

COMMENT(S)

RESPONSE(S)

B25

Oregon Trail Trader

Boardman to Hemingway Line Project

PO Box 655

Vale, OR 97911-0655

RE: Draft EIS for the Boardman to Hemingway 500kV transmission line project. I support the "No Line Alternative."

My statements are based upon my experience in the following areas:

We own and run the Oregon Trail Trader which is a firearms and sporting goods store in La Grande. Our business will be negatively impacted by this development due to its impacts on tourism and wildlife.

1. We make annual donations of pheasants to the Ladd Marsh Wildlife area and hunt, bird watch and walk at the refuge. I am aware of the wildlife utilizing the refuge and the movements of the wildlife in and out of the refuge.
2. For the past 4 years I have spent between 10 and 20 hrs. each week researching, developing educational materials, providing education and consultation with groups and individuals impacted by energy developments.
3. I have attended the meetings of the Energy Facility Siting Counsel in Oregon for the past three years and am aware of their requirements related to the siting of energy developments and their impacts.
4. I have been hunting deer, elk and upland game birds in the Starkey area for over 30 years. I am concerned regarding the reduced numbers of wildlife resulting in a reduce number of hunters and how that impacts the budget of the Oregon Department of Fish and Wildlife as well as businesses dependent upon users of those resources.

B25a

Idaho Power will negotiate with affected land owners to ensure that property owners are appropriately compensated if any private property interests are impaired by the final location.

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

B25a

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B25	Oregon Trail Trader (cont.)
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I have the following concerns with the document.

- B25b 1. The EIS needs to include reference to and a discussion of the issues identified in the Feb. 7, 2014 letter from the Director of the Office of Environmental Policy and Compliance of the United States Department of the Interior to the National Telecommunications and Information Administration in the Department of Commerce. The concerns identified in this letter are relevant to the impacts of the proposed high voltage power line including but not limited to it needing to show consistency with Executive Order 13186, and protection of birds covered by the Migratory Bird and Bald and Golden Eagle Protection Laws. See: <http://1.usa.gov/t1jn3CZg>
- B25c 2. A costs vs benefits analysis needs to be completed. This needs to include economic, social and environmental costs and place a monetary value on these compared to the benefits to electric companies and wind developers.
- B25d 3. The draft EIS fails to do an economic impact analysis for the areas dependent upon logging, agriculture and wildlife resources. Tourists come to La Grande and other areas along this proposed high voltage line to hunt big game, game birds, fish, ride bicycles, ride horseback, camp, etc. This area has a significant draw due to the unspoiled rural landscape and the wildlife resources present. The EIS fails to identify the cultural significance and lost revenue due to the placement of a high voltage power line through this area.
- B25e 4. The impacts of erosion and increased water flowing down into the lowlands will result in damage to property cropland and aquatic habitat as well as kill fish. There is no analysis of quantity and value of soil and water impacts outside the ROW.
- B25f 5. The Wallowa-Whitman Resource Management Plan requiring the maintenance of soil productivity and stability over all other guidelines precludes the development of a high voltage power line in this public resource as the transmission line will eliminate the production of timber in the right of way and will cause instability and erosion of the soil during construction, maintenance and operation of the line.

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- B25b The analysis of migratory birds and eagles has been updated for the Final EIS in collaboration with the cooperating agencies to include additional analysis and information on direct and indirect impacts from the B2H Project.
- B25c The National Environmental Policy Act does not require an Environment Impact Statement to include formal cost-benefit analysis; economic, social, and environmental impacts must be disclosed, but these impacts are not required to be discussed in monetary terms.
- B25d The economic analysis in Section 3.2.17 has been revised based on updated based on additional land use data discussed in the revised version of Sections 3.2.6 through 3.2.11. The economic analysis discusses potential impacts to agricultural, timber, and recreational resources.
Once the location for the transmission line route is identified, Idaho Power will coordinate with property owners to obtain rights-of-way through mutual agreements. Idaho Power will negotiate modifications to the line's design and the location of towers and access roads and compensate land owners for any unavoidable damages.
- B25e The Applicant has committed to updated design features and selective mitigation measures designed to minimize anticipated potential B2H Project impacts from new access roads and sediment transport to streams from upland locations. B2H Project design features and selective mitigation measures that would minimize impacts on fish resources include spanning of riparian communities and water courses, using existing access roads, and selective removal of vegetation. Refer to Section 3.2.6 of the Final EIS for analysis of impacts.
Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.
- B25f Comment noted. This type of potential effects is addressed in the analysis in the Final EIS, Section 3.2.1.

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B25 Oregon Trail Trader (cont.)

- B25g 6. The EFSC rules do not contain objective criteria for making decisions regarding public resources. The EIS needs to establish what factors would indicate that a development will have “no significant impact”.
- B25h 7. Diverting electricity through a high voltage line rather than continuing to use smaller lines will increase the threat of a terrorist or others being able to sabotage the electrical system.. How will the security of the electric transmission system be impacted by this new transmission line?
- B25i 8. The Energy Facility Siting Council does not enforce federal statutes or require mitigation for predictable wildlife fatalities to migratory birds or golden eagles resulting from energy developments. The EIS needs to determine likely wildlife fatalities and displacement impacts and establish a cost of these impacts as well as required mitigation.
- B25j 9. The EIS fails to establish what the cumulative impacts are on wildlife including the impacts of other causes of mortality such as vehicles, windows, predators and others in combination with that predicted for the power line will mean to different species. The 10 or more golden eagles which have been killed at the Elkhorn wind development along with reductions in nest sites and observations should provide useful and necessary data for the analysis.

SPECIFIC COMMENTS RELATED TO SECTIONS OF THE DRAFT EIS:

B25k **NEED**—The EIS fails to document a need for the transmission line since it does not include an analysis of the impact of requirements for energy efficient appliances, building codes which conserve more electricity, increased practical methods and availability of storage of electricity individual owned energy generation devices, etc.. Due to these and other factors impacting the need for electricity and which will stabilize the flow of intermittent energy sources such as wind and solar, there is no current need for a new 500 kv transmission line. In fact, the most likely outcome is that there will be a decrease in the need for this line over time as individuals and communities generate an increasingly large amount of their own energy. The

- B25g This EIS does not specifically address requirements of the state EFSC process. The B2H Project is being permitted concurrently through the Oregon Department of Energy and EFSC. The BLM assumes the B2H Project will comply with land use ordinances and state preservation goals as dictated by the Oregon Department of Energy.
- B25h Impacts on public health and safety are presented in Chapter 3, Section 3.2.18.
- B25i The eagle and migratory bird analyses have been revised for the Final EIS in Section 3.2.4 to include new information on the direct and indirect effects from the B2H Project, as well as updated mitigation measures.
- B25j It is reasonable to assume that construction of the B2H Project, by strengthening the transmission backbone in the region, will spur additional generation projects that are either in early stages of development or are not yet underway. Even if these projects are not yet individually known, their likely addition can be considered reasonably foreseeable and therefore should be included in the cumulative impacts analysis. With the potential for energy development in the region, BLM must recognize the connected and cumulative effects that these projects have upon one another and include that analysis in the Final EIS. This information is critical to development of an appropriate suite of mitigation efforts.

Recommendation: The Bureau should analyze the cumulative effects of reasonably foreseeable energy development that is likely to occur as a result of the proposed B2H Project.
- B25k It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized by the Public Utilities Commission. The responsibility of BLM and other land-management agencies is to respond to the application for right-of-way across lands it administers.

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

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B25	Oregon Trail Trader (cont.)
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B25k need analysis needs to incorporate the current statutes which will impact the need for commercially generated electricity including the statute which will require electric utilities to develop methods to store electricity, increased conservation requirements, increased subsidies for energy efficiency, and the other 40 plus subsidies, grants, rules and requirements that will impact the need for electricity in Oregon and Idaho. The Northwest Power Act does not allow utilities to require customers to pay for distribution lines when there is no need for the line and there is adequate power available to meet the current and future needs of it's customers. "Electricity Supply and Oregon" (Attachment 1) provides documentation of slow to no growth, Idaho power only serves 1% of Oregon customers. Oregon wind developers have not assessed the need for their energy in Oregon, and as a result, they have built more wind developments than can be handled by the infrastructure can handle or their customers can use. Oregon's electricity users are being asked to pay for a high voltage line which does not not serve Oregonians, but rather is for the primary purpose of moving electricity out of the state and into another market. (Attachment 2 and 3) documents wind developers failure to identify a need or infrastructure capable of efficiently transporting the energy. This is a problem of the developer's own making and it should not fall on Oregon ratepayers to pay to resolve it.

SOIL IMPACTS

B25l Page 3-10 What methods will be incorporated: to protect Paleontological Resources located below ground level?

Pages: 3-14

B25m The EIS needs to include criteria for evaluation of what constitutes an acceptable level of adverse impacts to soil. It is necessary to describe acceptable impacts in order to determine the loss of value that will result from this development. The EFSC rules provide no quantifiable

B25l Monitoring of ground-disturbing activities would occur in areas having moderate-high sensitivity for paleontological resources

B25m This EIS does not specifically address requirements of the state EFSC process. The B2H Project is being permitted concurrently through the Oregon Department of Energy and EFSC. The BLM assumes the B2H Project will comply with land use ordinances and state preservation goals as dictated by the Oregon Department of Energy.

B25m Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment.

COMMENT(S)

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B25 **Oregon Trail Trader (cont.)**

B25m [evaluative criteria for making this determination. The term “not likely to result in a significant adverse impact on soils” provides no guidance to establish what impacts would be considered “significant”. The EFSC has never found that there would be “significant” impacts to soil. The EIS needs to identify criteria in order to protect the soil resources which will be impacted by this line.

B25n [The soils analysis needs to extend beyond ½ mile beyond the center line of the ROW and 50 feet beyond the center line of roads. Water flowing from the ROW will travel much further than ½ mile and impact soils beyond this area.

B25o [Page 3-27: Building is not allowed by Union County Land Use Plan due to the instability of soils and the existence of Alluvial Fan soils outside the City of Union. It appears the transmission line will go through some of this. These areas can be seen via airplane. The EIS needs to include a review of the areas identified in the Union County land use planning documents to assure there will be no construction in these “no build” zones.

B25p [Page 3-29, Table 3-4. The use of only the construction and operations disturbance area in no way reflects the actual slopes and resulting soil impacts. The table indicates 0 for slopes greater than 25% in Union County. This proposed power line is going through the Blue Mountains. La Grande is surrounded by mountains on all sides. This document shows no slopes greater than 25%, which documents the analysis area is not indicative of nor does it accurately reflect soil slopes and impacts due to those slopes. Limiting the evaluation area to the area of construction and operation disturbance with no reference to where the water goes when it leaves the construction site is misleading and meaningless. Clearly, runoff will be moving through multiple areas with slopes exceeding 25%. Water will move out of the construction site. When it does, it will be flowing down steep hills, moving soil and eroding the landscape until it enters the

B25n [The BLM believes the study corridor established for earth resources is adequate.

B25o [The Final EIS has been updated to expand the discussion of compliance with existing land use plans, local permit requirements

B25p [Comment noted. This type of potential effects is addressed in the analysis in the Final EIS.

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B25 Oregon Trail Trader (cont.)

B25q [nearest waterway. The analysis needs to include information regarding the general characteristics of the area the runoff will flow through and the significance of impacts. The analysis of soils and erosion potential needs to include data on average and maximum wind velocity in the area due to erosion resulting from wind action.

B25r [Soil impacts need to be changed in the following ways: a. The use of the term “short-term” impacts to describe the construction impacts is not correct. In Union County most of the impacted land (88%) is arid stoney-rocky soil. Revegetation efforts in this type soil will not be completed within the 3 year period as defines “short-term” impacts. b. Inclusion of only the footprint of the development defined as “permanent structures and roads” as permanent impacts is not correct. Any area that will not be restored within 3 years is a permanent impact For example, areas in the right of way that will not be allowed to produce timber for the duration of the project need to be included as permanent impacts. Indirect impacts such as ongoing erosion in the area surrounding the project also constitute a long-term impact due to the interaction of soil type, wind, and lack of water during a large part of the year and significant land slopes.

B25s [Paleontological Resources: Page 3-34, Table 3-9
A mastodon tusk was unearthed near La Grande. Information on Union County is missing from the analysis. Union County has a high probability of fossils as evidenced by the following:

The Stockhoff Quarry has been used for over 10,000 years. It is likely that archaeological items associated with this site extend into the area of the proposed transmission line. The EIS needs to document whether or not there will be impacts associated with these resources. The potential for Paleontological Resources being impacted if the transmission line crosses this area is significant.

3.2.2 Water Resources

B25q [The effects of the B2H Project on soils susceptible to wind erosion are included in the analysis. However, the BLM does not agree that wind velocity data are needed in this assessment.

B25r [Short and long term impacts have been clarified in the Final EIS (refer to Chapter 2, Section 2.5.1).

B25s [Comments noted.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

Page 3-63: Removal/Fill Permit and impacts to water resources:

B25t

There is no indication that there will be an evaluation of the negative impacts of the issuance of a fill/removal permit on the social economic and other public benefits if the permit is issued compared to the “no action” alternative.

La Grande has an ongoing history of flooding problems. The Union County Commissioners have been trying unsuccessfully for years to address this. The impacts of increasing the amount of runoff to this valley given the history of flooding impacts needs to be included in the EIS. In addition, because of the arid nature of the area, native habitat is as well as unirrigated farm lands are extremely dependent upon ground water to provide moisture for these areas.

B25u

Page 3-66
The EFSC does not evaluate the criteria necessary to issue a fill permit. They only require proof that the applicant has filed the appropriate paperwork to request the permit. The EIS needs to include this evaluation.

B25v

Page 3.65
Oregon Energy Facility Siting Counsel Information
This paragraph reflects the language of the administrative rules, but it is not how the process actually works. The EFSC only requires verification that an application was filed with DSL. They do not review the application for impacts and whether or not the application actually reflects the fact that there will not be damages as a result of the fill. Since the DSL is required to issue a permit once a site certificate is issued without further review, there is actually true evaluation of the consequences of the actions. The EIS does not reflect the actual procedures being followed. Because of this, the EIS

B25t

The issues raised concerning negative impacts of the issuance of a removal/fill permit on the social, economic and other public benefits of the proposed action vs. the no action alternative are beyond the scope of this analysis.

Potential impacts of the B2H Project on runoff and groundwater are addressed in Section 3.2.2.

B25u

Please refer to Sections 1.9.1 and 1.10, describes the timing and content of EFSC process. The EFSC process will be formally initiated once a route for construction is chosen and final engineering is completed. The Final EIS is not intended to analyze issues specific to criteria necessary to acquire removal/fill permits.

B25v

The Final EIS has been revised to discuss anticipated impacts of the proposed actions due to construction, operation and maintenance of the Proposed Action and includes an evaluation of which impacts would require a removal/fill permit. Final engineering of the B2H Project including access roads, laydown yards, tensioning sites, tower construction and associated structures has not been completed, and as such was not available for specific analysis with respect to removal/fill calculations. Please refer to Sections 1.9.1 and 1.10 where the timing and content of EFSC process is described. The EFSC process will be formally initiated once a route for construction is chosen and final engineering is completed. The Final EIS is not intended to analyze issues specific to criteria necessary to acquire removal/fill permits.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

B25v needs to include an evaluation of what the impacts will be of the proposed actions that would necessitate a removal/fill permit.

B25w Page 3-66:
Water Resources and Floodplains:
New roads or existing roads being improved outside the mile wide analysis area will create impacts exceeding the 50 foot area beginning at the center line of the roadway. The analysis area should be a minimum of 100 feet from the edge of the roadway. In steep terrain, even this distance may not be adequate to identify impacts. There is a need to identify what species are actually using these areas and how many species and numbers are impacted due to the importance of riparian areas to multiple wildlife species.

B25x Page 3-68
Wetlands and other water resources are surrounded by riparian areas that extend beyond the water sources. This area requires protection for a 100 foot area surrounding the wetland. A 50 foot analysis area from the center of a roadway will not identify critical wetland and water impacts. The use of "footprint" to calculate direct wetland impacts and acreage of impact does not result in a complete analysis. Permanent impacts on wetlands also occur due to wildlife avoidance, EMF impacts, transmission line ROW clearance, etc. There is an additional concern due to the significance of wetlands, their importance to wildlife and the fact that they are being destroyed at an alarming rate.

B25z Page 3-79 Table 3-25
This table shows permanent fill of wetlands as being a moderate impact. This action should be listed as a high intensity impact and tables should be updated to reflect that impact.

B25aa The EIS does not identify the riparian area surrounding wetlands and other water resource which is also a part of the critical resource area and the impacts to this sensitive habitat. The areas around wetlands

B25w Final engineering of the B2H Project including access roads has not been completed, and as such was not available for specific analysis with respect to roads and specific species in areas of proposed improvement or construction.
Wetlands and other water resources throughout the B2H Project area are contained within Riparian Conservation Areas, which extend 100 to 150 feet from the boundary of all mapped wetlands. Impacts on waters of the U.S. from tower construction, access roads, and associated structures have been assessed using a quantitative impact analysis.

B25x Wetlands and other water resources throughout the B2H Project area are contained within the Riparian Conservation Area vegetation community type. These Riparian Conservation Areas would accurately reflect any potential disturbance to areas within 100 feet of a wetland. Refer to Section 3.2.3 for the methods used to determine the extent and types of potential impacts to these Riparian Conservation Areas. The analysis of impacts to vegetation communities has been expanded to include potential impacts to these Riparian Conservation Areas, and can be found in Section 3.2.3. The analysis of impacts specific to wetlands and other water resources can be found in Section 3.2.2.

B25y The effects of the B2H Project on wetlands are discussed in Section 3.2.2.

B25z Comment noted. Impacts to wetlands by severity are defined by an Impact Criteria Table (Table 3-57), and are broken down by community type (i.e., forested wetlands, scrub-shrub wetlands, emergent wetlands). Wetlands and other water resources throughout the B2H Project area are mapped within a Riparian Conservation Area. Mapped Riparian Conservation Areas extend 100 to 150 feet from identified wetlands. Proposed impacts on these mapped Riparian Conservation Areas reflect any potential disturbance to areas within 100 feet of a wetland.

B25aa See next page for response to B25aa.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

B25aa are critical habitat for bats. I found no indication that surveys have been completed to identify bat migration routes, hibernation areas, etc.

B25ab Executive Order No. 11990 requires specific information in order to have a negative impact on wetlands on federal property including National Forests and BLM lands. This order requires in part, "each agency to the extent permitted by law, shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds (1) that there is no practicable alternative to such construction and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use in making this finding the head of the agency may take into account economic, environmental and other pertinent factors." Given the importance of wetlands, the EIS needs to include the information referenced in Sections 2 through 5 regarding any wetlands impacted in order to provide for a decision regarding the intent to damage this resource. (Attachment 4) Of particular concern in relation to this project are the requirements under Section 5 which states that each agency shall review the following factors: public health, safety and welfare, including water supply, quality, recharge and discharge, pollution, flood and storm hazards, and sediment and erosion; (The EIS does not include a complete review of recharge and discharge or sediment and erosion.)

B25ac The EIS does not appear to document impacts on native habitat and unirrigated crops due to impacts of the development or the other issues included in (b) and (c). The proposed development will also cause degradation of the Ladd Marsh Refuge and Mitigation Sites which results in the need for including these analysis specific to the Ladd Marsh area.

B25ad

B25ae Strict adherence to this process is necessary due to the fact that Oregon wetlands only cover about 2.2% of the state. Freshwater wetlands such as those impacted by this development support about

B25aa Comment noted. The Applicant has committed to surveys for sensitive species prior to construction. Final engineering of B2H Project roads, structures and associated crossings has not been completed, and as such was not available for detailed analysis in the Final EIS.

The wildlife analysis has been updated for the Final EIS to incorporate B2H Project-specific survey data, as well as survey data in the B2H Project area from state and federal wildlife agencies.

B25aa The cumulative effects analysis has also been updated to include additional information on existing sources of disturbance in the B2H Project area. In addition, it is reasonable to assume that construction of the B2H Project, by strengthening the transmission backbone in the region, will spur additional generation projects that are either in early stages of development or are not yet underway. Even if these projects are not yet individually known, their likely addition can be considered reasonably foreseeable and therefore should be included in the cumulative impacts analysis. With the potential for energy development in the region, BLM must recognize the connected and cumulative effects that these projects have upon one another and include that analysis in the Final EIS. This information is critical to development of an appropriate suite of mitigation efforts.

Recommendation: The Bureau should analyze the cumulative effects of reasonably foreseeable energy development that is likely to occur as a result of the proposed B2H Project.

B25ab Comment noted. Final engineering of B2H Project roads and associated structures, access and construction areas, has not been completed, and as such was not available for analysis in the Final EIS. Detailed analysis of impacts to waters of the U.S. was unable to be conducted during the Final EIS due to unavailable micro-siting information for tower pads, laydown yards, tensioning sites and other sub-facilities. Micro-siting occurs after preconstruction surveys are conducted to determine actual boundaries of regulated waters of the U.S. The Final EIS addresses information requirements as stipulated in Sections 2 through 5 of Executive Order 11990 throughout the document. Specific details regarding impacts to waters of the U.S. were unable to be conducted during the Final EIS.

B25ac Comment noted. As part of the B2H Project description, Idaho Power has committed to several mitigation measures reducing erosion. The Final EIS addresses acres of proposed impacts to mapped groundwater drinking water source areas and mapped surface drinking water source areas, reported as acres. Proposed impacts due to sediment and erosion impacts are addressed qualitatively.

B25ad The effects of the B2H Project on native vegetation are discussed in Section 3.2.3. The effects of the B2H Project on dryland farming are discussed in Section 3.2.7.

B25ae Analysis has been expanded to include alternative route variations with careful consideration of sensitive wildlife habitat and resources areas. The Final EIS has been revised to include evaluation of Ladd Marsh, see Sections 3.2.2 and 3.2.4 for further discussion.

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B25 Oregon Trail Trader (cont.)

B25af

one-third of the vertebrate wildlife species in the state. Wetland loss in Oregon between the 1780's and 1980's was 38%. In order to justify damages to wetlands, it is necessary to complete wildlife surveys at the locations. The likelihood of threatened and endangered species in these areas is significant and it needs to be determined what species could be impacted.

B25ag

Page 3-80, Table 3-26
 Identification of direct construction impacts in areas of Flood Plains and Drinking Water Source Areas does not address the true extent of impacts of the project on these water sources. The area analyzed need to include the blast areas and the impacts of runoff originating in the area of construction and operation. A financial value needs to be assigned to these impacts. In the grande ronde valley there is a history of problems with ground water. One of the reasons for the development of Ladd Marsh Wildlife Refuge was to address problems with ground water movement in the valley. The failure of ground water movement in the Grande Ronde Valley means that more water enters the valley in the form of runoff. This results in significant problems resulting in flooding, property damage and negative financial consequences. Drinking water can also be assigned a monetary value which should be identified in order to establish the costs of the impacts of this project.

B25ah

Disruptions in the movement of ground water damages vegetation which is dependent upon ground water during summer months and it increases the potential for wildfires. Springs in the area are also fed by ground water and in return feed wetlands.

B25ai

The EIS is also lacking detail to show that the proposed development will successfully prevent degradation of the waters on the Project site. There is a lack of baseline information on the receiving streams, and there is no monitoring of the receiving waters during construction to ensure there are no significant damages. I encourage you to include the Grande Ronde River/Catherine Creek

B25af

Comment noted. The Applicant has committed to conducting preconstruction surveys to be conducted to identify environmental resources in the B2H Project Area, including wetlands, waters and sensitive wildlife habitat, to establish baseline conditions. The Applicant has committed to several Design Measures and site specific Selective Mitigation Measures designed to avoid or reduce anticipated B2H Project effects to environmental resources, including the creation and implementation of a Water Resources Protection Plan and Reclamation, Revegetation, and Monitoring Framework Plan. These mitigation measures have been considered as a requirement for construction, operation, and maintenance and will be transferred to the Plan of Development which will be a condition of the Record of Decision and a stipulation of the right-of-way grant.

See response to Comment B25ab.

B25ag

Comment noted. Final engineering of B2H Project structures, access roads and construction areas and related proposed blasting zones, has not been completed, and as such is not available for analysis in the Final EIS. The Final EIS addresses proposed impacts to mapped areas of groundwater drinking water source areas and mapped flood hazard areas on a conservative basis using a quantitative impact analysis. Proposed impacts due to sediment and erosion impacts are addressed qualitatively. The issues raised concerning economic loss include an expanded analysis of economic impacts of project under Final EIS Sections 3.2.7 and 3.2.17.

B25ah

The effects of the B2H Project on wetlands are discussed in Section 3.2.2.

B25ai

Comment noted. Preconstruction surveys will be conducted to identify wetland and water resources in the B2H Project Area and establish baseline conditions. In addition, the Applicant has committed to several design measures and site specific selective mitigation measures designed to avoid or reduce anticipated B2H Project effects to waters of the U.S., including the creation and implementation of a Water Resources Protection Plan and Reclamation, Revegetation, and Monitoring Framework Plan. These mitigation measures have been considered as a requirement for construction, operation, and maintenance and will be transferred to the Plan of Development which will be a condition of the Record of decision and a stipulation of the right-of-way grant.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

B25ai Watershed Assessment Plan information to establish a baseline for evaluation to require mitigation should negative impacts occur due to the development. (Attachment 5) The Wind Energy Siting Handbook (attachment 6) lists issues which apply to transmission line construction as well as wind farm development that can cause problems and require a greater degree of monitoring and mitigation than would normally occur. Oregon’s Integrated Water Resources Strategy (Attachment 7, Page 8) specifically lists the concern regarding the effects on water from energy development projects and policies.

B25aj Page 3-82 Vegetation Removal
Removal of vegetation cover required by this project combined with factors such as soil compaction, the amount of water being used and slopes mean there is a high probability of water impacts.

B25ak Page 3-84
Roads will have an ongoing impact on water resources. Stormwater runoff from roads will cause long-term erosion impacts and deposit soil moved from the roadway into the waterways of the area.

B25al Page 3-86
Blasting impacts may result in reduction in groundwater quality. In any area where blasting is to occur, the impacts will significantly exceed the depth of the foundation structure. The normal movement of groundwater will be impacted. This may result in opening up areas of pollution into areas of higher water quality, impacts to the restoration of ground water due to impeded flows, etc.

B25am Page 3-86
Construction Water:
The following statement in the EIS is incorrect: “No new water rights would be required.” The applicant is required to obtain from the

B25aj The potential effects of vegetation removal on water resources are discussed in Section 3.2.2.4.
In addition, the Applicant has committed to several design features and site specific selective mitigation measures designed to avoid or reduce anticipated B2H Project effects to water resources, including the creation and implementation of a Water Resources Protection Plan and Reclamation, Revegetation, and Monitoring Framework Plan. These mitigation measures have been considered as a requirement for construction, operation, and maintenance and will be transferred to the Plan of Development which will be a condition of the Record of decision and a stipulation of the right-of-way grant.

B25ak The potential effects of roads on water resources are discussed in Section 3.2.2.4. Also, see response to Comment B25ak.

B25al The potential effects of blasting on water resources are discussed in Section 3.2.2.4. Also, see response to Comment B25ak

B25am The Applicant has committed to using currently existing municipal sources of water for construction purposes. No new water rights or water wells will be required to construction, operate or maintain the B2H Project.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

B25an Page 3-88, Table 3-30
Scrub-Shrub and Forested Wetlands cannot be included as short-term impacts. These areas will take over 3 years to be restored.

B25ao Page 3-94
Section 303(d) Listed Streams
Sediment-impaired streams will be impacted over the entire duration of the project due to increased erosion resulting from ground disturbance. Erosion will occur over an extensive area surrounding the project and channels created will continue to provide increased sedimentation. Reforestation efforts will be challenging due to soil types, steep inclines, high altitudes resulting in slow plant growth, lack of moisture and increased invasive weeds just to name a few issues.

B25ap Habitat restoration activities need to be surveyed on an ongoing basis to remove invasive species prior to them going to seed until the impacted area has been restored and treated. The survey areas need to extend beyond the ROW where invasive species are likely to have dispersed seeds. The EIS needs to include dispersal areas for invasive species in the area as this constitutes a portion of the area of impact of the proposed transmission line.

B25aq Page 3-96
Construction Water Requirements
The quantity of water required for this construction project does not support a finding that impacts will be low and short-term. It also does not support the finding that there will be no adverse effects on existing water rights. When taken in combination with the impacts of blasting, increased runoff, reduced movement of water into the groundwater system, make it likely that there will be impacts the EIS does not, but needs to include minus compelling evidence to the contrary. There will be additional water use during habitat restoration due to the challenges with establishing habitat in this dry climate. The EIS should be augmented with information regarding

B25ar 13

B25an Short and long term impacts have been clarified in the Final EIS (refer to Chapter 2, Section 2.5.1).

B25ao The potential effects of the B2H Project on Section 303(d) listed sediment-impaired streams are discussed in Section 3.2.2.4.
In addition, the Applicant has committed to several measures designed to mitigate B2H Project effects from noxious weeds, among them the creation of a Noxious Weed Management Plan and Reclamation, Revegetation, and Monitoring Framework Plan, which will be included in the Plan of Development. These plans detail methods for soil conservation, re-seeding, and preconstruction noxious weed surveys to identify noxious weed extents in the right-of-way. The Plan of Development would be a condition of the Record of Decision and a stipulation of the right-of-way grant.

B25ap The Applicant has committed to several measures designed to mitigate effects from noxious weeds, among them the creation of a Noxious Weed Management Plan and a Reclamation, Revegetation, and Monitoring Plan, which will be included in the Plan of Development. These plans detail the methods used to conduct preconstruction weed surveys, areas requiring ongoing weed control activities both before and after B2H Project construction, and post-construction weed monitoring.

The analysis of noxious weeds in the EIS has been revised to greater clarify the threat from noxious weed invasion, and the potential effects of the B2H Project on facilitating the spread of noxious weeds.

B25aq The Applicant has committed to using currently existing municipal sources of water for construction purposes. No new water rights or water wells will be required to construction, operate or maintain the B2H Project.

B25ar Response pending. Will be addressed when agency comments on the AFEIS are addressed.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

B25ar

the habitat mitigation area required for the Elkhorn Wind Farm as the developers were surprised at the difficulty they had in managing the mitigation area and they had problems with meeting deadlines for habitat restoration and enhancement.

B25as

Table 3.32 Acres of Long-term Impacts on Wetlands
Defining long-term impacts to Forested Wetlands as moderate impacts defies all reason. In addition, considering only the footprint of the development as long-term impacts flies in the face of all the information thus far included in the EIS, I suggest a review of impacts is in order and then an updating of this table to reflect reality. There are multiple impacts that occur in the area surrounding a high voltage power line.

B25at

Long-term impacts to wetlands include: EMF impacts to wildlife, removal of forested habitat, increased water temperature, erosion on and off site, introduction and distribution of invasive plants, habitat fragmentation, UV light impacts on wildlife, slowing of water table restoration, damage to wells and ground water loss of wetlands on public and private land and displacement of birds and other wildlife utilizing the area. Wildlife deaths will occur from contact with the power lines as well as being displaced to poorer quality habitat.

Page 3-97
Mitigation Planning

B25au

Acceptance of a "low probability" finding needs to be supported by objective findings which are not present in the EIS. If this finding is going to be accepted, there needs to be documentation that it is justified. Pre and post development surveys of water resources as determined by well depth, quality and output, output of springs in the area, and identification of any changes in TMD's for listed water in the area of impact need to be required. If impacts are documented, there needs to be a mitigation plan developed to address those impacts.

B25as

The impact analysis for water resources has been revised for the Final EIS. Levels of residual impacts reflect the anticipated impacts remaining after consideration of the design features and mitigation measures that would reduce impacts on water resources. The Applicant has committed to several measures designed to mitigate B2H Project effects from impacts to waters of the U.S., among them the creation of a Water Resources Protection Plan and Reclamation, Revegetation, and Monitoring Framework Plan. These plans detail methods for avoidance, spanning, selective vegetation management and preconstruction wetland surveys to identify wetland and waters extents in the right-of-way. Long term impacts would be mitigated by the use of these methods and the mitigation for all wetlands permanently impacted. These mitigation measures have been considered as a requirement for construction, operation, and maintenance and will be transferred to the Plan of Development which will be a condition of the Record of Decision and a stipulation of the right-of-way grant.

B25at

Comments noted.

B25au

Comment noted. The Final EIS has been revised to include evidence to support "low probability" findings statement, including reference to mapped, known baseline conditions, mitigation measures including preconstruction surveys to verify baseline conditions and design features and selective mitigation measures to be applied.

COMMENT(S)

RESPONSE(S)

B25	Oregon Trail Trader (cont.)
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B25av { Page 3-98
The wetland mitigation plan appears to only address the direct construction impacts. Mitigation needs to include impacts due to the factors listed in on Page 3-96 comments.

B25aw { Page 3-104
Issues for analysis
What impact will the B2H project have on timber production in Oregon? How much timber producing land will be lost due to requirements to keep the ROW cleared of trees? What is the economic impact of this for the projected life of the transmission line corridor? What is the potential impact on payments to counties due to reduced timber land available for harvest?
What methods and timeframes will be required to track revegetation efforts and identify and control introduction of noxious weeds in and adjacent to the ROW?

B25ax { Page 3-106
Impacts to wetlands and surface waters are expected to be less than 3 acres overall. This statement is only accurate for the footprint of the proposed development. It fails to address indirect impacts to water resources and wildlife which also constitute environmental impacts of the proposed line. How large an area will be disturbed by construction activity and how long will it take to restore it to pre-construction condition? Can it be restored to pre-construction condition? Activities that require movement of equipment and labor through the riparian area need to be included and mitigated for. These areas as well as areas along the entire length of this development will have a significant loss of value for wildlife, farming, recreation, lumber production and all other uses. These represent an economic loss and a value needs to be assigned to these losses in order to determine if the need which is questionable justifies the costs of this proposed transmission line. In the area where this

B25av { Comment noted. Indirect impacts to waters of US have been addressed in the Final EIS in a qualitative discussion, including an expanded discussion about the Applicant's committed Design Features and Mitigation Measures that are applicable to reducing impacts to wetlands and surface waters. Compensatory mitigation specific to individual wetland impacts is outside the scope of this analysis.

B25aw { The Final EIS has been updated to include evaluation of existing timberlands and analysis of potential impacts. See Section 3.2.6 for further detail. In addition, impact analysis and mitigation measures have been more clearly identified and organized to address impact and mitigation associated with revegetation. See also Section 3.2.17 for discussion of economic impacts related to Timber resources.

B25ax { Comment noted. Indirect impacts to water resources have been addressed in the Final EIS in a qualitative discussion, including an expanded discussion about the Applicant's commitment to the use of design features and mitigation measures that would be applicable to reducing impacts to wetlands and surface waters. The issues raised concerning economic loss include an expanded analysis of economic impacts of project under Final EIS Section 3.2.7 and 3.2.17.

The economic analysis in Section 3.2.17 has been revised based on updated based on additional land use data discussed in the revised version of Sections 3.2.6 through 3.2.11. The economic analysis discusses potential impacts on timber resources and how these effects may affect local economic conditions.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

transmission line crosses public land, it is inconsistent with multiple use of public lands as it precludes other uses.

Analysis Area:

Page 3-121

Many of the resources identified in Table 3-37 are of cultural and economic value to most Eastern Oregon residents. Gathering of berries and mushrooms are common activities representing cultural and economic value for generations of people living in Eastern Oregon. The EIS fails to indicate the extent of impacts negatively impacting these resources or recognize the importance and extent of culture and values of the local community that are impacted.

B25ay

Page 3-206

Bird and Bat Issues needing additional analysis

1. Setbacks need to be provided from nest sites consistent with USFW recommendations to avoid impacts to bald and golden eagles, raptors and migratory birds nesting in area of proposed high voltage line. This is necessary to be consistent with Executive Order 13186.
2. According to ODFW, most studies and guidelines (Pagel et al 2010, Kochert et al, 2002) suggest limiting disturbance during critical periods such as courting as nesting. Because of this, maintenance and construction activities should not occur between January 1 and July 15. The window of timing is based on documented periods of golden eagle courtship and nesting in the intermountain west region (Beebe 1974. Kochert et al.2002, Watson and Whalen 2003).
3. Review of the studies and baseline information gathered for the previously planned Antelope Ridge Wind Development and the previously constructed Elkhorn Wind Farm should be incorporated in the EIS as they contain a significant amount of material that is relevant to this EIS due to the location adjacent to the proposed transmission line. Bird fatality information from Elkhorn and other wind developments within 6 miles of the proposed transmission line

B25az

B25ba

B25bb

B25ay [Comment noted. More thorough discussions of traditional foods resources have been added to Sections 3.2.3, 3.2.4, 3.2.5, and 3.2.13 of the Final EIS.

B25az [Comment noted. Spatial restrictions around nests have been determined in collaboration the cooperating agencies, including the U.S. Fish and Wildlife Service.

B25ba [Comment noted. Idaho Power has committed to seasonal and spatial restrictions on B2H Project activities during critical periods for wildlife.

B25bb [See response to Comment B25b

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

need to be included in the EIS and that information used to predict fatalities based upon birds typically impacted by high voltage power lines. ((Attachment 9) provides information regarding golden eagle patterns of flight in adjacent areas. This information should be used to establish setbacks form nests within 6 miles of transmission line.

4. What are the projected impacts to habitat quantity as well as quality in the areas adjacent to the proposed power line? EFSC has been requiring mitigation of only habitat impacts resulting from the footprint of developments and ignoring the reduction in quality of habitat as is required by ODFW rules. In order to be in compliance with Executive Order 13186 it is reasonable to believe that the damages to the quality of habitat must be identified as required in ODFW rules. Studies need to be included documenting deer and elk response/avoidance of transmission lines and associated impacts including roads. Documentation should include ODFW information regarding where the displaced wildlife would move to as this could mean there will be population level impacts. If animals move into farm land ODFW may have to make a downward adjustment in population goals. Also, if they move into areas which already are at recommended population levels or to lower quality habitat, this could result in starvation. The Union County Land Use Plan under OAR 345.0022 requires mitigation in favor of goal five resources in this big game and critical wildlife habitat.

5. The EIS needs to identify what the cumulative impacts will be on Golden Eagles, migratory birds and bats in combination with the developed and proposed wind farms and other developments in the state and how the addition of this transmission line will add to those impacts.. This issue needs to include information being compiled by ODFW regarding population level declines of Golden Eagles in Oregon.

6. The Energy Facility Siting Counsel has been allowing an “acceptable level” of migratory bird deaths as a result of energy developments. Since this practice is resulting in significant losses of protected birds, the EIS needs to include a scientifically defensible level of bird and bat deaths to assure the project will not result in unsustainable

B25bc

B25bd

B25be

B25bc

B25bd

B25be

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

The cumulative effects analysis on the Wildlife section (Section 3.3) has been updated for the Final EIS to include additional information on impacts from the B2H Project and existing sources of disturbance.

See response to Comment B25b.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

B25be

reductions in wildlife. This needs to be documented by basing figures on current and projected future fatalities from other sources.

B25bf

7. Given the high number of sensitive bird and bat species and development occurring near water and in coniferous habitats there need to be breeding bird and bird displacement surveys. This is a significant issue since the area has been identified as having extensive use by migratory birds and bats and the need to assure wildlife moving into and out of Ladd Marsh are not negatively impacted by the high voltage line.

B25bf

See response to Comment B25ab.

B25bg

3-208

Analysis Area

The analysis area of ½ mile on either side of the transmission line is not adequate to identify wildlife habitat and impacts of the proposed line. It minimalizes the importance of the Ladd Marsh Wildlife Refuge and Mitigation Sites. The proposed line is in proximity to this important wildlife area and serves as a barrier for wildlife moving into and out of the marsh on an ongoing basis. The indirect impacts to this area and the wildlife utilizing it are significant, and fail to comply with the requirements for protection of the area by local, state and federal agencies and organizations. No EIS for the location of this proposed transmission line can be considered complete absent an analysis of impacts to this area.

B25bg

Potential effects on the B2H Project on wildlife species in Ladd Marsh has been added to the Segment 2 discussions of Sections 3.2.4.5 and 3.2.4.6.

B25bh

IMPACTS TO LADD MARSH AND LADD MARSH FEDERAL MITIGATION SITES NEED A COMPLETE IMPACT ANALYSIS:

Ladd Marsh Wildlife Refuge is listed as a protected area and included in the Register of National Heritage Resources, as well as being an important bird resource. The Union County Land Use Rules and Management Plan for this area provide for protection of animals and scenic resources. Three parcels of land in the area are also permanently protected by virtue of being compensation for wildlife damages resulting from dams on the Columbia River. Bonneville Power makes annual payments to the Oregon Department of Fish and Wildlife who has responsibility for assuring no damages occur to these sites. The power line will disrupt the movement of

B25bh

Analysis has been expanded to include alternative route variations with careful consideration of sensitive wildlife habitat and resources areas. The Final EIS has been revised to include evaluation of Ladd Marsh, see Sections 3.2.2 and 3.2.4 for further discussion.

See response to Comment B25bg.

The Applicant has committed to design features and site-specific mitigation measures to minimize anticipated B2H Project impacts to birds, big game, and other wildlife, including preconstruction surveys, seasonal and spatial restrictions, a Plan of Development that includes a Biological Resources Conservation Plan, limited removal of trees and other vegetation, and limited new or improved accessibility to sensitive habitat.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

B25bh

elk, deer, antelope into and out of the marsh. In addition, there are bird flyways into and out of the Ladd Marsh area which may cross the ROW. This proposed transmission line is in an area used for nesting, feeding and resting areas which are necessary for the continued use of the Ladd Marsh Area by all manner of wildlife. Fragmentation of the surrounding habitat will displace birds and other wildlife in their movements into and out of the marsh as well as providing multiple opportunities for birds in particular to be killed.

B25bi

A portion of Ladd Marsh is also a mitigation site for the Department of Transportation. The EIS needs to include a determination of whether or not the proposed transmission line is in compliance with the Interagency Agreement between ODFW and the Department of Transportation NO, 21,390 ODFW Agreement NO: 001-4079C. (Attachment 5)

B25bj

Ladd Marsh is also an important tourist and educational resource, provide opportunities for hunting, hiking and other activities which contribute significantly to the local economy.

B25bk

A high voltage power line is not consistent with the farming and forest patterns currently present around the proposed transmission line. Multiple waterways in the area of the transmission line have have previously been identified as compromised and adding to the problem runs contrary to the time and money that has gone into stream improvement projects and Ladd Marsh and Ladd Creek. The EIS needs to include and analyze the impacts to these sites.

B25bl

There are multiple plans and projects which rely upon protection of this area and the wildlife utilizing the area, some of which are attached:

Attachment 11: IProject ID 20512- Grande Ronde River Basin Umbrella;
Attachment 12: Project ID 20114 – Securing Wildlife Mitigation Sites— Oregon, Ladd Marsh WMA Additions

Attachment 13: Preoject ID 20002100: Securing Wildlife Mirtigation Sites – Oregon, Ladd Marsh Wildlife Area Additions

B25bi

Siting of the proposed transmission line would be in compliance with applicable federal, state, and local land use regulations and guidance.

B25bj

Comment noted. The impacts on the relevant and important values and management of the Ladd Marsh Wildlife Area are disclosed in the Final EIS (refer to the Segment 2 discussion of Specially Designated Areas in Section 3.3.6). Direct and indirect impacts on the Ladd Marsh Wildlife Area are assessed.

B25bk

Route preference noted. Impacts to the Ladd Marsh Wildlife Area have been expanded in the Final EIS and are included in Section 3.2.6.

B25bl

Thank you for the references.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

B25bm Attachment 14: Five Year Habitat Management Plan—Attached as it lists species present at the location which should also be listed in your list of species present.

B25bm Attachment 15: Executive Summary of 10 year plan for Ladd Marsh. This attachment includes fish species known to inhabit Ladd Creek and its tributaries within the LMWA. Species present in this area can also be assumed to exist in tributaries going into the area and should be consistent with the EIS lists,

B25bn The Oregon Department of Fish and Wildlife receives annual payments from Bonneville Power to provide protection of the federal mitigation sites within the Ladd Marsh area. No actions taken by or approved by the state or federal government can negatively impact the mitigation sites. There can be no actions which damage these including impacts on the views. The Northwest Power and Conservation Act and the Columbia River Basin Fish and Wildlife Program have been determined by the courts to place the importance of fish and wildlife as equal to development actions. These documents outline requirements that override the state authority when it comes to impacts on mitigation sites. The EIS does not identify the mitigation sites as significant, has not addressed how the proposed facility will impact the fish, birds, and other wildlife which are present on the site and move into and out of the area to use the mitigation site habitat, nor does it address protected views. The EIS needs to include a review and analysis of impacts on views, wildlife, recreation, educational opportunities, economic and social impacts of the proposed transmission line. Actions which results in negative impacts can be challenged in federal court.

B25bo

B25bp Page 3-271
Table 3-63
Removal or disturbance to nesting sites for migratory birds and raptors needs to be included under high intensity impacts. This represents a

20

B25bm The list of federally listed and special status species that occur in the B2H Project area has been updated for the Final EIS.

B25bn Comment noted. The Applicant has committed to updated design features and selective mitigation measures designed to minimize anticipated potential B2H Project impacts from new access roads and sediment transport to streams from upland locations. B2H Project design features and selective mitigation measures that would minimize impacts on fish resources include spanning of riparian communities and water courses, using existing access roads, and selective removal of vegetation. Refer to Section 3.2.5 of the Final EIS for analysis of impacts.
See response to Comment B25bh.
The wildlife analysis has been updated for the Final EIS to include additional information on direct and indirect effects from the B2H Project including information on wildlife that inhabits Ladd Marsh in the B2H Project area.

B25bo Comment noted. Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project, Chapter 3 has been expanded to provide more description of the methods used for analyzing effects associated with each resource (tiered to the overall approach) and to provide more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.

B25bp The criteria for impact levels has been updated for the Final EIS in collaboration with the cooperation agencies, and the analysis for migratory birds and raptors was revised based on comments in the Draft EIS.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

B25bp

violation of federal law and should not be minimized by categorizing it as other than a high impact.

Mortality of special status wildlife species is a federal law violation and needs to be addressed as a high intensity impact.

Disruption of breeding and foraging behavior for migratory birds and raptors impacts federally protected species and even on a temporary basis should be rated as “moderate” intensity.

B25bq

Page 3-274

Visual impacts resulting in displacement of wildlife needs further evaluation. Current research indicates that many animals are sensitive to and avoid ultraviolet light. The impact of this coming off high voltage transmission lines is a long-term impact that will displace animals for the life of the project.

B25br

The impact of EMF on the birds and wildlife breeding and nesting in the area of the transmission line as well as impacts to farm animals and humans needs evaluation and identification of the area of impact.

(Attachment 16: Review of high voltage Power lines and birds)

This transmission line is proposed to go through areas of protected migratory birds, bats, bald and golden eagles and impacts to site utilization and reproduction need to be addressed in the EIS. “Effects of High-Voltage Power on Birds Breeding within the Power Lines Electromagnetic Fields,” Paul F. Doherty, Jr. and Thomas C. Grubb, Jr. is another study addressing this issue.

(Attachment 17: Deer and Elk impacts)

(Attachment 18: EMF and cows)

This study shows that dairy cattle in areas subjected to electromagnetic fields are having physical and behavioral changes.

B25bq

Comment noted. Displacement of wildlife is considered in the effects analysis. However, displacement of wildlife from ultraviolet light was not raised as an issue during public and agency scoping, and the effects of such are not documented in literature.

B25br

Electric and magnetic fields have been extensively studied as a possible risk factor for adverse health effects in humans. Similar to the human health studies, no mechanism has been demonstrated between the exposure of an animal to transmission line levels of electric and magnetic fields and a disease outcome. See Section 3.2.18.2 for further detail.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

B25bs Pacemakers and implantable cardiovascular defibrillators can be subject to interference by EMF.
It is not the responsibility of a homeowner or their guests to mitigate the impacts of EMF resulting from the development of a high voltage power line by moving out of their home or telling their friends that they need a doctor's clearance to visit. The developer has the responsibility for assuring adequate setbacks are provided to assure pacemakers and defibrillators continue to function.

B25bt Radio controlled equipment and telecommunication instruments can be impacted by high voltage power lines. This can create a safety issue when individuals are working or traveling alone. It can also interfere with farming practices. This issue needs to be explored along with the other EMF concerns more thoroughly in the EIS.

(Attachment 20: Executive summary of the California EMF Risk Evaluation for Policy Makers and the Public)

B25bu NIOSH will not confirm or deny that there is no association between childhood cancer and magnetic fields. The International Agency for Research on Cancer (IARC) which is a part of the World Health Organization (WHO) and also the National Institute of Environmental Health Science (NIEHS) have both stated in their most recent documents that EMFs are a possible human carcinogen. A review of their findings shows that this statement is based upon the potential of childhood leukemia from exposure to EMF's. The recommendation is that exposure be less than 3 mg, A setback from high voltage lines of 500 ft. should provide this level of protection. If a developer is choosing to expose children to magnetic fields above this level and the PSC is going to approve that exposure, both entities are assuming responsibility for negative health impacts to children. Courts have awarded damages to individuals who have had health impacts not resulting from other causes who have been exposed to magnetic fields. Setbacks from houses and businesses need to be adequate to assure there will be no negative impacts. The currently proposed transmission line is not providing setbacks from residences that will result in no magnetic field

B25bs Idaho Power's transmission lines are designed and operated to minimize EMF exposure wherever practicable in accordance with recommendations made by the World Health Organization, the Institute of Electrical and Electronics Engineers, and other. Many sources of EMF, at a variety of frequencies, have been reported to affect pacemakers. The manufacturers of pacemakers also have designed their devices in various ways to minimize potential interference from endogenous sources (e.g., muscle potentials) and interference by conducted currents from exogenous sources.

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

B25bt The effects on the B2H Project on agriculture, including interference with farming equipment or practices are addressed in the Section 3.2.7. See also the response to Comment B25br.

B25bu This section has been revised for clarity. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP), for guidance and guidelines regarding EMF. EMF is discussed in greater detail in Section 3.2.18. As identified in design features of the Proposed Action (Table 2-7), the Applicant would continue to address public health and safety throughout the life of the B2H Project.

COMMENT(S)

RESPONSE(S)

B25	Oregon Trail Trader (cont.)
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B25bu [impacts to people living along the ROW. The referenced material is easily accessible and should be included in the EIS.

Page 3-276

Deer and Rocky Mountain Elk:

B25bv [The project as proposed does not avoid impacts to wildlife habitat classified as Category I and Category II by ODFW Habitat Mitigation Rules. In fact, the proposed transmission line is planned to be constructed directly through an elk calving area that has been identified by ODFW as one of the most important calving areas in the United States. This area is on private land. The ROW needs to avoid this area and be placed outside the area of indirect impacts rather than running right through this important elk calving area as is currently planned.

B25bv [The wildlife analysis has been updated for the Final EIS in cooperation with ODFW. The Applicant has committed to design features and site-specific mitigation measure to minimize anticipated B2H Project impacts on elk, including seasonal and spatial restrictions, a Plan of Development that includes a Biological Resources Conservation Plan, and limiting new and improved accessibility to sensitive areas.

B25bw [The EIS fails to identify areas designated as Big Game Critical Wildlife Habitat, Big Game Winter Range and the area designated as a Zone of Multiple Biological Values. The EIS needs to identify by acres the direct and indirect impacts to these important wildlife areas and asses the impacts of the proposed transmission line. These are all Category 2 wildlife areas and are supposed to be avoided.

B25bw [The big game analysis has been revised for the Final EIS to include additional information on direct and indirect effects of the B2H Project on designated big game habitats; the designated habitats to analyze were identified in collaboration with the state wildlife agencies.

B25bx [Impacts to elk habitat in the area surrounding the Grande Ronde Valley result in displacement of elk into the floor of the valley. This results in overgrazing of the habitat on Ladd Marsh, elk impacting crops, destroying fences and causing damages which the ODFW is required to address. When impacts occur, ODFW must reduce population goals. This impacts the number of hunting tags which are issued, reduces the money available for wildlife management and significantly impacts the local economy due to it's reliance on hunters, wildlife viewers, and recreational users who come to the area due to wildlife related activities. These impacts are going to be costly and measurable.

B25bx [See response to Comment B25bv.

COMMENT(S)

RESPONSE(S)

B25	Oregon Trail Trader (cont.)	
B25by	<p>elk displacement and shares results from a WEST study completed in the area. The information in the letter should be included in the EIS and an analysis made regarding issues and impacts which also occur during development and use of high voltage power lines such as road development and habitat fragmentation.</p>	<p>B25by [The analysis of elk has been updated for the Final EIS to include additional information on the direct and indirect impacts from the B2H Project.</p>
B25bz	<p>Page 3-287 Table 3-67 This table showing the percent of habitat disturbed with the ROW is meaningless. The area disturbed by the footprint in no way reflects the habitat impacts. Tables need to be updated to reflect the acres of habitat impacted by animal displacement, avoidance, EMF's, and changes to the native plant species.</p>	<p>B25bz [The analysis has been revised for the Final EIS to include a quantitative analysis of the estimated acres of disturbance to designated big game habitats due to the construction of B2H Project features. Additional direct and indirect effects on big game are analyzed qualitatively.</p>
B25ca	<p>IMPACTS TO WATER AND FISH</p> <p>1. Please include information regarding compliance with "20512, Grande Ronde River Basin Umbrella" and the agreement No. 20114 "Securing Wildlife Mitigation Sites – Oregon, Ladd Marsh Wma Additions"</p>	<p>B25ca [Potential effects of the B2H Project on fish in the Grande Ronde River Basin are described in Section 3.2.5. The B2H Project would not cross fish-bearing waterways or mapped wetlands on the Ladd Marsh Wildlife Area. Refer to Section 3.2.2 for a description of potential effects of the B2H Project on wetlands in the Grande Ronde River Basin.</p>
B25cb	<p>Page XIX:</p> <p>An evaluation of the no action alternative needs to seriously consider whether or not this line is needed. Investment in conservation is the most effective means of addressing reduced impacts of electric use impacts on the environment. Individual electricity users practicing conservation and the regulations requiring more energy efficient appliances and structures means it is unlikely the future electricity needs justify this development. Heating and water heaters represent at roughly 50% of the electricity used. Changes in these will make immediate and significant long-term reductions in energy use. The existing transmission lines are more than adequate, and were constructed to address future increases in electricity consumption by the residents of the state. These previous projections have since been shown to vastly overstate the actual increase in demand. Projections for the need to move wind generated electricity are questionable. There is a definite shift in the public's willingness to pay for wind energy or the</p>	<p>B25cb [See response to Comment B25k.</p>

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

transmission capacity needed to move it. In fact, of the 29 states with RES requirements, 22 have had bills introduced to change, reduce or eliminate those standards.

B25cb Ratepayers will benefit the most by relying upon energy conservation and locally produced renewable energy, not having to pay for the proposed transmission line, and not having the economic, environmental and health impacts of the high voltage power line. The need for the transmission line needs to be based on the needs, benefits and costs to ratepayers, not the benefits to the bottom line for utilities and out of state energy producers.

B25cc The value of the forested areas to wildlife is significant and the variety of wildlife and plant species present in this area make the damages to resources substantial. On the public land being impacted by the transmission line, the EIS needs to address the fact that this is Public Land that is designated as “multiple-use”. The transmission line will remove from other uses the area of the line and extend to the width of the negative impacts on humans and wildlife. This effectively removes the entire area from current or future use by any other users. The costs of the impacts in terms of wildlife, other users, extended impacts on views need to be defined and a value assigned to those costs to the public. The US Forest Service, BLM and government agencies are charged with protection of the public’s interest in these resources. Since they do not have “ownership”: of the land, the public needs to be informed of the costs of removing the land from future uses such as timber production, recreation and wildlife habitat. In the private land impacted, the EIS does not address the actual costs to crop producers in the state. Impacts include erosion, invasive weed spread, an inability to control pests, fires and weeds with aircraft in areas near the power line, etc. The actual area of land removed from productive use by the transmission line can represent a large percentage of the total crop land available to an individual farmer. It far exceeds the “footprint” of the power poles which the developer references.

B25cd

B25ce The removal of trees along the waterways will increase the water temperature which also negatively impacts aquatic life. Another consideration in the forested areas is the fact that once a ROW is cleared of

B25cf

B25cc [Comments noted.

B25cd [Analysis has been expanded to include alternative route variations with careful consideration of effects to public and private lands. The impact on land use and public interest are carefully considered along with the BLM’s charge of providing multiple use of the lands they administer. The Final EIS has been updated to include impact analysis for recreation, timber production and wildlife habitat.

B25ce [Most agricultural operations can continue within the right-of-way. Long-term surface disturbance and construction disturbance are included in Section 3.2.7. This includes estimated structure disturbance, but other B2H Project facilities such as access roads, stations, pulling and tensioning sites, etc. The analysis to agriculture for all alternatives in the Final EIS includes a discussion of impacts to soils, crop production, irrigated agriculture, aerial spraying, etc. Refer to Section 3.2.7 (Types of Potential Effects) for this discussion.

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

B25cf [The Applicant has committed to updated design features and selective mitigation measures designed to minimize anticipated potential B2H Project impacts. B2H Project design features and selective mitigation measures that would minimize impacts on fish resources include spanning of riparian communities and water courses, using existing access roads, and selective removal of vegetation. Refer to Section 3.2.5 of the Final EIS for analysis of impacts.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

B25cg [trees, the remaining trees do not have root systems able to withstand the winter wind, rain and snow build up. Multiple trees along the edges of the cleared paths are likely to fall. The loss of timber will exceed the actual dimensions of the ROW. Removal and damage of the native ground cover in this area will result in increased flooding. Trees and other vegetation slow the movement of water and allow more of it to be absorbed into the ground. Removal of this ground cover means that the water will not be absorbed into the groundwater system as efficiently resulting in more runoff and more flooding in this area which already experiences periodic flooding.

B25ch [Projected electricity usage was overstated by the applicant. Data supports the fact that electricity usage is continuing to decrease as opposed to increasing. Locally generated electricity does not need to go through the transmission lines. This proposed line is not intended to meet the needs of Oregon. It has been proven that the more wind energy that is introduced into the transmission lines, the harder it is to maintain system reliability. Oregon electricity users are not as a group requiring more wind energy. The current energy mix and amount of energy available is meeting the need of residents currently and according to future projections, will continue to meet their needs for the foreseeable future. This is the case so long as the infrastructure in Oregon is not required to meet the needs of the wind developers and utilities to transport additional wind generated electricity through Oregon to other states. The EIS in total simply does not support the requirements of 192.491 requiring the showing that this development is necessary to meet the reasonable needs of the public for an adequate supply of electricity.

B25ci [The applicant can state a lot of things, and this EIS quotes them as doing so throughout, however, that does not make the statements accurate. Applicant statements are not adequate to base any evaluation of actual impacts, costs or benefits absent reliable documentation that supports the truthfulness of those statements. It is patently false that the development of this line will reduce the cost of energy for the residents of Oregon. For example, the requirement for users to pay for the transmission line, though hidden, must be included in the cost of the energy being used. When users

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B25cg [Indirect impacts to water resources have been addressed in the Final EIS in a qualitative discussion, including an expanded discussion about the Applicant's commitment to the use of design features and mitigation measures that would be applicable to reducing impacts to wetlands and surface waters. The issues raised concerning economic loss include an expanded analysis of economic impacts of project under Final EIS Sections 3.2.2 and 3.2.17.

B25ch [See response to Comment B25k.

B25ci [It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized by the Public Utilities Commission. The responsibility of BLM and other land-management agencies is to respond the application for right-of-way across lands it administers. The most readily available information was used during development of the Draft EIS.

COMMENT(S)

RESPONSE(S)

B25 **Oregon Trail Trader (cont.)**

B25ci

through conservation and efficiency reduce the need for energy, it takes less renewables to meet a given standard. Installing renewable energy generation at the meter is the most effective method for meeting the goals of renewable energy, reducing emissions and helping the local economy.

B25cj

Economic impacts cannot be analyzed absent inclusion of all economic impacts including the costs to the tourism industry, local economy, reduction in farm income and high value farm land, values of impacted wildlife and natural resources of the area, costs of impacts to water quality, aquatic life, etc. The modeling process and assumptions used are biased and address only issues intended to determine the financial benefits to the utilities in development of the transmission line. A financial analysis which focuses on the limited number of factors and ignoring the costs to a large portion of those impacted is not meaningful and should be disregarded in determining a need and impacts of this project.

B25ck

Impacts to archaeological and historic resources need to be evaluated in terms of the importance of visual impacts upon the value of the resource. Often the value of a site relates to it's association with the surrounding area and a loss of visual congruence can significantly impact the value of the site. For instance, in the case of a burial ground or early wagon trail, the visual character of the area, not just the avoidance of planting a power pole on the suite needs to be considered.

B25cl

The EIS does not appear to be consistent with Executive Order 13186 Responsibilities of Federal Agencies to Protect Migratory Birds. The developers have not completed a survey of the proposed line locations necessary to evaluate wildlife impacts. It also fails to reflect current information regarding the impacts of high voltage power lines on birds and bats. The EIS should include species covered under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act to the list of environmentally sensitive resources to avoid potentially significant impacts to birds which may be otherwise categorically excluded. (See US Fish and Wildlife Service, 2008, Birds of Conservation Concern, 2008, United States Department of Interior, Fish and Wildlife Service, Division of Migratory Bird Management, Arlington, VA <http://fws.gov/migratorybirds>)

B25cj

The economic analysis in Section 3.2.17 has been updated based on additional surface disturbance data for the alternative routes. The revised analysis assesses how surface disturbances may affect natural resources and the livelihoods of local residents.

B25ck

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

B25cl

See responses to Comments B25b and B25ab.

COMMENT(S)

RESPONSE(S)

B25

Oregon Trail Trader (cont.)

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Installing renewable energy generation at the meter is the most effective method for meeting the goals of renewable energy, reducing emissions and helping the local economy.

Economic impacts cannot be analyzed absent inclusion of all economic impacts including the costs to the tourism industry, local economy, reduction in farm income and high value farm land, values of impacted wildlife and natural resources of the area, costs of impacts to water quality, aquatic life, etc. The modeling process and assumptions used are biased and address only issues intended to determine the financial benefits to the utilities in development of the transmission line. A financial analysis which focuses on the limited number of factors and ignoring the costs to a large portion of those impacted is not meaningful and should be disregarded in determining a need and impacts of this project. For example, if you only consider wildlife viewing, hunting and fishing which will be impacted by this transmission line, you are looking at a significant value to local communities which will be impacted. See Attachment 20 ^{and 21} which lists some of the financial benefits coming from these activities. While I do not have the figures before me on the financial benefits of the Ladd Marsh area, they are easily accessible and they are significant.

Our sporting goods store serves a large percentage of customers who are purchasing hunting rifles and supplies, handguns to carry when individuals are picking berries or gathering wood, ammunition, clothing and camping supplies, fishing supplies, and keepsakes from their trip to the area. Many businesses along the route of the transmission line rely upon the health of the wildlife, views and other resources that will be negatively impacted by the proposed transmission line.

Impacts to archaeological and historic resources need to be evaluated in terms of the importance of visual impacts upon the value of the resource. Often the value of a site relates to its association with the surrounding area and a loss of visual congruence can significantly impact the value of the site. For instance, in the case of a burial ground or early wagon trail, the visual character of the area, not just the avoidance of planting a power pole on the site needs to be considered.

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COMMENT(S)

RESPONSE(S)

B25

Oregon Trail Trader (cont.)

~~252~~

The EIS does not appear to be consistent with Executive Order 13186 Responsibilities of Federal Agencies to Protect Migratory Birds. The developers have not completed a survey of the proposed line locations necessary to evaluate wildlife numbers and impacts. It also fails to reflect current information regarding the impacts of high voltage power lines on birds and bats. The EIS should include species covered under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act to the list of environmentally sensitive resources to avoid potentially significant impacts to birds which may be otherwise categorically excluded. (See US Fish and Wildlife Service, 2008, Birds of Conservation Concern, 2008, United States Department of Interior, Fish and Wildlife Service, Division of Migratory Bird Management, Arlington, VA <http://fws.gov/migratorybirds>)

As indicated in this section, the potential wildlife impacts are multiple and can be significant. Appropriate siting of the transmission line cannot occur absent wildlife surveys of the proposed transmission route. The EIS reflects minimal efforts to survey wildlife along proposed routes. This information is necessary to determine actual cumulative impacts of the proposed line and whether or not those impacts are so significant in combination with other impacts to make it necessary to deny the application. The forests and water resources of the area contain multiple and varied wildlife resources which need to be surveyed so that any approval contains appropriate requirements and mitigation to protect those animals. A review of the ODFW submission Exhibit 8 which was compiled for the proposed Antelope Ridge Wind development just on the other side of I-84 provides a wealth of information regarding wildlife in the area, potential impacts of development in the area, mitigation needs, etc. This information should be included in the EIS as it represents several years of activity and compilation of material.

Research and reports compiled by or paid for by groups such as electric companies with a financial investment in the outcomes should be carefully reviewed to assure the analysis is consistent with the data. In the case of Antelope Ridge, a study by WEST understated the significance of the avoidance of the wind development by elk and deer as it was later analyzed by ODFW biologists.

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B25cm

B25cn

B25cm [See response to Comment B25ab.

B25cn [See response to Comment B25ci.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

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B25co I suggest you incorporate the report by Kurt Cl Kielisch, ASA, IFAS, SR/WA, R/W-AC compiled for the Appraisal Group One entitled "Valuation Guidelines for Properties with Electric Transmission Lines". This paper includes information on items impacting property value, review of literature, and several examples of studies and information specifically on property values. It identifies the voltage of the overhead lines creating the impacts and shows that the greater the capacity of the transmission lines, the greater the impact on property values. The paper also includes information specific to farm land. This information shows a substantial impact on property values and provides current information.

B25cp High voltage transmission lines remove a significant amount of any small farm or residential property from uses that were available prior to the transmission line being built. If you apply the recommendations of the World Health Organization regarding limiting the exposure to EMF to under 3mg it means that structure should not be built within 500 ft. of the center of the ROW. A swath of 500 feet across a farmer's high value or irrigated farm land makes use of that land and sighting of new farm structures very challenging and will severely limit the value of the land to future purchasers if they are aware of the recommendation.

B25cq Additional Resources used in addition to those attached include the documents referenced in the ODFW reports and "Towers, turbines, power lines, and buildings—steps being taken by the U.S. Fish and Wildlife Service to avoid or minimize tqke of migratory birds at these structures" Albert M. Manville, II

B25cr The golden eagle population in Oregon is being impacted at a population level. The cumulative impacts of environmental changes to their habitat in the state are not being addressed. The EIS needs to include a cumulative evaluation of current and projected future impacts due to increased wind and other developments and including the additional impacts that will occur as a result of this proposed development including the fact that the addition of a high voltage power line will stimulate the development of additional wind farms along the corridor.

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B25co [] Comment noted.

B25cp [] Comment noted.

B25cq [] Thank you for the references.

B25cr [] Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment, including cumulative effects.

Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. New wind projects were added while some wind energy projects addressed in the Draft EIS may no longer be included in this analysis due to changing economic conditions and expiration of permits during the revision period between the Draft and Final EIS. See Section 3.3 for further detail.

See response to Comment B25bd.

COMMENT(S)

RESPONSE(S)

B25 Oregon Trail Trader (cont.)

3-82

B25cs

Economic impacts must be addressed for this transmission line consistent with Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Eastern Oregon is an economically disadvantaged area where many areas have a large percentage of people living below the poverty level. The EIS fails to include the economic costs to towns, businesses and individuals along the proposed route as a result of the combined value of timber, farmland, tourists and wildlife along the proposed routes. There needs to be a complete review of the economic impacts of this line to the communities and individuals along the transmission line in terms of both costs and benefits.

B25ct

The Environmental Impact Statement needs to be based upon documented impacts rather than the unsupported and inaccurate opinions of the developers.

B25cu

This 500kV line is not needed based upon the projected drop in electricity usage. The current system was designed for and is more than adequate to meet the consumer needs in Oregon, and those needs are decreasing.

B25cv

The distribution of wind generated electricity through the state does not benefit the residents of the State of Oregon, and increasing the percentage of wind energy on the transmission lines will increase the difficulty with maintaining system reliability. Idaho Power provides electricity to a very few Oregon residents. The reason Bonneville Power is needing to participate in this line is because Oregon does not allow consideration of whether or not there is a need for wind generated electricity to develop a wind farm in Oregon. This means there is a glut of wind generated electricity in the state and Bonneville Power is being required to replace cheap reliable dam generated electricity with wind energy which requires a much larger transmission line. Oregon ratepayers will now be required to pay for this line through increased electric costs being charged by BPA to recover the costs of this construction. Oregon residents should not have to assume the costs to send wholesale energy to another state.

B25cw

The EIS fails to provide a complete assessment of the environmental damages that the proposed transmission line will create due to a failure to

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B25cs

The environmental justice analysis in Section 3.2.17 has been updated to further discuss how transmission lines may affect underserved and at-risk populations. Economic impacts of surface disturbances associated with the construction and operations of the B2H transmission line are discussed in Section 3.2.17.6.

B25ct

The National Environmental Policy Act does not require an Environment Impact Statement to include formal cost-benefit analysis; economic, social, and environmental impacts must be disclosed, but these impacts are not required to be discussed in monetary terms.

See response to Comment B25ci. Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project, Chapter 3 has been expanded to provide more description of the methods used for analyzing effects associated with each resource (tiered to the overall approach) and to provide more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.

B25cu

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

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

B25cv

It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized and approved as appropriate by the Public Utilities Commission in each state. The BLM's purpose and need is to respond to the application for right-of-way across lands it administers.

B25cw

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

COMMENT(S)

RESPONSE(S)

B25

Oregon Trail Trader (cont.)



B25cw do an environmental assessment of much of the proposed route. There has been limited effort given to identify threatened and endangered species, migration corridors being used by birds and bats or the location of bat hibernation or maternity locations. Since several bat species are now being considered or nearing consideration as threatened or endangered species, a conservative and thorough evaluation of the potential for population level impacts is required. Given the impacts of white nose syndrome, all impacts must be addressed cumulatively.

B25cx The EIS indicates that impacts to streams and wetlands will only occur when the project actually crosses those areas. This is not accurate. Impacts of erosion and changes in groundwater flow plays a significant role in streams and an even more significant role in the maintenance of wetlands. The EIS does not contain reliable information indicating there will not be widespread and unsustainable impacts to these areas which are critical to multiple wildlife and plant life species.

Road base calculations need to incorporate slope and intermittent drainage.

B25cy According to Jim Cadwell ODFW in La Grande, there are approximately 400 head of elk that reside on Craig Mountain and move in and out of Ladd Marsh. Impacts of the power line on this population needs to be analyzed.

Need to assess impact on ZMBV *(Exhibit 22)*

ODFW considers displacement of big game a direct impact. (Letter to Arlo Corwin, July 1, 2010)

B25cz Need biological supporting evidence supporting setbacks from raptor nests and provisions for adaptive management if the approved setbacks result in raptor impacts.

B25da Need to reference a set of BMP's for road and culvert maintenance activities.

B25db Remove the phrase "when practical" or other fudge words that usually refer to an economic decision.

B25cx Comment noted. Final engineering of B2H Project roads has not been completed, and as such was not available for analysis in the Final EIS. Impacts on wetlands and waters have been expanded in the Final EIS to specifically include effects from tower construction, access roads, and associated structures. Impacts from project actions and the methods used to estimate surface disturbance of project actions is included in Section 3.2.2.

B25cy See response to Comment B25by.

B25cz See response to Comment B25az. Adaptive management practices will be addressed in the revised Plan of Development.

B25da The access road types and potential crossings are included in Chapter two of the document. Maintenance activities are also discussed in Chapter 2.

B25db Comment noted.

COMMENT(S)

RESPONSE(S)

B25

Oregon Trail Trader (cont.)

B25dc

~~3#B2~~

ODFW recommends activity restrictions in big game winter range from Dec. 1 through April 30. This should be reflected in the EIS along with recommendations for setbacks and mitigation actions from the Oregon Department of Fish and Wildlife and the US Fish and Wildlife Service.

Thank you for providing the opportunity for me to provide input on this proposal. I am a very active user of the public lands and both physical and wildlife resources available in this state. Please protect them from unnecessary development such as this transmission line.

Sincerely,

Irene Gilbert/2310 Adams Ave./La Grande, Oregon 97850

Phone: 541-963-8160 e-mail: ott.irene@frontier.com

B25dc

The Applicant has committed to complying with the seasonal and spatial restrictions developed in cooperation with the Oregon Department of Fish and Wildlife and the US Fish and Wildlife Service. Refer to Table 2-13.

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