendment, want the BLM to reduce the important designation of the ACEC as well as WSR with ORVs.to a recreational designation. It's like redesignating a Classic Bentley luxury sedan, to a AMC Gemlin and then allowing it to be treated as such. Granted the ACEC has been beaten but it still retains it's unique OVR's and deserves to remain a ACEC. It's a classic and should be treated a such! The BLM has the discretion to disallow this amendment for the future enjoyment of wide open vistas in a natural setting not far from the City of Twin Falls. This will be far more important in the future to the area.	As disclosed in the EIS, the amendment would affect the ACEC but not the suitability of the Recreation portion of the river.
101648	(xx)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	PFA believes: proponents objectives "which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs" (FEIS) can be done within the confines of existing energy corridors to increase efficiency and reliability. "The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible." (SEIS)	Comment noted.
101648	(xxi)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	There's still no reasonable explanation by proponents or BLM for the split line through Idaho. The huge cost and willingness to combat the controversy of the southern split, numbers 7,9, and 10, leads us to believe they have other plans, such as future development of proposed ill-sited wind farms: Cotteral Mountains, China Mountain, Simplot, and South Hills Important Bird Area, etc. Thereby further degarding sage-grouse and other wildlife's habitat. "Other projects would continue, including other transmission line projects, wind farms. solar projects, ... The demand for electricity, especially for renewable energy would continue to grow in the Proponents' service territories." This is a clue as to the who the customers would be in the project areas.(SEIS)	As disclosed in the DEIS, FEIS, and this analysis, the purpose of separating the lines is to increase reliability and to serve customers in different areas.
101648	(xxii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	PFA believes the reasoning behind the need for the amendments is very clear. BLM and Project Proponents believe energy companies takes precedent over anything that stands in the way of this project's construction across public land. Public land apparently has been set aside not for quality and sustainable use for future generations as stated in FLPMA (P.L. 94-579, Section 102(a)). An example of this is the changes already made to the Jarbidge RMP concerning the Salmon Falls Creek ACEC	The need for each amendment is discussed in Appendix F.
101648	(xxiii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	"The EIS identifies opportunities to mitigate the impacts of siting and building Segments 8 and 9, if a ROW is granted, by incorporating avoidance, minimization, and compensation measures with consideration of local and regional conditions" Mitigation as portrayed will take care of most of the impact issues throughout the project, in reality when compared to the substantial negative impacts, the proponents mitigation strategys are not site specific and woefully small, inadequate, and apparently still in the development stage.	Comment noted. Refer to Appendix K in this analysis for additional information on mitigation.
101648	(xxiv)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	When reading through the SEIS and FEIS we couldn't find where the above statement is true. There's no "avoidance, minimization, or compensation measures" for the important and unique areas such as the Salmon Falls Creek ACEC. If the statement above were true, there would be no need the change the RMPs. The only possible avoidance is to more convenient area to disturb such as the SRBOP, Golden Eagle Audubon stated, "Our simple conclusion was that a route through the Birds of Prey Area presents the lesser of two evils." http://www. goldeneagleaudubon.org/Gateway-West-Transmission-Line	Please see the summary in Appendix K to this document.
101648	(xxv)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	"The MEP does not provide sufficient details or specifics for development of such mitigation actions related to habitat restoration. The lack of detail or specifics in the MEP makes it unclear how the MEP goals would be achieved." (SEIS). Clearly there's a need for site specific data and analysis for this project.	Our analysis agrees that the MEP does not provide enough information to fully evaluate it. The BLM is not adopting the MEP. It is developing mitigation in cooperation with the proponents and cooperating agencies. See Appendix K.
101648	(xxvi)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Under "Habitat Restoration we find," The goal for the Proponents' habitat restoration proposal is to convert "non-native grasslands to native perennial plant communities" as well as to conduct "noxious weed control. Proposed funding to restore habitats within the SRBOP would have no effect on agricultural resources. Habitat restoration could occur in areas currently used as rangeland and pasture, but this potential reduction in rangeland and pasture would likely only affect a very small share of this type of land in the Analysis Area."(emphasis added) (SEIS). In other words there will be little to nothing done to curb destructive land uses such as heavy grazing throughout the year.	Our analysis agrees that the MEP does not provide enough information to fully evaluate it. The BLM is not adopting the MEP. It is developing mitigation in cooperation with the Proponents and cooperating agencies. See Appendix K.

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101648	(xxvii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	The problems found in the SRBOP are due to very poor and shortsighted management by federal and state agencies that have allowed the spread of invasive weeds and grassed throughout the area without little to no protection of the native sage-steppe vegetation or it's wildlife, even allowing indiscriminate shooting of prey species throughout the area.	Comment noted.
101648	(xxviii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	If BLM persists in allowing grazing to continue at it's present stocking rate and there's no changes as to when these areas slated for mitigation are grazed, e.g. destructive spring grazing; grazing new seedings, after only two growing seasons etc, based on 30 yrs. experience, we believe any mitigation will be short-lived and a waste of time and money.	Changing grazing policies is beyond the scope of this project-level EIS.
101648	(xxix)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	There's ways to truly mitigate these issues, but apparently the agencies lack the backbone to make the hard decisions it would take to make mitigate work in the long term. As natural undisturbed areas of public land become scarce, true mitigation becomes nearly impossible. How can the proponents mitigate visual values? They can't, they ask BLM to revise (downgrade) the RMP plans to fit their project.	Comment noted.
101648	(xxx)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Proponents consistently acknowledge their added adverse effects throughout the SEIS; direct, indirect, and cumulative impacts throughout the project area during all phases of the project yet at the same time they state the opposite. Below are just a few excerpts as examples: · "surface disturbance from the Project within just a half a mile from occupied sensitive plant habitats". • "Visual resource or scenic specifications for allowable levels of visual contrast would have to be altered" That is to say, blight visual resources across unique western landscapes along it's routes for the foreseeable future. • "important migratory bird habitats and ecological conditions through vegetation removal, fragmentation of native habitats, and possible increased in predation pressure by predators." To be adversely and permanently affected. "Gateway West would not have measurable adverse effects on natural resources within the project area."	The EIS is not being prepared by the Proponents. The BLM prepared the analysis. The statements mentioned in the comment are part of the BLM's analysis.
101648	(xxxi)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Though the SEIS acknowledges the ongoing threats within their project area such as livestock overgrazing and invasive grasses and weeds, etc. They state that these threats would continue with or without their transmission line. In this they are correct, but the added effects of a mega transmission line do substantially add to these threats as mentioned above, especially when coupled with the destructive RMP amendments and the challenges they represent for future management.	The EIS identifies how past management and other factors, such as the long-term drought, have adversely impacted resources and concludes that the transmission lines would add to existing impacts.
101648	(xxxii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Again, instead of working within the confines set by the BLM FO.s' RMPs, for the protection of invaluable natural resources for the public trust, proponents seek to undermine it. Thus, many of the impacts throughout the project area can't be mitigated beyond a short time, especially for sagebrush-steppe obligations such as sage-grouse and pygmy rabbits, As undeveloped areas of public land are becoming scarce, true mitigation becomes nearly impossible. Also how can visual values be mitigated? Only be siting the project elsewhere.	Comment noted.
101648	(xxxiii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	We find in the SEIS the same types of general data and analysis found FEIS. It needs to be site-specific and detailed, "The NEPA analysis for Gateway, though a very thick stack of paper, does not provide the necessary site-specific details to fulfill NEPA's hard look requirements at direct, indirect and cumulative impacts and mitigation actions. The still uncompleted surveys, reports and plans constitute avoidance, minimization and mitigation measures -ranging from cultural and historical resources to controlling project destruction and impairment actions that will seriously impact wildlife and sensitive species habitats and populations. These species include sage-grouse, pygmy rabbit, and migratory birds." Appellants Response to Stoel Rives LLP, Council to Pacificorp and Idaho Powers' (Respondent-Intervenors); Answer to Statement of Reasons, IBLA Docket No. 2014-55, WYW- 174598; IDI-35849. Dated: May 5, 2014	We believe that the analysis includes an appropriate level of resource information for a project of this scope. For example, the HEA provides detailed baseline information on over 7 million acres of shrub-step habitat.
101648	(xxxiv)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	We found the SEIS to be confusing and difficult to navigate through	We tried to make the document understandable; however, the SEIS contains a lot of information covering over hundreds of miles and many thousands of acres It deals with complex issues; there is no way to analyze a complex project in a simple way.
101648	(xxxv)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	We ask that the illegal section through the Salmon Falls Creek ACEC to Lily Grade be dropped as the proponents already had 9c set out for public comment. That is what was offered through NEPA and what the public was commenting on.	The Salmon Falls Crossing is not illegal. See the response to you comment on this above.

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101648	(xxxvi)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	As the SEIS is written, proposed project would substantially increase negative impacts, the proposed amendments would significantly downgrade protections to important and unique natural resources such as visual, wildlife, and special designated areas put is place for future generations.	The EIS acknowledges that amendments would reduce protection for some resources, see Appendix F and G. It is up to the authorized officer to determine if the amendments are approved.
101648	(xxxvii)	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY,JULIE RANDELL	Again, FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values."(SEIS). BLM's RMPs are documents written to uphold these protections for the public trust	The RMPs are living documents designed by law to be amended as conditions or public needs change. The EIS and SEIS follow FLPMA direction in this regard. The EIS acknowledges that amendments would reduce protection for some resources, see Appendix F and G. It is up to the authorized officer to determine if the amendments are approved.
101650	(i)	US ARMY CORPS OF ENGINEERS, WYOMING,THOMAS B JOHNSON	The revised proposed route for Segment 8 under Alternatives 1, 2, and 3 crosses the Snake River at Noble Island, which is within the navigable segment of the river that extends upstream of the island to River Mile 445.5. Authorization under the RHA would be required prior to construction of that crossing. None of the other proposed routes for Segments 8 and 9 would cross a navigable water.	The information that authorization under the RHA would be required prior to construction of that crossing the navigable segment of the river has been included in the Final SEIS.
101650	(ii)	US ARMY CORPS OF ENGINEERS, WYOMING,THOMAS B JOHNSON	Adverse effects on aquatic resources, especially wetland losses, along the route should be avoided and minimized to the maximum extent practicable. The alternatives analysis shows full consideration of all ground disturbance during construction due to roads, foundations for towers, storage yards, and other activities. Actual wetland losses would be much less because many construction related affects would be limited to short-term ground disturbance, such as road crossings that would be removed or narrowed after construction resulting in a 66% reduction.	The Draft SEIS identifies adverse effects on aquatic resources, especially wetland losses, along the route should be avoided and minimized to the maximum extent practicable. The 2013 Final EIS and this SEIS include measures to avoid and minimize impacts to wetlands. See WET-1 through 4.
101650	(iii)	US ARMY CORPS OF ENGINEERS, WYOMING,THOMAS B JOHNSON	The DSEIS identifies Alternatives 2 and 5 as co-preferred alternatives for the project. Alternative 2 could affect 4.9 acres of wetland during construction with a potential loss of0.70 acre due to operation of facilities, which is the highest amount of the alternatives. Alternative 5 could affect the least amount of wetland at 1.3 acres during construction and a potential loss of 0.20 acre over a distance of 321.5 miles. That amount of loss would be extremely low for a project that crosses such a large geographic area indicating that avoidance of wetlands has been an important objective during the planning process. The USACE supports selection of Alternative 5 as the preferred alternative.	The SEIS identifies low adverse effects on wetlands over the span of the project for Alternative 5. Additional micrositing of the project could further reduce impact acreage.
101651	(i)	CRAIG T & SHEILA WHITTED	I like the alternative 1, segment 8 and 9. The reason I like that plan is it follow the existing power lines. By putting the new lines next to the old lines you could use the dirt tracks and roads from their construction to build the new power lines. These would be less of an impact to the environment.	Your comments on the benefits of Alternative 1 are noted.
101653	(i)	MERRILAN SIMPER	It is evident that Alternative #1, the Snake River Birds of Prey National Conservation Area is the best option for the Gateway West Transmission Line Project. It benefits both birds and humans. There is an existing 138 kV line and a road on this route. After the 500kV line is in place, then the 138kV line will be attached to the new towers. The impact will be only one power line with benefits to the raptors. The towers provide nesting areas, perches and hunting surveillance. Alternative #1 saves the humans from Alternative #2 which comes within 200 feet of our home and right down the middle of our farm. Besides the devaluation of our farm and home, the 500kV power live threatens our health.	Your comments on the benefits of Alternative 1 are noted.
101653	(ii)	MERRILAN SIMPER	Research proves that electricity is harmful to humans. Adults are 57-60% water and infants are 75-78% water making us conductors of electricity.[1] We have our own electric pulse or frequency to help cell division, digestion, our heart and brain activity. Dr. Albert Szent-Gyrogyi, a Nobel Prize Winner, stated, "The living cell is essentially an electrical device." Alternating current is an Electro Magnetic Field which disrupts our frequency. Even an electric alarm clock less than 4 feet away is not recommended. Another expert in this field also agrees that electricity has a negative impact on our health. The Dean at the School of Public Health, State University of New York, Dr. David Carpenter's research concluded that excessive exposure to magnetic fields from power lines and other sources of electric current increases the risk of development of some cancers and neurodegenerative diseases,[2] and he believes that up to 30% of all childhood cancers come from exposure to Electro Magnetic Fields. [3] Further research has brought to light that Electro Magnetic Field Exposure is linked to hypertension, miscarriages, the suppression of melatonin, damage to the bloodbrain barrier, Alzheimer's disease, breast, prostrate, and brain cancer,3 childhood leukemia,[6] and thyroid problems,[4• 8] also Attention Deficit Disorder and Hyperactive Disorder/· [9] diabetes,[4 • 8 • 9] Multiple Sclerosis,[9] ALS or Lou	Impacts to human health as a result of the electromagnetic field are addressed in Section 3.21 of the SEIS.

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			Gehrig's disease,[8] and asthma. [9] EMF Exposure is also suspected of causing fiber myalgia, [8] and depression, anxiety, chronic pain, memory loss, sleep disorders, tinnitus, respiratory problems3 and chronic fatigue syndrome,[9] • Epidemiological studies in Sweden by Maria Feychting showed that individuals exposed to high levels of EMF had 3. [7] times the risk of developing leukemia compared to those who were not exposed. [10] These are the risks we will face if we have to live and work in our yards, garden and on our farm next to a 500,000 Volt Electro Magnetic Field with Alternate Route #2.	
101653	(iii)	MERRILAN SIMPER	Our farms benefit the Birds of Prey. Many of the Birds of Prey have moved off "the reservation" and are thriving on the lush habitat and abundance of prey provided by the farm ecosystem. The farmers are protecting the Birds of Prey. The Birds don't seem to mind living around humans.	Comment noted
101653	(iv)	MERRILAN SIMPER	The best choice is obvious. By allowing the Gateway West Transmission Line Project to use Alternative #1, the Revised Proposed Route (DC 5001138-kV) through the Snake River Birds of Prey National Conservation Area, the raptors benefit and there is minimum impact to the Conservation Area, the farmers are saved from loss of health and loss of financial living and the Birds of Prey are given an ally who helps them to thrive and multiply.	Your comments on the benefits of Alternative 1 are noted.
101654	(i)	CRAIG T & SHEILA WHITTED	I like the Alternative 1, Segment 8 and 9 that follow the existing power lines. The reason I like that plan is because there is a dirt track already established for the existing line that could possibly be used for, or in part, for the new line construction. If the new lines went in a new location there is not a power line with a dirt track. There would be a larger impact to the environment.	Your comments on the benefits of Alternative 1 are noted.
101655	(i)	SIMPLOT LIVESTOCK CO.,DARCY HELMICK	Simplot Land & Livestock is a property owner within the area of the proposed alternatives for segments 8 and 9. We are in support of Alternative 1, and believe it is the only reasonable alternative for these segments. We have also had the opportunity to review comments submitted by Governor Otter on behalf of the State of Idaho, and are in full support of those comments. Alternative 1 was collaboratively agreed upon by constituents of the impacted area, as represented by the RAC Gateway West Subcommittee. It is the only reasonable alternative for segments 8 and 9 of the Gateway West Project. Alternative 1 would have the least amount of impacts on sage-grouse, natural vegetation, waterbody crossing, prime farmland, and undisturbed land by falling within land already with existing infrastructure.1 Although these routes cross Simplot private lands, due to our participation in the original negotiation of these lines, we believe this alternative would have the least amount of impact to our private lands and surrounding public lands as compared to the other alternatives.	Your comments on the benefits of Alternative 1 are noted.
101655	(ii)	SIMPLOT LIVESTOCK CO.,DARCY HELMICK	All other alternatives are unacceptable, as clearly stated by Governor Otter's comments. Of specific concern is the Segment 9 FEIS proposed route of the co-preferred alternative, primarily due to the copious impacts to private property owners and agricultural producers within the Grand View and Bruneau areas, including Simplot. Simplot owns private property that is within the 2-mile buffer of the proposed line throughout township and ranges T05SR03E; T06SR03E; T06SR04E; T06SR05E and T07SR06E. BLM must re-consider negative impacts to property owners if the transmission line is placed as Segment 9 FEIS Proposed Route. Specific to property values, the BLM relies upon analysis from the 2013 FEIS to fulfil the majority of the analyses for socioeconomic impact in the DSEIS. Specifically, "Some short term adverse impacts of residential property values (and salability) might occur on an individual basis as a result of the Proposed Route and Route Alternatives. However, these impacts would be highly variable, individualized, and unpredictable."2 This is an unacceptable analysis and needs to be revisited. Other economic impacts were only vaguely analyzed. The financial impacts to agricultural productions could be high in areas where new transmission installation would require movement of current irrigating systems, and could be restrictive in certain management techniques, such as aerial application of fertilizer.	The Analysis does consider impacts to private property and to CAFOs, farmland and farm operations. See Sections 3.4 and 3.18 in the 2013 FEIS and in the SEIS. We note that contrary to many comments, Alternative 1 impacts crosses nearly 18 miles more private land than Alternative 5 (55.5 miles compared to 32.7 miles). While the BLM does consider impacts to private land, it must also consider many other resources on federal land that it is required by law to protect and enhance. Also note, the BLM only makes decisions for federal lands, the county has the permitting authority for siting transmission lines on private land.
101656	(i)	ERNIE BREUER,ROBYN C THOMPSON	We were told that siting of segments 8 & 9 would be an Idaho decision and that the Agency would abide by the recommendations of the RAC committee.	The BLM engaged the local community and the RAC in a process which it hoped would lead to a consensus. The BLM must balance the desire for consensus with its obligation under congressional legislation that established the NCA, as well as other laws and regulations. The RAC was asked to provide advice to the BLM, not make decisions on

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				the project. Only a federal officer (such as the BLM State Director, the BLM National Director, or the Secretary of the Interior) is authorized to make decisions on BLM-managed lands.
101656	(ii)	ERNIE BREUER,ROBYN C THOMPSON	The Agency has given segment 8, Owyhee Countie's hard fought route in the SRBOP in Alternatives 6 & 7. This tells us the Agency considers paralleling the existing 138 kV line, utilizing the Baja Road, is a viable route. WE WANT IT BACK!!	Your support for the Baja Road alignment is noted. The BLM considered the Baja Road alignment through the NCA a viable route and analyzed it in the SEIS. Just because a route is viable does not mean that it is the best way to meet the enabling legislation for the NCA.
101656	(iii)	ERNIE BREUER,ROBYN C THOMPSON	3.5 Environmental Justice 3.5-1 "This section analyzes the potential for Project activities to have disproportionately high or adverse human health or environmental effects on minority and/or low-income populations in accordance with EO 12898. The premise of this chapter is that all three counties (Ada, Canyon and Owyhee) are being treated equally and fairly reguarding the siting of segments 8 and 9 of the GWWTLP. Of these three counties, Ada County is by far the most heavily populated and the wealthiest. Canyon County, although not quite as well off as Ada County, by far exceeds Owyhee County. This document completely spares Ada and Canyon counties from any negative impacts of the GWWTLP. The "Treasure Valley will receive 17% of power transported by GWWTLP." "Owyhee County (Alternatives 2-7) is being saddled with all of the negative impacts "and will not receive one watt of power." The previous information in quotes was obtained from Doug Doctor, Engineer, Idaho Power, February 26, 2009 @ the Rimrock High School Auditorium. The following pages contain the facts that Owyhee County is the second poorest county in Idaho. Shame on the Agency for even developing Alternatives 2-7. The Agency is bulling one of the 3 poorest counties in Idaho.	Environmental Justice is a concept defined by law (see Section 3.5.1.1 for the CEQ and USEPA guidelines), the analysis in Section 3.5 of both the EIS and SEIS fully conform the requirements of that law. Whether one county is more prosperous than another or one county would benefit more than another are not a consideration under the CEQ and USEPA guidelines. In terms of treating counties equall6y, you are correct that the BLM does not favor the people in one county over those in another. Your comment that impacts should fall on wealthier counties rather than on Owyhee County is noted.
101656	(iv)	ERNIE BREUER,ROBYN C THOMPSON	3.4 Socioeconomics Idaho has 44 counties. Owyhee County is the second poorest county in the state. Owyhee counties economy is based largely on agriculture (74%) – Table 3.4-8. Supportive small business (Agri lines, convenience/gas stores, restaurants and bars) contribute to the economy as well as folks traveling to our county for their recreational enjoyment. The SEIS clearly enumerates the devastating impacts Alternatives 2 thru 7 will have on Owyhee Counties economy and tax base. Pages 3.4-43 thru pgs 3.4-51. Alternatives 2-7 are compared to Alternative 1 in mileage. It is impairative to note both segments 8 and 9 in Alternative 1 already have existing roads decreasing the cost of construction. Alternatives 2-7 will all require brand new roads to be constructed in either agricultural lands or "green" territory that is not only void of infrastructure but will result in the distruction of miles of sage brush in, sometimes, rugged terrain. Particularly offensive the Agency points out that Alternatives 2-7 will all add milage to Owyhee County. The increase in milage would be "offset by relative decreases in Ada and Elmore Counties". In these pages the Agency brazenly admits that they are removing all of the negative socioeconomic impacts from Ada and Elmore counties and dumping all of the negative socioeconomic impacts on Owyhee County, remember – the second poorest county in Idaho. We find this to be outrageous, especially because it is totally unnecessary. The Agency clearly needs to choose Alternative 1. There is absolutely no need for Owyhee County to absorb this negative impact.	The SEIS does not conclude that the Project would have a devastating impact to the Owyhee County tax base. The Proponents would pay sales taxes, use taxes, and property taxes. Estimated taxes generated by the Project are listed in Tables 3.4-32 through -35 in Section 3.4 of the DSEIS. The yearly property taxes for Alternative 1 paid to Owyhee County would equal approximately 22.6 percent of the total county 2014 total property tax. The property taxes paid under Alternative 5 would equal approximately 55.1 percent the total county 2014 total property tax. Miles of new roads and miles of roads needing improvement are listed in Table 3.19-2.
101656	(v)	ERNIE BREUER,ROBYN C THOMPSON	3.18 Agriculture We are including 3.18-1 thru 3.18-10 and 3.18-13 thru 3.18-22 of the DSEIS as well as 3.18-13 and 14 of the FEIS. We are also including pages 7-15, Appendix K of the FEIS. We will point out inconsistencies and inaccurate information by comparing these separate documents. Pg. 3.18-6 re: construction states "unlikely to noticeably affect overall agricultural production and employment in any of the affected counties." We find this to be an amazing statement concidering Alternatives 2, 4-6 re: segment 9 – traverses 24 miles of prime farmland. This is easily discerned by	Your comments on the effects to prime farmland and on agricultural operations are noted. Please note that the 250-foot-wide easement is not the same as the area disturbed by construction or affected during operation of the lines. Towers would be placed approximately 1,200 to 1,500 apart. Approximately 1 to 1.4 acres of land would be

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			studying the Tetra Tec maps obtained April 21, 2016 @ the DSEIS public meeting. The center pivots are quite visable and we have the advantage of knowing the geography. This is our home. Please reference Table 3.18-4 of the DSEIS. We refute the Agencies numbers re: Prime Farmland Affected by Construction and Operations in Segment 9. Remember the Revised Proposed Route is largely sited paralleling a 138 kV line with an existing road. The FEIS proposed 9 traverses 24 miles of prime farmland without an existing road. The actual prime farmland acres affected = [Table below formatted as: route – County – Prime Farmland Acres Affected, Construction – Prime Farmland Acres Affected, Operations] Revised Proposed Route – Owyhee – 0 – 0 FEIS Proposed 9 – Owyhee – 732 – 81 We included the 250' easement in our calculations. We know these numbers are accurate. WE have served on the Owyhee County Task Force since it's inception, April 2009.	disturbed for each tower during construction. A much smaller area (approximately 0.2 acre per tower) would be lost to production during operations, see the independent analysis in Appendix K to the 2013 FEIS completed by an agricultural specialist working with the farmers of Power County and Cassia County Taskforce. Most of the area between the towers would not be disturbed, generally, only a temporary access road would be needed across farmland. The temporary road would be restored following construction.
101656	(vi)	ERNIE BREUER,ROBYN C THOMPSON	The Soda Fire: We are including an excellent article in The Owyhee Avalanche enumerating the loss and devastation to our county. We will be years digging out from underneath that one. PHMA's (sage-grouse) took enough of a hit to justify the Agency to manage IHMA's as PHMA's to maintain sufficient PHMA's to support GRSG populations. This is not an issue for Alternative 1. There are not any sage-grouse in the SRBOP NCA! The Soda Fire has demonstrated the irresponsibility and just plain bad judgement to select Alternatives 2-7. At its hight the Soda Fire was traveling @ 5 miles/per hour. The Joyce Ranch, Silver City and the Community of Oreana were very aware of the impending threat of this mega-fire. At the rate of 5 mi/hr we personally were expecting this disaster to wipe us out in 3 hours. This is one of the many reasons no one in Owyhee County endorses any of the Alternatives 2-7. We are also enclosing some pictures shared by neighbor and friend Carol Brand; all taken @ her Bates Creek, Oreana Juniper Mountain Arabian Horse Ranch and surrounding public lands. Criminally these photos could have become black as coal. We have to get smarter, a lot smarter @ preventing devastation @ this level: keep the fuel loads down, keep roads open – they serve as fire breaks and enable access for firemen and equipment.	Your comments on the benefits of Alternative 1 and on the Soda Fire are noted.
101656	(vii)	ERNIE BREUER,ROBYN C THOMPSON	4.2.1.3 Existing Roads The only Alternative that has existing roads is Alternative 1. Alternatives 2, 4, 5 and 7 would all require brand new roads ripping up miles and miles of sage-grouse habitat. These alternatives are irresponsible sited in what the Agency refers to as "green". 95% of the land these alternatives are sited on has absolutely no infrastructure – none. Alternatives 2,4 and 6 also would have to have brand new roads constructed. Owyhee County only has 17% of the land as private property. These alternatives (sitied in the WWEC) will require 18.4 miles of road to be constructed in prime farmland. Looking @ the Tetra Tec maps from 2009 to present one will notice marked increases in center pivots. There is no need to rip thru this farmland with not only a sizable road but also a 200' 500 kV line. 38.8 miles of brand new road will be in the public land where once again this land is "green" without infrastructure and will again annihilate sage-grouse habitat.	Your comments on the benefits of Alternative 1 are noted. Note that new roads would still be required if Alternative 1 was approved.
101656	(viii)	ERNIE BREUER,ROBYN C THOMPSON	The reader must know: policies are NOT LAW. Policies must be harmonious with the superceeding NCA Enabling Legislation. Policies that are not "as one" with the Enabling Legislation (law) are null and void. We contend that these policies contain allowances for the Agency to grant ROWs for both Segment 8 and Segment 9 (Alternative 1) in the MNSRBOP NCA.	The SEIS assesses the feasibility and the requirements that would need to be met in order to route the Project though the NCA.
101656	(ix)	ERNIE BREUER,ROBYN C THOMPSON	As you know segment 9 of Owyhee County was not sited on Federal Land, impacts as much private land (homes and pristine farmland) as it possibly can, the Agency did not have local units of government or other interested parties in consultation, are ignoring sensitive species (i.e. sage grouse) and did not incorporate the designated corridor into a resource management plan.	NEPA requires that an EIS assess feasible alternatives to a proposal. Inclusion of an alternative into an EIS does not signal an acceptance of said alternative. Also, NEPA does not require a complete consensus on alternatives included in the analysis. An EIS is not a decision document, and no decision regarding routes or alternatives have been made at this time.

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101656	(x)	ERNIE BREUER,ROBYN C THOMPSON	Alternative 1: Endorse The only alternative with 100% consensus in Idaho. Endorsed by our Governor, the 1st Congressional District, the Owyhee County Commissioners, the Owyhee County Task Force and residents of Owyhee County. This is the only Alternative that is sited where the environmental impact already is. The road was constructed in 2009 with Obama stimulus money. Our proposal parallels an exhisting 138 kV line. Once the 500 kV line is constructed it could be double circuited thus still leaving only one line. The Agency has validated our alternative as a viable route by giving it to segment 8 twice; in Alternatives 6 and 7. WE WANT IT BACK!!!	Your comments on the benefits of the Baja Road alignment through the NCA are noted.
101656	(xi)	ERNIE BREUER,ROBYN C THOMPSON	Alternatives 2, 4 and 6 Oppose. We have commented on this atrocity until we are blue in the face! We still contend the Agency is violating Sec. 368 of the 2005 Energy Act. We have already addressed in this lengthy comment all of the reasons these alternatives are absolutely intolerable. We are in our 8th year of this process. We cannot believe after all of our comments and record numbers of attendees at every public meeting that the Agency has the unmitigated gall to resurrect this abomination1 This route (thru all of our private land and prime farmland) will not be tolerated. We want this route and this illegally sited corridor deleted!	The BLM is not violating Sec. 368 of the 2005 Energy Act. The WWE Corridor was established on federal land; areas between federal parcels are not part of the WWE Corridor. The corridor is not illegal.
101656	(xii)	ERNIE BREUER,ROBYN C THOMPSON	Alternatives 3, 4 (8G), 5 (8G/9K) and 7 Oppose: Impacts miles and miles of “green” land-scape with absolutely no infrastructure. Parallels the Bruneau Wild and Scenic River and then crosses said river. The construction would destroy miles of sage-grouse habitat and as if that is not enough leaves permanent steel trees for raptors to perch, hunt and nest. The raptors will eat every last sage-grouse—hitting the 20% hard trigger – the BLM will “shut the land down” – fuel loads will grow out of site leaving Owyhee County a black vast waste land. The Agency has exempted Gateway West. This is not science. This is an arrogant agenda. Alternative 5 (2 500 kV lines 250’ apart) does not meet the utilities needs – there is no “loop of reliability”. This alternatives impacts private property in Bruneau and Oreana – all prime farmland; the Historic Joyce Ranch and the Gene Lewis Subdivision.	Your comments on the benefits of Alternatives 3, 4, 5, and 7 are noted.
101657	(xviii)	ERNIE BREUER,ROBYN C THOMPSON	With “8G/9K” on my mind, I asked Brent if he could communicate this sage-grouse information to Dave Murphy so that Dave could get this across to BLM Washington D.C. because this is the exact reason that 500 kV lines should not be sited through Owyhee County. If the Agency allowed construction of 8G/9K we would have two 500 kV lines 250’ apart through Owyhee County for raptors to perch, hunt and nest off of in perpetuity. If the “hard trigger” wasn’t hit in construction of these lines (destroying miles of habitat) to accommodate both of these lines and the road (coupled with the loss of 280,000 acres caused by the Soda Fire) – it would be inevidable the “hard trigger” would be hit due to the Agency giving the nod to put in place permenate 200’ steel “trees” for predators to utilize, to destroy, the sage-grouse. Once these 500 kV lines are erected there is no going back. There are not any trees in the path of 8G/9K (in the public lands). The Agency could release a ROW that would put in place the very mechanism that will indeed guarantee the extinction of the very species they are vowing to protect. This is the very definition of irony! I just know that Washington D.C. could not possibly know the repercussions of 8G/9K impact to the sage-grouse. They needed to be told—immediately!	The impact that this project could have on sage-grouse is disclosed in Section 3.11 of the SEIS. The SEIS acknowledges the potential impact that raptors and ravens perching on the line could have to sage-grouse. There is no scientific evidence to support the claim that construction of this project would "guarantee the extinction of" this species.
101657	(xix)	ERNIE BREUER,ROBYN C THOMPSON	Please refer to 1.10.7 Segment 7 from the ROD November 2013 (enclosed). Segment 7 was (is) sited primarily on private land using sage-grouse, et habitats as the Agencies rational.	The decision on Segment 7 was made in the 2013 ROD. It is not being reconsidered in this SEIS.
101657	(xx)	ERNIE BREUER,ROBYN C THOMPSON	Please refer to the ROD and ARMPA’s for the Great Basin GRSG sub-regions page 1-30 (enclosed). This document was published September 2015. As you know, residents of Owyhee County were severly impacted by the Soda Fire which was started August 10, 2015 (caused by lightning) and was not fully extinguished until August 25. This fire charred 283,686 acres, creamating PHMA – bird and habitat. The above reference address Idaho’s categorization “IHMAs.” IHMAs are BLM administered lands that provide a manage-ment buffer for PHMAs and connect patches of PHMAs. IHMAs encompass areas of generally moderate to high conservation value habit and/or populations.	The project's potential effects on local fire regimes are disclosed in Sections 3.6 and 3.22. IHMAs as well as other agency designated sage-grouse habitats are included and assessed in the SEIS.
101657	(xxi)	ERNIE BREUER,ROBYN C THOMPSON	Again, the only Alternative Owyhee County endorsees is Alternative 1—where none of this is an issue.	Your preference for Alternative 1 is noted.

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101658	(xxxviii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	A. Statutory authority requires BLM deny the Gateway West Transmission Line Project in Idaho (the "Project"). The Bureau of Land Management must deny the Project and choose the 'no action alternative' because the Project would result in loss of hundreds of acres of public land habitat for animals which are either federally protected, or the Fish and Wildlife Service is struggling to avoid listing, most notably, bighorn sheep, greater sage grouse, burrowing owl and golden eagle. Much of this habitat is located within the renowned Snake River Birds of Prey NCA (the "SRBOP NCA"), which is a unit of the BLM's National Landscape Conservation System ("National Conservation Lands"). Section 32 of the Federal Lands Policy and Management Act of 1976 (FLPMA) explicitly provides for managing areas like the NCA according to their enabling statute, stating: "The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 202 of this Act when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." (43 U.S.C. 1732(a)) (emphasis added). Here, the BLM is legally required to manage the NCA for the "protection, maintenance, and enhancement of raptor populations and habitats" and "the natural and environmental resources and values associated therewith, and of the scientific cultural, and educational resources and values." 16 U.S.C § 460iii-3(b)(7) (the "SNBOP NCA Enabling Act"). It is unclear whether these impacts could be mitigated, but it is abundantly clear that even the BLM is concerned that the mitigation plan submitted lacks details or specifics and "is not adequate in the form submitted as part of the Revised POD for the Project." (DSEIS 2-62).	We are not aware of any statutory authority that requires BLM deny the Gateway West Transmission Line Project in Idaho out of hand. The BLM is completing this analysis to support the decision on whether to authorize a ROW grant across federal land or deny the application.
101658	(xxxix)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	FLPMA requires that "[i]n managing the public lands the Secretary [of the Interior] shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b) (emphasis added). Clearly, the Project will cause severe degradation of public land habitat for protected and sensitive species including lands for which BLM's stewardship obligations are heightened under 43 U.S.C. 1732(a), the SNBOP NCA Enabling Act, and more recent guidance regarding management of the BLM's National Conservation Lands, (including Secretarial Order 3308, stating, "BLM shall ensure that the components of the [National Conservation Lands] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.").	Comment noted. See the previous response.
101658	(xl)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Most egregiously, the Project's harm to public lands and public trust resources is both completely unnecessary and undue, as the SDEIS fails to show the Project is needed or beneficial by any measure. Indeed, the SDEIS fails to consider changes to critical factors affecting the Western grid, namely decreased peak demand expectations and further grid integration among service territories, which make the Project completely unnecessary.	The BLM's Purpose and Need (described in Chapter 1) does not including determining whether the proponents are correct in believing that the project is needed to upgrade the reliability of the power grid and/or to meet the needs of their customers. The BLM has no expertise in these matters.
101658	(xli)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	As explained in greater detail in the attached Synapse Economics analysis entitled 'Comments on the Gateway West Draft Supplemental Environmental Study' ("Synapse Report")(Exhibit 'A'), the SDEIS relies on woefully outdated information and inaccurately states that electric demand is rapidly increasing, while ignoring the existence of other transmission projects moving forward which have been shown to address any demand more economically. Conversely, there is no dispute that demand for PacifiCorp and Idaho Power ("proponents") is either flattening or contracting, as shown in the proponents' most recent planning documents. The only modeling test of the Project showed that the Project was not cost-effective relative to other options, and the proponents have not independently done any analysis to show the Project is needed. Thus there is no evidence, either in the SDEIS, or from any other entity that the Project is needed.	The BLM's Purpose and Need (described in Chapter 1) does not including determining whether the proponents are correct in believing that the project is needed to upgrade the reliability of the power grid and/or to meet the needs of their customers. The BLM has no expertise in these matters.
101658	(xlii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Given the complete absence of evidence showing that the project is needed, the BLM must choose the 'no action alternative' for these expensive and unnecessary transmission line segments. Although a 'no action alternative' was included, it was dropped from consideration without any real analysis because "the demand for electricity, especially for renewable energy, would continue to grow in the Proponents' service territories. If the No Action Alternative is implemented, the demand for transmission services, as described in Section 1.4, Proponents' Objectives for the Project, would not be met with this Project and the area would have to turn to other proposals to meet the transmission demand." (DSEIS 3.9.4, repeated throughout 3.9). As explained in more detail below, and in the attached Synapse Report, demand for electricity is dropping in the proponent's service territory, and therefore, choosing the 'no action alternative' is the only NEPA alternative in the DSEIS that is justified based on the evidence in the record.	Comment noted. See the previous response.

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101658	(xliii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Even assuming there was an increase in demand, and there is not, there are numerous other transmission proposals and changes to the Western grid moving forward which could address any future demand. In November 2014 Pacificorp and CAISO formed the western Energy Imbalance Market (EIM) and since then it has been joined by Puget Sound Energy, Portland General Electric, and others with Idaho Power intending to join by 2018. The companies claim this coordination would facilitate increased reliability for the electric system.	Comment noted. Other foreseeable projects are discussed in Chapter 4.
101658	(xliv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	There are also additions to the transmission system that were not accounted for including the Southwest Intertie Project (SWIP) North and One Nevada line, as well as the proposed Boardman to Hemingway project in Oregon, particularly if it re-aligns with West-Wide Energy Corridor 250-251 along Interstate 84. Because the no action alternative was not truly considered, the SDEIS violates NEPA, which requires that a reasonable range of alternatives to the proposed project be considered in the environmental review process, including a no project alternative. 42 U.S.C. § 4332; 40 C.F.R. §§ 1502.14, 1508.25(b). (Indeed, the range of alternatives analysis is the "heart of the environmental impact statement." 40 C.F.R. §1502.14.)	Comment noted. The Boardman to Hemingway project may or may not be approved. No decision on that project has been made. Assuming that is will be approved is conjecture.
101658	(xlv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	In addition, FLPMA requires that "[i]n managing the public lands the Secretary [of the Interior] shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b) (emphasis added). Recent authority and guidances continue to emphasize BLM's obligations to avoid harmful impacts to lands, wildlife and other natural resources also justify BLM's choice of the 'no action alternative.' Indeed, the recent Presidential Memorandum, Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment, affirms that "It shall be the policy of the Department[] of … the Interior, … to avoid and then minimize harmful effects to land, water, wildlife, and other ecological resources (natural resources) caused by land- or water-disturbing activities." The proposed rule recognizes that "avoiding impacts" is the first and most important step in the "mitigation hierarchy," 81 Fed. Reg. at 9686, id. at 9725 (proposed 40 C.F.R. § 1601.0-5).	The BLM fully intends to avoid, minimize and restore as directed. If the authorized officer cannot conclude that this can be accomplished the project would not be approved
101658	(xlvi)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	In this instance, BLM has flipped its obligation to take any action necessary to avoid harm to ecological resources, and instead focused on avoiding harm to private landowners and their property values. Indeed, the DSEIS is clear that 'conflicts with agricultural lands, residential developments' and consideration of impacts to communities, agriculture and private property, were much of the motivation behind the Segment 8 Revised Proposed Route. (DSEIS ES-5)	The SEIS considers impacts to people, including residents and farms, as well as to wildlife, scenery, soils, vegetation, and many other factors.
101658	(xlvii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	These same factors, together with the desire to avoid greater sage grouse grouse leks and priority habitat, drove the revisions to Segment 9. (DSEIS ES-6). As the DSEIS notes, "(S)iting preference on public versus private lands is an important issue for Segments 8 and 9. " (DSEIS 2-29). While we acknowledge that BLM prioritized avoiding sage-grouse priority habitat by routing Segment 9 through the SNBOP NCA (DSEIS ES-6), the same objective could have been achieved by using private property instead and thereby also avoiding impacts to the NCA. The BLM is under no obligation to facilitate unneeded transmission lines on public lands and therefore should have a) left it to the proponents to resolve issues with private landowners or b) chosen the no-action alternative as we recommend.	It is correct that the BLM looked for ways to minimize impacts to sage-grouse, private landowners, the NCA, and many other resources and values. That is our responsibility under the law.
101658	(xlviii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	BLM's FLPMA requirement to avoid impacts to ecological resources is heightened in this instance as the Project goes through the ecologically invaluable SNBOP NCA, which BLM is required to manage for the specific use it was dedicated for (43 U.S.C. 1732(a)). In this instance, Congress established the NCA specifically "to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area" (Section 3(a)(2) of P.L. 103-64 [1993]). More recently, BLM Policy Manual 6220 sets specific guidance for BLM concerning the granting of new rights of ways through units of the National Conservation Lands, which is discouraged. Here, the unacceptable impacts to wildlife and their habitat can easily be avoided with the 'no action' alternative.	See the response to the previous comment.
101658	(xlix)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	The BLM must weigh the lack of any demonstrated need for this project against its harm to natural resources and public lands. Federal agencies have the right to deny projects when the project proponents have not demonstrated need, particularly when the project would cause harmful effects. Indeed, earlier this spring, the Federal Energy Regulatory Commission (FERC) denied the Pacific Connector Pipeline based on adverse impacts coupled with little demonstrated need. FERC's decision	Please see our response to you previous comments on the need for the project.

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			was clear that the record before FERC did not show that the pipeline's purported need and benefits outweighed the "adverse effects on landowners." (Jordan Cove Energy Project, LP, 154 FERC ¶ 61,190 (March 11, 2016)). "The more adverse impact a project would have on a particular interest, the greater the showing of need and public benefits required to balance the adverse impact," the FERC said in its order. Id. The company showed "little or no evidence of the need" for the Pacific Connector pipeline considering the companies had not conducted an open season for capacity on the system and did not have contracts for it, the FERC said. Notably, FERC made this important distinction even though it is not subject to BLM's requirements under FLPMA to 'avoid undue or unnecessary degradation of natural resources'; its heightened management duties to the SNBOP NCA under FLPMA and the SNBOP NCA Enabling Act; and further BLM's guidelines on managing the National Conservation Lands.	
101658	(I)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	In addition to harm to public lands, wildlife and other natural resources, the Project would impact air quality. These harmful impacts were ignored in both the DSEIS and the predecessor FEIS. The overall Gateway West project is 1,000 miles long and is supposed to reinforce the existing transmission interconnection that exists between Wyoming and Idaho, and move resources to markets on the west coast, via a path through Idaho. While the proponents have not demonstrated that the project is needed or beneficial, its presence would certainly affect utilization of energy resources in the region. For instance, the eastern portions of the project are directly tied to the Jim Bridger and Dave Johnston coal plants, providing easier access to markets for those plants. This means that coal generation could increase in the region as a result of the project. This would lead to increased air emissions and related health effects. However, the proponents have neglected to evaluate the impacts on those plants' generation and the related environmental impact of that generation once the project is in place. In responding to this concern raised in the FEIS, the proponents stated that "coal plants are not part of the Project or connected actions and therefore they are not included in the analysis." (FEIS, Appendix L, page L-33). BLM must analyze "the whole of the action" under NEPA. A significant expansion of a major transmission path from the PacifiCorp east to PacifiCorp west region will result in increased coal-fired generation to flow onto the grid and, in turn, related impacts to air quality as a result of that increased coal firing.	Air quality is addressed in Section 3.20 of this document and of the 2013 FEIS.
101658	(Ii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	B. Because neither the "purpose and need" section of the DSEIS nor recent relevant planning documents demonstrate any need or benefits for the Gateway West project, the Project's clear environmental harms outweigh the benefits.	Please see our response to you previous comments on the need for the project.
101658	(Iii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	The SDEIS relies on stale data which resulted in excessively high peak demand forecasts. The "purpose and need" section of the DSEIS cites data from PacifiCorp's 2011 IRP and Idaho Power's 2011 IRP, both of which were outdated even when the FEIS was published, as both utilities constantly update the information in their IRPs. Much has changed since the 2011 IRPs were filed—namely both companies' demand expectations have markedly decreased. The DSEIS tried to justify the project by discussing increasing demand for both companies' systems. However, the proponents of Gateway West have significantly lowered their peak demand expectations in recent years. Despite this fact, the DSEIS continues to rely on five-year-old, inflated forecasts that have no bearing on current circumstances. For both utilities, the DSEIS is relying on data from 2011 forecasts. The most recent demand forecast from PacifiCorp's 2015 IRP Update predicts peak demand that is 15 percent lower than the data cited in the DSEIS for 2020.[1] Indeed, PacifiCorp does not expect to meet the level of peak demand cited in the DSEIS anytime in the near future. The 2015 IRP update predicts that, when demand-side management (DSM) is accounted for, demand will contract between now and 2025 in most states in its territory. Indeed, PacifiCorp's expected peak demand is approximately 2.5 GW lower than predicted in 2011--a divergence that is almost twice the carrying capacity of the Gateway West project itself. The DSEIS also refers to predicted demand growth in Idaho Power's 2011 IRP. As shown in the attached Synapse Report, as with PacifiCorp, Idaho Power's peak demand expectations have decreased significantly. Predicted peak demand in 2020 is 9 percent lower than was expected in 2011 (3,615 MW compared to 3,973 MW).	Please see our response to you previous comments on the need for the project.
101658	(Iiii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	The DSEIS relies on information prepared by the Northern Tier Transmission Group (NTTG) in 2007 to justify any need for the project. BLM ignored recent NTTG Regional Transmission Plan findings that exclude Gateway West segments 8 and 9.3 NTTG's analysis showed that with the Boardman to Hemingway project2 and other alternative segments in place, reliability is ensured at lower cost with a plan that excludes Gateway West and Gateway South. Therefore, according to NTTG the Gateway	Please see our response to you previous comments on the need for the project.

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			projects are unnecessary and not cost-effective. The presence of other planned transmission projects calls into question any need for Gateway West segments 8 and 9. BLM cannot finalize a NEPA document for this proposed project absent this critical timely analyses.	
101658	(liv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	As with other critical information, the DSEIS is so outdated that it ignores recent ways in which the energy system in the West has changed significantly. The proponents of Gateway West must consider such changes as well as other planned transmission projects that may obviate the need for Gateway West. As noted, the NTTG 2014D2015 Regional Transmission Plan found that an alternative plan that consisted of the Boardman to Hemingway line and several smaller upgrades produced a more efficient and cost- effective plan than one that included the Gateway West project. Again, the NTTG's most recent published regional transmission plan found no need for the Gateway West project. The BLM cannot ignore the multitude of planned transmission projects in the region-- including those under permitting by the BLM, and proposed by the proponents. These lines include: Gateway South (BLM, proposed by Pacificorp), Boardman to Hemingway, Southwest Intertie Project North and the One Nevada Line. [3]	Please see our response to you previous comments on the need for the project.
101658	(lv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	C. BLM must deny the project based on its heightened management obligations to manage lands within the SRBOP NCA.	The SEIS is analyzing impacts to the SRBOP and evaluating if impacts that cannot be avoided can be mitigated. The BLM will not approve crossing the NCA unless it believes that it can meet the requirements of the enabling legislation and other laws, policies, and regulations.
101658	(lvi)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	As discussed above, BLM must deny the project under FLPMA. The Project's harmful impacts to BLM managed resources clearly outweigh any purported and unsubstantiated need. BLM's obligations to reject the Project under FLPMA are even greater here because the majority of the Project is proposed within the SNBOP NCA, a part of the National Conservation Lands. The National Conservation Lands--often referred to as BLM's 'crown jewels'--are BLM-managed lands which "have been set aside specifically for conservation, preservation and restoration." "To be a component of the National Conservation Lands, a unit must have been designated for protective and conservation purposes by the Congress or President. "(Idaho National Landscape Conservation System Conservation Strategy, 2011-2015 'The Geography of Hope,', page 1).	See the response to the previous comment.
101658	(lvii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	I. The Project violates BLM Policies on transmission in National Conservation Lands units BLM's own policies direct against new transmission in National Conservation Lands units. BLM Policy Manual 6220 sets specific guidance for BLM concerning the granting of new rights of ways through units of the National Conservation Lands. In fact, it creates a presumption that BLM will not approve new rights-of-ways in National Monuments and National Conservation Areas. The manual states: "To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designating or authorizing use of transportation or utility corridors within Monuments and NCAs. To that end, and consistent with applicable law, when developing or revising land use plans for Monuments and NCAs, the BLM will consider: a. designating the Monument or NCA as an exclusion or avoidance area; b. not designating any new transportation or utility corridors within the Monument or NCA if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the Monument or NCA was designated; c. relocating any existing designated transportation and utility corridors outside the Monument or NCA; "(BLM Manual 6220).	See the response to the previous comment.
101658	(lviii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Rather than revising relevant land use plans to relocate transmission lines or exclude transmission lines, "the SNBOP RMP would need amendments to allow the project in the Cove non-motorized area, to change VRM Class II areas to VRM Class III and allow a crossing of the Oregon Trail, to permit surface-disturbing activity within 0.5 mile of sensitive plant habitat, to cross outside of existing utility corridors within the SNBOP NCA, and to allow the Project within the C.J. Strike and Snake River SRMAs." (DSEIS 2-16). These amendments are in direct contravention of the BLM's obligations for management of the SNBOP NCA.	Your comment that the BLM is not meeting its obligations because it is considering RMP amendments is noted. As stated in response to a similar comment above, amending RMPs is consistent with FLPMA.

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101658	(lix)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	II. The Project violates the SNBOP NCA enabling statute The Project violates the SNBOP NCA enabling statute. The SNBOP NCA enabling statute (P.L. 103-64), states the "(S)ecretary shall allow only such uses of lands in the conservation area as the Secretary determines will further the purposes for which the Conservation Area is established." Therefore, BLM must demonstrate that any proposed use within the SNBOP NCA meets the purpose for which the SNBOP NCA was established. Congress established the SNBOP NCA "to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area" (Section 3(a)(2) of P.L. 103-64 [1993]). Therefore, "(T)o authorize a Right-of- Way (ROW) under FLPMA through any portion of the SNBOP NCA, the BLM must demonstrate that: 1) the use is compatible with the enabling statute of SNBOP NCA; 2) impacts to the SNBOP NCA have been avoided or minimized to the greatest extent possible; and 3) enhancement will result in a net benefit to the SNBOP NCA for the duration of the ROW permit (BLM 2008a)."(DSEIS 2-16).	The SEIS is analyzing impacts to the SRBOP and evaluating if impacts that cannot be avoided can be mitigated. The BLM will not approve crossing the NCA unless it believes that it can meet the requirements on the enabling legislation and other laws, policies, and regulations.
101658	(lx)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	a. The BLM has not shown the Project could be compatible with the purpose of the SNBOP NCA The Project would clearly be incompatible with the purpose of the NCA as the Project will harm raptor habitat and disturb raptors, the core reason the SRBOP NCA-- which has the highest concentration of raptors in the United States--was included as part of the National Conservation Lands system. The harm to raptors is equal, or in the case of Proposed Alternative 9, much greater than the action alternatives considered in the DSEIS, and clearly much more than the 'no action alternative.' Indeed, as shown on Figure E. 10-3, because it goes inside the SRBOP NCA, the DSEIS Revised Proposed Route Segment 9 alternative would cause devastating impacts to raptor nests--causing disturbances within one mile for an extremely high number of raptor nests, 963 (as compared to 306 for FEIS proposed 9, 284 for for SEIS Route 9 K, and 10 nests for SEIS Toana Variations 1 and 1-A). (DSEIS Table 2.7.2) SDEIS Section 3.11 does not describe how many of these nests are likely to be destroyed by construction or removed due to the proposed removal of existing lines, but does acknowledge that both construction and operations could lead to nest abandonment and habitat loss. As noted in the Gateway West FEIS, the project will not be in conformance with the Green River RMP which prohibits "permanent and high profile structures" within an "appropriate distance of active raptor nests" which is usually "less than ½ mile" (FEIS 3.10.2). The Rawlins RMP has a similar requirement. Potentially impacting 963 raptor nests within 1 mile of the Project certainly violates the Green River and Rawlins RMPs' goals to protect raptor nests from disturbance, and the SRBOP NCA's goals of protecting raptor habitat, particularly given the inadequacy of the MEP.	The DSEIS did not conclude that any of the routes are consistent with the purposes of the NCA. Additional information is included in this document. An EIS is not a decision document. Any finding on compatibility would be made in a ROD.
101658	(lxi)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Because the SDEIS omits a meaningful analysis of impacts to raptors and their habitat, the BLM cannot determine whether the Project could be considered compatible. Despite the fact that the purpose of the DSEIS is to analyze the impacts of routing the line through the SNBOP NCA, there are no new surveys or other analyses of raptors, migratory birds, sage grouse, making any compatibility analysis impossible on this record.	Impacts to raptors and their habitats is presented in Sections 3.10 and 3.11. We do not agree that any pertinent information on potential effects to raptors has been omitted.
101658	(lxii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Instead, the DSEIS seems to base its compatibility analysis on an erroneous assumption that "transmission lines do not adversely affect and apparently enhance the raptor and raven populations" (MEP-31). This assumption is not supported in the record. Transmission lines can provide perching and nesting sites under certain conditions but they also introduce electrocution and collision dangers into habitat. The DSEIS's Migratory Bird and Raptor analysis disregards over a decade of peer-reviewed studies and papers, including many by the Fish and Wildlife Service, showing that raptors and migratory birds suffer great mortality from transmission line electrocution.[4] Instead, BLM appears to rely on a single, scientifically questionable study which drastically undervalued the harm to birds from wind energy. Despite the wealth of studies and papers developed by federal agencies such as the Department of Energy, the United States Geological Survey, the Fish and Wildlife Service, and BLM itself looking at wind and avian mortality, the DSEIS states that "no known monitoring at either wind farms or at transmission line locations is being conducted" (DSEIS 4-40), and that "thirty (230)- kV and 500-kV transmission lines, such as those proposed by Gateway West and others, offer a negligible electrocution hazard to birds" (Erickson et al. 2005) (DSEIS 4-40). Again, such assertions are refuted by the record.	The SEIS discloses that transmission lines have both beneficial and negative effects on birds. On the one hand there are studies that support the position that by providing nest and roosting structures the transmission line benefits raptors. On the other hand, raptors and other birds fly into lines and structures, causing injury and mortality.as in most things, there is no simple, clear-cut answer. The BLM needs to weigh the benefits and impacts of the line on raptors, as well as on other resources and values. This is made clear in the SEIS.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101658	(lxiii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	b. The BLM has not shown that impacts to the SNBOP NCA have been avoided or minimized to the greatest extent possible. The SNBOP NCA enabling statute requires the BLM to show that "impacts to the SNBOP NCA have been avoided or minimized to the greatest extent possible…." (DSEIS 2-16). The preferred Segment 9 would harm raptors (the specific resource for which the NCA was designated) more than any other routing, devastating 963 nests within one mile, 90 times more nests than for the 'Toana' alternatives. (DSEIS-Table 2.7.2). Rather than avoiding or minimizing impacts to the NCA, BLM is proposing to exacerbate them.	This is correct, the DSEIS is one step in the NEPA process, not a final determination one way or the other.
101658	(lxiv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	c. BLM has not shown that proposed "mitigation and enhancement" will result in any benefit to the SNBOP NCA. BLM has not met its standard of proving "that any proposed mitigation and enhancement measures would result in a net benefit to the SNBOP NCA for the duration of the ROW permit (BLM 2008a)." (DSEIS 2-16). Indeed, the BLM correctly found that the proponents' mitigation and enhancement package (MEP) is deficient: "The lack of details or specifics in the MEP makes it unclear how the proposal's goals would be achieved. Most importantly, the MEP does not contain a methodology and a reliable, consistent, and repeatable accounting system to determine the expected impacts of actions and the measures necessary to compensate for those impacts based on a common "currency" (i.e., raptor habitat value per acre). Therefore, it is not adequate in the form submitted as part of the Revised POD for the Project." (DSEIS 2-62) We agree, and note that these mitigation and enhancement measures are so vague and speculative as to be insufficient to qualify as the reasoned discussion required by NEPA.	The BLM is not planning to use the Proponents' MEP, for the reasons disclosed in the DSEIS. See the mitigation framework in Appendix K of this document. We have not determined in any of the proposed routes are compatible with the requirements on the NCA. The DSEIS is one step in the NEPA process, not a final determination one way or the other.
101658	(lxv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	The proposed mitigation measures for vegetation in the project area are a good example of the vagueness and other flaws in the MEP. The quantitative impact to vegetation types is vague and poorly defined by using subjective terms including "very little" and "vast majority" (MEP- 24), rather than including metrics so that the amount of disturbance of vegetation types is clearly identified.	The BLM is not planning to use the proponents' MEP, for the reasons disclosed in the DSEIS. See the mitigation framework in Appendix K of this document.
101658	(lxvi)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Additionally, the document uses the term "disturbed," yet provides no definition of "disturbed." Different levels of human disturbance allow for different levels of use, and often dictate the wildlife that is present in the areas. Lumping differing levels of human disturbance as "disturbed" greatly disadvantages the opportunities for enhancement and improvement, because heavily "disturbed" areas will require much greater effort and resources to improve, while lightly "disturbed" areas are likely to have much more successful improvements. possibly with fewer efforts/resources. Differing levels of disturbance must be defined quantitatively by cover of the desired plant community.	Comment noted.
101658	(lxvii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	The proposal to increase habitat functionality from the existing "baseline" by an increment based on the NRCS system of "States" is likewise inadequate--firstly, no quantitative baseline has been identified, and secondly, mitigation should be based on the impacts from the project, where some key resources (raptor and sage-grouse habitats respectively) may have a higher priority than others. Additionally, while it is important to implement the reclamation and noxious weed plans, this measure is an avoidance measure for creating additional impacts from the proposed project, not a mitigation measure to offset impacts from the project to the existing vegetation and habitats.	The BLM is not planning to use the Proponents' MEP, for the reasons disclosed in the DSEIS. See the mitigation framework in Appendix K of this document.
101658	(lxviii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	With regard to the federal candidate species, the slickspot peppergrass, the document states "the Project will implement routing and siting measures and environmental protection measures to minimize impacts to and largely avoid slickspots." While it is important to avoid impacts to the habitat of the peppergrass, the plan fails to disclose the routing and siting measures and environmental protection measures to avoid the slickspot habitat.	This is not correct. See TESPL-4 in Section 3.7.2.5 and other EPMs designed to protect sensitive plants, as well as the discussion on slickspot peppergrass in Section 3.7.2.2.
101658	(lxix)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Because the MEP is inadequate, BLM commits to work with stakeholders to identify impacts and design their own mitigation plan to address remaining impacts, enumerating categories of mitigation measures which could be applied, and including a 'conceptual mitigation model.' (DSEIS 2-63, DSEIS Appendix K). However, these efforts likewise inappropriately defer consideration of mitigation that properly belongs in NEPA. NEPA requires that federal agencies discuss mitigation measures in an Environmental Impact Statement (EIS).(40 C.F.R. §§ 1502.14, 1502.16.) Under NEPA, agencies must "analyze the mitigation measures in detail [and] explain how effective the measures would be . . . A mere listing of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA." (Nw. Indian Cemetery Protective Ass'n v. Peterson, 764 F.2d 581, 588 (9th Cir. 1985), rev'd on other grounds, 485 U.S. 439 (1988). CEQ's National Environmental Policy Act Regulations,; Davis v. Mineta, 302 F.3d at 1125.)	The BLM continues to work on the mitigation strategy, see the additional information in Appendix K. A final decision on mitigation will depend on which alternative, if, any is selected and on the final design of that line. Avoiding impacts during the design phase would be the optimum method of protecting the resources and values of the NCA.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101658	(lxx)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	The overall environmental impacts of the Gateway West Project cannot be adequately evaluated or considered in the DSEIS without evaluating the actual details of the proposed compensatory mitigation plans for the SNBOP NCA and other resources. Despite the BLM's post-approval promises to address the glaring deficiencies in the plans submitted by the proponents, these efforts are not adequate. Finally, such vague and poor mitigation efforts directly contravene the recent Presidential Memorandum, Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment, and the Department of the Interior's Landscape-Scale Mitigation Manual (2015) which each emphasize both the central role of mitigation, while also emphasizing the importance of avoidance of adverse effects as the most important form of 'mitigation.'	Comment noted.
101658	(lxxi)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Lastly, the measures that are clear (such as the mitigation compensation ratio) are insufficient in proportion to the impacts to the NCA, and the habitat and special status species within the NCA. For example, the proponents proposed a 1:1 mitigation ratio for terrestrial impacts in the SRBOP NCA, for restoration work. The document fails to recognize that the NCA is irreplaceable and requires that acquired mitigation lands must be habitat for the impacted species. Because any acquired or restored habitat is likely already inhabited by the same species for which mitigation is sought, this mitigation strategy ensures a net decrease in habitat for impacted species. To provide mitigation that reduces species' habitat loss, mitigation ratios must meaningfully address the impacts to each species and must be high enough to fully mitigate the impacts to those species. (Moilen et al. 2009, Norton 2009) A minimum 2:1 mitigation should be required for development in the NCA and sage grouse habitat. Additionally, while law enforcement is key to protecting the values within the NCA, limiting it to 10 years is insufficient. If this were sufficient, there would be no need for any law enforcement after 10 years anywhere– clearly an unrealistic proposition. Support for law enforcement needs to be in perpetuity. In addition, it is not the access road alone that needs to be mitigated through law enforcement patrols, but the access that the road provides to offsite areas that would now be much more accessible. Therefore a full time law enforcement officer would need to be funded in perpetuity.	The BLM continues to work on the mitigation strategy, see the additional information in Appendix K. A final decision on mitigation will depend on which alternative, if, any is selected and on the final design of that line. Avoiding impacts during the design phase would be the optimum method of protecting the resources and values of the NCA.
101658	(lxxii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Based on the foregoing,the Project cannot be found to ' mitigate and enhance' the values of the NCA.	Comment noted, see the response above.
101658	(lxxiii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	E. The SDEIS violates NEPA. Ignoring new information which would avoid harm violates FLPMA, and using stale, outdated and incorrect information violates BLM's requirements under (NEPA) to provide accurate information on which to base 'informed decision-making to the end that the agency will not act on incomplete information, only to regret its decision after it is too late to correct.' As discussed above and in the Synapse Report, the purpose and need for the project relies on clearly outdated information, some of which is five years old or greater.	The SEIS is fully consistent with NEPA.
101658	(lxxiv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	The DSEIS omitted recent information showing the proponents' demand growth is flat or falling. This omission is carried through to the cumulative impacts analysis, which excludes a number of other proposed transmission projects, including many with completed or near completed permitting from BLM, such as: the Transwest Express project, ONline, and even a project proposed by Pacificorp, such as the Gateway South, (which had a final EIS released earlier this year). There are numerous other flaws in the cumulative effects analysis. Notably, the BLM considered only the three coal-powered plants within the state of Idaho in its cumulative effects analysis. (DSEIS 4-16), and did not consider the coal and gas fired generation which is likely to come online or stay online as a result of the Project.	The BLM's Purpose and Need (described in Chapter 1) does not including determining whether the proponents are correct in believing that the project is needed to upgrade the reliability of the power grid and/or to meet the needs of their customers. The BLM has no expertize in these matters.
101658	(lxxv)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Relying on inaccurate information additionally violates NEPA by precluding the range of alternatives truly considered in the DSEIS. NEPA requires that a reasonable range of alternatives to the proposed project be considered in the environmental review process, including a 'no project alternative.' 42 U.S.C. § 4332; 40 C.F.R. §§ 1502.14, 1508.25(b). Indeed, the range of alternatives analysis is the "heart of the environmental impact statement." 40 C.F.R. §1502.14.	The BLM's Purpose and Need (described in Chapter 1) does not including determining whether the proponents are correct in believing that the project is needed to upgrade the reliability of the power grid and/or to meet the needs of their customers. The BLM has no expertize in these matters.
101658	(lxxvi)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	In this instance, as discussed above, although a 'no project alternative' was included, it was dropped from consideration, because: "The demand for electricity, especially for renewable energy, would continue to grow in the Proponents' service territories"(DSEIS 3.9.4, repeated throughout). As explained above, this statement regarding demand growth is erroneous, and this critical error is harmful, as it would cause BLM to approve a project which is harmful to lands, air and wildlife.	The No Action Alternative was not dropped, it is considered in each Section of Chapter 3.

Letter and Comment Nos.		Organization/Individual	Comment	Response
101658	(lxxvii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	As the 9th Circuit recently stated in Oregon Natural Desert Ass'sn v. Jewell, 2016 WL 3033674 United States Court of Appeals, Ninth Circuit(holding that BLM's review did not adequately assess baseline sage grouse numbers during winter at the proposed Echanis wind energy facility, and that BLM's error was not harmless) "deference does not excuse the BLM from ensuring the accuracy and scientific integrity of its analysis, a NEPA requirement," and that "inaccurate information and unsupported assumption materially informed decisionmaking and public participation." (Id, 16)	Comment noted.
101658	(lxxviii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	As noted in the NGO DEIS Comments, and comments by other stakeholders, there were serious flaws in both the BLM's analysis of habitat for sage grouse habitat and other wildlife. Not only were these comments not addressed, but that data is is now additionally quite stale. Similarly the analysis relies on outdated and stale information, ignoring relevant new information. Although the proponents and BLM have proposed measures to address impacts, "mitigation measures however, while relevant to the adequacy of an environmental analysis… are not a panacea for inadequate data collection and analysis." (Id, at 17)	The HEA for sage-grouse is a science-based assessment completed in cooperation with the USFWS and Wyoming and Idaho state biologists. We are not aware of a better method for assessing impacts across such as vast area, over 7 million acres.
101658	(lxxix)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Strangely, the 'co-preferred alternatives appear to be the most harmful alternative in terms of wildlife impacts' [5] (DSEIS Table 2.7-1, 2.7-2), particularly when compared with the 'Toana' alternatives, which appear to have been rejected because they would cross greater amounts of private land.	The Toana Road variation 1 is included in both the DSEIS co-preferred alternatives, as noted in Section 2.3.4.1 and 2.3.4.2 of the DSEIS. Your comment that the co-preferred alternatives would have the greatest effects on wildlife is noted.
101658	(lxxx)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	With respect to greater sage grouse, although the Project is exempted from greater sage grouse planning efforts, it is well-known that transmission lines harm greater sage grouse. (As an example, the Final Environmental Impact Statement and Proposed Land- use Plan Amendments for the Energy Gateway South Transmission Project includes an extensive review of the many direct and indirect impacts on sage-grouse of constructing major transmission lines in essential habitat [EGSTP FEIS: 3-170 – 3-382]).	We do not dispute that transmission lines has adverse effects on sage-grouse. Effects to sage-grouse is discussed in Section 3.11.
101658	(lxxxi)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Although Proposed Alternative 9 seems to be routed in part to avoid proximity to sage grouse leks, it still impacts a substantial amount of sage grouse preliminary priority habitat. Indeed, SEIS Revised Proposed Route Segment 9 would impact 282 acres of sage grouse Preliminary Priority Habitat (PPH), while SEIS Revised Route Segment 8 would impact 29 acres of sage grouse PPH habitat (DSEIS Table 2.7.2).	The numbers in your comment are not correct. Table 2.7-2 presents impacts for segment 9, not segment 8.Table 2.7-1 covers segment 8, it states that the Revised Proposed Route in segment 8 would impact 129 acres of PPH and route 8G would impact 103 acres. Table 2.7-2 states that the revised proposed route for segment 9 would impact 282 acres of PPH, FEIS Proposed 9 would impact 292 acres and 9K 386. None of the routes would cross Priority Habitat Management Areas for sage-grouse. See Tables D.11-13 and -14.
101658	(lxxxii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Finally, the BLM did not include a preferred alternative. instead the SEIS 'co- preferred alternatives' as well and shifted between different names for alternatives throughout different sections of the document. The BLM made an already confusing document unintelligible for all but the bravest readers. BLM's planning regulations dictate that the agency evaluate the range of alternatives and then "develop a preferred alternative… (which) shall be incorporated into the draft plan and draft environmental impact statement." 43 C.F.R. § 1610.5-7. The need to identify a preferred alternative in a draft RMP amendment is reiterated in BLM's Land Use Planning Handbook (H-1624-1), which explicitly requires that the agency develop a preferred alternative in the context of plan revisions and amendments. The purpose of the preferred alternative is to improve public participation by identifying the "lead agency's orientation," which allows interested stakeholders to comment most effectively. See, Council on Environmental Quality's (CEQ) NEPA's Forty Most Asked Questions. Here, BLM has identified Alternatives 2 and 5 as "co-Preferred Alternatives" instead of identifying a Preferred Alternative for the route of the Gateway West Transmission Line. Because these co- preferred alternatives each have very serious impacts to different natural resources, BLM has undermined the opportunity for meaningful public input by presenting two alternatives with fundamentally different approaches without indicating how they might be further evaluated.	This is correct—the BLM identified two alternatives that it prefers. It did not suggest that either of these alternatives is without issues. It has included two new variations in this FSEIS in order to determine if additional impacts can be avoided or minimized. Below is the authority for one or more preferred alternatives from the CEQ federal regulations: 40 CFR 1502.14 Alternatives including the proposed action. In this section agencies shall: (e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.
101658	(lxxxiii)	DEFENDERS OF WILDLIFE,SIERRA CLUB,ELIZA CAVA,SARAH FRIEDMAN	Conclusion: The harm the Project would cause to ecological resources, including habitat for which the BLM has a heightened obligation, outweigh the nonexistent purported benefits and need. BLM has the statutory authority, and obligation, under FLPMA to deny the Project and choose the 'no action' alternative. Sierra Club and Defenders of Wildlife therefore respectfully request that the BLM not issue a right-of-way for this project.	Your request is noted.

Appendix M

Environmental Protection Measures

GATEWAY WEST TRANSMISSION LINE PROJECT ENVIRONMENTAL PROTECTION MEASURES

Table M-1 below describe the measures the Proponents (Idaho Power and Rocky Mountain Power) have committed to implement to ensure environmental protection during construction, operation, and maintenance of the Gateway West Transmission Line Project. These environmental protection measures (EPMs) are taken from Appendix Z to the Plan of Development (POD) attached to the 2013 Record of Decision (ROD) for Gateway West. The Proponents will be responsible for ensuring their contractors and employees implement these measures.

CONTENTS

Table M-1 is divided into eight columns as follows:

- **Column 1:** This column contains the EPM number agreed to between the Proponents and the Bureau of Land Management (BLM) to allow for a clear and consecutive presentation of EPMs by resource.
- **Column 2:** A description of the EPM that will be implemented during design, construction, operations, and/or maintenance. These EPMs become part of the Project as proposed by the Proponents.
- **Columns 3–5:** These columns serve as a guide to the phases of the Project for which the EPM is most applicable: design and engineering; construction; or operations and maintenance. EPMs indicated as only applicable to construction may also be applicable to operations and maintenance projects that involve ground disturbance.
- **Columns 6–8:** These columns identify where the EPM is proposed to be applied by the Proponents based on ownership. In addition, the Proponents propose to apply the EPMs more broadly for certain segments based on land pattern characteristics.

In Idaho, EPMs will be applied based on ownership as identified in the table below, except as follows:

- Proposed transmission line substation and regeneration sites located on private land, unless they are standard EPMs of the Proponents; and
- Private property, if different practices are requested by the property owner and do not violate the law.

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
OPERATIONS AND MAINTENANCE							
G-1	Resource Management Plan (as amended) design criteria, Best Management Practices (BMPs), and mitigation requirements will apply on BLM-managed lands.	•	•	•	•		
G-2	Forest Plan Standards and Guidelines (as amended) will apply on National Forest System (NFS) lands. Ground-disturbing and vegetation management activities will comply with all Agency-wide, regional, and state BMPs.	•	•	•	•		
G-3	Third-party Environmental Compliance Inspection Contractor (CIC) Monitors approved by the Agencies will monitor construction activities. Monitoring activities will be structured in accordance with the Environmental Compliance Management Plan included as Appendix C of the Plan of Development.		•		•		
G-4	All wildlife and plant surveys/preconstruction surveys will be considered as “casual use” activities and will not be restricted or prevented to occur due to overlapping season and temporal restrictions.		•		•		
OM-1	The Companies will comply with the road maintenance standards of the federal or state agency controlling the land.		•	•	•	•	•
OM-2	Roads will be maintained to have crossroad drainage in order to minimize the amount of channeling or ditches needed. Water bars will be installed at all alignment changes (curves), significant grade changes, and as requested by the federal or state agency.			•	•	•	•
OM-3	All access road drainage structures, constructed and installed for the Companies’ use only, will be maintained or repaired by the Companies during O&M activities or emergency response.			•	•	•	•
OM-4	Although routine and corrective O&M is of limited duration and impact, the Companies will attempt to adhere to specific closure periods and areas and are proposing not to conduct any routine and corrective O&M activities during the timeframes and at the locations identified in Appendix R of the Plan of Development to the greatest extent practical. The appropriate federal or state agency will notify the Companies of any spatial or temporal restrictions that are in effect for the Project area (e.g., fire restrictions) that would be applicable to corrective O&M activities.		•	•	•	•	
OM-5	Existing improvements (fences, gates, etc.) will be repaired or replaced if they are damaged by O&M activities, as agreed to by the parties involved.			•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
OM-6	The Agencies may restrict general public access to closed federal or state roads and access roads that the Companies maintain (the Companies will maintain access roads constructed for the Companies' use only). In cases of restricted access, the Companies will physically close the road with a gate. Gates will be locked with both a lock supplied by the Companies and with a federal agency lock. Access management will be updated as necessary to reflect current road closures and gate locations.		•	•	•	•	
OM-7	Any integrated vegetation management (IVM) control method, including those listed in Appendix R of the Plan of Development, may be used to control the growth of trees and tall shrubs to maintain clearances (the IVM recommended wire and border zones as indicated in Appendix R of the Plan of Development) and improve access to facilities.			•	•	•	•
OM-8	Any IVM control method including those listed in Appendix R of the Plan of Development may be used to control the growth of additional vegetation to maintain clearances, the IVM recommended wire and border zones as indicated in Appendix R, and improve access to facilities.			•	•	•	•
OM-9	Where possible, low-growing vegetation and small tree species within the right-of-way (ROW) that will not grow into the minimum required clearance distance will be left in place; trees may be removed on a subsequent maintenance cycle as they increase in size. Hazard trees are typically those trees or snags within or adjacent to the ROW that are likely to interfere with or fall into transmission lines or associated facilities. Hazard trees and other "hot spots" (high priority areas requiring vegetation management actions) are identified during routine line inspections and removed annually. In addition to hazard trees, other critical conditions that may require immediate attention include trees that interfere with transmission conductors and trees whose growth will not allow safe clearance until the next scheduled maintenance cycle.			•	•	•	•
OM-10	Any vegetation control method may be used for vegetation maintenance on access roads; this is typically scheduled at the same time as vegetation maintenance within the ROW. However, in cases where vegetation grows quickly, removal may occur annually. Vegetation that will not interfere with the safe operation of vehicles and equipment will be left in place.			•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
OM-11	Slash will be lopped and scattered throughout the surrounding land. Stumps resulting from vegetation treatments will not be over 1 foot tall (unless the tree is not able to be safely cut at or below one foot from the ground surface), and lopped slash will be left as close to the ground as possible. Lopped slash will be a maximum of 18 inches in length for small trees and limb wood. If the federal land managing agency determines that fuel levels are unacceptable, they shall notify the Companies and develop a mutually agreed upon method to reduce fuels. This may include, but is not limited to, chipping.			•	•	•	•
OM-12	Hazard trees will be felled in a direction away from the ROW. Slash and limbs that fall within the ROW will be treated as described above; boles of trees greater than 8 inches will be left in place.			•	•	•	•
OM-13	Any chemical control will be done in accordance with any applicable local, state, and federal rules and regulations. Pesticides or other chemical control will be selected from the BLM and USFS lists of previously approved pesticides and in accordance with any pesticide plans. If the federal land managing agency determines that a previously approved pesticide and/or plan is unacceptable, they shall notify the Companies.			•	•	•	•
OM-14	Before beginning an O&M project on federal or state land, the Companies or their subcontractors will clean all equipment that will operate off-road or disturb the ground. Tracks, skid plates, and other parts that can trap soil and debris will be removed for cleaning when feasible, and the entire vehicle and equipment will be cleaned at an off-site location.			•	•	•	•
OM-15	To help limit the spread and establishment of noxious weed species in disturbed areas, desired vegetation needs to be established promptly after disturbance. The Companies will rehabilitate significantly disturbed areas as soon as possible after ground-disturbing activities and during the optimal period. Seed and mulch will be certified “noxious weed free” and seed mix will be agreed to in advance by the landowner or land managing agency.			•	•	•	•
OM-16	Routine and corrective O&M activities in streams with sensitive fish species will occur from July 1 to September 1 in an effort to minimize impact to spawning and migration activities. These activities include, but are not limited to, culvert installation and/or replacement and stream bank stabilization. Fording streams at existing crossings on existing roads (e.g., dip, culvert, bridge) will occur as necessary throughout the year.			•	•	•	•
OM-17	Woody vegetation management within 50 feet of streams will be conducted by hand crews.			•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
OM-18	Herbaceous plants and low-growing shrubs will be left in place if they do not interfere with the safe O&M of Project lines and equipment as described in Appendix R of the Plan of Development.			•	•	•	•
OM-19	The Companies will use existing stream crossings or new, permanent crossings that were approved as part of the Project, and will not create additional crossings without prior agency permitting and approval.			•	•	•	•
OM-20	Only pesticides approved by the land managing agency as safe to use in aquatic environments and reviewed by the Companies for effectiveness will be used within 100 feet of sensitive aquatic resources or in areas with a high leaching potential.			•	•		
OM-21	Prior to the start of O&M activities, all supervisory personnel will be instructed on the protection of natural resources, including sensitive plant and wildlife species and habitats. If a contractor is used, the construction contract will address (a) the sensitive plant species that may be present in a particular area based on previous surveys and literature review; (b) the federal and state laws regarding protection of plants and wildlife; (c) the importance of these resources; (d) the purpose and necessity of protecting them; and (e) methods for protecting sensitive resources (e.g., Endangered Species Act, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and BLM wildlife policy).			•	•	•	•
OM-22	Sensitive plant populations that occur within or near the ROW and work areas will be marked on the ground, where practical, to ensure that they are avoided. If species are discovered during the work, the Companies will establish a spatial buffer zone, will contact the appropriate Agency within 24 hours, and will continue with the O&M activities outside of the established buffer unless otherwise directed. The Agency may evaluate the adequacy of the buffer on a case-by-case basis. Unless the Companies are informed otherwise, work outside of the buffer area will continue. If the Companies need to work within the buffer area, the Agencies and Companies will work together to develop a solution that is acceptable to both parties and will allow for the Companies to complete the work in a timely manner or within the scheduled outage window, if applicable. After the O&M activities are completed, or will no longer poses a threat to the plant population, the marking (stakes), if used, will be promptly removed to protect the site's significance and location from unwanted attention. As needed, marking will be reinstated during the land rehabilitation period.			•	•		

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
OM-23	If sensitive wildlife species are discovered during O&M activities, and the animals are not directly within ground disturbance areas, they will be protected by marking the edges of the ROW and new access roads in the general vicinity to ensure that workers do not leave those areas. If the animals are within work areas that have, or will have, ground disturbance, the Companies will establish an appropriate buffer zone and will contact the federal or state land manager immediately. The federal or state agency may evaluate the adequacy of the buffer on a case-by-case basis. Unless the Companies are informed otherwise, work outside of the buffer area will continue. If the Companies need to work within the buffer area, the Agencies and Companies will work together to develop a solution that is acceptable to both parties and will allow for the Companies to complete the work in a timely manner or within the scheduled outage window, if applicable. After the O&M activities are completed, or will no longer pose a threat to the species, the marking (stakes) will promptly be removed to protect the site's significance and location from unwanted attention. As needed, marking will be reinstated during the land rehabilitation period.			•	•	•	•
OM-24	The Companies will provide crews and contractors with maps showing environmentally sensitive areas; these maps will include work zones as well as ROW areas where ground disturbance will be avoided.			•	•	•	•
OM-25	In the event any sensitive plants require relocation, permission will be obtained from the federal agency. If avoidance or relocation is not practical, the topsoil surrounding the plants will be salvaged, stored separately from subsoil, and respread during the restoration process.			•	•		
OM-26	If sensitive wildlife species are killed or injured due to O&M activities, the appropriate federal agency will be notified.			•	•		
OM-27	All on-site personnel will be made aware that all birds of prey are protected by federal and state laws.			•	•	•	•
VISUAL							
VIS-1	The 500-kV transmission line lattice steel towers will be specified to have a dull galvanized finish. The proposed surface finish is a galvanized finish, treated after the initial galvanizing process to produce a dulled finish to reduce surface reflectivity. This process results in an installed tower with more visual absorption and thus allows the towers to blend in better with the landscape.	•			•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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VIS-2	The three subconductors (500-kV) and two subconductors (230-kV) that make up the conductor bundles will be specified to have a non–specular finish. Similar to the dulled finish of the transmission structures, the conductors reduce surface reflectivity. This process results in eliminating the shiny ribbon effect often seen in older untreated transmission lines and thus allows the conductors to blend in better with the landscape.	•			•	•	•
VIS-3	The proposed 230-kV transmission lines between Windstar and Aeolus will use a steel H-frame structure configuration similar to the existing 230-kV line in the same general location. The steel pole H-frame will utilize self-weathering steel. Self-weathering steel is manufactured from a group of steel alloys that were developed to eliminate the need for painting. This type of steel alloy forms a stable rust-like appearance if exposed to the weather for several years. In areas where the 230-kV structures are skylined, dull galvanized steel will be considered to minimize visual impacts. Dulled galvanized steel has a galvanized finish, treated after the initial galvanizing process to produce a dulled finish to reduce surface reflectivity. This process results in an installed tower with more visual absorption and thus allows the towers to blend in better with the terrain, while at the same time preserving the corrosion resistant properties of the galvanized coating on the steel.	•			•	•	•
VIS-4	No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate limits of survey or construction activity except as required under the timber sale contracts.		•		•	•	•
VIS-5	To minimize ground disturbance and/or reduce scarring (visual contrast) of the landscape, the alignment of any new access roads or cross-country routes will follow the landform contours where practicable, providing that such alignment does not impact resource values additionally or result in new impacts to resources that were previously avoided.	•	•		•	•	•
VIS-6	To minimize sensitive feature disturbance and/or visual contrast in designated areas on federal lands, structures will be placed so as to avoid sensitive features such as, but not limited to, riparian areas, water courses and cultural sites and/or to allow conductors to clearly span the features, within the limits of standard tower design. Where conflicts arise between resources, the applicable land manager will be consulted.	•	•		•		
VIS-7	To reduce visual impacts on federal land, including potential impacts on recreation values and safety, towers will be placed at the maximum feasible distance from the highway, canyon and trail crossings within limits of standard design and to the extent practical.	•	•		•		

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1	2	3-5			6-8		
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VIS-8	Crossings of rivers shall be at approximately right angles where practical. Strategic placement of structures will be done both as a means to screen views of the transmission line and ROW and to minimize the need for vegetative clearing.	•	•		•	•	•
VIS-9	Insulators will be made of materials that have reduced potential to reflect and refract light. Glass insulators that are highly reflective will not be permitted in scenic areas on federally managed lands.	•	•		•		
VIS-10	For segments of the line 1) within the 0- to 0.5-mile zone of Interstate highways where existing lines of the same voltage are paralleled and 2) within the 0- to 0.5-mile zone of residences where existing lines of the same voltage are paralleled, new towers will be located adjacent to existing towers, within the limits of standard transmission line design and considering the ruling span length of adjacent proposed and existing lines.	•	•		•	•	•
VIS-11	Site-specific "micrositing," within the limits of standard engineering design, will be required near certain sensitive areas, as identified by the agencies, where proposed transmission facilities will impact visual quality; these situations include: • Crossings over major highways; • Crossings of high quality historic trails; • Crossings over the North Platte and Snake Rivers; • Sensitive travelways, use areas, residential areas, recreational facilities as identified by the agencies (including national recreation and scenic trails, campgrounds, recreation areas, and trailheads), and other areas identified by management plans; and • To avoid bisecting forest patches within the Sawtooth NF. The Companies will consult with the applicable local land management agency during transmission line design.	•	•		•		
VIS-12	The lighting specified for the marshaling yards will be the minimum required to meet safety and security standards. All light fixtures within 1,000 feet of a residence will be hooded to eliminate any potential for glare and to prevent light from spilling off the site or up into the sky. Additionally, the fixtures will have sensors and switches to permit the lighting to be turned off at times when it is not required.		•		•	•	•
VIS-13	To reduce visual contrast in areas where overstory vegetation is removed for access, tower pads, or conductor clearance, specific sections of the ROW on federal land will have uneven edges (trees will be removed from the edge of the ROW out or away from the ROW	•	•		•		

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	boundary) to give a natural appearance, where not in conflict with regulatory requirements (e.g., NERC, WECC, and Occupational Safety and Health Administration requirements). This will be a onetime application (not applicable to operations and maintenance) and conducted with agency approval.						
VIS-14	To mitigate potential visual impacts on federal land, the construction and maintenance plan, to be developed by the Companies, will include measures to reduce ROW scarring and enhance restoration. The plan will be approved by the land management agency prior to ground clearing and construction.	•		•	•		
VIS-15	If Alternative 7K is selected, Natina stain (or an equivalent product) will be applied to towers (including lattice towers) placed on NFS lands within the Sawtooth NF to reduce visual effects at the middleground level. Note that this is an agency imposed measure.	•	•	•	Sawtooth NF (Not Applicable to Segment D)		
CULTURAL							
CR-1	All work conducted in accordance with the Historic Properties Treatment Plan (HPTP) will be performed by qualified archeologists with trained assistants.		•		•	•	•
CR-2	An Inadvertent Discovery Plan will be included as part of the HPTP. This plan will specify what steps will be taken if a subsurface cultural resource is discovered during construction, including stopping construction in the vicinity of the find, notification of the appropriate land management agency, identification of a qualified archaeologist to conduct an evaluation of the find, and the development of an approved data recovery program or other mitigation measures.		•		•	•	•
CR-3	The Cultural Resources Protection Plan will include provisions for the preparation and curation of artifacts from federal lands and for the preparation of a final report based on the data recovered for activities on federal lands.		•		•		
CR-4	Literature reviews and Class III surveys will be completed for cultural resources. A literature review will be conducted on public and private lands and will cover a study area of one-half mile on either side of the proposed and alternate transmission line alignments as well as areas identified for use as multi-purpose areas and access roads. Class III surveys covering the Area of Potential Effect (APE) as specified in the Programmatic Agreement will be completed. A Class II Sample Survey was conducted that consisted of an intensive	•			•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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	pedestrian survey of 15 percent of the length of all alternatives. One-mile long by 500-foot wide transect strips were surveyed along proposed and alternative routes on federal lands only, for use in detailed analysis in the EIS. This also included a detailed preliminary assessment of effects on historic trails on all lands within the APE, including existing trail condition and a visual effects assessment.						
CR-5	If construction will adversely affect any properties listed on, or eligible for listing on, the National Register of Historic Places (NRHP), mitigation will be required. Mitigation will be in accordance with the HPTP and may include, but not be limited to, one or more of the following measures: a) avoidance through the use of relocation of structures through the design process, realignment of the route, relocation of temporary workspace, or changes in the construction and/or operational design; b) the use of landscaping or other techniques that will minimize or eliminate effects on the historic setting or ambience of standing structures; and c) data recovery, which may include the systematic professional excavation of an archaeological site or the preparation of photographic and/or measured drawings documenting standing structures.		•		•	•	•
CR-6	Avoidance areas will be flagged or otherwise marked prior to construction activities. Flagging or other marking will be removed once construction is completed in an area.		•		•	•	•
CR-7	To minimize unauthorized collecting of archaeological material or vandalism to known archaeological sites, all workers will attend mandatory training on the significance of cultural resources and the relevant federal regulations intended to protect these resources.		•		•	•	•
CR-8	If human remains are discovered, construction will be halted and the coroner will be notified and measures specified in the HPTP will be followed.		•		•	•	•
CR-9	On NFS lands, a management plan should be developed for each historic property nominated to the NRHP. The plan should be drafted during the nomination process. The National Heritage Strategy should be used to guide decisions on issues related to the Heritage Program.	•		•	NFS lands only		
RECLAMATION							
WEED 1 – 3, and 6 – 18	(Described under Weeds)						

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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WQA 32, 34, and 35	(Described under Water Quality)						
REC-1	The Companies' personnel and their contractor will be trained on noxious and invasive weed identification to facilitate avoidance of infestations where possible or identification of new infestations.			•	•	•	•
REC-2	Preconstruction weed treatment will be conducted prior to the start of ground-disturbing activities and at the time most appropriate for the target species.		•		•	•	•
REC-3	Preconstruction weed treatment will be limited to the areas that are expected to have surface-disturbing activities. The Final Reclamation Plan will include a schedule showing the phased in-service dates for different segments. Preconstruction weed treatment will be scheduled accordingly.		•		•	•	•
REC-4	Preconstruction treatment may use mechanical control, hand spraying, grazing, or pesticides. The Final Reclamation Plan will discuss those options, as applicable.		•		•	•	•
REC-5	All pesticide applications will comply with label restrictions, federal, state and/or county regulation, the Companies' specifications and landowner agreements. No spraying will occur prior to notification of the applicable land management agency. On federal or state controlled lands, a pesticide use plan will be submitted prior to any pesticide application as recommended in the BLM herbicide EIS (http://www.blm.gov/wo/st/en/prog/more/veg_eis.html). The pesticide use plan will include the dates and locations of application, target species, pesticide, adjuvants, and application rates and methods (e.g., spot spray vs. boom spray). No pesticide will be applied to any private property without written approval of the landowner. The Final Reclamation Plan will contain a list of pesticides that may be used, target species, best time for application, application rates, and if they are approved for use on BLM-managed and NFS lands.		•		•	•	•

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1	2	3-5			6-8		
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REC-6	Pesticides may be applied using a broadcast applicator mounted on a truck or all-terrain vehicle (ATV), backpack sprayers, or with hand sprayers as conditions dictate. Pesticide applications will be conducted only by licensed operators or under the supervision of a licensed operator. Vehicle-mounted sprayers (e.g., handgun, boom, and injector) may be used in open areas readily accessible by vehicle. Where allowed, a broadcast applicator will likely be used. In areas where noxious weeds are more isolated and interspersed with desirable vegetation, noxious and invasive weeds will be targeted by hand application methods (e.g., backpack spraying), thereby avoiding other plants. Preconstruction pesticide applications will not occur within 100 feet of known special status species. Calibration checks of equipment will be conducted at the beginning and periodically during spraying to ensure proper application rates are achieved.		•		•	•	•
REC-7	All areas treated will be documented using GPS technologies and included in the annual report.			•	•	•	•
REC-8	Areas of existing noxious weeds and invasive species will be avoided where possible to reduce the risk of spread.		•	•	•	•	•
REC-9	Project vehicles will arrive at the job site clean of all soil and herbaceous material. The Construction Contractor will ensure vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment access the Project. The CIC will inspect vehicles to ensure compliance.		•	•	•	•	•
REC-10	When the Construction Contractor demobilizes from the job site where identified infestations of noxious weeds are present, they will use appropriate decontamination measures as defined in the Final Reclamation Plan.		•	•	•	•	•
REC-11	Soil stockpiles from areas that did not have noxious weeds or invasive species present, will not be placed adjacent to populations of noxious weeds or invasive species, where practicable.		•		•	•	•
REC-12	Areas disturbed by Project activities are susceptible to the establishment and spread of noxious weeds. Erosion control measures identified in the SWPPP(s) will also assist in preventing the establishment of weeds on exposed soils.		•		•	•	•
REC-13	Project-related storage and multi-purpose areas, fly yards, and other areas that are subject to regular long-term disturbance will be kept weed-free through regular site inspections and pesticide applications, subject to the consent of the landowner.		•		•	•	•

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REC-14	Where preconstruction surveys have identified noxious or invasive weed species infestations, topsoil and other soils will be placed next to the infested area and clearly identified as coming from an infested area. Movement of stockpiled vegetation and salvaged topsoil will be limited to eliminate the transport of soil-borne noxious weed seeds, roots, or rhizomes, and marked as containing noxious seed materials to avoid mixing with weed-free soil. Topsoil will be returned to the area it was taken from and will not be spread in adjacent areas. If the topsoil is not suitable for backfill, then it will be spread in another previously disturbed area and clearly identified for future weed treatments as applicable. As directed by the BLM or USFS, the Construction Contractor may be required to provide additional treatments (i.e., pre-emergent pesticides) to prevent return of noxious weeds.		•		•	•	•
REC-15	Straw or hay that may be used as a BMP to control erosion and sedimentation must be certified weed free. If certified weed-free materials are not available, then alternative BMPs will be used. The use of alternative BMPs will be coordinated with the construction storm water inspector.		•		•	•	•
REC-16	The topsoil layer will be removed, taking care not to mix it with the underlying sub-soil. Where topsoil separation is employed, topsoil will be stored in a separate stockpile.		•		•	•	•
REC-17	Certified weed-free straw, mulch, gravel, and other BMPs as appropriate, will be used as described in the SWPPP to stabilize the stockpile and limit erosion and standing water, control dust, and control the establishment of noxious or invasive weeds in stockpiled soils.		•		•	•	•
REC-18	Topsoil and sub-surface soils will be replaced in the proper order during reclamation.		•		•	•	•
REC-19	Where it is necessary to spread soils (subsurface soils or waste rock resulting from excavations or foundation drilling), it will be done where practicable and in close proximity to where the disturbance occurred (within the ROW). Material will be spread uniformly to match existing contours, covered with topsoil when available, and reseeded.		•		•	•	•

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REC-20	Temporarily disturbed lands within the ROW will be recontoured to blend with the surrounding landscape. Recontouring will emphasize restoration of the existing drainage patterns and landform to preconstruction conditions, to the extent practicable. (Tower pads will not be recontoured.)		•		•	•	•
REC-21	De-compaction: Areas within the ROW, laydown or multi-purpose areas, and other areas of extensive vehicle travel will typically contain compacted soils. These soils will be de-compacted on a case-by-case basis through negotiation with the landowner or land management agency.		•		•	•	•
REC-22	Final Cleanup: Final cleanup will ensure that all construction areas are free of any construction debris including, but not limited to: assembly scrap metals, oil or other petroleum-based liquids, construction wood debris, and worker-generated litter. Permanent erosion control devices will be left in place.		•		•	•	•
REC-23	The Companies will utilize soil amendments (e.g., fertilizer, wood or straw mulches, tackifying agents, or soil stabilizing emulsions) on a case-by-case basis and with landowner or land management agency approval. Specific soil amendments will be identified in the Final Reclamation Plan and be consistent with the SWPPPs.		•		•	•	•
REC-24	Broadcast seeding will apply the seed directly on the ground surface. The type of broadcast spreader will depend on the size of the area to be seeded, and the terrain. Seed will be placed in direct contact with the soil, ideally at a depth of approximately 0.5 to 1-inch deep. It will then be covered by raking or dragging a chain or harrow over the seed bed to remove air pockets.		•		•	•	•
REC-25	Drill seeding will be used on areas of sufficient size with moderate or favorable terrain to accommodate mechanical equipment. Drill seeding provides the advantage of planting the seed at a uniform depth.		•		•	•	•
REC-26	Hydroseeding, which is the spraying of seeds and water onto the ground surface, or hydroseeding/hydromulching, which is the spraying of seeds, mulch and water, may be implemented on steeper slopes. Tackifier may be added to facilitate adherence of hydromulch to slopes greater than 25 percent.		•		•	•	•
REC-27	Reclamation treatments, such as seeding, will be based on site-specific conditions and the appropriate seed mix approved for those conditions. Seeding will help to reduce the spread of noxious weeds by revegetating exposed soils.		•		•	•	•

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REC-28	If areas are not immediately seeded after construction, due to weather or scheduling constraints, all noxious weeds will be eradicated before seeding, preferably in the spring.		•		•	•	•
REC-29	Upon completion of construction, 70 percent of the disturbed area along the transmission line within the ROW, at substations, and at related facilities will be revegetated with approved vegetation (refer to Appendix D – Framework Reclamation Plan).		•		•	•	•
VEGETATION							
REC-2–17, 23–29	(Described under Reclamation)						
WEED-6, 7, and 11	(Described under Weeds)						
VEG-1	During construction, blading of native plant communities will be minimized, consistent with safe construction practices. Where feasible, shrubs will be cut at or near ground level to facilitate re-growth after construction. The footprint of construction and operations facilities will be kept to the minimum necessary. Blading near watercourses will be minimized and BMPs identified in the SWPPPs will be implemented to reduce the risk of materials entering watercourses.		•		•	•	•
VEG-2	Where feasible, locate new access roads to minimize the number of trees removed during construction. However, new access roads will not be relocated if the change would result in an increase in the overall disturbance (acres); require additional cut and fill activities, or impact other sensitive resources (e.g., sagebrush plant community, sensitive species habitat, and/or cultural resources or viewshed).	•			•		
VEG-3	In areas where revegetation will be completed, topsoil salvage and replacement will be used for all cut or fill areas and for areas larger than 1 acre where soils will be disturbed during construction.		•		•	•	•

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VEG-4	Prior to the start of construction and maintenance activities, all contractor vehicles and equipment (including personal protective equipment) will be cleaned of soil and debris capable of transporting invasive plant seeds or other propagules. All vehicles and equipment will be inspected by Agency-approved inspectors and certified as weed free by agency approved personnel, in order to ensure they have been cleaned properly. The Construction Contractor will identify the location of all cleaning stations, how materials cleaned from vehicles at these stations will be either captured or treated so that cleaning station locations will not become infected, and who will confirm/certify that vehicles leaving cleaning stations and/or entering construction sites are free of invasive plant materials in the Final Reclamation and Noxious Weed Plans.		•	•	•	•	•
VEG-5	The Agency-approved Environmental CIC will approve primary noxious weed-free straw or other erosion control materials on federally managed lands prior to application.		•		•		
VEG-6	The Companies will consult with the appropriate land management agency to determine tree seedlings to be planted in decommissioned roadbeds and other temporarily disturbed areas on federally managed lands (where trees were removed) to assure seedlings are matched to site conditions.			•	•		
VEG-7	The Companies will notify the USFS when topsoil salvage operations are scheduled and seek assistance with field identification of topsoil material.	•	•		NFS land only		
VEG-8	Annual post-construction monitoring and treatment of invasive plants on closed roads (access roads dedicated for use by the Companies only), temporary roads, fly yards, and other disturbed areas in the ROW shall continue for 3 years in areas where infestations or populations of noxious weeds have been identified. If after 3 years, post-construction conditions are not equivalent to or better than preconstruction conditions (in accordance with applicable permit), monitoring and treatment will continue until these conditions are met. If adjacent land uses are contributing to the introduction and/or persistence of invasive plant species within areas disturbed by the Project, then the Companies will not be required to treat noxious weeds for more than 3 years.			•	•		
VEG-9	The Companies will meet the terms and stipulations within the timber sale contracts for timber removal operations on the Medicine Bow-Routt, Caribou-Targhee, and Sawtooth NFs.		•		NFS land only		
VEG-10	All timber and other vegetative resources to be sold or removed from federal lands will be appraised and sold at the appraised value.		•		Federal land only		

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	Note that this is an agency imposed measure.						
TES-PLANTS							
OM-21–22 and 24–25	(Described under Operations and Maintenance.)						
TESPL-1	Blowout Penstemon – Surface disturbance will be allowed in suitable habitat where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted the year prior to construction, and the proposed disturbance areas will be redesigned to avoid direct impact to populations.		•		•		
TESPL-2	Colorado Butterfly Plant – Surface disturbance will be allowed in suitable habitat where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted the year prior to construction, and the proposed disturbance areas will be redesigned to avoid direct impact to populations.		•		•		
TESPL-3	Qualified botanists shall conduct preconstruction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositing of Project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to the applicable land management agencies for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction.	•			•		

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
TESPL-4	Slickspot Peppergrass – Environmental monitors will survey for and mark slickspots and aboveground populations of slickspot peppergrass within 50 feet of the construction area prior to ground disturbance (including roads) in potential or occupied slickspot peppergrass habitat. No construction shall occur within 50 feet of any slickspot peppergrass plants or slickspots found by the environmental monitor. Also, construction shall not occur within 50 feet of previously known occupied slickspot peppergrass areas, based on Idaho CDC data, even if aboveground plants are not observed by the environmental monitor. Within proposed critical habitat, impacts to Primary Constituent Elements, such as native sagebrush/forb vegetation, will be avoided to the extent practicable. Seeding during reclamation in areas of suitable habitat will use methods that minimize soil disturbance such as no-till drills or rangeland drills with depth bands. Reclamation will use certified weed-free native seed. Excess soils will not be stored or spread on slickspots. Note that this species is not expected to occur in Segment D.	•	•		•	•	•
TESPL-5	Sand dune and cushion plant communities will be avoided, where feasible.	•	•		•		
TESPL-6	Goose Creek Milkvetch – Surface disturbance will be allowed in suitable habitat for Goose Creek milkvetch where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted the year prior to construction, and the proposed disturbance areas will be redesigned to avoid direct impacts to populations. Note that this species is not expected to occur in Segment D.	•			•	•	
TESPL-7	Ute Ladies'-tresses – Qualified botanists shall conduct preconstruction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositing of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to the applicable land management agencies for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction.	•			•	•	•
WEEDS							
REC-2–15, 17	(Described under Reclamation)						

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
OM-13–15 and 20	(Described under Operations and Maintenance)						
VEG-4 and 8	(Described under Vegetation)						
FISH-3	(Described under Fish)						
SOIL-11 and 12	(Described under Soils)						
WEED-1	The Companies shall consult with each appropriate local land management agency (USFS and BLM) office to determine appropriate seed mix and commercial seed source for revegetation. The Final Reclamation Plan shall specify the approved seed mixes for federal lands. Disturbed soil will not be allowed to support the growth of noxious weeds or invasive weedy species. Prevention of noxious weeds will apply to all phases of the Project.	•	•		•	•	
WEED-2	Weed control and prevention measures shall adhere to all agency standards and guidelines. These measures shall be developed in consultation with local, state, and federal weed agencies; all implemented measures will follow the principle of integrated weed management.		•		•	•	•
WEED-3	Soil stockpiles in areas containing noxious weeds and invasive plant species shall be kept separate from soil removed from areas that are free of noxious weed and invasive plant species, and the soil will be replaced in or near the original excavation. If requested by the applicable land management agency, soil stockpiles shall be covered with plastic if the soil stockpile will be in place for two weeks or more and is not being actively used. On lands managed by the USFS or per private landowner request, stockpiles will not be covered with plastic.		•		•		
WEED-4	Gravel and other materials used for road construction on federally managed lands shall come from certified weed-free sources.		•		Federal land only		
WEED-5	Where feasible, construction will begin in weed-free areas before operating in weed-infested areas. The feasibility of this measure will be determined after survey data is completed to identify weed-free and weed-infested areas.		•		•	•	•
WEED-6	All movement of construction vehicles outside of the ROW will be restricted to pre-designated access, contractor-acquired access, or public roads. All construction sites and access roads, including overland access routes, will be clearly marked or flagged at the		•		•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	outer limits prior to the onset of any surface-disturbing activity. All personnel shall be informed their activities must be confined within the marked or flagged areas.						
WEED-7	Prior to arrival at the work site, all Construction Contractor vehicles and equipment will be cleaned using high-pressure air or water equipment. The cleaning activities will concentrate on tracks, feet, or tires and the undercarriage with special emphasis on axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Vehicle cabs will be swept out. The locations of vehicle cleaning stations will be identified by the Construction Contractor. Additional wash stations will be required as identified by the BLM, USFS, and CIC. Wash stations shall be no more than one acre in size and preferably located in areas that have previously been disturbed. The Construction Contractor shall provide a detailed design identifying all of the components of the wash stations, including rock surface and geomembrane layer to provide a barrier between noxious weeds and seeds and the soil for approval by the BLM or USFS Authorized Officer or his/her designated representative. The Construction Contractor shall also provide a description of how residue from the wash station will be disposed of for approval by the BLM, BOR, or USFS Authorized Officer or his/her designated representative.		•		•	•	•
WEED-8	When moving from weed contaminated areas to other areas along the transmission line ROW, all construction vehicles and equipment will be cleaned using compressed water or air in designated wash stations before proceeding to new locations. All washing of construction vehicles and equipment must be performed in approved wash stations.		•		•	•	•
WEED-9	Construction personnel will inspect, remove, and appropriately dispose of weed seed and plant parts found on their clothing and equipment.		•		•	•	•
WEED-10	Immediately following construction, the Construction Contractor will implement the reclamation of disturbed land as outlined in Appendix D – Framework Reclamation Plan as required. Continuing revegetation efforts will ensure adequate vegetative cover, reducing the potential for the invasion of noxious weeds.		•		•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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WEED-11	Discing or other mechanical treatments that would disturb the soil surface within native habitats will be avoided in favor of pesticide application, which is an effective means of reducing the size of noxious weed populations, as well as preventing the establishment of new colonies.		•		•	•	•
WEED-12	Implement preventive measures, such as quarantine and closure, to reduce and contain existing noxious weed populations. Flagging will alert personnel and prevent access into areas where noxious weeds occur. Construction disturbance will be minimized in these areas until control measures have been implemented (with the exception of reclamation treatments, as applicable).		•		•	•	•
WEED-13	If discing or tilling is an appropriate and feasible weed treatment method, it will only be permitted in bladed areas.		•		•	•	•
WEED-14	Seed selection will be based on site-specific conditions, and the appropriate seed mix will be identified for those conditions based on the presence and treatment of noxious weeds in the Project area. The CIC or weed specialist may recommend modified seeding application rates and timing of implementation to achieve site-specific weed management objectives.		•		•	•	•
WEED-15	Additional weed and/or erosion control measures recommended during monitoring will follow the preventive and control measures outlined in the Noxious Weed Plan. Continued cooperation with the current BLM, BOR, or USFS noxious weed coordinator and local weed management areas is also encouraged.		•		•	•	•
WEED-16	A certified pesticide applicator, approved in the states of Wyoming or Idaho, will perform the application using pesticides selected and approved by BLM or USFS in accordance with applicable laws, regulations, and permit stipulations. All pesticide applications must follow U.S. Environmental Protection Agency label instructions. Application of pesticides will be suspended in accordance with the Companies' vegetation management specifications (e.g., strong winds, etc.).		•		•	•	•
WEED-17	Pesticides will be transported to the Project site daily with the following provisions: • Only the quantity needed for that day's work will be transported. • Concentrate will be transported only in approved containers in a manner that will prevent tipping or spilling, and in a location isolated from the vehicle's driving compartment, food, clothing, and safety equipment.		•		•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	• Mixing will be done offsite, over a drip catching device and at the following distances from open or flowing water, wetlands, or other sensitive resources: 100 feet for practically non-toxic to slightly toxic pesticides; 250 feet for moderately toxic or label advisory for ground/surface water; and 250 feet for highly toxic to very highly toxic pesticides. No pesticides will be applied at these areas unless authorized by appropriate regulatory agencies. • All pesticide equipment and containers will be inspected for leaks daily. • Disposal of spent containers will be in accordance with the pesticide label.						
WEED-18	Pesticide contractors will be state-certified to apply pesticides and will obtain, and have readily available, copies of the appropriate material safety data sheets for the pesticides used. All pesticide spills will be reported in accordance with applicable laws and requirements.		•		•	•	•
STREAMS and WETLANDS							
OM- 16-20	(Described under Operations and Maintenance)						
VIS-6 and 8	(Described under Visual)						
REC-1–22, and 29	(Described under Reclamation)						
FISH-1 and 3	(Described under Fish)						
WQA-1, 2, 4 – 6, 13 – 18, 21, 23 – 29, and 45 – 48	(Described under Water Quality)						
TRANS-13, and 16 – 18	(Described under Transportation)						

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
WET-1	Impacts on wetland and riparian areas will be avoided unless physically or economically infeasible or where activities are permitted. Land management agencies' plans (RMPs, MFPs, and Forest Plans) that have standards, guidelines, stipulations, or avoidance buffers will be adhered to. Where these do not exist, Inland Fish Strategy (INFISH) buffers will be followed.	•			•		
WET-2	Wetland delineations will be performed prior to construction to support CWA Section 404 permitting and to minimize Project impacts. The delineation will identify both wetland and non-wetland waters of the United States that would be affected by the Project.	•			•	•	•
WET-3	Where impacts on wetlands are not avoidable, site-specific crossing plans and measures to mitigate impacts will be submitted to the appropriate regulatory agency, as well as the land-managing agency. The Companies and/or Construction Contractor will obtain all necessary permits prior to discharging dredged or fill material to waters of the U.S. and state.	•			•	•	•
WET-4	To meet USACE requirements for CWA 404 permitting, the Companies will submit a mitigation plan that is accepted by the USACE. The framework for this plan is included in the Final EIS.	•			•	•	•
WET-5	Limit construction equipment operating in streams and wetlands to that needed to clear temporary access, erect towers, pull conductor, and perform ground disturbing activities.		•		•	•	•
WET-6	Limit clearing of vegetation at the edges of a stream or wetland to the minimal area necessary for required conductor clearance and vehicle passage. Reclaim at least 70 percent of potential ground cover within 100 feet from the edges of all perennial streams, lakes, and other water bodies, or to the outer margin of the riparian ecosystem where wider than 100 feet.		•	•	•	•	•
WET-7	Salvage and respread topsoil in areas subject to temporary disturbance where grading and excavation will occur.		•		•	•	•
WET-8	Prohibit the use of imported soil, tree stumps, riprap, or brush to stabilize the construction corridor within wetlands.		•	•	•	•	•
FISH							
OM-16	(Described under Operation and Maintenance)						
BLA-2	(Described under Public Safety)						

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
FISH-1	On BLM-administered land, all culverts, whether temporary or permanent, must be designed to meet BLM Gold Book standards (Surface Operating Standards and Guidelines for Oil and Gas Exploration Development). On NFS lands, Forest Plan standards and guidelines shall apply.	•	•		•		
FISH-2	When taking water from TES fish-bearing streams for road and facility construction and maintenance activities, intake hoses shall be screened with the most appropriate mesh size (generally 3/32 of an inch), or as determined through coordination with NMFS and/or USFWS.		•	•	•	•	•
FISH-3	All wetlands and waters in the project area are assumed to contain aquatic invasive species and all equipment contacting water will be properly disinfected. After work is complete in a waterbody, any equipment involved in construction in that waterbody must be washed to remove any propagules of aquatic invasive species and to prevent the spread of those species to other waterbodies.		•		•	•	•
WILDLIFE							
WILD-1	Requests for exceptions from closure periods and areas will be submitted by the Companies or the Construction Contractor per the Companies' direction to the appropriate BLM Field Office in which the exception is requested through the Environmental CIC. Established exception processes on BLM-managed lands will be followed. The agency, the CIC, or a contractor chosen by the Companies and approved by the agency, will conduct any surveys and coordinate with any other agencies as necessary. Factors considered in granting the exception include; animal conditions, climate and weather conditions, habitat conditions and availability, spatial considerations (e.g., travel routes and landscape connectivity), breeding activity levels, incubation or nestling stage, and timing, intensity, and duration of the Proposed action. Requests will be submitted in writing no more than 2 weeks prior to the proposed commencement of the construction period, to ensure that conditions during construction are consistent with those evaluated. The Authorized Officer, on a case-by-case basis, may grant exceptions to seasonal stipulations, and has the authority to cancel this exception at any time. A good faith effort will be made to act on exceptions within 5 business days of receiving a request, to allow for orderly construction mobilization. The CIC will conduct any required site visit and report the status to BLM for consideration of the decision to accept or deny the request. There is no exception process		•	•	•		

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	for NFS lands; all closure periods will be adhered to. Any proposed modifications to closure periods will be discussed on a case-by-case basis with the USFS.						
WILD-2	Vehicular speeds during construction and operations will be limited to 25 mph on all unsurfaced access roads. Crew and vehicle travel will be restricted to designated routes while on state designated big game winter range (except for areas within the ROW).		•	•	•		
WILD-3	The Project will be designed and constructed in compliance with Avian Power Line Interaction Committee (APLIC) guidance in order to reduce impacts to avian species. Any changes to the Project's design, as requested by federal, state, or local jurisdictions, as well as any changes considered by the Companies, will also be in compliance with APLIC guidance.	•	•	•	•	•	•
WILD-4	Preconstruction pedestrian or aerial nest surveys will be conducted in suitable habitat during the appropriate nesting time periods needed to identify new raptor nest locations, and to establish the status of previously identified raptor nests. Appropriate buffers will be applied to active nests during construction. All encounters of nesting raptors in the survey area will be reported to the biological monitor and to appropriate agencies.		•		•		
WILD-5	Surveys will be conducted along the route across the Caribou-Targhee NF, prior to construction, for caves, abandoned mines, and adits. If suitable bat roosts are identified, the Companies will consult with the USFS to determine appropriate protective measures.	•	•		Caribou-Targhee NF only		
WILD-6	Guy wires will be marked with bird deterrent devices on federal lands to avoid avian collisions with structures, as directed by local land manager.	•		•	•		
WILD-7	Flight diverters will be installed and maintained where the transmission line crosses rivers at the locations identified in Appendix H, Table 4-1.. Additional locations may be identified by the Agencies or the Companies. The flight diverters will be installed as directed in the Companies' approved Avian Protection Plans and in conformance with the MBTA and Eagle Acts as recommended in the current APLIC collision manual.	•		•	•	•	•
WILD-8	Preconstruction pedestrian or aerial surveys will be completed during appropriate nesting time periods, needed to identify each raptor species. The Companies will provide survey results to the Authorized Officer for approval. (See WILD-1)		•		•		
WILD-9	To the extent feasible, all vegetation clearing will be conducted prior to the onset of the avian breeding season (generally April 15 through July 31, depending on local conditions and federal land management plan requirements) in order to minimize impacts to migratory		•		•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	birds. Where this is not feasible, preconstruction surveys within the disturbance footprint shall be conducted within seven days prior to clearing. If an active nest (containing eggs or young) of a bird species protected under the MBTA is found during either preconstruction surveys or construction activities, the nest will be identified to species, inconspicuously marked, and vegetation left in place until any young have fledged.						
WILD-10	Snags will be maintained along the outer portions of the Project's ROW in order to reduce the impacts to cavity nesting habitat to the extent practical and where not in conflict with the Companies' vegetation management specifications.		•		•		
WILD-11	Any areas that may require blasting will be identified and a blasting plan will be submitted to the appropriate agency for approval. Blasting within 0.25 mile of a known sensitive wildlife resource will require review and approval by the appropriate agency.		•		•		
WILD-12	The Companies will annually document the presence and location of large stick nests on any towers constructed as a result of this Project. Nests will be categorized to species or species group (raptors or ravens), to the extent possible. This will begin following the first year of construction and continue through year 10 of operations. Results will be provided annually to the applicable land management agency and to the USFWS. Note that this is an agency imposed measure.			•	Federal land only		
TES-WILDLIFE							
TESWL-1	H-frame structures will be equipped with anti-perch devices to reduce raven and raptor use, and limit predation opportunities on special status prey species on federally managed lands. Note that this is an agency imposed measure based on the Casper and Rawlins RMPs.	•	•	•	•		
TESWL-2	In the event that an ESA-listed species not covered by the Biological Opinion (BO) is discovered during surveys, construction will cease, the USFWS will be notified, and Section 7 consultation will be initiated. In addition, the transmission line or structures will be relocated to minimize direct impacts to newly discovered ESA species, to the extent practical.		•	•	•	•	•
TESWL-3	Black-footed Ferret – Preconstruction surveys will be conducted for the black-tailed prairie dog (in addition to those already proposed for the white-tailed prairie dog) in Segment 1W.[1/]	•	•	•	•	•	•

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TESWL-4	The Environmental CIC, an agency biologist, or agency designee will accompany the Construction Contractor site engineers during the final engineering design or prior to ground-disturbing activities to verify and flag the location of any known occupied structures (e.g., nests, burrows, colonies, dens) utilized by sensitive species. This will include, but not be limited to, artificial burrows that have been constructed as part of research/restoration efforts, prairie dog colonies, and raptor nests, which could be impacted by the Project based on the indicative engineering design. The final engineering design will be "microsited" (routed) to avoid direct impact to these occupied structures to the extent practical within engineering standards and constraints.	•			•		
TESWL-5	Grouse Species – The Companies will provide the Agencies a list of the protocols that the Companies will use during greater sage-grouse and sharp-tailed grouse preconstruction surveys. The Agencies will either approve these protocols, or suggest alternative protocols to be used.	•	•	•	•		
TESWL-6	Sharp-tailed Grouse – In areas where sharp-tailed grouse leks occur in proximity to greater sage-grouse leks, surface disturbance will be avoided within 4 miles of occupied or undetermined greater sage-grouse leks from March 1 to July 15. In areas where sharp-tailed grouse leks occur in isolation from greater sage-grouse leks, surface disturbance will be avoided within 1.2 miles of occupied or undetermined sharp-tailed grouse leks from March 15 to July 15.	•	•	•	•		
TESWL-7	Yellow-billed cuckoo - A preconstruction survey for the yellow-billed cuckoo will be conducted at any proposed crossing of suitable habitat. If these birds are detected within 1 mile of the centerline (within existing habitat), construction will not occur until the young have fledged or the nest is abandoned. The crossing-specific plan will contain proposed monitoring measures to assure compliance with this measure.	•	•	•	•		
TESWL-8	Sage-Grouse – On federal lands, there will be no surface occupancy (NSO) within 0.6 mile of the perimeter (or centroid if the perimeter has not been mapped) of occupied greater sage-grouse leks located within Core areas in Wyoming, and NSO within 0.25 mile in non-Core areas (as required by BLM IM WY-2012-19 and BLM land management plans). "No surface occupancy," as used here, means no new surface facilities, including roads, will be placed within the NSO area. Other activities (i.e., non-surface occupancy) may be		•	•	•		

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	authorized, with the application of appropriate seasonal stipulations, provided the resource's protected area is not adversely affected.						
TESWL-9	Sage-Grouse – On federal lands, surface disturbance will be avoided within 4 miles of occupied or undetermined greater sage-grouse leks from March 1 to July 15. This distance (i.e., 4 miles) may be reduced on a case-by-case basis by the applicable agency, if site-specific conditions will allow the Project to be located closer to the lek than 4 miles (e.g., topography prevents the Project from being visible from the lek, or a major disturbance such as a freeway or existing transmission line is located between the Project and the lek).		•	•	•		
TESWL-10	Sage-Grouse – If Winter Concentration Areas for the greater sage-grouse are designated, there will be no surface disturbances within the designated areas from November 1 through March 15.		•	•	•		
TESWL-11	Sage-Grouse – No structures that require guy wires will be used in occupied sagebrush obligate habitats within the area managed under the Kemmerer RMP.		•	•	•		
TESWL-12	Colorado River T&E Fishes – A payment of a one-time fee, based on a fee schedule provided by the USFWS, will be made based on the amount of water used during construction of any segments that cross the Colorado River system.		•		•	•	•
TESWL-13	Midget faded rattlesnake – Preconstruction surveys for occupied or potential midget faded rattlesnake hibernacula (i.e., rock outcrops with south to east aspect) will be conducted. The Companies shall prepare a plan identifying measures to reduce impacts to midget faded rattlesnake if they are discovered. This plan shall require approval by BLM and the WGFD prior to its implementation	•	•	•	•		
TESWL-14	For the protection of aquatic and riparian/wetland dependent species, surface disturbing and disruptive activities will be avoided in the following areas: 1) identified 100-year floodplains; 2) areas within 500 feet of perennial waters, springs, wells, and wetlands; and 3) areas within 100 feet of the inner gorge of ephemeral channels on federally managed lands. Where it is not possible to avoid wetland and riparian habitat, crossing-specific plans will be developed. These plans will: 1) demonstrate that vegetation removal is minimized; 2) show how sediment will be controlled during construction and operation within wetland and riparian areas; 3) attempt to intersect the wetland or riparian habitat at its edge; and 4) provide measures to restore habitat and ensure conservation of riparian microclimates.	•	•	•	Federal land only		

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	This plan will be submitted to the appropriate land management agency and approved prior to construction of any portion of the Project within sensitive riparian habitat. Note that this is an agency imposed measure.						
TESWL-15	Anti-perch devices will be required on power poles located within one-quarter mile of prairie dog towns within the BLM's Rawlins Field Office. Note that this is an agency imposed measure.		•		Federal land only		
TESWL-16	Sage-Grouse – If the Kemmerer RMP is amended to allow Proposed Route 4 or Alternatives 4C or 4E to be selected, existing fences within 1 mile of the portion of the Gateway West Project located on lands managed by the Kemmerer RMP will be modified with FireFly Grouse Flight diverters (or a similar product) in order to prevent greater sage-grouse mortalities. Additional site-specific reclamation, such as transplanting sagebrush seedlings within previous disturbed habitats, will also be required to off-set the net loss of sagebrush habitats within the Rock Creek/Tunp management area. Note that this is an agency imposed measure.		•	•	Federal land only		
PALEONTOLOGICAL RESOURCES							
PALEO-1	If significant fossil materials are discovered during Project construction, all surface-disturbing activities in the vicinity of the find will cease until notification to proceed is given by the Authorized Officer. The site will be protected to reduce the risk of damage to fossils and context. Appropriate measures to mitigate adverse effects to significant paleontological resources will be determined by the Authorized Officer.		•	•	•	•	•
PALEO-2	Paleontological resources (as defined by omnibus Public Land Management Act – Paleontological Resources Preservation Section) on federally managed land shall be managed and protected using scientific principles and expertise. Appropriate plans for inventory, monitoring, and the scientific and educational use of these resources shall be developed in accordance with applicable agency laws, regulations and policies.	•	•	•	•		
PALEO-3	Where fossil-bearing sediments are exposed by construction, the sediments must be covered with a 4-inch layer of soil where feasible to reduce unauthorized removal or disturbance of resources.		•	•	•	•	•

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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
PALEO-4	To ensure compliance with the Paleontological Resources Preservation Section of the Public Land Management Act, the Companies' Paleontological Resources Protection Plan for the Project (see PALEO-2) shall specify that: • Monitoring of excavation and grading in sensitive sediments, especially access roads and tower sites, must occur when construction is near or in those geologic formations. • Monitoring of excavations in sensitive sediments, screening the excavated spoils, and processing of bulk sediment samples for microinvertebrate fossils must occur where there is a significant potential for data recovery from those spoils. Monitoring must be performed by a qualified paleontologist and in consultation with a designated paleontologist in each state, NF, or BLM district. The Authorized Officer will designate the appropriate paleontologist depending on project location. Note that this is an agency imposed measure.	•	•	•	Federal land only		
PALEO-5	Field surveys will be completed prior to surface disturbance in areas with potential fossil yields of Class 3, 4, or 5, in accordance with criteria stated in the Paleontological Resources Protection Plan and as required by the land management agency. Note that this is an agency imposed measure.	•	•	•	Federal land only		
GEOLOGIC HAZARDS							
BLA-1, 2	(See description under Public Safety)						
GEO-1	Review the final location of the preferred alternative with affected mine operators and lessees to ensure all measures are taken to protect against subsidence.	•			•	•	•
GEO-2	A site-specific soil analysis shall be conducted prior to construction to verify any areas identified as unstable or marginally unstable on federal lands. A site-specific geotechnical analysis shall be conducted of federal lands prior to construction to locate areas where there is landslide risk. If such areas are identified, the Companies will develop mitigation and submit a report to the appropriate land management agency.	•		•	•		
SOILS							
WQA-1–17	(Described under Water Quality)						

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
SOIL-1	The Wyoming BLM State Reclamation Policy and applicable Agency management plan requirements for soil management will be followed on federal lands in the state of Wyoming.		•	•	•		
SOIL-2	The Companies will submit a Compaction Monitoring Plan for review and Agency approval prior to construction that specifies the conditions under which construction will either not start or will be shut down due to excessively wet soils. Conditions will be measurable in the field and easy to demonstrate to construction workers.	•			•	•	•
SOIL-3	During decommissioning, some obviously compacted areas, such as established newly constructed access roads, will require loosening prior to revegetation. If necessary to re-establish vegetation, the Companies will use a ripper blade, till, or similar instrument to loosen the surface soil layer.			•	•	•	•
SOIL-4	Detrimental soil disturbance such as compaction, erosion, puddling, and displacement will be minimized through implementing measures identified in the SWPPP. Measures may include road ripping, frequent waterbars, cross-ditching (e.g., rolling dips) or other methods to reduce compaction while preventing gully formation. Ripping pattern should be altered to a crossing, diagonal, or undulating pattern of tine paths to avoid concentrated runoff patterns that can lead to gullies.	•	•	•	•	•	•
SOIL-5	The Companies are responsible for monitoring to ensure soil protection is achieved, and providing a monitoring report on reseeding success and/or other methods to stabilize soils to the USFS by the end of each growing season for areas on NFS lands for 3 years or until requirements are met for the applicable permit.		•	•	NFS land only		
SOIL-6	Reclamation of all temporary disturbances on NFS lands (such as road cuts) should include replacement of material to original contours and re-compaction to pre-disturbance compaction percentage (which should be identified during reclamation at adjacent locations to the disturbance). Guidelines for streambank re-compaction to maximize vegetative regrowth and mechanical stability are covered in USACE publication ERDC TN-EMRRP-SR-26.		•	•	•		
SOIL-7	In order to meet Forest Plan Soil Standards on NFS lands, the Reclamation Plan (approved by the USFS) will describe on-site restoration using topsoil salvaging.	•	•	•	•		
SOIL-8	When feasible, reroute all construction or maintenance activities around wet areas so long as the route does not cross into sensitive resource areas and at the approval of the CIC.	•	•	•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
SOIL-9	Limit access of construction equipment to the minimum area feasible, remove and separate topsoil in wet or saturated areas subject to temporary disturbance, and stabilize subsurface soils with a combination of one or more of the following: perform grading to dewater problem areas, utilize weight dispersion mats, and maintain erosion control measures such as surface drilling and back-dragging. After construction is complete, regrade and recontour the area, replace topsoil, and reseed to achieve the success standard desirable plant covers as stated in the Reclamation Plan.	•	•	•	•	•	•
SOIL-10	Vegetation removal and soil disturbances (including temporary road improvements) will be minimized in areas where soil constraints occur. In areas of overland construction, where vegetation removal is required, mowing or cutting and/or back-dragging a cat blade will be the primary method used (also refer to Appendix D –Framework Reclamation Plan).		•	•	•	•	•
SOIL-11	Prior to construction, soils will be evaluated to determine if they are expansive and if they may have potential effects on the proposed facilities. Where they represent a potential hazard, solutions recommended by the Project's geotechnical engineer, such as excavation and replacement of the expansive soils with compacted backfill, will be required. If imported backfill material is used, it must be from a BLM/USFS-approved source and certified as free of invasive weeds and propagules (i.e., seeds and root fragments).	•	•	•	•	•	•
SOIL-12	Limit disturbance of soils and vegetation removal to the minimum area necessary for access and construction.	•	•	•	•	•	•
SOIL-13	Inform all construction personnel, before they are allowed to work on the Project, of environmental concerns, pertinent laws and regulations, and elements of the erosion control plan.	•	•	•	•	•	•
SOIL-14	Slope and berm graded material, where possible, to reduce surface water flows across the graded area.	•	•	•	•	•	•
SOIL-15	Replace excavated materials in disturbed areas and minimize the time between excavation and backfilling.	•	•	•	•	•	•
SOIL-16	Direct the dewatering of excavations onto stable surfaces to avoid soil erosion.	•	•	•	•	•	•
SOIL-17	Re-establish native vegetation cover in highly erodible areas as quickly as possible following construction where determined necessary (refer to Appendix D –Framework Reclamation Plan).		•	•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
SOIL-18	Construction water and water used for dust control will come from permitted sources identified by the Construction Contractor and a map showing the locations of these sources will be provided to the CIC. If the quality of the water is found to be causing any environmental changes (i.e., dying vegetation, excessively hard crusting of soils), the Construction Contractor will test the quality of the water and provide the results to the BLM for review.	•	•	•	•	•	•
SOIL-19	All Project personnel will be educated on dust control procedures.	•	•	•	•	•	•
SOIL-20	To prevent accelerated wind or water erosion on dirt roads, gravel mulches may be added if other mitigation measures are not adequate or if the area is not in a sensitive receptor zone. Gravel of approximately 0.75 to 1.5 inches in diameter should be used and cover a minimum of 90 percent of the soil surface. Slopes steeper than 3:1 may require additional sediment and erosion control structures.	•	•	•	•	•	•
SOIL-21	Surface roughening aids establishment of vegetative cover, reduces runoff velocities, increases infiltration, and reduces erosion by providing sediment trapping. Graded areas with smooth surfaces increase the potential for accelerated erosion; therefore, surfaces should be left in a roughened condition whenever possible.	•	•	•	•	•	•
SOIL-22	On steep slopes (greater than 30 percent) or in areas of concentrated flows (e.g., waterways) erosion control matting or riprap may be used to stabilize the surface and increase infiltration times.	•	•	•	•	•	•
SOIL-23	Areas graveled for stabilization will be inspected to ensure depressions caused by vehicle traffic are filled and runoff is not being directed toward wetlands or other receiving waters.		•	•	•	•	•
SOIL-24	Roughened surfaces should be periodically inspected for rills and washes. Areas exhibiting accelerated erosion will be filled and reseeded as necessary or determined by the BLM or USFS Authorized Officer or his/her designated representative.		•	•	•	•	•
SOIL-25	Construction, operation, and maintenance activities will be restricted when the soil is too wet to adequately support construction or maintenance equipment (i.e., when heavy equipment creates ruts in excess of 4 inches deep, over a distance of 50 feet or more in wet or saturated soils). This standard will not apply in areas with fine-grained soils, which easily form depressions even in dry weather.		•	•	•	•	•
WATER QUALITY							
WET-3	(Described under Streams and Wetlands)						

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
FISH-1	(Described under Fish)						
SOIL-9, 10, and 12-25	(Described under Soils)						
WQA-1	The appropriate NPDES permits for construction activities that disturb one acre or more of land will be obtained from the Department of Environmental Quality and USEPA or their designees.		•	•	•	•	•
WQA-2	NPDES permit requirements will be met. This includes implementing and maintaining appropriate BMPs for minimizing impacts to surface water.		•	•	•	•	•
WQA-3	One or more responsible persons will be designated to manage stormwater issues, conduct the required stormwater inspections, and maintain the appropriate records to document compliance with the terms of the NPDES permit.		•	•	•	•	•
WQA-4	The SWPPPs will be modified as necessary to account for changing construction conditions.		•	•	•	•	•
WQA-5	The SWPPPs will identify areas with critical erosion conditions that may require special construction activities or additional industry standards to minimize soil erosion.		•	•	•	•	•
WQA-6	Stormwater BMPs will be inspected and maintained on all disturbed lands during construction activities, as described in the SWPPP and appropriate NPDES permit.		•	•	•	•	•
WQA-7	Approved sediment and erosion control BMPs will be installed and maintained until disturbed areas meet final stabilization criteria.		•	•	•	•	•
WQA-8	Temporary BMPs will be used to control erosion and sediment at multi-purpose areas (equipment storage yards, fly yards, lay down areas) and substations.		•	•	•	•	•
WQA-9	The construction schedule may be modified to minimize construction activities in rain-soaked or muddy conditions.		•	•	•	•	•
WQA-10	Damaged temporary erosion and sediment control structures will be repaired in accordance with the SWPPP and appropriate NPDES permit.		•	•	•	•	•
WQA-11	Upon completion of construction, permanent erosion and sediment BMPs will be installed along the transmission line within the ROW, at substations, and at related facilities in accordance with the SWPPPs and appropriate NPDES permit.		•	•	•	•	•
WQA-12	In areas of droughty soils, the soil surfaces will be mulched and stabilized to minimize wind erosion and to conserve soil moisture in accordance with the SWPPPs.		•		•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
WQA-13	Construction industry standard practices and BMPs will be used for spill prevention and containment.		•		•	•	•
WQA-14	Construction spills will be promptly cleaned up and contaminated materials hauled to a disposal site that meets local jurisdictional requirements.		•		•	•	•
WQA-15	All multi-purpose areas and fly yards will contain fueling areas with containment of a minimum of 110 percent capacity of the largest vehicle to be refueled therein. Fueling of vehicles will take place within the transmission line ROW under the guidance of the ROW grant/special-use authorization. The SPCC plan will specify BMPs.		•		•	•	•
WQA-16	If an upland spill occurs during construction, berms will be constructed with available equipment to physically contain the spill and prevent migration of hazardous materials toward waterways. Absorbent materials will be applied to the spill area. Dry materials will not be cleaned up with water or buried. Contaminated soils and other materials will be excavated and temporarily placed on and covered by plastic sheeting, or suitable containers, in a containment area a minimum of 100 feet away from any wetland or waterbody, until proper disposal is arranged in appropriately designated and approved areas off-site.		•		•	•	•
WQA-17	If a spill occurs which is beyond the capability of on-site equipment and personnel, an Emergency Response Contractor will be identified and available to further contain and clean up the spill.		•		•	•	•
WQA-18	For spills in standing water or where spilled materials reach water, floating booms, skimmer pumps, and holding tanks will be used as appropriate by the contractor to recover and contain released materials on the surface of the water. Other actions will be taken, as necessary, to clean up contaminated waters.		•		•	•	•
WQA-19	If pre-existing contamination is encountered during operations, work will be suspended in the area of the suspected contamination until the type and extent of the contamination is determined. The type and extent of contamination; the responsible party; and local, state, and federal regulations will determine the appropriate cleanup method(s) for these areas.		•		•	•	•
WQA-20	The SPCC Plan will include details on the types and quantities of absorbent and protective materials (e.g., visqueen, booms) that must be readily available to construction personnel and requirements for the restocking of materials.		•		•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
WQA-21	Storage of materials such as fuels, other petroleum products, chemicals, and hazardous materials including wastes will be located in upland areas at least 500 feet away from streams, 400 feet for public wells, and 200 feet from private wells.		•		•	•	•
WQA-22	Pumps and temporary fuel tanks for the pumps will be stored in secondary containment. Containment will provide a minimum volume equal to 110 percent of the volume of the largest storage vessel located in the yard.		•		•	•	•
WQA-23	Avoid placement of road bed material in channels (perennial, intermittent or ephemeral). Road bed material contains considerable fines that would create sedimentation in coarse cobble dominated stream channels. Even in seasonally dry reaches those fines could be transported during flow periods and negatively impact fish spawning reaches below.	•	•	•	•	•	•
WQA-24	On federal lands, consult with appropriate land management agency staff prior to siting and design for stream crossings (location, alignment, and approach for culvert, drive-through, and ford crossings). This may include a hydrologist, engineer and, for perennial and many intermittent streams, an aquatic biologist.	•			•		
WQA-25	All culverts on NFS lands, both permanent and temporary, shall be designed and installed to meet desired conditions for riparian and aquatic species as identified in the applicable Forest Plan. Culverts should not be hydraulically controlled. Hydraulically controlled culverts create passage problems for aquatic organisms. Culvert slope should not exceed stream gradient and should be designed and implemented (typically by partial burial in the streambed) to maintain streambed material in the culvert.	•	•	•	NFS land only		
WQA-26	Culvert sizing on NFS lands should also comply with Guidance for Aquatic Species Passage Design, USFS Northern Region & Intermountain Region.	•	•	•	NFS land only		
WQA-27	On non-federal lands, culvert placement should comply with state BMPs.		•	•		•	•
WQA-28	Migration of construction-related sediment to all adjacent surface waterbodies will be prevented.				•	•	•
WQA-29	If the Project proposes to obtain water from wells or surface water sources to suppress dust, written approval from the landowner or regulatory agency will be obtained prior to appropriation.		•				•
WQA-30	In the event of a spill, cleanup will be immediate. The Construction Contractor will keep spill kits in their vehicles to allow for quick and effective response to spills. Items to be included in the spill kit at a minimum are:		•		•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	• Protective clothing and gloves • Absorptive clay, “kitty litter,” or other commercial absorbents • Plastic bags and a bucket • Shovel • Fiber brush and screw-in handle • Dust pan • Caution tape • Highway flares (use on established roads only) • Detergent						
WQA-31	The response to a hazardous material spill will vary with the size and location of the spill, but general procedures include: • CIC and BLM, BOR, or USFS notification • Traffic control • Dressing the cleanup team in protective clothing • Stopping any leaks • Containing spilled material • Cleaning up and removing spilled pesticide and contaminated absorptive material and soil • Transporting spilled pesticide and contaminated material to an authorized disposal site		•		•	•	•
WQA-32	Physical response actions are intended to ensure all spills are immediately and thoroughly contained and cleaned up. However, the first priority in responding to any spill is personal and public safety. Construction personnel will be notified of evacuation procedures to be used in the event of a spill emergency, including evacuation routes. In general, the first person on the scene will: • Attempt to identify the source, composition, and hazard of the spill. • Notify appropriately trained personnel immediately. • Isolate and stop the spill, if possible, and begin cleanup (if it is safe). • Initiate evacuation of the area, if necessary. • Initiate reporting actions.		•	•	•	•	•

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1	2	3-5			6-8		
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WQA-33	Persons should only attempt to cleanup or control a spill if they have received proper training and possess the appropriate protective clothing and cleanup materials. Untrained individuals should notify the appropriate response personnel. In addition to these general measures, persons responding to spills will consult Appendix P – Framework Hazardous Materials Management Plan, Appendix R – Operations, Maintenance, and Emergency Response Plan, and the MSDSs or USDOT Emergency Response Guidebook (to be maintained by the Construction Contractor onsite during all construction activities), which outlines physical response guides for hazardous materials spills.		•	•	•	•	•
WQA-34	In general, expert advice will be sought to properly cleanup major spills. After contaminated soil is recovered, all machinery used will be decontaminated, and recovered soil will be treated as hazardous waste. Contaminated cleanup materials (absorbent pads, etc.) and vegetation will be disposed of in a similar manner. For spills, cleanup may be verified by sampling and laboratory analysis at the discretion of the Companies.		•	•	•	•	•
WQA-35	If construction activity occurs within a wetland with standing water or a flowing stream, prior to construction, absorbent booms will be placed on the water surface either around or downstream of the construction zone. In addition to this measure, cleanup materials, including absorbent spill pads and plastic bags, will be placed onsite at flowing streams and "wet" wetlands when construction is occurring within 200 feet of these areas (also refer to Appendix F –Framework Stormwater Pollution Prevention Plan).		•	•	•	•	•
WQA-36	Emergency spill response kits will be maintained at all locations where hazardous materials are stored, in sufficient quantities based on the amount of materials stored onsite. Spill response equipment should be compatible with types of materials stored onsite. Spill response equipment should be inventoried regularly to ensure spill response equipment is adequate for the type and quantities of materials being used. The following equipment, are examples of spill response equipment for use in cleanup situations: • Shovels • Absorbent pads/materials • Personal protective gear • Medical first-aid supplies • Bung wrench (nonsparking) • Phone list with emergency contact numbers		•	•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	• Storage containers • Communications equipment						
WQA-37	The Construction Contractor and subcontractors shall provide spill prevention and response training to appropriate construction personnel. Persons accountable for carrying out spill response activities will be designated prior to construction and informed of their specific duties and responsibilities with respect to environmental compliance and hazardous materials. The training shall inform appropriate personnel of site-specific environmental compliance procedures. Training of personnel should be completed at least once a year. All training events should be documented, including the date and names of those personnel in attendance. These records shall be maintained with the SPCC Plan and/or Hazardous Materials Management Plan. At a minimum, this training shall include the following: • An overview of regulatory requirements • Methods for the safe handling/storage of hazardous materials • Spill prevention procedures • Emergency response procedures • Use of personal protective equipment • Use of spill cleanup equipment • Procedures for coordinating with emergency response teams • Procedures for notifying agencies • Procedures for documenting spills • Identification of sites/areas requiring special treatment, if any		•	•	•	•	•
WQA-38	Notification and documentation procedures for spills that occur during Project construction, operation, or maintenance will conform to applicable federal, state, and local laws and regulations. Adherence to such procedures will be the top priority once initial safety and spill response actions have been taken.		•	•	•	•	•
WQA-39	Notification will begin as soon as possible after discovery of a spill. The individual who discovers the spill will contact the Contractor's supervisory personnel and the CIC. If the Construction Contractor determines the spill may seriously threaten human health or the environment, he/she will orally report the discharge as soon as possible, but no later than 24 hours from the time they become aware of the circumstances, as directed below. A		•	•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
	written report must be submitted to Wyoming or Idaho Department of Environmental Quality (DEQ) within 15 days. Prior to initiating notification, the Construction Contractor (or individual initiating notification) should obtain as much information as possible, including: • current threats to human health and safety, include known injuries, if any • spill location, including landmarks and nearest access route • reporter's name and phone number • time spill occurred • type and estimated amount of hazardous materials involved • potential threat to property and environmental resources, especially streams and waterways • status of response actions						
WQA-40	The following mandatory notifications will be made by the Construction Contractor. These numbers should be documented in the SPCC plan, along with the contact information for the cleanup contractor. Select and notify the appropriate government agencies based on geographic location of the spill site. • Wyoming DEQ (24 hours) at (307) 777-7781. • Idaho Communication Center (24 hours) at (800) 632-8000 or (208) 846-7610. • If spill threatens human health, call 911, and the appropriate county response center. • National Response Center (NRC) (800) 424-8802. The NRC should be notified of a reportable spill as required by 40 CFR 110, 40 CFR 117, and/or 49 CFR 171. The Construction Contractor will verify and update these emergency phone numbers before and during construction. The Construction Contractor (or other person in charge) will notify the CIC of all spills or potential spills within construction areas.		•	•	•	•	•
WQA-41	When a spill poses a direct and immediate threat to health and safety and/or property, the land management agency and landowners potentially affected by a spill will be notified directly by the Construction Contractor. Immediate notification of land management agencies and landowners is required for all situations in which the spill poses a direct and immediate threat to health and safety and/or property. Failure to report a spill could result in substantial penalties and fines.		•	•	•	•	•

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EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
WQA-42	The Construction Contractor will maintain records for all spills. State and federal agencies that have been verbally notified of a spill will be informed in writing within 10 days for state agencies and 30 days for federal agencies.		•	•	•	•	•
WQA-43	The Construction Contractor shall record spill information in a daily log. The following is a list of items that should be included in the daily log (as appropriate, based on the spill incident): • time and date of each log entry • name of individual recording log entry • list of all agencies notified, including name of individual notified, time, and date • type and amount of material spill • resources affected by spill • list of response actions taken, including relative success • copies of letters, permits, or other communications received from government agencies throughout the duration of the spill • copies of all outgoing correspondence related to the spill • photographs of the response effort (and surrounding baseline photographs if relevant)		•	•	•	•	•
WQA-44	During the Project's operation and maintenance phase, the Companies will ensure its facilities, personnel, and contractors comply with federal, state, and local laws and regulations pertaining to the use, storage, transport, and disposal of hazardous materials and adhere to required emergency response and cleanup procedures in the event of a hazardous material spill. The Companies and all operations and maintenance subcontractors shall develop hazardous materials management and response plans and properly train employees for handling, packaging, and shipping hazardous materials and responding to hazardous materials spills or emergency events.			•	•	•	•
WQA-45	Reclaim stream channels/bottoms and wetlands to their approximate preconstruction configuration/contours, unless the original stream bank contours are excessively steep and/or unstable and a more stable final contour can be specified or where permanent stream crossings must be created to maintain access throughout the life of the Project.	•	•	•	•	•	•

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WQA-46	Stabilize stream banks, wetlands, and adjacent upland areas by establishing permanent erosion control measures and vegetation cover after the completion of construction (refer to Appendix N – Framework Erosion, Dust Control, and Air Quality Plan and Appendix D – Framework Reclamation Plan).		•	•	•	•	•
WQA-47	Use permanent waterbars, if needed, on slopes above streams or wetland boundaries, on travel routes, and along the ROW to minimize sediment flow from adjacent uplands into the stream or wetland.		•	•	•	•	•
WQA-48	Remove all prefabricated equipment pads, swamp mats, and geotextile fabric used for stream and wetland crossings on completion of construction.		•		•	•	•
LAND USE							
TRANS-5	(See description under Transportation)						
LU-1	Signs shall be posted at access points to access roads where public access is restricted by a land use plan, and on private, state, and Tribal lands at the request of the landowner, agency, or Tribal government. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage shall be maintained and replaced as part of the routine maintenance.			•	•	•	•
AGRICULTURE							
AGRI-1	Consult with the Farm Service Agency and landowners to determine how construction may affect the CRP status of the land currently enrolled in CRP.	•					•
TRANSPORTATION							
FIRE-6	(See description in Public Safety (Blasting, Fire, Contamination)						
TRANS-1	A Final Traffic and Transportation Management Plan will be developed and implemented to provide site-specific details showing how the Project will comply with the EPMs listed in this attachment. The Final Traffic and Transportation Management Plan will be submitted to, and approved by, the appropriate federal, state, and local agencies with authority to regulate use of public roads, and approved prior to the issuance of a Notice to Proceed with construction.	•			•	•	•

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TRANS-2	If a construction method requires the closure of a state- or county-maintained road for more than 1 hour, a plan will be developed to accommodate traffic as required by a county or state permit.	•	•			•	•
TRANS-3	On county- and state-maintained roads, caution signs will be posted on roads, where appropriate, to alert motorists of construction and warn them of slow traffic. Traffic control measures such as traffic control personnel, warning signs, lights, and barriers will be used during construction to ensure safety and to minimize traffic congestion.	•	•			•	•
TRANS-4	To reduce traffic congestion and roadside parking hazards, an equipment yard will be provided for primary parking for employee personal vehicles.	•	•		•	•	•
TRANS-5	Unauthorized vehicles will not be allowed within the construction ROW or along roadsides near the ROW.		•		•	•	•
TRANS-6	Construction vehicles will follow a 25 mph speed limit on unposted project roads.		•		•	•	•
TRANS-7	Landowners will be notified at least 48 hours prior to the start of construction within 0.25 mile of a residence.		•		•	•	•
TRANS-8	Emergency vehicle access to private property will be maintained.		•				•
TRANS-9	Roads in residential areas will be restored as soon as possible, and construction areas near residences will be fenced off at the end of the construction day, without blocking residential traffic.		•				•
TRANS-10	Roads negatively affected by construction and as identified by the applicable jurisdictional agency and/or landowner will be returned to preconstruction condition. The method of preconstruction condition documentation will be coordinated by the Construction Contractor and the applicable jurisdictional agency and/or landowner.		•		•	•	•
TRANS-11	Roads developed specifically for this project that are identified by the Companies as no longer necessary will be reclaimed as specified in the Final Reclamation Plan. Culverts will be removed.		•		•	•	•
TRANS-12	The Companies will attempt to identify existing two-track trails as preferred access roads for construction when existing maintained (e.g., gravel or asphalt) roads are not available.	•	•		•	•	•
TRANS-13	Roads will be designed so proper drainage is not impaired and roads will be built to minimize soil erosion. Consult with appropriate Agencies during the design stage.	•	•	•	•	•	•

Table M-1. Environmental Protection Measures

1	2	3-5			6-8		
		Application Phase			Applicable to Land Ownership		
EPM Number	Environmental Protection Measures	Design and Engineering	Construction	Operations and Maintenance	Federal Land and all Land in Wyoming and Idaho Segments 6, 8, and 9	State Land in Idaho	Private Land in Idaho Segments 4, 5, 7, and 10
TRANS-14	Access roads built for the Project on federal lands shall be closed to the public unless otherwise agreed upon with the land management agency. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage and road closure measures shall be evaluated during routine visits and maintained or replaced as necessary as part of routine maintenance. Access roads constructed solely for use by the Companies will be maintained by the Companies as needed for the Companies' use in accordance with the ROW grants/special use authorization.	•	•	•	•		
TRANS-15	Roads to be abandoned may be left intact through mutual agreement of the land management agency, landowner, the tenant, and the Companies, unless located in flood areas or drainage hazard areas or otherwise restricted by federal, state, or local regulations.	•	•	•	•	•	•
TRANS-16	All temporary culverts and associated fill material will be removed from stream crossings after construction. All permanent culverts will be engineered by the Construction Contractor and approved by the Companies prior to installation.		•		•	•	•
TRANS-17	The road or highway within the ROW corridor shall be used to the maximum extent possible for construction and maintenance of the new ROW.	•	•	•	•	•	•
TRANS-18	To help set public expectations for when temporary access roads are decommissioned, signs shall be posted on all temporary roads and overland access routes identifying them as reclamation areas. Signs will state "Restoration in Progress – No Vehicle Traffic Allowed."		•	•	•	•	
TRANS-19	During wet road conditions, any ruts deeper than 4 inches remaining on the roads from the Project will be repaired.	•	•	•	•		
AIR QUALITY							
FISH-3	(Described under Fish)						
TESWL-12	(Described under TES-Wildlife)						
SOIL-18 and 19	(Described under Soils)						
AIR-1	Minimize idling time for diesel equipment whenever possible.		•		•	•	•
AIR-2	Ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use.		•		•	•	•

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AIR-3	Prohibit engine tampering to increase horsepower.		•		•	•	•
AIR-4	Reduce construction-related trips as feasible for workers and equipment, including trucks.		•		•	•	•
AIR-5	Dust suppression techniques will be applied, such as watering construction areas or removing dirt tracked onto a paved road as necessary to prevent safety hazards or nuisances on access roads and in construction zones near residential and commercial areas and along major highways and interstates.		•		•	•	•
ELECTRICAL ENVIRONMENT							
EE-1	During final design, limit the conductor surface gradient in order to meet the IEEE Radio Noise Guideline.	•	•			•	•
EE-2	During construction, identify objects such as fences, metal buildings, pipelines, and other metal objects within or near the proposed ROW that have the possibility for induced potentials and currents and implement electrical grounding of these objects according to the utility's and National Electric Code standards.		•		•	•	•
EE-3	During final design and construction, identify areas where large equipment is anticipated and provide sufficient conductor clearance to ground to meet the NESC 5 mA rule or limit size or access of large equipment.	•	•			•	•
PUBLIC SAFETY (Blasting, Fire, Contamination)							
WQA-13 - 20	(Described under Water Quality)						
WEED-24, 25	(Described under Weeds)						
WILD-11	(Described under Wildlife)						
BLA-1	The Blasting Plan will identify blasting procedures including safety, use, storage, and transportation of explosives that will be employed where blasting is needed, and will specify the locations of needed blasting.		•		•	•	•
BLA-2	All blasting will be performed by registered licensed blasters who will be required to secure all necessary permits and comply with regulatory requirements in connection with the transportation, storage, and use of explosives, and blast vibration limits for nearby structures, utilities, wildlife, and fish (where blasting is conducted in waterbodies).		•		•	•	•

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BLA-3	Appropriate flags, barricades, and warning signals will be used to ensure safety during blasting operations. Blast mats will be used when needed to prevent damage and injury from fly rock.		•		•	•	•
BLA-4	Blasting in the vicinity of pipelines will be coordinated with the pipeline operator, and will follow operator-specific procedures, as necessary.		•		•	•	•
BLA-5	Damages that result from blasting will be repaired or the owner fairly compensated.		•		•	•	•
BLA-6	Proper blasting techniques, including proper cover of charges, will be followed.		•		•	•	•
BLA-7	Matting will be used in rock blasting operations to minimize and control dust.		•		•	•	•
BLA-8	Notification of blasting activities will be provided to nearby residents.		•		•	•	•
BLA-9	The Construction Contractor will prepare site specific blasting plans.	•	•		•	•	•
BLA-10	The Blasting Plan for the proposed Project will also stipulate the following: • Explosives will not be stored on federal land without prior written permission from the land-management agency. Copies of this permission will be posted on each magazine. • Seventy-two hours advance notice of blasting activities will be given to the land-management agency, railroads, highway departments, and local communities; occupants of nearby residences, buildings, and businesses; and local farmers. • Warning signs will be erected and maintained at all approaches to the blast areas and flaggers will be stationed on all roadways passing within 1,000 feet of blasting activities. • Explosives will not be primed or fused until just before use. • Blasting will take place during daylight hours only and will be monitored with three axis seismographs to ensure safe vibration levels are not exceeded. • Vibration measured as peak particle velocity will not exceed 4 inches per second adjacent to an underground pipeline and 2 inches per second for any aboveground structure (including water wells).	•	•		•	•	•
FIRE-1	Train all personnel about the measures to take in the event of a fire including; fire dangers, locations of extinguishers and equipment, emergency response, and individual responsibilities for fire prevention and suppression.		•	•	•	•	•

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FIRE-2	Equip all construction equipment operating with internal combustion engines (including off-highway vehicles, chainsaws, generators, heavy equipment, etc.) with spark arresters. Qualified spark arresters will be in a maintained and nonmodified condition and meet U.S. Department of Agriculture Forest Service Standard 5100-1a, or the Society of Automotive Engineers Recommended Practices J335 or J350. Refer to 43 Code of Federal Regulations §8343.1.		•	•	•	•	•
FIRE-3	Restrict motorized equipment, including worker transportation vehicles, to the designated and approved work limits. Operate all vehicles on designated roads or park in areas where vegetation is less than 8 inches tall. Vehicles, including the undercarriages, will be cleared of vegetation accumulations and checked periodically to ensure no buildup of flammable vegetation.		•	•	•	•	•
FIRE-4	Require all motor vehicles and equipment to carry, and individuals using handheld power equipment to have, specified fire prevention equipment. Carry shovels, water, and fire extinguishers on all equipment and vehicles. Equipment will carry extinguishers rated ABC-10 pound minimum and vehicles will carry ABC-2.5 pound minimum.		•	•	•	•	•
FIRE-5	Provide a list of equipment capable of being adapted to fighting fires to local fire protection agencies.		•	•	•	•	•
FIRE-6	Notify the appropriate fire suppression agencies of scheduled road closures.		•	•	•	•	•
FIRE-7	Prohibit burning of slash, brush, stumps, trash, explosives storage boxes, or other Project-generated debris unless authorized by the applicable land management agency.		•	•	•	•	•
FIRE-8	Designate a Fire Guard on each construction crew prior to the start of construction activities each day and provide a communications system for maintaining contact with fire control agencies.		•	•	•	•	•
FIRE-9	The Companies shall comply with fire restrictions and/or waivers as applicable.		•	•	•	•	•
FIRE-10	If a fire spreads beyond the suppression capability of workers with these tools, all will cease fire suppression action and leave the area immediately via pre-identified escape routes.		•	•	•	•	•
FIRE-11	Initiate fire suppression actions in the work area to prevent fire spread to or on federally administered lands. If fire ignitions cannot be prevented or contained immediately, or it may be foreseeable to exceed the immediate capability of workers, the operation must be modified or discontinued. No risk of ignition or re-ignition will exist on leaving the operation area.		•	•	•	•	•

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FIRE-12	Prior to any operation involving potential sources of fire ignition from vehicles, equipment, or other means, review weather forecasts and potential fire danger. Prevention measures to be taken each workday will be included in the specific job briefing. Consideration for additional mitigation or discontinuing the operation must be given in periods of extreme wind and dryness.		•	•	•	•	•
FIRE-13	Operate welding, grinding, or cutting activities in areas cleared of vegetation within range of the sparks for that particular action. A spark shield adequate for the sparks may be used to prevent sparks from carrying. A spotter equipped with a round-nose shovel and two ABC-rated 5-pound fire extinguishers and a 5-gallon backpack waterpump is required to watch for ignitions during, and one hour after, the activity. Water may be used to wet down surrounding vegetation but does not take the place of an adequately cleared area and spark shield.		•	•	•	•	•
FIRE-14	No smoking will be allowed while operating equipment or while walking or working in areas with vegetation.		•	•	•	•	•
FIRE-15	Smoke only in cleared areas.		•	•	•	•	•
FIRE-16	In areas where smoking is allowed, completely extinguish all burning tobacco and matches and discard them in ash trays, not on the ground.		•	•	•	•	•
FIRE-17	Do not allow any fires or barbecues on the transmission line ROW, at material yards, substations, access roads, or other construction areas.		•	•	•	•	•
FIRE-18	Clear away all flammable material to a minimum of 10 feet, including snags (fallen or standing dead trees) from areas of operation where a spark, fire, or flame could be generated.		•	•	•	•	•
FIRE-19	If a fire does start by accident, take immediate steps to extinguish it (if it is safe to do so) using available fire suppression equipment and techniques taught at field crew emergency response training provided by the Construction Contractor or the Companies.		•	•	•	•	•
CON-1	All construction staff will be trained on the types of contamination that could be encountered and how to respond if contamination is encountered.		•		•		
NOISE							
NOISE-1	Identify and provide a public liaison person before, and during, construction to respond to concerns of neighboring receptors, including residents, about construction noise disturbance.		•	•	•	•	•

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NOISE-2	Establish a toll-free telephone number for receiving questions or complaints during construction, and develop procedures for responding to callers.		•		•	•	•
NOISE-3	Implement and maintain a noise complaint review process to deal with residents' or other potential queries and complaints as they arise. Such complaints will be logged and investigated on an individual basis to facilitate resolution of the issue of concern.		•		•	•	•

1/ TESWL-3 has been offered by the Companies; however, although the Companies are encouraged to protect all prairie dog towns, formal black-footed ferret surveys within those towns will no longer be required by the BLM.
AGRI – agriculture; AIR – air quality; BLA – blasting; CON – contamination; CR – cultural resources; EE – electrical environment; FIRE – fire; FISH – fish; G – general; GEO – geologic hazards; LU – land use; NOISE – noise; OM – operations and maintenance; PALEO – paleontological resources; REC – reclamation; SOIL – soils; TESPL – threatened, endangered, and sensitive (TES) plants; TESWL – TES wildlife; TRANS – transportation resources; VEG – vegetation; VIS – visual; VR – visual resources; WEED – weeds; WET – streams and wetlands; WILD – wildlife; WQA – water quality

"Note that this is an agency imposed measure." – This statement pertains to EPMs required by the agencies in the FEIS that the Companies believe are not necessary but will implement as agency requirements.