

# **APPENDIX F PUBLIC COMMENT LETTERS AND RESPONSES**

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**Table F1-1 Response to Substantive Comments Received on Draft EIS**

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Gearheart, Haynes & Sylvia	1-A	"Would you please send us a copy of the supporting document/s outlining all of the reasons for the "Agency" preferring Alternative Route "D" for the Pacific Power line right of Way."	The rationale for the selection of the Agency Preferred Alternative identified in the DEIS is detailed in Section 2.8 of the document. This information is included in Section 2.4.2.2 of the FEIS.
Gearheart, Haynes & Sylvia	1-B	"Would you also provide us with the name and address for the Project Manager supervising this project for Pacific Power Company?"	For the most current information regarding the Pacific Power's Project Manager, please contact Pacific Power at 1-877-620-7678
Gearheart, Haynes & Sylvia	2-A	"The alternative "D" favored by the BLM people appears to be totally opposed to direct and efficient power line constructions and operations, especially when considering all the rights-of-way needed to implement the actual construction and including the roads that may be required according to the EIS information on the disc we received."	All of the Action Alternatives presented in the DEIS would satisfy the purpose and need of the proposed Project. The Action Alternatives vary in length and right-of-way requirements, and construction and operation activities are well within the Pacific Power's implementation standards. This information is included in Section 2.4 of the FEIS.
Maples, William	3-A	"The "preferred line route" will impact our use of grazing, use of our corrals and pens, passage to creek water for cattle, and ability to use the private property as necessary to conduct our business."	Grazing impacts are discussed in Section 4.4.4 of the DEIS. Structures placed by Pacific Power on private property and public grazing lands will be coordinated with the landowner and/or agencies to minimize potential impacts to grazing operations, and grazing may still occur within the transmission line ROW corridor. Structures would be placed as to not impede the movement of cattle or access to corrals and pens by spanning these areas to the extent possible. This information is also included in Section 4.4.4 of the FEIS.
Maples, William	3-B	"We feel bordering the YTC lessens impact on business."	Comment noted. The preference for Alternative B has been noted.
Maples, William	3-C	"Furthermore, we have sections for home sites that will be adversely affected by the line through our sections."	Thank you for informing the BLM, Cooperating Agencies and Pacific Power regarding the potential future use of your property. Impacts to residential parcels are detailed in Section 4.4.4 of the FEIS.
Maples, William	3-D	"Additionally, why isn't the existing fire break along the YTC already protects the Sage-Grouse."	The fire break along JBLM YTC does not protect or limit access of adjacent land by Sage-Grouse. Existing fire breaks on JBLM YTC protect Sage-Grouse by reducing the spread of habitat-altering wildfires, but they do not obviate the need for additional protections for Sage-Grouse. Additional information regarding Sage-Grouse is included in Section 4.3.3.4 and Appendix B-5 of the FEIS.
Nopp, Cliff & Gail	4-A	"Concerned about: Economical effect on property values"	The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Nopp, Cliff & Gail	4-B	"Health problems from nearby 230 kV power line (Elect. Magnetic field)"	Potential electromagnetic effects of the proposed Project is covered in Section 4.16.1.1 of the DEIS and Section 4.16.2 of the FEIS.
Nopp, Cliff & Gail	4-C	"Need much better maps on what happens along Sage Trail Road (the EIS did not define this area at all)."	Detailed mapping of the entire proposed Project for all Action Alternatives for inclusion in the EIS is not required and is not practical. Detailed mapping was, however, provided in agricultural areas (see Appendix A) to show these regionally significant resources relative to the preliminary (non-design level) transmission line route segments of the Action Alternatives. Detailed maps were also provided during open houses conducted during the scoping and EIS public review periods. The existing conditions are described in detail under Route Segment 1a/NNR-1 for each resource section.
Nopp, Cliff & Gail	4-D	"How close will the line come to our house at 690 Sage Trail Road?"	As described in Section 2.2 of the SDEIS, Route Segment 1a presented in the DEIS was modified to accommodate a single affected landowner on the route segment's west end (becoming NNR-1). After the publication of the SDEIS, a landowner meeting was held by Pacific Power for affected landowners located on Sage Trail Road (see Section 5.3.4) to provide a forum for landowners to communicate concerns and discuss the design, construction, and maintenance of the Project. During the meeting, additional modifications to Route Segment 1a/NNR-1 were proposed by the affected landowners. As a result, the western-most portion of Route Segment 1a/NNR-1 was modified to avoid Sage Trail Road and routed to the south of the residences fronting Sage Trail Road along an approximately 0.75-mile long section located directly east of the Pomona Substation. This modification has been incorporated into the analysis of all Action Alternatives presented in this FEIS.
Risenmay, Ray	5-A	"This forum showed that the participating agencies place more emphasis on protecting sage hens and cultural sites that could be protected from damage than the lives of farmers who have their livelihood and their personal safety put at risk by the placing of this (3C) route."	The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. The Agency Preferred Alternative is chosen based on the consideration of all relevant resources, agency policies, and other factors. The comparison of alternatives is presented in Section 2.7 of the DEIS and 2.6 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Risenmay, Ray	5-B	"Wherever power poles are placed in a farm unit, it will impact the circle irrigation system causing the farmer to have unnecessary alterations to his farm."	Typically, transmission line structures can be placed as to avoid the circle irrigation systems. During the engineering and design phase of this Project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on center-pivot irrigation systems is covered in Section 4.4 of the DEIS and Section 4.4.4 of the FEIS.
Risenmay, Ray	5-C	"If you are truly serious about not causing unnecessary impact, why don't you listen to the people that will be impacted instead of a bunch of sage hens and buried cultural sites."	Comment noted. The BLM, Cooperating Agencies, and Pacific Power are carefully considering all public comments on the proposed Project.
Gallacci, Jeff	6-A	"On the preferred Route 3c the line of towers will impose dramatically on the private airstrip of Bob Christensen, as well as the homes of Justin Christensen and Jefferson."	The EIS has been modified to include an impacts analysis on the air strip; please see Sections 3.4.2.9 and 4.4.4.10 of the FEIS.
Gallacci, Jeff	6-B	"Properties along the route between RD 24 SW and RD 29 SW where aerial crop dusting have been the customary method of applying product for agriculture will be no longer be candidates for effective crop dusting."	The BLM has carefully considered the effects of the proposed Project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.
Gallacci, Jeff	6-C	"My opinion is that the RR right of way along the river would impact the argi-economic environment not at all."	Comment noted. The BLM and the Cooperating Agencies have carefully considered the environmental trade-offs among the Action Alternatives, and a comparison of alternatives in presented in Section 2.7 of the DEIS and Section 2.6 of the FEIS.
Balmelli, Joe	7-A	"Are you saying cultural resources is more important than the safety and well being of many people affected by your preferred route. The resources can be protected as they did on my property with the waytoma line. You have to realize the hardship these farmers face with these obstacles in their fields."	Comment noted. The BLM and the Cooperating Agencies have carefully considered the environmental trade-offs among the Action Alternatives, and a comparison of alternatives in presented in Section 2.7 of the DEIS and Section 2.6 of the FEIS. Impacts on agricultural operations are summarized in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.
Hull, Phil	8-A	"On the map in the EIS ("Agriculture & Irrigation, Page 5 of 5") the wine grape vineyard is incorrectly labeled as a blueberry field."	Appendix A has been revised to show the correct crop type. This updated information is included on the "Agriculture & Irrigation" map provided in Appendix A of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Hull, Phil	8-B	"Any transmission line spanning the vineyard would need to accommodate the operation of harvesting machinery, which is 14 feet tall. Also, the transmission line would need to span the width of the vineyard so that the placement of a new tower would not require the removal of grape plants."	The size, configuration and location of the area referred to will allow spanning of the vineyard to avoid removal of any crop and avoid conflicts with harvesting machinery. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts to agricultural areas, including vineyards, are addressed in Section 4.4.4 of the FEIS.
Yorgensen, Jerry	9-A	"The shortest and most logical path would be to follow the existing Pomona-Wanapum 230kV line."	A route alternative following Pacific Power's existing Pomona-Wanapum 230kV transmission line is detailed in the SDEIS as the New Northern Route (NNR) Alternative. This alternative was added to the range of alternatives considered. Please see Chapter 2 of the SDEIS for a description of this route alternative. This information is included in Section 2.4 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.
Yorgensen, Jerry	9-B	"The most logical of preferred routes would be 3b. This is shorter and has less impact on numerous property owners."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Alton, Larry & Zongqi	12-A	"Another concern we have about this power line near our property is the health damage to residents on our property from the radiation emitted from this power line."	The electro-magnetic effects of the Proposed Project are covered in in Section 4.16.1.1 of the DEIS and Section 4.16.2 of the FEIS.
Warren, Guy	14-A	"It seemed to most of us there that if a new 230kV line is needed for the Yakima area (no benefit to Grant Co.) then the obvious, shortest route is following the existing Pomona-Wanapum line through the Army Range."	A route alternative following Pacific Power's existing Pomona-Wanapum 230kV transmission line is detailed in the Supplemental Draft EIS (SDEIS) as the New Northern Route (NNR) Alternative. This alternative was added to the range of alternatives considered. Please see Chapter 2 of the SDEIS for a description of this route alternative. This information is included in Section 2.4 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.
Burk, Douglas	17-A	"It is clear that landowners do not and Grant County does not receive any benefit from placement of this transmission line on Wahluke Slope."	As described in Section 2.6.1 of the DEIS, Vantage Substation is integral to the proposed Project, and the system reinforcements would serve the entire Yakima Valley. Interconnection to the Vantage Substation would require the crossing of Grant County. The range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Logston, Gary	18-A	"The concern is how this affects access to the property and Sage Trail Rd, including future use and maintenance of said road."	The structures would be placed along Sage Trail Road approximately where the existing distribution poles are currently located. Typically, structures can be placed as to avoid impacting parcel access, and Pacific Power will work with each land owner to minimize impacts on property access and road maintenance activities. The placement of new structures generally along the same alignment and the offset distance from the Sage Trail Road would avoid road maintenance impacts. Additional road and transportation-related impacts of the Proposed Project area detailed in Section 4.7.3 of the DEIS and Sections 4.7.3 and 4.7.4 of the FEIS.
Logston, Gary	18-B	"and the obscuring of the view"	The potential for view obstruction and mitigation measures to be implemented to minimize view impacts are detailed in Section 4.8.5.1 of the DEIS and Sections 4.8.5 and 4.8.6 of the FEIS. During the engineering and design phase of this proposed Project, Pacific Power will work with agencies and private land owners to spot structures, design the structure locations and route to minimize impacts to resources through micro-siting.
Logston, Gary	18-C	"Another deep concern is the drop in value of the property"	The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.
Gearheart, Haynes & Sylvia	19-A	"Your selection has caused us great concern since it affects our two farm units - #'s 74 and 66 in Block 253, Columbia Basin Irrigation Project. We want to know why you would want to cause the greatest negative impact on the people and their farm operations in some of the most productive and valuable farm land in the State of Washington."	The BLM and the Cooperating Agencies have considered impacts on irrigated farmland, including those units referred to in the comment. Typically, structures can be placed as to avoid the irrigation systems. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on irrigated agriculture is covered in Section 4.4.4.10 of the DEIS and Section 4.4.4 of the FEIS.
Gearheart, Lynn	20-A	"This transmission line would seriously affect a considerable group of farm units. It could cause costly replacements of current irrigation systems. It would seriously affect the value of the property because of increased production costs as well as actual loss of productive ground due to the placement of towers and the huge right-of-way."	The BLM and Cooperating Agencies have considered impacts on irrigated farmland, including those units referred to in the comment. Typically, structures can be placed as to avoid the irrigation systems. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on irrigated agriculture is covered in Section 4.4.4.10 of the DEIS and Section 4.4.4 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Gearheart, Lynn	20-B	"Consider the danger to aerial applicator applying chemicals essential to maintaining crop production in this area."	The BLM has carefully considered the effects of the proposed Project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.
Guderian, Tom	21-A	"2. The Mattawa farmland route will damage present and future economic values in an area that has exceptional potential because of land quality, water and climate (growing season). 3a. Power transmission lines devalue all property near them, both the land and building sites. A home would be extremely devalued, perhaps given no value by a prospective purchaser."	Comment noted. The effects of the proposed Project on property values are covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.
Guderian, Tom	21-B	"Any disruption of an irrigation circle devalues its economic value and desirability to farm operators. Notwithstanding today's promise by administrators of the right of ways for operation and maintenance, stricter rules can be applied in the future that will hinder farming operations."	Typically, structures can be placed as to avoid the circle irrigation systems. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on center-pivot irrigation systems is covered in Section 4.4 of the DEIS and Section 4.4.4 of the FEIS. The effects of the proposed Project on property values are covered in Section 4.9.8 and Section 4.9.8 of the FEIS.  It is Pacific Power's responsibility to acquire easements from private property owners to safely and efficiently operate, maintain and access power lines. Many of the restrictions and terms of any easement are detailed on the title policies or are known to all parties prior to easement acquisition. As the comment noted, these terms are subject to change with the goal of safely operating and maintaining the line subject to the easement, although this is unlikely.
Guderian, Tom	21-C	"The danger from transmission lines to crop dusters is real. Compliance with FAA regulations sounds good, but is not adequate to protect the lives of pilots who fly with varying loads and conditions to meet required farming schedules. The repetitive nature of flying a field contributes to the risk."	The BLM and the Cooperating Agencies have carefully considered the effects of the proposed Project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Guderian, Tom	21-D	"The Mattawa farm route is likely to be three times the cost considering a doubling of the line and right of way and devaluation costs. Have all avenues in arriving at a route with the US Army been exhausted?"	A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.
Diefenbach, Robert	22-A	"You need approximately 125 feet of right of way which will require me to shorten my irrigation circle the same amount. Who would pay for the cost of reducing my circle?"	Typically, structures can be placed as to avoid the circle irrigation systems, and Pacific Power is responsible to work with each land owner to minimize impacts on these facilities. Pacific Power will purchase easements through negotiations with the private landowners and according to the appraised value of the rights acquired pays the private landowner in one lump sum. The certified appraiser will develop an opinion of value using standard appraisal practices, including careful analysis of any available market data and comparable sales, and by taking into consideration the rights being acquired from the private landowner. The private landowners will be invited to accompany the appraiser during property inspection. The private landowners can then identify any property features and uses believed to be of importance in determining the value of the easement.
Diefenbach, Robert	22-B	"By reducing my circle, I will lose about 23.7 acres of production. A circle next to me is renting for \$550 per acre. This translates to a minimum of \$13,000 in income should I rent my property out. Raising a crop would translate into more of a loss of income to me. Does this mean you would compensate me \$13,000 a year for this right of way? Also this loss in income would have to be adjusted over time for inflation."	Typically, structures can be placed as to avoid the circle irrigation systems, and Pacific Power is responsible to work with each land owner to minimize impacts on these facilities. Pacific Power will purchase easements through negotiations with the private landowners and according to the appraised value of the rights acquired pays the private landowner in one lump sum. The certified appraiser will develop an opinion of value using standard appraisal practices, including careful analysis of any available market data and comparable sales, and by taking into consideration the rights being acquired from the private landowner. The private landowners will be invited to accompany the appraiser during property inspection. The private landowners can then identify any property features and uses believed to be of importance in determining the value of the easement.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Gibbs, Robert	23-A	"I am writing you in support of the Agency Preferred Route as presented at the meeting in Selah, WA on 2-05-13."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Christensen, Neil	24-A	"There are already 4 major power transmission lines running through the Wahluke Slope farmland area. Yet another line would mar the landscape and raises serious safety issues for agricultural spray pilots of both airplanes and helicopters."	The BLM and the Cooperating Agencies have carefully considered the effects of the proposed Project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.
Christensen, Neil	24-B	"The power line would pass just 0.4 miles East of the approach end of our family runway along road 26 S.W. For the last several years we have been waiting for the right financial opportunity to lengthen the runway to allow larger airplanes to land on it. One member of our family already owns an airplane too large to land on the runway, so it is just a matter of time before we make the move to lengthen it to accommodate larger planes. This power line would restrict our freedom to develop our business intentions for the future, part of which includes lengthening our runway."	The Final EIS has been updated to include discussion of the runway and your family's proposed expansion (Section 3.4.2.9 of the FEIS). During the engineering and design phase of this proposed Project, Pacific Power will work with agencies and private land owners to spot structures, design the structure locations and route to minimize impacts to resources through micro-siting.
Christensen, Neil	24-C	"I know there are those who say the Black Rock Reservoir project will never happen, but just this week Governor Jay Inslee called for legislation to enact the Department of Ecology to find solutions to the Yakima River's over-allocated water supply. The Black Rock Dam and Reservoir is not dead yet, and many still say it is the most viable answer to the situation. To place a power line through that area would mean further waste in the future if it has to be moved to make way for the reservoir."	Black Rock Reservoir was evaluated by the Bureau of Reclamation in the Yakima River Basin Water Storage Feasibility Report Final Planning Report/Environmental Impact Statement. The study concluded that planning and construction of the reservoir would be too costly to implement, and will not be pursued as an option for addressing Yakima Valley water issues. Bureau of Reclamation is a formal Cooperating Agency for the proposed Vantage to Pomona Heights 230 kV Transmission Line Project and has participated in the environmental review of this proposed Project.
Christensen, Neil	24-D	"The danger for agricultural spray pilots alone should cause major concern for this route. We have agricultural airplane pilots fly the very area of the proposed route on a daily basis nearly all summer long. More than one helicopter pilot has been killed hovering over cherry orchards following rainstorms at harvest time in the Wenatchee area in the last few years as a result of hitting power lines. More acres of cherries are being planted in the Mattawa area and more will be planted in the future. A private plane crashed in Sunnyside this past week because it hit powerlines. A number of years ago a small plane carrying biologists hit power lines crossing the Columbia River south of Mattawa and crashed in the very area this line would cross the river. All pilots in the Mattawa area are truly concerned."	The BLM and the Cooperating Agencies have carefully considered the effects of the proposed Project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Christensen, Neil	24-E	"The new line would run less than 100 feet from at least 8 residences, one of which is my son's home. It would also run just 0.4 miles off of the approach end of our family's runway which has been in continuous use for 38 years."	During the engineering and design phase of this proposed Project, Pacific Power will work with agencies and private land owners to spot structures, design the structure locations and route to minimize impacts to resources through micro-siting.
Kelley Family	25-A	"There is no clear way of knowing were the proposed Power Line from Pamona Hts. To Sage Trail, as the roads on the proposed line map are not clearly defined."	It is unclear as to which parcel or property the comment is referring to. Detailed maps were provided during open houses conducted during the scoping and EIS public review periods.
Kelley Family	25-B	"We would like to know if there will be any compensation for the un-usable land."	Land "usability" is dependent on the type of current or proposed land use considered. The amount of permanently occupied land by transmission line structures that prohibits any other use is very small, and many land use activities can continue to occur with the right-of-way. Impacts to land use and associated mitigation measures are included in Sections 4.4.4 and 4.4.5 of the FEIS, respectively.
Roy, Mark	26-A	"We own properties in the Zone 1 West area, bordering the SW corner of the Firing Center. We are in favor of the 1b route (rather than the 1c) that goes thru the Firing Center rather than thru our properties."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Roy, Mark	26-B	"We are concerned about the economic impact that the line causes in our farming activities and also the devaluation of the property for future developments that will someday include housing."	The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS Section 4.9.8 of the FEIS.
Roy, Mark	26-C	"There is also concern for the electro magnetic influence for existing homes and for their families that have been built in that area."	Potential electromagnetic effects of the proposed Project are covered in Section 4.16.1.1 of the DEIS and Section 4.16.2 of the FEIS.
Roy, Mark	26-D	"We will be limited on what farming and development activities if the proposed routes goes thru our properties"	The proposed Project would affect current and future land use, depending on the proposed use. The effects of the proposed Project on current and future land use are addressed in Section 4.4 of the FEIS.
Roy, Mark	26- E	"Not to mention the visible impact that the transmission will cause on the quality of life for those that live in the area."	Comment noted. Visual impacts are detailed in Section 4.8 of the DEIS and Section 4.8 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Roy, Mark	26-F	"Would it not be less of an environmental impact if your proposed route follows the inside boundary of the Firing Center along that Zone 2 South the entire route? The Firing Center has existing roads and fire breaks maintained that could be the road access for the new transmission line. There is concern about the Sage Grouse and its habitat and since there is this existing road already in the Firing Center, it would make the most sense to use the existing route rather than scar up the land and take up valuable farm land and Sage habitat for your easements."	The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. The Agency Preferred Alternative is chosen based on the consideration of all relevant resources, agency policies, and other factors. The comparison of alternatives is presented in Section 2.7 of the DEIS and Section 2.6 of the FEIS.
Larson, Kene	27-A	"The construction may result in restricted access to his driveway and residence."	Typically, structures can be placed as to avoid driveways and other property access points, and Pacific Power will work with each land owner to minimize impacts on these facilities.
Larson, Kene	27-B	"The power lines are aesthetically unappealing"	Comment noted. Visual impacts are detailed in Section 4.8 of the DEIS and Section 4.8 of the FEIS.
Larson, Kene	27-C	"and will severely decrease the value of his property."	The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.
Larson, Kene	27-D	"The power lines are a danger to the health of the humans and animals residing on the property."	Comment noted. Public Health and Safety is covered under Section 4-16 of the DEIS and Section 4-16 of the FEIS.
Larson, Kene	27-E	"None of these concerns are addressed in the Draft Environmental Impact Statement. The DEIS is over one thousand (1,000) pages, touching on everything from cultural and native American concerns to socioeconomic and environmental justice. However, nowhere in the document does the Agency discuss the impact and interference with individual landowners whose properties will be upended by the power line construction. The present proposal for the power lines would be an absolute upheaval of Mr. Diefenbach's living situation."	A comprehensive assessment of impacts to specific landowners is not required and is not possible given the scale of the proposed Project. As required by the Council of Environmental Quality Regulations, the FEIS is a comprehensive environmental study that addresses potential impacts to the human, as well as the natural environment. Although it is unclear as to what impacts to individual landowners the commenter is referring to, impacts on land use, recreation, visual resources, and socio-economics all potentially affect the human environment and, therefore, individual landowners. Impacts to those resources are addressed in Sections 4-4, 4-5, 4-8, and 4-9 of the FEIS, respectively.
Larson, Kene	27-F	"There are alternatives to the Agency's preferred route. There is an option that follows the river bed that completely bypasses individual property owners. Mr. Diefenbach encourages the Agency to choose this alternative or some other route that avoids his residence."	Comment noted. Alternatives B, C, E, and G parallel the west side of the Columbia River and are analyzed in detail in the DEIS. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Gearheart, Scott	28-A	"The proposed line cuts through prime farmland (My family owns land in the area) which will negatively impact the productivity of the land. It would disrupt irrigation systems, decrease actual productive ground (due to tower placements and rights of way) and create logistical issues with ground transportation"	<p>Typically, structures can be placed as to avoid the circle irrigation systems. During the engineering and design phase of this Project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on center-pivot irrigation systems is covered in Section 4.4 of the DEIS and Section 4.4.4 of the FEIS. The effects of the proposed Project on property values are covered in Section 4.9.8 of both the DEIS and FEIS.</p> <p>It is Pacific Power responsibility to acquire easements from private property owners to safely and efficiently operate, maintain and access power lines. Many of the restrictions and terms of any easement are detailed on the title policies or are known to all parties prior to easement acquisition. As the comment noted, these terms are subject to change with the goal of safely operating and maintaining the line subject to the easement, although this is unlikely.</p>
Gearheart, Scott	28-B	"and aerial application of chemicals needed for nearby crops."	The BLM and the Cooperating Agencies have carefully considered the effects of the proposed Project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4 of the FEIS.
Plath, Cliff	29-A	"The power lines present a hazard to operators of farm equipment engaged in normal activities. Center pivot irrigation systems in the area require periodic maintenance that would put repair crews at risk should the line be built."	Typically, structures can be placed as to avoid the circle irrigation systems. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on center-pivot irrigation systems is covered in Section 4.4 of the DEIS and Section 4.4 of the FEIS.
Plath, Cliff	29-B	"The route that crosses the Yakima Training Center is a more logical alternative and should be used."	A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Christensen, Robert	30-A	"The preferred route will place our lives and those of our friends, neighbors and employees at risk. The transmission line poles would pose a clear danger to the operators of private and commercial agricultural equipment on adjacent properties, adding to the existing danger posed by the numerous existing electric lines in the area. Visually calculating clearance distances of fertilizer and spray application equipment—such as the 80-ft wide machinery operated by our family-owned agribusiness, Windflow Fertilizer—is a difficult task prone to error with potentially disastrous results. The poles and lines also would present a severe safety hazard to operators of planting, cultivating and harvesting equipment on properties along the BLM-preferred route. These hazards place our families' and our employees' lives in danger."	Typically, structures can be placed as to avoid the circle irrigation systems. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on center-pivot irrigation systems is covered in Section 4.4 of the DEIS and Section 4.4 of the FEIS.
Christensen, Robert	30-B	"The poles and lines would further place workers in severe danger during regular maintenance and unscheduled repairs of farm irrigation systems, such as center pivot sprinkler systems. Such operations often entail lifting segments of metal irrigation pipe into place. Crane or boom truck operators performing maintenance or repairs near the end of center pivot irrigation systems—especially those with an extending/retracting end-segment "swing-span" or an "end gun" sprinkler (having an exit orifice diameter on the order of one inch)—frequently would be placed in extreme danger along the BLM-preferred route."	Typically, structures can be placed as to avoid the circle irrigation systems. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting. Impacts on center-pivot irrigation systems is covered in Section 4.4 of the DEIS and Section 4.4 of the FEIS.
Christensen, Robert	30-C	"In addition, herbicide and insecticide aerial spray application airplane operation would be obstructed along the preferred route, just as pilot safety would be endangered near the preferred route. In this vein, the Yakima Herald has reported that "[a]ll of the proposed routes avoid the training center and the Desert Aire area, south of Mattawa, primarily because of concerns over aircraft safety," because the "U.S. Army expressed concern that an above-ground crossing of the training center would pose a safety risk for military helicopters involved in training exercises." <sup>1</sup> Frankly, we are more concerned about the threat to human life than to helicopters or other aircraft, per se."	The BLM and Cooperating Agencies have carefully considered the effects of the project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Christensen, Robert	30-D	<p>"Nevertheless, in total disregard for the safety of civilians, the proposed transmission line would cross perpendicular to the approach path less than a half mile east of the Christensen private airport, established in 1975. The airport has been used nearly on a daily basis since its inception by private pilots as well as periodically by aerial spray application airplanes. A proposal to extend the runway toward the east (even closer to the BLM-preferred route, since the runway is bordered on the west by Grant County Road 'O' SW) recently has been under consideration in order to accommodate a family member's twin-engine Piper Cheyenne, which requires greater runway length for landing."</p>	<p>Thank you for informing the BLM, Cooperating Agencies and Pacific Power regarding the potential future use of your property. Impacts to residential parcels are detailed in Section 4.4.3 and 4.4.4. of the FEIS</p>
Christensen, Robert	30-E	<p>"Furthermore, the preferred route would place families at risk as it passes nearby long established residences and farmyards. Research has linked long-term exposure to power frequency electromagnetic fields (EMF) to chronic health issues from stress and fatigue to cancer. Many scientists agree that EMF exposure from electrical transmission lines have carcinogenic effects, although as with historic public health threats—including toxic waste leakage from the nearby Hanford nuclear reservation—years may pass before action replaces words. In the meantime, people are already getting sick."</p>	<p>Potential electromagnetic effects of the proposed Project is covered in Section 4.16.1.1 of the DEIS and Section 4.16.2 of the FEIS.</p>
Christensen, Robert	30-F	<p>"We further oppose the preferred route on grounds that installation, access, operation and maintenance of the transmission line would be more costly and wasteful than other alternative routes. An alternative route across the U.S. Army Yakima Training Center (YTC) or along the west bank of the Columbia River would be more reasonable from both a land use perspective and an economic perspective. An alternative route across the YTC not only would be shorter but also could take advantage of resources common to existing parallel existing transmission lines, such as access roads, gates and culverts, in order to minimize the required amount of new construction. These synergies would also result in a reduction in the required total area of newly acquired right of way and associated costs of the installation, operation and maintenance of the transmission line that would be significantly greater than the reduction in mere linear distance covered."</p>	<p>A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Christensen, Robert	30-G	"It also is not clear that sufficient consideration was given in the Pacific Power and BLM transmission line routing studies and cultural studies to the possible location of the transmission line along the west bank of the Columbia River. Concerns regarding the possible disturbance of native-American artifacts would be greatly diminished by the former railroad construction and operation. Oral comments by Rex Buck of the Wanapum tribe during the February 6, 2013 open house meeting held in Desert Aire, Washington indicated the Wanapum tribe would be willing to cooperate with such a venture."	During the Preferred Route Selection Workshop held in Yakima, Washington on May 17, 2012, representatives from the Confederated Tribes and Bands of the Yakama Nation and Wanapum Band of Indians stated their preference for Route Segment 3c (Wahluke Slope) over Route Segment 3b (west side of Columbia River) due to the presence of sites of religious and cultural significance. The range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.
Gearheart, Haynes & Sylvia	31-A	"There is virtually no mention of the massive effect the "preferred Route D" on the agricultural culture in the farm areas of blocks 251 and 253 in the South Columbia Basin Irrigation District."	Specific blocks used for agriculture are not typically discussed in the FEIS due to the scale of the proposed Project. However, current agricultural land uses and impacts, which includes those occurring on Blocks 251 and 253, are discussed in Sections 3-4 and 4-4 of the FEIS, and are mapped in Appendix A.
Gearheart, Haynes & Sylvia	31-B	"In addition, the projected costs of line construction, as per your projections, becomes suspect as a result of your outright favoritism."	Construction cost detailed in Section 4.9.2 of the FEIS were not based on agricultural or other land uses, but on estimated materials, labor, terrain crossed by alternative, and other factors. Right-of-way acquisition costs, which would reflect agricultural or other current uses of land, are not included.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Gearheart, Haynes & Sylvia	31-C	<p>"Reading Paragraph 2.8, starting on p. 2-85 concerning the BLM Staff invitations sent to all organizations listed (they call it the private meeting) was the notable absence of any invitations to any Agricultural organizations to speak for the landowners and famers to whom this geographical area is of greatest concern. Not even WA State Dept of Ag representatives were invited to the "private" meeting. The way this whole project has been organized seems to us, the landowners and agriculturalists, is to make sure there would be no opposing statements made or considered. Only the pronounced "D" route selected by the BLM staff members was to be considered. It seems as though the farmers, and/or land owners were not worthy of being heard at this "private" meeting. The denial of an opportunity to land owners/farmers to express opposing statements at this "private" meeting, organized by the BLM verges on, if not becomes, an actual denial of our civil rights under the Constitution of the United States. If this already selected 110" Route were submitted to a vote of the people being impacted, it would most likely be rejected outright. The Staff of the BLM seem to be bent on ignoring the best for the people who actually own and make the land productive. The BLM Staff appear to be determined to shaft the farmers and land owners for the exclusive benefit of the favored and special interest groups that have submitted EI statements. Not one of the invited guests has or will have any investment of time and money in this area as compared to that of land owners and farmers in their operations."</p>	<p>The Preferred Route Selection Workshop was held by the BLM and included 40 participants primarily from Cooperating Agencies, including a Grant County representative. Council of Environmental Quality regulations requires public participation in the National Environmental Policy Act process in the form of project scoping and public comment on EIS documents, but do not require public participation in the Agency Preferred Alternative selection process. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.</p>
Gearheart, Haynes & Sylvia	31-D	<p>"For many reasons there is only <u>one</u> route on which to place the intended power line, and that is to use the old Milwaukee Railroad right-of-way on the west side of the Columbia River for its construction."</p>	<p>Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.</p>
Hull, Phil	32-A	<p>"In 2010, Zirkle Fruit Company granted a 60' driveway easement to a neighbor in the southeast corner of Grant County Parcel Number 150269002, which is located in the SE 1/4 of the SE 1/4 of Section 27, Township 16N, Range 23E. It appears that a proposed transmission line tower, or its right-of-way, may encroach on this easement. Zirkle Fruit Company is opposed to any transmission tower or right-of-way that would restrict the use of this easement."</p>	<p>Typically, structures can be placed as to avoid driveways and other property access points, and Pacific Power will work with each land owner to minimize impacts on these facilities.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Amundson, Robert	33-A	"I am disappointed that BLM's EIS presents limited alternative routes that run predominantly through private property and will cross within critical distance of two known sage grouse leks. Furthermore, these routes are almost double the length of a once proposed northern route that was eliminated by the US military because of potential hazards to helicopter flights. If this line were new to the area then I would see that this could be a concern. However, a line already exists and several other lines approach the area of the firing center near Vantage. Since several lines already exist on the center and pilots need to train for action in real conditions (power lines), this seems like a very thin reason for not using this route. I object to all the proposed alternative routes in this EIS because they will not provide efficient power because of the substantial increased costs necessary to procure productive agricultural land and the added length of the power lines. Thus, I strongly urge the BLM to consider the "no action option" since all the other options presented greatly increase the listed impacts in the EIS's abstract (see below) compared to a potential but denied route parallel to an existing 230 kV line north of the Yakima Training Center (JBLM YTC)."	<p>The range of alternatives presented in the DEIS and FEIS are located on both public and private lands, and Sage-Grouse impacts associated with the alternatives were covered in Section 4.3.3.3 of the DEIS and are expanded on in the FEIS. Information regarding Sage-Grouse is included in Section 4.3.3.4 and Appendix B-5 of the FEIS.</p> <p>A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.</p>
Amundson, Robert	33-B	"As a second choice from the "no action alternative", if forced to choose from the present alternatives then I would choose the following: Use routes 1a and 1b."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Amundson, Robert	33-C	"At the point of departure for route 2a, I suggest that 1 b continue along the southern border of the Yakima Training Center (YTC). Poles can be erected next to existing roads and fire trails that are owned and maintained by YTC. I think a continuation along the YTC border would have fewer impacts on artifacts, sage grouse, vegetation, and endangered species, and would minimize the risk of introduction of noxious weeds than the 2a and 2c segments proposed. This proposed route should link up with route 2b at the southern-most boundary of the YTC. Moving east along route 2b that follows the YTC boundary, I propose that the line should continue along the YTC border north then east then north again until it intersects with the proposed route 3b."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Amundson, Robert	33-D	"Finally, the line should follow route 3b to the Vantage Sub-station. This is the shortest route of all alternatives and has the least impact on private land. Caution should be taken in avoiding the Wanapum Village."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Amundson, Robert	33-E	"It appears that the most cost effective route to meet the goal of producing a third 230 kV line to mitigate the risk of power failure to the Yakima area would seem to be the northern route that was eliminated. I suggest that the BLM reconsider using this route and work with JBLMYTC to minimize risks to JBLMYTC personnel by placement of the line."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Charvet, Henry (Martina)	34-A	<p>"I am a resident outside the area that you are proposing for a high density power line. However I travel this area quite frequently and It upsets me that BLM / Pacific Power is thinking of adding a huge line in this area. We already have lines running East and West from the Columbia River and seems as thou this project could be hooked on to one of these lines. The area that you are proposing has been pristine for all of my lifetime and I would think that there is a better way than down Hwy 24! Why can't this project go along the existing project across the Yakima Training center where very few people would ever see these lines."</p>	<p>A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.</p>
Gilfoil, Thomas	35-A	<p>"Why should we - the ratepayers- fund another line when we are at the same time being told by Pacific Power that due to lower sales of power (from conservation efforts) the rates need to be increased? If we are using less power then we don't need new power lines."</p>	<p>The Pacific Power's stated need for the proposed Project is related to system reliability and redundancy, and peak load specific to Yakima Valley, not the overall amount of energy sold. Please see Section 1.3 of the DEIS and Section 1.6 of the FEIS.</p> <p>The Project is proposed for electrical utility regulated reliability needs based on current and projected electric load requirements, and is part of a regional need to provide reliable electric service Pacific Power's customers. It is proposed to meet current and projected electric load and regulatory requirements.</p>
Gilfoil, Thomas	35-B	<p>"If there are already existing lines going across the Yakima Firing Range and the new ones could simply run parallel to those lines (as Mr. Martinez states in his letter) why not use that route which is much shorter and hopefully less expensive?"</p>	<p>A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Martinez, Mike	36-A	"Thus, we strongly urge the BLM to consider the "no action option" since all the other options presented greatly increase the listed impacts in the EIS's abstract (*see below) compared to a potential but denied route parallel to an existing 230 kV line north of the Yakima Training Center (JBLM YTC)."	<p>Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.</p> <p>A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.</p>
Martinez, Mike	36-B	"If forced to choose from the present alternatives then we choose the following: Use routes 1a and 1b. By using route 1b rather than 1c an existing road can be used."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Martinez, Mike	36-C	"At the point of departure for route 2a, we suggest that 1b continue along the southern border of the Yakima Training Center (YTC). Poles can be erected next to existing roads and fire trails that are owned and maintained by YTC. We think a continuation along the YTC border would have fewer impacts on artifacts, sage grouse, vegetation, and endangered species and would reduce the potential introduction of noxious weeds from the activities around building the line along the existing perimeter road than building the line along the 2a and 2c segments proposed. We think this because the perimeter road along the fence could be used for moving construction equipment. This proposed route would link up with route 2b at the southernmost boundary of the YTC. Moving east along route 2b, we propose that the line should continue along the YTC border north then east then north again until it intersects with the proposed route 3b. By following the YTC fence north to a point that would intersect with route 3b it would eliminate the proposed route section 2d. We suggest this because the proposed route 2d would come close to a BLM area of critical environmental concern (ACEC) near the Columbia River."	<p>A similar route to this was looked at during the preliminary routing of the line. Please see Section 2.6.4.3 of the DEIS for an explanation of that alternative considered and eliminated. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.</p>
Martinez, Mike	36-D	"In addition, there is a proposal for that portion of the Columbia River to be designated a wild and scenic river. By building along route 2d to the route 3 segment instead of along the YTC fence the line would intercept the Columbia River at a point that would visibly degrade the nature of a wild and scenic river."	<p>Impacts on this portion of the proposed Wild and Scenic River of the Columbia River are discussed in Section 3.5.2.5 of the DEIS and Section 3.5.2.5 of the FEIS.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Martinez, Mike	36-E	"Finally, we prefer route 3b to the Vantage Sub-station over route 3c for several reasons. Route 3b is shorter than route 3c and would thus cost less to build. Route b will minimally impact private lands and agricultural lands; whereas route 3c will run for miles through agricultural land. None of route 3b, as we suggest, would run along a part of the Columbia River that may be designated wild and scenic. Several miles of route 3c would visually degrade the wild and scenic status of that part of the river since it runs close to this section of the river for several miles."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Martinez, Mike	36-F	"Additionally, the point at which route 3c crosses the river is a section of the river with a high density of potential spawning areas. Has the BLM taken into consideration any potential impact of the lines' effect from predators perching on the lines. Furthermore, have any studies been done on the potential for the increased electromotive energy affecting spawning activity?"	Discussion of the potential for predation on fish due to perch augmentation for avian predators has been included in the FEIS (Section 4.3.3.2 of the FEIS). To our knowledge, the potential for the increased electromotive energy affecting spawning activity has not been studied.
Malone, Christy	38-A	"Please note that Sage Trail Road is a private road, not a county maintained road. We have a single lane wooden bridge, also privately maintained, that must be crossed to access our road."	Comment noted. The FEIS has been modified to include clarification that Sage Trail Road is a private road (Section 4.7.4).
Malone, Christy	38-B	"From what I have read, there is no mention of any mitigation for the impact of heavy machinery and equipment traversing our bridge (which has holes in it now) and degrading our gravel road to put up a power line that in no way benefits our neighborhood. We as the owners of that private road are supposed to absorb these impacts along with the reduction in our property values so Pacific Power can provide power for future growth to a community 20 miles away at our expense?"	While the bridge the commenter refers to is not specifically mentioned in the DEIS, "Required Design Features" (RDFs) will be employed as detailed in Section 2.3.3 (LU-1) of the FEIS that includes replacement or repair of existing land improvements that are damaged or destroyed during construction by Pacific Power.  The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Malone, Christy	38-C	"I am opposed to the proposed location of an above ground transmission line along Sage Trail Road. That location places the highest impact on our view corridor"	As described in Section 2.2 of the SDEIS, Route Segment 1a presented in the DEIS was modified to accommodate a single affected landowner on the route segment's west end (becoming NNR-1). After the publication of the SDEIS, a landowner meeting was held by Pacific Power for affected landowners located on Sage Trail Road (see Section 5.3.4) to provide a forum for landowners to communicate concerns and discuss the design, construction and maintenance of the Project. During the meeting, additional modifications to Route Segment 1a/NNR-1 were proposed by the affected landowners. As a result, the western-most portion of Route Segment 1a/NNR-1 was modified to avoid Sage Trail Road and routed to the south of the residences fronting Sage Trail Road along an approximately 0.75-mile long section located directly east of the Pomona Substation. This modification has been incorporated into the analysis of all Action Alternatives presented in this FEIS.
Malone, Christy	38-D	"and on our daily exposure to emissions from those lines as we drive under them. We will not be able to sit outdoors and listen to the birds, we will be bombarded with the white noise of transmission lines instead."	Potential electromagnetic and audible noise effects of the proposed Project are detailed in Sections 4.16.1.1 and 4.16.1.2 of the DEIS and Sections 4.16.2 and 4.16.3 of the FEIS.
Wildman, Tedd	39-A	"The currently proposed route would negatively impact my ability to efficiently farm a significant portion of this parcel. Mandatory vacation of the entire right of way would take approximately ten acres of production, representing an annual opportunity cost of approximately \$12,000 per year, 0.825% of which goes to DNR as cash rent. Furthermore, any conceivable configuration of tower footprint would result in disruption of farming practices, loss of property value, loss of crop production value, and place an unacceptable burden on my operation."	The construction of the proposed Project would not require mandatory evacuation of the entire ROW corridor. With regards to parcel #40-0877-100, final siting of the proposed Project in this area could occur on Bureau of Reclamation land directly to the east of this parcel, completely avoiding the vineyard. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and route to minimize impacts to resources through micro-siting.  The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.
Wildman, Tedd	39-B	"According to the low resolution map provided by Pacificorp, the route crosses the Columbia River into Grant County at approximately Road N SW, and continues north until Road 24SW. There it takes a 90 degree turn west to Road O, and then north and ultimately on the east border of the above described property, and then onto BLM land. I am formally requesting an explanation of why the route makes this sudden change in direction, rather than simply continuing north on the line of Road N."	This route changes direction because of the orientation of agricultural lot lines and fields north of Road O along the Road N SW axis. Continuing north would potentially affect more agricultural land than by maintaining an alignment along the periphery of crop land located along Road O and Road 24 SW where much of the crop land can be spanned or avoided.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Wildman, Tedd	39-C	"Furthermore, the rationale and justification of the proposed transmission line is questionable. It has been reported that rate payers will be subjected to a rate increase to compensate Pacificorp for revenue shortfalls due to reduced power consumption (The Yakima Herald, Feb. 11, 2013). At the same time, the new transmission line will ultimately be paid for by rate payers. This is illogical at best and double dipping at the worst. If the line is to be built at all, the most logical route and the shortest distance is a more direct line between the two points, and would run parallel to an existing 230 kV line on the Yakima Firing Center. There, to my knowledge, are no farming operations to be adversely affected, and the long term impacts would be no greater than in the current configuration."	<p>The Pacific Power's stated need for the proposed Project is related to system reliability and redundancy, and peak load specific to Yakima Valley, not the overall amount of energy sold. Please see Section 1.3 of the DEIS and Section 1.6 of the FEIS.</p> <p>The Project is proposed for electrical utility regulated reliability needs based on current and projected electric load requirements, and is part of a regional need to provide reliable electric service Pacific Power's customers. It is proposed to meet current and projected electric load and regulatory requirements.</p>
Badissy, Zine	40-A	"I cannot accept your design because it impact my farming business."	Comment noted.
Buermann, Ronald & Judith	41-A	"Running the 230 kV transmission line on Sage Trail Road would have a huge environmental impact in the area. The impact would be the visual of the transmission line from sensitive viewers, scenic views would change, change in natural scenery and road use impact. See table 3.8-4 in the BLM DEIS. Our property area is zoned Rural Remote."	As described in Section 2.2 of the SDEIS, Route Segment 1a presented in the DEIS was modified to accommodate a single affected landowner on the route segment's west end (becoming NNR-1). After the publication of the SDEIS, a landowner meeting was held by Pacific Power for affected landowners located on Sage Trail Road (see Section 5.3.4) to provide a forum for landowners to communicate concerns and discuss the design, construction and maintenance of the Project. During the meeting, additional modifications to Route Segment 1a/NNR-1 were proposed by the affected landowners. As a result, the western-most portion of Route Segment 1a/NNR-1 was modified to avoid Sage Trail Road and routed to the south of the residences fronting Sage Trail Road along an approximately 0.75-mile long section located directly east of the Pomona Substation. This modification has been incorporated into the analysis of all Action Alternatives presented in this FEIS.
Buermann, Ronald & Judith	41-B	"Chapter 2, Section 2.4.2.1 of the BLM DEIS states: "that all new equipment will be installed within the existing Substation fence." This is in fact not true because there are plans to now enlarge that Pomona Heights Substation 40 feet to the South."	Comment noted. The most current plan for substation upgrades and expansion are detailed in Section 2.1.2 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Buermann, Ronald & Judith	41-C	<p>"Since the transmission line is proposed to run on Sage Trail Road at the base of my property line numerous trees would have to be removed to install the line. Our scenic view and those of others on Sage Trail Road including the Country Squire Mobile Park would be impacted because using H-frame or monopole transmission structures would put the transmission lines at view height. In other words, you would look out our view windows directly at the transmission wires and poles. See Chapter 3, page 254, Immediate Foreground in the BLM DEIS."</p>	<p>As described in Section 2.2 of the SDEIS, Route Segment 1a presented in the DEIS was modified to accommodate a single affected landowner on the route segment's west end (becoming NNR-1). After the publication of the SDEIS, a landowner meeting was held by Pacific Power for affected landowners located on Sage Trail Road (see Section 5.3.4) to provide a forum for landowners to communicate concerns and discuss the design, construction and maintenance of the Project. During the meeting, additional modifications to Route Segment 1a/NNR-1 were proposed by the affected landowners. As a result, the western-most portion of Route Segment 1a/NNR-1 was modified to avoid Sage Trail Road and routed to the south of the residences fronting Sage Trail Road along an approximately 0.75-mile long section located directly east of the Pomona Substation. This modification has been incorporated into the analysis of all Action Alternatives presented in this FEIS.</p>
Buermann, Ronald & Judith	41-D	<p>"In the BLM DEIS Chapter 3, item number 3.8.4.1 states: Other existing development along this route includes a 230 kV wood single pole and H frame transmission line crossing Sage Trail Road and various electrical distribution lines as well as various gravel roads and driveways. The reality is that transmission line crosses Sage Trail Road over 3/4 of a mile up Sage Trail Road. Some of the electrical distribution lines are to the South of Sage Trail Road behind my property."</p>	<p>This is a general description of the current infrastructure development along Sage Trail Road and is not a specific discussion relative to any particular piece of property.</p>
Buermann, Ronald & Judith	41-E	<p>"Sage Trail Road is a private road not maintained by Yakima County. The homeowners on Sage Trail Road pool their money to maintain the road. Access to Sage Trail Road is by a single lane bridge. Chapter 3, section 3.7.2.2. page 236 in the BLM DEIS-County Roads, states: "The road is primarily chip sealed but becomes grave/layered further west as it turns into John Street." Sage Trail Road is only paved as it comes off E. Selah Road for about 300 yards. Just before the single lane bridge and after, it is a gravel road only. Increased construction traffic, i.e. trucks, bull dozers, dump trucks, equipment &amp; material trailers, tractors, trailers, fork lifts, cranes, line trucks, bucket trucks, water trucks, (you get the picture) etc. could cause considerable harm to the bridge and roads."</p>	<p>Comment noted. The FEIS has been modified to include clarification that Sage Trail Road is a private road (Section 4.7.4 of the FEIS). While the bridge to commenter refers to is not specifically mentioned in the DEIS, "Required Design Features" (RDFs) will be employed as detailed in Section 2.3.3 (LU-1) of the FEIS that includes replacement or repair of existing land improvements that are damaged or destroyed during construction by Pacific Power. The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Buermann, Ronald & Judith	41-F	"There is also a medium sized mobile park with at least 60 mobile homes directly behind where they want to put the new 230 kV transmission line, just below my property to the North. It is my understanding they eliminated another route because of the mobile park. Why would they include it in route 1a now?"	Previous alternatives considered and eliminated included routes that went generally north from the Pomona Heights Substation were eliminated for various reasons as detailed in Section 2.6.4 of the DEIS, not specifically because of impacts on the mobile home park. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.
Buermann, Ronald & Judith	41-G	"With regards to Wildlife I know of no threatened species in the immediate area. However, there is a nesting area for owls just below parcel #191305-21421 which would be a shame to have disturbed."	Section 4.3 of the DEIS discusses special status wildlife species in the project area. Special status wildlife species are discussed in Section 4.3.3.5 of the FEIS. Pre-construction surveys would occur to minimize impacts on wildlife.
Martinez, Bradley	42-A	"As a concerned land owner affected by this project, I am not in agreement with the proposed route 2c. It will have a negative impact on the farm and range land that it will run through."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies. Impacts on farming and rangeland is detailed in Section 4.4.3 and 4.4.4 of the DEIS and in Sections 4.4.3 and 4.4.4 of the FEIS.
Martinez, Bradley	42-B	"Also it will disrupt the native ecosystem including, nesting hawks, sage grouse, owls, jack rabbits and native grasses and shrubs."	Impacts on wildlife and vegetation are detailed in Section 4.3 and 4.2 of the DEIS and FEIS, respectively.
Martinez, Bradley	42, C	"I believe the 1a and 1b routes, which run along the south boundary of the Yakima Training Center, would be more advantageous to land owners, BLM, and PP&L. The poles and lines could be placed along the existing road and firebreaks, making lines more accessible while decreasing the damage to natural habitat, artifacts, wildlife, and vegetation."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Martinez, Bradley	42-D	"Along preferred route 2c, Bonneville Power, PP&L, and Benton REA already have existing lines. I am concerned about the health ramifications of voltage humming along the lines for those of us that live between your proposed 2c line and the Bonneville Power lines. I do not want to subject my family, employees, livestock, and crops to any detrimental health risks associated with overhead power exposure."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies
Martinez, Bradley	42-E	"In addition, the placement of this line through viable farm ground will decrease our land values, and decrease crop production. We need to protect one of our most important resources the American Farmer."	Potential impacts of the transmission line on agricultural value and crop production is detailed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Martinez, Carol	43-A	"This route will be very expensive and this burden will be paid solely by the PP&L customers."	Cost estimates of the proposed Project are included in the DEIS in Section 4.9.2 and in Section 4.9.2 of the FEIS. Costs of the proposed Project will be apportioned across the six states where PacifiCorp operates, based on pre-set state allocation methodologies by utility regulators. Costs to Pacific Power's Washington customers are allocated according to Washington's relative energy and demand usage in the three Pacific Power states.
Martinez, Carol	43-B	"This route also crosses many miles of private agriculture land some of which is under pivot irrigation and some in intensively producing orchards."	The disturbance to irrigated and non-irrigated agricultural areas crossed by the proposed Project Action Alternatives are detailed in Section 4.4.4 and Table 4.4-10 of the DEIS and FEIS.
Martinez, Carol	43-C	"Private residences will also be directly affected by this route."	Impacts on residential land use is detailed in Section 4.4.4 and Table 4.4-10 of the DEIS and Section 4.4.4 and Table 4.4-2 of the FEIS.
Martinez, Carol	43-D	"The initial proposed routing in 2008 was to follow the existing PP&L Pomona-Wanapum 230kv line across the Training Center (JBLM YTC) on the northern boundary. The Army now claims it will only allow an underground line. This of course would be outrageously expensive. Surely there must be some alternative engineering methods that will minimize the Army's concerns. For instance the distance between the right of ways of two power lines could be lessened by the addition of more towers in the longer spans of the existing line. (Distance between separate power lines is dependent on length of line between towers) Much of the existing line is located on high ridges and on sparse sage brush desert terrain. This northern area has traditionally been a buffer zone with very little observable activity. There are already three other power lines on the eastern edge of the YTC (Wind Ridge-Wanapum, Schultz-Wautoma and Schultz-Vantage). Every possible effort should be made to secure this route."	A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.
Martinez, Carol	43-E	"In the event the YTC refuses to be a good neighbor and allow the northern crossing, a route following the southern boundary of the training center would be the next logical solution."	An alternative following the southern boundary of YTC was considered and eliminated, and detailed in Section 2.6.4 of the DEIS. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Martinez, Carol	43-F	"Zone 2 South Side Why hasn't a route that continues to follow the Army boundary been studied? Why have there been detours around the DNR sections and BLM parcels instead of continuing along the boundary fence line as in the preceding 9 miles to the west?"	An alternative following the southern boundary of JBLM YTC was considered and eliminated, and detailed in Section 2.6.4 of the DEIS. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.
Martinez, Carol	43-G	"Sage grouse was mentioned during the public meeting. Where are the studies for this claim? What is the number of birds involved and how much time do they spend in this area? What times of the year are they present?"	It is unknown what claim the commenter is referring to. Effects on Sage-Grouse were covered in the DEIS in Section 4.3.3.3, and additional studies have occurred as a result of DEIS public comments. Please see Section 3.3.2.3, Section 4.3.3.4, Appendix B-1, Appendix B-2, Appendix B-5, and Appendix B-6 of the FEIS for impacts and studies conducted relative to Sage-Grouse.
Martinez, Carol	43-H	"The route along the old railroad right of way was rejected because of Indian artifacts. Why is it not possible to identify the most important artifacts/sites and either remove and relocate them or engineer the towers around them. The land between the towers will not be disturbed. There is an existing road way in the area already. The selection of the Grant county route will be very costly as many highly intense farming operations and residences will be drastically affected. Has PP&L made any estimation of the costs involved crossing this area?"	The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. The effects of the proposed Project, including those occurring as a result of following the railroad (Route Segment 3B), are detailed in Section 4.11.4.9 of the DEIS and FEIS. The comparison of alternatives is presented in Section 2.7 of the DEIS and Section 2.6 of the FEIS.  Proposed Project costs are detailed in Section 4.9.2 of the DEIS and Section 4.9.2 of the FEIS; specific costs related to agricultural impacts have not been calculated due to the complexity of conducting such a study and because costs would only be known after a comprehensive land value assessment is completed. This is beyond the scope of the DEIS and is not required to compare alternatives. A comparison of potential agricultural impacts is presented in Section 4.4 of the FEIS.
Martinez, Carol	43-I	"Lastly, the BPA has just given notice of intent to rebuild the Midway-Moxee 115 kv line. Why not change this to a 230 kv line and carry the power that PP&L needs to transport to the Yakima Valley, at least for that part of the way?"	Building two transmission lines on one structure (double-circuiting) can cause reliability issues if they serve the same area and structures fail (both lines would go down). Strict North American Electric Reliability Corporation and Western Electricity Coordinating Council standards apply to building lines on the same structures or parallel to other transmission lines. In addition, jointly owning transmission infrastructure with non-Pacific Power entities creates issues with meeting reliability standards and management criteria.
Martinez, Carol	43-J	"So why do we need more transmission lines and why do we need to have our rates increase even more?"	The need for the proposed project from the Pacific Power's standpoint is detailed in Section 1.2 of the DEIS and Section 1.6 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Bangs, Susan	44-A	"My belief is the no-plan alternative until, buried cable is possible or other innovations arise, is the best choice."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Lyll, Charles	45-A	"My concern is with alternative 3c. It has many problems that I feel preclude it from being considered as the best alternative. It will track thru pristine farm ground that needs to be protected from unneeded and unwanted intrusion. This farm ground is some of the best, most expensive and most sought after pure farm ground in the state. Another power line in this area will detract from this valued asset. There are already many major power lines running across the slope that interrupt efficient farming and add danger to our operations. Alternative 3c as it is now, goes over the top of houses, major ponds, canals, orchards, vineyards, open ground, and alongside laterals, hay stacks, and equipment yards. This intrusion I believe is unacceptable considering the other better alternatives open to Pacific Core for the line."	Comment noted. The alternative preference has been considered by the BLM and Cooperating Agencies. Impacts on agriculture and a comparison of alternatives is covered in detail in the DEIS. Please see Sections 2.7 and Section 4.4 of the DEIS and Sections 2.6 and Section 4.4 of the FEIS.
Lyll, Charles	45- B	"Specific Concerns and Alternatives: 1. Construction on private ground should be single pole to minimize their foot print."	The use of single pole structures proposed to be used in areas where the minimization of structure footprint will mitigate land use and other resource impacts such as in agricultural areas or where the proposed Project follows a road. However, single pole structures need to be placed closer together than H-frame structures, and therefore, require more structures per mile of transmission line.
Lyll, Charles	45-C	"2. Line construction on laterals should be on the opposite side of the maintenance road."	Pacific Power will work with the irrigation districts to minimize impacts on these facilities as well as adjacent landowners.
Lyll, Charles	45-D	"3. On all irrigated ground, design should allow for orchard trees of at least 16 feet in height to grow under the line."	Pacific Power will work with each land owner utilizing agricultural equipment to minimize impacts on operations. Minimum clearance standards would be required. The height of the conductor wires are dependent on many factors, including height of the structures, temperature, line electrical load, and other factors that limit how high or low the conductor wires are from the ground.
Lyll, Charles	45-E	"4. Construction should go along side or with existing lines to minimize foot print."	The proposed Project has been sited to maximize the distance it follows existing transmission line facilities, but agricultural and other development adjacent to some existing lines in the Project area limits the potential for paralleling in some cases.
Lyll, Charles	45-F	"5. Existing structures (houses, shops, buildings) must be avoided."	Pacific Power will work with each landowner to avoid existing structures.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Lyall, Charles	45-G	"6. Irrigation equipment (circles, pumps, structures) have to be avoided and not interrupted during use."	Pacific Power will work with each land owner utilizing agricultural equipment to minimize impacts on operations. Minimum clearance standards would be required.
Lyall, Charles	45-H	"7. Maintenance must be done with owner's permission due to new food safety rules."	Pacific Power will work with agricultural operators to ensure vegetation management techniques and maintenance is coordinated with the landowners or lessors.
Lyall, Charles	45-I	"8. Weed control is a major must and all herbicide use reported to land owner."	Pacific Power will work with agricultural operators to ensure vegetation management techniques and maintenance is coordinated with the landowners or lessors.
Lyall, Charles	45-J	"If 3c is approved as is it will denigrate the existing pristine view of the mountain."	The potential visual impacts of Route Segment 3c are detailed in Section 4.2.8.5.10 of the FEIS.
Lyall, Charles	45-K	"Add habitat and environmental concerns."	Wildlife habitat impacts are discussed in Section 4.2 of the DEIS and Section 4.3 of the FEIS.
Lyall, Charles	45-L	"It goes to close to an existing cellphone tower affecting a vital service."	Potential impacts on cell phone reception are detailed in Section 4.16.8 of the FEIS.
Lyall, Charles	45-M	"A new line in that area will also be an added risk to the military training jets that use that corridor on a regular bases."	Impacts of Route Segment 3c on military operations were not identified by the US Army as a cooperating agency during the development of the DEIS. Refer to Chapter 4.4.3 and 4.4.4 of the FEIS for information regarding impacts to military operations.
Lyall, Charles	45-N	"Conclusion: The best alternative is to go across the Firing Center or up the rail road write away. 1. Willing land owner 2. Shorter rout 3. Less impact"	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Yakama Nation	46-A	"Archaeological surveys have been conducted by our office on federal lands within proposed Routes 1b, 3a, and 3c; and 31 newly identified archeological sites associated with Native American and historic land use have been recorded."	Data from the surveys being conducted are being integrated into the analysis, and resources will be avoided in accordance with the Programmatic Agreement. Refer to Sections 3-11 and 4-11 of the FEIS.
Yakama Nation	46-B	"Yakama Nation CRP concurs with the Agency Preferred Route 3c and 2c"	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Yakama Nation	46-C	"However, while the alternative Route 3c is preferred to 3b, impacts to cultural resources on the Lower Crab Creek and Saddle Mountains remain a concern."	Comment noted.
Yakama Nation	46-D	"In addition, Yakama Nation CRP would like to highlight that there are no proposed alternatives to 1a, 2a, and 2d which is concerning and problematic."	Alternatives have been considered and eliminated along Route Segments 1a, 2a, and 2d and were not carried forward for analysis. Please see Section 2.6.4 in the DEIS. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.
Yakama Nation	46-E	"Route 2d may impact Yakima TCP and no alternatives are proposed for this route (which is entirely within private lands)."	Data from the surveys being conducted are being integrated into the analysis, and resources will be avoided in accordance with the Programmatic Agreement. Refer to Sections 3-11 and 4-11 of the FEIS.
Yakama Nation	46-F	"Page ES-iv states that cultural resources were "inventoried" at 75 feet and 250 feet from the assumed centerlines . . ." Utilization of the word "inventoried" in this context is confusing and misleading as the term is often used within the archeological community to indicate survey. Please change the language to reflect that background database research was conducted."	Please see the revised Executive Summary in the FEIS.
Yakama Nation	46-G	"Page ES-iv discusses visually sensitive resources. Yakama Nation Traditional Cultural properties including legendary, monumental, ceremonial, traditional use, burial sites, and spiritual sites are cultural resources that are highly susceptible to visual impacts."	Visual impacts on cultural resources are covered in Section 4.11 of the DEIS and Section 4.11 of the FEIS.
Yakama Nation	46-H	"Page 3- 166; 3.11.4, Route Segment or Zone-Specific Considerations: Please specify in sections 3.11.4.1 through 3.11.4.3 that archeological survey has been extremely limited. Portions of the proposed project have not undergone archeological investigation. For un-surveyed portions of the project it is more accurate to report that there is no data rather than state that there are no archeological resources."	Please see the revised Section 3.11 in the FEIS.
Yakama Nation	46-I	"Page 4-183; 4.11.4, Impacts to Specific Route Segments: Yakama Nation CRP is in the process of surveying portions of the Vantage-Pomona APE. Numerous sites have been found to date and will be provided to the Bureau of Land Management in the near future. Please note that this new data will render information in sections 4.11.4 inaccurate. Many new archaeological resources have been identified within several route segments noted in the DEIS as "low impact" or "no impact" ."	Please see the revised Section 4.11 in the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS	47-A	"We are concerned about possible resource impacts (i.e., sage grouse) from creating a new corridor for this transmission line based on all the information associated with the action alternatives. To minimize the scope and extent of these potential resource impacts, we recommend the Project to include best management practices which limit compaction and disruption of sediments"	Required Design Features SGW-11 and SGW-12 will be implemented to address soil compaction and sedimentation impacts.
USFWS	47-B	"in addition to the minimal removal of sagebrush steppe habitat."	Required Design Feature GEN-3 will be implemented to address vegetation removal impacts.
USFWS	47-C	"We recommend that all noxious weed recommendations specified in all applicable state and county weed regulation are followed to the extent practicable. This should include preventing and eradicating any weed populations introduced from the construction, and reestablishing robust native plant communities."	All State and County regulations will be adhered to.
USFWS	47-D	"During our scoping meetings in 2011, we requested Pacific Power to examine the feasibility of locating portions of the proposed transmission line underground within the context of the DEIS to minimize effect of the project on sage grouse. After review of the DEIS, we see that this type of analysis was only conducted to place the entire transmission line underground. While we appreciate this scale of analysis, expense, and the technology associated with the placement of transmission lines underground, we recommend that the FEIS examine how the placement of discrete sections of the transmission line would result in the retention of habitat corridors for terrestrial species such as sage grouse."	The SDEIS analyzed two discrete segments with Underground Design Options for the NNR Alternative, Route Segments NNR-4u and NNR-6u. Please see the SDEIS and FEIS sections 3.3 and 4.3.
USFWS	47-E	"We would also recommend that the FEIS analyze the extent of any additive effects to sage grouse resulting from the Project alternatives that either includes a single transmission line corridor or locating portions of the proposed transmission within close proximity to existing lines. Based on our review of the document, it's our understanding that this type of additive effects analysis as it relates to sage grouse is not sufficient in the DEIS."	The SDEIS and FEIS were updated to include more information on Sage-Grouse and transmission line corridors. Please see SDEIS and FEIS sections 3.3 and 4.3.
USFWS	47-F	"Our review of the DEIS leads us to the conclusion that appropriate mitigation for sage grouse has not been analyzed or proposed if the Project is to be constructed based on the proposed action alternatives. For example, the southern boundary of the Yakima Training Center likely serves as a habitat corridor for sage grouse. The current design of the action alternatives appears to lack an emphasis on promoting this habitat corridor."	The SDEIS and FEIS were updated to include more information on Sage-Grouse. Please see SDEIS and FEIS sections 3.3 and 4.3.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS	47-G	"We also find that there is no mention of potential land purchase to offset the scope and nature of the Project."	Please see the Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, Appendix B-6, of the FEIS for more information on mitigation to offset project impacts to Sage-Grouse.
USFWS	47-H	"To accommodate these types of mitigation measures, we suggest the FEIS be comprised of the following mitigation approach: The Project's design should adhere to the following standard hierarchy for mitigation: 1. Avoidance... 2. Minimization... 3. Rehabilitation/Restoration... 4. Compensatory Mitigation..."	Please see Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS for more information on how the proposed Project is consistent with the standard mitigation hierarchy.
USFWS	47-I	"For this Project, sage-grouse habitat impacts likely will occur within several sagebrush habitat types, which require a variety of mitigation actions to achieve "no net loss with a net benefit" for sage grouse habitat impacts. The following principles and standards (P&S), as well as the remainder of this blueprint, focus on the last step of the mitigation hierarchy and will inform the development of sage grouse compensatory mitigation actions for the Project. The P&S serve as guidance for: 1. Determining the types and amounts of development action impacts and associated mitigation obligations; and 2. Selecting the habitat restoration, enhancement, protection and other management actions to satisfy the project's mitigation obligations. Project mitigation actions that substantially deviate from these P&S may not be adequate or supportable in terms of issues related to sage-grouse. However, given the BLM's current national planning effort and continuing research on sage grouse, other mitigation requirements and/or options may be identified in the future. Potential future actions should be considered and included in a Project-specific habitat mitigation plan where appropriate."	The SDEIS and FEIS were updated to include more information on Sage-Grouse. Please see SDEIS and FEIS sections 3.3 and 4.3.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS	47-J	<p>"Due to the potential to affect avian resources which fully utilize the proposed project location, we strongly urge the Project proponent to complete an Eagle Conservation Plan (ECP) to minimize the incidents of eagle fatality associated with the Project's infrastructure. Such a document should include mortality monitoring with elevated monitoring efforts during years of high precipitation, when local wetland basins are flooded. Your ECP also should convey tangible commitment to prompt response in implementing strategies for reducing risk of injury and fatality, including appropriate operational modifications, in the event that multiple eagle fatalities or injuries occur. The ECP could be incorporated into a general Bird and Bat Conservation Strategy (formerly known as an Avian and Bat Protection Plan) that would identify and address conservation concerns of other species of migratory birds and bats known or likely to occur at the Project, which we did not consider in our consultations and review of associated documents. The ECP we recommended for the Project would be voluntarily prepared and implemented as a good-faith effort. Nonetheless, it is not possible for the Service to absolve individuals, corporations, or agencies from liability, even if they implement avian mortality avoidance or similar conservation measures."</p>	<p>Per further discussion with USFWS, a Migratory Bird Conservation Plan is included as Appendix B-8 of the FEIS.</p>
USFWS	47-K	<p>"Listed species are likely to occur in the project area. We recommend that the BLM enter into consultation with the Service to consider both immediate and ongoing effects associated with the Project. Due to the presence of sage grouse in the project area, we also recommend conferencing on sage-grouse."</p>	<p>Section 7 of the ESA will be fully complied with. A BA will be prepared and the federal cooperating agencies and USFWS will formally consult on threatened and endangered species protected under the ESA. The BA will be prepared for the Agency Preferred Alternative.</p>
USFWS	47-L	<p>"The BLM should prepare a Biological Assessment (BA) to evaluate the potential effects of the Project on listed species and determine whether any such species are likely to be adversely affected by the action. We recommend that the BLM obtain a current list of ESA species in the project area from the Service website shown above. Under 50 CFR 402.08, the BLM may designate Pacific Power as its nonfederal representative to conduct consultation or prepare a BA. If the BA is prepared by the designated non-federal representative, the BLM must furnish guidance and supervision, and must independently review and evaluate the scope and contents of the BA."</p>	<p>Section 7 of the ESA will be fully complied with. A BA will be prepared and the federal cooperating agencies and USFWS will formally consult on threatened and endangered species protected under the ESA. The BA will be prepared for the Agency Preferred Alternative.</p>
USFWS	47-M	<p>"1.) Protection of Endangered Species, Page 1-14: This section is unclear regarding the protection of endangered species in the project area. The DEIS states that a "grant of right of way by BLM or JBLM-Yakima Training Center" somehow leads to the protection of Endangered Species."</p>	<p>This table has been revised in the FEIS (Section 1.10, Table 1-1 of the FEIS).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS	47-N	"2.) Section 2.5.2 Biological Resources (page 2-46): Sub-section "Bio-2" refers to "Mitigation measures developed during the consultation period under Section 7 of the Endangered Species Act..." Please remove the reference to "mitigation measures" and replace with "terms and conditions" to more accurately represent the measures resulting from any biological opinion that the Service may issue for this project."	Bio-2 was updated in the SDEIS and FEIS to state 'terms and conditions' (Section 2.3.2 of the FEIS).
USFWS	47-O	"3.) Section 3.3.2.2 Federally Threatened, Endangered and Candidate Species (page 3-34): We disagree with the use of the reference BioAnalysts, Inc. 2002 as discussed in this section for bull trout. BioAnalysts, Inc. 2002 is a study that examined the behavioral attributes of bull trout as they migrated upstream and downstream through the mid-Columbia River public utility district-owned hydroelectric projects. We recommend deleting this reference since the context of this section specifically refers to spawning and rearing habitat."	The BioAnalysts, Inc. reference has been deleted from the discussion on spawning and rearing habitat (Section 3.3.2 .2 of the FEIS).
USFWS	47-P	"4.) Section 3.3.2.3 Species of Concern and State-Listed Species (Pacific Lamprey) (page 3-41): We disagree with the statement, "Relatively little is known about the status of Lamprey species within the Columbia River Basin." Extensive studies resulting from the relicensing of the Priest Rapids, Wanapum, Rocky Reach, and Wells hydroelectric Projects have been conducted to assess upstream and downstream passage of Pacific lamprey through these respective Due to the proximity of the Project, we recommend contacting Public Utility District No. 1 of Grant County, owner and operator of the Priest Rapids Hydroelectric Project, to assess their collection of Pacific lamprey studies and the potential for impacts resulting from the Project. Please include relevant information regarding Pacific lamprey in the FEIS."	Additional information regarding Pacific lamprey has been added to the SDEIS and FEIS (Section 3.3.2.4 of the FEIS).
USFWS	47-Q	"5.) Wormskiold's Northern Wormwood, (page 4-11): The depiction of effects to northern wormwood is not accurate. The statement, "It is anticipated that no impacts would occur to Wormskiold's northern wormwood or its habitat" is based on a plant protection plan that has yet to be developed by the applicant. We suggest inserting language into this section that suggests "impacts may occur" in the event sedimentation results from the construction of the water crossing associated with alternative 3B."	Clarifying language regarding impacts to Wormskiold's Northern Wormwood has been included in the FEIS (Section 4.2.3).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS	47-R	"6.) Section 4.3.3.3 Federally Threatened, Endangered and Candidate Species (Bull Trout) (pages 4-44 and 4-45): This examines how possible erosion created by the placement of approximately 200-foot-tall lattice steel structures for the up to 2,800 foot river crossing will be minimized by various erosion and control methods. To minimize the continuing effect of erosion and sedimentation on bull trout in the mid-Columbia River, we request the FEIS to include measures to rehabilitate these sites once the construction for this river crossing has been completed."	RDFs identified in Chapter 2 regarding revegetation of disturbed areas will be applied to bull trout (Section 4.3.3.3 of the FEIS).
USFWS	47-S	"7.) Section 4.2 2011 Survey, (page B-1-10): Please specify when and if the 2011 sage grouse surveys were conducted prior or after military activities were conducted on the Yakima Training Center. As currently stated, there is no mention as to how or if military activities on the Yakima Training Center influenced the results of these surveys."	The text states that surveys were conducted from 0.5 hours before sunrise to 1.5 hours after sunrise. While exact training schedules are not known, it is unlikely that training would have occurred in those areas in the early morning prior to surveys without the surveyors seeing them. Thus it is unlikely that military activities influenced the survey results (Appendix B-1 of the FEIS).
USFWS	47-T	"8.) Section 4.17.4.2 Geographic Scope (pg. 4 -273): We are concerned that no apparent analysis of indirect effects to sage grouse resulting from the Project are assessed in the DEIS. The construction and installation of transmission infrastructure for the proposed action alternatives will likely result in some level of alteration of sage grouse behavior patterns in the project area. We strongly urge the FEIS to include pertinent analysis related to this type of indirect effect."	The SDEIS and FEIS were updated to include more information on Sage-Grouse. Please see SDEIS and FEIS sections 3.3 and 4.3.
USFWS	47-U	"9.) Table 4.17-1 Past, Present, and Reasonably Foreseeable Future Actions by Affected Resource (page 4-275): Please include the Bonneville Power Administration's Midway-Moxee Transmission Line Rebuild Project into this table."	The Midway-Moxee Project has been included in Table 4.17-1 of the FEIS (Section 4.17.5 of the FEIS).
WDOE	48-A	"If contamination is observed during the project, sampling of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily visible, or is revealed by sampling, Ecology must be notified."	If any contaminated soil is encountered by visual inspection or sampling, DOE will be notified as required and as noted in this comment.
WDOE	48-B	"Proper erosion and sediment control practices must be used on the construction site and adjacent areas to prevent upland sediments from entering surface water. Local stormwater ordinances will provide specific requirements. All ground disturbed by construction activities must be stabilized. When appropriate, use native vegetation typical of the site. Any operation which would generate a waste discharge or have the potential to impact the quality of state waters, must receive specific prior authorization from the Department of Ecology."	Required Design Features SGW-11 and SGW-12 will be implemented to address soil compaction and sedimentation impacts (Section 2.3.9 of the FEIS).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
National Park Service	49-A	"According to their DEIS the Washington Department of Fish and Wildlife's Columbia Basin State Wildlife Area is within the project area. A portion of this site, specifically the Lower Crab Creek unit, is protected by LWCF. If any of their final routes will impact this site, they'll need to coordinate their NEPA activities with NPS."	No Alternatives have been identified that cross LWCF lands. See Appendix A (Project Maps) of the FEIS.
Yakama Nation	52-A	"Regardless of the Preferred Route selected in the DEIS, Yakama Nation cannot concur with a final selected route until all necessary cultural resource surveys are completed and all cultural resources are protected."	Cultural surveys were completed for the NNR Alternative identified in the SDEIS. Complete surveys on all alternatives is not necessary to compare alternatives, and complete Class III surveys will be completed on the Final Agency Preferred Alternative to avoid cultural sites in accordance with the Programmatic Agreement. Refer to Sections 3.11 and 4.11 of the FEIS.
Yakama Nation	52-B	"However, on p. 4-28 1, the DEIS states that EDP Renewable (Horizon Wind Energy) has submitted a development application to BLM for a wind energy project including up to 150 turbines in the western half of the Saddle Mountains. Figure 4.17- 1 shows that the proposed Vantage to Pomona Heights Transmission Line would go through several Sections of the proposed Saddle Mountain Wind Farm. On the same page (4-28 I), the DEIS states that the project is 50 miles east of the Vantage to Pomona Heights Transmission Line Project and therefore due to its distance from the Project area, the Saddle Mountain Wind Farm is not considered in the cumulative analysis. This contradiction needs to be clarified." As previously expressed to BLM during the May 17, 2012 Preferred Route Selection Workshop and to the Bonneville Power Administration on several occasions, Yakama Nation expects that all analyses for proposed transmission lines will include the direct and cumulative effects of all wind energy and other energy development projects that will connect to the transmission line. Yakama Nation expects that the above discrepancies will be clarified and that all necessary analyses will be completed prior to issuing a Final EIS.	This section has been revised in the FEIS (Section 4.17 of the FEIS).
Yakama Nation	52-C	"Yakama Nation tribal members hunt and gather roots on the Yakima Training Center (YTC) adjacent to Route Segment 1b. As previous communicated to BLM during the May 17, 2012 Preferred Route Selection Workshop, these are cultural activities, not recreational activities. The distinction needs to be made in the Final EIS."	Section 3.11.4.4 of the DEIS and 3.11.5.2 of the FEIS includes a discussion of Native American hunting and gathering activities occurring in the Project study area. Hunting is separately discussed as a recreational activity in Section 3.5 (Recreation) for the FEIS.
Yakama Nation	52-D	"There is no assessment in the DEIS as to how the project would affect hunting and root gathering that takes place within the YTC near segment 1b in either Chapter 3 or 4 of the DEIS. This assessment should be conducted and included in the Final EIS."	This section has been revised in the FEIS (Section 3.11.5.2 of the FEIS).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Yakama Nation	52-E	"Also during the May 17, 2012 workshop, a representative from the Wanapum expressed concern that YTC would require lighting on the transmission poles within route segment 1b of the project. There is no discussion of this in the DEIS. Per Chapter 4, adverse effects include "introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." The impact of the introduction of lighting to an area used for traditional activities should be addressed in the Final EIS."	While lighting structures near JBLM YTC will be required, the extent to which is unknown at this time because the Final Route has not been identified, and therefore, no FAA lighting evaluation has been conducted. The FAA requires the identification of a Final Route and detailed engineering drawings to be developed before they will review a project for potential airspace obstruction. This final placement of lighting could substantially affect the extent of visual impacts. Visual impacts to Native American Concerns are addressed in Sections 4.11.3 and 4.11.4 of the FEIS.
Yakama Nation	52-F	"To ensure protection of Yakama Nation's cultural and natural resources, I would like to request that BLM meets with our Cultural, Roads, Irrigation & Land, and Fish, Wildlife, Law & Order Committees once a Final EIS has been prepared and prior to issuing a Record of Decision."	The BLM welcomes a meeting with the entities identified by the commenter, and will engage the Yakama Nation prior to the issuance of the ROD.
USEPA	53-A	"However, the project will cross many drainages and the combination of riparian vegetation and other vegetation removal, earth moving activities and associated erosion and sediment loading could exacerbate water quality conditions in streams already on Washington State's list of impaired water bodies due to exceedances of water quality standards for temperature and other pollutants."	Required Design Features SGW-11 and SGW-12 (Section 2.3.9 of the FEIS) will be implemented to address soil compaction and sedimentation impacts.
USEPA	53-B	"Because of the project's potential water quality impacts, we recommend that BLM continue to coordinate with Washington State Department of Ecology and affected Tribes to assure that the state and tribal water quality standards will be met.....The final EIS should also include information on how BLM will be working collaboratively with Ecology to ensure compliance with Water Quality Restoration Plans, if any, that will function as BLM's share of Total Maximum Daily Loads implementation, designed to meet State and Federal water quality rules and regulations in Lower Crab Creek and the Columbia River at Priest Rapids Lake."	This section has been revised in the FEIS (Section 3.14.2 of the FEIS).
USEPA	53-C	"Since the project anticipates obtaining a National Pollutant Discharge Elimination System permit for planned construction activities expected to disturb nearly 330 acres (80 acres permanently and 250 acres temporarily), the final EIS should include updated information on the permit application process and measures to protect water quality."	This section has been revised in the FEIS (Section 3.14.3.1 of the FEIS).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USEPA	53-D	"Because of potential impacts to farmlands and subsequent loss of crops and wildlife habitat, we recommend BLM coordinate with the Natural Resources Conservation Service and/or USDA Service Center and the Farm Service Agency in assessing the project impacts to farmlands, including loss of CRP lands and determining measures to be followed to avoid and minimize any significant impacts to farmlands. The final EIS should include information about NRCS analysis and rating of the potential impacts, and what will be done to restore farmlands and compensate landowners for losses incurred due to the project."	The analysis process is covered in Section 3.4.2.6 of the DEIS and Section 3.4.2.6 of the FEIS. A final analysis cannot be completed until the Project is designed and the footprints of structures and final areas of conversion are known.
USEPA	53-E	"Since thermal modification is the primary cause of streams not supporting beneficial uses in the project are, we are concerned that vegetation removal along waterways would result in streambank scouring, erosion, poor drainage and loss of soil and wildlife habitat. Therefore, we recommend that such areas be targeted for active restoration to increase vegetation cover and improve thermal conditions in stream channels."	A Revegetation Plan will be prepared in coordination with the agencies. Required Design Features BIO-7, BIO-8, SGW-1, and SGW-11 will be implemented as part of the proposed Project to address streambank scouring, erosion, poor drainage and loss of soil and resultant potential wildlife habitat. Perennial and intermittent streams will be spanned and avoided by the proposed Project. The Pacific Power's Contractor would restore all lands disturbed during construction. See Sections 2.4.3.10 and 2.4.3.12 of the DEIS and Sections 2.3.2 and 2.3.9 of the FEIS.
USEPA	53-F	"Because of anticipated cultural resources impacts by the project, the EIS should address Executive Order 13007, distinguishing it from Section 106 of the NHPA, and discuss how BLM would avoid adversely affecting the resources. The EIS should provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites, and development of a Cultural Resource Management Plan."	This section has been revised in the FEIS (Section 4.11.1.1 of the FEIS).
USEPA	53-G	"Therefore, we recommend that the final EIS describe a monitoring program designed to assess both impacts from the project and the effectiveness of the proposed mitigation measures for the impacts. The document should also indicate how the program would use an effective feedback mechanism to assure environmental objectives would be met throughout the project lifespan."	A Reclamation, Revegetation, and Monitoring Plan identifying the reclamation stipulations will be developed and incorporated in the final POD.
Grant County Board of Commissioners	55-A	"The Department of the Interior is required to coordinate with the Grant County Board of County Commissioners on this matter pursuant to its obligation under the Federal Land Management Policy Act (FLPMA), and when making any decision under the National Environmental Policy Act (NEPA)."	Grant County is a Cooperating Agency and they have participated in the EIS process. Grant County will make a permitting decision on the proposed Project (See Chapter 6, Table 6-1).
Grant County Board of Commissioners	55-B	"Any reference to Grant County as a "cooperating agency" must be eliminated from the FEIS."	Grant County became a formal Cooperating Agency for the proposed Project in February 2015. Grant County will make a permitting decision on the proposed Project (See Chapter 6, Table 6-1).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Grant County Board of Commissioners	55-C	"All of these issues are present along the BLM's preferred route segment 3c. It is the only logical conclusion that, because the reasons listed above were enough to exclude an earlier route east of Mattawa, that route segment 3c should be removed from any further consideration given the potential impacts to agricultural uses and operations."	All Action Alternatives carried forward for analysis in the DEIS, except the No Action Alternative, have impacts on various resources, including agricultural resources. The degree and extent to which impacts on agricultural operations potentially would occur resulted in the elimination of some alternatives from further consideration. The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.
Grant County Board of Commissioners	55-D	"It is unclear how route segment 3c can generally result in greater impacts than 3b and yet somehow segment 3c is the BLM's preferred alternative."	The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. The Agency Preferred Alternative is chosen based on the consideration of all relevant resources, agency policies, and other factors. Additionally, the comprehensive range of alternatives considered for the project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.
Grant County Board of Commissioners	55-E	"Given that 3b was never a viable route to begin with, how can the BLM review the impacts of 3c against an impossible alternative and expect to reasonably decide which route results in the least environmental impact?"	As will all Action Alternatives carried forward for analysis in the DEIS, Route Segment 3b, as well as 3c, was considered feasible while satisfying the purpose and need for the proposed Project. Additionally, the comprehensive range of alternatives considered for the project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.
Grant County Board of Commissioners	55-F	"The DEIS regularly implies and sometimes states that the 3c route is merely paralleling an existing, impacted ROW, which appears to be some of the justification for this route being a part of the preferred alternative route. This supposition is incorrect given the lack of developed ROW along this route."	The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. The Agency Preferred Alternative is chosen based on the consideration of all relevant resources, agency policies, and other factors. Additionally, the comprehensive range of alternatives considered for the project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Grant County Board of Commissioners	55-G	<p>"The agricultural production that results from the Columbia Basin Project is estimated to be approximately \$1.44 billion annually. Impacts to these agricultural lands have direct impacts on the economy of this community, and those socioeconomic impacts are no less important than other environmental impacts that will result from the proposed project. The DEIS fails to adequately quantify the actual impacts to the agricultural uses in Grant County."</p>	<p>It is unclear from the comment how the DEIS is deficient in quantifying impacts to agricultural uses in the DEIS. Socioeconomic impacts are detailed in Section 4.9 of the DEIS and Section 4.9 of the FEIS. The transmission line easements may encumber the affected ROW area with land use limitations. Agricultural crops would be allowed and agricultural operations would be allowed to continue on the vast majority of farming and uses crossed by the proposed Project ROW corridor. The extent of specific economic impacts and value of crops resulting from conversion is unknown because the proposed Project has not been engineered and sited relative to these areas. Mitigation measures and required design features will be implemented for the proposed Project that will help to minimize any potential losses occurring. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.</p>
Grant County Board of Commissioners	55-H	<p>"Section 4.4.4.10 states that long term impacts will occur to agricultural lands including impacts to alfalfa, blueberry, cherry, field corn, wine grape, grass hay, green pea, potato, timothy, and wheat. It is also true that the daily operations associated with these types of crops would also be impacted by the siting of this facility along route segment 3c. These activities include but are not limited to harvesting, aerial spraying, the use of helicopters in drying orchards in the springtime, and other ancillary operational activities. As we have previously indicated, these impacts were the reason for exclusion of earlier route alternatives that were also east of Mattawa. Because these impacts are identical to the impacts to the earlier route alternatives, segment 3c should be removed from consideration."</p>	<p>All Action Alternatives carried forward for analysis in the DEIS, except the No Action Alternative, have impacts on various resources, including agricultural resources. The degree and extent to which impacts on agricultural operations potentially would occur resulted in the elimination of some alternatives from further consideration. The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.</p>
Grant County Board of Commissioners	55-I	<p>"As we have previously stated, the BLM is required to coordinate with Grant County under their obligations set forth in FLPMA. This coordination requirement is not simply a "one and done" obligation of the BLM. Rather, the BLM is required to continually coordinate with this Board (a local unit of government) throughout the process of DE IS development, and regardless of 'public comment periods', our involvement is in parity to that of the BLM, not as a subordinate."</p>	<p>Grant County became a formal Cooperating Agency for the proposed Project in February 2015. Grant County will make a permitting decision on the proposed Project (See Chapter 6, Table 6-1).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Grant County Board of Commissioners	55-J	<p>"That effort should also have included coordination when selecting the Preferred Route Alternative on May 17, 2012. At that meeting, the BLM chose not to voice any opinion on a few of the route alternatives, including the discussion relative to segments 3b and 3c. Instead, following the meeting and during the finalization of the DEIS, the BLM, at its sole discretion, decided that route 3c was the preferred alternative for the project. This was not a decision the BLM was entitled to make without coordinating with this Board."</p>	<p>The Preferred Route Selection meeting occurring on May 17, 2012 was conducted to solicit comments from the Cooperating Agencies and other participants as to their preference and rationale for preference of the Action Alternatives analyzed in the DEIS for consideration by the BLM prior to BLM's identification of an Agency Preferred Alternative. A Grant County Representative was present, participated, and expressed a preference as a representative of the county. The opinions of the Cooperating Agencies and other entities attending who expressed a preference were critical in BLM's identification of an Agency Preferred Alternative. As the lead agency and in accordance with CEQ regulations, the selection of an Agency Preferred Alternative is solely at the discretion of the BLM. In the view of the BLM, participation of a Grant County Representative at the meeting constituted coordination with Grant County.</p>
Grant County Board of Commissioners	55-K	<p>"However, in this case, the impacts to Grant County are avoidable, alternative routes exist that would eliminate any impact to the agricultural operations present on the Wahluke slope."</p>	<p>The BLM and the Cooperating Agencies carefully considers the trade-off between the various resources assessed and evaluated during the NEPA process. The Agency Preferred Alternative is chosen based on the consideration of all relevant resources, agency policies, and other factors. Additionally, the comprehensive range of alternatives considered for the project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.</p>
Grant County Board of Commissioners	55-L	<p>"Expecting agricultural practices and infrastructure to be modified to accommodate this one facility, a facility that provides no power services to this County is unreasonable."</p>	<p>Typically, structures can be placed as to avoid agricultural areas and infrastructure. During the engineering and design phase of this proposed Project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Grant County Board of Commissioners	55-M	"Further the DEIS clearly states the impacts to this portion of Grant County are generally considered high to moderate and this Board finds that to be too great of an impact to support the route identified solely by the BLM as the "preferred alternative"."	The Preferred Route Selection meeting occurring on May 17, 2012 was conducted to solicit comments from the cooperating and other participants as to their preference and rationale for preference of the Alternatives presented in the DEIS for consideration by the BLM prior to identification of an Agency Preferred Alternative. A Grant County Representative was present, participated, and expressed a preference as a representative of the county. The opinions of the cooperating agencies and other entities attending who expressed a preference were critical in the identification of an Agency Preferred Alternative. As the lead agency and in accordance with CEQ regulations, the selection of an Agency Preferred Alternative is solely at the discretion of the BLM. In the view of the BLM, participation of a Grant County representative at the meeting constituted coordination with Grant County.
DNR	56-A	"Unfortunately, the maps identifying ownership jurisdictions in your Draft EIS do not recognize State ownership of this parcel, so we did not recognize the potential impact until notified by our lessee, Tedd Wildman of Saddle Mountain Vineyards, who received a letter from Pacific Power concerning the potential impact."	This section has been revised in the FEIS. Refer to the Project maps in Appendix A of the FEIS.
DNR	56-B	"Transmission lines with their safety and reliability concerns and their associated maintenance and vegetation control activities create significant challenges and concerns when they come in proximity with orchard and vineyard management."	During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.
South Columbia Irrigation District	57-A	"The primary concerns center on the analysis of the Route Segment 3-C of the Preferred Alternative (3-C). This segment crosses private land and federal easements in the Columbia Basin Project. This comes as a surprise to SCBID, as I have not been consulted in the development of the proposed route. The Bureau of Reclamation has not consulted with SCBID on 3-C and, until recently, had not considered 3-C impacts."	Route development has occurred as a result of coordination with various agencies, including the Bureau of Reclamation who is a formal Cooperating Agency for the proposed Project, with a decision to make regarding Pacific Power's ROW application. Multiple preliminary route alternatives were identified and presented for public and agency review and comment during the scoping period. Additionally, the comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
South Columbia Irrigation District	57-B	"The powerline would cross-at least eight times-Reclamation rights-of-way containing canals, laterals, and wasteways that must be operated and maintained with equipment that may include long-reach excavators and concrete pumping equipment."	During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting. In addition, Bureau of Reclamation is a formal Cooperating Agency for the proposed Project with a decision to make regarding Pacific Power's ROW application.
South Columbia Irrigation District	57-C	"There are seven irrigation ponds that may require cleaning with long-reach excavators, draglines, or other high-reach equipment."	During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.
South Columbia Irrigation District	57-D	"There are four orchards that are or may be grown on trellis systems."	Irrigated agricultural areas were inventoried for the DEIS and are presented in Section 3.4 of the DEIS and Section 3.4 of the FEIS. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.
South Columbia Irrigation District	57-E	"There are nine pivot irrigated fields where the pivot swings most likely will be affected by the powerline placement."	Irrigated agricultural areas were inventoried for the DEIS and are presented in Section 3.4 of the DEIS and Section 3.4 of the FEIS. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.
South Columbia Irrigation District	57-F	"There are pumping plants and electrical lines (both above and below ground) located in this area that would affect tower placement."	During the engineering and design phase of this project, Pacific Power (will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.
South Columbia Irrigation District	57-G	"There are irrigation pipelines all associated with the irrigation system that will affect tower placement."	During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.
South Columbia Irrigation District	57-H	"There is partitioned land for residential or industrial development located in the route which may be valued much higher for impacts."	Impact criteria and levels are detailed in Sections 4.4.1.2 and 4.4.2 of the DEIS and Sections 4.4.1.2 and 4.4.2 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
South Columbia Irrigation District	57-I	"There are two houses that would be affected."	All residences were inventoried within one mile of Action Alternatives. See Section 3.4.4 and Table 3.4-5 in the DEIS and Section 3.4.4, Tables 3.4-9A and 3.4-9B of the FEIS.
South Columbia Irrigation District	57-J	"There is other development, present and future, which would be affected."	Comment noted.
South Columbia Irrigation District	57-K	"The report underestimates both the short- and long-term impact to the landowners because the entirety of the farming and irrigation activity along this route was not well understood. It is difficult to analyze specific impacts without having the exact construction specifications and layout. The acreage impacts stated on page 4-96 cannot be accurate. Table 4.A-5 does not match up with the text."	Following the publication of the FEIS, the authorizing entities will determine the final Alternative in their decision documents. At that point, Pacific Power can begin engineering and design of the selected alternative. It is unclear from the comment as to which Table does not match the document text.
South Columbia Irrigation District	57-L	"The visual impacts (Appendix C) to landowners who must live, work, and operate directly under the powerlines were underestimated or not considered for 3-C parallel to Road N. It is extremely high impact."	High visual impacts were identified along area near residences located along N Road. A discussion of impact criteria is detailed in Section 4.8.1 of the DEIS and Section 4.8.2 of the FEIS.
South Columbia Irrigation District	57-M	"The report does not adequately address changes to cropping patterns that will occur in the future."	It is unclear from the comment as to where in the document and what geographical area is being referred to. The commenter does not provide additional or new information that can be incorporated into the FEIS. Impacts to agriculture (crops) are addressed in Sections 4.4.3 and 4.4.4 of the FEIS.
South Columbia Irrigation District	57-N	The report does not address the disruption to aerial spraying that may occur with the powerline"	The BLM and the Cooperating Agencies have carefully considered the effects of the project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.
South Columbia Irrigation District	57-O	"and the cumulative impacts that an additional powerline in the area has on farming operations."	As stated in the DEIS, the cumulative effects occurring as a result of past, present and reasonable foreseeable future projects on agriculture would be attributable primarily to other projects, and not the transmission line, please refer to Section 4.17.6 of the FEIS.
South Columbia Irrigation District	57-P	"Because of the high impacts to farming, SCBID does not approve of the 3-C route and recommends a different route be chosen."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
DNR-NHP	58-A	"There are two species occurrences included in Table 3.2-5 that are not in the Washington Natural Heritage Program database: hedgehog cactus ( <i>Pediocactus simpsonii</i> var. <i>robustior</i> ) in segment 1b and Nuttall's sandwort ( <i>Minuartia nuttallii</i> ssp. <i>fragilis</i> ), also in segment 1b. We would like to receive information on each of these occurrences so that we can add them to our database, given that we have the responsibility for maintaining a statewide database of such information."	BLM will provide the special status plant occurrence information to DNR-NHP.
DNR-NHP	58-B	"Under BIO-4 (page 2-46), we would like to be consulted in the event that a determination is made that any special status plants require relocation."	BLM will contact DNR-NHP in the event any special status plant species require relocation due to the construction of the proposed Project.
DNR-NHP	58-C	"Under BIO-8 (page 2-47), we would like to receive information about any newly discovered populations of special-status plant species"	BLM will provide the special status plant occurrence information to DNR-NHP.
DNR-NHP	58-D	"We would like the opportunity to be consulted regarding how best to avoid or minimize impacts to snakes during the implementation of this project. We also recommend that the appropriate project design features identified in Chapter 2 (2.5.2 Biological Resources) be applied to the striped whipsnake locations and its habitat."	RDFs identified in Chapter 2 of the FEIS will be applied to striped whipsnake. DNR, as a Cooperating Agency, will have the opportunity to provide input on how best to avoid impacts to striped whipsnake.
Grant County PUD	59-A	"Grant PUD supports the Agency Preferred Route Segment 3C and Alternative D through Grant County."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.
Grant County PUD	59-B	"We also note that if transmission structures are to be placed within the Project boundary, additional review and/or approval by the Federal Energy Regulatory Commission (FERC) may be required."	The Agency Preferred Alternative (NRR Alternative – Overhead Design Option) identified in the FEIS is north of both the Priest Rapids Hydroelectric Project and Wanapum Dam. As such, no transmission structures will be placed within these project boundaries.
Grant County PUD	59-C	"This route segment avoids crossing the planned expansion area of the Burkett Lake Recreation Area, but the proximity of the transmission line may impact the experience of some recreation users. The line route may impact the parking area and vault toilet proposed on the Bureau of Reclamation (BOR) property. Grant PUD requests that BLM allow opportunities to review and coordinate the placement of structures and spans during engineering design."	The FEIS Agency Preferred Alternative would not be located within the Burkett Lake Recreation Area, so direct impacts on the proposed parking area and entrance would not occur. During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting. User experience visual impacts resulting from the Agency Preferred Alternative is detailed in Section 4.8.5.10 of the DEIS and Section 4.8.5.1 of the FEIS.
Grant County PUD	59-D	"Visual impacts may occur at many recreation sites owned and managed by Grant PUD."	Comment noted. User experience visual impacts resulting from the Agency Preferred Alternative is detailed in Section 4.8.5.10 of the DEIS and Section 4.8.5.1 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Grant County PUD	59-E	"Grant PUD has a reservation for erosion and flowage easement on portions of the railroad ROW located within the Project boundary. If this Alternative were chosen, permission from Grant PUD and review/approval by FERC would be required to occupy the ROW."	Comment noted.
Grant County PUD	59-F	"Route Segment 3B could impact the Wanapum Indian Village located southwest of the dam in Sections 2 & 3, Township 13, Range 23, E.W.M., Yakima County. There are approximately 30 homes in this area. Maintenance activities in the vicinity on the Wanapum Indian Village may require advance notification to residents."	Comment noted.
WDFW	60-A	"Whether it is the presence/ behavior of predatory birds, the perch structures, or some combination of the two, overhead structures are a significant concern for grouse conservation and recovery. Habitat loss is also a significant concern. It compounds the lost habitat utilization and mortality that is associated with placement of these structures."	Impacts on Sage-Grouse, including those occurring as a result of perching, are detailed in Section 4.3.3.3 of the DEIS and Section 4.3.3.4 of the FEIS.
WDFW	60-B	"The Vantage to Pomona line is within a PAC. The Vantage to Pomona Heights project as proposed is in conflict with COT guidance."	Additional resource protection guidance and recommendations have evolved over the course of this EIS and new information that has become available during the EIS process has been incorporated into the EIS analysis and mitigation development for Greater Sage-Grouse. Additional text has been added to the FEIS. Please see Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS for more information on how the proposed Project is consistent with the standard mitigation hierarchy.
WDFW	60-C	"The capacity of the landscape to support (sage brush steppe) non-obligate or generalist species will be reduced by this proposal."	In Chapter 4-3 of the FEIS, impacts, including habitat loss, are discussed for generalist as well as sagebrush-obligate species.
WDFW	60-D	"The proposed transmission line project bisects the only remaining Striped Whipsnake occurrences known in Washington and also bisects habitat that was historically occupied by the Striped Whipsnake. In addition to the footprint impacts of the poles/towers and roads, the perching habitat that is introduced will make these snakes vulnerable to predation and impact their lizard prey base. Weed infestations that change the character of the habitat impairs the hunting ability of the snake. Traffic on service roads associated with the transmission line are a mortality source for the snake. Rocky areas often selected for tower placement are key areas for Striped Whipsnakes."	These impacts are discussed in the FEIS in Sections 4.3.3.1, 4.3.3.2, and 4.3.3.5.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
WDFW	60-E	"Habitat for species such as white and black-tailed jackrabbit is functionally reduced and impaired by the presence of transmission lines. Their habitat is reduced and fragmented by transmission lines."	In Chapter 4-3 of the FEIS, impacts are discussed, including habitat loss and fragmentation
WDFW	60-F	"Burying the transmission line or critical segments of the line in discreet and strategic locations was not analyzed in any of the alternatives even though it has the advantage of avoiding or mitigating identified impacts to sage-grouse and other fish and wildlife species. Additionally, all alternative transmission lines routes share nearly an identical alignment on the western segments of the proposed transmission line. If each alternative contains nearly identical alignments for a significant portion of the proposed route, a reasonable range of alternatives has not been presented."	The SDEIS analyzed two discrete segments of the NNR Alternative with Underground Design Options, Route Segments NNR-4u and NNR-6u. Please see the SDEIS sections 3.3 and 4.4 and FEIS sections 3.3 and 4.3.
WDFW	60-G	"The proposed alternatives in the Vantage to Pomona Heights Transmission Line do not avoid or mitigate adverse impacts to sage-grouse identified in these studies. The findings of the USFWS Greater sage-grouse COT report are not reflected in the alternatives. In consideration of the fact that the local sage-grouse population is in danger of disappearing, it is reasonable to expect that the transmission line project should be comprised of alternatives that reflect a cautious set of actions that clearly avoid adverse impacts. The Vantage to Pomona Heights Transmission Line DEIS fails to include a reasonable range of alternatives."	Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received and present a reasonable range of alternatives. Action Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Additional resource protection guidance and recommendations have evolved over the course of this EIS and new information that has become available during the EIS process has been incorporated into the EIS analysis and mitigation development for Greater Sage-Grouse. Additional text has been added to the FEIS. Please see Sections 3.3, 4.3, Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS for more information on how the proposed Project is consistent with the standard mitigation hierarchy.
WDFW	60-H	"However, no mitigation alternatives are provided for the permanent footprint of the project proposal, the loss of ecological connectivity of shrub-steppe, or the identified impacts to sage-grouse."	Additional text has been added to the FEIS. Please see Sections 3.3, 4.3, Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS.
WDFW	60-I	"The distance from project of the proposed Saddle Mountain Wind Farm is not a compelling reason to ignore the cumulative impacts of that proposal that this new line makes possible. Thus, that project should be included in the environmental and cumulative effects review as that project would appear to be a connected action, infeasible without this project proposal."	The Saddle Mountain Wind Farm was included in the Cumulative Effects analysis; please see Section 4.17.5 of the DEIS and Section 4.17.5 of the FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
WDFW	60-J	<p>"The applicant has selected a preferred route and has surveyed that route to ascertain use by sage grouse. Since few grouse were observed on this route, it is proffered that this route would have negligible impacts to the sage grouse. If a healthy, well distributed sage grouse population existed, this logic may be more relevant. However, we are considering adverse impacts to the last known sage grouse population in the southern portion of the Washington State. This is where the population has retracted to and is the last place where it exists. This project proposal will degrade the remaining core habitat and reduce opportunities for ecological connectivity to other remaining habitat. The remaining density of an imperiled population is a poor surrogate for habitat importance. By this standard, the location of a nearly extinct population would indicate an ideal route since few or no individuals would likely be encountered during surveys. The role that this habitat plays in population maintenance and recovery efforts is undervalued. Additionally, if adjacent habitat is burned (which is an entirely reasonable scenario), this habitat along the route may form the core habit for the remaining birds. This DEIS performed a static analysis in a landscape subject to large scale disturbance events, (primarily fire)."</p>	<p>The Sage-Grouse Analysis was expanded in the SDEIS and FEIS. To generate a clearer picture of relative density of use by the YTC Sage-Grouse population, a fixed kernel density analysis was conducted using telemetry data. The methodology is explained in detail in Appendix B-5 Sage-grouse Technical Report included in the SDEIS and FEIS.</p>
WDFW	60-K	<p>"Pacific Power's existing transmission line across YTC is not meaningfully included in the analysis despite the inextricable connection it has to the new proposed line. The inadequacy of the existing line is, in fact, the justification for the need for and entirely new transmission line. The capabilities of the existing line to handle a rerouted electrical load have been deemed insufficient. The habitat impacts of that existing line have yet to be addressed. The analysis partitions the new proposal from the old line forms the justification for the new line. This piecemeal treatment frustrates analysis and artificially excludes elements integral to development of alternatives and potential mitigation packages. If this new proposed line is to provide reliability or redundancy in case the existing line experiences a malfunction or is damaged, a new line could be built to a different specification to meet a temporary routing need. Efforts at remedial measures to modify the existing line across the YTC installation have not been sufficiently explored."</p>	<p>Pacific Power's existing Pomona-Wanapum 230kV transmission line has been accounted for in Chapter 3 as it is part of the existing condition as well as in the Cumulative Effects Section of the FEIS. Please see also Sections 3.3, 4.3, Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS.</p>
WDFW	60-L	<p>"Consideration of the BPA Moxee-Midway Transmission Line is also missing from the DEIS."</p>	<p>BPA's existing Midway-Moxee transmission line has been included in Chapter 3 of both the SDEIS and FEIS as part of the existing condition as well as in the Cumulative Effects Section 4.17 of the FEIS.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
WDFW	60-M	"Combined figures for both suitable and marginal sage-grouse habitat along that preferred route come to 42.4 miles. This information is provided in Table 4.3-10 on page 4-83 of the DEIS. Based on current best available science regarding sage-grouse behavior associated with transmission lines and associated towers, it is reasonable to assert that no leks will ever be established beneath or adjacent to the new proposed transmission line along those 42.4 miles."	Comment noted.
WDFW	60-N	"The significant increase in perches and nesting habitat for grouse predators appears to be another impact that isn't avoided, mitigated or addressed."	Impacts to Sage-Grouse from perching and nesting predators are discussed in the SDEIS and FEIS Section 4.3. RDF's to reduce impacts to Sage-Grouse from avian predators are also discussed in Section 4.3. Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures is included in the FEIS detailing how the proposed Project is consistent with the standard mitigation hierarchy to avoid, minimize and reduce/rectify impacts.
WDFW	60-O	"A range of road widths is provided and disturbance area calculations are made based on those width assumptions. Results of the calculations are provided on Table 2-5 on page 2027 of the DEIS. In the text that precedes the table, the disturbance widths range from 14 feet to 24 feet with a 5 foot disturbance zone on either side of the running surface. The calculations on the table however utilize the narrowest road width to arrive at the disturbance footprint area figure."	Detailed design of the entire proposed Project for all Action Alternatives for inclusion in the EIS is not required and is not practical. As described in Chapter 2 of the FEIS, for the purposes of the model, it was assumed that permanent new access roads would be graded to travel service width of 14 feet, including back slopes and side cast material. For the purposes of calculating estimated impacts created as a result of the proposed Project and its' alternatives, eight levels of access (Levels 0 through 7) were developed (See Section 2.2.3.2 of the FEIS). These Access Levels were based on the development standards detailed above, and were numerically arranged based on the anticipated ground disturbance expected, with the lowest level (Level 0) having the lowest ground disturbance per mile of transmission line and the highest level (Level 7) having the most. Level 0 was assigned in areas where no ground disturbance is anticipated due to the presence of existing disturbance (e.g., agricultural areas), the crossing of surface water, or severe slopes where no road construction would occur. The access levels were developed based on the presence of existing roads and their current conditions, and the anticipated road construction based on slope and vegetation cover. Access Levels were assigned for each 0.1 mile increment along the proposed Project's Action Alternatives.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
WDFW	60-P	"Additionally, the habitat impacts are viewed as short-term, temporary, and long-term. To term some of these impacts as temporary or short-term is problematic in light of the challenges that cheatgrass and other aggressive exotics present with disturbed soils in an arid environment. This proposes an outcome that is difficult to accomplish. Even if correct techniques are utilized, annual precipitation amounts can result in a failed effort. A thorough treatment of planned re-vegetation methods is needed."	Impacts in sagebrush dominated habitats were considered as a long-term impact to wildlife for the SDEIS and FEIS analysis (Section 4.3 of the FEIS). A detailed Reclamation, Revegetation, and Monitoring Plan will be included in the Plan of Development (POD). In addition, a Noxious Weed and Invasive Plant Management Plan will be developed in consultation with land management agencies and local weed control districts and would be incorporated into the final POD.
WDFW	60-Q	"In their project notice, BPA asserts that their rebuild is separate and independent of other utility projects currently being proposed in the area. While consideration of the Vantage to Pomona Heights project may predate the Moxee-Midway rebuild, the two projects combine to cumulatively impact a vast area. Thus, the cumulative impacts of these two proposed projects must be assessed. To partition the environmental review of these two proposals and ignore the spatial, temporal and habitat relationships frustrates analysis and masks the cumulative impacts or cumulative benefits that could be realized in a comprehensive analysis."	The existing Midway-Moxee transmission line has been included in Chapter 3 of both the SDEIS and FEIS as part of the existing condition as well as in the Cumulative Effects Section 4.17 of the FEIS.
WDFW	60-R	"The failure to avoid or mitigate for the permanent adverse impacts to shrub-steppe habitat, obligate species and the imperiled sage-grouse is troubling. The analysis contained within the DEIS ought to reflect the results of these studies and their findings ought to influence alternatives and actions."	Impacts to Sage-Grouse and shrub-steppe birds are discussed in the SDEIS and FEIS Section 4.3. Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures is included in the FEIS detailing how the proposed Project is consistent with the standard mitigation hierarchy to avoid, minimize and reduce/rectify impacts. In addition, a Migratory Bird Conservation Plan has been developed and is included as Appendix B-8 of the FEIS.
WDFW	60-S	"The habitat threat represented by fire has not been adequately assessed. The transmission line alignment will cross a landscape that is highly susceptible to fire. The frequency and magnitude of these fires in this landscape is a threat to shrub-steppe obligates as well as other wildlife. The smaller the wildlife population, the greater the impact a fire would represent. The smaller the acreage of remaining habitat, the greater the threat a fire would pose to the remaining critical habitat. Fire impacts in shrub-steppe habitat can persist for decades. Populations of imperiled species are at high risk of extinction as habitat slowly recovers. The presence of the transmission line will increase human activity in this landscape and will introduce more sources of ignition, threatening adjacent areas of shrub-steppe and grouse habitat. The presence of the transmission line in a fire altered landscape significantly reduces the potential of the habitat to support sage-grouse and other shrub-obligate species."	The threat of wildland fire ignition is discussed in the DEIS, SDEIS and FEIS in Sections 3.12 and 4.12. Additional information regarding fire impacts to vegetation and wildlife habitat (including noxious weeds and invasive species introduction) are discussed in the SDEIS and FEIS Sections 3.2, 3.3, 4.2 and 4.3.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
WDFW	60-T	"As presented, the impacts of this proposed action to the sage-grouse as well as other shrub-steppe obligate species would be irreversible. This last remaining habitat and opportunity for ecological connectivity is irreplaceable with respect to shrub-steppe obligates. The life or duration of the project, the persistent nature of the impacts and scale of the impacts are a significant irreversible and irretrievable commitment of resources. Alternatives that would avoid or mitigate permanent adverse impacts have not been proposed by the applicant."	Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received and present a reasonable range of alternatives. Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Impacts to Sage-Grouse and shrub-steppe obligate birds are discussed in the SDEIS and FEIS Section 4.3. Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures is included in the FEIS detailing how the proposed Project is consistent with the standard mitigation hierarchy to avoid, minimize and reduce/rectify impacts. In addition, a Migratory Bird Conservation Plan has been developed and is included as Appendix B-8 of the FEIS.
Columbia Basin Development League	61-A	"We urge great caution when analyzing the level of impact (financial and otherwise) to producing lands especially when considering the following issues: • introduction and spread of noxious weeds"	A Noxious Weed and Invasive Plant Management Plan will be developed in consultation with land management agencies and local weed control districts and would be incorporated into the final POD.
Columbia Basin Development League	61-B	"use of helicopters for drying and aerial spraying"	The BLM and the Cooperating Agencies have carefully considered the effects of the project on aerial applicators. These impacts are discussed in Section 4.4.4 of the DEIS and Section 4.4.4 of the FEIS.
Columbia Basin Development League	61-C	"farm workers and equipment from inducted current"	Potential impacts on farm workers and equipment from induced current is detailed in Section 4.16.1.1 of the DEIS and Section 4.16.1.1 of the FEIS.
Columbia Basin Development League	61-D	"GPS, cell phones, and other electronic farm equipment including center-pivot and other irrigation equipment"	Potential impacts resulting from GPS, cell phones, and other electronic farm equipment is detailed in Section 4.16.8 of the DEIS and FEIS.
Columbia Basin Development League	61-E	"property values"	The potential effects on property values of the proposed Project is covered in Section 4.9.8 of the DEIS and Section 4.9.8 of the FEIS.
Columbia Basin Development League	61-F	"minority communities"	Environmental Justice and minority community impacts are detailed in Section 4.10.2.1 of the DEIS and the FEIS.
Columbia Basin Development League	61-G	"aesthetics of private property"	Potential impacts on aesthetics are detailed in Section 4.8 of the DEIS and the FEIS.
Wanapum Indian Community	62-A	"Based on our review of the DEIS's analysis of eight alternatives, Wanapum concurs on the selection of the Preferred Alternative, as displayed on Figure 2-7 in the DEIS."	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Pacific Power	63-A	<p>"As a result of the public comments on the DEIS and specifically the Agency Preferred Alternative, Pacific Power has again reviewed reliability standards established by the Western Energy Coordinating Council (WECC) and North American Electric Reliability Corporation (NERC), through NERC Planning Standards (WSCC-S2). Recently, the standards have been revised and are less restrictive than those that were in place when a previous alternative, through the Yakima Training Center on its north side, were eliminated from detailed analysis in the DEIS due to WECC separation criteria from existing Pomona-Wanapum 230 kV transmission line."</p>	<p>The SDEIS was developed, in part, due to the revised regulatory requirements regarding transmission line separation (See Section 1.1.1 of the FEIS). A new route alternative crossing the north portion of the JBLM YTC is detailed in the SDEIS. This new alternative (the New Northern Route Alternative; NNR Alternative) was added to the range of Action Alternatives considered. Please see Chapter 2 of the SDEIS for a description of the NNR Alternative. Additionally, the range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS. The NNR Alternative has been selected as the Agency Preferred Alternative and has been identified as the Environmentally Preferred Alternative in the FEIS.</p>

**Table F1-2 Response to Non-Substantive Comments Received on Draft EIS**

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Jansen, Vicky	10-A	"I have no issues with the proposed line as long as it is not closer to my existing Airport, nor higher than the existing lines (marked with balls) as they relate to the extended centerline west of my Airport. Also, Zirkle Fruit Co. transferred an easement to me, a 60' radius on the SE corner of Section 27 and I would not want poles or guy wires to interfere with that area."	Comment noted.
Alton, Larry & Zongqi	11-A	"I was very disappointed to see that the power line routes run right along our property line through this residential area. There seems to be a minor jog in the lines that routes the lines right thru Yakima Ranches properties. I understand you are making adjustments to this route, possibly going thru the firing center which would avoid this area. I believe this would be a much better environmental and esthetic solution."	Comment noted.
Alton, Larry & Zongqi	13-A	"I was very disappointed to see that the power line routes run right along our property line through this residential area. There seems to be a minor jog in the lines that routes the lines right thru the Yakima Ranches properties. I understand they are considering making adjustments to this route, possibly going thru the firing center which would avoid this area. I believe this would be a much better environmental and aesthetic solution. This property was purchased by my parents many years ago for family use. It was named after my mother "Violet Acres". She passed away a few weeks ago at 97 years old. The family will be very upset if a power line is routed along the property destroying the aesthetics, environment and value of this inheritance. Fortunately my mother did not have to witness such a monstrosity."	Comment noted.
Alton, Larry & Zongqi	15-A	"Confirming the voice mail that I left you today, I need your mailing list for the power line project and the attendance list for the recent public meetings on this project. Please include any email addresses or phone numbers that you have."	Comment noted.
Alton, Larry	16-A	"You need to schedule another open season for comments on the subject power line because your undated letter recieved 1/11/13 is not clear about the real email address for comments and emails addressed to the apparent address are returned as undelivered."	Comment noted.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Christensen, Neil	24-F	<p>"There are already 4 major power transmission lines traversing the Mattawa farming area. They run approximately 3 miles apart from each other. This new proposed route would run in between the 2 innermost lines (one of which is composed of a set of 3 lines running 3 towers wide through the land). This would create a situation where we will have major power transmission lines running less than 1.5 miles apart from each other. Another transmission line in such close proximity would truly mar the landscape."</p>	Comment noted.
Klinge, John	37-A	<p>"First, to review the reasons for this new line. The present 230 kV line from Midway to Union Gap has a summer load rating of 340MVA. The present Wanapum to Pomona Heights 230kV line has a summer rating on 400MVA. The 115kV line from BPA's Moxee Substation into the Yakima area load has a summer load limit of 115MVA. This totals 855MVA, more than enough to serve the nearly 550MVA ratings of the neighborhood substations IF nothing goes wrong or needs servicing. Those substations are very well loaded when temperatures exceed 100°F (some are so loaded that the cooling fans must be locked on all summer long to reduce over heating episodes). Taking either 230kV line out of service on a hot summer's day when air conditioning loads are greatest may require that some customers be without electricity when they are hottest under the collar. Clearly the North American Electric Reliability Corporation standards are backed up by local needs. Second, some basic electricity. Two lines operating in parallel of the same material and size are most efficient when the load is evenly split between the two, which is accomplished by being the same length (as can be demonstrated by the requirements of the National Electrical Code section 310-4). These two lines between Pomona Heights and Vantage operating in parallel will not be of the same length, but will be of the same material and conductor size. The longer one will carry less power -- the imbalance being in direct relationship to the differences in length -- the less difference in length, the less the imbalance. All eight of options are of greater line miles than the present Wanapum to Pomona Heights 230kV line. Minimizing the length of the new line will help keep operational problems to a mild roar. [Two lines operating in parallel, one twice the length of the other -- the shorter will carry twice the power of the longer.] 2 Third, geographic diversity. One of the standards that the North American Electric Reliability Corporation incorporates into its regulations is distance between lines that are to provide reliability of service if one is taken out of service because of a natural or man-generated incident. By having transmission lines in separate corridors, an adverse incident on one line is less likely to spread to a line in a separate corridor. For example: a crop dusting airplane hitting a line in a corridor may also hit another line in the same corridor but will not hit a line in a corridor a mile away. The Agency Preferred Route includes segment 2C</p>	Comment noted. The alternative preference has been considered by the BLM and the Cooperating Agencies.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
		<p>which has the new Vantage to Pomona Heights cross over (twice) and use the same corridor as the Midway – Moxee and Union Gap – Midway lines. This 9 miles of common corridor defeats the basic purpose of constructing the new line. If an incident were to occur in this 9 mile section of corridor, all three lines could be affected resulting in the Yakima area system having to have a forced outage (people without power) so that the Wanapum – Pomona Heights line not be overloaded. Alternative 2B provides for corridor separation of at least one mile throughout its length, thus meets NERC’s standards. The Agency Preferred Route also includes segment 3C, which has 7 miles of corridor in common with the Hanford – Vantage line. It crosses high voltage transmission lines 8 times as well as several near the Vantage substation. Alternative 3B corridor is separate from all other transmission corridors throughout most of its length, the exception is at its Columbia River crossing to the Vantage substation segment. It crosses no other transmission lines except at the Vantage substation. Fourth, Security. The Agency Preferred Route segment 3C is located in an area with considerable public access, opportunities for industrial or military sabotage abound; entailing Pacific Power to report more incidents under NERC’s standard CIP-001-2a. By having 8 remote locations where transmission lines cross, opportunities for industrial or military sabotage are built into the routing. With the transmission line being located adjacent to high speed through roadways there is much more opportunity for traffic accidents to take the line out of service and generating considerable public endangerment. Alternative 3B has very limited access to the general public and close proximity to military operations greatly reducing the exposure to military and industrial sabotage. The roadway near the northern section of Alternative 3B is a dead end road with very limited traffic.”</p>	
Yakama Nation	50-NA	<p>“Please see Yakama Nation’s comments attached regarding the Vantage to Pomona Heights Draft EIS. The original will be placed in the mail to Ms. Coates-Markle today.”</p>	Comment noted.
DNR-NHP	51-NA	<p>“It is my understanding that today is the last day to submit comments on DEIS for the abovementioned project. I am writing this email to request an extension of a couple of days. I have had staff reviewing the project, but we will not be able to finalize our comments and submit them by the end of today. If it is not possible to get an extension, please let me know and I will try to pull together what I can.”</p>	Comment noted.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Office of Congressman Dave Reichert	54-A	"Thank you for passing on the information about Pacific Power preparing to construct a power transmission line from Grant County to Selah Washington. I have read over you provided letter with great interest and discussed your case with my colleagues. At this point it seems that this situation is a negotiation between two parties and is outside of this office's jurisdiction. It would be inappropriate to interject this office in the process. If the situation changes perhaps there may be an opportunity for us to be more involved. I suggest you reach out to your state and local representatives to see if they are able to provide any further assistance."	Comment noted.

**Table F2-1 Response to Substantive Comments Received on Supplemental Draft EIS**

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Eaton, Jack W.	71-A	'This part here where they come across the military on the existing line, we're not opposed to that, but I was concerned about this loop that goes way up the hill around because that comes down through our property for an additional three miles. Well, it must be close to three miles. It goes clear up to the top of the Manastash Ridge where they're coming across. But the military owns on the north side of this ridge that runs -- that they're coming around. There's a road that comes in by the interchange that would make -- if this line had to be buried out there, I don't know why it would have to be buried to go up around here to come out for the interchange. It's just an old road that they used to haul water across through there. Bentley Kern, it used to be their property, and he hauled water down over it. It's kind of a canyon, and hauling there. When you get the military interchange, there's a staging area or a gravel pit and all that spreads out wider than the freeway, and just south of that the line gets back over to the existing I-82 fence. So it looks like they could come over the freeway with possibly an overhead and not have to reach so far across that interchange area. And then come down and meet the -- come along the highway along I-82 and meet the line that is already coming across the road here, the one that comes onto our property. And I don't know why they should have to bury that new line and not bury the old one...'	<p>During the engineering and design phase of this project, Pacific Power will work with private land owners and agencies to spot structures and design the structure locations and routing to minimize impacts to landowners and resources through micro-siting.</p> <p>The existing Pomona-Wanapum 230kV transmission line has been accounted for in Chapter 3 as it is part of the existing condition as well as in the Cumulative Effects Section (4.17) of the FEIS. Additional measures related to the existing Pomona-Wanapum 230kV transmission line are also presented as mitigation for certain resources (Section 2.3 of the FEIS). Burying the proposed transmission line is a design option for the NNR Alternative analyzed in the SDEIS. This analysis was carried forward and considered in the FEIS. The comprehensive range of alternatives considered for the proposed Project is included in Section 2.4 of the FEIS and a comparison of those alternatives in Section 2.6 of the FEIS.</p>
Albin, Michael, Cheryl, and Richard	77-A	'I oppose the construction of the proposed power lines... 1) they are being constructed on a private road that is maintained by the property owners of Sage Trail Road. It is not county maintained. This has been mentioned several times and ignored. Where is documentation that access has been granted?...	Sage Trail Road was identified as a private road in the FEIS (Section 4.7.4). Pacific Power will purchase easements through negotiations with private landowners.
Albin, Michael, Cheryl, and Richard	77-B	'...2) Bridge over canal was built and rebuilt and maintained by the property owners of Sage Trail Road. Who was/has permission to repeated use of heavy equipment over the bridge and who will do any repairs?...	<p>Private land use will be negotiated between Pacific Power and the private landowner(s).</p> <p>Pacific Power will work with the land owners (federal, state, county, private) to return lands to pre-disturbance conditions. Required design features (RDFs) will be employed as described in Section 2.3.3 (LU-1) of the FEIS that includes replacement or repair of existing land improvements that are damaged or destroyed during construction.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Albin, Michael, Cheryl, and Richard	77-C	'...3) Proposed power lines cross over my property. According to paperwork attached to this document, I have to wait until final approval "before" an offer on the property will be obtained from PP&L. Why? 4) We have not been duly informed of meetings, only two letters and one generic radio announcement of "there is a meeting" but no time, date, or place stated. 5) Previous letters have gone unanswered....'	<p>BLM has conducted public meetings, open houses, hosted a website, published newspaper ads, aired radio ads, and completed numerous mailings for public scoping, and notification of the availability of the DEIS and SDEIS.</p> <p>Pacific Power will purchase easements through negotiations with private landowners.</p>
Albin, Michael, Cheryl, and Richard	77-D	'6) Route is unclear. Need to know exact location of the poles. Have only been told it's on the north side of the road. Current poles go through my property, not on the edge. Current poles seem to have been set for ease of PPL, by next to or on the actual road. Why is route being diverted in the middle of the valley? All I have been told (at last meeting) is that it is cheaper. If so, why is it turned and twisted to miss other landowners, except here where it obstructs our views and can cause a decrease in property value. At last meeting was told that would have no affect on property values, which many are "view" properties. 8) We had a pole last summer which sits at the end of our driveway that was damaged. When crews repaired pole, they left my driveway tore up and left. No repairs to damage, which I had to fix myself. Am concerned damage that will/may be done during construction will also go unattended...'	<p>As described in Section 2.2 of the SDEIS, Route Segment 1a presented in the DEIS was modified to accommodate a single affected landowner on the route segment's west end (becoming NNR-1). After the publication of the SDEIS, a landowner meeting was held by Pacific Power for affected landowners located on Sage Trail Road (see Section 5.3.4) to provide a forum for landowners to communicate concerns and discuss the design, construction and maintenance of the Project. During the meeting, additional modifications to Route Segment 1a/NNR-1 were proposed by the affected landowners. As a result, the western-most portion of Route Segment 1a/NNR-1 was modified to avoid Sage Trail Road and routed to the south of the residences fronting Sage Trail Road along an approximately 0.75-mile long section located directly east of the Pomona Substation. This modification has been incorporated into the analysis of all Action Alternatives presented in this FEIS.</p> <p>During the engineering and design phase of this project, Pacific Power will work with private land owners to spot structures and design the structure locations and routing to minimize impacts to landowners and resources through micro-siting.</p> <p>Pacific Power will work with the land owners (federal, state, county, private) to return lands to pre-disturbance conditions. Required design features (RDFs) will be employed as described in Section 2.3.3 (LU-1) of the FEIS that includes replacement or repair of existing land improvements that are damaged or destroyed during construction.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Albin, Michael, Cheryl, and Richard	77-E	'...10) Representatives at the meeting haven't viewed the proposed area in person. They are only going off photos, so there was no real understanding of where the property owners concerns are coming from. 11) Why are obvious established right-of-ways not being utilized?...	<p>On June 24, 2015 BLM, WSDOT, and Yakima County attended the Pacific Power hosted meeting with Sage Trail Road residents that expressed concern with the proposed Project's location along Sage Trail Road during scoping, public meetings and comments submitted on the DEIS and SDEIS. Pacific Power and the neighborhood group will continue to work together to come to an agreement on Pacific Power's current and future use of their private road and local bridge. In addition, Pacific Power and the landowners developed a modification/adjustment of the line's alignment, Route Segment 1a/NNR-1. This route adjustment has been carried forward into the FEIS (See Section 1.13.1 of the FEIS).</p> <p>The proposed routing and siting in the FEIS has utilized several existing ROW's or utility corridors as an attempt to minimize impacts. Examples of existing ROW's and utility corridor proposed for use includes the existing ROW along Sage-Trail Road and the existing Pomona-Wanapum 230kV transmission line, as well as others.</p>
Malone, Christy	81-A	'...Sage Trail Road is a private road maintained by individual homeowners, not a homeowners association or by Yakima County. The single lane bridge that crosses the Selah Moxee Canal needs replacement the beams are very old and cracking which is causing the cover on top of the bridge to erode as the support is weakened below it. The equipment and trucks crossing our bridge are multi-axle vehicles of much greater weight than the structure was built to support for a continued period of time. Our road is gravel and easily rutted. Heavy vehicles will only increase the movement of the gravel off the road and the washboard effect that results. This is an unfair burden to place on homeowners whose only means of maintaining their road and bridge is an annual garage sale that might net \$1000 in a good year...'	<p>During the engineering and design phase of this project, Pacific Power will work with private land owners to spot structures, design the structure locations and route to minimize impacts to landowners and resources through micro-siting.</p> <p>Pacific Power will work with the land owners (federal, state, county, private) to return lands to pre-disturbance conditions. Required design features (RDFs) will be employed as described in Section 2.3.3 (LU-1) of the FEIS that includes replacement or repair of existing land improvements that are damaged or destroyed during construction.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Malone, Christy	81-B	<p>'I am writing this letter in opposition to a change in the route of the New Northern Route proposed by Pacific Power, as well as to seek mitigation for the impacts placed on our road by same...With regard to the line placement, we were told the lines would run parallel to the existing 230 volt line that runs along the ridge from the Pomona Heights substation to Terrace Heights. We were also told this additional power was to supply growing need in Moxee Now we are told the lines will drop down and run along Sage Trail Road and cut across the Yakima Training Center. Worse the place they propose to drop the lines off the ridge cuts right in front of 6 peoples homes, when a route placed to drop down from the ridge and cut across Shotgun Road would impact nobody. I worked for a county planning department in Nevada, never have I heard of deciding your route and placing the equipment in advance of procuring Rights of Way and proper hearings to address homeowners concerns. As mentioned I received no paperwork or notice of any kind pertaining to this latest action. One of my neighbors called to ask if I was writing a letter about this latest proposal (NNR) last week when I was out of town, which was the first I had heard of it...'</p>	<p>On June 24, 2015 BLM, WSDOT, and Yakima County attended the Pacific Power hosted meeting with Sage Trail Road residents that expressed concern with the proposed Project's location along Sage Trail Road during scoping, public meetings and comments submitted on the DEIS and SDEIS. Pacific Power and the neighborhood group will continue to work together to come to an agreement on Pacific Power's current and future use of their private road and local bridge. In addition, Pacific Power and the landowners developed a modification/adjustment of the line's alignment, Route Segment 1a/NNR-1. This route adjustment has been carried forward into the FEIS (See Section 1.13.1 of the FEIS).</p> <p>BLM has conducted public meetings, open houses, hosted a website, published newspaper ads, aired radio ads, and completed numerous mailings for public scoping, and notification of the availability of the DEIS and SDEIS.</p> <p>Pacific Power will work with each land owner to minimize impacts on these facilities. Private land use will be negotiated between Pacific Power and the private land owner(s). During Pacific Power's engineering and design process as well as during post-EIS permitting processes there will likely be micro-siting adjustment to the proposed Project based on human and natural resource concerns. During the engineering and design phase of this project, Pacific Power will work with private land owners to spot structures, design the structure locations and route to minimize impacts to landowners and resources through micro-siting.</p>
Leitz, Richard	85-A	<p>'After reading your EIS and northern route supplemental EIS along with impact comparisons, it is a common sense decision to use the northern route choice. This route has similar or less impact both environmentally and socially than other options. It also has the caveat of impacting private property the least which makes it most desirable. In reading your EIS, you mention numerous times that FERC wanted this line put in for power supply and redundancy to benefit Benton, Grant and Yakima counties. Why did Grant county opt out, and what are specific benefits to be realized by Grant county they don't already enjoy? Once again, the Northern Route is the only option that makes good sense.'</p>	<p>Grant County is a Cooperating Agency and has participated in the EIS process. Grant County will make a permitting decision on the Proposed Project. Refer to the Chapter 4, Socioeconomics Sections of the DEIS, SDEIS and FEIS which describe in detail the positive and negative impacts to each of the Counties, including Grant County.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Buermann, Ronald & Judith	88-A	<p>'...Our property at 351 Sage Trail Road is already impacted by the construction of power poles on Pacific Power's property directly above the Pomona Heights Substation. There are six poles being planted with more to come. We have heavy vehicles (not regular sized pick-ups) using our driveway and yard multiple times a day Saturday included. The private sub-contractors crews are always very polite. Your FAQ included in the packet says that Pacific Power ROW agents will contact the private land owners. We have not heard from them. It seems to us Pacific Power should of explained to us about the traffic. Our driveway is paved and was put in for regular vehicles, not heavy equipment. Our yard is chip rocked and that has been displaced due to the traffic of heavy vehicles. We don't believe there is even an easement on file to use our property in this manner. Will Pacific Power be required to repair the driveway should damage occur? Will they be required to replace displace rock on the yard? Shouldn't an agreement have been place before the construction began?...'</p>	<p>The Draft and Supplemental EISs and now the FEIS consider the application for ROW submitted by Pacific Power and reasonable Alternatives. The analysis is designed to assist the BLM and Cooperating Agencies in deciding to grant, grant with modifications, or deny the requests for ROW. The participating agencies do not have authority to grant Rights of Way across private lands. Pacific Power will negotiate with private landowners for use of private land.</p> <p>Pacific Power will work with the land owners (federal, state, county, private) to return lands to pre-disturbance conditions. Required design features (RDFs) will be employed as described in Section 2.3.3 (LU-1) of the FEIS that includes replacement or repair of existing land improvements that are damaged or destroyed during construction.</p> <p>The existing construction being questioned is not related to this proposed Project. Questions for the existing construction should be directed to Pacific Power.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Buermann, Ronald & Judith	88-B	<p>'...MAJOR CONCERN: Our property is located at 351 Sage Trail Road, the last house and property before &amp; above the Pomona Heights Substation. To access the NNR-1a route Pacific Power and their sub-contractors have to use Sage Trail Road, a private, not county, road. The homeowners on Sage Trail Road have a single lane wooden bridge that crosses the Selah/Moxee canal. This bridge was constructed and maintained by the homeowners as well as the dirt road which is Sage Trail Road. We have a major concern about heavy vehicle use of the bridge and road on a daily basis for the years during construction of the Pacific Power poles and 230 kV transmission line. This bridge was built for normal vehicle traffic, not heavy (5-10 ton or more) vehicles. If damage would occur the homeowners would have to replace the bridge as it is our only access to homes on Sage Trail Road. In reference to my first comment about current construction next to our property no one was prepared to even look at the bridge before they started construction. It was Ron Buermann that required the crews to look at the bridge and take pictures. What actions will be taken to ensure the bridge and road are kept in good condition?...</p>	<p>On June 24, 2015 BLM, WSDOT, and Yakima County attended the Pacific Power hosted meeting with Sage Trail Road residents that expressed concern with the proposed Project's location along Sage Trail Road during scoping, public meetings and comments submitted on the DEIS and SDEIS. Pacific Power and the neighborhood group will continue to work together to come to an agreement on Pacific Power's current and future use of their private road and local bridge. In addition, Pacific Power and the landowners developed a modification/adjustment of the line's alignment, Route Segment 1a/NNR-1. This route adjustment has been carried forward into the FEIS (See Section 1.13.1 of the FEIS).</p> <p>The Draft and Supplemental EISs and now the FEIS consider the application for ROW submitted by Pacific Power and reasonable Alternatives. The analysis is designed to assist the BLM and Cooperating Agencies in deciding to grant, grant with modifications, or deny the requests for ROW. The participating agencies do not have authority to grant Rights of Way across private lands. Pacific Power will negotiate with private landowners for use of private land.</p> <p>Pacific Power will work with the land owners (federal, state, county, private) to return lands to pre-disturbance conditions. Required design features (RDFs) will be employed as described in Section 2.3.3 (LU-1) of the FEIS that includes replacement or repair of existing land improvements that are damaged or destroyed during construction.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Buermann, Ronald & Judith	88-C	<p>'...The map included in the packet is inadequate for homeowners to use to comment on. It is difficult to access the maps on computer and they are not very detailed. When I attended the meeting at the Civic Center in Selah they could not tell me where the poles are being located. This is a concern for the homeowners on Sage Trail Road with respect to views, etc...'</p>	<p>On June 24, 2015 BLM, WSDOT, and Yakima County attended the Pacific Power hosted meeting with Sage Trail Road residents that expressed concern with the proposed Project's location along Sage Trail Road during scoping, public meetings and comments submitted on the DEIS and SDEIS. Pacific Power and the neighborhood group will continue to work together to come to an agreement on Pacific Power's current and future use of their private road and local bridge. In addition, Pacific Power and the landowners developed a modification/adjustment of the line's alignment, Route Segment 1a/NNR-1. This route adjustment has been carried forward into the FEIS (See Section 1.13.1 of the FEIS).</p> <p>During the engineering and design phase of this project, Pacific Power (or their designate) will work with private land owners to spot structures and design the structure locations and routing to minimize impacts to landowners and resources through micro-siting.</p>
Buermann, Ronald & Judith	88-D	<p>'...I understand the power poles for the 230 kV transmission line are going up behind my property at 351 Sage Trail Road. I would like to see them go as high up the hill as possible. I understand they can come within 200 feet of the existing 230 kV transmission lines. They then can go across the hill to the north and come down near the existing poles on Sage Trail Road. I own the property directly above my home and am amiable to having them go across the east most area of that property...'</p>	<p>On June 24, 2015 BLM, WSDOT, and Yakima County attended the Pacific Power hosted meeting with Sage Trail Road residents that expressed concern with the proposed Project's location along Sage Trail Road during scoping, public meetings and comments submitted on the DEIS and SDEIS. Pacific Power and the neighborhood group will continue to work together to come to an agreement on Pacific Power's current and future use of their private road and local bridge. In addition, Pacific Power and the landowners developed a modification/adjustment of the line's alignment, Route Segment 1a/NNR-1. This route adjustment has been carried forward into the FEIS (See Section 1.13.1 of the FEIS).</p> <p>During the engineering and design phase of the Project, Pacific Power will work with private land owners to minimize impacts from the Proposed Project.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Buermann, Ronald & Judith	88-E	'...It would seem the NNR-1 line should be directed down Shot Gun Lane right off Sage Trail Road. It would cut out a lot of mileage, save dollars and help with the problem of people's view being blocked...'	On June 24, 2015 BLM, WSDOT, and Yakima County attended the Pacific Power hosted meeting with Sage Trail Road residents that expressed concern with the proposed Project's location along Sage Trail Road during scoping, public meetings and comments submitted on the DEIS and SDEIS. Pacific Power and the neighborhood group will continue to work together to come to an agreement on Pacific Power's current and future use of their private road and local bridge. In addition, Pacific Power and the landowners developed a modification/adjustment of the line's alignment, Route Segment 1a/NNR-1. This route adjustment has been carried forward into the FEIS (See Section 1.13.1 of the FEIS). During the engineering and design phase of the Project, Pacific Power will work with private land owners to minimize impacts from the Proposed Project.
Fuller, Chuck	89-A	'I'm with the airport group here, Desert Aire, and our concern is that the power lines don't come within our flight path, don't come close to our flight path. There's a glide path coming into our airport that we have to worry about. The previous plan to go along the highway out here would have been very close to have been in our flight path, so we want to make sure that doesn't happen. We would like to see it over on the military operations over here myself.'	The EIS analysis (DEIS and SDEIS) has taken into account flight path impacts and will analyze aviation impacts in the FEIS (See Section 2.5.1.4 of the FEIS).
Washington State Department of Ecology	91-A	'....A wetland reconnaissance and/or delineation should be conducted, and the applicant must consider and mitigate for impacts to wetlands if the Project will impact the wetland or wetland buffer (setback area). Impacts to wetlands or other waters of the state will require permitting from the Department of Ecology (401 Certification or Administrative Order) and may require permitting from the U.S. Army Corps of Engineers (Section 404)...'	The EIS analysis was based on the best available data and information available. This included many data sets such as: NWI data, federal and state wetland databases, and a wetland reconnaissance as part of other field survey efforts (see Section 3.14.1 in the SDEIS and FEIS). A full wetland delineation will be conducted on the final selected Alternative and all local, state, and federal permitting will be obtained prior to any construction activities. Effects of the proposed Project and Action Alternatives are analyzed and disclosed in Sections 3-14 and 4-14 of the DEIS, SDEIS and FEIS.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Confederated Tribes and Bands of the Yakama Nation, Yakama Nation Environmental Management Program	92-A	'...The Treaty set forth that Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources. You must seek consultation with the Yakama Nation's sovereign government before undertaking any action that might adversely impact the Yakamas' ceded territories and the rights reserved to the Yakamas on those lands. Upon review of the proposed project, the Yakama Nation does have concerns with the potential impacts and regulatory issues on or near the property. Due to the long period of idleness and resumption of the SDEIS, we are requesting a staff-to-staff meeting between Yakama and the DOI-BLM Spokane District. This will allow for updates, proposed actions and a general discussion. It is the policy of the Yakama Nation to preserve, protect, and perpetuate all significant natural and cultural resources. Only the Yakama Nation can determine what is significant to our Tribe...'	BLM attended a meeting with the Yakama Nation's Environmental Staff on March 10, 2015 in Toppenish, WA. Any additional comments submitted to BLM from the Yakama Nation regarding the EIS are greatly appreciated.
Washington State Department of Natural Resources	93-A	'...Some of our data does include buffers, but various versions of the data are available that improve the locational precision. Additionally, WNHP shared data does generally include records on private lands, where those private lands have been inventoried and the information has been shared with us. We would be glad to work with the appropriate agency and/or consulting firm staff to ensure that WNHP data are used and interpreted appropriately so that it can better contribute to the analysis of this project...'	Any additional review and assistance with the data that is being used in the EIS analysis is greatly appreciated.
Washington State Department of Natural Resources	93-B	'...If temporary construction impacts State Owned Aquatic Land, DNR will require a separate use authorization known as a Right of Entry (ROE). A Right of Entry is a temporary agreement allowing placement of improvements for construction purposes only. Prior to expiration of the ROE's term all improvements must be removed from State Owned Aquatic Lands. NNR-8 proposes to cross State Owned Aquatic Land and may require a ROE. Additionally, as part of the ROE, potential encroachment on the litoral and near shore environment may impact aquatic species and associated habitat. These impacts may require Habitat Stewardship Review and measures as part of the condition of the temporary agreement...'	During the engineering and design phase of this project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting. Pacific Power will be responsible for acquiring all required federal, state, and local authorizations, permits and approvals for the final selected Alternative prior to commencing construction activities for the proposed Project.  Clarifying text was added to Section 4.14.4.17 of the FEIS for the ROE on DNR lands.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Natural Resources	93-C	'...The cumulative impacts discussion should analyze and specifically reference impacts and future management requirements for Washington DNR natural area preserves in the project area. The maps in Figure 4. 7-2 and Figure 4. 17-1 (and similar) should show Washington DNR natural area preserves as distinct from Washington DNR state trust lands. DNR-managed natural area preserves (NAPs) are irreplaceable and contain rare, threatened or endangered flora and fauna. The uniqueness of NAPs require additional care to protect sensitive species. In addition to avoidance of specific locations of rare features or timing for avoidance of wildlife impacts, the project proponent must pre-plan with the DNR Natural Areas Program any actions on DNR-owned and managed natural areas; and mitigate as needed...'	<p>The FEIS has included the suggested mapping changes (Appendix A).</p> <p>The FEIS has provided additional language to address the needed coordination between Pacific Power and DNR Natural Areas Program (Section 4.8.5.1 and 4.17 of the FEIS). In addition, the FEIS has provided additional language to address WSDOT's environmental management buffer near the I-82 eastbound Selah Rest Area (Section 4.7.4.12 of the FEIS).</p> <p>The FEIS has included any required mitigation for DNR lands (Section 2.2.2.5 of the FEIS).</p>
Washington State Department of Natural Resources	93-D	'...Statement is not supported. Revise cumulative impacts analysis section. Citation: Natural Area Preserves Act - RCW 79.70. 1. Even if construction of a new line(s) across the canyon are east of the NAP on the west side of Interstate 82, they remain within the boundary of Selah Cliffs NAP ("lands eligible for inclusion in the NAP") due to habitat values on those lands. Also, any construction access through the NAP for construction or staging will have impacts, both short-term and potentially cumulative and permanent. Maintenance access for any towers or poles located on the valley floor or lower slopes will cause similar impacts. Concerns with access through the NAP include spread of weeds, disturbance of wildlife, and potential interference with visitors at the interpretive (environmental education) trail. 2. It appears that the proposed line would go over a portion of cliff face (on the south side of the canyon) that may harbor basalt daisy (Erigeron basalticus). Construction activities may pose a risk directly to the cliff face. No materials should be cast over the top of the cliff. 3. The cliff is also a nesting location for prairie falcon (Falco mexicanus), a Washington State Department of Fish and Wildlife state-listed "monitor" wildlife species. Construction and access footprints should avoid known nesting locations. Construction and maintenance activities should be avoided during the nesting season. 4. Any construction activities will lead to increased exposed ground which, in this landscape, will lead to an increase in weeds. Ongoing weed control of disturbed areas within the natural area preserve boundary will need to be mitigated, and it may increase site management costs for the DNR Natural Areas Program to manage Selah Cliffs Natural Area Preserve...'	<p>The FEIS has included additional information for specific resource protection such are resource surveys to support avoid and minimization of impacts during design and structure spotting and preconstruction resource surveys (Section 2.3 and Chapter 4 of the FEIS). The Plan of Development will detail agency approved noxious weed management plans, restoration plans, and other resource protection plans to avoid, minimize, and mitigate resource impacts to include potential impacts to the NAP, WSDOT's environmental management buffer, botanical species, and avian species.</p> <p>The FEIS has provided additional language to address the needed coordination between Pacific Power and DNR Natural Areas Program (Section 4.8.5.1 and 4.17 of the FEIS). In addition, the FEIS has provided additional language to address WSDOT's environmental management buffer near the I-82 eastbound Selah Rest Area (Section 4.7.4.12 of the FEIS).</p> <p>The FEIS has included any required mitigation for DNR lands (Section 2.2.2.5 of the FEIS).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Natural Resources	93-E	'...Statement is not supported. Revise cumulative impacts analysis section. Citation: Natural Area Preserves Act - RCW 79.70; and State of Washington fish and wildlife statutes. 1. The Vantage Substation is nested within the area that has been recommended by the State of Washington Natural Heritage Advisory Council (and the DNR Natural Heritage Program) as a future natural area preserve (NAP). 2. Proposed power lines approaching the substation go through areas that appear to be suitable habitat for the striped whip snake (Masticophis taeniatus), a Washington State Department of Fish and Wildlife state-listed "candidate" wildlife species. This area is the only known extant site for this species in Washington. Proposed power lines approaching the substation go very near, and perhaps through, a site for annual sandwort (Minuartia pusilla), a state-listed "sensitive" plant species. There are seven known occurrences in Washington, but the occurrence near the Vantage Substation is the only recent one; all others are older and considered historical and are not considered extant...'	Additional clarification has been added to the FEIS land use section(s) that speaks to the future NAP near the Vantage Substation (Sections 3.4.3.2 and 4.4.4.8 of the FEIS).  The FEIS has included additional information for specific resource protection such as resource surveys to support the avoidance and minimization of impacts during design and structure spotting and preconstruction resource surveys (Section 2.3 and Chapter 4 of the FEIS). The SDEIS describes the proposed NAP in Section 3.4.3.2.
Yakima County Public Services	94-A	'...Yakima County Public Services Roads Department will require the completion of Franchise Application (Attached to letter) for the crossing of various "Yakima County Rights of Way" (ROW) within the projected service area of the revised "Pomona Heights 230kV Transmission Line Project" within the boundaries of Yakima County. Yakima County projects potential crossing(s) of roads including (but not limited to) : Corriedale Road, E. Pomona Road, Pomona Heights, Schlagel Road, Firing Center Road and Tipp Road. Yakima County will request a "System-Side" franchise (rather than individual franchises for each crossing of Yakima County roadways and rights of way) to streamline the franchise process and eliminate unnecessary repetition. A system-wide franchise would provide a 20-year approval for the applicant to utilize Yakima County ROW to place the transmission line "in, along, over, or under" county ROW . The Yakima County Franchise coordinator has NO specific concerns regarding the proposed alignment(s) of the transmission line pending the use of approved local, state, and federal installation practices as long as all work is performed within the stated service area of the project. The public hearing would be held within 3-5 weeks following submittal of your Franchise Application (pending available hearing scheduling). There is no permit cost preceding the public hearing, however, a bill for the public hearing notices in the Yakima Herald Republic will be sent for payment to the applicant prior to final issuing of the franchise...'	Clarifying text has been added to the FEIS to further describe Yakima County's Franchise Application requirement (Section 4.7.3 of the FEIS).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
U.S. EPA	95-A	'...We recommend that BLM continue to coordinate with the U.S. Fish and Wildlife Service and National Marine Fisheries Service and/or Washington State Department of Fish and Wildlife, as appropriate to address this and other potential impact to species and fisheries. The final EIS should include relevant information developed as a result of the coordination with USFWS, National Marine Fisheries Service and/or Washington State Department of Fish and Wildlife, particularly outcomes of consultations with the Services and recommended measures to protect species...'	Section 7 of the ESA will be fully complied with. A BA will be prepared and the federal cooperating agencies and USFWS will formally consult on threatened and endangered species protected under the ESA. The BA will be prepared for the Agency Preferred Alternative.
U.S. EPA	95-B	'...we recommend that the Final EIS include an estimate of greenhouse gas (GHG) emissions associated with the proposal, and a discussion of practicable mitigation to reduce the emissions. They recommend that BLM consider the approaches for climate impact assessment outline in the revised draft guidance and include relevant information in the Final EIS...'	The FEIS includes revised text in Chapter 4-13 that incorporates EPA's recommendations (an estimate of greenhouse gas [GHG] emissions, a discussion of practicable mitigation to reduce the emissions, and a climate impact assessment).
U.S. EPA	95-C	'...The final EIS should include results of the comprehensive geotechnical investigation of the analysis area, information on how seismicity was evaluated, and how the project was modified to reduce risks...'	Information on the seismicity evaluation and geologic and soils mitigation measures has been clarified in the FEIS (Section 4.15.5 of the FEIS).
Washington State Department of Fish and Wildlife	96-A	Reasonable Range of Alternatives – No Alternative Outside of Priority Areas of Conservation (PAC) for Sage-Grouse: '...Washington State has a few small areas mapped as PACs due to the limited sage-grouse population and distribution, and limited suitable habitat. Another consideration is the proportion of Washington's PACs that would be impacted compared to other states...Considerable latitude exists for siting a transmission line. No similar latitude exists with respect to the key locations for sage-grouse, such as a PAC. The sage-grouse population has retracted to these places and they are the last of the suitable habitats that support them. Selecting a PAC for placement of new infrastructure such as a transmission line when transmission lines have been shown to have deleterious impacts on sage-grouse is not reasonable or prudent. It is reasonable to re-direct the route of the project. No alternatives are located outside of the PAC, consequently, the alternatives provided do not represent a reasonable range of alternatives...'	<p>Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received and present a reasonable range of alternatives. Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Additional resource protection guidance and recommendations have evolved over the course of this EIS and new information that has become available during the EIS process has been incorporated into the EIS analysis and mitigation development for Greater Sage-Grouse. Please see Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS for more information on how the Project is consistent with the standard mitigation hierarchy.</p> <p>Complete avoidance of Greater Sage-Grouse impacts from the Proposed Project is not feasible and practical based on the location of the existing substations and the objectives of Pacific Power.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Fish and Wildlife	96-B	<p>Design Life of the Existing Line and Project Justification: '...Utilizing the existing transmission line as justification and mitigation for co-locating the proposed new transmission line is highly problematic...The existing transmission line was constructed at an earlier time with little consideration for its impacts, and this old action should not set permanent baseline for all future actions...Based on our experience with this proposal, we are persuaded that the existence of the new transmission line as envisioned in the new northern route alternative, would then be used to justify the replacement location of the old line...If the existence of the old line is justification for the new route, the design life and impacts of that route should be available for analysis at the same time. To date, we have not been permitted a thorough discussion of the old line...The inadequacy of the existing line with respect to the electrical grid, is the basis and the justification for the new line. The route of the old existing line serves as justification for the route selection of the new line. Ownership and operation of the two lines are inextricably linked. These two lines are interdependent interrelated elements of a single proposal. This selective partitioning of the two lines with respect to environmental review is problematic and frustrates analysis. Within the supplemental draft, we can't analyze the old line now and we won't analyze the new line later...While we concede that some mitigation credit might be justified in co-location compared to pioneering a whole new route, it should be minimal as avoidance of any impact should be the priority under circumstances such as these...'</p>	<p>The Project is proposed for electrical utility regulated reliability needs based on current and projected electric load requirements. The Proposed Project is part of a regional need to provide reliable electric service Pacific Power's customers. The existing transmission line met the electrical needs at the time based on electric load conditions and regulations. The Project is proposed to meet current and projected electric load and regulatory requirements (See Section 1.6 of the FEIS for additional information regarding the project's purpose and need).</p> <p>The FEIS has expanded the cumulative effect analysis to clarify past actions such as the existing transmission lines and land use practices (Section 4.17 of the FEIS). The final decision will be based on the analysis of the entire suite of human and natural resources.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Fish and Wildlife	96-C	Significant Lost Opportunity for Restoration (within a PAC): '...The potential to underground or to relocate the existing transmission line outside of the PAC is a restoration opportunity the importance of which is difficult to overstate. The potential to enhance a PAC to this degree is significant for recovery and sustainability of the greater sage-grouse in Washington. Conversely, co-location of the new line and the old line above ground within the PAC removes this restoration opportunity since it would in essence, invest in the location to such a degree that subsequent remediation would be made financially unavailable. We must preserve significant opportunities for restoration within this key PAC if we have any hope of recovering the greater sage-grouse in Washington...'	<p>The proposed Project under evaluation in this EIS has incorporated measures to minimize and reduce impacts as a result of the Action Alternatives under consideration. The existing Pacific Power Pomona-Wanapum 230kV transmission line has been accounted for in Chapter 3 of the FEIS as it is part of the existing condition as well as in the Cumulative Effects Section (Section 4.17) of the FEIS. Additional measures related to Pacific Power's existing Pomona-Wanapum 230kV transmission line are also presented as mitigation for certain resources (Chapter 4 of the FEIS). Burying two route segments (identified by WDFW) of the proposed transmission line is a design option for the NNR Alternative analyzed in the SDEIS and this analysis was carried forward and considered in the FEIS (See Chapters 2, 3, and 4 of the FEIS).</p> <p>The FEIS has expanded the cumulative effect analysis to clarify past actions such as the existing transmission lines and land use practices (Section 4.17 of the FEIS). The final decision will be based on the analysis of the entire suite of human and natural resources.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Fish and Wildlife	96-D	<p>Mitigation: '...From a sage-grouse conservation standpoint, the Yakima Training Center PAC is an irreplaceable location. The transmission lines will be a significant negative impact to that PAC. We are being asked to mitigate for the irreplaceable, which is in itself a departure from the reasonableness standard. We are very concerned with the off-site, in kind as well as off-site out of kind mitigation that has been suggested as replication of a PAC is unlikely and without precedent. Mitigation should support the Yakima Training Center PAC. The YTC is more topographically diverse than other PACs in Washington and it is strategically situated within Washington State. It also is in close proximity to the largest investments in habitat by the State of Washington, namely our wildlife areas. These public investments predate this proposal and their potential to contribute to greater sage- grouse recovery would be materially diminished as a result of this transmission line...The bottom of the list and least desirable alternative in mitigation sequencing is off-site out-of-kind mitigation, and we find it unacceptable to sacrifice this greater sage-grouse population by attempting to mitigate impacts elsewhere...Continuing to impact one of the last places greater sage-grouse occur with the hopes of mitigating for the impact at locations far removed from the impact area poses an unnecessary risk to a threatened public resource. As we have previously stated during the environmental review process, transmission line burial is necessary to avoid adverse impact to greater sage- grouse in the Yakima Training Center PAC since all alternatives considered are located within it. Note that we are not suggesting burial of the entire length of the transmission line, but the strategic burial of the line in locations where greater sage-grouse distribution and migration to adjacent habitat is likely to occur...'</p>	<p>The DEIS and SDEIS analyzed the direct, indirect and cumulative effects of the proposed Project and Action Alternatives. This analysis recognized the unique habitat resource values within the PAC and identified the irreversible and irretrievable impacts of the proposed Project. Where impacts to Greater Sage-Grouse habitat cannot be offset, Compensatory Mitigation Plan will address residual impacts. The Project- specific Greater Sage-Grouse Compensatory Mitigation Framework (Framework) that has been developed for the proposed Project will serve as a guidance document for Pacific Power's development of a Greater Sage-Grouse Compensatory Mitigation Plan (CMP). Please see Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS for more information on how the proposed Project is consistent with the standard mitigation hierarchy.</p> <p>Burying two route segments (identified by WDFW) of the proposed transmission line is a design option for the NNR Alternative analyzed in the SDEIS. This analysis was carried forward and considered in the FEIS (See Chapters 1, 2, 3, and 4 of the FEIS).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Fish and Wildlife	96-E	Multiple Use: '...In the executive summary of the SDEIS (page as-ii), the BLM references the Federal Land Policy and Management Act of 1976 (FLPMA) multiple use mandate as their "need for action" to respond to Pacific Power's right-of-way (ROW) application...The use or resource with the most restricted distribution and flexibility with respect to occurrence and habitat should be viewed differently and weighed differently than a use that could be realized more broadly across BLM ownership. There is considerable plasticity as to where a transmission line could be placed: underwater, across a mountain, underground, across a desert, across farm land, over water or through a forest. Conversely, greater sage-grouse have a comparatively narrow set of habitat requirements and their distribution and population in Washington is small and threatened and opportunities to restore suitable habitat is also limited...The proposal as presented appears to be a departure from the multiple use standard, particularly if significant greater sage-grouse restoration opportunities within the PAC are made unavailable in the course of this proposal...'	BLM must consider multiple uses and analyze the potential impacts to human and natural resources (such as Greater Sage-Grouse) when considering ROW applications. The EIS documents analyze potential impacts of the proposed Project with multiple uses and internal policies for protecting sensitive species, including Greater Sage-Grouse. Information critical to decision making on an authorization for the ROW application is contained in the final NEPA documents. BLM and its agency partners (the interagency Sage-Grouse Subgroup comprised of state and federal biologists, including WDFW) have worked cooperatively to develop a Project -Specific Framework for Development of a Sage-Grouse Compensatory Mitigation Plan (Framework; Appendix B-6 of the FEIS) The Framework will be utilized by Pacific Power as guidance as they develop their Project -Specific Sage-Grouse Compensatory Mitigation Plan to evaluate and identify the Project's mitigation actions to mitigate for residual impacts to Sage-Grouse.
Washington State Department of Fish and Wildlife	96-F	Project Purpose: '...This proposal has been described as a measure needed in order to eliminate the potential for redistributed loads and the overloading of the adjacent transmission system. It would offer continued reliable and efficient service to the Yakima Valley and address future reliability issues within the Mid-Columbia transmission system, (bottom of page ES-1), and prevent failure to the regional transmission system if electrical outages of the existing Pomona-Wanapum 230 kV transmission line were to occur (bottom of page 2-5). Outages are less frequent in underground transmission lines. We are told that outages involving buried transmission lines are longer, from 5 to 9 days or 8 to 12 days depending on the technology used (bottom of page 2-4). If repairs to the existing above ground lines could be performed in less than a day (our experience) or a far more brief time frame than the 5 to 9 days cited, why is the proposed new line being built to a 50 year standard if it is to address a temporary outage or temporary re-routing of electricity? This short time frame should be reflected and change assumptions regarding soil heating and line burial depth, which appear to be significantly overstated (top of page 2-43). Underground transmission lines standards could be reduced if the line is needed for emergency use and not continuous use. The assumptions in the SDEIS for line burial are for a line under continuous use which is different than the stated need...'	For redundancy and to meet the regulatory requirements for reliable electric service to customers, the proposed transmission line Project must be considered for permanent use and not a temporary, emergency, and/or back up transmission alternative (See Section 1.6 of the FEIS for additional information regarding the Pacific Power's need for the proposed Project's).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Fish and Wildlife	96-C	<p>Federal Listing of the Greater Sage-Grouse: '...One of the primary issues that the USFWS considers when conducting their review process for listing is the adequacy of existing regulatory mechanisms or protections for the species. In this Vantage to Pomona proposal, we have a federal agency, the Bureau of Land Management (BLM) conducting an Environmental Impact Statement (a federal process) across federal lands (Yakima Training Center, BLM, Bureau of Reclamation and Federal Highway Administration) on behalf of a public utility which also has a significant federal nexus. This development proposal with all these federal ties will significantly impact an irreplaceable location for sage-grouse. If we are unable to protect the bird here, under these sets of circumstances, it is unreasonable to conclude that we could protect the sage-grouse elsewhere on federal land or on private land apart from a listing. A federal listing would have broad implications on other existing and proposed transmission lines and power generating entities as well as the private sector. It could also increase required sage-grouse protection areas and significantly alter uses at the Yakima Training Center...'</p>	<p>The DEIS and SDEIS analyzed the direct, indirect and cumulative effects of the proposed Project and Action Alternatives. This analysis recognized the unique habitat resource values within the PAC and identified the irreversible and irretrievable impacts of the proposed Project. Where impacts to Greater Sage-Grouse habitat cannot be offset, a Compensatory Mitigation Plan will address residual impacts. The Project-Specific Framework for Development of a Sage-Grouse Compensatory Mitigation Plan (Framework) that has been developed for the proposed Project will serve as a guidance document for Pacific Power's development of a Greater Sage-Grouse Compensatory Mitigation Plan (CMP). Please see Appendix B-6, Framework for the Development of a Sage-Grouse Compensatory Mitigation Plan, and Appendix B-7, Compliance with Applicable Greater Sage-Grouse Policies, Plans, and Procedures, of the FEIS for more information on how the Project is consistent with the standard mitigation hierarchy.</p> <p>Burying two route segments (identified by WDFW) of the proposed transmission line is a design option for the NNR Alternative analyzed in the SDEIS. This analysis was carried forward and considered in the FEIS (See Chapters 1, 2, 3, and 4 of the FEIS).</p> <p>Note that upon consideration of the conservation measures put in place by state and federal agencies and private stakeholders to protect Sage-Grouse, USFWS determined in 2015 that range-wide listing under the ESA was not warranted for Sage-Grouse. Furthermore, USFWS determined that the Columbia Basin population did not constitute a DPS and did not warrant listing under the ESA.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Fish and Wildlife	96-H	<p>Failure to Incorporate Existing Studies: '...Numerous studies and reports have been developed that directly address the area and/or the issues associated with this transmission line proposal. The Conservation Objectives Team (COT) Report, the Statewide and Columbia Plateau Wildlife Habitat Connectivity studies, the Arid Lands Initiative (ALI) and the Washington State Greater Sage-Grouse Recovery Plan and the Western Governors Association (WGA) Crucial Habitat Assessment Tool or CHAT are all available to inform this project. The findings of these studies do not appear to be incorporated or to influence the alternatives. This is akin to performing an EIS and then developing a project in a location not contemplated in any of the alternatives. All alternatives are in the PAC or sage-grouse Habitat Concentration Areas (HCA) and center on this small remnant population of birds that has almost nowhere else to go...'</p>	<p>The DEIS and SDEIS analyzed the direct, indirect and cumulative effects of the proposed Project and Action Alternatives. This analysis recognized the unique habitat resource values within the PAC and identified the irreversible and irretrievable impacts of the proposed Project. Where impacts to Greater Sage-Grouse habitat cannot be offset, a Compensatory Mitigation Plan will address residual impacts. The Project-Specific Framework for Development of a Sage-Grouse Compensatory Mitigation Plan (Framework) that has been developed for the Project will serve as a guidance document for the development of Pacific Power's Greater Sage-Grouse Compensatory Mitigation Plan (CMP). The Project-Specific Framework for Development of a Sage-Grouse Compensatory Mitigation Plan ((Appendix B-6), Greater Sage-Grouse Technical Report (Appendix B-5) and FEIS Sections 3.3 and 4.3 contain citations to relevant reference materials and literature utilized in the compilation of those documents.</p> <p>Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received. Action Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Complete avoidance of Greater Sage-Grouse impacts from the proposed Project is not feasible and practical based on the location of the existing substations and the objectives of Pacific Power. Development of an Action Alternative that avoids the YTC PAC would be out of the scope of this proposed Project and not address Pacific Power's objectives. Additional resource protection guidance and recommendations have evolved over the course of this EIS and new information that has become available during the EIS process has been incorporated into the EIS analysis and mitigation development for Greater Sage-Grouse (Sections 3.3, 4.3, Appendix B-5, and Appendix B-6 of the FEIS).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Fish and Wildlife	96-I	<p>Additional Information: '...Clearly we have continuing concerns regarding other shrub-steppe obligate wildlife such as the striped whip snake, white-tailed and black-tailed jackrabbits, ground squirrels and other fossorial species that would be impacted by habitat loss and lost function associated with increased perching habitat resulting from this proposal. We are concerned with the how the information portrayed on Tables 1, 2 and 4 on pages B-5-34 and B-5-37 is portrayed and is susceptible to misleading interpretation. These tables are a further partitioning of the PAC which is one of the last occupied slices of habitat in Washington State and must be relied on for recovery. The tables assign population utilization figures to a threatened species. This information might be compelling if a robust population existed but since the population is around 230 birds, few conclusions can be made about lower utilization figures. Table 4 portrays acres disturbed and fails to mention acres under the influence of the line (indirect impacts) which is a significantly greater type of impact with sage-grouse and is not widely understood...'</p>	<p>The tables referred to in Appendix B-5 of the FEIS summarize and compare the route segments of the NNR Alternative with regard to Sage-Grouse utilization, leks, and management units. The tables reflect the best available data to characterize the distribution and patterns of habitat use by the YTC Sage-Grouse population. In the text we thoroughly describe the methods reflected in the tables and acknowledge that currently unoccupied areas may become reoccupied in the future if the YTC Sage-Grouse population recovers and expands into currently unoccupied areas. But we believe that current patterns of utilization are relevant and not misleading. Table 4 portrays acres disturbed and acres present within the analysis area. Indirect disturbances within the analysis area are not quantified in Table 4, but are discussed in Chapter 4, Appendix B-5, and Appendix B-6.</p>
Grant County Washington	97-B	<p>'Grant County adopted an updated Shoreline Master Program (SMP) in September 2014. The updated SMP requires that any development that takes place within 200 ft. of the ordinary high water mark (OHWM) of a jurisdictional body of water result in a no net-loss of ecological function within the shoreline environment....Pursuant to Table 24.12.200(d) of the SMP, utilities are allowed with a Substantial Development Permit in the Rural Conservancy environment subject to compliance with the requirements in GCC 24.12.450.....If any of the support structures will be located within 200 ft. of the OHWM of this portion of the river or if there will be any ground disturbing activities within this same area, additional mitigation measures will be required to ensure that no net-loss of ecological function of the shoreline is achieved.'</p>	<p>During the engineering and design phase of this proposed Project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting.</p> <p>The following text was inserted in the FEIS (Section 3.14.2.1 of the FEIS): The FERC has prepared an Environmental Assessment for Grant County PUD's proposed SMP and approval is pending. Grant County adopted an updated SMP in September 2014 (Washington Department of Ecology 2015). The updated SMP requires that any development that takes place within 200 feet of the ordinary high water mark (OHWM) of a jurisdictional body of water result in a no net-loss of ecological function within the shoreline environment. If any of the support structures will be located within 200 feet of the OHWM of this portion of Priest Rapids Reservoir or if there will be any ground disturbing activities within this same area, additional mitigation measures will be required by Grant County PUD to ensure that no net-loss of ecological function of the shoreline is achieved. As specified by SEPA comments, also added text regarding Kittitas County SMP (Section 3.14.2.1 of the FEIS).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Department of the Army, Installation Management Command, Joint Base Lewis-McChord Yakima Training Center	98-A	'...This project increases the cumulative impacts that must be considered and mitigated for in the future. The mission of JBLM YTC is to provide training support for transient military units and organizations by sustaining training lands, range complexes, and support facilities in order to enhance readiness and to provide sustained capability now and into the future to train our nation's armed forces. This is done within the context of providing stewardship of resources in accordance with the Sikes Act. While the Army acknowledges the purpose and need for this project, it also recognizes the effects that such non-Army related projects can have on the consideration and analysis of future mission related projects and training events on YTC. The cumulative effects analysis within this document needs to address the potential to impact future mission related projects and training events...'	The FEIS includes additional information on the impacts to the military training mission at YTC to include direct, indirect, and cumulative impacts (Sections 4.4 and 4.17 of the FEIS).
Department of the Army, Installation Management Command, Joint Base Lewis-McChord Yakima Training Center	98-B	'...While the NNR reduced certain types of impacts from previous alternatives considered and eliminated on YTC, it will still have impacts to the military mission. An additional power line located on the installation, even though co-located with an existing one, increases safety hazards and operational concessions that must be considered in military aviation training operations. This incremental impact (NNR) represents encroachment on training capability and its direct, indirect, and cumulative effects on the training mission needs to be assessed in detail and disclosed in the document...'	The FEIS includes additional information on the impacts to the military training mission at YTC to include direct, indirect, and cumulative impacts (Sections 4.4 and 4.17 of the FEIS).
Department of the Army, Installation Management Command, Joint Base Lewis-McChord Yakima Training Center	98-C	'...JBLM YTC is concerned with a potential federal listing of sage grouse and impacts of this listing on the military mission. Protection measures for this species currently occur on 24 percent of the installation resulting in a reduction of training capacity. It is anticipated that additional land-use constraints are likely if the species is listed given the entire installation is within a Primary Area of Conservation (PAC) for sage grouse as identified within the Conservation Objectives Team report. Regulatory burdens on training lands associated with federally listing sage grouse could result in significant training restrictions putting the installation's ability to support its military mission in jeopardy. Additional reductions in training capacity, either from direct and indirect impacts from the placement of a power line on sage grouse or from the implementation of required mitigation measures resulting in increased land-use constraints, cannot be supported by the YTC...'	The FEIS includes additional information on the impacts to the military training mission at YTC to include direct, indirect, and cumulative impacts (Sections 4.4 and 4.17 of the FEIS).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
<p>Department of the Army, Installation Management Command, Joint Base Lewis-McChord Yakima Training Center</p>	<p>98-D</p>	<p>'...Not evident from previous and current documentation is whether there was consideration and analysis of route alternatives that avoids the area identified as the Yakima PAC. Evaluation of such a route would document an examination of a potentially viable alternative not already considered. Such a route, if proposed, would minimize direct, indirect, and cumulative impacts to sage grouse and eliminate impacts to the military training mission altogether....'</p>	<p>The DEIS and SDEIS analyzed the direct, indirect and cumulative effects of the Proposed Project and Action Alternatives. This analysis recognized the unique habitat resource values within the PAC and identified the irreversible and irretrievable impacts of the proposed Project. Where impacts to Greater Sage-Grouse habitat cannot be offset, Pacific Power's Compensatory Mitigation Plan will address residual impacts. The Project Specific Framework for Development of a Sage-Grouse Compensatory Mitigation Plan (Framework) that has been developed for the proposed Project will serve as a guidance document for Pacific Power's development of a Greater Sage-Grouse Compensatory Mitigation Plan (CMP). The Project-Specific Framework for Development of a Sage-Grouse Compensatory Mitigation Plan (Appendix B-6), Greater Sage-Grouse Technical Report (Appendix B-5) and FEIS Sections 3.3 and 4.3 contain citations to relevant reference materials and literature utilized in the compilation of those documents.</p> <p>Action Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received. Action Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Complete avoidance of Greater Sage-Grouse impacts from the proposed Project is not feasible and practical based on the location of the existing substations and the objectives of applicant Pacific Power. Development of an Action Alternative that avoids the YTC PAC would be out of the scope of this proposed Project and not address Pacific Power's need for the proposed Project. Additional resource protection guidance and recommendations have evolved over the course of this EIS and new information that has become available during the EIS process has been incorporated into the EIS analysis and mitigation development for Greater Sage-Grouse (Sections 3.3, 4.3, Appendix B-5, and Appendix B-6 of the FEIS).</p>
<p>Department of the Army, Installation Management Command, Joint Base Lewis-McChord Yakima Training Center</p>	<p>98-E</p>	<p>'...JBLM YTC understands that the mitigation framework to be utilized by the proponent in developing a mitigation plan for this project is still being developed by an interagency sage grouse working group associated with this project. It is the Army's position that it be made clear in the SDEIS that this framework only applies to this specific project. It is not a general purpose mitigation plan for Army training which is governed by other authorities and the installation INRMP...'</p>	<p>Additional text has been added to the FEIS to clarify and reiterate that the mitigation developed for this proposed Project is project specific and not intended for application to existing, ongoing, or future military training (Sections 4.4 and 4.17 of the FEIS).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Transportation	99-A	'...Section 1.4.2.6 WSDOT: The SDEIS and the FEIS must also address SEPA issues so that no other studies will be required necessary in order for WSDOT, as the SEPA nominal co-lead agency, to issue the SEPA determination for the project...'	BLM will continue to work with the SEPA nominal co-lead agency (WSDOT) and their sub-contractor to ensure that the environmental review process and EIS for the proposed Project adequately addresses SEPA issues and complies with SEPA. The SDEIS contained a Draft SEPA Environmental Checklist. This Environmental Checklist will be utilized to ensure that the FEIS includes all information needed for WSDOT to issue a SEPA determination. SEPA issues were addressed in Chapters 3 and 4 of the FEIS.
Washington State Department of Transportation	99-B	'...Table 3.4-7, Land Use and Jurisdiction Summary by Route Segment, Transportation row, NNR-4 column: WSDOT manages land in this route segment; however, the total in this column is blank...'	The Land Use acreage in Table 3.4-7 was corrected in the FEIS (now Table 3.4-9A in Section 3.4.4.18 of the FEIS).
Washington State Department of Transportation	99-C	'...Section 3.7.2.1 Federal Highways and State Routes, 3rd paragraph: There are four rest areas within the project area. The westbound Selah Creek Rest Area should be included as well...'	The FEIS text was corrected to reflect the west-bound Selah Creek Rest Area (Section 3.7.2.1 of the FEIS). This rest area is located just outside of the Project area approximately 1.5 miles northeast of the east-bound Selah Creek Rest Area.
Washington State Department of Transportation	99-D	'...Section 3.11.4.9, MR-1, 2nd paragraph: The information in this section states that the TCP has not yet been evaluated for NRHP eligibility. FHWA and WSDOT would like to know when this will take place...'	BLM will continue to work with the tribes and the SHPO on eligibility determinations.
Washington State Department of Transportation	99-E	'...Table 3.11-2 Cultural Resources within 150-ft Corridors by Route Segment, MR-1 row: In Section 3.11.4.9 MR-1, 1 TCP was reported within the 150-ft corridor. However, neither its presence nor its NRHP eligibility status is recorded in this table...'	The TCP recording for MR-1 in Table 3.11-2 was corrected in the FEIS (Section 3.11.5.2 of the FEIS).
Washington State Department of Transportation	99-F	'...Table 3.11-3 Cultural Resources within 500-ft Corridors by Route Segment, MR-1 row: Same issue for table 3.11-2 within the 500-ft corridor...'	The TCP recording for MR-1 in Table 3.11-3 was corrected in the FEIS (Section 3.11.5.2 of the FEIS).
Washington State Department of Transportation	99-G	'...Section 3.14.3 Permitting Process: WSDOT is not a regulatory agency, nor did WSDOT participate with the regulatory agencies to develop the JARPA process...'	Text was corrected in the FEIS to remove WSDOT from the noted reference on SDEIS page 3-219 and in Section 3.14.3.3 of the FEIS).
Washington State Department of Transportation	99-H	'...Section 4.4.4.8 Route Segment NNR-8, 3rd paragraph: Please note that WSDOT approval is required in order for the project to cross SR 243...'	Text identifying the requirement for WSDOT approval to cross SR-243 was included in the FEIS (Section 4.7 of the FEIS).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Transportation	99-I	'...Section 4.7.1.3 Impact Types, 1st paragraph: WSDOT concurs that I-82 and SR-243 will not be closed during construction of the towers; however, stringing of the lines would require closures. The statement: "Transmission line construction would not require temporary closure of the main highways (Interstate [I] 82 and State Route [SR] 243)..." is contradictory to information provided on Page 4-116, which states "Transmission line stringing activities over state highways and county roads could require the temporary closure of traffic lanes..." (emphasis added)...'	The FEIS provides additional text that will remove the contradictory information. Stringing conductors across roadways will require some level of closure for safety. Per WSDOT's recommendation, the text will be revised to state: "Transmission line stringing activities over state highways and county roads will require..." (Section 4.7.3 of the FEIS).
Washington State Department of Transportation	99-J	'...Section 4.7.1.3 Impact Types, 2nd paragraph: The section of I-82 is designated as a Scenic Class A highway. Because of this designation, special design should be incorporated to minimize the visual impacts of the project...'	During the engineering and design phase of this proposed Project, Pacific Power will work with agencies and private land owners to spot structures and design the structure locations and routing to minimize impacts to resources through micro-siting. Visual mitigation measures are described in Section 4.8.6 of the SDEIS and Section 4.8.6 of the FEIS.
Washington State Department of Transportation	99-K	'...Section 4.7.3 Impacts Common to All Route Segments and Design Options, 3rd paragraph: Please change this to say "Project construction activities <del>would not</del> may require <del>major</del> road closures <u>at the I-82 or SR 243 crossings</u> during construction. <del>however, lane</del> Other road closures may also occur..."...'	The suggested modification was reflected in the FEIS (Section 4.7.3).
Washington State Department of Transportation	99-L	'...Section 4.7.3 Impacts Common to All Route Segments and Design Options, 4th paragraph: Please note that WSDOT is not responsible for approving the TMP for county roads. Please change this to say either "...approved by WSDOT and/or local agencies...." or "...approved by WSDOT and/or agencies with jurisdiction..."...'	The suggested modification was reflected in the FEIS (Section 4.7.3).
Washington State Department of Transportation	99-M	'...Section 4.7.3 Impacts Common to All Route Segments and Design Options, 5th paragraph: Access to the interstate is highly restricted to the interchanges. Access at Exit 11 to cross onto private property or to JBLM YTC requires either a permanent access break (such as for maintenance) or a temporary access break (such as for construction).  The text states "A permanent access break, authorizing use of Exit 11, would be required for construction access." Since this action is related to construction, a temporary access break would be required...'	Clarifying text was added to the FEIS for Exit 11 use during construction and for maintenance and operation (Section 4.7.3).
Washington State Department of Transportation	99-N	'...Section 4.7.3 Impacts Common to All Route Segments and Design Options, 3rd paragraph: Please change this to: "...this permission would be secured prior to applying for a permanent or temporary break in access permit..."...'	The suggested modification was reflected in the FEIS (Section 4.7.3).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Washington State Department of Transportation	99-O	'...Section 4.7.4.1 Route Segment NNR-1, 1st paragraph: Access to this segment from I-82 would be from Exits 26 or 29 only...'	Clarifying text was added to the FEIS for use of Exits 26 or 29 during construction and for maintenance and operation (Section 4.7.4.1 of the FEIS).
Washington State Department of Transportation	99-P	'...Section 4.7.4.3 Route Segment NNR-3, 2nd paragraph: Please note that the eastbound Selah Creek Rest Area is located at approximately MP 24.5.  The text states "No permanent access break would be required for this crossing." If the project will cross the interstate (either above- or below-ground), a permanent access break is required...'	Clarifying text was added to the FEIS for the Eastbound Selah Creek Rest Area (Section 4.7.4.12 of the FEIS). Additional text was added to the FEIS to clarify the need for a permanent access break (Section 4.7.4.12 of the FEIS).
Washington State Department of Transportation	99-Q	'Section 4.7.4.4 Route Segment NNR 40/4u, Overhead Design Option, 1st paragraph: Use of Exit 11 will require FHWA and WSDOT approval.  Overhead Design Option, 2nd paragraph: Depending on the project proponent's future maintenance needs, an access break could be temporary or permanent.  Underground Design Option: The crossing at I-82 in this segment should be undergrounded as well.'	Clarifying text was added to the FEIS for Exit 11 use during construction and for maintenance and operation (Section 4.7.4.13 of the FEIS).  The undergrounding of NNR-4u at the I-82 crossing is discussed in Chapter 4, Section 7 (Section 4.7.4.13 of the FEIS).
Washington State Department of Transportation	99-R	'...Section 4.7.4.9 Route Segment MR-1, 2nd paragraph: The section of I-82 is designated as a Scenic Class A highway. Because of this designation, special design should be incorporated to minimize the visual impacts of the project.  A utility permit would be required...'	Clarifying text was added to the FEIS for a utility permit associated with MR-1 (Section 4.7.4.18 of the FEIS).  During the engineering and design phase of this proposed Project, Pacific Power (will work with agencies and private land owners to site structures and design the structure locations and routing to minimize impacts to resources through micro-siting.
Washington State Department of Transportation	99-S	'...WSDOT also provided their scoping comment letter dated March 8, 2010 as part of their comments on the SDEIS....'	This letter references WSDOT's concerns regarding the Desert Aire Airport and its proximity to a proposed alternative. This alternative was not carried forward as part of the alternatives considered in the DEIS. Impacts to aviation were addressed in the DEIS and SDEIS and will be carried forward into the FEIS (Sections 3.4.2.9 and 4.4.4 of the FEIS).

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS, Washington Fish and Wildlife Office	100-A	'...The Service requests the development of alternatives avoiding direct and indirect impacts to the JBLM YTC PAC....They recommend that Washington BLM follow the strategy for proposed right-of-way projects, as found in IM 2012-043: Greater Sage-Grouse Interim Management Policies and Procedures by developing alternatives that avoid the JBLM YTC PAC to the maximum extent possible. BLM has not demonstrated that avoiding impacts to the PAC is not feasible...'	<p>Action Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received. Action Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Complete avoidance of Greater Sage-Grouse impacts from the proposed Project is not feasible and practical based on the location of the existing substations and the objectives of the Pacific Power (Refer to Sections 3.3, 4.3, Appendix B-5, and Appendix B-6 of the FEIS for additional information regarding Sage-Grouse). Development of an Action Alternative that avoids the YTC PAC would be out of the scope of this proposed Project and not address the Pacific Power's need for the proposed Project.</p> <p>The Washington BLM is exempt from IM 2012-043. The IM states that the Washington State distinct population segment is not covered by IM 2012-043 and will be addressed through other policies and planning efforts (Refer to Sections 3.3, 4.3, Appendix B-5, and Appendix B-6 of the FEIS for additional information regarding Sage-Grouse).</p> <p>Note that upon consideration of the conservation measures put in place by state and federal agencies and private stakeholders to protect Sage-Grouse, USFWS determined in 2015 that range-wide listing under the ESA was not warranted for Sage-Grouse. Furthermore, USFWS determined that the Columbia Basin population did not constitute a DPS and did not warrant listing under the ESA.</p>
USFWS, Washington Fish and Wildlife Office	100-B	'....The current DEIS Agency Preferred Route to the south and east of JBLM YTC is not the best route for sage-grouse, since the southern section of the route passes within close proximity to historic breeding habitat and current habitat concentration areas and hinders dispersal to the southeast Rattlesnake Hills and Hanford Sage-Grouse Management Units. For these reasons the Service does not support selection of this route...'	<p>In BLM's deliberations to select the Agency Preferred Alternative for the proposed Project's FEIS, the decision-makers reviewed the DEIS and SDEIS documents, considered all of the Action Alternatives and their relative impacts on resources, preferences of the Cooperating Agencies and Tribal Representatives, and input received from the public via comments. The BLM has identified the NNR Alternative - Overhead Design Option as the Environmentally Preferred Alternative and has selected it as the Agency Preferred Alternative for the proposed Project.</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS, Washington Fish and Wildlife Office	100-C	<p>'...Although the Service typically favors co-location with existing structures causing disturbance, especially when the co-location is proposed at the narrowest possible centerline to centerline separation distance, the Service's assessment is that the existing Pomona-Wanapum 230 kV line already causes significant direct and indirect impacts to sage-grouse, including impacts to the JBLM YTC PAC. Figure 5, Time Series of Sage-Grouse Population Ranges (SDEIS), demonstrates a gradual southeastward shift in the JBLM YTC sage-grouse population range and core population, away from the Pomona-Wanapum Transmission Line corridor. In considering co-location of the new route with this existing transmission corridor, the FEIS should contain a broader evaluation of the ongoing impacts and opportunities to reduce impacts of the existing Pomona-Wanapum Transmission Line...'</p>	<p>Figure 5 displays the Greater Sage-Grouse Population trends based on available telemetry data from 1990 – 2007 (Appendix A). The population shift is believed to be a result current land use practices as well as habitat availability. The existing Pomona-Wanapum 230kV transmission line was built in the early 1970's and therefore would not likely be correlated to the telemetry data used in the EIS analysis. The SDEIS presents mitigation options for the proposed new transmission line, which includes additional mitigation for the existing Pomona-Wanapum 230kV transmission line (Refer to Sections 3.3, 4.3, Appendix B-5, and Appendix B-6 of the FEIS for additional information regarding Sage-Grouse). The FEIS has expanded on the cumulative effect analysis to clarify past actions such as the existing transmission lines and land use practices (Section 4.17).</p>
USFWS, Washington Fish and Wildlife Office	100-D	<p>'...The ROW grant for the existing line's crossing of the JBLM YTC PAC will expire in 2024.....co-located construction of the proposed Project with the existing line would complicate future options to better site and/or reduce impacts of the existing line. A commitment to bury sections of the NNR or any co-located lines surrounding JBLM YTC is critical in the long-term management of both new and existing co-located lines. This level of commitment is not evident in the SDEIS...'</p>	<p>The proposed Project under evaluation in this EIS has incorporated measures to minimize and reduce impacts as a result of the Action Alternatives under consideration. The existing Pomona-Wanapum 230kV transmission line has been accounted for in Chapter 3 as it is part of the existing condition as well as in the Cumulative Effects Section (Section 4.17) of the FEIS. Additional measures related to the existing Pomona-Wanapum 230kV transmission line are also presented as mitigation for certain resources (Chapter 4). Burying two route segments (identified by WDFW) of the proposed transmission line is a design option for the NNR Alternative analyzed in the SDEIS. This analysis has been carried forward and considered in the FEIS (See Chapter 2).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS, Washington Fish and Wildlife Office	100-E	'...Other than avoiding impacts altogether through an alternative route, undergrounding discrete sections of the NNR and co-location with the existing line, appear to be the most suitable of the current proposed alternatives. ...The NNR co-located route does have some improved consistency with the COT and Mitigation Framework.....however, the Service continues to recommend that an alternative be evaluated that avoids all sage-grouse priority habitat to the greatest extent...'	<p>Action Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received. Action Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Complete avoidance of Greater Sage-Grouse impacts from the proposed Project is not feasible and practical based on the location of the existing substations and the objectives of the Pacific Power. Development of an Action Alternative that avoids the YTC PAC would be out of the scope of this proposed Project and not address Pacific Power's need for the proposed Project (Refer to Sections 3.3, 4.3, Appendix B-5, and Appendix B-6 of the FEIS for additional information regarding Sage-Grouse).</p> <p>Note that upon consideration of the conservation measures put in place by state and federal agencies and private stakeholders to protect Sage-Grouse, USFWS determined in 2015 that range-wide listing under the ESA was not warranted for Sage-Grouse. Furthermore, USFWS determined that the Columbia Basin population did not constitute a DPS and did not warrant listing under the ESA.</p>
USFWS, Washington Fish and Wildlife Office	100-F	'...The following language should be included in the FEIS...."Each authorizing agency may utilize the final HMP to assess whether the applicant's proposed mitigation action complies with that agency's applicable laws, regulations, and government policies. The authorizing agencies will require inclusion of the HMP as a condition of approval for any grant of ROW, permit, or other required written approval and/or authorization. The final HMP will address Project impacts and compensatory mitigation across all land ownerships. Adopting the HMP to address impacts and mitigation actions across all land ownerships will be a condition precedent for all agencies' granting and continuing to authorize each agency's individual ROW. Should the proponent not follow through on the HMP for impacts accrued across any land ownership, each individual agency may suspend or terminate their individual ROW, regardless of which land ownership the inconsistency occurred upon."...'	<p>A revised version of this language was incorporated into the Project-Specific Framework for Development of a Sage-Grouse Compensatory Mitigation Plan (Appendix B-6 of the FEIS).</p>

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
USFWS, Washington Fish and Wildlife Office	100-G	'...The effects of the proposed action, while mitigated by conservation measures, are still anticipated to result in a net loss of shrub-steppe habitat and could result in the direct loss of individual sage-grouse, lek abandonment, and/or abandonment or loss of sage-grouse nests. Therefore, it is the Service's opinion that a formal conference should occur for this Project. BLM should prepare a Biological Assessment to evaluate the potential effects of the Project on sage-grouse...'	Section 7 of the ESA will be fully complied with. A BA will be prepared and the federal cooperating agencies and USFWS will formally consult on threatened and endangered species protected under the ESA. This process will begin following the selection of the FEIS Agency Preferred Alternative.
USFWS, Washington Fish and Wildlife Office	100-H	'...The Service remains concerned about the lack of protection afforded to migratory birds included in the SDEIS and the manner in which measures to minimize impacts to migratory birds have been formalized in the SDEIS....Due to the potential to affect avian resources which fully utilize the proposed Project location, the Service strongly advises a Project-specific Migratory Bird Conservation Plan (MBCP) be developed to minimize negative impacts associated with the construction and operation of the Project. The Service letter details important conservation commitments to include in the MBCP....'	A MBCP has been developed and included in the FEIS (Appendix B-8).
USFWS, Washington Fish and Wildlife Office	100-I	'...Many common raptors are still excluded from PDF BIO-13....Impacts to these common raptors should be addressed. The Service also suggests incorporating protective measures into the final Project designs to avoid bald eagle winter roosts, if identified along the proposed routes....'	BIO-13 specifies "any raptor species...." and thus covers common raptors (see page 2-60 in the SDEIS and Section 2.3.2 of the FEIS). BIO-13 covers bald eagle winter roosts; see page 2-061 in the SDEIS and Section 2.3.2 of the FEIS.
USFWS, Washington Fish and Wildlife Office	100-J	'...The Service recommends placing all mitigation-related commitments into an applicant-proposed MBCP that is specific to the Project and not just rely on commitments disclosed in the environmental analysis documents and the application of the broader company-wide Avian Protection Plan requirements....'	A MBCP has been developed and included in the FEIS (Appendix B-8).
USFWS, Washington Fish and Wildlife Office	100-K	'...The Service must emphasize that alternatives that would avoid impacts, or greatly reduce them through alternative power line alignments, to the JBLM YTC PAC should be fully evaluated. It has not been demonstrated that such alternatives are not feasible...'	Action Alternatives developed during scoping, and in the DEIS and SDEIS were designed to address issues raised by the public and agencies through comments received. Action Alternatives were developed to minimize impacts to human and natural resources to include Greater Sage-Grouse. Complete avoidance of Greater Sage-Grouse impacts from the proposed Project is not feasible and practical based on the location of the existing substations and the objectives of the Pacific Power (Refer to Sections 3.3, 4.3, Appendix B-5, and Appendix B-6 of the FEIS for additional information regarding Sage-Grouse). Development of an Alternative that avoids the YTC PAC would be out of the scope of this proposed Project and not address Pacific Power's need for the proposed Project.

**Table F2-2 Response to Non-Substantive Comments Received on Supplemental Draft EIS**

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Ableidinger-Walker, Katie	64-A	'I believe we have land located in the area that is going to be affected by this decision. The parcel number for the land is 191303-33402 and it's under the Robert Ableidinger Trust. My question is, how will our parcel be affected by this decision and when will the construction begin? Also, will we be compensated if you go through our property and how will it affect the cost of our property if we were to sell it?'	BLM responded on 1/5/2015 with a map showing the location of the proposed line and the parcel.  Pacific Power will purchase easements through negotiations with private landowners.
Stonemetz, Eric	65-A	'can you please send me a copy of where the line is going to be run on a map with actual roads on it. so I can tell if it is going to be over my property or along my property etc..'	BLM responded on 1/5/2015 to provide information requested on property and project location.
Mattawa Area News	66-A	'The new transmission line needs to go thru the Yakima Firing Range. Going thru farmland is not a good solution for the people of Grant County, especially since this power benefits Yakima County. The northern route is shorter and will disrupt less private land...'	Comment noted.
Eddie, Keith	67-A	'Put in the one crossing the firing center, it just makes sense.'	Comment noted.
Bozorth, Dorothy	68-A	'I like the new route that goes over the river and around the northern. I live on the other side by Burkett Lake. We already have three. I have one on one side and two on the other side. We don't need any more on our side. I live on Lower Crab Creek Road out of Beverly. So what else is there, that's pretty much it. I can't see if we put one more. I only have two acres. We're really tight there already.'	Comment noted.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Christensen, Robert Reed	69-A	'We have property under this 3C, adjacent to it...We are still very much against having it come down that way if we can somehow stop it, and would be very much in favor of going across the firing range...From the start, I thought that's what made sense. And they told us at that time that the Army just wasn't going to allow it. But the way they're talking out here now, apparently they have given in a little...We think that's where it should be. One of my worries about putting it on 3C is the fact that it would interfere with aerial spraying of crops. There's already too many power lines in that area and it's difficult for pilots to fly around those power lines, and one more would be just about the straw that broke the camel's back. And the other thing is, that I mentioned the last time, that our machinery keeps getting bigger, broader, and having those power lines along the edge of our fields, power poles is an obstacle that's hard for us a deal with because of the size of the equipment nowadays. The chances of accidents increase considerably. They wouldn't want us knocking their poles down. I'm highly in favor of the new proposal.'	Comment noted.
Eckenberg, James	70-A	'I prefer the north route, NNR-7 I believe is the new route, for the simple fact it makes common sense, being the roads are already there. And it's less impact to the public. The south route through the Wahluke Slope impacts the agriculture for the reasons of interfering with irrigation, interfering with crop dusting and adversely opposing homes. It goes over the top of a couple of houses. So basically I prefer to go on a different route out of where it does economical harm. Just common sense says a shorter route is better. Paralleling the existing power line on the north route makes common sense. The infrastructure is already there.'	Comment noted.
Ray, Pamalia	72-A	'My home is located between these two power transmission line....I totally object....The road and installation will wipe out an existing pasture with automatic underground irrigation that I have water rights for. And would require rearrangement of my fencing....I am in favor of the NNR Alternative.'	Comment noted.
Angel, Dick A. and Margie L.	73-A	'We are of the opinion that we pick the Sdeis NW alternative.'	Comment noted.
Yorgesen, Ronda	74-A	'I live along the Mattawa route which proposes the transmission line to go over a field on my property. I am against this route. The field is currently in asparagus and would be disruptive to our farming operation. In addition it is only a half mile from my house. We already have a major power line running within a half-mile on the other side of my house. I am in favor of the New Northern Route which has the most benefits. It is shorter and impacts people's lives the least.'	Comment noted.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Yorgesen, Kevin	75-A	'I am writing to give my support to the New Northern Route that has been proposed for the Vantage to Pomona Heights 230 kV Transmission Line Project versus the Mattawa Route. The New Northern Route is clearly the most economic choice as it is 40 miles shorter than the Mattawa Route. In Addition, taking the Mattawa Route would require either the purchasing or leasing of ground. It would also cause disruption to the farming along this route which would include practices such as crop dusting and management of the canal systems. I know that there is a concern for the Sage Hen habitat along the New Northern Route. As there is a power line already in existence along this route, adding an additional parallel power line should actually provide a corridor to better protect this habitat. I believe that the line could be installed with minimum impact to their habitat and in the end be beneficial. I strongly encourage that the New Northern Route be selected as the preferred route from Vantage to Pomona Heights. The disadvantages of the Mattawa Route far outweigh the advantages of the New Northern Route.'	Comment noted.
Gallacci, Jef	76-A	'My strong opinion is for the northern route versus the Mattawa area routes.'	Comment noted.
Yorgesen, Jerry	78-A	'...The northern route should be the primary option for the power lines. The northern route is shorter, should be less expensive, and doesn't travel over land that does not receive any of the electricity. The line option going over Mattawa will cross land that I currently farm. I do not want power lines interfering with my circle pivot irrigation. It should be the northern route, people are of more value than the 'worried about sage hen'. Use some common sense.'	Comment noted.
Martinez, Carol	79-A	'As a concerned landowner affected by the previously preferred power line routing south of the training center and passing through the Mattawa area, I heartily support the new northern route described in the above referred document. The NNR alternative with overhead power lines would appear to be the wisest choice from a tax payer and PPL customer perspective. Again, many of us are relieved that the NNR is being strongly considered. The southern route should no longer be seriously considered.'	Comment noted.
Yorgesen, David	80-A	'I am writing to support the New Northern Route for the Vantage to Pomona Heights transmission line. It is a shorter route and should be less expensive and would not further add to the desecration of the farm land in the Mattawa area. We already have enough power lines making it hazardous for spraying operations. Please give serious consideration to the merits of this northern route.'	Comment noted.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Wolff, Cheryl	82-A	'I live in South Grant County, WA State, specifically Desert Aire. I agree with the most desired route for the Transmission Line Project: On the West Side of the Columbia River, mostly on the Yakima Training Center. I disagree with the route that travels mostly through the Wahluke Slope Farmland. The Farmland route is detrimental to farming and to those living in the area.'	Comment noted.
Ray, Pamalia	83-A	'I am for the newest route for your power line that I have seen.'	Comment noted.
Ford, Albert C. and M. Lorene	84-A	'We approve the route following the old 230kv line.'	Comment noted.
Barela, Ron and Vickie	86-A	'We own a ranch at the end of Badger Pocket. In regards to the proposed transmission line, we support the route that crosses the Yakima Firing Range. It appears to be a more direct route therefore costing less. Also, we already have one power line crossing our pasture and most definitely do not want another one which would reduce our property value.'	Comment noted.
Diefenbach, Scott	87-A	'I agree with the SDEIS analysis and the advantages it identified that were associated with the NNR Alternative Route. -reduced overall transmission line length which would provide reduced resource impacts on several issues -reduced transmission line length across non federal lands; has less impact on land use, public health and safety, and other issues compared to the DEIS Alternative -reduced overall disturbance footprint; reducing resource impacts to wildlife habitat, military training, soils, water resources and other issues compared to the DEIS Alternative. Looking at the map the NNR is to the most logical route to take. It is shorter, it would have the least amount of resource impact. The DEIS Route would have a negative resource impact on the areas it would pass through. I appreciate the time spent by the parties involved in identifying the New Northern Route Alternative; that you will consider it as the preferred route.'	Comment noted.
Chott, Nancy	90-A	'If you have a more detailed map of 1a and 1b that shows road names I'd appreciate seeing it.'	BLM responded on 2/24/2015 to the information request on property and project location. BLM provided a detailed map and distance to parcel location from the line.

COMMENTS NAME	COMMENT ID	EXTRACTED COMMENT	RESPONSE
Grant County Washington	97-A	'...Grant County supports the NNR as its preferred alternative route for this redundant transmission line. The NNR would avoid the impacts outline by Grant County in its February 25, 2013 letter (enclosed). After reviewing the SDEIS, it is clear that the data and information related to the NNR demonstrate that the NNR generally will result in fewer impacts than the Agency Preferred Alternative identified in the original DEIS. The SDEIS clearly should result in the elimination of the original 'Agency Preferred Alternative' from further consideration...'	Comment noted.

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**DRAFT EIS  
PUBLIC COMMENT LETTERS AND RESPONSES**

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# HAYNES GEARHEART

Phone: 801 363 7373  
241 N Vine St #1005E  
Salt Lake City, Utah 84103

22 January 2013  
Salt Lake City, Ut. 84103

Bureau of Land Management  
Wenatchee Field Office  
9115 Walla Walla Ave  
Wenatchee, WA 98801-1521

ATTN: Mr. William Schurger, Project Manager  
Vantage to Pamona Heights Power Line 2850 ORW020  
WAOR 65753

Dear Sir:

Would you please send us a copy of the supporting document/s outlining all of the reasons for the A  
"Agency" preferring Alternative Route "D" for the Pacific Power Line Right of Way. We are enclosing a copy of  
page 2-9, Chapter 2, of the proposed action and alternatives showing the Preferred Alternative "D", about  
which we have concerns.

Would you also provide us with the name and address for the Project Manager supervising this project for B  
Pacific Power Company?

Thank you for your kind response to our requests.

Haynes Gearheart

Tele: 801-363-7373  
Fax: 801-410-4368  
E-Mail: chsegear@yahoo.com

Signed: *Clell Haynes Gearheart* and *Sylvia Gearheart*  
Clell Haynes Gearheart      Sylvia Gearheart

TABLE 2-2 ALTERNATIVE ROUTE COMPARISON SUMMARY

ROUTES	ALT. A	ALT. B	ALT. C	ALT. D (AGENCY PREFERRED ALTERNATIVE)	ALT. E	ALT. F	ALT. G	ALT. H
Route Segments	1a, 1b, 2a, 2b, 2d, 3a, 3c	1a, 1b, 2a, 2b, 2d, 3a, 3b	1a, 1b, 2a, 2c, 2d, 3a, 3b	1a, 1b, 2a, 2c, 2d, 3a, 3c	1a, 1c, 2a, 2b, 2d, 3a, 3b	1a, 1c, 2a, 2b, 2d, 3a, 3c	1a, 1c, 2a, 2c, 2d, 3a, 3b	1a, 1c, 2a, 2c, 2d, 3a, 3c
<b>Total Length (miles)</b>	<b>64.5</b>	<b>61.0</b>	<b>62.8</b>	<b>66.3</b>	<b>61.4</b>	<b>64.9</b>	<b>63.2</b>	<b>66.7</b>
<b>Ownership (miles crossed)</b>								
Bureau of Land Management	6.1	2.1	1.5	5.4	2.1	6.1	1.5	5.4
U.S. Fish & Wildlife Service	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Yakima Training Center	12.5	15.5	15.5	12.5	3.0	0.0	3.0	0.0
Bureau of Reclamation	5.4	1.7	1.7	5.4	1.7	5.4	1.7	5.4
<b>Total Federal Land</b>	<b>24.0</b>	<b>19.3</b>	<b>18.6</b>	<b>23.3</b>	<b>6.8</b>	<b>11.5</b>	<b>6.1</b>	<b>10.8</b>
State Land	0.0	0.0	1.0	1.0	1.0	1.0	2.0	2.0
Grant County Public Utility District	0.0	1.4	1.4	0.0	1.4	0.0	1.4	0.0
Private Land	40.1	39.9	41.4	41.6	51.8	52.0	53.3	53.5
Water	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4
<b>County (miles within county)</b>								
Yakima	38.6	1.0	50.5	40.3	49.1	39.0	50.9	40.7
Kittitas	0.0	9.5	9.5	0.0	9.5	0.0	9.5	0.0
Benton	3.1	0.7	0.7	3.1	0.7	3.1	0.7	3.1
Grant	22.8	2.2	2.2	22.8	2.2	22.8	2.2	22.8
<b>Parcels and Landowners</b>								
Number of Parcels Crossed	139	115	136	160	186	210	192	231
Number of Private Landowners	45	23	23	46	68	90	68	90
Miles of Agricultural Land Potentially Affected	2.7	0.0	1.5	4.2	0.2	2.9	1.7	4.4
Miles of PacifiCorp Existing Distribution Rights	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6
Miles of Paralleling Existing Transmission	6.7	2.2	10.8	15.3	2.2	6.7	10.8	15.3

Notes: Alt. = Alternative

# HAYNES AND SYLVIA GEARHEART

Phone: 801 363 7373  
241 N Vine St #1005E  
Salt Lake City, Utah 84103

RECEIVED

FEB 05 2013

Bureau of Land Management  
WFO, Wenatchee, WA

Jan 29, 2013

Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, WA 98801-1521

Attn: Mr. William Schurger, Proj Mgr.  
Vantage to Pomona Heights EIS  
2850 ORW 020  
WAOR 65753

Dear Sir:

Thank you for the cd we received from you on January 8, 2013, containing the EIS on the above project. Though we have not read all of the statements on the cd, it appears that the concerns for the farm land owners and farmers receive the least consideration for their overall welfare and operation efficiency.

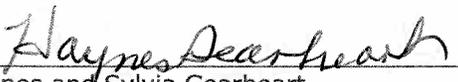
The whole situation with the current attitudes of the various organizations submitting their statement almost totally ignores that human beings - the people that make our society and nation work - ought always to be considered first and foremost.

We do not oppose the construction of the power line that will bring additional power to the Yakima Valley by the shortest and least harmful path possible, such as alternative "B" or "C" would provide. The alternative "D" favored by the BLM people appears to be totally opposed to direct and efficient power line constructions and operations, especially when considering all the rights-of-way needed to implement the actual construction and including the roads that may be required according to the EIS information on the disc we received. A

We have taken the opportunity to include in this letter a copy of our letter written in reply to an invitation from the BLM as written by them in their letter dated January 14, 2011, on this particular and same project

Our opinion written 2 years ago is still valid, and still represents our current concerns.

Thank you.

  
Haynes and Sylvia Gearheart



Jan 14, 2011

Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, WA 98801-1521

ATTN: Vantage to Pomona Heights EIS

Dear Sirs:

We respectfully oppose the alternative "N" Road Routes A and B regarding the Vantage to Pomona Heights 230 KV transmission line. There are several reasons for our opposition. First: the Wahluke Slope irrigation blocks were designed for pivot irrigation systems, and along those two proposed power lines every post or tower needed to support the lines will negatively impact those efficient systems. Second: It is a well established fact that land in these irrigation units that have power line poles or towers located within the irrigated circle areas are discounted in value. Third: The probable compensation offered by Pacific Power would not come close to a fair price for the inconvenience and problems incurred while trying to farm around the poles in the years ahead. Fourth: There appears to be no compelling reason to add 6 miles of additional lines to cross some of the most productive agricultural land in the State of Washington.

Portions of the Southern Routes (Southern YTC Routes 2 and 3, and Southern Routes 2 and 3) located just east of Mattawa were eliminated due to potential impacts to existing agricultural uses. Why do not the same types of impacts apply to the "N" Road Routes A and B? It appears there is a double standard being applied to these two situations.

While there are specific problems involved in each of the alternative routes, the Railroad Routes (ROW) A and B, there would certainly be reduced negative impacts than to the use of the Road N Routes. Due to the topography, lay of the land, present usage, and value of the Railroad Routes there would indeed not be the horrific impacts that would be involved in the other routes.

We sincerely believe that the Railroad (ROW) Routes would be the most efficient selection for the new power line. It is believed that it would also be the shortest and most direct line to the Vantage power station, and certainly would have no influence on any devaluation of the properties involved with the N Routes A and B.

May we urge those directly involved in the decision-making to look at all the issues affecting the route of the new line, to consider all issues carefully - short term, long term, financial, irreparable damage to prime agricultural lands.

Like others who are giving voice to this, we are long-time owners of Units 74 and 66, Blk 253 along N Rd. Both of these units would be adversely affected. We are old now, and retired from active farming, but we do depend on those units to provide for our retirement income. We also have spent our lives building up, practicing conservation of these precious lands, caring for them, knowing that there will be no more created. We know that, as long as other routes can be used more effectively with less harm, we should voice our concerns. Please accept this letter in that light. Thank you for giving us the opportunity to do so.

Sincerely,

Haynes and Sylvia Gearheart

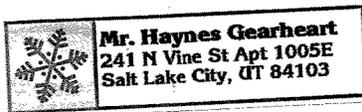
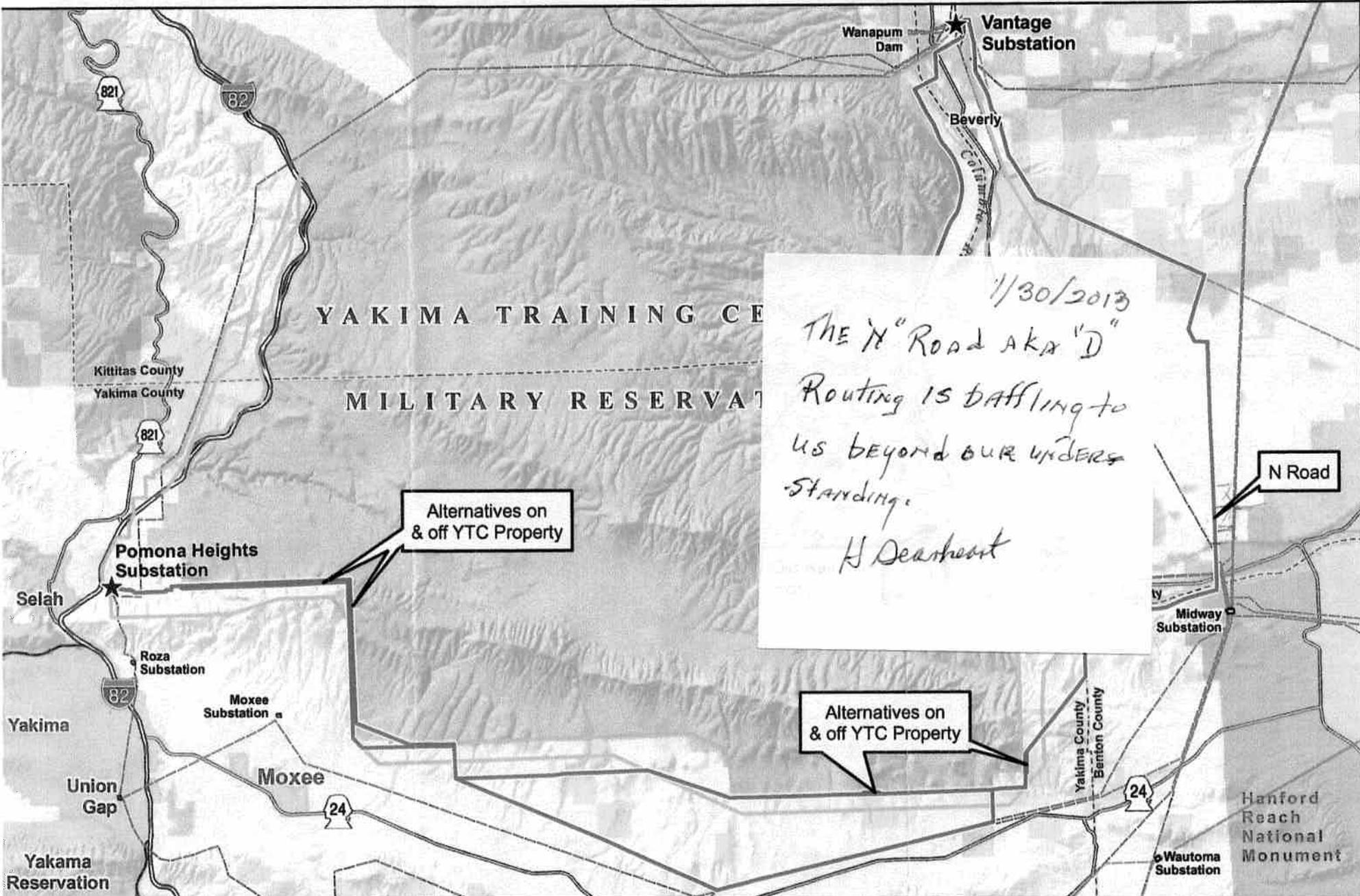


TABLE 2-2 ALTERNATIVE ROUTE COMPARISON SUMMARY

ROUTES	ALT. A	ALT. B	ALT. C	ALT. D (AGENCY PREFERRED ALTERNATIVE)	ALT. E	ALT. F	ALT. G	ALT. H
Route Segments	1a, 1b, 2a, 2b, 2d, 3a, 3c	1a, 1b, 2a, 2b, 2d, 3a, 3b	1a, 1b, 2a, 2c, 2d, 3a, 3b	1a, 1b, 2a, 2c, 2d, 3a, 3c	1a, 1c, 2a, 2b, 2d, 3a, 3b	1a, 1c, 2a, 2b, 2d, 3a, 3c	1a, 1c, 2a, 2c, 2d, 3a, 3b	1a, 1c, 2a, 2c, 2d, 3a, 3c
Total Length (miles)	64.5	61.0	62.8	66.3	61.4	64.9	63.2	66.7
<b>Ownership (miles crossed)</b>								
Bureau of Land Management	6.1	2.1	1.5	5.4	2.1	6.1	1.5	5.4
U.S. Fish & Wildlife Service	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Yakima Training Center	12.5	15.5	15.5	12.5	3.0	0.0	3.0	0.0
Bureau of Reclamation	5.4	1.7	1.7	5.4	1.7	5.4	1.7	5.4
Total Federal Land	24.0	19.3	18.6	23.3	6.8	11.5	6.1	10.8
State Land	0.0	0.0	1.0	1.0	1.0	1.0	2.0	2.0
Grant County Public Utility District	0.0	1.4	1.4	0.0	1.4	0.0	1.4	0.0
Private Land	40.1	39.9	41.4	41.6	51.8	52.0	53.3	53.5
Water	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4
<b>County (miles within county)</b>								
Yakima	38.6	1.0	50.5	40.3	49.1	39.0	50.9	40.7
Kititas	0.0	9.5	9.5	0.0	9.5	0.0	9.5	0.0
Benton	3.1	0.7	0.7	3.1	0.7	3.1	0.7	3.1
Grant	22.8	2.2	2.2	22.8	2.2	22.8	2.2	22.8
<b>Parcels and Landowners</b>								
Number of Parcels Crossed	139	115	136	160	186	210	192	231
Number of Private Landowners	45	23	23	46	68	90	68	90
Miles of Agricultural Land Potentially Affected	2.7	0.0	1.5	4.2	0.2	2.9	1.7	4.4
Miles of PacifiCorp Existing Distribution Rights	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6
Miles of Paralleling Existing Transmission	6.7	2.2	10.8	15.3	2.2	6.7	10.8	15.3

Notes: Alt. = Alternative



Vantage - Pomona Heights 230kV Transmission Line Project

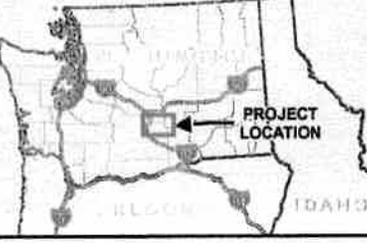
# Routes and Jurisdiction

Project Features	Transportation	Land Ownership
Alternative Route	Interstate Highway	Bureau of Land Management
Eliminated Route	US Highway	Bureau of Reclamation
Project Substation	State Highway	State of Washington
<b>Existing Transmission</b>	<b>Base Features</b>	U.S. Fish and Wildlife Service
500 kV Transmission	County Boundary	Washington Department of Fish and Wildlife
230 kV Transmission	Municipality	Yakama Reservation
Substation		Yakima Training Center

0 0.5 1 2 3 4 5 6 7 8  
 Miles  
 1 inch = 4 miles

**PACIFIC POWER**  
 A CH2M HILL COMPANY

**POWER ENGINEERS**



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# Draft Environmental Impact Statement Comment Form

Jan/Feb 2013

## Vantage to Pomona Heights 230 kV Transmission Line Project

The Bureau of Land Management (BLM) is seeking written comments on the Draft Environmental Impact Statement for the proposed 230 kV transmission line. Comments on the DEIS should be as specific as possible. It also would be helpful if comments referred to pages, chapters, and/or sections of the DEIS. Comments may address the adequacy of specific analyses in the DEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

For all comments submitted, please identify whether you are submitting them as an individual or as the designated spokesperson on behalf of an organization. All comment submittals must include the commenter's name and address.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment-including your personal information-may be made publically available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

**Name** WILLIAM A. MAPLES  
**Address** POB 525  
**City/State/Zip** MAPLE 95936  
**Affiliation/Organization (if any)** Maples Cattle Ranch  
**E-mail Address** \_\_\_\_\_  
**Phone #** 509-453-2048

**Please note the categories that apply to you:**

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Study Area
- Organization Representative

**Please provide comments on the DEIS. Additional information and space is provided on the back of this form.**

① The "preferred line route" will impact our use of grazing, use of our corrals and pens; passage to creek water for cattle and ability to use the private property as necessary to conduct our business. We feel bordering the UTC lessens impact on business. Furthermore, we have sections for home sites that will be adversely affected by the line through our sections.

A

B

C

② Additionally, why isn't the existing →

Please provide additional comments you may have on the project:

Line break along the YTC already  
protects the Sage grouse. We have  
never seen a Sage grouse on the  
proposed route - so I guess they  
don't cross the break? D

Thank you

*Thank you for your participation*

Please leave your completed form at the comment table  
at the public meeting or mail to:

BLM Wenatchee Field Office,  
Attn: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

**For additional information:**

Online at:

[www.blm.gov/or/districts/spokane/plans/vph230.php](http://www.blm.gov/or/districts/spokane/plans/vph230.php)

Project contact: (509) 665-2100

Project e-mail address:

[OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

*Please specify Vantage to Pomona Heights Project in  
the subject line of the email*



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# Draft Environmental Impact Statement Comment Form

Jan/Feb 2013

## Vantage to Pomona Heights 230 kV Transmission Line Project

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For all comments submitted, please identify whether you are submitting them as an individual or as the designated spokesperson on behalf of an organization. All comment submittals must include the commenter's name and address.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment-including your personal information-may be made publically available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name Ray Riser may  
Address 13505 S.W. Rd 25  
City/State/Zip Matthew, W.V. 99349  
Affiliation/Organization (if any) \_\_\_\_\_  
E-mail Address RRISER@SMWiReless.net  
Phone # 509-830-5129

Please note the categories that apply to you:

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Study Area
- Organization Representative

A This forum showed that the participating agencies put more emphasis on protecting sage hens and cultural sites that could be protected from damage; than on the lives of farmers who have their livelihood and their personal safety put at risk by the placing of this (3C) route.

B wherever the power poles are placed in a farm unit, it will impact the circle irrigation system causing the farmer to have to make unnecessary alterations to his farm.

If you are truly serious about not

Please provide additional comments you may have on the project:

C *causing unnecessary impact, why don't you listen to the people who will be impacted instead of a bunch of sage hens and buried cultural sites.*

*Thank you for your participation*

Please leave your completed form at the comment table at the public meeting or mail to:

BLM Wenatchee Field Office,  
Attn: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

**For additional information:**

Online at:

[www.blm.gov/or/districts/spokane/plans/vph230.php](http://www.blm.gov/or/districts/spokane/plans/vph230.php)

Project contact: (509) 665-2100

Project e-mail address:

[OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

*Please specify Vantage to Pomona Heights Project in the subject line of the email*



# Draft Environmental Impact Statement Comment Form

Jan/Feb 2013

## Vantage to Pomona Heights 230 kV Transmission Line Project

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Name JEF WALLACE  
Address 22889 RD P.8 SW  
City/State/Zip WADSWORTH WA 99349  
Affiliation/Organization (if any) \_\_\_\_\_  
E-mail Address JEGWALLACE@GMAIL.COM  
Phone # 509 840 4004

Please note the categories that apply to you:

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Study Area
- Organization Representative

Please provide comments on the DEIS. Additional information and space is provided on the back of this form.

ON THE PROPOSED ROUTE, <sup>30</sup>

THE LINE'S TOWERS WILL

IMPOSE DRAMATICALLY ON

A THE PRIVATE AIRSTRIP OF BOB

CHRISTENSEN, AS WELL AS

THE HOMES OF JUSTIN

CHRISTENSEN AND JESSOP

BEALING. FURTHER, PROPERTIES

ALONG THE ROUTE BETWEEN

RD 24 SW AND ROAD 29 SW

UNDER AERIAL CROP DUSTING

HAVE BEEN THE CUSTOMARY

B METHOD OF APPLYING PRODUCT

FOR AGRICULTURE, WILL BE

NO LONGER CANDIDATES FOR

CREATIVE CROP DUSTING.

C MY OPINION IS THAT THE

R/R RIGHT OF WAY ALONG

THE RIVER WOULD IMPACT

THE ARI-ECONOMIC

ENVIRONMENT NOT AT ALL.

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# Draft Environmental Impact Statement Comment Form

Jan/Feb 2013

## Vantage to Pomona Heights 230 kV Transmission Line Project

The Bureau of Land Management (BLM) is seeking written comments on the Draft Environmental Impact Statement for the proposed 230 kV transmission line. Comments on the DEIS should be as specific as possible. It also would be helpful if comments referred to pages, chapters, and/or sections of the DEIS. Comments may address the adequacy of specific analyses in the DEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

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Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment-including your personal information-may be made publically available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

**Name** Joe Balmelli  
**Address** 132 Newaykun Valley Rd  
**City/State/Zip** Chewatis Wn. 98532  
**Affiliation/Organization (if any)** \_\_\_\_\_  
**E-mail Address** 1311@sipnsearch.com  
**Phone #** 360 448 8248

**Please note the categories that apply to you:**

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Study Area
- Organization Representative

**Please provide comments on the DEIS. Additional information and space is provided on the back of this form.**

ARE YOU SAYING THAT CULTURAL  
RESOURCES IS MORE IMPORTANT  
THAN THE SAFETY AND WELL BEING  
OF THE MANY PEOPLE AFFECTED  
BY YOUR PREFERRED ROUTE  
THE RESOURCES CAN BE PROTECTED  
AS THEY DID ON MY PROPERTY  
WITH THE WAY TO A LINE.  
YOU HAVE TO REALIZE THE  
HARDSHIP THESE FARMERS FACE  
WITH THESE OBSTACLES IN THEIR  
FIELDS

A

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## Vantage to Pomona Heights EIS

Phil Hull <PhilH@zirklefruit.com>

Wed, Feb 6, 2013 at 9:30 AM

To: wschurge@blm.gov

Cc: Leslie Griggs <lgriggs@gcpower.net>, Harold Austin <HaroldA@zirklefruit.com>, Scott Cluff <ScottC@zirklefruit.com>

Bill,

I was unable to use the email or the online posting feature. It could be a problem with our server here, not sure. Below are my comments. Please submit them for me. Thank you.

Comments regarding the proposed Vantage - Pomona Heights 230 kV Transmission Project:

A Zirkle Vineyards operates a wine grape vineyard along the proposed route of the proposed transmission line. Alternative route 3c near Beverly would cross over the vineyard. The portion of the vineyard impacted by the proposed transmission line is located in the SE 1/4 of the SE 1/4 of Section 27, Township 16N, Range 23E. On the map in the EIS ("Agriculture & Irrigation, page 5 of 5") the wine grape vineyard is incorrectly labeled as a blueberry field. Any transmission line spanning the vineyard would need to accommodate the operation of our harvesting machinery,  
B which is 14 feet tall. Also, the transmission line would need to span the width of the vineyard so that the placement of a new tower would not require the removal of grape plants. Our vineyard is approximately 450 feet wide at the point proposed alternative route 3c crosses over the vineyard.

Zirkle Vineyards is opposed to any transmission line that would not allow us to operate under the wires or placement of towers that necessitate the removal of vineyard acreage.

Zirkle Vineyards, c/o Zirkle Fruit Company, P.O. Box 190, Selah, WA 98942

Phil Hull, Rainier/Zirkle Fruit Co.

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# Draft Environmental Impact Statement Comment Form

Jan/Feb 2013

## Vantage to Pomona Heights 230 kV Transmission Line Project

The Bureau of Land Management (BLM) is seeking written comments on the Draft Environmental Impact Statement for the proposed 230 kV transmission line. Comments on the DEIS should be as specific as possible. It also would be helpful if comments referred to pages, chapters, and/or sections of the DEIS. Comments may address the adequacy of specific analyses in the DEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

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Name Jerry Yorgesen  
Address 15555 Rd 25 SW  
City/State/Zip Mattawa WA 99349  
Affiliation/Organization (if any) \_\_\_\_\_  
E-mail Address JYorgesen@yahoo.com  
Phone # 509 932 5246

**Please note the categories that apply to you:**

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Study Area
- Organization Representative

Please provide comments on the DEIS. Additional information and space is provided on the back of this form.

A The shortest and most logical path would be to follow the existing Pomona-Wanapum 230kv Line. The  
B Most logical of preferred routes would be 3b. This is shorter and has less impact on numerous property owners. In ~~the~~ this issue would be taken care of already. They are logical. You would think that the government would want to use existing government land instead of trying to take away private Land. Use common sense and be logical!  
unfortunately infrastructure in the u.s.A. has come to a stop. when or will they ever build another hydroelectric Dam? Not with today's government and lawyers.

Please provide additional comments you may have on the project:

The Government regulations requires the building of this electric line, - shouldn't the government use there land instead of property own by private property?

*Thank you for your participation*

Please leave your completed form at the comment table at the public meeting or mail to:

BLM Wenatchee Field Office,  
Attn: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

**For additional information:**

Online at:

[www.blm.gov/or/districts/spokane/plans/vph230.php](http://www.blm.gov/or/districts/spokane/plans/vph230.php)

Project contact: (509) 665-2100

Project e-mail address:

[OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

*Please specify Vantage to Pomona Heights Project in the subject line of the email*

**RECEIVED**

FEB 07 2013

Bureau of Land Management  
WFO, Wenatchee, WA

Vic Jansen  
P.O. Box 574  
Moses Lake, WA 98857

February 7, 2013

FAX: 509-665-2121

Attention: Vantage to Pomona Heights EIS Project Manager

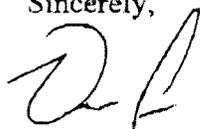
I have no issues with the proposed line as long as it is not closer to my existing Airport, nor higher than the existing lines (marked with balls) as they relate to the extended centerline west of my Airport.

A

Also, Zirkle Fruit Co. transferred an easement to me, a 60' radius on the SE corner of Section 27 and I would not want poles or guy wires to interfere with that area.

If it helps my neighbor to the North, Zirkle Fruit Co., you could place poles near the north side of my property.

Sincerely,



Vic Jansen  
509-766-1542

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From: **Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Date: Fri, Feb 8, 2013 at 9:23 PM  
Subject: Fw: Re: Mailing List for Vantage to Pomona Heights EIS  
To: [OR Wenatchee Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

--- On **Thu, 4/8/10**, **Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)> wrote:

From: Larry and Zongqi Alton <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Subject: Re: Mailing List for Vantage to Pomona Heights EIS  
To: [William\\_Schurger@or.blm.gov](mailto:William_Schurger@or.blm.gov)  
Date: Thursday, April 8, 2010, 3:18 PM

Dear Mr Schurger,

I recieved the maps of the power lines and our property from John Aniello and Sarah Doering on Tuesday 4/6/10. Thank you for your efforts to provide timely information on this.

A I was very disappointed to see that the power line routes run right along our property line through this residential area. There seems to be a minor jog in the lines that routes the lines right thru the Yakima Ranches properties.

I understand you are making adjustments to this route, possibly going thru the firing center which would avoid this area. I believe this would be a much better environmental and esthetic solution.

I would like to know if there is anything I can do to help you with this new solution. I could contact other owners in the Yakima Ranches Association for support. I'm sure you all are doing your best to find a different appropriate route. Please let me know how this route change is proceeding.

my address is:  
larry alton  
453 hawthorne ave #a  
palo alto, ca 94301

Thank You!

Larry Alton

--- On **Thu, 4/8/10**, [William\\_Schurger@or.blm.gov](mailto:William_Schurger@or.blm.gov) <[William\\_Schurger@or.blm.gov](mailto:William_Schurger@or.blm.gov)> wrote:

From: [William\\_Schurger@or.blm.gov](mailto:William_Schurger@or.blm.gov) <[William\\_Schurger@or.blm.gov](mailto:William_Schurger@or.blm.gov)>  
Subject: Mailing List for Vantage to Pomona Heights EIS  
To: [lalton@pacbell.net](mailto:lalton@pacbell.net)

Date: Thursday, April 8, 2010, 10:03 AM

Dear Mr. Alton,

Please provide your address so I can add you to the mailing list. We are not maintaining an email list.

Sincerely,

William Schurger  
Realty Specialist  
Bureau of Land Management  
Wenatchee Field Office  
509/665-2100

Larry and Zongqi  
Alton  
<[lalton@pacbell.net](mailto:lalton@pacbell.net)> To  
et> [OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)  
cc  
04/07/2010 11:07  
AM Subject  
Vantage to Pomona Heights EIS

Please add me to your mailing list.

Thank You,

Larry Alton

From: **Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Date: Fri, Feb 8, 2013 at 9:16 PM  
Subject: Fw: Vantage to Pomona Heights EIS-Larry Alton Parcel 201305-24001  
To: [OR Wenatchee Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)  
Cc: dave and janine <[travelmann2c@comcast.net](mailto:travelmann2c@comcast.net)>

--- On **Fri, 2/4/11**, **Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)> wrote:

From: Larry and Zongqi Alton <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Subject: Vantage to Pomona Heights EIS-Larry Alton Parcel 201305-24001  
To: [OR Wenatchee Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)  
Date: Friday, February 4, 2011, 8:45 PM

Dear Sirs,

- A Another concern we have about this power line near our property is the health damage to residents on our property from the radiation emitted from this power line.

Thank You,

Larry Alton  
453 hawthorne ave #A  
Palo Alto, CA 94301  
650-387-6814

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From: **Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Date: Fri, Feb 8, 2013 at 9:27 PM  
Subject: Fw: yakima ranches power line  
To: [OR Wenatchee Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)  
Cc: dave and janine <[travelmanm2c@comcast.net](mailto:travelmanm2c@comcast.net)>

--- On **Sun, 7/18/10, Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)> wrote:

From: Larry and Zongqi Alton <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Subject: yakima ranches power line  
To: "Larry Alton" <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Date: Sunday, July 18, 2010, 11:16 AM

Dear Congressman 'Doc' Hastings (R) (202) 225-3251 – FAX

We would greatly appreciate your help in guiding the routing of the Vantage to Pomona Heights power line away from the residential Yakima Ranches properties and into the firing center acreage.

I received the maps of the power lines and our property from John Aniello ([John.Aniello@PacifiCorp.com](mailto:John.Aniello@PacifiCorp.com)) and BLM ([William\\_Schurger@or.blm.gov](mailto:William_Schurger@or.blm.gov)).

A I was very disappointed to see that the power line routes run right along our property line through this residential area. There seems to be a minor jog in the lines that routes the lines right thru the Yakima Ranches properties.

I understand they are considering making adjustments to this route, possibly going thru the firing center which would avoid this area. I believe this would be a much better environmental and aesthetic solution.

This property was purchased by my parents many years ago for family use. It was named after my mother "Violet Acres". She passed away a few weeks ago at 97 years old. The family will be very upset if a power line is routed along the property destroying the aesthetics, environment and value of this inheritance. Fortunately my mother did not have to witness such a monstrosity.

Please contact the BLM and PacifiCorp to assist in routing thru the firing center or a more northerly route.

Thank you,

Larry Alton and The Alton  
family

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FEB 08 2013

Bureau of Land Management  
WFO, Wenatchee, WA

# Draft Environmental Impact Statement Comment Form

Jan/Feb 2013

## Vantage to Pomona Heights 230 kV Transmission Line Project

Please provide comments on the DEIS. Additional information and space is provided on the back of this form.

The Bureau of Land Management (BLM) is seeking written comments on the Draft Environmental Impact Statement for the proposed 230 kV transmission line. Comments on the DEIS should be as specific as possible. It also would be helpful if comments referred to pages, chapters, and/or sections of the DEIS. Comments may address the adequacy of specific analyses in the DEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

For all comments submitted, please identify whether you are submitting them as an individual or as the designated spokesperson on behalf of an organization. All comment submittals must include the commenter's name and address.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment-including your personal information-may be made publically available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name Guy Jock WARDEN  
Address P.O. Box 99  
City/State/Zip Royal City, WA 99357  
Affiliation/Organization (if any) Flying Business owner  
E-mail Address hoosmoyjock@sunwireless.net  
Phone # 509-346-2417

A

I ATTENDED AND COMMENTED  
@ THE MATANAWA FEB. 6<sup>th</sup> MEETING.  
YOU STATED IN YOUR COVER  
LETTER AND ALSO THE PRESENTERS  
DID MANY TIMES WHO THE COOPERATING  
AGENCIES WERE. IN MY VIEW AND  
HAVING HEARD ALL THE INPUT BY  
YOUR PRESENTERS, THE U.S ARMY  
- I.E. (JBLM YTC) WAS NOT A  
COOPERATING AGENCY!  
IT SEEMED TO MOST OF  
US THERE THAT IF A NEW 230KV  
LINE IS NEEDED FOR THE YAKIMA  
AREA (NO BENEFIT TO GRANICO!)  
THEN THE OBVIOUS SHORTEST  
ROUTE IS FOLLOWING THE EXISTING  
POMONA-WANAPUM LINE THROUGH  
THE ARMY RANGE. THE ARMY'S  
NEGATIVE STANCE IS DEPLOABLE,  
AND Citing SECURITY CONCERNS,  
SAFETY OF TRAINING PILOTS IS  
RIDICULOUS! THE SAFETY, EVEN

Please note the categories that apply to you:

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Study Area
- Organization Representative

Please provide additional comments you may have on the project:

MODE REDUNDANT AN ISSUE, AS THERE ARE EXISTING LINES ALL THROUGH THE NORTHERN PART OF THE RANGE. AND WHAT'S MORE ALL THESE LINES ARE MARKED AT NIGHT WITH RED LIGHTS! AS A FORTY PLUS YEAR LOCAL AERIAL AGRICULTURAL SPRAYING PILOT AND BUSINESS OWNER WE HAVE WORKED OVER AND UNDER, AND ROUND POWER LINES FOR YEARS, AND IT WOULD BE NICE IF THEY WERE ALL MARKED AS WELL AS THE LINE OVER THE RANGE!

I DID HEAR AND UNDERSTAND THE NEED FOR THIS ADDITIONAL LINE, BUT THE EIGHT CHOSEN OPTIONS, WITH OPTION 'D' AS PREFERRED MAKE NO SENSE. IF THE ARMY SAYS NO, AND THERE IS NO HIGHER POWER TO OVER RIDE THEM, THEN IN MY OPINION THE ONLY ALTERNATIVE IS "NO ACTION".

*Thank you for your participation*

Please leave your completed form at the comment table at the public meeting or mail to:

BLM Wenatchee Field Office,  
Attn: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

**For additional information:**

Online at:

[www.blm.gov/or/districts/spokane/plans/vph230.php](http://www.blm.gov/or/districts/spokane/plans/vph230.php)

Project contact: (509) 665-2100

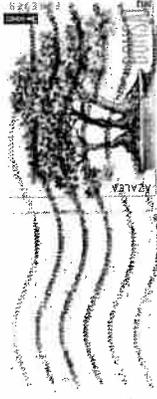
Project e-mail address:

[OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

*Please specify Vantage to Pomona Heights Project in the subject line of the email*



**ROYAL FLYING SERVICE, INC.**  
 PROFESSIONAL FLYING AND FIELD SERVICE  
 BOX 99  
 ROYAL CITY, WA 99357



PASCO WA 99301  
 FEB 28 1981

ATM  
 BLM WENATCHEE FIELD OFFICE  
 VANTRAP TO PAMONA HEIGHTS EIS  
 915 WALLA WALLA AV.

WENATCHEE

WA 98801-1521

98801-1521



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From: **Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Date: Sat, Feb 9, 2013 at 1:16 PM  
Subject: Fw: Re: Project mailing list and public meeting attendees- Vantage to Pomona Heights  
EIS-Larry Alton Parcel 201305-24001  
To: [OR Wenatchee Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)  
Cc: dave and janine <[travelmanm2c@comcast.net](mailto:travelmanm2c@comcast.net)>

From: [William Schurger@blm.gov](mailto:William_Schurger@blm.gov) <[William\\_Schurger@blm.gov](mailto:William_Schurger@blm.gov)>  
Subject: Re: Project mailing list and public meeting attendees  
To: "Larry and Zongqi Alton" <[lalton@pacbell.net](mailto:lalton@pacbell.net)>  
Date: Thursday, September 2, 2010, 7:49 AM

Dear Mr. Alton,

Because of the Privacy Act, the BLM cannot release the names and addresses of individuals who are on the project mailing list or attended the public meetings back in February. You have the option of making a written (not email) Freedom of Information Act (FOIA) request to the BLM Oregon/Washington State Office, but in order to protect their privacy, it is highly unlikely that any information for individuals would be released. The address for the Oregon/Washington State Office can be found at the following link:

<http://www.blm.gov/or/index.php>

In regards to your August 24, 2010 email regarding a public meeting, the analysis of this project is behind schedule and a date for the proposed meeting has not been set. Notification of any future meeting will be sent by mail.

Sincerely,

William Schurger  
Realty Specialist  
Bureau of Land Management  
Wenatchee Field Office  
509/665-2100

Larry and Zongqi

Alton

To <[lalton@pacbell.n](mailto:lalton@pacbell.net)  
et> [William\\_Schurger@or.blm.gov](mailto:William_Schurger@or.blm.gov)

cc  
09/01/2010 05:02

PM  
Subject  
Project mailing list and public  
meeting attendees

Dear Mr Schurger,

Confirming the voice mail that I left you today, I need your mailing list  
A for the power line project and the attendance list for the recent public  
meetings on this project. Please include any email addresses or phone  
numbers that you have.

Thank You,

Larry Alton

From: **Larry and Zongqi Alton** <[lalton@pacbell.net](mailto:lalton@pacbell.net)>

Date: Sat, Feb 9, 2013 at 12:05 PM

Subject: Vantage to Pomona Heights EIS-Larry Alton Parcel 201305-24001

To: [OR Wenatchee Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

Cc: dave and janine <[travelmann2c@comcast.net](mailto:travelmann2c@comcast.net)>

Dear Sirs,

A You need to schedule another open season for comments on the subject power line because your undated letter recieved 1/11/13 is not clear about the real email address for comments and emails addressed to the apparent address are returned as undelivered.

Thank You,

Larry Alton

453 hawthorne ave #a

Palo alto, ca 94301

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RECEIVED

BURK WAHLUKE ENTERPRISES  
608 W Division Ave.  
Ephrata, WA 98823  
February 8, 2013

FEB 11 2013  
Bureau of Land Management  
WFO, Wenatchee, WA

BLM Wenatchee Field Office  
Attn: Vantage to Pomona Heights EIS  
915 Wall Walla Avenue  
Wenatchee, WA 98801-1521

Ref: Vantage to Pomona Heights 230 kV Transmission Line Project

Dear Sirs:

I attended your Mattawa **Draft Environmental Impact Statement (DEIS)** forum on the 230 kV Transmission Line Project. Presentations were handled well in what could have been a hostile environment.

What I heard from those providing comments at that meeting is that **the residents, landowners and Wanapum Indians do not want an additional transmission line on the Wahluke Slope.** They expressed a lot of good reasons for not wanting to encumber their premier farm ground, their residences and environment with additional transmission towers and lines. The transmission line is an **unwanted intrusion** on the Wahluke Slope. I strongly agree with what I heard from those willing to express themselves.

A It is clear that **landowners do not and Grant County does not receive any benefit from placement of this transmission line on Wahluke Slope.**

Those that do benefit from added power reliability are unwilling or unable to contribute their finances or property to the project adding significant cost in added miles of transmission line. The benefits derived from this transmission line go to Pacific Power customers in Yakima, Selah and the Yakima Military Firing Center.

Present alternatives indicate that the end-to-end transmission line routes range from 61 – 67 miles. **My suggestion is to string the transmission line between Selah and the John Day Dam approximately 80 miles in a direct line.** That would put the transmission line in areas most likely to benefit from the added reliability.

  
Douglas E. Burk, Partner  
Owner of Unit 14, Block 251 CBIP

Cc: Grant County Commissioners

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**RECEIVED**  
 FEB 11 2013  
 Bureau of Land Management  
 WFO, Wenatchee, WA

**Draft Environmental  
 Impact Statement  
 Comment Form**  
 Jan/Feb 2013

**Vantage to Pomona Heights 230 kV  
 Transmission Line Project**

The Bureau of Land Management (BLM) is seeking written comments on the Draft Environmental Impact Statement for the proposed 230 kV transmission line. Comments on the DEIS should be as specific as possible. It also would be helpful if comments referred to pages, chapters, and/or sections of the DEIS. Comments may address the adequacy of specific analyses in the DEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

For all comments submitted, please identify whether you are submitting them as an individual or as the designated spokesperson on behalf of an organization. All comment submittals must include the commenter's name and address.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment-including your personal information-may be made publically available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

**Name** GARY W LOGSTON  
**Address** 200 HARRISON HGTS RD.  
**City/State/Zip** SELAH WA 98942  
**Affiliation/Organization (if any)** \_\_\_\_\_  
**E-mail Address** \_\_\_\_\_  
**Phone #** 509-698-5502

**Please note the categories that apply to you:**

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Study Area
- Organization Representative

■ Please provide comments on the DEIS. Additional information and space is provided on the back of this form.

THIS COMMENT SUBMITTED  
BY PROPERTY OWNER.  
I HAVE LEGITIMATE CONCERNS  
ON THE PLACEMENT OF POWER  
LINE STRUCTURES, NEAR OR ON MY  
PROPERTY, INCLUDING THE TOWERS  
OR POLES AND THEIR SUPPORT  
CABLES. THE CONCERN IS HOW THIS

- A AFFECTS ACCESS TO THE PROPERTY  
AND SAGE TRAIL RD, INCLUDING  
FUTURE USE AND MAINTENANCE OF  
SAID ROAD AND THE OBSCURING
- B OF THE VIEW. ANOTHER DEEP
- C CONCERN IS THE DROP IN VALUE  
OF THE PROPERTY!  
SEE ATTACHED MAP OF  
PARCEL.

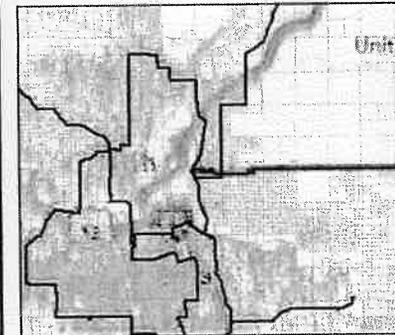
\_\_\_\_\_  
Gary W Logston  
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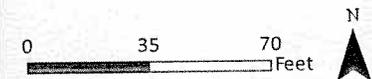
19130521411  
 Gary W &  
 Jan L Logst

Gary W & Jan L Logst  
 19130521411

Vantage - Pomona Heights  
 Transmission Line



- Owned Parcel
- Transmission Line
- Vantage-Pomona Heights Transmission Line
- Approx. Transmission Line Right of Way 125ft
- Parcels



GIS Support Services  
 Solutions Group  
 gisdept@pacificorp.com

Data is projected in  
 State Plane Washington South

No Warranty. With respect to any information, including but not limited to the Confidential Information, which a Party furnishes or otherwise discloses to another Party for the purpose of evaluating Compliance, it is understood and agreed that the Disclosing Party does not make any representations or warranties as to the accuracy, completeness or fitness for a particular purpose thereof. It is further understood and agreed that no Party or its representatives shall have any liability or responsibility to another Party or to any other person or entity resulting from the use of any information so furnished or otherwise provided pursuant to this Agreement.



Schurger, William <wschurge@blm.gov>

---

## FW: Scan From lct17kmc3601

1 message

---

**Aniello, John** <John.Aniello@pacificcorp.com>

Tue, Feb 12, 2013 at 3:56 PM

To: "Schurger, William C (wschurge@blm.gov)" <wschurge@blm.gov>

Cc: "Darrin Gilbert <darrin.gilbert@powereng.com> (darrin.gilbert@powereng.com)" <darrin.gilbert@powereng.com>

Bill,

I'm not sure exactly what the protocol is for this issue but the gentleman that wrote the attached letter spoke to me and wants his comments in the official comments for the EIS. He also wants a copy of the EIS. I think we can easily mail him a disk but how do I help him make sure these comments make the official list? He said he's written you two letters; one last year and one this year. Both are basically parroting the letter I have attached.

Can you confirm that you have received them and if so that you are considering them part of the official comments that will be addressed. Alternately if you have not seen them or are not considering them part of the official comments what direction do I give him. He said his internet has been down for a long while (since December I think he mentioned) so should I mail him one of the written forms?

Also he mentioned that he was unaware of the public meetings. I explained what went on, what was said (roughly), answered his questions as we did at the meetings, and told him you had extended the public comment period through March 8<sup>th</sup>.

*Thanks,*

*John Aniello*

**From:** Aniello, John

**Sent:** Tuesday, February 12, 2013 3:47 PM

**To:** Aniello, John

**Subject:** Scan From lct17kmc3601

---

**HAYNES AND SYLVIA  
GEARHEART**

**Phone:** 801 363 7373  
241 N Vine St #1005E  
Salt Lake City, Utah 84103

30 January 2013

Mr. John Aniello  
Sr Engineering/OPS Project Manager  
PACIFIC POWER  
825 N E Multnomah  
Suite 1700  
Portland, Oregon 97232

Dear Mr. Aniello:

Thank you for the information sent us dated Jan 23, 2013. It would perhaps be most helpful if you would take the time to send us a copy of all of your documentation supporting your preferred Alternative "D" re the Vantage to Pomona Power Line project.

A Your selection has caused us great concern since it affects our two farm units - #s 74 and 66 in Block 253, Columbia Basin Irrigation project. We want to know why you would want to cause the greatest negative impact on the people and their farm operations in some of the most productive and valuable farm land in the state of Washington.

We note from your letter that the BLM is running interference for Pacific Power. Just what is the current relationship between Pacific Power and the BLM, a Federal Agency? If Pacific Power is paying the BLM for the work that will take place, is BLM also available to do work for the affected land owners to represent and protect their interests? Why is most all the information distributed to the public slanted in favor of Pacific Power and its choices?

We ask that you do not enter upon our farm units until we are satisfied with your documented answers.

Thank you.

*Haynes Gearheart Sylvia Gearheart*  
Haynes and Sylvia Gearheart

RECEIVED

FEB 12 2013

Bureau of Land Management  
WFO, Wenatchee, WA

ATTENTION: Vantage to Pomona Heights EIS Project Manager

My name is Lynn J. Gearheart and I own farm units 48 and 65 in Block 253. I loudly and vociferously object to the proposed Vantage to Pomona Heights EIS transmission line 3C.

I cannot believe that anyone would be short-sighted enough to build this transmission line going through the finest and most valuable agricultural farmland in Washington State, if not the whole United States.

- A This transmission line would seriously affect a considerable group of farm units. It could cause costly replacements of current irrigation systems. It would seriously affect the value of the property because of increased production costs as well as actual loss of productive ground due to placement of towers and the huge right-of-way.
- B Consider the danger to acrial applicators applying chemicals essential to maintaining crop production in this area.

Could persistence in pursuing the 3C portion of this transmission line evolve into legal action?

  
Lynn J. Gearheart  
2972 Redrock Ridge Loop  
Richland, Wa 99354

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RECEIVED

FEB 12 2013

Bureau of Land Management  
WFO, Wenatchee, WA

TO: Linda Coates Markle  
BLM - Wenatchee

From: Tom Guderian  
Farm Owner

Re: Vantage - Pomona Heights Transmission Line

1. Pacific Power's Legat stated the cost to go through farmland at Mattawa was double that of other routes. It is likely to exceed twice the costs considering R/W and other costs.

2. The Mattawa farmland route will damage present and future economic values in an area that  
A has exceptional potential because of land quality, water and climate (growing season).

3. Specific Problems and Consequences

a) Power transmission lines devalue all property near them, both the land and building sites.

A - A home would be extremely devalued, perhaps given no value by a prospective purchaser. No one would want to live under or near a power transmission line.

B - Any disruption of an irrigation cycle devalues its economic value and desirability to farm operators. Notwithstanding today's promises by administrators of the right of ways for operation and maintenance, stricter rules can be  
B applied in the future that will hinder farming operations.

- b) The danger from transmission lines to crop dusters is real. Compliance with FAA regulations sounds good, but is not adequate to protect the lives of Pilots who fly with varying loads and conditions to meet required farming schedules.  
c) The repetitive nature of flying a fixed  
contributes to the risk.

#### 4. Other factors in the choice of routes.

a) The position taken by the Mattawa Indians must be considered of course. If this route was chosen, everything possible would be done to mitigate any damages to the location of artifacts. While respect can be shown Indians whose ancestors may have had a connection to and used the area of artifacts, Mattawa area farmers and others today are living, investing, raising families and making a success of an area that will provide job growth and economic benefit to the nation.

b) Power transmission lines, which will be permanent and more intrusive because of their size, should not run adjacent to main arterial roads that will need to be improved as traffic increases in the area. These roads are where farm commercial development will occur.

c) There is not much to say regarding the Yakima Firing Center route. The Mattawa farm route is likely to be three times the cost considering a doubling of the line and right of way and devaluation costs.

D Have all avenues in arriving at a route with the U.S. Army been exhausted?

d) It comes to mind that the farmers and others in the Mattawa area are the only entities with an economic and personal interest in the project who receive no benefits from the project and who are not represented by a federal government agency.

The BLM is the only hope for people who are directly affected by choices related to the project.

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February 12, 2013

BLM Wenatchee Filed Office

Attn: Vantage to Pomona Heights EIS

915 Walla Walla Avenue

Wenatchee WA 98801

RE: Vantage to Pomona Heights 230 kV Transmission Line Project

Dear BLM Wenatchee Field Office:

I am submitting my comments as an individual person. I own Farm Unit 24 in Block 251 in the South Columbia Irrigation District. I strongly protest you wanting to build a power line down the East side of my farm unit for the following reasons:

A -You need approx 125 feet of right of way which will require me to shorten my irrigation circle the same amount. Who would pay for the cost of reducing my circle?

B -By reducing my circle, I will lose about 23.7 acres of production. A circle next to me is renting for \$550 per acre. This translates in me losing a minimum of \$13,000 in income should I rent my property out. Raising a crop would translate into more of a loss of income to me. Does this mean you would compensate me \$13,000 a year for this right away? Also this loss in income would have to be adjusted over time for inflation.

-There is a house that is on the South East Corner of my farm unit. It looks like your right of way would take out his house. Even if you didn't, it sure would be bad to have those power lines so close to his house. Would you like it if a Power Company put a power line over your home?

Sincerely,

Robert Diefenbach

1600 Payne Road

Ellensburg WA 98926

Non-Resident Property Owner

e-mail: [rgdief@gmail.com](mailto:rgdief@gmail.com)

Phone: 509-968-9682

From: **Robert Gibbs** <[Robert.Gibbs@pcli.com](mailto:Robert.Gibbs@pcli.com)>  
Date: Fri, Feb 15, 2013 at 9:05 AM  
Subject: Vantage to Pomona Heights EIS  
To: "[or\\_wenatchee\\_mail@blm.gov](mailto:or_wenatchee_mail@blm.gov)" <[or\\_wenatchee\\_mail@blm.gov](mailto:or_wenatchee_mail@blm.gov)>  
Cc: "[pclidoc@msn.com](mailto:pclidoc@msn.com)" <[pclidoc@msn.com](mailto:pclidoc@msn.com)>

To Whom it Concerns,

- A I am writing to you in support of the Agency Preferred Route as presented at the meeting in Selah, WA on 2-05-13. Specifically I and surrounding property owners support section "1b".

Sincerely,

Robert Gibbs

11157 Mieras Road

Yakima, WA 98901

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From: Neil Christensen <[neilchristensen@outlook.com](mailto:neilchristensen@outlook.com)>  
Date: Mon, Feb 18, 2013 at 9:23 PM  
Subject: Vantage to Pomona Heights EIS  
To: "[blm or wn mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)" <[blm or wn mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)>

Bureau of Land Management,

I am writing to express my opposition to the currently "preferred route" which includes segments 3c and 2c of the Vantage - Pomona Heights Transmission Line Project.

Concerning Segment 3c:

A There are already 4 major power transmission lines running through the Wahluke Slope farmland area. Yet another line would mar the landscape and raises serious safety issues for agricultural spray pilots of both airplanes and helicopters.

B The power line would pass just 0.4 miles East of the approach end of our family runway along road 26 S.W. For the last several years we have been waiting for the right financial opportunity to lengthen the runway to allow larger airplanes to land on it. One member of our family already owns an airplane too large to land on the runway, so it is just a matter of time before we make the move to lengthen it to accommodate larger planes. This power line would restrict our freedom to develop our business intentions for the future, part of which includes lengthening our runway.

Please refer to my attached letter to our U.S. Senators and associated U.S. Representatives for further comment.

Concerning Segment 2c:

Segment 2c runs right through the proposed Black Rock Dam and Reservoir area.

C I know there are those who say the Black Rock Reservoir project will never happen, but just this week Governor Jay Inslee called for legislation to enact the Department of Ecology to find solutions to the Yakima River's over-allocated water supply. The Black Rock Dam and Reservoir is not dead yet, and many still say it is the most viable answer to the situation. To place a power line through that area would mean further waste in the future if it has to be moved to make way for the reservoir.

There are other power transmission routes that are still feasible, they just haven't been pursued to the extent necessary to enact them.

We need to involve more political figures in finding and accessing the most logical route for this transmission line.

Please find attached a letter which further details my concerns and calls for help from our U.S. political leaders.

I also intend to write to our state representatives and Governor Inslee, as well as the Department of Ecology, the Senate Committee on Agriculture, the House Ag Committee, those associated with overseeing the Yakima River Basin Water Resource Management Plan, the Yakima Basin Storage Alliance, Friends of Bumping Lake, and Trout Unlimited.

I believe all of these entities will be interested in preserving the safety and further development of irrigated farmland that segments 2c and 3c of the current “preferred route” for this power line obstruct.

Let’s get together and put this power line where it makes the most sense.

Sincerely,

Neil R. Christensen  
P.O. Box 998  
Mattawa, WA 99349  
509 840-7000  
[neilchristensen@outlook.com](mailto:neilchristensen@outlook.com)

From the Desk of  
**Neil R. Christensen**  
P.O. Box 998  
Mattawa, WA 99349

February 12, 2013

Congressman Hastings, Congressman Reichert, Senator Cantwell, & Senator Murray,

Pacific Power (PP), is preparing to construct a power transmission line from the Wanapum Dam, Grant County, WA to Selah, WA. The natural course, and PP's preferred route, would be nearly straight west from the dam to Selah. However, this route would cross the U.S. Army's Yakima Training Center (YTC). There is already a power transmission line traversing the YTC and this new line would run directly parallel to it.

PP sought permission to run the new line parallel to the existing line. The army said they would approve the new line if PP would bury both the existing line and the new one. PP says that would 10X the cost of the project and would be prohibitive.

Now, PP's preferred route is directly through the heart of the Mattawa farming area. There are already 4 major power transmission lines traversing the Mattawa farming area. They run approximately 3 miles apart from each other. This new proposed route would run in between the 2 innermost lines (one of which is composed of a set of 3 lines running 3 towers wide through the land). This would create a situation where we will have major power transmission lines running less than 1.5 miles apart from each other. Another transmission line in such close proximity would truly mar the landscape.

The danger for agricultural spray pilots alone should cause major concern for this route. We have agricultural airplane pilots fly the very area of the proposed route on a daily basis nearly all summer long. More than one helicopter pilot has been killed hovering over cherry orchards following rainstorms at harvest time in the Wenatchee area in the last few years as a result of hitting power lines. More acres of cherries are being planted in the Mattawa area and more will be planted in the future. A private plane crashed in Sunnyside this past week because it hit powerlines. A number of years ago a small plane carrying biologists hit power lines crossing the Columbia River south of Mattawa and crashed in the very area this line would cross the river. All pilots in the Mattawa area are truly concerned.

D

The new line would run less than 100 feet from at least 8 residences, one of which is my son's home. It would also run just 0.4 miles off of the approach end of our family's runway which has been in continuous use for 38 years.

E

The route through the farming area would increase the length of the line from approximately 38 miles to 67 miles in length with costs increased proportionately. It would also run through the area where the Black Rock Reservoir is proposed.

I am writing to ask if you can help reason with the U.S. Army. The military inherited the existing line through the YTC when they annexed a portion of land north of the original boundary of the YTC. I can understand they don't want any power lines running through the training center, however, the fact is, there is already a line running through the center. And if they are concerned about safety, two transmission lines running parallel to each other are more visible than one and would take up almost no extra footprint.

Unfortunately, we are a little under the gun on this subject. The Bureau of Land Management held a meeting here in the Mattawa area last Thursday, and the deadline for commentary is February 17<sup>th</sup>. They sent out some form of communication to local land owners previously, but I don't think anyone around here thought a transmission line running from Wanapum Dam to Selah had anything to do with Mattawa area farmland. I'm not sure when they will make the final decision on the placement of the line. I think they wanted to make the decision a year ago.

Would you be able to have any influence on the Yakima Training Center's position?

Hope to hear from you.

Sincerely,

Neil R. Christensen  
President, Sun Slope Farms, Inc. (A family farming corporation)  
neilchristensen@outlook.com  
509 840-7000

Contacts:

Bureau of Land Management  
Randall  
509 665-2100  
blm\_or\_wn\_mail@blm.gov

Pacific Power  
John Aniello  
503 813-6030

RECEIVED

FEB 19 2013

Electric File # 2631314

Bureau of Land Management  
WFO, Wenatchee, WA

A There is no clear way of knowing  
were the proposed Power line from Pannona  
Mts. to Sage Trail, as the roads on the  
proposed line map are not clearly  
defined.

As a property owner in this  
area, we should be informed as to were  
exactly were this power line route is  
located, and were its location is.

We have a power line on our property.  
Electric File # 2631314 -

The property around these power lines  
are rendered useless, and we also have a  
gas pipeline which make more ground  
un-useable.

Therefore as a property owner we  
should- (must) be advised to the route  
of this proped power line.

B We would like to know if there  
will be any compensation for the  
un-useable land.

For these reason our family are  
against this proposed power line.

The Kelley Family  
Melvin Kelley  
Patricia Kelley  
[1308 Almo Rd.  
Yakima WA 98901]

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From: **Mark Roy** <[markr@royfarms.com](mailto:markr@royfarms.com)>  
Date: Mon, Feb 18, 2013 at 10:33 AM  
Subject: Vantage to Pomona Hts. EIS  
To: [blm or wn mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)

Roy Farms, Inc.  
401 Walters Rd.  
Moxee, WA. 98936

509.452.3494

2/15/13

RE: Vantage to Pomona Hts. EIS

To: Linda Coats-Markle, Field Manager

We are writing to comment on the proposed 230k V transmission line that will be built in the Moxee Valley Area.

A We own properties in the Zone 1 West area, bordering the SW corner of the Firing Center. We are in favor of the 1b route ( rather than the 1c) that goes thru the Firing Center rather than thru our properties.

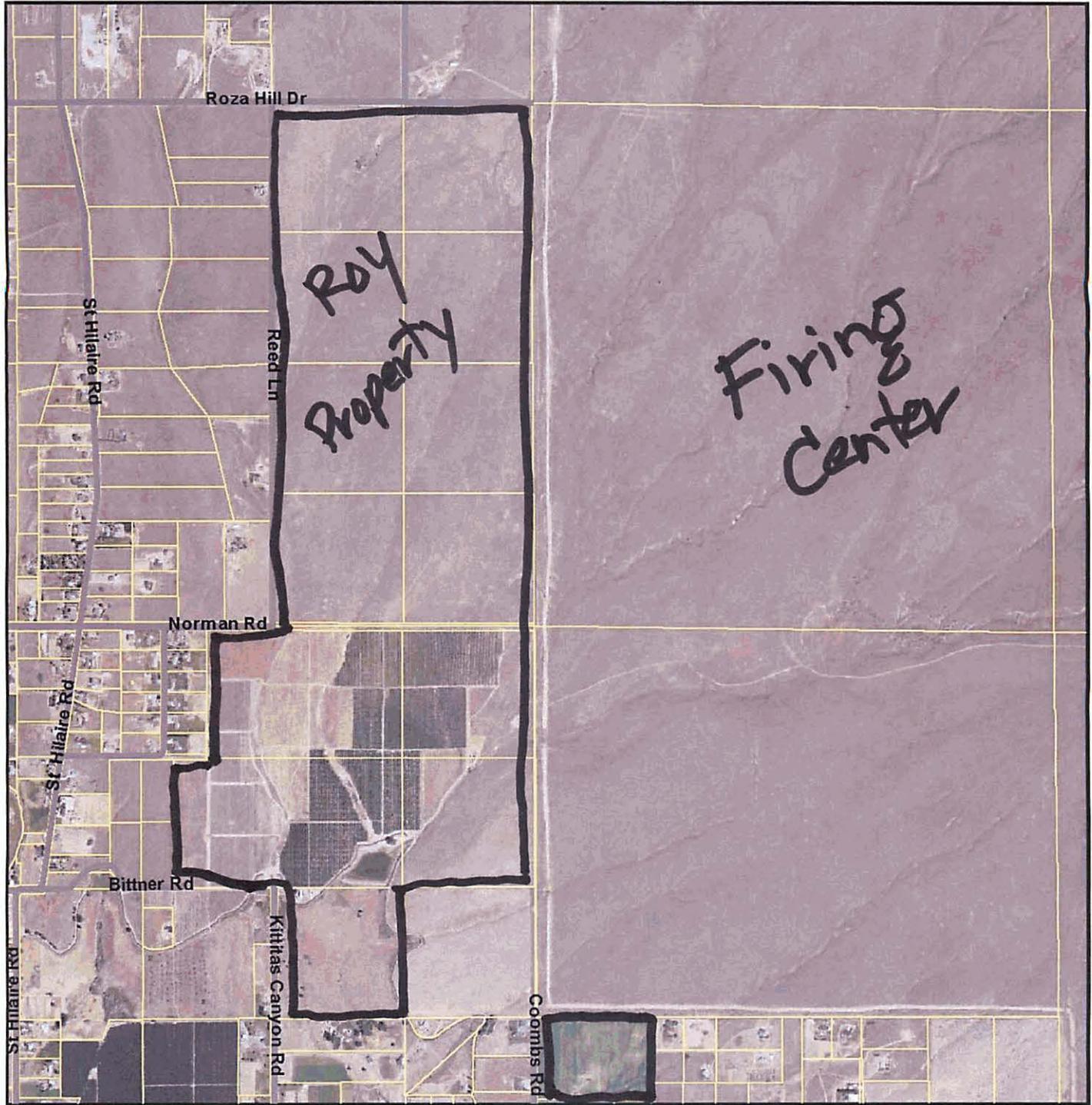
B We are concerned about the economic impact that the line causes in our farming activities and also the devaluation of the property for future developments that will some day include housing. There is also concern for the electro magnetic influence for existing homes and for  
C their families that have been built in that area. We will be limited on what farming and  
D development activities if  
E the proposed routes goes thru our properties, not to mention the visible impact that the transmission will cause on the quality of life for those that live in the area.

Would it not be less of an environmental impact if your proposed route follows the inside boundary of the Firing Center along that Zone 2 South the entire route? The Firing Center has existing roads and  
F fire breaks maintained that could be the road access for the new transmission line. There is concern about the Sage Grouse and its habitat and since there is this existing road already in the Firing Center, it would make the most sense to use the existing route rather than scar up the land and take up valuable farm land and Sage habitat for your easements.

Please notify me if you have any other questions.  
See attached maps that show our company parcels and it's impact on our lands.

Sincerely,

Mark Roy  
Vice President  
Roy Farms, Inc.



2011 Ortho Photography

Map Center: Range:20 Township:13 Section:21

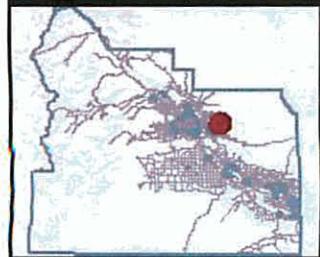
City Limits  
 Sections

[WWW.YAKIMAP.COM](http://WWW.YAKIMAP.COM)  
 Yakima County GIS  
 128 N 2nd Street  
 Yakima, WA 98901  
 (509)574-2992



One Inch = 1600 Feet  
 Feet    1000    2000

Roy Properties



MAP AND PARCEL DATA ARE BELIEVED TO BE ACCURATE, BUT ACCURACY IS NOT GUARANTEED; THIS IS NOT A LEGAL DOCUMENT AND SHOULD NOT BE SUBSTITUTED FOR A TITLE SEARCH, APPRAISAL, SURVEY, FLOODPLAIN OR ZONING VERIFICATION

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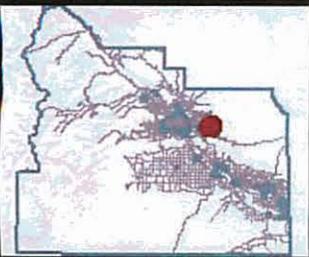
Mark Roy  
 Roy Farms, Inc.  
 Moxee, WA

452-3494



Map Center: Range:20 Township:13 Section:28

2011 Ortho Photography



City Limits  
 Sections

Roy Properties

[WWW.YAKIMAP.COM](http://WWW.YAKIMAP.COM)

Yakima County GIS  
 128 N 2nd Street  
 Yakima, WA 98901  
 (509)574-2992



One Inch = 1200 Feet

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Printed On: 2/18/2013 10:06:53 AM

Mark Roy  
 Roy Farms, Inc.  
 Moxee, WA

452-3494

From: **Kene Larson** <[kene@larsonfowles.com](mailto:kene@larsonfowles.com)>  
Date: Tue, Feb 19, 2013 at 4:59 PM  
Subject: Vantage to Pomona Heights EIS comment  
To: [blm or wn mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)

Kene Larson  
Larson Fowles PLLC  
821 E. Broadway Ave. #8  
Moses Lake, WA 98837  
(509) 765-6700

*The contents of this message are confidential and protected by the attorney / client relationship. If you are not the intended recipient, please reply to this e-mail and advise of the unintended delivery, and delete this e-mail from your computer*



LARRY W. LARSON  
DWAYNE C. FOWLES  
MITCHELL J. HEAPS  
KENE C. LARSON

*kene@larsonfowles.com*

February 19, 2013

BLM Wenatchee Field Office  
Attn: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, WA 988801-1521

***Re: Vantage to Pomona Heights Transmission Line Project***

To Whom It May Concern:

Please be advised we are the attorneys representing Scott R. Diefenbach and the purpose of this letter is to formally comment on the Vantage to Pomona Heights Transmission Project. Mr. Diefenbach formally opposes the Agency's preferred route, which would force construction of power lines in front of his residence.

Mr. Diefenbach is a property owner east of the town of Mattawa, 14002 Road 25 SW (tax parcel no. 211461002). Mr. Diefenbach resides on the parcel and raises chickens and horses. The Agency's preferred route (3c) for the power lines runs north/south on the east side of the property. Because the Agency is requesting one hundred twenty five (125) feet west of said line, the power lines would cut directly in front of Mr. Diefenbach's residence. (See enclosed maps).

Mr. Diefenbach is firmly opposed to the Agency's preferred route for the following reasons:

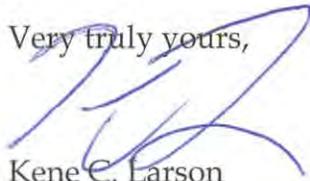
- A • The construction may result in restricted access to his driveway and residence.
- B • The power lines are aesthetically unappealing and will severely
- C decrease the value of his property.
- D • The power lines are a danger to the health of the humans and animals residing on the property.

E None of these concerns are addressed in the Draft Environmental Impact Statement. The DEIS is over one thousand (1,000) pages, touching on everything from cultural and native American concerns to socioeconomic and environmental justice. However, nowhere in the document does the Agency discuss the impact and interference with individual landowners whose properties will be upended by the power line construction. The present proposal for the power lines would be an absolute upheaval of Mr. Diefenbach's living situation.

There is currently no easement authorizing power lines over and across Mr. Diefenbach's property. He was informed at the public meeting that Pacific Power will have to enter into individual agreements with property owners for access. Mr. Diefenbach has no intention of voluntarily agreeing to any such easement.

F There are alternatives to the Agency's preferred route. There is an option that follows the river bed that completely bypasses individual property owners. Mr. Diefenbach encourages the Agency to choose this alternative, or some other route that avoids his residence.

Very truly yours,



Kene C. Larson

Enclosure

cc: Client  
Grant County Commissioners  
Washington District 13 Legislators



Vantage - Pomeroy Heights  
 230 KV Transmission Line Project  
**Agriculture & Irrigation**  
 Page 4 of 5

**Legend**

- Alternative Route
- Road Node
- Study Corridor (2 miles)
- Agriculture Types**
- Apple
- Apricot
- Cherry
- Alfalfa Hay
- Green Hay
- Timothy Hay
- Concord Grape
- Wine Grape
- Apricots
- Field Corn
- Green Pea
- Onion
- Potato
- Wheat
- Malbar - Unknown
- Field Let
- Irrigation Method**
- Center Pivot
- Hand-Miscible Sprinkler
- Wheel Line
- Drip
- Big Gun
- Dryland
- Unknown
- Irrigation Infrastructure**
- Pump Station
- Buried Drain Manhole
- Buried Drains
- Waterway Line
- Flood
- Unknown
- Existing Transmission Facilities**
- 500KV Transmission Line
- 230KV Transmission Line
- 115KV Transmission Line
- Boundaries
- County
- Level Line
- Waterway Line
- Open Drain Line
- Open Water Pond
- Canal ROW Area
- Interstate Highway
- US Highway
- State Highway
- Local Access Road

**Page Index**

**Map Information**

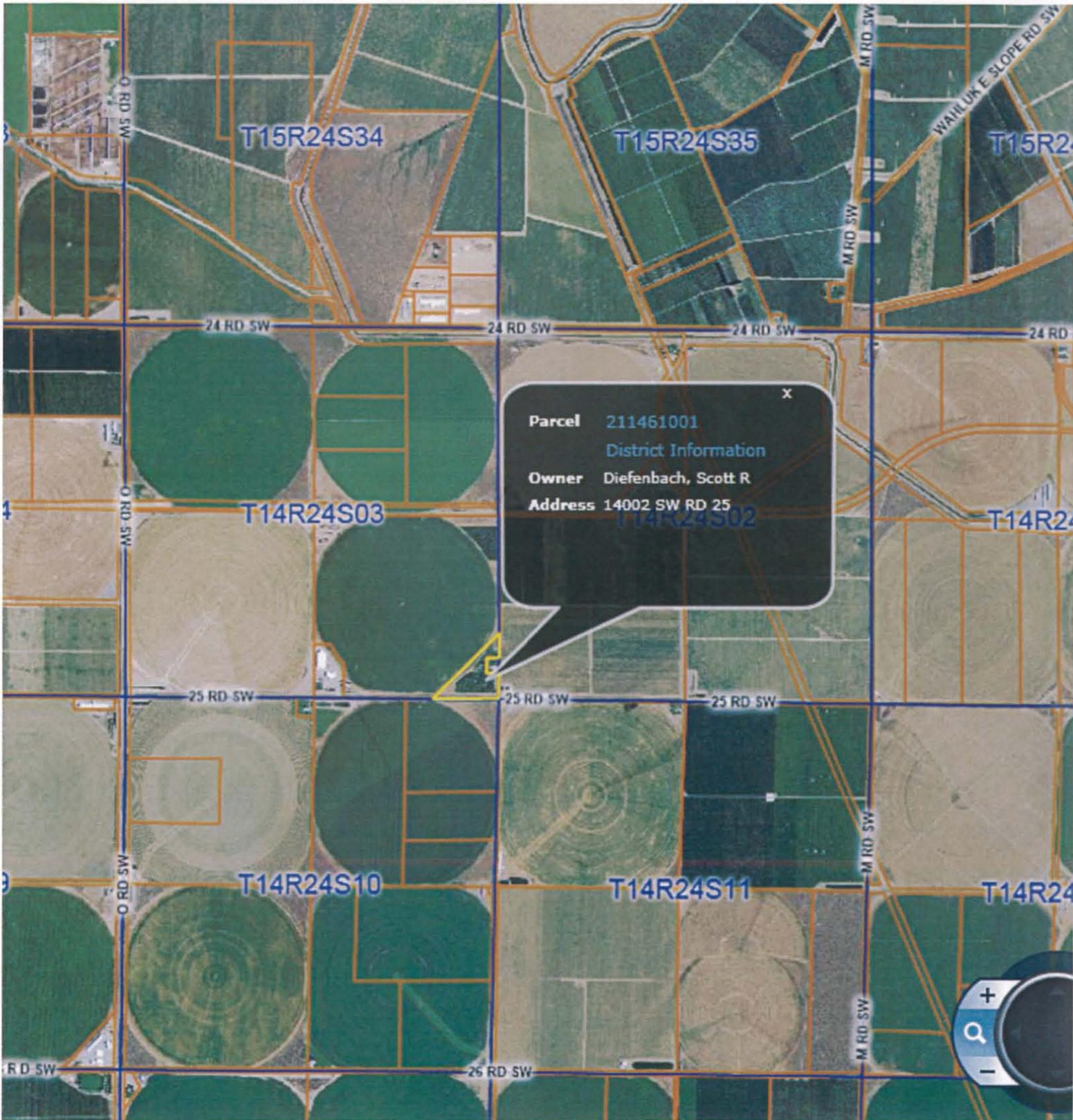
Scale: 0 to 0.75 Miles

North Arrow

Map of Oregon showing Project Location

Logo: PACIFIC POWER & LIGHT

☐ - Diefenbach Properties



T15R24S34

T15R24S35

T15R24S36

24 RD SW

24 RD SW

24 RD SW

24 RD SW

M RD SW

T14R24S03

T14R24S02

T14R24S01

25 RD SW

25 RD SW

25 RD SW

O RD SW

T14R24S10

T14R24S11

T14R24S12

O RD SW

26 RD SW

M RD SW



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From: **Scott Gearheart** <[scottg@pinpointconsulting.com](mailto:scottg@pinpointconsulting.com)>  
Date: Wed, Feb 20, 2013 at 8:32 PM  
Subject: Vantage to Pomona Heights Transmission Line Project  
To: [blm\\_or\\_wn\\_mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)

BLM Manager: This email is to voice my opinion regarding the placement of the Vantage to Pomona Heights power line at the current proposed location.

<sup>A</sup> The proposed line cuts through prime farmland (My family owns land in the area.)  
which will negatively impact the productivity of the land. It would disrupt irrigation  
systems, decrease actual productive ground (due to tower placements and rights of  
<sup>B</sup> way) and create logistical issues with ground transportation and aerial application of  
chemicals needed for nearby crops.

With productive farm ground being more and more scarce, it seems very short-sighted to pursue this particular path.

I strongly encourage that another path be taken to avoid areas of valuable productive ground.

Thank you for your consideration.

Scott Gearheart

(509) 396-2048 (office)

(704) 281-7312 (mobile)

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**WASHINGTON**  
FRUIT & PRODUCE CO.

RECEIVED

FEB 20 2013

Bureau of Land Management  
WFO, Wenatchee, WA

P.O. BOX 1588 - YAKIMA, WA 98907, USA - PHONE 509-457-6177 - FAX 509-457-3675

February 13, 2013

Bureau of Land Management  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521

To Whom it May Concern,

Subject: Vantage to Pomona Heights EIS

Washington Fruit and Produce Company operates farms located in the area of the proposed Vantage to Pomona Heights Project. The route as suggested is not compatible with the current land usage and should not be constructed.

- A The power lines present a hazard to operators of farm equipment engaged in normal activities. Center pivot irrigation systems in the area require periodic maintenance that would put repair crews at risk should the line be built.
- B The route that crosses the Yakima Training Center is a more logical alternative and should be used.

Sincerely,

Cliff Plath

Washington Fruit and Produce Co.

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From: **Robert Christensen** <[bojnjo@smwireless.net](mailto:bojnjo@smwireless.net)>

Date: Thu, Feb 21, 2013 at 8:59 AM

Subject: Vantage To Pomona Heights EIS

To: [blm\\_or\\_wn\\_mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)

Your message is ready to be sent with the following file or link attachments:

Letter-PowerLineReasoning-RRC-BLM-19Feb2013

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

February 21, 2013

U.S. Department of the Interior  
Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington

Re: Proposed Vantage-Pomona Heights 230kV Transmission Line Project  
Notice of Availability, Draft Environmental Impact Statement  
78 Fed. Reg. 756, Jan. 4, 2013

Dear Sir/Madam:

We wish to comment regarding our opposition to the preferred route, "Alternative D," identified in the Bureau of Land Management (BLM) draft environmental impact statement (DEIS) published in the Federal Register on January 4, 2013. The BLM has solicited written comments on the DEIS during a public comment period that will close March 8, 2013.

As residents, landowners, farmers, and agribusiness owners and operators near Mattawa, Washington, we object to Alternative Route D. Route Segment 3c, included in Alternative D, would transverse privately-held farmland on the Wahluke Slope east of Mattawa. Our objections regarding the preferred route are based on public safety and health concerns, land use issues, and economic and social effects.

A The preferred route will place our lives and those of our friends, neighbors and employees at risk. The transmission line poles would pose a clear danger to the operators of private and commercial agricultural equipment on adjacent properties, adding to the existing danger posed by the numerous existing electric lines in the area. Visually calculating clearance distances of fertilizer and spray application equipment—such as the 80-ft. wide machinery operated by our family-owned agribusiness, Windflow Fertilizer—is a difficult task prone to error with potentially disastrous results. The poles and lines also would present a severe safety hazard to operators of planting, cultivating and harvesting equipment on properties along the BLM-preferred route. These hazards place our families' and our employees' lives in danger.

B The poles and lines would further place workers in severe danger during regular maintenance and unscheduled repairs of farm irrigation systems, such as center pivot sprinkler systems. Such operations often entail lifting segments of metal irrigation pipe into place. Crane or boom truck operators performing maintenance or repairs near the end of center pivot irrigation systems—especially those with an extending/retracting end-segment "swing-span" or an "end gun" sprinkler (having an exit orifice diameter on the order of one inch)—frequently would be placed in extreme danger along the BLM-preferred route.

C In addition, herbicide and insecticide aerial spray application airplane operation would be obstructed along the preferred route, just as pilot safety would be endangered near the preferred route. In this vein, the Yakima Herald has reported that “[a]ll of the proposed routes avoid the training center and the Desert Aire area, south of Mattawa, primarily because of concerns over aircraft safety,” because the “U.S. Army expressed concern that an above-ground crossing of the training center would pose a safety risk for military helicopters involved in training exercises.”<sup>1</sup> Frankly, we are more concerned about the threat to human life than to helicopters or other aircraft, per se.

D Nevertheless, in total disregard for the safety of civilians, the proposed transmission line would cross perpendicular to the approach path less than a half mile east of the Christensen private airport, established in 1975. The airport has been used nearly on a daily basis since its inception by private pilots as well as periodically by aerial spray application airplanes. A proposal to extend the runway toward the east (even closer to the BLM-preferred route, since the runway is bordered on the west by Grant County Road ‘O’ SW) recently has been under consideration in order to accommodate a family member’s twin-engine Piper Cheyenne, which requires greater runway length for landing.

E Furthermore, the preferred route would place families at risk as it passes nearby long-established residences and farmyards. Research has linked long-term exposure to power-frequency electromagnetic fields (EMF) to chronic health issues from stress and fatigue to cancer. Many scientists agree that EMF exposure from electrical transmission lines have carcinogenic effects, although as with historic public health threats—including toxic waste leakage from the nearby Hanford nuclear reservation—years may pass before action replaces words. In the meantime, people are already getting sick.

Becky Christensen, age 54—whose childhood home was within a quarter of a mile of the transmission lines passing over the Royal Slope to the north of Mattawa—has suffered thyroid cancer and a cancerous brain tumor. Becky’s son, Justin, age 26—whose current home nearly lies on the proposed preferred route right of way, recently has battled Hodgkin’s lymphoma. As a result of inaccuracies in historical Hanford environmental impact predictions and reports, there are others who own and cultivate local farmland but refuse to live nearby. The last thing our community needs is an additional health threat.

F We further oppose the preferred route on grounds that installation, access, operation and maintenance of the transmission line would be more costly and wasteful than other alternative routes. An alternative route across the U.S. Army Yakima Training Center (YTC) or along the west bank of the Columbia River would be more reasonable from both a land use perspective and an economic perspective.

An alternative route across the YTC not only would be shorter but also could take advantage of resources common to existing parallel existing transmission lines, such as access roads, gates and culverts, in order to minimize the required amount of new construction. These

---

<sup>1</sup> David Lester, *BLM identifies preference for Selah-to-Vantage power line*, YAKIMA HERALD-REPUBLIC, Jan. 13, 2013, available at <http://www.yakimaherald.com/news/latestpoliticsnews/694930-8/blm-identifies-preference-for-selah-to-vantage-power-line> (emphasis added).

F synergies would also result in a reduction in the required total area of newly acquired right of way and associated costs of the installation, operation and maintenance of the transmission line that would be significantly greater than the reduction in mere linear distance covered.

With over 3,000 hours of airplane flight time and 500 hours of helicopter flight time, Robert Christensen is very familiar with the safety hazards posed by power lines. We already are required to constantly deal with these dangers in our community. We know that experience helps. Nonetheless, multiple parallel sets of poles or towers and lines are much easier to see than a single set. Thus, parallel transmission lines across the YTC would effectively increase the safety of military pilots in training, while simultaneously providing them with critical experience for what lies in their future.

G It also is not clear that sufficient consideration was given in the Pacific Power and BLM transmission line routing studies and cultural studies to the possible location of the transmission line along the west bank of the Columbia River. Concerns regarding the possible disturbance of native-American artifacts would be greatly diminished by the former railroad construction and operation. Oral comments by Rex Buck of the Wanapum tribe during the February 6, 2013 open house meeting held in Desert Aire, Washington indicated the Wanapum tribe would be willing to cooperate with such a venture.

According to their website, “Pacific Power understands how important it is to develop this project in cooperation with area communities and residents, and [are] committed to working to minimize impacts to the community and the environment from project development, construction and maintenance.” However, Pacific Power and BLM appear to have entirely overlooked the reduced impact on the community and benefits that could be derived by locating the transmission line along the path of the former Milwaukee Railroad track west of the river.

The land along the BLM-preferred route includes some of the most productive in the nation—as well as some of the most pristine and scenic. Agriculture along the BLM-preferred route has contributed greatly to the Washington state economy. Agribusinesses near the preferred route have constructed fruit and produce packing facilities that employ hundreds of local workers. These activities will continue to contribute to the economy as long as they are allowed to maintain a reasonable environment in which to produce. The agricultural community along and nearby the BLM-preferred route do not deserve to be overlooked and ignored.

Despite these objections, we feel compelled to express our appreciation of the myriad benefits of modern electricity and for those who dedicate themselves to this industry. We are proud of the hydroelectric dams that harness the power of the mighty Columbia, and we would like to work in cooperation with the agency and industry representatives as they continue to develop this project. As was recently pointed out by a retired college football coach, relationships are more important than winning. We value our relationships with the BLM, PPL and BPA, representatives.

Nevertheless, we refuse to give in. Our community should not be scarred with additional power lines. The proposed transmission line should be located west of the Columbia River. We prefer instead to rise to Winston Churchill's challenge: "Never give in--never, never, never, never, in nothing great or small, large or petty, never give in except to convictions of honor and *good sense*."<sup>2</sup>

Sincerely,

Robert (Bob) and Joanne Christensen

Neil and Becky Christensen

Justin and Misty Christensen

Del and Daneen Christensen

Dean and Sarah Christensen

Alex and Kristin Christensen

Damon and Jessica Christensen

Dallon and Morgan Christensen

Kevin Christensen

Dana Christensen

CC.

Senator Maria Cantwell

Senator Patty Murray

Representative Richard "Doc" Hastings

Rep. Judy Warnick

Rep. Matt Manweller

Rep. Norm Johnson

Rep. Charles Ross

---

<sup>2</sup> *Winston Churchill quotes*, goodreads, available at [http://www.goodreads.com/author/quotes/2834066.Winston\\_Churchill](http://www.goodreads.com/author/quotes/2834066.Winston_Churchill) (emphasis added).

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# HAYNES AND SYLVIA GEARHEART

Phone: 801 363 7373  
241 N Vine St #1005E  
Salt Lake City, Utah 84103

2/15/2013

Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, WA 98801-1521

RECEIVED  
FEB 22 2013  
Bureau of Land Management  
WFO, Wenatchee, WA

Attn: Mr. William Schurger, Proj Mgr.  
Vantage to Pomona Heights EIS  
2850 ORW 020  
WAOR 65753

Dear Sir:

After our telephone conversation on Wednesday, Feb 13 2013, I went back over the information in our files regarding the Pacific Corp power line request. This project has been ongoing for several years covering the many problems that appear to be the making of BLM attempts to avoid the only logical and "common sense" routing for the power line route on the west side of the Columbia River. Obviously an early route choice met with such opposition as to bring the project to a dead end. Not one of the letters we have received has made any statement as to why the route choice was made despite the opposition. It seems that the folks at the BLM have an unreasonable desire to protect someone or something.

Reading again the comparison of alternative Routes, as found in the document now committed to a CD in Chapter 2, pgs. 71 through 86 (as prepared by the BLM staff we understand), we are very concerned about the whole EIS statement, its veracity, and its accuracy. There is virtually no mention of the massive effect the "preferred Route D" on the agricultural culture in the farm areas of blocks 251 and 253 in the South Columbia Basin Irrigation District. The chart of many pages (#2-20), is filled with affects the power line would have, or not have on the native sage grouse, native habitats, and a great deal about the Indian culture and artifacts from many centuries long gone. In addition, the projected costs of line construction, as per your projections, becomes suspect as a result of your outright favoritism.

Reading Paragraph 2.8, starting on p. 2-85 concerning the BLM Staff invitations sent to all organizations listed (they call it the private meeting) was the notable absence of any invitations to any Agricultural organizations to speak for the landowners and famers to whom this geographical area is of greatest concern. Not even WA State Dept of Ag representatives were invited to the "private" meeting. The way this whole project has been organized seems to us, the landowners and agriculturalists, is to make sure there would be no opposing statements made or considered. Only the pronounced "D" route selected by the BLM staff members was to be considered. It seems as though the farmers, and /or land owners were not worthy of being heard at this "private" meeting. The denial of an opportunity to land owners/farmers to express opposing statements at this "private" meeting, organized by the BLM verges on, if not becomes, an

C actual denial of our civil rights under the Constitution of the United States. If this already selected "D" Route were submitted to a vote of the people being impacted, it would most likely be rejected outright. The Staff of the BLM seem to be bent on ignoring the best for the people who actually own and make the land productive. The BLM Staff appear to be determined to shaft the farmers and land owners for the exclusive benefit of the favored and special interest groups that have submitted EI statements. Not one of the invited guests has or will have any investment of time and money in this area as compared to that of land owners and farmers in their operations. Neither could they care less where the power line is placed. The only real winner is Pacific Corp, who will be able to sell additional power for a handsome profit.

We have and are contacting our elected government representatives to enlist their aid in protecting our property rights and our civil rights under the laws governing these matters. The power line project has the smell of collusion and corruption. We will seek to stop this project from going forward until we, the landowners and famers, are given the opportunity to be heard in an open, well pre-publicized meeting of the public residing or having agricultural interests in that area of Washington State. Your meeting, such as the one held in Mattawa in January or early February, is no substitute for a formal hearing.

D For many reasons there is only one route on which to place the intended power line, and that is to use the old Milwaukee Railroad right-of-way on the west side of the Columbia River for its construction.

We want to emphasize that we are not opposed to the power line being constructed, only to the proposed route across the valuable farm lands of the Columbia River project.

Thank you.

Sincerely,

Haynes Dearheart Sylvia Gearheart

Haynes and Sylvia Gearheart



**Zirkle**  
RECEIVED  
FRUIT COMPANY

MAR 1 2013

Bureau of Land Management  
WFO, Wenatchee, WA

February 19, 2013

BLM Wenatchee Field Office  
Attn: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521

Re: Comments regarding the proposed Vantage - Pomona Heights 230 kV Transmission Project

To whom it may concern:

Zirkle Vineyards operates a wine grape vineyard along the route of the proposed transmission line. Alternative route 3c near Beverly would cross over the vineyard. The portion of the vineyard impacted by the proposed transmission line is in Grant County Parcel Number 150269002, which is located in the SE 1/4 of the SE 1/4 of Section 27, Township 16N, Range 23E. On the map in the EIS ("Agriculture & Irrigation, page 5 of 5") the wine grape vineyard is incorrectly labeled as a blueberry field.

Any transmission line spanning the vineyard would need to accommodate the operation of our harvesting machinery, which is 14 feet tall. Also, the transmission line would need to span the width of the vineyard so that the placement of a new tower would not require the removal of grape plants. Our vineyard is approximately 450 feet wide at the point where alternative route 3c crosses over the vineyard. Zirkle Vineyards is opposed to any transmission line or tower that would restrict our ability to operate under the wires or necessitate the removal of vineyard. If the project requires the removal of vineyard, we estimate that our initial investment plus the cost of vineyard removal and the present value of future revenues would equal \$50,000 per acre.

In 2010, Zirkle Fruit Company granted a 60' driveway easement to a neighbor in the southeast corner of Grant County Parcel Number 150269002, which is located in the SE 1/4 of the SE 1/4 of Section 27, Township 16N, Range 23E. It appears that a proposed transmission line tower, or its right-of-way, may encroach on this easement. Zirkle Fruit Company is opposed to any transmission tower or right-of-way that would restrict the use of this easement.

A

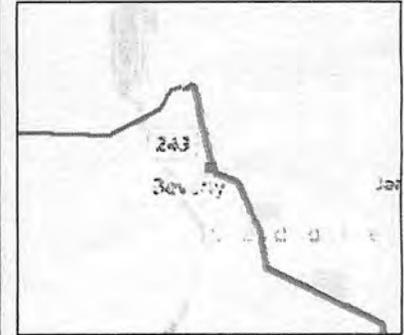
Please do not hesitate to contact me with further questions at 509-697-6101 or [philh@zirklefruit.com](mailto:philh@zirklefruit.com).

Sincerely,

Phil Hull  
Facilities Manager  
Orchard and Vineyard Operations

**ZIRKLE VINEYARDS, LLC  
150269002**

Vantage - Pomona Heights  
Transmission Line



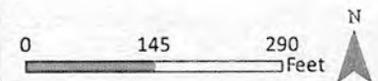
Owned Parcel

— Transmission Line

Vantage-Pomona Heights  
Transmission Line

▨ Approx. Transmission  
Line Right of Way 125ft

▭ Parcels

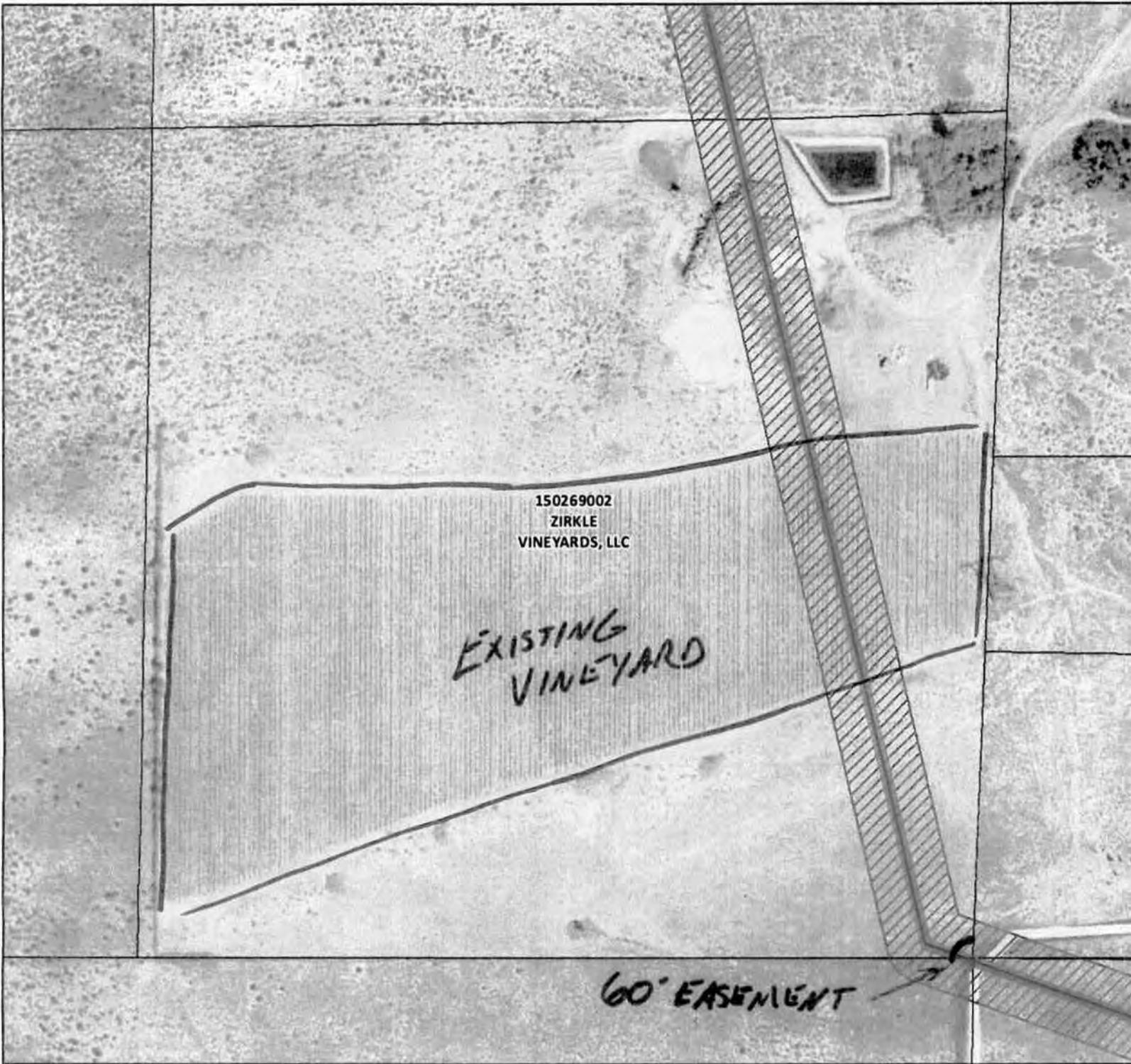


**GIS Support Services**

Data is projected in  
State Plane Washington South

**Solutions Group**  
gisdept@pacificorp.com

No Warranty. With respect to any information, including but not limited to the Confidential Information, which a Party furnishes or otherwise discloses to another Party for the purpose of evaluating Compliance, it is understood and agreed that the Disclosing Party does not make any representations or warranties as to the accuracy, completeness or fitness for a particular purpose thereof. It is further understood and agreed that no Party or its representatives shall have any liability or responsibility to another Party or to any other person or entity resulting from the use of any information so furnished or otherwise provided pursuant to this Agreement.





## Fwd: Vantage to Pomona Heights 230 kV Transmission line Project

WN\_Mail, BLM\_OR <blm\_or\_wn\_mail@blm.gov>

Mon, Mar 4, 2013 at 10:57 AM

To: William Schurger <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

----- Forwarded message -----

From: Robert Amundson <r.amundson@comcast.net>

Date: Mon, Mar 4, 2013 at 8:16 AM

Subject: Vantage to Pomona Heights 230 kV Transmission line Project

To: BLM\_OR\_WN\_Mail@blm.gov

TO:

U. S. Department of the Interior Bureau of Land Management  
915 Walla Wall Avenue  
Wenatchee, WA 98801

FROM:

Robert Amundson, rate payer Pacific Power  
1616 SW Harbor Way #403  
Portland, Oregon 97201

RE: Vantage to Pomona Heights 230 kV Transmission Line Project

I am a Pacific Power customer in Portland, Oregon. I appreciate the opportunity to comment on the Bureau of Land Management's (BLM) draft environmental impact statement (EIS) for the proposed 230 kV transmission line. The stated purpose of the new line is to mitigate the risk associated with the loss of the existing Pomona-Wanapum 230 kV transmission line. A study by Pacific Power identified the loss of this line as the single most critical outage condition on the Mid-Columbia system.

A I am disappointed that BLM's EIS presents limited alternative routes that run predominately through private property and will cross within critical distance of two known sage grouse leks. Furthermore, these routes are almost double the length of a once proposed northern route that was eliminated by the US military because of potential hazards to helicopter flights. If this line were new to the area then I would see that this could be a concern. However, a line already exists and several other lines approach the area of the firing center near Vantage. Since several lines already exist on the center and pilots need to train for action in real conditions (power lines), this seems like a very thin reason for not using this route. I object to all the proposed alternative routes in this EIS because they will not provide efficient power because of the substantial increased costs necessary to procure productive agricultural land and the added length of the power lines. Thus, I strongly urge the BLM to consider the "no action option" since all the other options presented greatly increase the listed impacts in the EIS's abstract (see below) compared to a potential but denied route parallel to an existing 230 kV line north of the Yakima Training Center (JBLM YTC).

B As a second choice from the "no action alternative", if forced to choose from the present alternatives then I would choose the following: Use routes 1a and 1b. At the point of departure for route 2a, I suggest that 1 b continue along the southern border of the Yakima Training Center (YTC). Poles can be erected next to existing roads and fire trails that are owned and maintained by YTC. I think a continuation along the YTC border would have fewer impacts on artifacts, sage grouse, vegetation, and endangered species, and would

- C minimize the risk of introduction of noxious weeds than the 2a and 2c segments proposed. This proposed route should link up with route 2b at the southern most boundary of the YTC. Moving east along route 2b that follows the YTC boundary, I propose that the line should continue along the YTC border north then east then north again until it intersects with the proposed route 3b. Finally, the
- D line should follow route 3b to the Vantage Sub-station. This is the shortest route of all alternatives and has the least impact on private land. Caution should be taken in avoiding the Wanapum Village.
- E It appears that the most cost effective route to meet the goal of producing a third 230 kV line to mitigate the risk of power failure to the Yakima area would seem to be the northern route that was eliminated. I suggest that the BLM reconsider using this route and work with JBLM YTC to minimize risks to JBLM TYC personnel by placement of the line.

Respectfully,

Robert Amundson

—

BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121



## Fwd: Vantage to amona Heights Project

WN\_Mail, BLM\_OR <blm\_or\_wn\_mail@blm.gov>

Mon, Mar 4, 2013 at 10:56 AM

To: William Schurger <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

—— Forwarded message ——

From: **martina charvet** <[martinakcc@embarqmail.com](mailto:martinakcc@embarqmail.com)>

Date: Sun, Mar 3, 2013 at 5:32 PM

Subject: Vantage to amona Heights Project

To: [OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

Dear Linda Coates-Markle

I am a resident outside the area that you are proposing for a high density power line. However I travel this area quite frequently and It upsets me that BLM / Pacific Power is thinking of adding a huge line in this area.

A We already have lines running East and West from the Columbia River and seems as thou this project could be hooked on to one of these lines.

The area that you are proposing has been pristine for all of my lifetime and I would think that there is a better way than down Hwy 24!

Why can't this project go along the existing project across the Yakima Training center where very few people would ever see these lines.

It seems like you are taking the **longest** and the most **expensive** way to move power when it could piggy back on lines already existing.

Please take this under consideration before more of our pres tine land is filled with ugly power lines at an expense to the public.

This is one of those things that I am sure that not enough people really realize what you are proposing and it will be done anyway with everyone waking up later.

Please Please find a different way!

Sincerely

Mrs. Henry Charvet

4060 Hornby Road

Grsandview, WA. 98930

—

BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121

RECEIVED

MAR 4 2008

Bureau of Land Management  
WFO, Wenatchee, WA

BLM  
Wenatchee Field Office  
Attn: Vantage to Pomona Heights EIS  
925 Walla Walla Ave.  
Wenatchee, WA 98802-1521

Hello!

Enclosed with this letter is another letter written by a Mr. Mike Martinez to the editors of the Yakima Herald-Republic. It appeared in the Feb. 24 issue.

This letter expresses several issues of concern regarding the proposed new 230 kV power line route.

A Let me say that I agree with Mr. Martinez totally. Why should we – the ratepayers- fund another line when we are at the same time being told by Pacific Power that due to lower sales of power (from conservation efforts) the rates need to be increased? If we are using less power then we don't need new power lines.

B Another issue is the routing of the proposed lines. If there are already existing lines going across the Yakima Firing Range and the new ones could simply run parallel to those lines (as Mr. Martinez states in his letter) why not use that route which is much shorter and hopefully less expensive?

I'm with Mr. Martinez—the necessity of new power lines from Vantage to Pomona Heights needs to be revisited.

Sincerely,



Thomas J. Gilfoil

[captaink009@gmail.com](mailto:captaink009@gmail.com)

2701 Wilson Hwy  
Grandview, WA 98930

# Do we need power line?

POSTED ON FEBRUARY 24, 2013

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*Moxee*

extended the comment period to March 8 on its

Environmental Impact Study of potential alignments for a new 230 kV line from the Vantage substation into Yakima (Yakima Herald-Republic, Feb. 11). The line will be built by Pacific Power and paid for by its ratepayers. A Feb. 16 article noted that Pacific Power is asking to increase rates because revenues are down because of lower electrical use.

I question whether this line is necessary and encourage readers to ask BLM to reject all proposed routes. Ask that Pacific Power work with elected officials to determine if the extra power line is necessary. If it isn't, don't build it; if it is, select the most cost-effective route.

Ratepayers should care because they will pay more than necessary for any of these longer routes proposed in the BLM EIS, which also will impact productive agricultural land. The Yakima Firing Center stopped consideration of an alternate route that would be cheaper to build and wouldn't impinge on productive agricultural land and runs parallel to an existing 230 kV line.

Email comments to: [BLM-OR-WN-MAIL@blm.gov](mailto:BLM-OR-WN-MAIL@blm.gov), or mail to BLM Wenatchee Field Office; Attn: Vantage to Pomona Heights EIS; 925 Walla Walla Ave., Wenatchee, WA 988902-1521



Schurgen, William (wschurge@blm.gov)

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## Fwd: VANTAGE TO POMONA HEIGHTS 230 KV TRANSMISSION LINE PROJECT

1 message

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**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Mon, Mar 4, 2013 at 3:09 PM

To: Sandra Gourdin <sgourdin@blm.gov>, William Schurgen <wschurge@blm.gov>

—— Forwarded message ——

From: **Daniel Martinez** <martinezlivestock@wildblue.net>

Date: Mon, Mar 4, 2013 at 2:35 PM

Subject: VANTAGE TO POMONA HEIGHTS 230 KV TRANSMISSION LINE PROJECT

To: [BLM\\_OR\\_WN\\_MAIL@blm.gov](mailto:BLM_OR_WN_MAIL@blm.gov)

Sincerely,

Mike Martinez

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121

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 **van.pdf**  
167K

To:  
U. S. Department of the Interior Bureau of Land Management  
915 Walla Wall Avenue  
Wenatchee, WA 98801

From:  
S MARTINEZ LIVESTOCK INC  
13395 HIGHWAY 24  
MOXEE WA 98936

RE: Vantage to Pomona Heights 230 kV Transmission Line Project

We appreciate the opportunity to comment on the Bureau of Land Management's (BLM) draft environmental impact statement (EIS) for the proposed 230 kV transmission line. The stated purpose of the new line is to mitigate the risk associated with the loss of the existing Pomona-Wanapum 230 kV transmission line.

- Overall, we are disappointed that BLM's EIS presents limited alternative routes that run predominately through private property when public lands with existing access roads could be used as a corridor for the power line. Furthermore, these routes are almost double the length of a once proposed northern route that was eliminated by the US military because of potential hazards to helicopter flights. We object to all the proposed alternative routes in this EIS because they will not provide efficient power because of the substantial increased costs necessary to procure productive agricultural land and the added length of the power lines. Thus, we strongly urge the BLM to consider the "no action option" since all the other options presented greatly increase the listed impacts in the EIS's abstract (\*see below) compared to a potential but denied route parallel to an existing 230 kV line north of the Yakima Training Center (JBLM YTC).
- A
- B If forced to choose from the present alternatives then we choose the following: Use routes 1a and 1b. By using route 1b rather than 1c an existing road can be used. At the point of departure for route 2a, we suggest that 1b continue along the southern border of the Yakima Training Center (YTC). Poles can be erected next to existing roads and fire trails that are owned and maintained by YTC. We think a continuation along the YTC border would have fewer impacts on artifacts, sage grouse, vegetation, and endangered species and would reduce the potential introduction of noxious weeds from the activities around building the line along the existing perimeter road than building the line along the 2a and 2c segments proposed.. We think this because the perimeter road along the fence could be used for moving construction equipment. This proposed route would link up with route 2b at the southernmost boundary of the YTC. Moving east along route 2b, we propose that the line should continue along the YTC border north then east then north again until it intersects with the proposed route 3b. By following the YTC fence north to a point that would intersect with route 3b it would eliminate the proposed route section 2d. We suggest this because the proposed route 2d would come close to a BLM area of critical environmental concern (ACEC) near the Columbia River. In addition, there is a
- C

proposal for that portion of the Columbia River to be designated a wild and scenic river.  
D By building along route 2 d to the route 3 segment instead of along the YTC fence the line would intercept the Columbia River at a point that would visibly degrade the nature of a wild and scenic river.

Finally, we prefer route 3b to the Vantage Sub-station over route 3 c for several reasons.  
E Route 3 b is shorter than route 3 c and would thus cost less to build. Route 3 b will minimally impact private lands and agricultural lands; whereas, route 3 c will run for miles through agricultural land. None of route 3 b, as we suggest, would run along a part of the Columbia River that may be designated wild and scenic. Several miles of route 3 c would visually degrade the wild and scenic status of that part of the river since it runs close to this section of the river for several miles. Additionally, the point at which route 3c crosses the river is a section of the river with a high density of potential spawning areas.  
F Has the BLM taken into consideration any potential impact of the lines' effect from predators perching on the lines. Furthermore, have any studies been done on the potential for the increased electromotive energy affecting spawning activity?

We strongly urge the BLM to minimize the impacts of this proposed line by following the southern and eastern boundary of the YFC so that the existing boundary roads can be used for moving construction equipment. Furthermore, as a general rule we strongly suggest that the BLM selects a route that minimizes the impacts on private and agricultural lands.

It appears that the most cost effective route to meet the goal of producing a third 230 kV line to mitigate the risk of power failure to the Yakima area would seem to be the northern route that was eliminated. We suggest that the BLM reconsider using this route and work with JBLMYTC to minimize risks to JBLMTYC personnel by placement of the line.

From the EIS abstract:

\*The following issues were identified for analysis in the Draft EIS based on public scoping: potential impacts on sage-grouse populations and habitat, and special status wildlife species and protected birds; avian collision potential; effects on vegetation; sagebrush and native grassland communities disturbance types and levels; endangered and threatened plant species effects; introduction, spread and control of noxious weeds; impacts on cultural resources, prehistoric and historic sites; impact to aerial spraying and the use of helicopters to dry cherry orchards; safety hazard on farm workers and equipment from inducted current; impact on GPS, cell phones, and other equipment; electric and magnetic field health effects; effects on agricultural systems, center-pivot irrigation and electronics used in farm equipment; impacts on residential areas and planned development; effects on productive or revenue generating state lands; amount and types of impact on agricultural land, production, equipment and aerial spraying; affect on recreational areas and opportunities; impact on Native American Tribal cultural properties; financial impacts to farming and agricultural operations; effect on property values; effects on low-income and minority populations or communities; potential for increased public access on access roads; private property aesthetic impacts; effects on BLM Visual Resource Management objectives; effects on fire management/suppression activities and risk of wild fire; and impacts on JBLM YTC training operations.

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Schurger, William <wschurge@blm.gov>

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## Fwd: Vantage to Pomona Heights project

message

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**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Mon, Mar 4, 2013 at 10:57 AM

To: William Schurger <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

----- Forwarded message -----

From: **John Klingele** <jeklingele@clearwire.net>

Date: Mon, Mar 4, 2013 at 10:21 AM

Subject: Vantage to Pomona Heights project

To: **OR\_Wenatchee\_Mail@blm.gov**

Attached are my comments regarding the Vantage – Pomona Heights 230kV transmission project in Word format.

Be not afraid to contact me if you need to know the words that were redacted for security reasons.

Sincerely,

*John Klingele*

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121

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 **Vantage-PomonaComments.docx**  
118K

United States Department of Interior  
Bureau of Land Management  
Spokane District, Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521

1312 West Walnut Street  
Yakima, WA 98902-3124  
March 3, 2013  
(509)457-6085

RE: Vantage to Pomona Heights 230 kV Transmission Line Project

Dear Decision Committee,

Having reviewed the hundreds of pages of the Draft Environmental Impact Statement, I have some comments.

First, to review the reasons for this new line. The present 230 kV line from Midway to Union Gap has a summer load rating of 340MVA. The present Wanapum to Pomona Heights 230kV line has a summer rating on 400MVA. The 115kV line from BPA's Moxee Substation into the Yakima area load has a summer load limit of 115MVA. This totals 855MVA, more than enough to serve the nearly 550MVA ratings of the neighborhood substations IF nothing goes wrong or needs servicing. Those substations are very well loaded when temperatures exceed 100°F (some are so loaded that the cooling fans must be locked on all summer long to reduce over heating episodes). Taking either 230kV line out of service on a hot summer's day when air conditioning loads are greatest may require that some customers be without electricity when they are hottest under the collar. Clearly the North American Electric Reliability Corporation standards are backed up by local needs.

Second, some basic electricity. Two lines operating in parallel of the same material and size are most efficient when the load is evenly split between the two, which is accomplished by being the same length (as can be demonstrated by the requirements of the National Electrical Code section 310-4). These two lines between Pomona Heights and Vantage operating in parallel will not be of the same length, but will be of the same material and conductor size. The longer one will carry less power -- the imbalance being in direct relationship to the differences in length -- the less difference in length, the less the imbalance. All eight of options are of greater line miles than the present Wanapum to Pomona Heights 230kV line. Minimizing the length of the new line will help keep operational problems to a mild roar. [Two lines operating in parallel, one twice the length of the other -- the shorter will carry twice the power of the longer.]

Third, geographic diversity. One of the standards that the North American Electric Reliability Corporation incorporates into its regulations is distance between lines that are to provide reliability of service if one is taken out of service because of a natural or man-generated incident. By having transmission lines in separate corridors, an adverse incident on one line is less likely to spread to a line in a separate corridor. For example: a crop dusting airplane hitting a line in a corridor may also hit another line in the same corridor but will not hit a line in a corridor a mile away. The Agency Preferred Route includes segment 2C which has the new Vantage to Pomona Heights cross over (twice) and use the same corridor as the Midway – Moxee and Union Gap – Midway lines. This 9 miles of common corridor defeats the basic purpose of constructing the new line. If an incident were to occur in this 9 mile section of corridor, all three lines could be affected resulting in the Yakima area system having to have a forced outage (people without power) so that the Wanapum – Pomona Heights line not be overloaded. Alternative 2B provides for corridor separation of at least one mile throughout its length, thus meets NERC's standards.

The Agency Preferred Route also includes segment 3C, which has 7 miles of corridor in common with the Hanford – Vantage line. It crosses high voltage transmission lines 8 times as well as several near the Vantage substation. Alternative 3B corridor is separate from all other transmission corridors throughout most of its length, the exception is at its Columbia River crossing to the Vantage substation segment. It crosses no other transmission lines except at the Vantage substation.

Fourth, Security. The Agency Preferred Route segment 3C is located in an area with considerable public access, opportunities for [REDACTED] or [REDACTED] [REDACTED] abound; entailing Pacific Power to report more incidents under NERC's standard CIP-001-2a. By having 8 remote locations where transmission lines cross, opportunities for [REDACTED] or [REDACTED] [REDACTED] are built into the routing. With the transmission line being located adjacent to high speed through roadways there is much more opportunity for traffic accidents to take the line out of service and generating considerable public endangerment. Alternative 3B has very limited access to the general public and close proximity to military operations greatly reducing the exposure to [REDACTED] and [REDACTED] [REDACTED]. The roadway near the northern section of Alternative 3B is a dead end road with very limited traffic.

In reading the Environmental Impact Statement, I found some errors in the data presented in the route impact summaries and the above considerations absent. I hope that this will provide you more to consider in selecting the final transmission route.

Sincerely,

*John Klingele*

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Schurger, William <wschurge@blm.gov>

## Fwd: Vantage to Pomona Heights EIS

WN\_Mail, BLM\_OR <blm\_or\_wn\_mail@blm.gov>

Tue, Mar 5, 2013 at 9:05 AM

To: William Schurger <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

----- Forwarded message -----

From: **christy malone** <maloneconsultation@gmail.com>

Date: Mon, Mar 4, 2013 at 11:15 PM

Subject: Vantage to Pomona Heights EIS

To: [OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

Christy Malone  
491 Sage Trail Rd  
Yakima, WA 98901

Linda Coates-Markle  
Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Ave  
Wenatchee, WA 98801

March 4, 2013

Dear Madam,

I have just recently been informed of the intent of Pacific Power to run a high voltage electric line known as the Vantage to Pomona Heights line, adjacent to my property. I never received any prior notice of public hearings or the packet that was mailed to other homeowners in the past few months. I can thank a vigilant neighbor for supplying me with copies of her packet. That said, I hope that you will accept my comments now on this matter. Please note that Sage Trail Road is a private road, not a county maintained road. We have a single lane wooden bridge, also privately maintained, that must be crossed to access our road. From what I have read, there is no mention of any mitigation for the impact of heavy machinery and equipment traversing our bridge (which has holes in it now) and degrading our gravel road to put up a power line that in no way benefits our neighborhood. We as the owners of that private road are supposed to absorb these impacts along with the reduction in our property values so Pacific Power can provide power for future growth to a community 20 miles away at our expense?

- A
  - B
  - C
  - D
- I am opposed to the proposed location of an above ground transmission line along Sage Trail Road. That location places the highest impact on our view corridor and on our daily exposure to emissions from those lines as we drive under them. We will not be able to sit outdoors and listen to the birds, we will be bombarded with the white noise of transmission lines instead. Would you find that appealing? I walk up in the hills near the existing lines which do not carry the voltage

this new set will, and that noise is irritating. I cannot image having that in my front yard 24/7, nor do I want to. The Sage Trail location should only be approved if those lines are run underground through our community. I moved here from Reno and my community there faced a similar situation, it now has underground lines instead of the 100' towers that were originally proposed.

It is my belief that any above ground transmission line should run parallel to, or in the same corridor as, the existing power lines BEHIND all of our homes further up the hill. That location places the least impact on our small community. Nobody drives under those lines, nobody lives near those lines. The existing power line corridor is just under the ridge line, and there is ample room between the ridge line and the access road below for another set of lines. I would ask that you place as high a priority on the humans within the area of your EIS as that of the other animals who will be impacted by this project, because our quality of life would surely suffer if you allow Pacific Power to destroy Sage Trail Road with an above ground line..

Sincerely,

Christy Malone  
Horticultural Consultant

This letter has also been sent as an attachment for your records.

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121

---

 **blmEis.doc**  
22K

Christy Malone  
491 Sage Trail Rd  
Yakima, WA 98901

Linda Coates-Markle  
Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Ave  
Wenatchee, WA 98801

March 4, 2013

Dear Madam,

I have just recently been informed of the intent of Pacific Power to run a high voltage electric line known as the *Vantage to Pomona Heights* line, adjacent to my property. I never received any prior notice of public hearings or the packet that was mailed to other homeowners in the past few months. I can thank a vigilant neighbor for supplying me with copies of her packet. That said, I hope that you will accept my comments now on this matter. Please note that Sage Trail Road is a private road, not a county maintained road. We have a single lane wooden bridge, also privately maintained, that must be crossed to access our road. From what I have read, there is no mention of any mitigation for the impact of heavy machinery and equipment traversing our bridge (which has holes in it now) and degrading our gravel road to put up a power line that in no way benefits our neighborhood. We as the owners of that private road are supposed to absorb these impacts along with the reduction in our property values so Pacific Power can provide power for future growth to a community 20 miles away at our expense?

I am opposed to the proposed location of an above ground transmission line along Sage Trail Road. That location places the highest impact on our view corridor and on our daily exposure to emissions from those lines as we drive under them. We will not be able to sit outdoors and listen to the birds, we will be bombarded with the white noise of transmission lines instead. Would you find that appealing? I walk up in the hills near the existing lines which do not carry the voltage this new set will, and that noise is irritating. I cannot image having that in my front yard 24/7, nor do I want to. The Sage Trail location should only be approved if those lines are run underground through our community. I moved here from Reno and my community there faced a similar situation, it now has underground lines instead of the 100' towers that were originally proposed.

It is my belief that any above ground transmission line should run parallel to, or in the same corridor as, the existing power lines BEHIND all of our homes further up the hill. That location places the least impact on our small community. Nobody drives under those lines, nobody lives near those lines. The existing power line corridor is just under the ridge line, and there is ample room between the ridge line and the access road below for another set of lines. I would ask that you place as high a priority on the humans within the area of your EIS as that of the other animals who will be impacted by this project, because our quality of life would surely suffer if you allow Pacific Power to follow Sage Trail Road.

Sincerely,

Christy Malone  
Horticultural Consultant

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RECEIVED

MAR 6 2013

Bureau of Land Management  
WFO, Wenatchee, WA

SADDLE MOUNTAIN VINEYARDS, LLC  
STONE TREE VINEYARD  
11702 South Griffin Road  
Prosser, WA 99350

Telephone: 509/786.4340 Fax: 509/786.1939 Email: [teddwildman@bentonrea.com](mailto:teddwildman@bentonrea.com)

5 March 2013

BLM Wenatchee Field Office  
925 Walla Walla Ave.  
Wenatchee, WA 988902-1521

To Whom It May Concern,

I am writing to register my opposition to the proposed 230 kV Vantage-Pomona power transmission line in the strongest of possible terms. The shortest distance between two points is a straight line, as most of us learned in introductory geometry. The proposed route is far from that. Questions have also been raised as to the need for the power and therefore the need for the new line.

The most recently proposed route has the line sited on the east border of the property I farm near Mattawa Washington. It is located at S28 T15N R24E, Grant County parcel #40-0877-100, WDNR lease# 12-073035, at the intersection of Roads O and 23 SW, known commercially as StoneTree Vineyard, [www.stonetreevineyard.com](http://www.stonetreevineyard.com), and is planted to ultra-premium wine grapes.

A The currently proposed route would negatively impact my ability to efficiently farm a significant portion of this parcel. Mandatory vacation of the entire right of way would take approximately ten acres of production, representing an annual opportunity cost of approximately \$12,000 per year, 0.825% of which goes to DNR as cash rent. Furthermore, any conceivable configuration of tower footprint would result in disruption of farming practices, loss of property value, loss of crop production value, and place an unacceptable burden on my operation.

B According to the low resolution map provided by Pacificorp, the route crosses the Columbia River into Grant County at approximately Road N SW, and continues north until Road 24SW. There it takes a 90 degree turn west to Road O, and then north and ultimately on the east border of the above described property, and then onto BLM land. I am formally requesting an explanation of why the route makes this sudden change in direction, rather than simply continuing north on the line of Road N. The route

without the 90 degree turn west would continue north and actually enter public land sooner than the proposed route and thereby impact fewer private agricultural enterprises.

C Furthermore, the rationale and justification of the proposed transmission line is questionable. It has been reported that rate payers will be subjected to a rate increase to compensate Pacificorp for revenue shortfalls due to reduced power consumption (The Yakima Herald, Feb. 11, 2013). At the same time, the new transmission line will ultimately be paid for by rate payers. This is illogical at best and double dipping at the worst. If the line is to be built at all, the most logical route and the shortest distance is a more direct line between the two points, and would run parallel to an existing 230 kV line on the Yakima Firing Center. There, to my knowledge, are no farming operations to be adversely affected, and the long term impacts would be no greater than in the current configuration. Let common sense prevail.

Thank you for your consideration. I invite your response. I am submitting this in writing via US Postal service, as both the online comment line and email address you provided are conveniently non-functional.



Tedd Wildman  
Operations Manager/Owner  
Saddle Mountain Vineyards



Schurger, William <wschurge@blm.gov>

---

## FW: Zine Badissy Comment

1 message

---

**Darrin Gilbert** <darrin.gilbert@powereng.com>

Fri, Mar 8, 2013 at 3:20 PM

To: Janet Hutchison <j1hutchi@blm.gov>

Cc: William Schurger <wschurge@blm.gov>, John Everingham <jevingham@powereng.com>

Janet;

We received this comment from Hannah, apparently submitted to BPA on the Midway-Moxee during scoping. I'm not sure how you would like to handle it.

### **Darrin K. Gilbert**

#### ***Environmental Planner***

2041 South Cobalt Point Way

Meridian, ID 83642

208-288-6123 - Office

208-515-1658 - Cell

#### **POWER Engineers, Inc.**

Energy ■ Facilities ■ Communications ■ Environmental

[www.powereng.com](http://www.powereng.com)

 Go Green! Please print this e-mail only when necessary. Thank you for helping POWER Engineers be environmentally responsible.

---

**From:** Dondy-Kaplan, Hannah A (BPA) - KEC-4 [mailto:[hadondy-kaplan@bpa.gov](mailto:hadondy-kaplan@bpa.gov)]

**Sent:** Thursday, March 07, 2013 3:11 PM

**To:** Darrin Gilbert 6123

**Subject:** FW: Zine Badissy Comment

Hi Darrin,

This came in on our Midway-Moxee project but it looks like they refer to the Vantage EIS.

Hannah

---

**From:** St Hilaire, Kimberly R (BPA) - KEC-4  
**Sent:** Thursday, March 07, 2013 2:08 PM  
**To:** Hamel, Chad J (BPA) - TEP-TPP-1; Olson, Lesli D (CONTR) - TERR-BELL-1; Dondy-Kaplan, Hannah A (BPA) - KEC-4  
**Cc:** Lynam, Kurt O (BPA) - DKE-7  
**Subject:** Zine Badissy Midway-Moxee Comment

Hello,

We received this comment, which is actually for the proposed Vantage – Pomona project. Hannah can forward this to the BLM.

I think Mr. Badissy also has lands along the Midway-Moxee Rebuild Project. Is there a phone number for him so Chad or Lesli can call and explain the two different projects and see if he has any specific comments on our project?

Kimberly

---

 **PI\_SCOPING\_COMMENT\_Midway-Moxee\_Zine\_Badissy\_.pdf**  
46K



# Proposed Midway-Moxee Transmission Line Rebuild Project

Benton County and Yakima County, Washington

"I'd like to tell you..."

Please have your environmental studies look at:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I need more information about:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I CANNOT ACCEPT YOUR PRESENT DESIGN BECAUSE IT IMPACT MY FARMING BUSINESS

I have these other comments:

A Regarding the transmission project (DOT- BLM- OR- 134-2013-0002-EIS)  
I cannot accept your design because it impact my farming business

I was overbooked during your last public meeting and could not attend to object to your proposed design

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Name: Zinc BARNER B7 BLACKROCK RANCH # BLACKROCK ORANGE  
Address: 4909 119 PL NE  
City: R. KIRKLAND State: WA Zip: 98033

You can fax your comments to BPA 503-230-4019, mail them to BPA Communications, DKE-7; P.O. Box 14428; RE: Midway-Moxee Rebuild Project; Portland, OR 97290-4428, or submit comments via e-mail at: [www.bpa.gov/comment](http://www.bpa.gov/comment) or return them in the enclosed postage paid envelope by March 8, 2013.

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March 4, 2013

BLM Wenatchee Field Office  
Attn: Vantage to Pomona Heights EIS Project Manager  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

RECEIVED

MAR 7 2013

Bureau of Land Management  
WFO, Wenatchee, WA

**RE: Vantage to Pomona Heights 230 kV Transmission Line Project DEIS**

This letter is in opposition to the Vantage to Pomona Heights 230 kV Transmission Project route 1a.

My Husband and I own parcels #191305-22404 and 191305-22403 under Buermann Living Trust. (See attached maps) Those parcels are in close proximity to the proposed route 1a.

A Running the 230 kV transmission line on Sage Trail Road would have a huge environmental impact in the area. The impact would be the visual of the transmission line from sensitive viewers, scenic views would change, change in natural scenery and road use impact. See table 3.8-4 in the BLM DEIS. Our property area is zoned Rural Remote.

B Chapter 2, Section 2.4.2.1 of the BLM DEIS states: "that all new equipment will be installed within the existing substation fence." This is in fact not true because there are plans to now enlarge that Pomona Heights Substation 40 feet to the South.

C Since the transmission line is proposed to run on Sage Trail Road at the base of my property line numerous trees would have to be removed to install the line. Our scenic view and those of others on Sage Trail Road including the Country Squire Mobile Park would be impacted because using H-frame or monopole transmission structures would put the transmission lines at view height. In other words, you would look out our view windows directly at the transmission wires and poles. See Chapter 3, page 254, *Immediate Foreground* in the BLM DEIS.

D In the BLM DEIS Chapter 3, item number 3.8.4.1 states:  
Other existing development along this route includes a 230 kV wood single pole and H-frame transmission line crossing Sage Trail Road and various electrical distribution lines as well as various gravel roads and driveways

The reality is that transmission line crosses Sage Trail Road over ¾ of a mile up Sage Trail Road. Some of the electrical distribution lines are to the South of Sage Trail Road behind my property.

E Sage Trail Road is a private road not maintained by Yakima County. The homeowners on Sage Trail Road pool their money to maintain the road. Access to Sage Trail Road is by a single lane bridge. Chapter 3, section 3.7.2.2. page 236 in the BLM DEIS-County Roads, states: "The road is primarily chip sealed but becomes gravel layered further west as it turns into John Street." Sage Trail Road is only paved as it comes off E. Selah Road for about 300 yards. Just before the single lane bridge and after, it is a gravel road only. Increased construction traffic, i.e. trucks, bull dozers, dump trucks, equipment

& material trailers, tractors, trailers, fork lifts, cranes, line trucks, bucket trucks, water trucks, (you get the picture) etc. could cause considerable harm to the bridge and roads.

When you look at the BLM DEIS Figure 2-2 (page 57) Schematic Illustration of Route Alternatives no alternative to Route 1a is even offered. I would respectfully request you consider a new alternate route. I have attached maps showing my property that I received from Pacific Power and a GIS map copied from Yakima County. On the GIS map I have marked my property (gray area) and the proposed 1a route (marked in red). Directly next to my property, parcel #11005 is owned by Pacific Power. They currently have a 230 kV transmission that travels South and South East up the hill.

On Friday March 1<sup>st</sup> John Aniello, Sr. Engineering/Ops Project Manager for Pacific Power came from Portland, Oregon to visit my property and see first hand my issues with the proposed 230 kV transmission line. After viewing my property and the proposed route 1a he stated it would make more sense to go south and south east up the hill (behind my property) close to the existing 230 kV transmission lines. Evidently there was a recent change in the Federal law that requires lines to be 500' or more apart and now they can be closer. He stated it appears there would be room to put the new line behind my property instead in front of it. This change in route would satisfy a lot of property owners on Sage Trail Road that have the same environmental & road concerns as I do.

I understand this route was considered at one time but was eliminated because they were looking at putting the new 230 kV transmission line on the existing poles and it would be in violation of the NERC and WECC standards of reliability and approved criteria for line separation. See BLM DEIS section 2.6.1.1 With my proposed route they could put in new poles with the 230 kV transmission line on them. There is room and if they need to put poles on my parcel #191305-22403 they could.

F There is also a medium sized mobile park with at least 60 mobile homes directly behind where they want to put the new 230 kV transmission line, just below my property to the North. It is my understanding they eliminated another route because of the mobile park. Why would they include it in route 1a now?

G With regards to Wildlife I know of no threatened species in the immediate area. However, there is a nesting area for owls just below parcel #191305-21421 which would be a shame to have disturbed.

Thank you for your consideration.



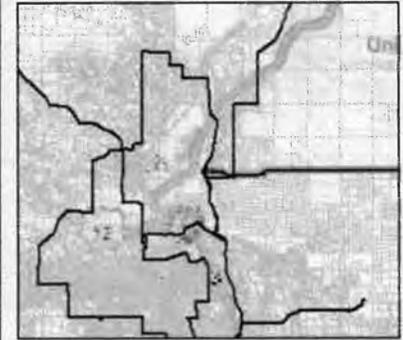
Ronald and Judith Buermann  
351 Sage Trail Road  
Yakima, WA 98901  
509-952-3591  
Email



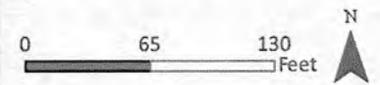
19130522404  
Buermann  
Living Trus

**Buermann Living Trus  
19130522404**

Vantage - Pomona Heights  
Transmission Line



-  Owned Parcel
-  Transmission Line
-  Vantage-Pomona Heights  
Transmission Line
-  Approx. Transmission  
Line Right of Way 125ft
-  Parcels



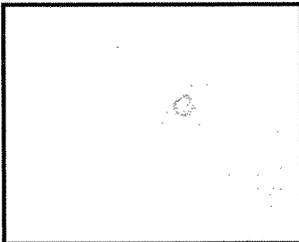
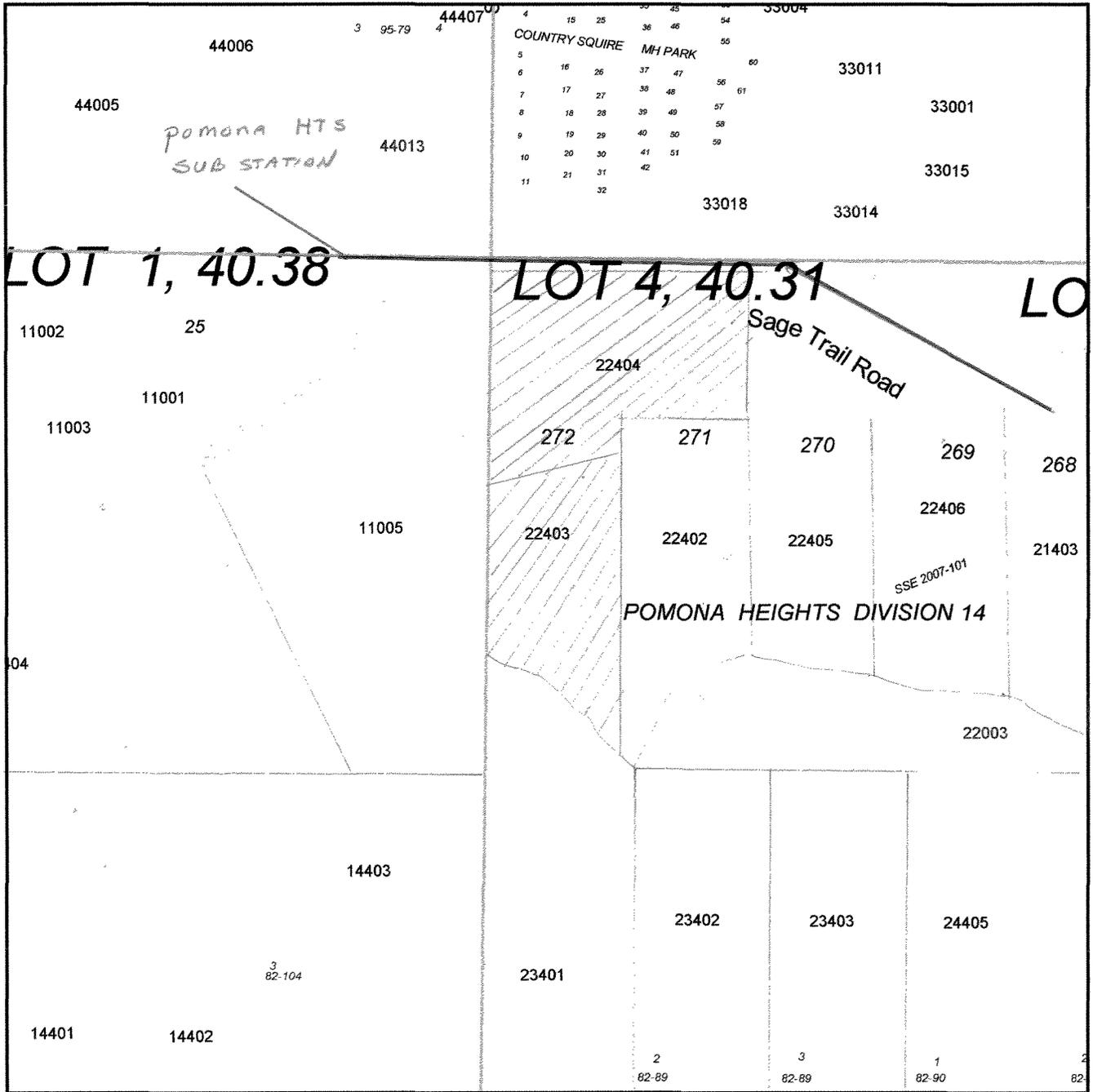
Data is projected in  
State Plane Washington South

**GIS Support Services**  
**Solutions Group**  
gisdept@pacifiCorp.com

No Warranty. With respect to any information, including but not limited to the Confidential Information, which a Party furnishes or otherwise discloses to another Party for the purpose of evaluating Compliance, it is understood and agreed that the Disclosing Party does not make any representations or warranties as to the accuracy, completeness or fitness for a particular purpose thereof. It is further understood and agreed that no Party or its representatives shall have any liability or responsibility to another Party or to any other person or entity resulting from the use of any information so furnished or otherwise provided pursuant to this Agreement.

# Yakima County GIS - Washington Land Information Portal

[Print Map]  
[Close Map]



Map Center: Range:19 Township:13 Section:5

 City Limits  
 Sections

[WWW.YAKIMAP.COM](http://WWW.YAKIMAP.COM)  
 Yakima County GIS  
 128 N 2nd Street  
 Yakima, WA 98901  
 (509)574-2992



One Inch = 400 Feet  
 Feet 200 400 600



Schurger, William <wschurge@blm.gov>

---

## Fwd: Vantage to Pomona Heights 230 kV Transmission line Projecy

1 message

---

**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Fri, Mar 8, 2013 at 10:47 AM

To: Sandra Gourdin <sgourdin@blm.gov>, William Schurger <wschurge@blm.gov>

—— Forwarded message ——

From: **Bunny** <bjmsgw@aol.com>

Date: Thu, Mar 7, 2013 at 9:28 PM

Subject: Vantage to Pomona Heights 230 kV Transmission line Projecy

To: **BLM\_OR\_WN\_Mail@blm.gov**

Attached copy for public comments.

Thank-you,

Bradley J. Martinez

[bjmsgw@aol.com](mailto:bjmsgw@aol.com)

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121

---

 **pp&L line, used copy.docx**  
12K

Bradley J. Martinez  
13393 State Route 24  
Moxee, WA 98936

March 7, 2013

U.S. Department of the Interior Bureau of Land Management  
915 Walla Walla Avenue  
Wenatchee, WA 98801

RE: Vantage to Pomona Heights 230 kV Transmission Line Project

To Whom It May Concern:

- A As a concerned land owner affected by this project, I am not in agreement with the proposed route 2c. It will have a negative impact on the farm and range land that it will run through. Also it will disrupt the native ecosystem including, nesting hawks, sage grouse, owls, jack rabbits and native grasses and shrubs.
- B native ecosystem including, nesting hawks, sage grouse, owls, jack rabbits and native grasses and shrubs.

- C I believe the 1a and 1b routes, which run along the south boundary of the Yakima Training Center, would be more advantages to land owners, BLM, and PP&L. The poles and lines could be placed along the existing road and firebreaks, making lines more accessible while decreasing the damage to natural habitat, artifacts, wildlife, and vegetation.

- D Along preferred route 2c, Bonneville Power, PP&L, and Benton REA already have existing lines. I am concerned about the health ramifications of voltage humming along the lines for those of us that live between your proposed 2c line and the Bonneville Power lines. I do not want to subject my family, employees, livestock, and crops to any detrimental health risks associated with overhead power exposure. In addition, the placement of this line through viable farm ground will decrease our land values, and decrease crop production. We need to protect one of our most important resources the American Farmer.
- E values, and decrease crop production. We need to protect one of our most important resources the American Farmer.

I respectfully propose that route 2c be scratched, and the U.S. Department of Interior Bureau of Land Management and PP&L consider other alternative routes that are more cost effective and have less impact on open and productive farm ground.

Sincerely,

Bradley J Martinez



Schurger, William <wschurge@blm.gov>

---

## Fwd: Vantage-Pomona transmission line comments

1 message

---

**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Fri, Mar 8, 2013 at 10:47 AM

To: William Schurger <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

----- Forwarded message -----

From: **carol martinez** <moxeecarol@gmail.com>

Date: Thu, Mar 7, 2013 at 7:53 PM

Subject: Vantage-Pomona transmission line comments

To: [blm\\_or\\_wn\\_mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)

Please add the attachment below to the comments about the new PP&L transmission line proposal.

Sincerely, Carol Martinez, 13391 State Route 24, Moxee, WA 98936 (509) 248-7967

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121



**PP&L Transmission line letter.doc**

28K

February 17, 2013

Re: PP&L Vantage-Pomona Transmission Line

A I should like to bring to your attention the undesirable consequences of the  
B preferred route proposal of this transmission line. This route will be very  
C expensive and this burden will be paid solely by the PP&L customers. This  
route also crosses many miles of private agriculture land some of which is  
under pivot irrigation and some in intensively producing orchards. Private  
residences will also be directly affected by this route.

D The initial proposed routing in 2008 was to follow the existing PP&L  
Pomona-Wanapum 230kv line across the Training Center (JBLM YTC) on  
the northern boundary. The Army now claims it will only allow an  
underground line. This of course would be outrageously expensive. Surely  
there must be some alternative engineering methods that will minimize the  
Army's concerns. For instance the distance between the right of ways of  
two power lines could be lessened by the addition of more towers in the  
longer spans of the existing line. (Distance between separate power lines is  
dependent on length of line between towers) Much of the existing line is  
located on high ridges and on sparse sage brush desert terrain. This northern  
area has traditionally been a buffer zone with very little observable activity.  
There are already three other power lines on the eastern edge of the YTC  
(Wind Ridge-Wanapum, Schultz-Wautoma and Schultz-Vantage). Every  
possible effort should be made to secure this route.

E In the event the YTC refuses to be a good neighbor and allow the northern  
crossing, a route following the southern boundary of the training center  
would be the next logical solution.

F Zone 2 South Side Why hasn't a route that continues to follow the Army  
boundary been studied? Why have there been detours around the DNR  
sections and BLM parcels instead of continuing along the boundary fence  
line as in the preceding 9 miles to the west? Sage grouse was mentioned  
G during the public meeting. Where are the studies for this claim? What is the  
number of birds involved and how much time do they spend in this area?  
What times of the year are they present? These lands are intensely grazed  
and we are not aware of any significant grouse population in the area.

There is a fire guard and roads already along the Army boundary which would reduce construction costs. This would also lessen construction impacts on any wild life habitat. There are no existing roads for the proposed routes in this area. Irrigated agriculture lands will also be affected. The eastern portion of the south route again follows the Army boundary for another 9 miles. Why doesn't the preferred route stay along the Army boundary all along the southern side? This area is again only a buffer zone for Army activities. The Army boundary route will be the least disruptive to private lands..

### Zone 3 EAST

The route along the old railroad right of way was rejected because of Indian artifacts. Why is it not possible to identify the most important artifacts/sites and either remove and relocate them or engineer the towers around them.

H The land between the towers will not be disturbed. There is an existing road way in the area already. The selection of the Grant county route will be very costly as many highly intense farming operations and residences will be drastically affected. Has PP&L made any estimation of the costs involved crossing this area?

I Lastly, the BPA has just given notice of intent to rebuild the Midway-Moxee 115 kv line. Why not change this to a 230 kv line and carry the power that PP&L needs to transport to the Yakima Valley, at least for that part of the way? PP&L was quoted in the 2/14/2013 Yakima Herald that they need a rate increase "to make up for the overall decline in electrical use that it attributes to the economic recession and consumers using more energy-efficient appliances".(Jan Mitchell, spokeswoman)

J So why do we need more transmission lines and why do we need to have our rates increase even more?

Respectfully submitted,

Carol Martinez, land owner and rate payer

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Susan Bangs  
751 Klocke Rd.  
Ellensburg, WA 98926

RECEIVED

MAR 11 2013

Bureau of Land Management  
WFO, Wenatchee, WA

March 8, 2013

BLM Wenatchee Field Office  
Attn: Vantage to Pomona Heights Transmission Line  
925 Walla Walla Ave.  
Wenatchee, WA 98802-1521

Public lands are to be managed in a manner that protects the resources and values present, and I would add, whether tangible or intangible.

The land can never go back from this kind of proposed project.

My belief is; the no-plan alternative, until buried cable is possible or other innovations arise, is the best choice.

Sincerely,

Susan Bangs

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Charles Lyall  
South Columbia Irrigation District - Board of Director  
Grand Coulee Hydro Electric Authority – Board of Director  
29249 Rd. O Sw.  
Mattawa, Wa. 99349  
509-830-3055

Subject; Vantage to Pomona Heights 230 kv Transmission Line Project

A My concern is with alternative 3c. It has many problems that I feel preclude it from being considered as the best alternative. It will track thru pristine farm ground that needs to be protected from unneeded and unwanted intrusion. This farm ground is some of the best, most expensive and most sought after pure farm ground in the state. Another power line in this area will detract from this valued asset. There are already many major power lines running across the slope that interrupt efficient farming and add danger to our operations. Alternative 3c as it is now, goes over the top of houses, major ponds, canals, orchards, vineyards, open ground, and alongside laterals, hay stacks, and equipment yards. This intrusion I believe is unacceptable considering the other better alternatives open to Pacific Core for the line.

Specific Concerns and Alternatives;

- B 1. Construction on private ground should be single pole to minimize their foot print.
- C 2. Line construction on laterals should be on the opposite side of the maintenance road.
- D 3. On all irrigated ground, design should allow for orchard trees of at least 16 feet in height to grow under the line.
- E 4. Construction should go along side or with existing lines to minimize foot print.
- F 5. Existing structures (houses, Shops, buildings) must be avoided.
- G 6. Irrigation equipment (circles, pumps, structures) have to be avoided and not interrupted during use.
- H 7. Maintenance must be done with owner's permission due to new food safety rules.
- I 8. Weed control is a major must and all herbicide use reported to land owner.

J  
K  
L  
M Another concern is the route going across the river and up the mountain on the south side of the Columbia River. This part of the line should go straight south from N road to the east of Midway Substation and up the hill next to existing lines. If 3c is approved as is it will denigrate the existing pristine view of the mountain. Add habitat and environmental concerns. It goes to close to an existing cellphone tower affecting a vital service. A new line in that area will also be an added risk to the military training jets that use that corridor on a regular bases.

N Conclusion: The best alternative is to go across the Firing Center or up the rail road write away.  
1. Willing land owner  
2. Shorter rout  
3. Less impact

RECEIVED

MAR 11 2013

Bureau of Land Management  
WFO, Wenatchee, WA

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Confederated Tribes and Bands of the Yakama Nation  
Established by the Treaty of June 9, 1855

Post Office Box 151  
Toppenish Washington 98948

RECEIVED

FEB 04 2013

Bureau of Land Management  
WFO, Wenatchee, WA

January 7, 2013

Bureau of Land Management  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521

Subject: Draft Environmental Impact Statement for the Vantage Pomona Heights 230 kV Transmission Project (DOI-BLM-OR\_134-2013-0002-EIS)

The Yakama Nation Cultural Resources Program (CRP) has received and reviewed the *Draft Environmental Impact Statement (DEIS) for the Vantage Pomona Heights 230 kV Transmission Project*. As an active participant in the project, the Yakama Nation CRP has indicated its significant interest and concern for cultural resources in the project area located within Yakama Ceded Lands.

- A Archaeological surveys have been conducted by our office on federal lands within proposed Routes 1b, 3a, and 3c; and 31 newly identified archaeological sites associated with Native American and historic land use have been recorded. The number of sites are likely to increase as surveys proceed within these routes and the other proposed routes once land access is granted.
- B Yakama Nation CRP concurs with the Agency Preferred Route 3c and Route 2c over the alternatives Route 3b and Route 2b, respectively. However, while the alternative Route 3c is preferred to Route 3b,
- C impacts to cultural resources on Lower Crab Creek and Saddle Mountains remain a concern. In addition, Yakama Nation CRP would like to highlight that there are no proposed alternatives to Routes 1a, 2a, and
- D 2d which is concerning and may be problematic. Route 2d may impact a Yakama TCP and no alternatives
- E are proposed for this route (which is entirely within private lands).

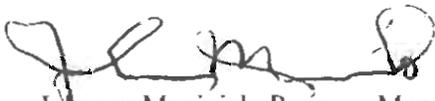
In review of the Vantage-Pomona DEIS, Yakama Nation CRP has identified the following additional concerns:

- F • Page ES-iv states that cultural resources were “inventoried at 75 feet and 250 feet from the assumed route centerlines . . .” Utilization of the word “inventoried” in this context is confusing and misleading as the term is often used within the archeological community to indicate survey. Please change the language to reflect that background database research was conducted.
- G • Page ES-iv discusses visually sensitive resources. Yakama Nation Traditional Cultural Properties including legendary, monumental, ceremonial, traditional use, burial sites, and spiritual sites are cultural resources that are highly susceptible to visual impacts.
- H • Page 3-166; 3.11.4, Route Segment or Zone-Specific Considerations: Please specify in sections 3.11.4.1 through 3.11.4.3 that archeological survey has been extremely limited. Portions of the proposed project have not undergone archeological investigation. For unsurveyed portions of the project it is more accurate to report that there is no data, rather than state that there are no archeological resources.

- Page 4-183; 4.11.4. Impacts to Specific Route Segments: Yakama Nation CRP is in the process of surveying portions of the Vantage-Pomona APE. Numerous sites have been found to date and will be provided to the Bureau of Land Management in the near future. Please note that this new data will render information in sections 4.11.4 inaccurate. Many new archaeological resources have been identified within several route segments noted in the DEIS as "low impact" or "no impact".

Yakama Nation CRP looks forward to working with the BLM in identifying potential impacts to Yakama TCPs, so these resources may be protected in perpetuity for future generations. Yakama Nation CRP will continue to be in contact with BLM regarding cultural and archaeological resources. If you have any questions, feel free to contact me at ext 4737 or Archaeologists Jessica Lally at ext 4766 (jessica@yakama.com) or Corrine Camuso at ext 4776 (ccamuso@yakama.com).

Sincerely,



Johnson Meninick, Program Manager  
Cultural Resources Program

CC: Harry Smiskin, Yakama Nation Tribal Council Chairman  
Ruth Jim, Yakama Nation Cultural Committee Chairwoman  
Kate Valdez, Yakama Nation Tribal Historic Preservation Officer  
Rob Whitlam, State Archeologist, Washington State DAHP

From: **Lewis, Stephen** <[stephen\\_lewis@fws.gov](mailto:stephen_lewis@fws.gov)>  
Date: Fri, Feb 15, 2013 at 4:41 PM  
Subject: Vantage to Pomona Heights EIS (FWS Comments)  
To: [OR Wenatchee Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)  
Cc: Jessica Gonzales <[Jessica\\_Gonzales@fws.gov](mailto:Jessica_Gonzales@fws.gov)>

Thank you for the opportunity to comment on the subject EIS. Attached for your consideration are the U.S. Fish and Wildlife Service's comments pertaining to the proposed Vantage to Pomona Height Transmission Line. Please feel free to contact me if you have questions pertaining to these comments.

Steve Lewis

\*\*\*\*\*

Stephen T. Lewis  
Hydropower and Energy Coordinator  
US FISH AND WILDLIFE SERVICE  
CENTRAL WASHINGTON FIELD OFFICE  
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WENATCHEE, WA 98801-8122  
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*"If a road has no obstacles, it probably doesn't lead to anywhere." S. Lewis*



# United States Department of the Interior



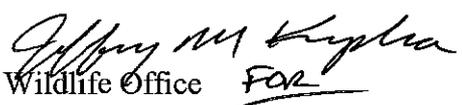
**FISH AND WILDLIFE SERVICE**  
**Washington Fish and Wildlife Office**  
Central Washington Field Office  
215 Melody Lane, Suite 103  
Wenatchee, WA 98801-8122

IN REPLY REFER TO:  
USFWS Reference: 13410-2013-CPA-0030  
Hydrologic Unit Code: 17-02-00-16-05

February 15, 2013

## MEMORANDUM

To: Linda Coates-Markle, Field Manager, Bureau of Land Management  
Wenatchee, WA

From:   
Manager, Washington Fish and Wildlife Office FOR  
Lacey, Washington

Subject: U.S. Fish and Wildlife Service Comments on the Vantage-Pomona  
Transmission Line Project Draft Environmental Impact Statement.

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Statement (DEIS) for the proposed Vantage-Pomona Transmission Project (Project). The project area is situated in south-central Washington State, extending from the Bonneville Power Administration's Vantage substation, just east of the Wanapum Dam in Grant County, to Pacific Power's Pomona Heights substation near Selah, Washington. A total of eight transmission line route alternatives are considered in the DEIS, along with the "No Action" alternative. Alternative D is the Bureau of Land Management preferred alternative. The eight end-to-end route alternatives range from 61 to 67 miles in length and cross portions of Benton, Grant, Kittitas, and Yakima Counties. These comments are provided in accordance with the provisions of the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 *et seq.*), as amended; the Fish and Wildlife Coordination Act (FWCA) (16 U.S.C. 661 *et seq.*), as amended; the Endangered Species Act (ESA) (16 U.S.C. 1531 *et seq.*), as amended; and the Federal Power Act (FPA) (16 U.S.C. 791-828c *et seq.*), as amended.

### General Comments

The Service has numerous aquatic and terrestrial concerns related to the proposed Project; however, the effect of the proposed Project on the Greater sage grouse (*Centrocercus urophasianus*) (sage grouse) is one of our greatest. Currently there are two relatively isolated sage grouse populations remaining in Washington. One population is found in Douglas and Grant counties, predominantly on private land. The other population is found on the federally managed JBLM-Yakima Training Center in Kittitas and Yakima counties which, together with the Hanford site, comprise the largest block of shrub steppe remaining in Washington. These sage grouse populations are isolated from surrounding populations in Idaho and Oregon.

The reduction in sage grouse numbers and distribution in Washington is primarily attributed to loss and degradation of habitat through conversion to agriculture and other land uses. Before the arrival of early settlers, the climax condition in the shrub steppe region of eastern Washington consisted of large tracts of native sagebrush and bunchgrass species. Agricultural expansion, overgrazing, sagebrush control through burning, mechanical removal, and chemical control severely degrade sage grouse habitat. Approximately 40% remains of the estimated 4.16 million hectares (10.4 million acres) of shrub steppe that existed in eastern Washington before European settlement. Sage grouse habitat is a subset of this remaining acreage, and factors affecting occupancy include elevation, slope, soil type, size of shrub-steppe patch, habitat quality, and disturbance.

The sage grouse population and corresponding sage grouse habitat in Washington has declined significantly. The sage grouse's range has declined to about 8 - 10 % of historic range. Local populations were extirpated as recently as the mid-1980's. Major threats that remain to the two small populations include the potential for catastrophic fire, impacts of military training, impacts of intensive grazing, continued conversion of shrub steppe to cropland or residential development, and the uncertain long term future of the federal Conservation Reserve Program.

Sources of mortality of sage grouse include predation, weather, accidents, fences, disease and parasitism, and environmental hazards such as pesticides. These natural and man-influenced factors become more important management issues for small populations. Predation is a limiting factor throughout the annual sage grouse cycle, but its severity depends on habitat quality. Raptors and coyotes are the primary predators of sage grouse, while corvids, badgers, and ground squirrels are the most important nest predators. Weather can influence nesting success and survival of young chicks. Some fences, if located near sage grouse or their habitat, can be a significant source of mortality if not adequately marked. Diseases and parasites do not appear to be a significant source of mortality, with the exception of West Nile Virus, which is currently not an issue in Washington.

Sage grouse have survived in Washington because portions of the land in Douglas County are poorly suited to agriculture, and military ownership of the JBLM-Yakima Training Center prevented agriculture and most other development. Sage grouse habitat has improved on private lands under the federal Conservation Reserve Program. Sage grouse populations have increased in Douglas County since 1992, which may be a result of improving habitat conditions or the cyclical nature of sage grouse populations evident in past years.

We appreciate the efforts to survey sage grouse along the proposed alternatives and the associated data resulting from these surveys which was included in the DEIS. Many of the action alternatives appear to indicate minimal sage grouse activity along the proposed routes; however, these types of data should also highlight the perilous nature of this sage grouse population and the potential effects resulting from the proposed Project in the Final Environmental Impact Statement (FEIS).

## Alternative Analysis

As you are aware, we met with your staff and the staff of Pacific Power during the spring and summer of 2011, to tour the proposed route alternatives (including any proposed river crossings) and to discuss ways to minimize the effect of the proposed transmission line on aquatic and terrestrial resources. We also discussed the development of mitigation measures in the event the proposed Project is constructed to its current form and function. Based on the project description information provided to us in the DEIS, it appears the best alternative is the one that places the new transmission line the furthest point south of the Yakima Training Center and through agriculture lands located east of the Columbia River, specifically alternative D. Alternative D appears to provide the lowest level of impact to sage grouse, plus this route crosses already developed agricultural lands; however, this alternative may pose additive effects to the Yakima Training Center sage grouse population through future energy development opportunities (i.e., wind power) created by the placement of this transmission line

- A We are concerned about possible resource impacts (i.e., sage grouse) from creating a new corridor for this transmission line based on all the information associated with the action alternatives. To minimize the scope and extent of these potential resource impacts, we
- B recommend the Project to include best management practices which limit compaction and disruption of sediments, in addition to the minimal removal of sagebrush steppe habitat.
- C Noxious weed introduction and spread is also a major concern of the proposed transmission line. We recommend that all noxious weed recommendations specified in all applicable state and county weed regulation are followed to the extent practicable. This should include preventing and eradicating any weed populations introduced from the construction, and reestablishing robust native plant communities.

- D During our scoping meetings in 2011, we requested Pacific Power to examine the feasibility of locating portions of the proposed transmission line underground within the context of the DEIS to minimize effect of the project on sage grouse. After review of the DEIS, we see that this type of analysis was only conducted to place the entire transmission line underground. While we appreciate this scale of analysis, expense, and the technology associated with the placement of transmission lines underground, we recommend that the FEIS examine how the placement of discrete sections of the transmission line would result in the retention of habitat corridors for terrestrial species such as sage grouse. We would also recommend that the FEIS analyze the extent of any additive effects to sage grouse resulting from the Project alternatives
- E that either includes a single transmission line corridor or locating portions of the proposed transmission within close proximity to existing lines. Based on our review of the document, it's our understanding that this type of additive effects analysis as it relates to sage grouse is not sufficient in the DEIS.

## Mitigation of Project Impacts

- F Our review of the DEIS leads us to the conclusion that appropriate mitigation for sage grouse has not been analyzed or proposed if the Project is to be constructed based on the proposed action alternatives. For example, the southern boundary of the Yakima Training Center likely serves as a habitat corridor for sage grouse. The current design of the action alternatives

appears to lack an emphasis on promoting this habitat corridor. For further information regarding the importance of habitat connectivity for species such as the sage grouse, please refer to the *Washington Connected Landscapes Project: Columbia Plateau Ecoregion Analysis* (<http://waconnected.org/columbia-plateau-ecoregion/>). We also find that there is no mention of potential land purchase to offset the scope and nature of the Project. To accommodate these types of mitigation measures, we suggest the FEIS be comprised of the following mitigation approach:

The Project's design should adhere to the following standard hierarchy for mitigation:

1. *Avoidance*: Measures taken to prevent damage to ecosystem services from the outset of a project (e.g. spatial or temporal placement of infrastructure to prevent the degradation of wildlife habitat). A specific Project example is designing the Project's features and operations to avoid impacts to sage-grouse Core Habitat and, to the extent practicable, Low Density and Preliminary General Habitat areas.
2. *Minimization*: Measures taken to reduce the duration, timing, intensity and/or extent of impacts that cannot be completely avoided. A specific Project example includes efforts to minimize Project impacts in sage-grouse habitats by using seasonal timing stipulations for construction.
3. *Rehabilitation / Restoration*: Measures taken to rehabilitate degraded ecosystems or restore cleared ecosystems following exposure to impacts that cannot be completely avoided and/or minimized. A specific Project example is restoration of sage-grouse habitats impacted during construction activities.
4. *Compensatory Mitigation (also referred to as "offset")*: Measures taken to compensate for any remaining adverse impacts that cannot be avoided or minimized in order to achieve no net loss or a net gain of ecosystem services. Compensatory mitigation can include the restoration of degraded ecosystems, improvement of marginal ecosystems, protection of threatened ecosystems, or a combination thereof. Offsets can occur in the form of the following types:
  - a. "in-kind", involving replacement or substitution of resources that are of the same type and kind as those being impacted;
  - b. "out-of-kind" involving replacement or substitution of resources that result in different habitat structure and function that may benefit the species other than those existing at the site prior to disturbance;
  - c. "off-site" involving mitigation actions outside the boundary of the project; and
  - d. "mitigation bank" means habitat that is restored, created, or enhanced for the purpose of selling habitat credits in exchange for anticipated unavoidable future habitat losses due to development actions; and
  - e. "in-lieu fee" program devoted to providing mitigation.

For this Project, sage-grouse habitat impacts likely will occur within several sagebrush habitat types, which require a variety of mitigation actions to achieve "no net loss with a net benefit" for sage-grouse habitat impacts. The following principles and standards (P&S), as well as the

remainder of this blueprint, focus on the last step of the mitigation hierarchy and will inform the development of sage-grouse compensatory mitigation actions for the Project. The P&S serve as guidance for:

1. Determining the types and amounts of development action impacts and associated mitigation obligations; and
2. Selecting the habitat restoration, enhancement, protection and other management actions necessary to satisfy the project's mitigation obligations.

Project mitigation actions that substantially deviate from these P&S may not be adequate or supportable in terms of issues related to sage-grouse. However, given the BLM's current national planning effort and continuing research on sage-grouse, other mitigation requirements and/or options may be identified in the future. Potential future actions should be considered and included in a Project-specific habitat mitigation plan where appropriate.

### Eagle Conservation Plans

We would also like to direct your attention to other avian resources which may interact with the proposed Project. For example, based on information collected by Grant PUD during the relicensing of the Priest Rapids Hydroelectric Project, bald eagles, golden eagles, and other raptor species frequent the Columbia River within close proximity of the proposed Project (DES 2001). The proposed project location is also within a landscape interspersed with numerous smaller-scale wetlands that may hold surface water during years of high precipitation, potentially supporting water-dependent birds. Due to the potential to affect avian resources which fully utilize the proposed project location, we strongly urge the Project proponent to complete an Eagle Conservation Plan (ECP) to minimize the incidents of eagle fatality associated with the Project's infrastructure. Information on ECPs can be found via this link to the Service's website (although note that a revised version is forthcoming): [http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html).

Such a document should include mortality monitoring with elevated monitoring efforts during years of high precipitation, when local wetland basins are flooded. Your ECP also should convey tangible commitment to prompt response in implementing strategies for reducing risk of injury and fatality, including appropriate operational modifications, in the event that multiple eagle fatalities or injuries occur.

The ECP could be incorporated into a general Bird and Bat Conservation Strategy (formerly known as an Avian and Bat Protection Plan) that would identify and address conservation concerns of other species of migratory birds and bats known or likely to occur at the Project, which we did not consider in our consultations and review of associated documents. In general, the Migratory Bird Treaty Act and its implementing regulations (Title 50, Code of Federal Regulations, Part 21 [50 CFR 21]) do not provide for issuance of permits that authorize take of migratory birds that may be killed or injured by otherwise lawful activities, such as energy generation by wind turbines or transmission. Currently, the list of federally protected migratory birds includes 1,007 species (50CFR Part 10.13). We suggest you give particular attention to Birds of Conservation Concern (BCC) species known or likely to occur

in the area. BCC species include those exhibiting significant population declines and may become candidates for listing under the ESA unless threats to their populations are reduced. You can learn more about the Service's BCC list at: [http://www.fws.gov/migratory\\_birds/CurrentBirdIssues/Management/BCC.html](http://www.fws.gov/migratory_birds/CurrentBirdIssues/Management/BCC.html). You can also learn more about the Service's Final Land-Based Wind Energy Guidelines at: <http://www.fws.gov/habitatconservation/wind.html> . These guidelines include transmission lines for interconnection to the transmission system.

The ECP we recommended for the Project would be voluntarily prepared and implemented as a good-faith effort. Nonetheless, it is not possible for the Service to absolve individuals, corporations, or agencies from liability, even if they implement avian mortality avoidance or similar conservation measures. There is no threshold for the number of migratory birds or ESA-listed species taken at transmission sites beyond which the Service will initiate enforcement action, although the Service's Office of Law Enforcement focuses its resources on investigating and prosecuting individuals and companies that take migratory birds or ESA-listed species without regard for their actions or without taking effective steps to avoid or minimize take. As additional evidence of its continuing good-faith efforts, Douglas PUD and BPA may voluntarily report migratory birds injured or killed in association with construction, infrastructure, and operation of the Project, as well as any actions taken to address such events to the Service's Bird Injury and Mortality Reporting System (BIMRS), maintained by the Service's Office of Law Enforcement. To enter the Project in the database and to set up an account for reporting purposes, visit the BIMRS website at <https://birdreport.fws.gov/>.

#### Threatened and Endangered Species Consultation

Section 7 of the Endangered Species Act (ESA) and its implementing regulations (at 50 CFR Part 402) require Federal agencies to review their actions at the earliest possible time to determine whether any action may affect listed species or critical habitat. If effects to federally-listed species may occur as a result of the Project, consultation with the Service is required.

Listed species are likely to occur in the project area. We recommend that the BLM enter into consultation with the Service to consider both immediate and ongoing effects associated with the Project. Due to the presence of sage grouse in the project area, we also recommend conferencing on sage-grouse. A list of threatened and endangered species likely to occur in Benton, Grant, Kittitas, and Yakima counties and under the purview of the Service can be found at: [http://www.fws.gov/wafwo/species\\_EW.html](http://www.fws.gov/wafwo/species_EW.html)

The BLM should prepare a Biological Assessment (BA) to evaluate the potential effects of the Project on listed species and determine whether any such species are likely to be adversely affected by the action. We recommend that the BLM obtain a current list of ESA species in the project area from the Service website shown above. Under 50 CFR 402.08, the BLM may designate Pacific Power as its nonfederal representative to conduct consultation or prepare a BA. If the BA is prepared by the designated non-federal representative, the BLM must furnish guidance and supervision, and must independently review and evaluate the scope and contents of the BA. The ultimate responsibility for compliance with ESA section 7 remains with the BLM.

## Specific Comments

- M 1.) Protection of Endangered Species, Page 1-14: This section is unclear regarding the protection of endangered species in the project area. The DEIS states that a “grant of right of way by BLM or JBLM-Yakima Training Center” somehow leads to the protection of Endangered Species.
- N 2.) Section 2.5.2 Biological Resources (page 2-46): Sub-section “Bio-2” refers to “Mitigation measures developed during the consultation period under Section 7 of the Endangered Species Act...” Please remove the reference to “mitigation measures” and replace with “terms and conditions” to more accurately represent the measures resulting from any biological opinion that the Service may issue for this project.
- O 3.) Section 3.3.2.2 Federally Threatened, Endangered and Candidate Species (page 3-34): We disagree with the use of the reference BioAnalysts, Inc. 2002 as discussed in this section for bull trout. BioAnalysts, Inc. 2002 is a study that examined the behavioral attributes of bull trout as they migrated upstream and downstream through the mid-Columbia River public utility district-owned hydroelectric projects. We recommend deleting this reference since the context of this section specifically refers to spawning and rearing habitat.
- P 4.) Section 3.3.2.3 Species of Concern and State-Listed Species (Pacific Lamprey) (page 3-41): We disagree with the statement, “Relatively little is known about the status of lamprey species within the Columbia River Basin.” Extensive studies resulting from the relicensing of the Priest Rapids, Wanapum, Rocky Reach, and Wells hydroelectric projects have been conducted to assess upstream and downstream passage of Pacific lamprey through these respective projects. Due to the proximity of the Project, we recommend contacting Public Utility District No. 1 of Grant County, owner and operator of the Priest Rapids Hydroelectric Project, to assess their collection of Pacific lamprey studies and the potential for impacts resulting from the Project. Please include relevant information regarding Pacific lamprey in the FEIS.
- Q 5.) Wormskiold’s Northern Wormwood, (page 4-11): The depiction of effects to northern wormwood is not accurate. The statement, “It is anticipated that no impacts would occur to Wormskiold’s northern wormwood or its habitat” is based on a plant protection plan that has yet to be developed by the applicant. We suggest inserting language into this section that suggests “impacts may occur” in the event sedimentation results from the construction of the water crossing associated with alternative 3B.
- R 6.) Section 4.3.3.3 Federally Threatened, Endangered and Candidate Species (Bull Trout) (pages 4-44 and 4-45): This examines how possible erosion created by the placement of approximately 200-foot-tall lattice steel structures for the up to 2,800 foot river crossing will be minimized by various erosion and control methods. To minimize the continuing effect of erosion and sedimentation on bull trout in the mid-Columbia

River, we request the FEIS to include measures to rehabilitate these sites once the construction for this river crossing has been completed.

- S 7.) Section 4.2 2011 Survey, (page B-1-10): Please specify when and if the 2011 sage grouse surveys were conducted prior or after military activities were conducted on the Yakima Training Center. As currently stated, there is no mention as to how or if military activities on the Yakima Training Center influenced the results of these surveys.
- T 8.) Section 4.17.4.2 Geographic Scope (page 4-273): We are concerned that no apparent analysis of indirect effects to sage grouse resulting from the Project are assessed in the DEIS. The construction and installation of transmission infrastructure for the proposed action alternatives will likely result in some level of alteration of sage grouse behavior patterns in the project area. We strongly urge the FEIS to include pertinent analysis related to this type of indirect effect.
- U 9.) Table 4.17-1 Past, Present, and Reasonably Foreseeable Future Actions by Affected Resource (page 4-275): Please include the Bonneville Power Administration's Midway-Moxee Transmission Line Rebuild Project into this table.

#### Summary Comments

The Service advocates alternative D with the understanding that this alternative may pose additive effects to the Yakima Training Center sage grouse population through future energy development opportunities (i.e., wind power) created by the placement of this transmission line. We do not object to alternative D provided our DEIS comments to protect, mitigate, and enhance fish and wildlife resources are incorporated into the FEIS for the Project. We look forward to working with the BLM, Washington Department of Fish and Wildlife (WDFW), and other parties involved in the NEPA process to produce a project that conserves and develops existing fish and wildlife resources and other environmental values. However, the opportunity to amend, modify, or add to these DEIS comments is reserved if resource conditions change, project plans are altered, or new information is developed.

Please contact Steve Lewis, Fish and Wildlife Biologist, Central Washington Field Office by phone at 509-665-3508 ext. 2002, or by e-mail at [Stephen\\_Lewis@fws.gov](mailto:Stephen_Lewis@fws.gov) for questions regarding the Project and associated development of studies to assess the route alternatives. Again, thank you for including us in the review of this proposal. We also encourage you to continue coordination of the Project with the WDFW.

CC:

Estyn Mead, USFWS, Regional Office, Portland, OR  
Mark Teske, WDFW, Yakima, WA

LITERATURE CITED:

Duke Engineering and Services (DES) 2001. Transmission Line Studies, Priest Rapids Project, FERC 2114, Final Report. Prepared for Public Utility District No. 2 of Grant County. Prepared by Duke Engineering and Services, Bellingham, WA. 47pp.



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

RECEIVED

FEB 19 2013

Bureau of Land Management  
WFO, Wenatchee, WA

February 14, 2013

EIS Project Manager  
BLM Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521

Re: Vantage to Pomona Heights EIS

Dear Project Manager:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Vantage to Pomona Heights 230 kV Transmission Project. We have reviewed the documents and have the following comments.

### TOXICS CLEAN-UP

- A If contamination is observed during the project, sampling of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily visible, or is revealed by sampling, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Central Regional Office at (509) 575-2490 if contamination is encountered.

If you have any questions or would like to respond to these Toxics Clean-up comments, please contact **Valerie Bound** at (509) 454-7886.

### WATER QUALITY

- B Proper erosion and sediment control practices must be used on the construction site and adjacent areas to prevent upland sediments from entering surface water. Local stormwater ordinances will provide specific requirements. Also refer to the Stormwater Management Manual for Eastern Washington ([http://www.ecy.wa.gov/programs/wq/stormwater/eastern\\_manual/manual.html](http://www.ecy.wa.gov/programs/wq/stormwater/eastern_manual/manual.html)). All ground disturbed by construction activities must be stabilized. When appropriate, use native vegetation typical of the site.

Any operation which would generate a waste discharge or have the potential to impact the quality of state waters, must receive specific prior authorization from the Department of Ecology as provided under Chapter 90.48 RCW, Chapter 173-216 WAC, Chapter 173-220 WAC, Chapter 173-200 WAC and Chapter 173-201A WAC.

Routine inspections and maintenance of all erosion and sediment control Best Management Practices (BMPs) are recommended both during and after development of the site.

A Stormwater Pollution Prevention Plan for the project site may be required and should be developed by a qualified person(s). Erosion and sediment control measures in the plan must be implemented prior to any clearing, grading, or construction. These control measures must be effective to prevent soil from being carried into surface water by stormwater runoff. Sand, silt, and soil can damage aquatic habitat and are considered pollutants. The plan must be upgraded as necessary during the construction period.

Proper disposal of construction debris must be in such a manner that debris cannot enter the natural stormwater drainage system or cause water quality degradation of surface waters. Dumpsters and refuse collection containers shall be durable, corrosion resistant, nonabsorbent, non-leaking, and have close fitting covers. If spillage or leakage does occur, the waste shall be picked up immediately and returned to the container and the area properly cleaned.

The operator of a construction site that disturbs one acre or more of total land area, and which has or will have a discharge of stormwater to a surface water or to a storm sewer, must apply for coverage under Department of Ecology's Construction Stormwater General Permit.

Owners of sites where less than one acre of total land area will be disturbed must also apply if the construction activity is part of a larger plan of development or sale in which more than one acre will eventually be disturbed. Discharge of stormwater from such sites without a permit is illegal and subject to enforcement action by the Department of Ecology.

Application should be made at least 60 days prior to commencement of construction activities. A permit application and related documents are available online at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction>; or by contacting the Water Quality program, Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600; (360) 407-6401.

Sincerely,



Gwen Clear  
Environmental Review Coordinator  
Central Regional Office  
(509) 575-2012



Schurger, William <wschurge@blm.gov>

**Re: I am away from the office from February 19 to March 1, 2013; I will respond to your message when I return. Re: BLM's Vantage-Pomona Heights 230kV Transmission Line Project**

1 message

**Morlock, Dale** <dale\_morlock@nps.gov>  
To: "Schurger, William" <wschurge@blm.gov>

Tue, Feb 19, 2013 at 2:02 PM

William,

Heather Ramsay, PWRS, issued the following data to our lead PWRO Office but the office did not forward to your office. If you have any questions, Heather's data is attached if you need to contact her.

According to their DEIS ([http://www.blm.gov/or/districts/spokane/plans/files/VPH\\_230kV\\_Draft\\_EIS.pdf](http://www.blm.gov/or/districts/spokane/plans/files/VPH_230kV_Draft_EIS.pdf)) the Washington Department of Fish and Wildlife's Columbia Basin State Wildlife Area is within the project area.

A A portion of this site, specifically the **Lower Crab Creek unit**, is protected by LWCF. If any of their final routes will impact this site, they'll need to coordinate their NEPA activities with NPS.

**Heather Ramsay, Program Officer, National Park Service, State & Local Assistance Programs, 909 First Avenue, Seattle, WA 98104-1060 Telephone: (206) 220.4123 email: [heather\\_ramsay@nps.gov](mailto:heather_ramsay@nps.gov)**

On Tue, Feb 19, 2013 at 1:17 PM, Schurger, William <wschurge@blm.gov> wrote:

—  
\*William Schurger\*  
\*Realty Specialist\*  
\*BLM-Wenatchee Field Office\*  
\*509/665-2100\*



**Dale A. Morlock**

Environmental Quality Division  
NPS ER2000 Program (External EIS's)  
Phone: Michigan (616) 548-5123  
email: [Dale\\_Morlock@nps.gov](mailto:Dale_Morlock@nps.gov)

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From: **Kristina Proszek** <[kris@yakama.com](mailto:kris@yakama.com)>

Date: Tue, Feb 19, 2013 at 2:25 PM

Subject: Yakama Nation's Comments on the Vantage to Pomona Heights Draft EIS

To: "[blm\\_or\\_wn\\_mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)" <[blm\\_or\\_wn\\_mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)>

Cc: "[rbailey@blm.gov](mailto:rbailey@blm.gov)" <[rbailey@blm.gov](mailto:rbailey@blm.gov)>, Phil Rigdon <[prigdon@yakama.com](mailto:prigdon@yakama.com)>

Good afternoon,

Please see Yakama Nation's comments attached regarding the Vantage to Pomona Heights Draft EIS. The original will be placed in the mail to Ms. Coates-Markle today.

Thank you,

Kristina Proszek

Environmental Review Coordinator

Yakama Nation

(509) 865-5121 x. 6074

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From: **WN\_Mail, BLM\_OR** <[blm\\_or\\_wn\\_mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)>  
Date: Tue, Feb 19, 2013 at 1:54 PM  
Subject: Re: Comments on Vantage to Pomona Transmission Line Project  
To: "GAMON, JOHN (DNR)" <[JOHN.GAMON@dnr.wa.gov](mailto:JOHN.GAMON@dnr.wa.gov)>

Due to submission concerns the BLM has pushed the DEIS comment period back to March 8th for the public's convenience. Please e-mail your comments when they are finalized before then.

Thank you for your interest,

On Tue, Feb 19, 2013 at 1:48 PM, GAMON, JOHN (DNR) <[JOHN.GAMON@dnr.wa.gov](mailto:JOHN.GAMON@dnr.wa.gov)> wrote:

To Whom:

It is my understanding that today is the last day to submit comments on DEIS for the above-mentioned project. I am writing this email to request an extension of a couple of days. I have had staff reviewing the project, but we will not be able to finalize our comments and submit them by the end of today. If it is not possible to get an extension, please let me know and I will try to pull together what I can.

Thanks for considering my request.

Sincerely,

John Gamon, Manager

Natural Heritage Program

Washington State Department of Natural Resources

1111 Washington Street SE

Olympia, Washington 98504-7014

(360) 902-1661

[john.gamon@dnr.wa.gov](mailto:john.gamon@dnr.wa.gov)

--

BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
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915 Walla Walla Ave.  
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Fax: 509-665-2121



January 19, 2013

Bureau of Land Management  
WFO, Wenatchee, WA

FEB 22 2013

RECEIVED

Linda Coates-Markle, Field Manager  
Bureau of Land Management  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801

Re: Vantage to Pomona Heights Transmission Line Draft EIS

Dear Ms. Coates-Markle:

Thank you for your letter dated January 30, 2013 and for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Vantage to Pomona Heights Transmission Line, as well as for your previous offer to be engaged as a Cooperating Agency. As you are well aware, Yakama Nation has expressed considerable concerns and requests to the Bureau of Land Management (BLM) regarding the proposed Vantage to Pomona Heights Transmission Line that would be located within our Ceded Lands. We are pleased to learn that BLM selected the only route Yakama Nation preliminarily considered an appropriate alternative for your consideration as the Agency Preferred Route that was evaluated in the DEIS and we greatly appreciate that you have honored the recommendations set forth by Yakama Nation Tribal Council documents and by Yakama Nation staff.

A Regardless of the Preferred Route selected in the DEIS, Yakama Nation cannot concur with a final selected route until all necessary cultural resource surveys are completed and all cultural resources are protected. Additionally, it was Yakama Nation's understanding that the purpose and need of the proposed Vantage to Pomona Heights 230 kV Transmission Line was to ensure reliability of the transmission network in the Mid-Columbia area (DEIS, p. 1-7) and not to allow further transmission capacity for wind energy and other development in the area. However on p. 4-281, the DEIS states that EDP Renewable (Horizon Wind Energy) has submitted a development application to BLM for a wind energy project including up to 150 turbines in the western half of the Saddle Mountains. Figure 4.17-1 shows that the proposed Vantage to Pomona Heights Transmission Line would go through several Sections of the proposed Saddle Mountain Wind Farm. On the same page (4-281), the DEIS states that the project is 50 miles east of the Vantage to Pomona Heights Transmission Line Project and therefore due to its distance from the Project area, the Saddle Mountain Wind Farm is not considered in the cumulative analysis. This contradiction needs to be clarified.

B As previously expressed to BLM during the May 17, 2012 Preferred Route Selection Workshop and to the Bonneville Power Administration on several occasions, Yakama Nation expects that all

National Environmental Policy Act analyses for proposed transmission lines will include the direct and cumulative effects of all wind energy and other energy development projects that will connect to the transmission line. Yakama Nation expects that the above discrepancies will be clarified and that all necessary analyses will be completed prior to issuing a Final EIS.

In addition to the concerns expressed by the Yakama Nation Cultural Resources Program to BLM regarding the Vantage to Pomona DEIS (letter dated January 7, 2013), Yakama Nation submits the following additional comments specific to the DEIS:

- C • Yakama Nation tribal members hunt and gather roots on the Yakima Training Center (YTC) adjacent to Route Segment 1b. As previously communicated to BLM during the May 17, 2012 Preferred Route Selection Workshop, these are cultural activities, not recreational activities. The DEIS considers these recreational activities and not cultural activities. This distinction needs to be made in the Final EIS.
- D • There is no assessment in the DEIS as to how the project would affect hunting and root gathering that takes place within the YTC near segment 1b in either Chapter 3 or 4 of the DEIS. This assessment should be conducted and included in the Final EIS.
- E • Also during the May 17, 2012 workshop, a representative from the Wanapum expressed concern that YTC would require lighting on the transmission poles within route segment 1b of the project. There is no discussion of this in the DEIS. Per Chapter 4, adverse effects include "introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." The impact of the introduction of lighting to an area used for traditional activities should be addressed in the Final EIS.

F To ensure protection of Yakama Nation's cultural and natural resources, I would like to request that BLM meets with our Cultural, Roads, Irrigation & Land, and Fish, Wildlife, Law & Order Committees once a Final EIS has been prepared and prior to issuing a Record of Decision. If Yakama Nation's concerns will not be fully addressed at the Yakama Nation Tribal Council Committee-level, Yakama Nation reserves the right to enter into government-to-government consultation with BLM. Given Yakama Nation and BLM's communication on this project to date, I am hopeful that any outstanding concerns and conflicts would be resolved at the Committee-level.

Thank you for your time and consideration. We look forward to your response. If you have any questions or wish to arrange a meeting, please feel free to contact Philip Rigdon, Deputy Director of Natural Resources at (509) 865-5121 x. 4655.

Sincerely,

  
Harry Smiskin, Chairman  
Yakama Nation Tribal Council



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

FEB 19 2013

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

RECEIVED

FEB 22 2013

Bureau of Land Management  
WFO, Wenatchee, WA

Linda Coates-Markle  
Field Manager  
Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

Re: Comments on the Draft EIS for Vantage to Pomona Heights Transmission Line Project (EPA Project Number: 10-002-BLM).

Dear Ms. Coates-Markle:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the US Environmental Protection Agency has reviewed the Bureau of Land Management Draft Environmental Impact Statement for the proposed **Vantage to Pomona Heights Transmission Line Project** in Grant, Benton, Kittitas, and Yakima Counties, Washington.

The DEIS analyzes potential environmental impacts associated with a proposal to grant a right-of-way to construct, operate, and maintain a new 230 kV transmission line and associated facilities on public lands administered by the BLM in Yakima, Kittitas, Benton, and Grant Counties in south-central Washington. The line would extend from the existing Bonneville Power Administration substation in Vantage, Grant County to Pacific Power's Pomona Heights substation in Selah, Yakima County. Other landowners in the project area include federal (Joint Base Lewis-McChord Yakima Training Center and Bureau of Reclamation), State and Counties (Yakima, Grant, Kittitas and Benton). The project will also require BPA authorization to interconnect to the Federal Columbia River Transmission System at its Vantage substation. Project activities would include access road construction and improvements, ROW vegetation clearance and earth moving during site preparation for structures and other facilities, and upgrades to Pomona Heights and Vantage substations. There would also be hillside cuts or fills where construction activities would occur in steeply sloped terrain and blasting in rocky areas.

We note with appreciation that the DEIS addresses many of the issues we raised during the project scoping period in February 2010, including analysis of cumulative and climate change effects. Overall, most impacts by the project would be due to construction activities, which would generate both temporary and permanent impacts related to the project footprint and long-term operations and maintenance. In particular, the EPA is concerned about the project's potential impacts to water quality, land use and farmlands, and other resources as discussed below.

#### Water Quality Impacts

The DEIS indicates that water quality may be adversely affected by project construction which is likely to carry sediment and pollutants to nearby waterbodies (p. 4-213). We note that plans include implementation of erosion and sediment controls. However, the project will cross many drainages and

the combination of riparian vegetation and other vegetation removal, earth moving activities and associated erosion and sediment loading could exacerbate water quality conditions in streams already on Washington State's list of impaired water bodies due to exceedances of water quality standards for temperature and other pollutants. For example, the Columbia River at Priest Rapids Lake and the Lower Crab Creek have been listed as water quality impaired due to temperature and pesticides. Therefore, we recommend that extra measures be taken to avoid adverse impacts in these areas. Also, please note that antidegradation provisions of the Clean Water Act apply to those waterbodies where water quality standards are currently being met.

B Because of the project's potential water quality impacts, we recommend that BLM continue to coordinate with Washington State Department of Ecology and affected Tribes to assure that the state and tribal water quality standards will be met during implementation of the proposed project. The final EIS should also include information on how BLM will be working collaboratively with Ecology to ensure compliance with Water Quality Restoration Plans, if any, that will function as BLM's share of Total Maximum Daily Loads implementation, designed to meet State and Federal water quality rules and regulations in Lower Crab Creek and the Columbia River at Priest Rapids Lake.

C Since the project anticipates obtaining a National Pollutant Discharge Elimination System permit for planned construction activities expected to disturb nearly 330 acres (80 acres permanently and 250 acres temporarily), the final EIS should include updated information on the permit application process and measures to protect water quality.

### **Land Use and Farmland Impacts**

The DEIS indicates that the proposed project would impact lands that have been designated as prime farmland and lands managed under the Conservation Reserve Program (Table 4.4-3 and 4, p. 4-97 and 98). Even though some areas would be disturbed temporarily and be restored afterwards, other areas would be impacted permanently. For example, under route segment 3c, short term impacts would occur on about 94 acres (p. 4-95), while high and moderate impacts would affect up to 16 miles of land under the same route segment i.e., 3c (p. 4-96).

D The Farmland Protection Policy Act<sup>1</sup> includes prime farmland, unique farmland, and land of statewide or local importance. Farmlands that are contiguous to sensitive areas, such as floodplains, wetlands, and aquifer recharge zones play important roles in buffering these areas from development and should be protected. Thus, the FPPA seeks to assure that federal actions are designed in a manner compatible with state and local policies and programs to protect farmlands. Because of potential impacts to farmlands and subsequent loss of crops and wildlife habitat, we recommend BLM coordinate with the Natural Resources Conservation Service and/or USDA Service Center and the Farm Service Agency in assessing the project impacts to farmlands, including loss of CRP lands and determining measures to be followed to avoid and minimize any significant impacts to farmlands. The final EIS should include information about NRCS analysis and rating of the potential impacts, and what will be done to restore farmlands and compensate landowners for losses incurred due to the project.

### **Vegetation and Wildlife**

Section 4.2.3 discusses impacts to vegetation resources and indicates that the proposed project would directly affect vegetation communities through trampling and removal due to construction of the

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<sup>1</sup> <http://www.nrcs.usda.gov/programs/fppa/>

E transmission line, access roads and work spaces. Some impacts would be temporary, while others would be permanent. Since thermal modification is the primary cause of streams not supporting beneficial uses in the project area, we are concerned that vegetation removal along waterways would result in streambank scouring, erosion, poor drainage and loss of soil and wildlife habitat. Therefore, we recommend that such areas be targeted for active restoration to increase vegetation cover and improve thermal conditions in stream channels.

### **Cultural Resources**

The draft EIS indicates that there are several cultural resources in the project area, which would be affected by the proposed project activities, including, but not limited to archaeological and architectural resources, as well as burials, rock features (cairns, alignments), talus pits, rock art (pictographs and petroglyphs), and rockshelters (p. ES-iv). The EIS also reports that surveys are still ongoing and that impacts to traditional cultural properties will not be known until affected Tribes have completed their assessments within the project's area of potential effects (p. 5-8).

Section 106 of the the National Historic Preservation Act requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer. In addition, Section 106 requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800. Executive Order 13007, *Indian Sacred Sites* (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity of such sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site.

F Because of anticipated cultural resources impacts by the project, the EIS should address Executive Order 13007, distinguishing it from Section 106 of the NHPA, and discuss how BLM would avoid adversely affecting the resources. The EIS should provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites, and development of a Cultural Resource Management Plan.

### **Transmission Line Monitoring**

G The proposed project has the potential to impact resources within the proposed corridor for a long time. Therefore, we recommend that the final EIS describe a monitoring program designed to assess both impacts from the project and the effectiveness of the proposed mitigation measures for the impacts. The document should also indicate how the program would use an effective feedback mechanism to assure environmental objectives would be met throughout the project lifespan.

Based on the concerns discussed above, we are assigning a rating of EC-2 (Environmental Concerns – Insufficient information) to this DEIS. A copy of the rating system used in conducting our review is enclosed for your reference.

We appreciate the opportunity to review this DEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Christine B. Reichgott".

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure  
EPA Rating System for Draft EISs

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

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February 26, 2013 at 9:10 AM

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## Fwd: Office of Congressman Reichert

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WN\_Mail, BLM\_OR <blm\_or\_wn\_mail@blm.gov>

Tue, Feb 26, 2013 at 9:10 AM

To: William Schurger <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

—— Forwarded message ——

From: **Guill, Zack** <[Zack.Guill@mail.house.gov](mailto:Zack.Guill@mail.house.gov)>

Date: Mon, Feb 25, 2013 at 2:48 PM

Subject: Office of Congressman Reichert

To: "blm\_or\_wn\_mail@blm.gov" <[blm\\_or\\_wn\\_mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)>

Mr. Christensen,

Thank you for passing on the information about Pacific Power preparing to construct a power transmission line from Grant County to Selah Washington. I have read over you provided letter with great interest and discussed your case with my colleagues. At this point it seems that this situation is a negotiation between two parties and is outside of this office's jurisdiction. It would be inappropriate to interject this office in the process. If the situation changes perhaps there may be an opportunity for us to be more involved. I suggest you reach out to your state and local representatives to see if they are able to provide any further assistance.

Thank you for contacting us with this matter and I hope you are able to find the resolution you are looking for.

Sincerely,

**Zachary Guill**

Senior Outreach Manager/ Grants Manager

Office of Congressman Dave Reichert

22605 SE 56th Street, Suite 130

Issaquah, WA 98029

P: 425-677-7414 F: 425-270-3589

Auburn P: 206-498-8103



[reichert.house.gov](http://reichert.house.gov)

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121



**Grant County**  
Office of The  
**Board of County Commissioners**  
P O Box 37  
Ephrata WA 98823  
(509) 754-2011

February 25, 2013

**RECEIVED**  
FEB 27 2013  
Bureau of Land Management  
WFO, Wenatchee, WA

US Dept. of the Interior  
Bureau of Land Management  
ATTN: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, WA 98801

RE: Vantage to Pomona Draft EIS Comments

To Whom It May Concern:

Please accept the following comments on the Vantage to Pomona Draft Environmental Impact Statement (DEIS):

**Coordination**

A The Department of the Interior is required to *coordinate* with the Grant County Board of County Commissioners on this matter pursuant to its obligation under the Federal Land Management Policy Act (FLPMA), and when making any decision under the National Environmental Policy Act (NEPA). This Board has requested coordination meetings with the Bureau of Land Management (BLM) on this matter to help ensure that our concerns were addressed early and in a meaningful manner. To date, the required coordination with this Board has not occurred. The BLM's requirement to coordinate with this Board is of paramount importance because only through this coordination can you ensure that both your planning process and your decision are consistent with locally adopted plans and policies.

**Chapter 1 – Purpose and Need**

B Section 1.3 lists the Lead and Cooperating Agencies associated with this project. Section 1.3.2.5 specifically lists Grant County as a “formal Cooperating Agency”. This is factually inaccurate; Grant County is not a Cooperating Agency for this project. Any reference to Grant County as a “cooperating agency” must be eliminated from the FEIS.

Richard Stevens  
District 1

Carolann Swartz  
District 2

Cindy Carter  
District 3

“To meet current and future needs, serving together with public and private entities, while fostering a respectful and successful work environment.”

## **Chapter 2 – Proposed Action and Alternatives**

Section 2.6.4.2 identifies a route east of Mattawa that was eliminated for consideration early on. The DEIS specifically states:

*“Portions of alternative routes located just east of Mattawa were eliminated from further consideration due to potential impacts to existing agricultural uses and operation. The potential impacts considered included loss of farmable land, orchards and vineyards, impacts to farming operations, including the relocation of wheel line irrigation systems and center pivot irrigation systems and safety hazards to aerial spraying operations and the use of helicopters to dry cherry orchards in the spring.”*

C All of these issues are present along the BLM’s preferred route segment 3c. It is the only logical conclusion that, because the reasons listed above were enough to exclude an earlier route east of Mattawa, that route segment 3c should be removed from any further consideration given the potential impacts to agricultural uses and operations.

D Section 2.7 provides for a comparison of alternatives and summary of impacts. It is unclear how route segment 3c can generally result in greater impacts than 3b and yet somehow segment 3c is the BLM’s preferred alternative. Are the environmental impact categories somehow weighted such that there are more and less important categories under NEPA? Is it the BLM’s assertion that cultural resource impacts outweigh *any and all* other impacts?

E At the preferred route selection meeting that occurred on or about May 17, 2012, the BLM and project proponents were inclined not to have a discussion (as they had for the previous route alternatives) regarding 3b and 3c because they understood 3b was “off the table” for consideration. Our staff member in attendance requested that these route alternatives be discussed just as the other route alternatives had previously been. The subsequent discussion was superficial at best, and concluded with the BLM not willing to voice their ‘preferred’ alternative of the two routes in that forum. It is clear from that discussion that 3b was never intended to be a viable route alternative for this project. Given that 3b was never a viable route to begin with, how can the BLM review the impacts of 3c against an impossible alternative and expect to reasonably decide which route results in the least environmental impact?

## **Chapter 3 – Affected Environment**

F Section 3.4.4.3 provides an overview of Zone 3. In the Route 3c discussion, the DEIS states that this route parallels Road N SW from State Route 243 to the foothills of the Saddle Mountains. Please be advised that there is little to no existing right-of-way for Road N SW throughout this entire route alternative. The DEIS regularly implies and sometimes states that the 3c route is merely paralleling an existing, impacted ROW, which appears to be some of the justification for this route being a part of the preferred alternative route. This supposition is incorrect given the lack of developed ROW along this route. In fact the location of the project along this route will have significant impacts to existing and ongoing agricultural uses.

## **Chapter 4 – Environmental Consequences**

G Grant County is the home of the Columbia Basin Project (CBP), the largest reclamation project in the United States. The CBP provides water to nearly 650,000 acres of some of the most productive agricultural lands in the Country. The agricultural production that results from the CBP is estimated to be approximately \$1.44 billion annually. Impacts to these agricultural lands have direct impacts on the economy of this community, and those socioeconomic impacts are no less important than any other environmental impact that will result from the proposed project. The DEIS fails to adequately quantify the actual impacts to the agricultural uses in Grant County.

H Section 4.4.4.10 states that long term impacts will occur to agricultural lands including impacts to alfalfa, blueberry, cherry, field corn, wine grape, grass hay, green pea, potato, timothy, and wheat. It is also true that the daily operations associated with these types of crops would also be impacted by the siting of this facility along route segment 3c. These activities include but are not limited to harvesting, aerial spraying, the use of helicopters in drying orchards in the springtime, and other ancillary operational activities. As we have previously indicated, these impacts were the reason for exclusion of earlier route alternatives that were also east of Mattawa. Because these impacts are identical to the impacts to the earlier route alternatives, segment 3c should be removed from consideration.

## **Chapter 5 – Consultation and Coordination**

I As we have previously stated, the BLM is required to coordinate with Grant County under their obligations set forth in FLPMA. This coordination requirement is not simply a “one and done” obligation of the BLM. Rather, the BLM is required to continually coordinate with this Board (a local unit of government) throughout the process of DEIS development, and regardless of ‘public comment periods’, our involvement is in parity to that of the BLM, not as a subordinate.

J That effort should also have included coordination when selecting the Preferred Route Alternative on May 17, 2012. At that meeting, the BLM chose not to voice any opinion on a few of the route alternatives, including the discussion relative to segments 3b and 3c. Instead, following the meeting and during the finalization of the DEIS, the BLM, at its sole discretion, decided that route 3c was the preferred alternative for the project. This was not a decision the BLM was entitled to make without coordinating with this Board.

## **Conclusion**

K The Grant County Board of County Commissioners appreciates that the project proponents need to supply a redundant source of power to the Yakima area, and we support the development of infrastructure when it is done responsibly and the documentation behind the project accurately characterizes the potential impacts and provides appropriate mitigation for those impacts that are unavoidable. However, in this case, the impacts to Grant County are avoidable, alternative routes exist that would eliminate any impact to the agricultural operations present on the Wahluke slope.

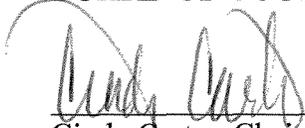
It is critical to realize that the rural areas which this piece of infrastructure will pass through are working landscapes that generates much of the County's life-blood in terms of our economy.

L Expecting agricultural practices and infrastructure to be modified to accommodate this one  
M facility, a facility that provides no power services to this County is unreasonable. Further the  
DEIS clearly states the impacts to this portion of Grant County are generally considered high to moderate, and this Board finds that to be too great of an impact to support the route identified solely by the BLM as the "preferred alternative".

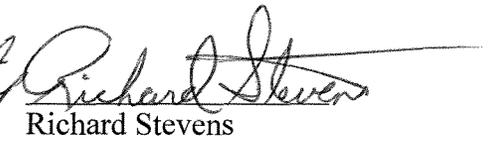
By submittal of these comments, Grant County trusts it is considered a party of record and will be made aware of future document releases, comment periods, and appeal opportunities relative to this matter.

Sincerely,

**BOARD OF COUNTY COMMISSIONERS**

  
Cindy Carter, Chair

  
Carolann Swartz

  
Richard Stevens

:bjv

CC: Senator Janea Holmquist Newbry  
Representative Judy Warnick  
Representative Matt Manweller  
Senator Linda Evans Parlette  
Representative Cary Condotta  
Representative Brad Hawkins  
Senator Jim Honeyford  
Representative Bruce Chandler  
Representative David Taylor  
Damien Hooper, Grant County Planning Manager



Schurger, William <wschur@blm.gov>

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## Fwd: Comments for Vantage to Pomona Heights EIS

Message

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**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Thu, Mar 7, 2013 at 12:07 PM

To: Sandra Gourdin <sgourdin@blm.gov>, William Schurger <wschur@blm.gov>

----- Forwarded message -----

From: **FROMHERZ, MATT (DNR)** <[matt.fromherz@dnr.wa.gov](mailto:matt.fromherz@dnr.wa.gov)>

Date: Thu, Mar 7, 2013 at 12:02 PM

Subject: Comments for Vantage to Pomona Heights EIS

To: [BLM\\_OR\\_WN\\_Mail@blm.gov](mailto:BLM_OR_WN_Mail@blm.gov)

Cc: "Knust, Rochelle (DNR)" <[Rochelle.Knust@dnr.wa.gov](mailto:Rochelle.Knust@dnr.wa.gov)>, "BALLEW, JANET (DNR)"

<[JANET.BALLEW@dnr.wa.gov](mailto:JANET.BALLEW@dnr.wa.gov)>, "GRASSEL, MARK (DNR)" <[MARK.GRASSEL@dnr.wa.gov](mailto:MARK.GRASSEL@dnr.wa.gov)>

Please find comments on this EIS attached.

<<4750\_001.pdf>>

Thank you.

**Matthew Fromherz**

Southeast Region Right of Way Engineer

Washington State Department of Natural Resources (DNR)

713 Bowers Road

Ellensburg, WA 98926

(509)925-0965

[matt.fromherz@dnr.wa.gov](mailto:matt.fromherz@dnr.wa.gov)

[www.dnr.wa.gov](http://www.dnr.wa.gov)

—  
BLM Wenatchee Field Office

915 Walla Walla Ave.

Wenatchee, Washington 98801

Phone: 509-665-2100

Fax: 509-665-2121

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 **4750\_001.pdf**  
99K



March 7, 2013

BLM Wenatchee Field Office  
Attn: Vantage to Pomona Heights EIS Project Manager  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521

Subject: Pacific Power's Vantage to Pomona Heights 230kV Transmission Line Draft EIS

Dear Project Manager:

Please accept these as comments on the Vantage to Pomona Heights Draft EIS prepared by the Washington State Department of Natural Resources (DNR). DNR previously submitted comments dated March 8, 2010 during the scoping period of this proposal. Those comments remain relevant to this proposal. However, we are submitting these comments more specifically concerning the identified preferred route alternative.

A There appear to be several State parcels potentially impacted by the proposed preferred route but DNR is particularly concerned with this alignment as it may cross Section 28, Township 15 North, Range 24 East, W.M., Grant County, Washington. Unfortunately, the maps identifying ownership jurisdictions in your Draft EIS do not recognize State ownership of this parcel, so we did not recognize the potential impact until notified by our lessee, Tedd Wildman of Saddle Mountain Vineyards, who received a letter from Pacific Power concerning the potential impact.

The area of potential impact appears to be along the easterly edge of our Section 28 ownership. State holds and manages this parcel to provide income to the Common School Trust. DNR, as trust manager, is mandated by common trust law, the State Constitution and the Enabling Act to manage federally granted trust lands such as this for the full and exclusive benefit of the designated trust. This area is presently managed in vineyard production by our lessee. This productive use provides a constant stream of quality income for the designated trust, as well as providing quality income to our lessee and the local economy in an economically depressed area.

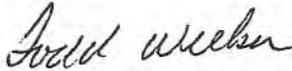
B Transmission lines with their safety and reliability concerns and their associated maintenance and vegetation control activities create significant challenges and concerns when they come in proximity with orchard and vineyard management. Such conflicts are best avoided where reasonably possible. Some conflicts are unavoidable and mitigation measures must be considered, however, where it is physically reasonable to avoid these conflicts, measures should be taken to do so.

DNR believes the conflicts can be avoided here. Immediately to the east of our vineyard development lies a parcel of undeveloped federal land. Shifting the transmission line alignment to the east a sufficient distance to avoid conflicts with the existing orchard and vineyard development will prevent impacts to our leased agricultural activities, allowing the present level

of production on this land to continue, thereby maintaining the stream of beneficial income for the Common School Trust, our lessee and the local community.

We have scheduled a meeting on site for Tuesday March 12<sup>th</sup> between DNR, our lessee and Pacific Power's Project Manager, John Aniello. We may submit additional comments after this meeting on site.

Sincerely,



Todd Welker  
Region Manager

C: DNR SEPA Center  
Matt Fromherz, Region R/W Engineer  
Mark Grassel, Orchard and Vineyard Manager

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Schurget, William <wschurge@blm.gov>

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## Fwd: Comments on Pacific Power Project for Selah-Vantage Transmission Line

MESSAGE

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**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Thu, Mar 7, 2013 at 12:08 PM

To: William Schurget <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

----- Forwarded message -----

From: **Karin Neely** <kneely@scbid.org>

Date: Thu, Mar 7, 2013 at 11:43 AM

Subject: Comments on Pacific Power Project for Selah-Vantage Transmission Line

To: [BLM\\_OR\\_WN\\_Mail@blm.gov](mailto:BLM_OR_WN_Mail@blm.gov)

Cc: David Solem <dsolem@scbid.org>

Please see the attached comments. If you have any questions, please contact our Manager, David Solem.

Karin G. Neely  
Executive Assistant  
South Columbia Basin Irrigation District  
P.O. Box 1006  
Pasco, WA 99301-1006  
Tel: (509) 547-1735  
Fax: (509) 547-8669  
Email: [kneely@scbid.org](mailto:kneely@scbid.org)

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
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Fax: 509-665-2121



**Comments on Selah-Vantage Transmission Line.docx**

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## COMMENTS ON PACIFIC POWER PROJECT FOR SELAH-VANTAGE TRANSMISSION LINE

On behalf of the water users in the South Columbia Basin Irrigation District (SCBID), I offer the following comments on the Vantage to Pomona Heights 230 kv transmission line project.

A The primary concerns center on the analysis of the Route Segment 3-C of the Preferred Alternative (3-C). This segment crosses private land and federal easements in the Columbia Basin Project. This comes as a surprise to SCBID, as I have not been consulted in the development of the proposed route. The Bureau of Reclamation has not consulted with SCBID on 3-C and, until recently, had not considered 3-C impacts.

I have driven the 3-C route of the proposed powerline on the west side of Road N. Following are issues of concern:

1. The powerline would cross—at least eight times—Reclamation rights-of-way containing canals, laterals, and wasteways that must be operated and maintained with equipment that may include long-reach excavators and concrete pumping equipment.  
B
2. There are seven irrigation ponds that may require cleaning with long-reach excavators, draglines, or other high-reach equipment.  
C
3. There are four orchards that are or may be grown on trellis systems.  
D
4. There are nine pivot irrigated fields where the pivot swings most likely will be affected by the powerline placement.  
E
5. There are pumping plants and electrical lines (both above and below ground) located in this area that would affect tower placement.  
F
6. There are irrigation pipelines all associated with the irrigation system that will affect tower placement.  
G
7. There is partitioned land for residential or industrial development located in the route which may be valued much higher for impacts.  
H
8. There are two houses that would be affected.  
I
9. There is other development, present and future, which would be affected.  
J

K The report underestimates both the short- and long-term impact to the landowners because the entirety of the farming and irrigation activity along this route was not well understood. It is difficult to analyze specific impacts without having the exact

construction specifications and layout. The acreage impacts stated on page 4-96 cannot be accurate. Table 4.A-5 does not match up with the text.

L The visual impacts (Appendix C) to landowners who must live, work, and operate directly under the powerlines were underestimated or not considered for 3-C parallel to Road N. It is extremely high impact.

M The report does not adequately address changes to cropping patterns that will occur in  
N the future. The report does not address the disruption to aerial spraying that may occur  
O with the powerline and the cumulative impacts that an additional powerline in the area has on farming operations.

In conclusion, farmers along 3-C believe the value of their land and farm will be negatively impacted by the powerline. I do not believe any of the landowners would be willing sellers, and the process to acquire 3-C will be very long and expensive. Because the EIS does not address all of the impacts, the cost of 3-C is underestimated.

P Because of the high impacts to farming, SCBID does not approve of the 3-C route and recommends a different route be chosen.

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William Schurger <wschurge@blm.gov>

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## Fwd: Vantage to Pomona Heights EIS

message

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WN\_Mail, BLM\_OR <blm\_or\_wn\_mail@blm.gov>

Mon, Mar 11, 2013 at 11:49 AM

To: William Schurger <wschurge@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

----- Forwarded message -----

From: **GAMON, JOHN (DNR)** <[JOHN.GAMON@dnr.wa.gov](mailto:JOHN.GAMON@dnr.wa.gov)>

Date: Fri, Mar 8, 2013 at 3:52 PM

Subject: Vantage to Pomona Heights EIS

To: [OR\\_Wenatchee\\_Mail@blm.gov](mailto:OR_Wenatchee_Mail@blm.gov)

Please find attached our comments on the DEIS for the Vantage to Pomona Heights project. Thanks for extending the deadline for comments. As indicated in the attached letter, if you have questions about our comments, please feel free to contact me.

John Gamon, Manager

Natural Heritage Program

Washington State Department of Natural Resources

1111 Washington Street SE

Olympia, Washington 98504-7014

(360) 902-1661

[john.gamon@dnr.wa.gov](mailto:john.gamon@dnr.wa.gov)

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Wenatchee, Washington 98801  
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 **WNHP\_Vantage\_Pomona.PDF**  
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BLM Wenatchee Field Office  
Attn: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521

To Whom It May Concern:

Thank you for the opportunity to provide comments on the DEIS for the Vantage to Pomona Heights 230k V Transmission Line Project. I have reviewed the document for its treatment of species and ecosystems of concern to the Washington Natural Heritage Program. I commend the efforts of those who compiled the DEIS for the manner in which they made appropriate use of information managed by the Natural Heritage Program and for the stated commitment to protecting species and ecosystems of conservation concern.

Below are a few specific comments that I hope will contribute to a successful conservation outcome of this project:

A There are two species occurrences included in Table 3.2-5 that are not in the Washington Natural Heritage Program database: hedgehog cactus (*Pediocactus simpsonii* var. *robustior*) in segment 1b and Nuttall's sandwort (*Minuartia nuttallii* ssp. *fragilis*), also in segment 1b. We would like to receive information on each of these occurrences so that we can add them to our database, given that we have the responsibility for maintaining a statewide database of such information.

The project design features identified in Chapter 2 (2.5.2 Biological Resources) will definitely help limit potential negative impacts to species and ecosystems of concern.

- B 1. Under BIO-4 (page 2-46), we would like to be consulted in the event that a determination is made that any special status plants require relocation. Our expertise may be useful in such a determination. We also want to keep our database as current as possible, and to the extent that a population might be impacted, we want the database to reflect the status and condition of each population.
- C 2. Under BIO-8 (page 2-47), we would like to receive information about any newly discovered populations of special-status plant species, again, given that we have the responsibility to maintain a statewide database of such information.

Finally, the project area overlaps with an area that we, the Washington Natural Heritage Program, have identified as having high conservation value because of the presence of striped whipsnakes (*Masticophis taeniatus*) and their extreme rarity in Washington. Route 3b crosses the basalt feature where the snakes are known to occur (east side of the river and in the vicinity of the Vantage Substation). Both routes 3b and 3c go through historically known sites. We are currently developing a proposal for conservation in the area and are in the preliminary stages of identifying specific conservation actions. We would like the opportunity to be consulted regarding how best to avoid or minimize impacts to the snakes during the implementation of this

D

project. We also recommend that the appropriate project design features identified in Chapter 2 (2.5.2 Biological Resources) be applied to the striped whipsnake locations and its habitat.

If you have questions about the above comments, please feel free to contact me. I'd be glad to discuss them with you.

Sincerely,



John Gamon, Manager  
Washington Natural Heritage Program  
Washington State Department of Natural Resources  
PO Box 47014  
Olympia, Washington 98504-7014  
(360) 902-1661  
[john.gamon@dnr.wa.gov](mailto:john.gamon@dnr.wa.gov)

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## Fwd: Vantage-Pomona Heights EIS Comments

1 message

**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Fri, Mar 8, 2013 at 3:45 PM

To: Sandra Gourdin <sgourdin@blm.gov>, William Schurget <wschurge@blm.gov>

----- Forwarded message -----

From: **Edrie Risdon** <Erisdon@gcpud.org>

Date: Fri, Mar 8, 2013 at 2:59 PM

Subject: Vantage-Pomona Heights EIS Comments

To: "BLM\_OR\_WN\_Mail@blm.gov" <BLM\_OR\_WN\_Mail@blm.gov>

Please find attached Grant PUD's comments on the Vantage-Pomona Heights 230 kV Transmission Line project.

Thank you for the opportunity to comment.

Edrie Risdon

Lands Specialist

Grant County PUD

Ephrata, WA

509.754.5088 ext. 2362 (desk)

509.393.1693 (cell)



—  
BLM Wenatchee Field Office  
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Wenatchee, Washington 98801  
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Fax: 509-665-2121

 **Final draft Vantage\_Pomona230kV.docx**  
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March 14, 2013

Bureau of Land Management  
915 Walla Walla Ave  
Wenatchee, WA 98801

**RE: Grant County PUD Comments on the DEIS Vantage-Pomona Heights 230 kV Transmission Line**

- A Grant PUD supports the Agency Preferred Route Segment 3C and Alternative D through Grant County. This route minimizes property use, recreation impacts, and coordination issues within the boundary of the Priest Rapids Hydroelectric Project P-2114. Route Segment 3C crosses several Grant PUD 230 kV transmission lines on the southern portion near Midway, and is near the Burkett Lake Recreation Area (a Grant PUD owned recreation site). We note that the Agency Preferred Alternative has the least potential to impact existing Grant PUD transmission and recreation facilities.
- B We also note that if transmission structures are to be placed within the Project boundary, additional review and/or approval by the Federal Energy Regulatory Commission (FERC) may be required. Therefore Grant PUD requests detailed coordination with the Bureau of Land Management (BLM) on the engineering of these crossings and structures to avoid transmission conflicts, provide for optimum operation and maintenance of all lines, and allow time for proper reviews and approvals.

**RECREATION:**

- Route Segment 3C Burkett Lake Area: This route segment avoids crossing the planned expansion area of the Burkett Lake Recreation Area, but the proximity of the transmission line may impact the experience of some recreation users. The line route may impact the parking area and vault toilet proposed on the Bureau of Reclamation (BOR) property. Grant PUD requests that BLM allow opportunities to review and coordinate the placement of structures and spans during engineering design.
- C
- D Route Segment 3C: Visual impacts may occur at many recreation sites owned and managed by Grant PUD. Grant PUD agrees with the statement within the DEIS that immediate foreground and foreground views of strong contrasts would also occur from recreationists using the Columbia River corridor.

**LAND USE:**

- Route Segment 3B follows an abandoned railroad Right Of Way (ROW). A majority of the ROW is located within the Project boundary of the Priest Rapids Hydroelectric Project. Grant PUD has a reservation for erosion and flowage easement on portions of the railroad ROW located within the Project boundary. If this
- E

*Public Utility District No. 2 of Grant County, Washington*

P. O. Box 878 • Ephrata, Washington 98823 • 509.754.0500 • [www.gcpud.org](http://www.gcpud.org)

Alternative were chosen, permission from Grant PUD and review/approval by FERC would be required to occupy the ROW.

F Route Segment 3B could impact the Wanapum Indian Village located southwest of the dam in Sections 2 & 3, Township 13, Range 23, E.W.M., Yakima County. There are approximately 30 homes in this area. Maintenance activities in the vicinity on the Wanapum Indian Village may require advance notification to residents. Grant PUD will request that BLM coordinate with Grant PUD on engineering design if this Alternative is chosen.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Kelly Larimer  
Lands and Recreation Resources Manager  
Grant County PUD

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Schurger, William <wschurge@blm.gov>

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## Fwd: Vantage to Pomona Heights DEIS comments from WDFW

\* message

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**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Fri, Mar 8, 2013 at 12:54 PM

To: Sandra Gourdin <sgourdin@blm.gov>, William Schurger <wschurge@blm.gov>

----- Forwarded message -----

From: **Teske, Mark S (DFW)** <Mark.Teske@dfw.wa.gov>

Date: Fri, Mar 8, 2013 at 12:46 PM

Subject: Vantage to Pomona Heights DEIS comments from WDFW

To: "Linda Coates-Markle (BLM\_OR\_WN\_Mail@blm.gov)" <BLM\_OR\_WN\_Mail@blm.gov>

Thanks.

Mark Teske, WDFW

509) 962-3421

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BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121

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 **VantagetoPomonaDEIS phComments.pdf**  
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State of Washington

**Department of Fish and Wildlife**

*South Central Region – Ellensburg District Office, 201 North Pearl, Ellensburg, WA 98926*

*Phone: (509) 962-3421, Fax (509) 925-4702*

March 8, 2013

Linda Coates-Markle  
BLM Wenatchee Field Office,  
ATTN: Vantage to Pomona Heights EIS,  
915 Walla Walla Avenue,  
Wenatchee, Washington 98801-1521.

**Subject:** Vantage to Pomona Heights 230 kV Transmission Line DEIS

Dear Ms. Coates-Markle:

The Washington State Department Fish and Wildlife (WDFW) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Vantage to Pomona Heights 230 kV Transmission Line. We appreciate the opportunity to provide feedback to the Bureau of Land Management (BLM) regarding this proposal. We look forward to working with you and others to seek mutually suitable alternatives that address the critical issues that influence shrub-steppe habitat and the species that depend on this habitat.

**Forthcoming Listing Decision**

The United States Fish and Wildlife Service (USFWS) will make a decision in 2015 about the listing status of the Greater sage-grouse. Currently, listing of the bird is warranted but precluded by higher listing priorities. This means that the sage grouse warrants listing but budgetary constraints and/or species even more imperiled take precedent.

The Western Governors Association (WGA) in recognition of this situation has been collaborating on methods to design and locate power transmission corridors that are sensitive to issues that could affect the interests of multiple states. A federal listing of the sage grouse could affect all the western states in the range of the sage-grouse. States are actively seeking and implementing measures to avoid listing. Projects such as the Vantage to Pomona Heights Transmission Line pose a high risk of impacting existing suitable sage-grouse habitat. It would render habitat unusable for crucial life histories of the sage-grouse. It would impair ecological connectivity between remaining blocks of shrub-steppe habitat identified in state recovery plans and landscape studies, and it is in conflict with efforts to avoid the likelihood of an ESA listing.

### Impacts of Transmission Lines

Overhead structures such as transmission lines pose a significant threat to the persistence of sage-grouse populations. Raptors and birds such as ravens and crows will prey on eggs, juvenile and adult sage-grouse. These avian predators can more efficiently hunt an area from these artificial perches without the need to continually fly to locate prey. This is an advantage for these avian predators when compared to an unaltered landscape lacking these introduced perches. The perching/nesting habitat for predators that these elevated structures provide is recognized as a mortality source that also impacts use of adjacent habitat. Sage-grouse inhabit landscapes mostly devoid of trees. Whether it is the presence/ behavior of predatory birds, the perch structures, or some combination of the two, overhead structures are a significant concern for grouse conservation and recovery. Habitat loss is also a significant concern. It compounds the lost habitat utilization and mortality that is associated with placement of these structures.

### The Conservation Objectives Team Report

The USFWS Greater sage-grouse Conservation Objectives Team (COT) report is available. The COT was tasked with the, *“development of range-wide conservation objectives for the sage-grouse to define the degree to which threats need to be reduced or ameliorated to conserve sage-grouse so that it is no longer in danger of extinction or likely to become in danger of extinction in the foreseeable future.”* (1). The COT identified priority areas for conservation (PACs). The COT on pages 51 and 52 contains infrastructure recommendations within PACs. The Vantage to Pomona line is within a PAC. The Vantage to Pomona Heights project as proposed is in conflict with COT guidance.

### Wildlife Impacts

The transmission line routes are located in areas that support numerous wildlife species. Some of the species are shrub-steppe obligates that are rare and are in decline. The area also contains priority species for Washington State Department of Fish and Wildlife (WDFW). The capacity of the landscape to support non-obligate or generalist species will be reduced by this proposal.

We are very concerned with potential impacts to the Striped Whipsnake. The proposed transmission line project bisects the only remaining Striped Whipsnake occurrences known in Washington and also bisects habitat that was historically occupied by the Striped Whipsnake. In addition to the footprint impacts of the poles/towers and roads, the perching habitat that is introduced will make these snakes vulnerable to predation and impact their lizard prey base. Weed infestations that change the character of the habitat impairs the hunting ability of the snake. Traffic on service roads associated with the transmission line are a mortality source for the snake. Rocky areas often selected for tower placement are key areas for Striped Whipsnakes. Habitat for species such as white and black-tailed jackrabbit is functionally reduced and impaired by the presence of transmission lines. Their habitat is reduced and fragmented by transmission lines.

### Reasonable Range of Alternatives

F The applicant has apparently dismissed any alternative associated with burying the transmission line within regularly occupied (Tier 1) sage-grouse habitat and critical corridors protecting ecological connectivity of shrub-steppe obligate species. Cost is cited and the applicant is apparently unreceptive to exploration of this alternative. Burying the transmission line or critical segments of the line in discreet and strategic locations was not analyzed in any of the alternatives even though it has the advantage of avoiding or mitigating identified impacts to sage-grouse and other fish and wildlife species. Additionally, all alternative transmission lines routes share nearly an identical alignment on the western segments of the proposed transmission line. If each alternative contains nearly identical alignments for a significant portion of the proposed route, a reasonable range of alternatives has not been presented. The proposed routes will further fragment shrub-steppe habitat that that has been identified in a number of plans or studies that specifically looked at conservation of shrub-steppe species. The Washington Wildlife Habitat Connectivity Working Group performed a Statewide analysis as well as a Columbia Plateau analysis. Sage-grouse conservation was the impetus for or was a significant element in each of these studies. The proposed alternatives in the Vantage to Pomona Heights Transmission Line do not avoid or mitigate adverse impacts to sage-grouse identified in these studies. The findings of the USFWS Greater sage-grouse COT report are not reflected in the alternatives. In

G consideration of the fact that the local sage-grouse population is in danger of disappearing, it is reasonable to expect that the transmission line project should be comprised of alternatives that reflect a cautious set of actions that clearly avoid adverse impacts. The Vantage to Pomona Heights Transmission Line DEIS fails to include a reasonable range of alternatives.

On page 3-40, the DEIS reads,

#### 4.2.5 Mitigation Measures

*“The project design features and environmental protection measures described in Section 2.5 (Project Design Features Common to Action Alternatives) have been incorporated into the project design and would be implemented during construction and operation of the proposed Project. These measures are designed to avoid or minimize environmental impacts from Project construction, operation and maintenance activities and are items that Pacific Power has committed to implement as part of the Project development; therefore, **no additional mitigation would be required.**” (Emphasis added)*

H What is being proposed is essentially best management practices (BMPs) to address the impacts resulting from construction, operation and maintenance of this new line. However, no mitigation alternatives are provided for the permanent footprint of the project proposal, the loss of ecological connectivity of shrub-steppe, or the identified impacts to sage-grouse. Thus, we do not concur that the stated BMP's, are adequate. The project as proposed has the potential to render from 16,000 acres up to 32,000 acres of shrub-steppe habitat unusable for crucial life

histories of an imperiled species. See **Zone of Influence** section below for a more detailed explanation.

In Chapter 4 on page 281, The proposed Saddle Mountain Wind Farm is discussed. The distance from the line route is cited as rationale for lack of inclusion in the cumulative analysis of the DEIS. That section reads as follows:

### **Saddle Mountain Wind Farm**

*“Horizon Wind Energy Northwest proposes to develop, construct, own and operate a wind power facility on Saddle Mountain in southwest Adams County. The proposed project would consist of approximately 4,500 acres of privately owned land approximately six miles southwest of Othello, Washington. The project is about a mile from BLM lands in Grant County.*

*The proposed wind energy facility would consist of a string of approximately 32 wind turbines extending approximately seven miles along the ridge-top of the eastern end of the Saddle Mountains. The project would use 3-MW turbines for a total wind farm size of 96 MW. The project is 50 miles east of Vantage-Pomona Heights Transmission Line Project area. Due to its distance from the Project area, it is not considered in the cumulative analysis.*

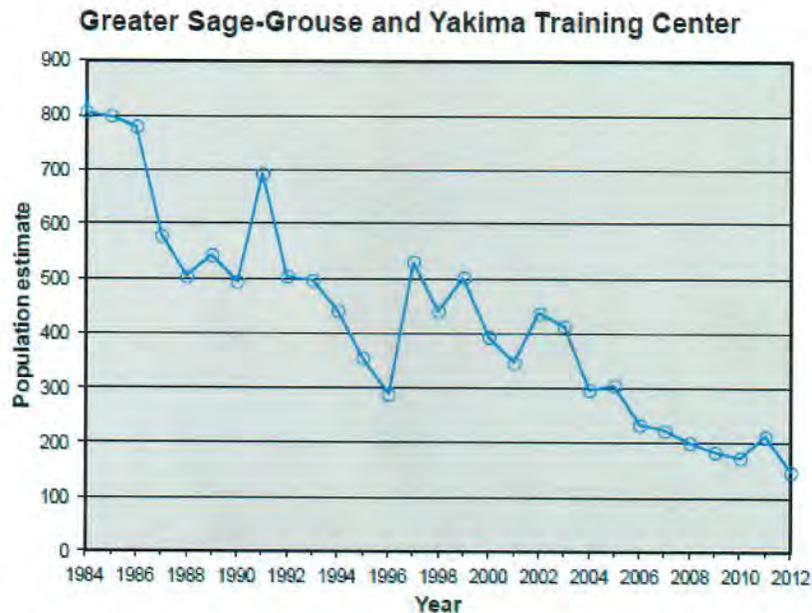
*Other wind development project proposals are unlikely in the foreseeable future because the federal tax credit for wind energy development is set to expire at the end of 2012 and the BPA has stated that they cannot integrate and firm additional wind energy into its system in the foreseeable future. BPA currently has power purchase agreements for over 3,000 MW of wind energy in the region.”*

The information concerning expiration of the tax credit cited in the DEIS is dated information. The tax credit is in place and available to prospective developers. The significant investment that BPA, Pacific Power and others are currently making in the power transmission grid will change capabilities to integrate power. As the grid expands, so will capacity. One of the impediments to wind power is distance to transmission lines. Transmission lines in new locations change the economics of wind power development and make them more feasible. The distance from project of the proposed Saddle Mountain Wind Farm is not a compelling reason to ignore the cumulative impacts of that proposal that this new line makes possible. Thus, that project proposal should be included in the environmental and cumulative effects review as that project would appear to be a connected action, infeasible without this project proposal.

I

### **Route Selection**

Sage grouse lek counts on and around the YTC are at the lowest levels that have ever been recorded (< 150 individuals). Range wide, the plight of the bird is so dire that Federal listing by the USFWS is warranted but precluded.



J The applicant has selected a preferred route and has surveyed that route to ascertain use by sage grouse. Since few grouse were observed on this route, it is proffered that this route would have negligible impacts to the sage grouse. If a healthy, well distributed sage grouse population existed, this logic may be more relevant. However, we are considering adverse impacts to the last known sage grouse population in the southern portion of Washington State. This is where the population has retracted to and is the last place where it exists. This project proposal will degrade the remaining core habitat and reduce opportunities for ecological connectivity to other remaining habitat.

The remaining density of an imperiled population is a poor surrogate for habitat importance. By this standard, the location of a nearly extinct population would indicate an ideal route since few or no individuals would likely be encountered during surveys. The role that this habitat plays in population maintenance and recovery efforts is undervalued. Additionally, if adjacent habitat is burned (which is an entirely reasonable scenario), this habitat along the route may form the core habitat for the remaining birds. This DEIS performed a static analysis in a landscape subject to large scale disturbance events, (primarily fire).

### **Sufficiency of Analysis (Piecemeal Analysis)**

K Pacific Power's existing transmission line across YTC is not meaningfully included in the analysis despite the inextricable connection it has to the new proposed line. The inadequacy of the existing line is, in fact, the justification for the need for an entirely new transmission line. The capabilities of the existing line to handle a rerouted electrical load have been deemed insufficient. The habitat impacts of that existing line have yet to be addressed. The analysis

partitions the new proposal from the old line, but the old line forms the justification for the new line. This piecemeal treatment frustrates analysis and artificially excludes elements integral to development of alternatives and potential mitigation packages.

If this new proposed line is to provide reliability or redundancy in case the existing line experiences a malfunction or is damaged, a new line could be built to a different specification to meet a temporary routing need. Efforts at remedial measures to modify the existing line across the YTC installation have not been sufficiently explored. We are being asked to consider an entirely new line while significant habitat issues associated with the old line remain unaddressed. Either the proponent is unwilling or unable to perform efficacious measures at their existing infrastructure. Significantly increasing their obligations with this new route is cause for concern since they propose to essentially mimic the features of their existing line. The impacts of the proposed Saddle Mountain Wind Farm are also left for an analysis at some later date, artificially separating that analysis from this current proposal. Consideration of the BPA Moxee-Midway Transmission Line is also missing from the DEIS.

L

### **Zone of Influence**

Alternative D is a total of 66.3 miles long and it is the Agency Preferred Alternative. Combined figures for both suitable and marginal sage-grouse habitat along that preferred route come to 42.4 miles. This information is provided in Table 4.3-10 on page 4-83 of the DEIS. Based on current best available science regarding sage-grouse behavior associated with transmission lines and associated towers, it is reasonable to assert that no leks will ever be established beneath or adjacent to the new proposed transmission line along those 42.4 miles.

M

The significant increase in perches and nesting habitat for grouse predators appears to be another impact that isn't avoided, mitigated or addressed. The DEIS utilizes a distance of 0.6 miles from the line route as a survey distance to a lek location. Utilizing just half that 0.6 mile figure as a distance from the line that would negatively impact lek development or persistence, we arrive at 16,281 acres of grouse habitat that will be adversely impacted within .3 miles of the line. If we utilize the full .6 mile metric, we arrive at 32,563 acres of grouse habitat impacted along the route. This is just one life history. The seemingly intact shrub-steppe habitat in the vicinity of the transmission line is functionally degraded for sage-grouse life history requirements by the presence of these poles and towers. Considering the imperiled state of this grouse population, introducing an additional stressor of this magnitude and siting it in the last of the occupied habitat would potentially cause irreparable harm to this population.

N

Table Developed by WDFW Utilizing Information Provided In DEIS

Percent of Tier 1 Sage Grouse Habitat Acreage Impact within .6 miles of Proposed Line Segments						
Route Segments that comprise Agency Preferred Alternative	Segment Length (miles) from DEIS Table 2.1	Tier 1 Acres Present within Project Area from DEIS Table 4.3-7	Acres Potentially Impacted per Route Segment (Length x 1.2 mile width) *	Percent of Potential Impact to Tier 1 habitat within .6 miles of line		
1a	2.2	3,816 acres	1,689.6 acres	44.2 percent		
1b	12.5	17,046 acres	9,600 acres	56.3 percent		
2a	1.0	2,829 acres	768 acres	27.1 percent		
2c	18.1	18,801 acres	13,900 acres	73.9 percent		
2d	7.0	9,984 acres	5,376 acres	53.8 percent		
3a	0.1	0 acres	0 acres	0.0 percent		
3c	25.4	2,495 acres	19,507 acres	100 percent		
<b>TOTALS</b>	66.3 Miles	54,971 acres				

\* Six tenths or (.6) miles on either side of the line route totals 1.2 miles wide.

Tier 1 = Regularly Occupied Habitat, Tier 2 = Connectivity Habitat, Tier 3 = Occasionally Occupied Habitat, Tier 4 Expansion Habitat

### Service Road Calculations

The roads needed to construct and service the line are analyzed in the DEIS. A range of road widths is provided and disturbance area calculations are made based on those width assumptions. Results of the calculations are provided on Table 2-5 on page 2-27 of the DEIS. In the text that precedes the table, the disturbance widths range from 14 feet to 24 feet with a 5 foot disturbance zone on either side of the running surface. The calculations on the table however utilize the narrowest road width to arrive at the disturbance footprint area figure. Additionally, the habitat impacts are viewed as short-term, temporary and long-term. To term some of these impacts as temporary or short-term is problematic in light of the challenges that cheatgrass and other aggressive exotics present with disturbed soils in an arid environment. This proposes an outcome that has been difficult to accomplish. Even if correct techniques are utilized, annual precipitation amounts can result in a failed effort. A thorough treatment of planned re-vegetation methods is needed.

### BPA Moxee-Midway Transmission Line Rebuild

The Bonneville Power Administration (BPA) proposes to rebuild an existing line in close proximity to Pacific Power's Vantage to Pomona Heights proposed line. In their project notice, BPA asserts that their rebuild is separate and independent of other utility projects currently being proposed in the area. While consideration of the Vantage to Pomona Heights project may predate the Moxee-Midway rebuild, the two projects combine to cumulatively impact a vast area.

Thus, the cumulative impacts of these two project proposal must be assessed. To partition the environmental review of these two proposals and ignore the spatial, temporal and habitat relationships frustrates analysis and masks the cumulative impacts or cumulative benefits that could be realized in a comprehensive analysis. There are beneficial alternatives and mitigation measures that could be leveraged if employed on both projects that would not be realized without close coordination. The BPA Moxee-Midway Line rebuild represents a significant change in circumstance since the Vantage to Pomona Heights proposal review began. This significant change in circumstances requires a thorough reassessment of the Vantage to Pomona Heights project so that the cumulative impacts of these two projects can be assessed.

### **Project Conflict with Existing Studies and Initiatives**

Across the western United States, the decline of sage-grouse and numerous other shrub-steppe obligates has resulted in considerable study and research by various government entities and groups. The Western Governors Association has collaborated on research to identify and map crucial shrub-steppe habitat. Landscape integrity models have been developed. These maps are available. The Washington Wildlife Habitat Connectivity Working Group has completed a Statewide Analysis and a Columbia Plateau Connectivity Analysis. The maps that have resulted from those efforts point to the landscape bisected by the Vantage to Pomona Heights transmission line as some of the most important locations in the Columbia Plateau for landscape connectivity. Major segments of the Vantage to Pomona Heights Transmission Line route are repeatedly identified as priority shrub-steppe habitat. The failure to avoid or mitigate for the permanent adverse impacts to shrub-steppe habitat, obligate species and the imperiled sage-grouse is troubling. The analysis contained within the DEIS ought to reflect the results of these studies and their findings ought to influence alternatives and actions.

R

### **Fire**

The habitat threat represented by fire has not been adequately assessed. The transmission line alignment will cross a landscape highly susceptible to fire. The frequency and magnitude of these fires in this landscape is a serious threat to shrub-steppe obligates as well as other wildlife. The smaller the wildlife population, the greater the impact a fire would represent. The smaller the acreage of remaining habitat, the greater the threat a fire would pose to the remaining critical habitat. Fire impacts in shrub-steppe habitat can persist for decades. Populations of imperiled species are at high risk of extinction as habitat slowly recovers. The presence of the proposed line will increase human activity in this landscape and will introduce more sources of ignition, threatening adjacent areas of shrub-steppe and grouse habitat. The presence of the transmission lines in a fire altered landscape significantly reduces the potential of the habitat to support sage-grouse and other shrub-steppe obligate species.

S

### **Irreversible and Irretrievable Commitment of Resources**

Section 4.19 on page 4-311 of the DEIS defines the term in the following way:

*“Irretrievable commitment of resources has been interpreted to mean that those resources used, consumed, destroyed, or degraded during construction, operation, and maintenance of the proposed Project could not be retrieved or replaced for the life of the Project or beyond.”*

Approximately 60 percent of the shrub-steppe that historically occurred in Washington State has been lost. What remains is unevenly distributed and is often in a degraded state. Additionally, deep soil shrub-steppe was disproportionately converted to agriculture. Thus, the 60 percent % loss under represents the full impact. Deeper soil areas are more productive locations with respect to the vegetation they can support. The ability to create and restore shrub-steppe at a meaningful scale is an impediment to the persistence and recovery of shrub-steppe obligates. As presented, the impacts of this proposed action to the sage-grouse as well as other shrub-steppe obligate species would be irreversible. This last remaining habitat and opportunity for ecological connectivity is irreplaceable with respect to shrub-steppe obligates. The life or duration of the project, the persistent nature of the impacts and the scale of the impacts are a significant irreversible and irretrievable commitment of resources. Alternatives that would avoid or mitigate permanent adverse impacts have not been proposed by the applicant.

### **Past and Present Reasonably Foreseeable Future Actions**

The Bonneville Power Administration’s rebuild of the Midway to Moxee Transmission Line and additional wind energy generation capacity that could now be accommodated is not addressed in the DEIS. No cumulative assessment of Saddle Mountain and other proposed or potential wind projects took place.

### **Conclusion**

The proposal conflicts with direction provided in the USFWS Greater sage-grouse Conservation Objectives (COT) final report for activities within Priority Areas for Conservation (PACs). The Vantage to Pomona Heights Transmission Line alternatives demonstrate almost identical paths for significant portions of the various alternatives. Coupled with that, no consideration was given to burying discreet sections of the line in strategic locations in any of the alternatives despite the documented impacts of transmission lines on sage-grouse. Because the DEIS fails to include a reasonable range of alternatives, the DEIS is incomplete and inadequate. Additionally, the DEIS fails to recognize impacts and therefore provides no reasonable and prudent measures to avoid or mitigate adverse impacts to sage-grouse, shrub-steppe obligate wildlife and ecological connectivity across strategic areas of the shrub-steppe habitat. The DEIS fails to assess impacts from new wind power infrastructure and impacts that this new line would make feasible. The DEIS fails to adequately consider the impacts of the related actions by BPA of the Midway-

Moxee Transmission Line in the vicinity of this new proposed Vantage to Pomona Heights Transmission Line. It under represents acreage figures and the challenges associated with shrub-steppe restoration with respect to construction and vehicular impacts to vegetation. The DEIS fails to recognize, incorporate or address the findings of a number of conservation assessments or plans that specifically identify and highlight locations that this transmission line will impact. These studies include the Washington Wildlife Habitat Connectivity Working Group Statewide Analysis and Columbia Plateau Connectivity Analysis. This proposal bifurcates blocks of habitat identified in state recovery plans and targeted studies. It impacts existing suitable habitat by degrading or rendering habitat unusable for crucial life histories of the sage-grouse across a vast area. Because the DEIS fails to consider the findings of pertinent information specific to areas it will impact and employs flawed methodologies, it is impossible to accurately quantify impacts to rare species. The DEIS lacks reasonable treatment and consideration of fire and the capacity to remediate impacts. Taken as a whole, the only reasonable conclusion is that the DEIS is incomplete and inadequate.

Thank you for the opportunity to provide these comments. If you have any questions regarding these comments, please feel free to contact me. I can be reached at (509) 962-3421.

Sincerely,



Mark S. Teske, WDFW Habitat

CC: Michael Livingston, WDFW Region 3 Director  
Perry Harvester, WDFW Region 3 Habitat Program Manager

Enclosures: Internet links to WA Habitat Connectivity Working Group: Statewide Analysis and Columbia Plateau Analysis

<http://waconnected.org/statewide-analysis/>

<http://waconnected.org/columbia-plateau-ecoregion/>

References:

- 1.) U.S. Fish and Wildlife Service. 2013 Greater Sage-grouse (*Centrocercus urophasianus*) Conservation Objectives: Final Report. U.S. Fish and Wildlife Service, Denver, CO. February 2013.

### **Potential threats to Striped Whipsnakes and their habitat due to construction of the Vantage-Pomona Heights 230kV Transmission Line project**

Prepared by Lisa Hallock, Washington Department of Fish and Wildlife, 600 Capitol Way North Olympia, WA 98501-1091, Ph: (360) 902-2389, E-mail: [Lisa.Hallock@dfw.wa.gov](mailto:Lisa.Hallock@dfw.wa.gov)

The proposed routes of the Vantage-Pomona Heights 230kV Transmission Line project bisect the only remaining Striped Whipsnake occurrences known in Washington and also bisect habitat that was historically occupied by the Striped Whipsnake (Hallock 2006). The area known to be occupied extends approximately 5 miles east of the Columbia River between Highway 26 and Crab Creek. This area must be protected to make sure this species persists in the state. Within the transmission line project area, Striped Whipsnakes were documented to have occupied both sides of the Columbia River from the original town of Vantage to the Hanford Site. This habitat is important because the possibility remains that populations may persist and these lands are important for future recovery efforts. The following are potential impacts to the species and its habitat that could result from this project.

**Basalt outcrops** –It is important that construction impacts, such as excavation for footings, avoid basalt outcrops. If all basalt outcrops cannot be avoided, then the most sensitive areas for the Striped Whipsnakes (hibernacula and shedding retreats) need to be avoided. These would need to be identified with seasonally and species appropriate surveys.

**Justification** –The Striped Whipsnakes that occur in the project area are associated primarily with basalt outcrops (Hallock 2006). They shelter within the holes and fractures in these rock features and also overwinter within the basalt. The rock provides retreats from the heat of summer, aerial cover while they are basking (thermoregulating) and shelter from predators while the snakes are shedding. The same sheltering locations are used year after year (Hallock 2006). Striped Whipsnakes may live as long as 20 years (Brown and Parker 1982). This species moves to communal hibernacula for winter dormancy. This clustering is important for surviving freezing winter temperatures and for locating mates in the spring. This species has high fidelity to hibernacula (Woodbury et al. 1951) and populations have been extirpated when a local hibernaculum was destroyed (Brown and Parker 1982).

**Vegetation** – The vegetation in the area occupied by Striped Whipsnakes is shrubland with grasses (rather than shrub-steppe). Vegetation density is rather sparse and areas of bare ground occur between the vegetation. Disturbance during transmission line construction that would increase cheatgrass (*Bromus tectorum*) or other dense vegetation could threaten both the Striped Whipsnakes and their lizard prey. Any restoration activities need to take into account the native vegetation and spacing of vegetation (including bare ground) that occurs in the area in order to properly restore the habitat for species such as Striped Whipsnakes and Side-blotched Lizards.

**Justification**–Striped Whipsnakes are alert, visual and fast-moving snakes. They actively hunt for prey, primarily lizards (Brown and Parker 1982). The lizards in the area are Side-blotched

Lizards and Sagebrush Lizards (pers. obs.). In Washington, their preferred habitat is shrubland with grasses. Vegetation density is rather sparse and areas of bare ground occur between the vegetation. This allows the “gregarious” lizards to interact and hold territories. For the Striped Whipsnakes, this open habitat allows them to actively hunt for lizards. The whipsnakes hunt by moving through habitat with their head raised searching visually for the lizards. When they find one, they chase it down. The snakes also hunt from shrubs where they watch for the lizards moving on the ground.

*Other potential habitat alterations –*

Perches – Providing additional perches for raptors could result in increased predation of Striped Whipsnakes.

New roads –

- New roads degrade habitat by increasing weeds, especially cheatgrass.
- Lizards are attracted to the open habitat along the road edges. This attracts Striped Whipsnakes and makes them vulnerable to road mortality.
- New roads increase use by ATVs that indirectly (habitat degradation) and directly (road mortality) harm the Striped Whipsnakes.

References cited

- Brown, W.S. and W.S. Parker. 1982. Niche dimensions and resource partitioning in a Great Basin Desert snake community. pp.59-81. *In* N.J. Scott, ed. Herpetological communities. United States Dept. of the Interior. Fish and Wildlife Service, Wildlife Research Report 13.
- Hallock, L.A. 2006. Summary report on the Striped Whipsnake (*Masticophis taeniatus*) in Washington. Unpublished report prepared for the Bureau of Land Management, Wenatchee, Washington by the Natural Heritage Program, Olympia, Washington. 36 pp. + appendices.
- Woodbury, A.M. et al. 1951. Symposium: A snake den in Tooele County, Utah. *Herpetologica* 7:1-51.

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From: **Vicky Scharlau** <[vicky@501consultants.com](mailto:vicky@501consultants.com)>  
Date: Mon, Feb 18, 2013 at 12:57 PM  
Subject: From CBDL: Vantage to Pomona Heights EIS  
To: "[blm or wn mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)" <[blm or wn mail@blm.gov](mailto:blm_or_wn_mail@blm.gov)>  
Cc: Vicky Scharlau <[vicky@501consultants.com](mailto:vicky@501consultants.com)>

**TO:** Vantage to Pomona Heights EIS Project Manager

The Board of Trustees of the Columbia Basin Development League voted at their meeting last week to encourage the BLM to protect the highly productive and sensitive agricultural lands in the Vantage to Pomona Heights Transmission Line Project. The vote was unanimous.

The board expressed concern that the 60+ miles of transmission lines would interfere with the business of production agriculture in some of the most highly valued lands in the State of Washington within Benton, Grant, Kittitas, and Yakima Counties. We agree with the EIS assessment that ag lands (including irrigated and dry land) are highly sensitive to this type of impact and should be carefully considered both for current and potential uses.

We urge great caution when analyzing the level of impact (financial and otherwise) to producing lands especially when considering the following issues:

- A • introduction and spread of noxious weeds
- B • use of helicopters for drying and aerial spraying
- C • farm workers and equipment from inducted current
- D • GPS, cell phones, and other electronic farm equipment including center-pivot and other irrigation equipment
- E • property values
- F • minority communities
- G • aesthetics of private property

Thank you for the opportunity to comment on your proposal.

Vicky Scharlau

Executive Director

Columbia Basin Development League

203 Mission Ave., #107

POB 745

Cashmere, WA 98815

**Phone:** 509.782.9442

**Fax:** 509.782.1203

**Web:** [www.cbdl.org](http://www.cbdl.org)

**Email:** [vicky@cbdl.org](mailto:vicky@cbdl.org)



*Since 1964, we have supported the Columbia Basin Project and its future development. We protect its water rights and educate the public on the renewable resource and multiple-purpose benefits of the project.*



Schurger, William <wschurgen@blm.gov>

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## Fwd: Wanapum Comments - Vantage to Pomona Heights EIS

1 message

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**WN\_Mail, BLM\_OR** <blm\_or\_wn\_mail@blm.gov>

Fri, Mar 8, 2013 at 10:47 AM

To: William Schurger <wschurgen@blm.gov>, Sandra Gourdin <sgourdin@blm.gov>

----- Forwarded message -----

From: **Mark Deleon** <Mdeleon@gcpud.org>

Date: Fri, Mar 8, 2013 at 10:14 AM

Subject: Wanapum Comments - Vantage to Pomona Heights EIS

To: "Schurger, William C" <wschurgen@blm.gov>, "OR\_Wenatchee\_Mail@blm.gov" <OR\_Wenatchee\_Mail@blm.gov>

Cc: Jessica Lally <jessica@yakama.com>, Johnson Meninick <johnson@yakama.com>, Kate Valdez <kate@yakama.com>, Ruth Jim <ruth@yakama.com>

Attached are comments from the Wanapum Indian community on the Vantage to Pomona Heights EIS

—  
BLM Wenatchee Field Office  
915 Walla Walla Ave.  
Wenatchee, Washington 98801  
Phone: 509-665-2100  
Fax: 509-665-2121

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**Wanapum comments - Vantage to Pomona DEIS 3-8-2013.pdf**  
328K

# Wanapum

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March 7, 2013

Ms. Linda Coates-Markle  
Field Manager  
Bureau of Land Management  
915 Walla Walla Ave  
Wenatchee WA 98801-1521

Re: Comments, Vantage to Pomona Heights DEIS

Dear Ms. Coates-Markle:

Pacific Power Company proposes to construct an approximately 68- mile 230kV transmission line from Pomona Heights substation, near Selah, to Bonneville Power Administration's Vantage switchyard, near Wanapum Dam east of the Columbia River. Much of the proposed routes of the transmission line traverse a landscape on which Wanapum people have lived for thousands of years and to which we attach great cultural and spiritual significance. This landscape sustains us still, which is why we have followed the development of this project with keen interest.

On several occasions during the project scoping and development of possible routes, Pacific Power and BLM representatives met with us and neighboring Yakima Nation to hear our concerns and listen to ideas how to develop the project while respecting cultural resources. We appreciate very much knowing information shared during these meetings provided a sufficient basis to shift alternative development to alignments east of the Columbia River. Based on our review of the DEIS's analysis of eight alternatives, Wanapum concurs on the selection of the Preferred Alternative, as displayed on Figure 2-7 in the DEIS.

Although the Saddle Mountains harbor deep traditional significance to Wanapum, the preferred alternative's route over Saddle Mountains appears to potentially impact cultural resources of concern the least. We understand additional cultural resource surveys are planned for the selected route, and we will support the surveys as much as we can, knowing it is not unusual to shift the final line placement slightly due to unforeseen site conditions.

We appreciate the opportunity to comment on the DEIS. To coordinate on-the-ground activities with Wanapum as this project moves forward, please contact Ms. Alyssa Buck at 509-754-5088 x2357 or [abuck1@gcpud.org](mailto:abuck1@gcpud.org)

Sincerely,



Rex Buck, Jr.  
Wanapum Leader



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## Vantage to Pomona Draft EIS Comments

1 message

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**Kelly, Stuart** <Stuart.Kelly@pacificorp.com>

Fri, Mar 8, 2013 at 4:23 PM

To: "Coates-Markle, Linda" <lcmarkle@blm.gov>, John Everingham <jevingham@powereng.com>, Janet Hutchison <j1hutchi@blm.gov>, William Schurger <wschurges@blm.gov>, "BLM\_OR\_WN\_Mail@blm.gov" <BLM\_OR\_WN\_Mail@blm.gov>

Cc: "Aniello, John" <John.Aniello@pacificorp.com>

[Please find attached the proponent's comments](#)



**Vantage to Pomona draft EIS comments.pdf**

178K

March 8, 2013

US Dept. of the Interior  
Bureau of Land Management  
ATTN: Vantage to Pomona Heights EIS  
915 Walla Walla Avenue  
Wenatchee, WA 98801

To Whom It May Concern:

Thank you for the opportunity to comment on the Vantage to Pomona Heights 230 kV Project. Pacific Power has reviewed the Draft Environmental Impact Statement, and offers the following comments and observations.

Representatives for Pacific Power attended public meetings on the DEIS in Selah and Desert Aire, on February 5 and 6, 2013. In addition, Pacific Power has been involved in ongoing discussions with landowners along the DEIS identified Agency Preferred Route.

As a result of specific conversations with the landowners along the DEIS Agency Preferred Route, it has become clear that these landowners have a number of concerns regarding impacts to agricultural operations, aerial spraying operations, and other land use impacts that would occur as a result of the implementation of Alternative D (Agency Preferred Route). These landowners have also raised concerns to Pacific Power representatives about previous alternatives not currently being considered that do not impact agricultural operations, such as those that traverse the Yakima Training Center (YTC).

Pacific Power is fully aware that impacts to landowners and agricultural operations will occur as a result of the implementation of any alternative that crosses these sensitive areas. However, we are also confident that these impacts will not be significant, and we will minimize, to the extent possible, impacts that result from the construction and operation of this project. Pacific Power has and will continue to work with all affected landowners to address their concerns when designing and constructing the various elements of the project.

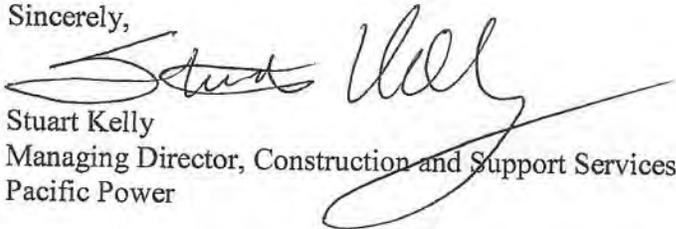
As a result of the public comments on the DEIS and specifically the Agency Preferred Alternative, Pacific Power has again reviewed reliability standards established by the Western Energy Coordinating Council (WECC) and North American Electric Reliability Corporation (NERC), through NERC Planning Standards (WSCC-S2). Recently, the standards have been revised and are less restrictive than those that were in place when a previous alternative, through

A

the Yakima Training Center on its north side, were eliminated from detailed analysis in the DEIS due to WECC separation criteria from existing Pomona-Wanapum 230 kV transmission line. Previously, the separation criteria stated that a new transmission line could be no less than one span length (of the existing line, between structures) from the line that was being paralleled, and applied to transmission lines above 200 kilovolts (kV). In the case of the alternatives being considered on the north side of YTC, this separation distance was over 3,000 feet in some locations. This distance required the placement of the line in areas that would create conflicts with YTC aerial operations and military training on the facility, and ultimately the mission of YTC. The alternative in this area was eliminated because the Army stated (in a letter dated May 28, 2010) that it would require the project to be placed underground through YTC. The ten to twenty-fold increase in project cost, ultimately to be paid by the Pacific Power ratepayers, made that alternative infeasible.

Pacific Power understands that new and modified WECC/NERC standards now apply to transmission lines above 300 kV and allow as much closer distance between the existing Pomona-Wanapum line and the proposed Vantage-Pomona Heights transmission line. This would allow the new line to be placed closer to the existing line through YTC thereby eliminating impact to YTC operations. Pacific Power believes that the new separation will allow the project to be compatible with the training operations ongoing within YTC. Because of these reasons, this alternative should be reconsidered as an alternative analyzed in detail in the EIS.

Sincerely,



Stuart Kelly  
Managing Director, Construction and Support Services  
Pacific Power

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# **SUPPLEMENTAL DRAFT EIS PUBLIC COMMENT LETTERS AND RESPONSES**

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**From:** [restes@blm.gov](mailto:restes@blm.gov) on behalf of [Vantage Pomona, BLM OR](#)  
**To:** [Dave Dean 6305](#)  
**Cc:** [J Vacca](#); [Sandra Gourdin](#); [Cindy Lysne 6153](#); [John](#)  
**Subject:** Fwd: Vantage to Pomona Heights SDEIS  
**Date:** Friday, January 02, 2015 10:54:57 AM

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Hello Dave:

Please draft a draft response for John Aniello and me to review and approve and please file with the SDEIS Public Comments & Admin Record.

Thank you & Happy New Year.....Robin

----- Forwarded message -----

**From:** **Katie Walker** <[ktmahalo59@gmail.com](mailto:ktmahalo59@gmail.com)>  
**Date:** Wed, Dec 31, 2014 at 1:45 PM  
**Subject:** Vantage to Pomona Heights SDEIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

Hello,

My name is Katie Ableidinger Walker. We've been receiving letters from you in regards to the Vantage to Pomona Heights SDEIS. I believe we have land located in the area that is going to be affected by this decision. The parcel number for the land is 191303-33402 and it's under the Robert Ableidinger Trust. My question is, how will our parcel be affected by this decision and when will the construction begin? Also, will we be compensated if you go through our property and how will it affect the cost of our property if we were to sell it?

Sincerely,  
Katie Ableidinger Walker

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135

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**From:** [restes@blm.gov](mailto:restes@blm.gov) on behalf of [Vantage Pomona, BLM\\_OR](#)  
**To:** [Dave Dean 6305](#)  
**Cc:** [Cindy Lysne 6153](#); [J Vacca](#); [Linda Coates-Markle](#); [Sandra Gourdin](#); [John](#)  
**Subject:** Fwd: proposed power line  
**Date:** Monday, January 05, 2015 9:45:39 AM

---

Hello Dave:

Please draft a response for my review & approval. I'd like to respond to both these emails by COB today.

Thank you & Happy New Year.....Robin

----- Forwarded message -----

**From:** **ERIC and NICOLE STONEMETZ** <[stonemetzclan@msn.com](mailto:stonemetzclan@msn.com)>  
**Date:** Sun, Jan 4, 2015 at 4:32 PM  
**Subject:** proposed power line  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>

A Hello my name is Eric Stonemetz. I live at 361 firing center rd. here in east Selah. can you please send me a copy of where the line is going to be run on a map with actual roads on it. so I can tell if it is going to be over my property or along my property etc.. Thank You

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135

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DA

# Vantage to Pomona Heights 230 kV Transmission Line Project Supplemental Draft Environmental Impact Statement

## COMMENT FORM

The Bureau of Land Management (BLM) is seeking written comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed 230 kV transmission line. Comments on the SDEIS should be as specific as possible. It would also be helpful if comments referred to pages, chapters, and/or sections of the SDEIS. Comments may address the adequacy of specific analyses in the SDEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

For all comments submitted, please identify whether you are submitting them as an individual or as the designated spokesperson on behalf of an organization. All comment submittals must include the commenter's name and address.

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

Comments must be submitted by February 17, 2015.

Date: 1-28-15  
First Name: Joyce Last Name: Edie  
Organization/Affiliation (if any): Mattawa Area Needs  
Address: 22939 Rd T SW  
City: Mattawa State: WA Zip: 99349  
E-mail Address: theman@smwireless.net Phone: 509 932 4602

Please note the categories that apply to you:

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Project Area
- Organization Representative

My comments on the Vantage to Pomona Heights 230 kV Transmission Line Project are:

The new transmission line needs to go thru the Yakima Firing Range. Going thru farmland is not a good ~~so~~ solution for the people of Grant County, especially since this power benefits Yakima County. The northern route is shorter & will disrupt less private land. Thank you for

Considering the citizens!

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# Vantage to Pomona Heights 230 kV Transmission Line Project Supplemental Draft Environmental Impact Statement

## COMMENT FORM

The Bureau of Land Management (BLM) is seeking written comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed 230 kV transmission line. Comments on the SDEIS should be as specific as possible. It would also be helpful if comments referred to pages, chapters, and/or sections of the SDEIS. Comments may address the adequacy of specific analyses in the SDEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

For all comments submitted, please identify whether you are submitting them as an individual or as the designated spokesperson on behalf of an organization. All comment submittals must include the commenter's name and address.

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

Comments must be submitted by February 17, 2015.

Date: 1/28/15  
 First Name: Keith Last Name: Eddie  
 Organization/Affiliation (if any) \_\_\_\_\_  
 Address: 22939 Rd 7sw  
 City: matanza State: wa Zip: 99349  
 E-mail Address: \_\_\_\_\_ Phone: 932 4602

Please note the categories that apply to you:

- Renter/Leaser
- Resident Property Owner
- Non-Resident Property Owner
- Business Owner
- Government Official
- Resident Outside Project Area
- Organization Representative

My comments on the Vantage to Pomona Heights 230 kV Transmission Line Project are:

A Put in the one crossing  
The Fryer Center, it  
just makes sense

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United States Department of the Interior  
Bureau of Land Management  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801

Vantage to Pomona Heights 230 kV Transmission Line Project  
Supplemental Draft Environmental Impact Statement

OPEN HOUSE

Wednesday, January 28, 2015  
6:00 p.m. to 8:00 p.m.  
Sagebrush Senior Center  
441 Desert Aire Drive North  
Mattawa, Washington 99349

COMMENTS

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CHUCK FULLER

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DOROTHY BOZORTH

I like the new route that goes over the river and around the northern. I live on the other side by Burkett Lake. We already have three. I have one on one side and two on the other side. We don't  
<sup>A</sup> need any more on our side. I live on Lower Crab Creek Road out of Beverly, so. What else is there. That's pretty much it. I can't see if we put one more. I only have two acres. We're really tight there already.

1 ROBERT REED CHRISTENSEN

2  
3 We have property under this 3c, adjacent to  
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JAMES ECKENBERG

I prefer the north route, NNR-7 I believe is the new route, for the simple fact it makes common sense, being the roads are already there. And it's less impact to the public. The south route through the wahluke slope impacts the agriculture for the reasons of interfering with irrigation, interfering with crop dusting and adversely opposing homes. It goes over the top of a couple of houses.

So basically I prefer to go on a different route out of where it does economical harm. Just common sense says a shorter route is better. Paralleling the existing power line on the north route makes common sense. The infrastructure is already there.

(OPEN CONCLUDED AT 8:00 P.M.)

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C E R T I F I C A T E

STATE OF WASHINGTON) )  
COUNTY OF YAKIMA ) ss.

THIS IS TO CERTIFY that I, Dorene Boyle,  
Certified Court Reporter in and for the State of  
Washington, residing at Yakima, reported the within and  
foregoing statements; said statements being taken before me  
as a Certified Court Reporter on the date herein set forth;  
that said statements were taken by me in shorthand and  
thereafter under my supervision transcribed, and that same  
is a full, true and correct record of the statements of  
said participants.

I further certify that I am not a relative or  
employee or attorney or counsel of any of the parties, nor  
am I financially interested in the outcome of the cause.

IN WITNESS WHEREOF I have hereunto set my hand  
this \_\_\_\_ day of \_\_\_\_\_, 2015.

CERT/LIC NO. 2521 \_\_\_\_\_  
Certified Court Reporter in and for the  
State of Washington, residing at Yakima

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United States Department of the Interior  
Bureau of Land Management  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801

Vantage to Pomona Heights 230 kV Transmission Line Project  
Supplemental Draft Environmental Impact Statement

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Sagebrush Senior Center  
441 Desert Aire Drive North  
Mattawa, Washington 99349

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C E R T I F I C A T E

STATE OF WASHINGTON) )  
COUNTY OF YAKIMA ) ss.

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United States Department of the Interior  
Bureau of Land Management  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801

Vantage to Pomona Heights 230 kV Transmission Line Project  
Supplemental Draft Environmental Impact Statement

OPEN HOUSE

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6:00 p.m. to 8:00 p.m.  
Sagebrush Senior Center  
441 Desert Aire Drive North  
Mattawa, Washington 99349

COMMENTS

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United States Department of the Interior  
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Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801

Vantage to Pomona Heights 230 kV Transmission Line Project  
Supplemental Draft Environmental Impact Statement

OPEN HOUSE

Thursday, January 29, 2015  
6:00 p.m. to 8:00 p.m.  
Selah Civic Center  
216 South First Street  
Selah, Washington 98942

COMMENTS

JACK W. EATON

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3           This part here where they come across the  
4 military on the existing line, we're not opposed to  
5 that, but I was concerned about this loop that goes  
6 way up the hill around because that comes down through  
7 our property for an additional three miles. well, it  
8 must be close to three miles. It goes clear up to the  
9 top of the Manastash Ridge where they're coming  
10 across.

11           But the military owns on the north side of this  
12 ridge that runs -- that they're coming around.  
13 There's a road that comes in by the interchange that  
14 would make -- if this line had to been buried out  
15 there, I don't know why it would have to be buried to  
16 go up around here to come out for the interchange.  
17 It's just an old road that they used to haul water  
18 across through there. Bentley Kern, it used to be  
19 their property, and he hauled water down over it.  
20 It's kind of a canyon, and hauling there.

21           When you get the military interchange, there's a  
22 staging area or a gravel pit and all that spreads out  
23 wider than the freeway, and just south of that the  
24 line gets back over to the existing I-82 fence. So it  
25 looks like they could come over the freeway with

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possibly an overhead and not have to reach so far  
across that interchange area. And then come down and  
meet the -- come along the highway along I-82 and meet  
the line that is already coming across the road here,  
the one that comes onto our property.

And I don't know why they should have to bury  
that new line and not bury the old one. It seems -- I  
don't understand. I'm not trying to tell the Army  
what to do out there. But I guess that's all I wanted  
to say.

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C E R T I F I C A T E

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**From:** [Dave Dean 6305](#)  
**To:** [Patsy Friend 6347](#)  
**Cc:** [Cindy Lysne 6153](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Thursday, February 12, 2015 12:46:32 PM

---

DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**

[www.powereng.com](http://www.powereng.com)

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Thursday, February 12, 2015 12:13 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record.

I'll craft a short response to her thanking her for her comment and assuring her that we will notify her of future meetings and progress on the proposed project.

----- Forwarded message -----

**From:** Pam Ray <[pamray@smwireless.net](mailto:pamray@smwireless.net)>  
**Date:** Thu, Feb 12, 2015 at 8:22 AM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

---

**From:** Pam Ray [mailto:[pamray@smwireless.net](mailto:pamray@smwireless.net)]  
**Sent:** Wednesday, February 11, 2015 9:26 PM  
**To:** '[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)'  
**Subject:** Vantage to Pomona Heights 230 kV Transmission Line Project SDEIS Project Manager

Hello:

I'm Pam Ray. On your records per mailings I'm: Jerry and Pamalia Ray, PO Box 175, Beverly, WA 99321. Well, of course I don't live in a PO Box. My home is located at 15597 Rd T.5 SW, Beverly, WA. Some refer to it as Royal City. But it is the first closest home you come to while following the existing 500 kV power lines from the Vantage substation and the existing 230 kV power Transmission line from this substation to Walla Walla.

My home is located between these two power transmission line. I am having problems with static electricity in my home and my body. When I go to work on any fencing around here I was wearing rubber boots and gloves. Well, they don't work with static electricity. It is not controlled by any kind of ground.

I attended a meetings earlier at Mattawa and Desert Aire, with maps showing where the plan is to put another 230 kV power line across my property between the two existing transmission power lines. Your new plan was to put it as close as possible to my home.

A

I totally object. My husband is buried in a garden on the river side of my home, which would put him in the setback area where the plan is for the new power line. That is totally unacceptable as you will need access by vehicle for installation and maintenance. I will not allow anyone to drive over or near my husband final resting place!

A

The road and installation will wipe out an existing pasture with automatic underground irrigation that I have water rights for. And would require rearrangement of my fencing.

Totally, out of the question. I really love where I live and did so before you folks came bothering around.

A

Even before reading your “Supplemental Draft Environmental Impact Statement for the Vantage to Pomono Heights 230 kV Transmission Line Project”, I was for it. To cross the river and take the power line over the hill with existing roads, tower lights etc. is the easiest and closest way for it to go. It really makes since. So, I don’t exactly know what to say. I am guessing at how you want me to respond So, I say: “I am in favor of the NNR Alternative”. To me, that is from the Vantage Power plant, east of Wanapum Dam, across the Columbia River (West) and over the hill to Selah, using existing roads and the least encumbering as possible.

I was not notified about the latest meeting at Desert Aire, as promised by your earlier letter, or I would have been there.

Sincerely,

Pam Ray  
Pamalia L. Ray

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager

Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

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**From:** [Dave Dean 6305](#)  
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**Cc:** [Cindy Lysne 6153](#)  
**Subject:** FW: Vantage to Pomona Heights  
**Date:** Friday, February 13, 2015 2:15:25 PM

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DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**

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---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Friday, February 13, 2015 2:06 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights

FYI & For the Record

----- Forwarded message -----

**From:** <[MAIDENSTON@aol.com](mailto:MAIDENSTON@aol.com)>  
**Date:** Thu, Feb 12, 2015 at 9:31 PM  
**Subject:** Vantage to Pomona Heights  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

Good Evening And thanks for the opportunity for us 2 ( Margie and Dick Angel)to give input. We are from the Seattle, Wa. area, originally. We now live in So. Cal. ( Wish we had some of your rain down here!). I have read,online some of the papers and alternatives to this enormous project. It is, of course a needed project and it covers a wide area of suppositions as to land, soil, vegetation,wild animals,water rights and also different cities,Counties, State and Federal Agencies. Also is the fact that we have a choice of alternatives.

We come up to Seattle-Spokane-Yakima area at least once, sometimes twice a year. We also have property on Whidbey Island. We are of the opinion that we pick the Sdeis NW alternative. It keeps it simple and with overhead transmission lines it seems safer.

Regards; And with Respect;  
Dick A. & Margie L. Angel  
(951) 587-6956

A

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Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager

Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Dave Dean 6305](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Cindy Lysne 6153](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Friday, February 13, 2015 2:13:00 PM

---

DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**

[www.powereng.com](http://www.powereng.com)

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Friday, February 13, 2015 2:00 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** J Vacca; Linda Coates-Markle; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** <[ronda654321@yahoo.com](mailto:ronda654321@yahoo.com)>  
**Date:** Fri, Feb 13, 2015 at 11:48 AM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>

A I am a resident of Grant County who will be directly affected by the decision on the Vantage to Pomona Heights Transmission line. I live along the Mattawa route which proposes the transmission line to go over a field on my property. I am against this route. The field is currently in asparagus and would be disruptive to our farming operation. In addition it is only a half mile from my house. We already have a major power line running within a half-mile on the other side of my house.

I am in favor of the New Northern Route which has the most benefits. It is shorter and impacts people's lives the least.

Please select the New Northern Route for the Vantage to Pomona Heights Transmission line.

Thank you,  
Ronda Yorgesen  
24464 RD M.5 SW  
Mattawa, WA 99349

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

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Spokane District Records Manager

Attn: Vantage to Pomona Heights Supplemental Draft EIS

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Spokane, WA 99212

Fax: 509-536-1275

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Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Dave Dean 6305](#)  
**To:** [Darrin Gilbert 6123](#); [John Everingham 6244](#); [Patsy Friend 6347](#)  
**Cc:** [Cindy Lysne 6153](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Friday, February 13, 2015 2:13:31 PM

---

DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**

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---

**From:** [restes@blm.gov](mailto:restes@blm.gov) [mailto:[restes@blm.gov](mailto:restes@blm.gov)] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Friday, February 13, 2015 2:02 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** J Vacca; Linda Coates-Markle; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** **Kevin Yorgesen** <[kevron@smwireless.net](mailto:kevron@smwireless.net)>  
**Date:** Fri, Feb 13, 2015 at 12:59 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

I am writing to give my support to the New Northern Route that has been proposed for the Vantage to Pomona Heights 230 kV Transmission Line Project versus the Mattawa Route.

The New Northern Route is clearly the most economic choice as it is 40 miles shorter than the Mattawa Route. In Addition, taking the Mattawa Route would require either the purchasing or leasing of ground. It would also cause disruption to the farming along this route which would include practices such as crop dusting and management of the canal systems.

A

I know that there is a concern for the Sage Hen habitat along the New Northern Route. As there is a power line already in existence along this route, adding an additional parallel power line should actually provide a corridor to better protect this habitat. I believe that the line could be installed with minimum impact to their habitat and in the end be beneficial.

I strongly encourage that the New Northern Route be selected as the preferred route from Vantage to Pomona Heights. The disadvantages of the Mattawa Route far outweigh the advantages of the New Northern Route.

Sincerely,

Kevin Yorgesen  
24464 Rd. M.5 SW  
Mattawa, WA 99349

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Dave Dean 6305](#)  
**To:** [John Everingham 6244](#); [Darrin Gilbert 6123](#); [Patsy Friend 6347](#)  
**Cc:** [Cindy Lysne 6153](#)  
**Subject:** FW: Vantage to Pomona heights draft and EIS  
**Date:** Friday, February 13, 2015 2:14:02 PM

---

DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**

[www.powereng.com](http://www.powereng.com)

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Friday, February 13, 2015 2:04 PM  
**To:** Cindy Lysne 6153; Dave Dean 6305  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona heights draft and EIS

FYI & For the Record

----- Forwarded message -----

**From:** **Jef Gallacci** <[jefgallacci@gmail.com](mailto:jefgallacci@gmail.com)>  
**Date:** Fri, Feb 13, 2015 at 7:45 AM  
**Subject:** Vantage to Pomona heights draft and EIS  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>

A My strong opinion is for the northern route versus the Mattawa area routes.

Please accept this as my public comment.

Jef Gallacci  
509-740-4004

Sent from my iPhone

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

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Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
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Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Tuesday, February 17, 2015 1:03:32 PM  
**Attachments:** [Scan 1.pdf](#)  
[Scan 2.pdf](#)

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 12:59 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** **Brad Albin** <[balbin@mbcyakima.com](mailto:balbin@mbcyakima.com)>  
**Date:** Mon, Feb 16, 2015 at 2:44 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>

Please review and submit attachments.

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135

# Vantage to Pomona Heights 230 kV Transmission Line Project Supplemental Draft Environmental Impact Statement

## COMMENT FORM

The Bureau of Land Management (BLM) is seeking written comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed 230 kV transmission line. Comments on the SDEIS should be as specific as possible. It would also be helpful if comments referred to pages, chapters, and/or sections of the SDEIS. Comments may address the adequacy of specific analyses in the SDEIS, and the merits of the alternatives formulated and discussed in the document (refer to Council on Environmental Quality regulations at 40 Code of Federal Regulations (C.F.R.) 1503.3).

For all comments submitted, please identify whether you are submitting them as an individual or as the designated spokesperson on behalf of an organization. All comment submittals must include the commenter's name and address.

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

Comments must be submitted by February 17, 2015.

Date: 2-14-2015  
First Name: Michael + CHERYL + Richard Last Name: ALBIN  
Organization/Affiliation (if any): \_\_\_\_\_  
Address: (760 SAGE TRAIL Road) (695 Sage Trail RD) (693 Sage Trail RD)  
City: YAKIMA State: WA Zip: 98901  
E-mail Address: mikes.tile@hotmail.com Phone: 509 952 1084

Please note the categories that apply to you:

- |   |  |
|---|--|
| <input type="checkbox"/> Renter/Leaser                      | <input type="checkbox"/> Government Official           |
| <input checked="" type="checkbox"/> Resident Property Owner | <input type="checkbox"/> Resident Outside Project Area |
| <input type="checkbox"/> Non-Resident Property Owner        | <input type="checkbox"/> Organization Representative   |
| <input type="checkbox"/> Business Owner                     |  |

My comments on the Vantage to Pomona Heights 230 kV Transmission Line Project are:

I oppose the construction of the proposed power lines based on the following: (1) They are being constructed on a

- A private road that is maintained by the property owners of Sage Trail Rd. It is not county maintained. This has been mentioned several times and ignored. Where is documentation that access has been granted. (2) Bridge over canal was built +
- B rebuilt and maintained by the property owners of Sage Trail Rd. Who was/had permission to repeated use of heavy equipment over the bridge + who will do any repairs? (3) Proposed Power lines cross over my property. According to paperwork
- C attached to this document, I have to wait until final approval "before" an offer on the property will be obtained from P&L. Why? (4) We have not been duly informed of meetings. Only 2 letters + 1 generic radio announcement of "there is a meeting" but no time, date or place stated. (5) Previous letters have gone unanswered. (6) Route is unclear.
- D Need to know exact location of the poles. Have only been told its on the north side of the road. Current

Vantage to Pomona Heights  
Transmission Line Project  
Spokane District, Records Manager  
1103 North Fancher Road  
Spokane, Washington 99212

Affix  
stamp  
here

**Bureau of Land Management**

Spokane District, Records Manager  
Attn: Vantage to Pomona Heights SDEIS  
1103 North Fancher Road  
Spokane, Washington, 99212

(fold along line and tape edges to mail)

poles go through my property, not on the edge. Current poles seem to have been set for ease of PPL, by next to or on the actual road. Why is route being diverted in the middle of the valley? All I have been told (at last meeting) is that it is cheaper. If so, why is it turned & twisted to miss other landowners, except here where it obstructs our views and can cause a decrease in property value. At last meeting was told that would have no affect on property values, which many are "view" properties. (8) We had a pole last summer (which sits at the end of our driveway) that was damaged. When crews repaired pole <sup>that</sup> left my driveway tore up & left. No repairs to damage, which I had to fix myself. Am concerned damage that will/may be done during construction will also go unattended. I have already experienced lack of disregard for my property. (9) No clear cut answers. None. Have talked to people on the phone & at meeting. Nothing. (10) Representatives at the meeting haven't viewed the proposed area in person. They are only going off photos, so there was no real understanding of where the property owners concerns are coming from. (11) Why are obvious established right of ways not being utilized? (12) Would like answers to our questions to be addressed directly.

Thank you for your participation.

**For additional information:**

Online at: [www.blm.gov/or/districts/spokane/plans/vph230.php](http://www.blm.gov/or/districts/spokane/plans/vph230.php)  
Project contact telephone number: (509) 665-2100  
Project e-mail address: [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

THIS PAGE INTENTIONALLY LEFT BLANK.

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Tuesday, February 17, 2015 12:55:10 PM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 12:52 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** Jerry <[jcyorg@gmail.com](mailto:jcyorg@gmail.com)>  
**Date:** Sun, Feb 15, 2015 at 10:49 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>

A I jerry Yorgesen am a farmer and land owner in Mattawa. The northern route should be the primary option for the power lines. The northern route is shorter, should be less expensive, and doesn't travel over land that does not receive any of the electricity. The line option going over Mattawa will cross land that I currently farm. I do not want power lines interfering with my circle pivot irrigation. It should be the northern route, people are of more value than the 'worried about sage hen'. Use some common sense.

Jerry Yorgesen  
15555 RD 25 SW  
MATTAWA WA 99349

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Vantage to Pomona Heights Supp. Draft EIS  
**Date:** Tuesday, February 17, 2015 12:55:39 PM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 12:54 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supp. Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** **Carol Martinez** <[moxeecarol@gmail.com](mailto:moxeecarol@gmail.com)>  
**Date:** Mon, Feb 16, 2015 at 2:18 PM  
**Subject:** Vantage to Pomona Heights Supp. Draft EIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

A As a concerned landowner affected by the previously preferred power line routing south of the training center and passing through the Mattawa area, I heartily support the new northern route described in the above referred document. The NNR alternative with overhead power lines would appear to be the wisest choice from a tax payer and PPL customer perspective. Again, many of us are relieved that the NNR is being strongly considered. The southern route should no longer be seriously considered.  
Sincerely, Carol Martinez, S. Martinez Livestock, . 13391 SR 24, Moxee, WA 98936

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](#)  
**To:** [Darrin Gilbert 6123](#); [Patsy Friend 6347](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Tuesday, February 17, 2015 1:03:34 PM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 1:01 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** **David Yorgesen** <[dfyorg3@gmail.com](mailto:dfyorg3@gmail.com)>  
**Date:** Mon, Feb 16, 2015 at 3:56 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

A I am writing to support the New Northern Route for the Vantage to Pomona Heights transmission line. It is a shorter route and should be less expensive and would not further add to the desecration of the farm land in the Mattawa area. We already have enough power lines making it hazardous for spraying operations.

Please give serious consideration to the merits of this northern route.

David Yorgesen  
307 Davidson Blvd  
Mattawa

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Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
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Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

Christy Malone  
491 Sage Trail Rd.  
Yakima WA 98901

Bureau of Land Management  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801

February 17, 2015

To whom it may concern:

B I am writing this letter in opposition to a change in the route of the New Northern Route proposed by Pacific Power, as well as to seek mitigation for the impacts placed on our road by same. I wrote a comment letter regarding the original proposal and never received ANY further communication from your department or Pacific Power with regard to this new proposal or the open house held last week, hence the submission of this letter on the due date.

A Sage Trail Road is a private road maintained by individual homeowners, not a homeowners association or by Yakima County. The single lane bridge that crosses the Selah Moxee Canal needs replacement the beams are very old and cracking which is causing the cover on top of the bridge to erode as the support is weakened below it. The equipment and trucks crossing our bridge are multi axel vehicles of much greater weight than the structure was built to support for a continued period of time. Our road is gravel and easily rutted. Heavy vehicles will only increase the movement of the gravel off the road and the washboard effect that results. This is an unfair burden to place on homeowners whose only means of maintaining their road and bridge is an annual garage sale that might net \$1000 in a good year

B With regard to the line placement, we were told the lines would run parallel to the existing 230 volt line that runs along the ridge from the Pomona Heights substation to Terrace Heights. We were also told this additional power was to supply growing need in Moxee Now we are told the lines will drop down and run along Sage Trail Road and cut across the Yakima Training Center. Worse the place they propose to drop the lines off the ridge cuts right in front of 6 peoples homes, when a route placed to drop down from the ridge and cut across Shotgun Road would impact nobody.

I worked for a county planning department in Nevada, never have I heard of deciding your route and placing the equipment in advance of procuring Rights of Way and proper hearings to address homeowners concerns. As mentioned I received no paperwork or notice of any kind pertaining to this latest action. One of my neighbors called to ask if I was writing a letter about this latest proposal (NNR) last week when I was out of town, which was the first I had heard of it. Had she not copied her information for me, I would have been unable to be included in this survey.

Thank you for your time and I would appreciate it if you would add my name and address (above) to any future notifications.

Sincerely

Christy Malone  
509-453-5853

THIS PAGE INTENTIONALLY LEFT BLANK.

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Tuesday, March 03, 2015 12:45:44 PM

---

Thanks,  
Cindy

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 6:40 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** Cheryl Wolff <[cmwolff@smwireless.net](mailto:cmwolff@smwireless.net)>  
**Date:** Tue, Feb 17, 2015 at 3:28 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

I live in South Grant County, WA State, specifically Desert Aire.

I agree with the most desired route for the Transmission Line Project: On the West Side of the Columbia River, mostly on the Yakima Training Center. I disagree with the route that travels mostly through the Wahluke Slope Farmland. The Farmland route is detrimental to farming and to those living in the area.

Cheryl R. Wolff  
323 Buttercup Ln SW  
Desert Aire WA 99349

--

Spokane District, Bureau of Land Management  
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Fax: 509-536-1275

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Points of Contact:

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J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#)  
**Cc:** [Dave Dean 6305](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Tuesday, February 17, 2015 10:28:06 AM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 10:27 AM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** **Pam Ray** <[pamray@smwireless.net](mailto:pamray@smwireless.net)>  
**Date:** Fri, Feb 13, 2015 at 7:42 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

Hello

I'm Pam Ray, (Jerry and Pamalia Ray, PO Box 175, Beverly, WA 99321) Location: 15597 Rd. T.5 SW, Beverly, WA, 99321. You can't find it on a GPS, it won't show.

A I am for the newest route for your power line that I have seen. I believe you refer to it as the: Supplemental Draft Environmental Impact Statement for the Vantage to Pomona Heights 230 kV Transmission Line Project. For the new 230 kV power line to go from the Vantage substation located east of Wanapum Dam, westward across Hwy. 243, across the Columbia River and follow the existing power lines, and existing roads makes since, overhead.

Your other Draft Environment Impact Statements have been not acceptable by me.

Sincerely,

Pam Ray  
Pamalia L. Ray

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:

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Fax: 509-536-1275

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J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Tuesday, February 17, 2015 12:54:37 PM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 12:50 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record.

----- Forwarded message -----

**From:** Lorene Ford <[reneclint@gmail.com](mailto:reneclint@gmail.com)>  
**Date:** Sun, Feb 15, 2015 at 9:46 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

A Project Manager, We approve the route following the old 230kv line. Albert C. & M.  
Lorene Ford

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135

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**From:** [Cindy Lysne 6153](mailto:Cindy.Lysne@blm.gov)  
**To:** [Patsy Friend 6347](mailto:Patsy.Friend@blm.gov); [Darrin Gilbert 6123](mailto:Darrin.Gilbert@blm.gov); [John Everingham 6244](mailto:John.Everingham@blm.gov)  
**Cc:** [Dave Dean 6305](mailto:Dave.Dean@blm.gov)  
**Subject:** FW: BLM Vantage to Pomona power line EIS  
**Date:** Tuesday, February 17, 2015 1:03:49 PM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 1:03 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: BLM Vantage to Pomona power line EIS

FYI & For the Record

----- Forwarded message -----

**From:** **Richard Leitz** <[richardleitz@icloud.com](mailto:richardleitz@icloud.com)>  
**Date:** Mon, Feb 16, 2015 at 3:59 PM  
**Subject:** BLM Vantage to Pomona power line EIS  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>  
**Cc:** "[warnick.judy@leg.wa.gov](mailto:warnick.judy@leg.wa.gov)" <[warnick.judy@leg.wa.gov](mailto:warnick.judy@leg.wa.gov)>, [tom.dent@leg.wa.gov](mailto:tom.dent@leg.wa.gov), [mannweller.matt@leg.wa.gov](mailto:mannweller.matt@leg.wa.gov), Cindy Carter <[ccarter@co.grant.wa.us](mailto:ccarter@co.grant.wa.us)>

A After reading your EIS and northern route supplemental EIS along with impact comparisons, it is a common sense decision to use the northern route choice. This route has similar or less impact both environmentally and socially than other options. It also has the caveat of impacting private property the least which makes it most desirable. In reading your EIS, you mention numerous times that FERC wanted this line put in for power supply and redundancy to benefit Benton, Grant and Yakima counties. Why did Grant county opt out, and what are specific benefits to be realized by Grant county they don't already enjoy?

Once again, the Northern Route is the only option that makes good sense.

Sincerely,  
Richard Leitz  
22758 RD U.2 SW  
Mattawa, WA 99348  
509-830-3248  
[Richardleitz@hotmail.com](mailto:Richardleitz@hotmail.com)

Sent from my iPad

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:

Spokane District Records Manager

Attn: Vantage to Pomona Heights Supplemental Draft EIS

1103 North Fancher Road

Spokane, WA 99212

Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS  
**Date:** Tuesday, February 17, 2015 1:04:56 PM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 1:04 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS

FYI & For the Record

----- Forwarded message -----

**From:** **Vickie Barela** <[VBarela@kvhealthcare.org](mailto:VBarela@kvhealthcare.org)>  
**Date:** Tue, Feb 17, 2015 at 4:06 AM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>

A We own a ranch at the end of Badger Pocket. In regards to the proposed transmission line, we support the route that crosses the Yakima Firing Range. It appears to be a more direct route therefore costing less. Also, we already have one power line crossing our pasture and most definitely do not want another one which would reduce our property value.

Ron and Vickie Barela  
420 Buffalo Lane  
Ellensburg, WA 98926

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](mailto:Cindy.Lysne@blm.gov)  
**To:** [Patsy Friend 6347](mailto:Patsy.Friend@blm.gov); [Darrin Gilbert 6123](mailto:Darrin.Gilbert@blm.gov); [John Everingham 6244](mailto:John.Everingham@blm.gov)  
**Cc:** [Dave Dean 6305](mailto:Dave.Dean@blm.gov)  
**Subject:** FW: Vantage to Pomona Heights SDEIS  
**Date:** Tuesday, February 17, 2015 1:12:26 PM

---

**From:** [restes@blm.gov](mailto:restes@blm.gov) [mailto:[restes@blm.gov](mailto:restes@blm.gov)] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 1:09 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Pomona Heights SDEIS

FYI & For the Record

----- Forwarded message -----

**From:** **Scott Diefenbach** <[cwp@smwireless.net](mailto:cwp@smwireless.net)>  
**Date:** Tue, Feb 17, 2015 at 9:34 AM  
**Subject:** Vantage to Pomona Heights SDEIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

I agree with the SDEIS analysis and the advantages it identified that were associated with the NNR Alternative Route.

A -reduced overall transmission line length which would provide reduced resource impacts on several issues  
-reduced transmission line length across non federal lands; has less impact on land use, public health and safety, and other issues  
compared to the DEIS Alternative  
-reduced overall disturbance footprint; reducing resource impacts to wildlife habitat, military training, soils, water resources and other  
issues compared to the DEIS Alternative.

Looking at the map the NNR is to the most logical route to take. It is shorter, it would have the least amount of resource impact.

The DEIS Route would have a negative resource impact on the areas it would pass through.

I appreciate the time spent by the parties involved in identifying the New Northern Route Alternative; that you will consider it as the preferred route.

Regards,  
Scott Diefenbach  
Central Washington Produce  
15000 RD 25 SW  
Mattawa WA 99349

---

Email sent using Atmail - Email, Groupware and Calendaring done right.

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:

Spokane District Records Manager

Attn: Vantage to Pomona Heights Supplemental Draft EIS

1103 North Fancher Road

Spokane, WA 99212

Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Vantage to Poona Heights SDEIS  
**Date:** Tuesday, February 17, 2015 1:35:10 PM  
**Attachments:** [Pac Pwr comments 2-16-15.docx](#)

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**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 1:32 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Vantage to Poona Heights SDEIS

FYI & For the Record

----- Forwarded message -----

**From:** **Judy Buermann** <[jkb1242@fairpoint.net](mailto:jkb1242@fairpoint.net)>  
**Date:** Tue, Feb 17, 2015 at 11:31 AM  
**Subject:** Vantage to Poona Heights SDEIS  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

Attached are my comments on the Vantage to Pomona Heights 230 kV Transmission Lines.  
Please be so kind as to acknowledge you have received them.

Thank you

Judy Buermann  
59-952-3591

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

RE: Vantage to Pomona Heights 230 kV Transmission Line Project  
Supplemental Draft Environmental Impact Statement

Date: February 16, 2015  
Ronald and Judith Buermann  
No organizational affiliation  
351 Sage Trail Road  
Yakima, WA 8901  
Email: [jkb1242@fairpoint.net](mailto:jkb1242@fairpoint.net)  
Phone: 509-952-3591

Resident/Property Owner

My comments to the Vantage to Pomona Heights 230 kV Transmission Line Project are:

1. Impact on our personal property, driveway and yard
2. Major concern about amount of traffic on Sage Trail Road and damage to road and bridge
3. Inadequate detail map
4. Location of 230 kV Transmission Lines behind 351 Sage Trail Road
5. NNR-1 and Shot Gun Lane

A

1. Our property at 351 Sage Trail Road is already impacted by the construction of power poles on Pacific Power's property directly above the Pomona Heights Substation. There are 6 poles being planted with more to come. We have heavy vehicles (not regular sized pick-ups) using our driveway and yard multiple times a day Saturday included. The private sub-contractors crews are always very polite. Your FAQ included in the packet says that Pacific Power ROW agents will contact the private land owners. We have not heard from them. It seems to us Pacific Power should of explained to us about the traffic. Our driveway is paved and was put in for regular vehicles, not heavy equipment. Our yard is chip rocked and that has been displaced due to the traffic of heavy vehicles. We don't believe there is even an easement on file to use our property in this manner. Will Pacific Power be required to repair the driveway should damage occur? Will they be required to replace displace rock on the yard? Shouldn't an agreement have been place before the construction began?

B

2. MAJOR CONCERN: Our property is located at 351 Sage Trail Road, the last house and property before & above the Pomona Heights Substation. To access the NNR-1a route Pacific Power and their sub-contractors have to use Sage Trail Road, a private, not county, road. The homeowners on Sage Trail Road have a single lane wooden bridge that crosses the Selah/Moxee canal. This bridge was constructed and maintained by the homeowners as well as the dirt road which is Sage Trail Road. We have a major concern

about heavy vehicle use of the bridge and road on a daily basis for the years during construction of the Pacific Power poles and 230 kV transmission line. This bridge was built for normal vehicle traffic, not heavy (5-10 ton or more) vehicles. If damage would occur the homeowners would have to replace the bridge as it is our only access to homes on Sage Trail Road. In reference to my first comment about current construction next to our property no one was prepared to even look at the bridge before they started construction. It was Ron Buermann that required the crews to look at the bridge and take pictures. What actions will be taken to ensure the bridge and road are kept in good condition?

- C 3. The map included in the packet is inadequate for homeowners to use to comment on. It is difficult to access the maps on computer and they are not very detailed. When I attended the meeting at the Civic Center in Selah they could not tell me where the poles are being located. This is a concern for the homeowners on Sage Trail Road with respect to views, etc.
- D 4. I understand the power poles for the 230 kV transmission line are going up behind my property at 351 Sage Trail Road. I would like to see them go as high up the hill as possible. I understand they can come within 200 feet of the existing 230 kV transmission lines. They then can go across the hill to the north and come down near the existing poles on Sage Trail Road. I own the property directly above my home and am amiable to having them go across the east most area of that property.
- E 5. It would seem the NNR-1 line should be directed down Shot Gun Lane right off Sage Trail Road. It would cut out a lot of mileage, save dollars and help with the problem of people's view being blocked.

Please feel free to contact me with any questions or for clarification

Judy Buermann  
509-952-3591

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United States Department of the Interior  
Bureau of Land Management  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801

Vantage to Pomona Heights 230 kV Transmission Line Project  
Supplemental Draft Environmental Impact Statement

OPEN HOUSE

Wednesday, January 28, 2015  
6:00 p.m. to 8:00 p.m.  
Sagebrush Senior Center  
441 Desert Aire Drive North  
Mattawa, Washington 99349

COMMENTS

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CHUCK FULLER

I'm with the airport group here, Desert  
Aire, and our concern is that the power lines don't  
come within our flight path, don't come close to our  
flight path. There's a glide path coming into our  
A airport that we have to worry about. The previous  
plan to go along the highway out here would have been  
very close to have been in our flight path, so we want  
to make sure that doesn't happen. we would like to  
see it over on the military operations over here  
myself. so that's my comment.

DOROTHY BOZORTH

I like the new route that goes over the  
river and around the northern. I live on the other  
side by Burkett Lake. we already have three. I have  
one on one side and two on the other side. we don't  
need any more on our side. I live on Lower Crab Creek  
Road out of Beverly, so. what else is there. That's  
pretty much it. I can't see if we put one more. I  
only have two acres. we're really tight there  
already.

1 ROBERT REED CHRISTENSEN

2  
3 We have property under this 3c, adjacent to  
4 it. And so the last time we had comments period, I  
5 made plenty of comments in relation to that. And our  
6 status hasn't changed. We are still very much against  
7 having it come down that way if we can somehow stop  
8 it, and would be very much in favor of going across  
9 the firing range. I think that's -- From the start, I  
10 thought that's what made sense. And they told us at  
11 that time that the Army just wasn't going to allow it.  
12 But the way they're talking out here now, apparently  
13 they have given in a little. And that's good news to  
14 us. We think that's where it should be.

15 One of my worries about putting it on 3C is the  
16 fact that it would interfere with aerial spraying of  
17 crops. There's already too many power lines in that  
18 area and it's difficult for pilots to fly around those  
19 power lines, and one more would be just about the  
20 straw that broke the camel's back.

21 And the other thing is, that I mentioned the last  
22 time, that our machinery keeps getting bigger,  
23 broader, and having those power lines along the edge  
24 of our fields, power poles is an obstacle that's hard  
25 for us a deal with because of the size of the

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equipment nowadays. The chances of accidents increase considerably. They wouldn't want us knocking their poles down. I'm highly in favor of the new proposal.

JAMES ECKENBERG

I prefer the north route, NNR-7 I believe is the new route, for the simple fact it makes common sense, being the roads are already there. And it's less impact to the public. The south route through the wahluke slope impacts the agriculture for the reasons of interfering with irrigation, interfering with crop dusting and adversely opposing homes. It goes over the top of a couple of houses.

So basically I prefer to go on a different route out of where it does economical harm. Just common sense says a shorter route is better. Paralleling the existing power line on the north route makes common sense. The infrastructure is already there.

(OPEN CONCLUDED AT 8:00 P.M.)

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C E R T I F I C A T E

STATE OF WASHINGTON) )  
COUNTY OF YAKIMA ) ss.

THIS IS TO CERTIFY that I, Dorene Boyle,  
Certified Court Reporter in and for the State of  
Washington, residing at Yakima, reported the within and  
foregoing statements; said statements being taken before me  
as a Certified Court Reporter on the date herein set forth;  
that said statements were taken by me in shorthand and  
thereafter under my supervision transcribed, and that same  
is a full, true and correct record of the statements of  
said participants.

I further certify that I am not a relative or  
employee or attorney or counsel of any of the parties, nor  
am I financially interested in the outcome of the cause.

IN WITNESS WHEREOF I have hereunto set my hand  
this \_\_\_\_ day of \_\_\_\_\_, 2015.

CERT/LIC NO. 2521 \_\_\_\_\_  
Certified Court Reporter in and for the  
State of Washington, residing at Yakima

THIS PAGE INTENTIONALLY LEFT BLANK.

**From:** [Dave Dean 6305](mailto:Dave Dean 6305)  
**To:** [Darrin Gilbert 6123](mailto:Darrin Gilbert 6123); [John Everingham 6244](mailto:John Everingham 6244); [Patsy Friend 6347](mailto:Patsy Friend 6347)  
**Cc:** [Cindy Lysne 6153](mailto:Cindy Lysne 6153)  
**Subject:** FW: Vantage to Pomona Heights Supplemental Draft EIS just questions  
**Date:** Tuesday, February 24, 2015 9:52:37 AM

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Monday, February 23, 2015 6:06 PM  
**To:** Dave Dean 6305; scott.taylor@pacificcorp.com  
**Cc:** Linda Coates-Markle; J Vacca; Cindy Lysne 6153  
**Subject:** Fwd: Vantage to Pomona Heights Supplemental Draft EIS just questions

Hello Dave & Scott:

Could you please work on a draft response to this email request for information.

Thanks & I'm back in the office late tomorrow afternoon or early Wednesday morning.

Thanks .....Robin

----- Forwarded message -----

**From:** Nancy <[chotthomewhereeaglesfly@gmail.com](mailto:chotthomewhereeaglesfly@gmail.com)>  
**Date:** Sun, Feb 22, 2015 at 12:52 PM  
**Subject:** Vantage to Pomona Heights Supplemental Draft EIS just questions  
**To:** [blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)

A Hello, I realize it's too late to give input but I can't tell by the maps if this "preferred" green line will go by our home or not. We live on the top of Yakima Ridge in the Yakima Ranches Private land just South of the Yakima Training Center. 1a and 1b is where my question lies. We live on Schade Street off Woodward West at the very top of the ridge. I saw some indication that part of the line may affect Sage Trail Road but I couldn't tell what section of it. We don't live on Sage Trail but I know it is near by. If you have a more detailed map of 1a and 1b that shows road names I'd appreciate seeing it. Thanks, Nancy Chott 701 Schade Street, Yakima, WA 98901

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:  
Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212

Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135

**From:** [Dave Dean 6305](#)  
**To:** [Patsy Friend 6347](#)  
**Cc:** [Cindy Lysne 6153](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Subject:** FW: FYI & For the Record FW: ECOLOGY COMMENTS: Vantage to Pomona Hts. 230kV Transmission Line SDEIS (L Coates-Markle)  
**Date:** Thursday, February 12, 2015 12:46:14 PM  
**Attachments:** [image003.png](#)  
[\(Coates-Markle, L\)E15-001.pdf](#)

---

DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**  
[www.powereng.com](http://www.powereng.com)

---

**From:** Roberta Estes [mailto:[restes@blm.gov](mailto:restes@blm.gov)]  
**Sent:** Thursday, February 12, 2015 10:52 AM  
**To:** Cindy Lysne 6153; Dave Dean 6305  
**Cc:** Linda Coates-Markle  
**Subject:** FYI & For the Record FW: ECOLOGY COMMENTS: Vantage to Pomona Hts. 230kV Transmission Line SDEIS (L Coates-Markle)

[FYI & For the Record.](#)

**From:** Coates-Markle, Linda [mailto:[lcmarkle@blm.gov](mailto:lcmarkle@blm.gov)]  
**Sent:** Thursday, February 12, 2015 8:56 AM  
**To:** Roberta Estes  
**Subject:** Fwd: ECOLOGY COMMENTS: Vantage to Pomona Hts. 230kV Transmission Line SDEIS (L Coates-Markle)

For V-P.....

Linda Coates-Markle

Wenatchee Field Manager

915 Walla Walla Ave.

Wenatchee, WA 98801

PH: 509-665-2101

FAX: 509-665-2121

Cell: 509-720-9510

Don't judge each day by the harvest you reap, but by the seeds that you plant.

Robert Louis Stevenson

----- Forwarded message -----

From: **Anderson, Cindy (ECY)** <[CYAN461@ecy.wa.gov](mailto:CYAN461@ecy.wa.gov)>

Date: Thu, Feb 12, 2015 at 8:09 AM

Subject: ECOLOGY COMMENTS: Vantage to Pomona Hts. 230kV Transmission Line SDEIS (L Coates-Markle)

To: "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>, Linda Coates-Markle <[lcmarkle@blm.gov](mailto:lcmarkle@blm.gov)>

Cc: "Costello, Terri (ECY)" <[TEMI461@ecy.wa.gov](mailto:TEMI461@ecy.wa.gov)>



Hello;

Ecology submits the attached comments. If you have any questions, please contact Terri Costello at 509-329-3550 or via email at [terri.costello@ecy.wa.gov](mailto:terri.costello@ecy.wa.gov).

Thank you.



**Cindy Anderson**

SEA Program Secretary/Eastern Regional Office | Dept. of Ecology | 509.329.3442 phone | 509.329.3529 fax  
Email: [Cindy.Anderson@ecy.wa.gov](mailto:Cindy.Anderson@ecy.wa.gov)



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**Cindy Anderson**

SEA Program Secretary/Eastern Regional Office | Dept. of Ecology | 509.329.3442 phone | 509.329.3529 fax

Email: [Cindy.Anderson@ecy.wa.gov](mailto:Cindy.Anderson@ecy.wa.gov)



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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

February 12, 2015

Ms. Linda Coates-Markle  
Field Manager  
Bureau of Land Management  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801

Re: Vantage to Pomona Hts. 230kV Transmission Line, File # DOI-BLM-OR-134-2013-0002-EIS

Dear Ms. Coates-Markle:

Thank you for the opportunity to comment on the Supplemental Draft Environmental Impact Statement regarding the proposed 41-mile new route of the Pacific Power transmission line to run through the U.S. Army's Yakima Training Center, parallel and north of the existing line (Proponent-Pacific Power). The Department of Ecology has reviewed the documents and submits the following comments:

Shorelands and Environmental Assistance Program-Wetlands

Based on National Wetland Inventory imagery and aerial photos, wetlands exist in the project vicinity. A wetland reconnaissance and/or delineation should be conducted, and the applicant must consider and mitigate for impacts to wetlands if the project will impact the wetland or wetland buffer (setback area).

A Impacts to wetlands or other waters of the state will require permitting from the Department of Ecology (401 Certification or Administrative Order) and may require permitting from the U.S. Army Corps of Engineers (Section 404). Please contact David Moore at (509) 329-3474 or at [dmoo461@ecy.wa.gov](mailto:dmoo461@ecy.wa.gov) for more information.

State Environmental Policy Act (SEPA)

Ecology's comments are based upon the information submitted for review. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

Sincerely,  
Cindy Anderson for:

Terri Costello  
SEPA Coordinator  
Phone: (509) 329-3550

Email: [temi461@ecy.wa.gov](mailto:temi461@ecy.wa.gov)

E15-001

**From:** [Dave Dean 6305](#)  
**To:** [Darrin Gilbert 6123](#); [John Everingham 6244](#); [Patsy Friend 6347](#)  
**Cc:** [Cindy Lysne 6153](#)  
**Subject:** FW: Pomona Heights 230kV Meeting  
**Date:** Friday, February 13, 2015 2:28:26 PM  
**Attachments:** [YN to BLM on meeting.pdf](#)

---

DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**

[www.powereng.com](http://www.powereng.com)

---

**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Friday, February 13, 2015 2:18 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** J Vacca; Richard Bailey; Linda Coates-Markle; Sandra Gourdin  
**Subject:** Fwd: Pomona Heights 230kV Meeting

FYI & For the Record

----- Forwarded message -----

**From:** **Brady Kent** <[BKent@yakama.com](mailto:BKent@yakama.com)>  
**Date:** Thu, Jan 29, 2015 at 2:39 PM  
**Subject:** Pomona Heights 230kV Meeting  
**To:** Jessica Lally <[jessica@yakama.com](mailto:jessica@yakama.com)>, Johnson Meninick <[johnson@yakama.com](mailto:johnson@yakama.com)>, Mark Nuetzmann <[mnuetzmann@yakama.com](mailto:mnuetzmann@yakama.com)>, "Leroy Adams Jr." <[kawichin@yakama.com](mailto:kawichin@yakama.com)>, "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>, Phil Rigdon <[prigdon@yakama.com](mailto:prigdon@yakama.com)>  
**Cc:** Elizabeth Sanchez <[esanchez@yakama.com](mailto:esanchez@yakama.com)>

Good Afternoon,

Attached is the letter being sent to BLM requesting a meeting between Yakama Nation and BLM regarding the Pomona Heights Transmission project. A hard copy will follow.

*Brady Kent*  
*Environmental Review Coordinator*  
*Yakama Nation Environmental Management Program*  
*P.O. Box 151*  
*Toppenish, WA 98948*  
*Office: (509) 865-5121 ext. 6074*

*Fax: (509) 865-2496*

*Cell: (206) 458-9975*

*email: [bkent@yakama.com](mailto:bkent@yakama.com)*

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:

Spokane District Records Manager

Attn: Vantage to Pomona Heights Supplemental Draft EIS

1103 North Fancher Road

Spokane, WA 99212

Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728

J.A. Vacca, Wildlife Biologist (509) 665-2135



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

January 29, 2015

Rich Bailey  
District Archeologist, Spokane District  
United States Department of the Interior  
Bureau of Land Management  
915 Walla Walla Avenue  
Wenatchee, WA 98801

### **Request Staff Meeting Regarding Vantage to Pomona Heights 230 kV Transmission Project**

Dear Mr. Bailey:

The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) received a letter from the United States Department of the Interior, Bureau of Land Management (DOI-BLM) in regards to the Supplemental Draft Environmental Impact Statement (SDEIS) for the Vantage to Pomona Heights 230kV Transmission Project. The project lies within the ancestral lands and Treaty Reserved Area of the Yakama Nation. As such, the Yakama Nation has a considerable interest in how the lands are managed to protect cultural resources and values.

The Yakama Nation Reserved rights in its treaty with the United States signed in 1855 and ratified by Congress in 1859 (12 Stat 951). The Treaty set forth that Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources. You must seek consultation with the Yakama Nation's sovereign government before undertaking any action that might adversely impact the Yakamas' ceded territories and the rights reserved to the Yakamas on those lands.

A

Upon review of the proposed project, the Yakama Nation does have concerns with potential impacts and regulatory issues on or near the property. Due to the long period of idleness and resumption of the SDEIS, we are requesting a staff-to-staff meeting between Yakama Nation and the DOI-BLM Spokane District. This will allow for updates, proposed actions and a general discussion. It is the policy of the Yakama Nation to preserve, protect, and perpetuate all significant natural and cultural resources. Only the Yakama Nation can determine what is significant to our Tribe.

Please contact Brady Kent at (509) 865-5121 x6074 to arrange this meeting. If you have any questions or comments Mr. Kent will be able to assist you.

Sincerely,

Phil Rigdon, Deputy Director  
Department of Natural Resources  
Yakama Nation

Post Office Box 151, Fort Road, Toppenish, WA 98948 (509) 865-5121

cc: Johnson Meninick, YN Cultural Resources Manager  
Jessica Lally, YN Cultural Archaeologist  
LeRoy Adams, YN Wildlife Manager  
Mark Nuetzmann, YN Wildlife Biologist  
Brady Kent, YN Environmental Review Coordinator

**From:** [Dave Dean 6305](#)  
**To:** [Darrin Gilbert 6123](#); [John Everingham 6244](#); [Patsy Friend 6347](#)  
**Cc:** [Cindy Lysne 6153](#)  
**Subject:** FW: DNR Comment letter on SDEIS  
**Date:** Friday, February 13, 2015 2:31:14 PM  
**Attachments:** [dnr\\_sdeis\\_comment.pdf](#)

---

DAVE DEAN  
BIOLOGY BUSINESS UNIT DIRECTOR  
208-288-6305  
208-608-3191 cell

**POWER Engineers, Inc.**

[www.powereng.com](http://www.powereng.com)

---

**From:** [restes@blm.gov](mailto:restes@blm.gov) [mailto:[restes@blm.gov](mailto:restes@blm.gov)] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Friday, February 13, 2015 2:07 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: DNR Comment letter on SDEIS

FYI & For the Record

----- Forwarded message -----

**From:** **Goss, Rochelle (DNR)** <[rochelle.goss@dnr.wa.gov](mailto:rochelle.goss@dnr.wa.gov)>  
**Date:** Thu, Feb 12, 2015 at 4:23 PM  
**Subject:** DNR Comment letter on SDEIS  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>

Please accept the attached comments from the Department of Natural Resources on the Vantage to Pomona Heights 230kV Transmission Line.

Thank you,

**Rochelle M. Goss**  
External Affairs Program Lead  
Department of Natural Resources  
360-902-2117  
[sepacenter@dnr.wa.gov](mailto:sepacenter@dnr.wa.gov)

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:

Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:  
Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135



PETER GOLDMARK  
*Commissioner of Public Lands*

February 12, 2015

Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801  
[Blm\\_or\\_vantage\\_pomona@blm.gov](mailto:Blm_or_vantage_pomona@blm.gov)

SUBJECT: Vantage to Pomona Heights 230 kV Transmission Project DOI-BLM-OR-134-2013-0002-EIS

Dear Sirs,

Thank you for the opportunity to comment on the Vantage to Pomona Heights 230 kV Transmission Project Supplemental Draft EIS. The Washington State Department of Natural Resources comments are on the following pages in table format by section of the document. In general, we would like to recognize that the overall treatment of sensitive species is reasonably thorough and that reasonable and practical measure to avoid impacts have been identified. The compilers of the supplementary draft EIS are to be commended for this.

The Department of Natural Resources' focus for these comments is on Aquatics issues as related to crossing DNR-managed State-Owned Aquatic Lands, Natural Areas consideration, and Natural Heritage comments with regard to rare plant data.

If you have any questions, please contact me at (360) 902-2117 or [Rochelle.goss@dnr.wa.gov](mailto:Rochelle.goss@dnr.wa.gov).

Sincerely,

Rochelle M. Goss  
External Affairs Program Lead  
Environmental & Legal Affairs Section  
Department of Natural Resources

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative  
 Chapter 4 – Affected Environment – Department of Natural Resources Comments**

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
4.1						
4.2	4-5	Vegetation	DNR (John Gamon)	<p>“The WNHP GIS occurrence polygons include large buffers, so it is uncertain if the occurrences actually intersect with areas of impact from the proposed Project. For the purposes of this analysis, the assumption is made that the entire mapped area is occupied by the species. The WNHP does not disclose special status plant occurrence information for private lands due to privacy laws. Therefore, without surveys on private lands, there is no way to disclose what effects this</p>	<p>Some of our data does <u>include buffers, but various versions of the data are available that improve the locational precision.</u> Additionally, <u>WNHP shared data does generally include records on private lands, where those private lands have been inventoried and the information has been shared with us. We would be glad to work with the appropriate agency and/or consulting firm staff to ensure that WNHP data are used and interpreted appropriately so that it can better contribute to the analysis of this project.</u></p>	A

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative  
 Chapter 4 – Affected Environment – Department of Natural Resources Comments**

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
				Project may have on special status plants on private land.”		
<b>4.3</b>						
<b>4.4</b>						
<b>4.5</b>						
<b>4.6</b>						
<b>4.7</b>						
<b>4.8</b>						
<b>4.9</b>						
<b>4.10</b>						

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative  
 Chapter 4 – Affected Environment – Department of Natural Resources Comments**

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
4.11						
4.12						
4.13						
4.14	Pg 4-215 Section 4.14.1.3 Entire Section	Water Resources (Impact Types)	Department of Natural Resources- Aquatics Division  (Brandon Kingsbury, Aquatics Easement Specialist, Rivers District)	“Construction could require the removal of riparian vegetation, and/or the placement of temporary fill. Other impacts could include accidental spills of environmentally harmful materials, increased sedimentation, and contamination of water resources from construction related disturbance...”	<u>Comment: If temporary construction impacts State Owned Aquatic Land, DNR will require a separate use authorization known as a Right of Entry (ROE). A Right of Entry is a temporary agreement allowing placement of improvements for construction purposes only. Prior to expiration of the ROE’s term all improvements must be removed from State Owned Aquatic Lands. NNR-8 proposes to cross State Owned Aquatic Land and may require a ROE.</u>  <u>Additionally, as part of the ROE, potential encroachment</u>	B

**Vantage-Pomona Heights 230kV Transmission Line  
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 Chapter 4 – Affected Environment – Department of Natural Resources Comments**

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
					<u>on the litoral and near shore environment may impact aquatic species and associated habitat. These impacts may require Habitat Stewardship Review and measures as part of the condition of the temporary agreement.</u>	B
<b>4.14</b>						
<b>4.15</b>						
<b>4.16</b>						
<b>4.17</b>						
<b>General Comment about the cumulative impacts discussion</b>	Entire section		Department of Natural Resources - Natural Areas Program (Curt Pavola, Natural Areas Program Manager)	Existing text in part measures project impacts against the scale of past and likely future projects. This diminishes the potential impacts on site-specific rare features that are avoidance areas for direct project impacts	<u>The cumulative impacts discussion should analyze and specifically reference impacts and future management requirements for Washington DNR natural area preserves in the project area. The maps in Figure 4. 7-2 and Figure 4. 17-1 (and similar) should show</u>	C

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative  
 Chapter 4 – Affected Environment – Department of Natural Resources Comments**

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
				<p>but which are particularly vulnerable to cumulative impacts at a finer scale than recognized in the current draft text.</p> <p>See the comments below for specifics.</p>	<p><u>Washington DNR natural area preserves as distinct from Washington DNR state trust lands. DNR-managed natural area preserves (NAPs) are irreplaceable and contain rare, threatened or endangered flora and fauna. The uniqueness of NAPs require additional care to protect sensitive species.</u></p> <p><u>In addition to avoidance of specific locations of rare features or timing for avoidance of wildlife impacts, the project proponent must pre-plan with the DNR Natural Areas Program any actions on DNR-owned and managed natural areas; and mitigate as needed.</u></p>	C
4.17.6	Page 4-289 and Page 4-290	Cumulative Effects Analysis	Department of Natural Resources . Natural Heritage Program (John Gamon Natural Heritage	<p>Page 4-289 Statement: “The proposed Project will not substantially contribute to cumulative impacts...”</p> <p>And many references on Pages 4-289 and 4-290.</p>	<p><u>Statement is not supported. Revise cumulative impacts analysis section. Citation: Natural Area Preserves Act - RCW 79.70. 1. Even if construction of a new line(s) across the canyon are east of the NAP on the west side of</u></p>	D

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative**  
 Chapter 4 – Affected Environment – **Department of Natural Resources** Comments

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
			Program Manager)		<p><u>Interstate 82, they remain within the boundary of Selah Cliffs NAP (“lands eligible for inclusion in the NAP”) due to habitat values on those lands. Also, any construction access through the NAP for construction or staging will have impacts, both short-term and potentially cumulative and permanent. Maintenance access for any towers or poles located on the valley floor or lower slopes will cause similar impacts. Concerns with access through the NAP include spread of weeds, disturbance of wildlife, and potential interference with visitors at the interpretive (environmental education) trail.</u></p> <p>2. <u>It appears that the proposed line would go over a portion of cliff face (on the south side of the canyon) that may harbor basalt daisy (Erigeron basalticus). Construction</u></p>	D

Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative  
 Chapter 4 – Affected Environment – Department of Natural Resources Comments

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
					<p>activities may pose a risk directly to the cliff face. <u>No materials should be cast over the top of the cliff.</u></p> <p>3. <u>The cliff is also a nesting location for prairie falcon (Falco mexicanus), a Washington State Department of Fish and Wildlife state-listed “monitor” wildlife species. Construction and access footprints should avoid known nesting locations. Construction and maintenance activities should be avoided during the nesting season.</u></p> <p>4. <u>Any construction activities will lead to increased exposed ground which, in this landscape, will lead to an increase in weeds. Ongoing weed control of disturbed areas within the natural area preserve boundary will need to be mitigated, and it may increase site management costs for the DNR Natural Areas Program to manage</u></p>	D

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative  
 Chapter 4 – Affected Environment – Department of Natural Resources Comments**

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
					<u>Selah Cliffs Natural Area Preserve.</u>	D
4.17.6	Page 4-289 and Page 4-290	Cumulative Effects Analysis	Washington Department of Natural Resources - Natural Heritage Program (John Gamon)	Page 4-289 Statement: “The proposed Project will not substantially contribute to cumulative impacts.”  And references to wildlife	Statement is not supported. <u>Revise cumulative impacts analysis section.</u> <u>Citation: Natural Area Preserves Act - RCW 79.70; and State of Washington fish and wildlife statutes.</u> <u>1. The Vantage Substation is nested within the area that has been recommended by the State of Washington Natural Heritage Advisory Council (and the DNR Natural Heritage Program) as a future natural area preserve (NAP).</u> <u>2. Proposed power lines approaching the substation go through areas that appear to be suitable habitat for the striped whipsnake (Masticophis taeniatus), a Washington State Department of Fish and Wildlife state-listed “candidate” wildlife species. This area is the</u>	E

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative**  
 Chapter 4 – Affected Environment – **Department of Natural Resources** Comments

Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
					<p><u>only known extant site for this species in Washington. Proposed power lines approaching the substation go very near, and perhaps through, a site for annual sandwort (Minuartia pusilla), a state-listed “sensitive” plant species. There are seven known occurrences in Washington, but the occurrence near the Vantage Substation is the only recent one; all others are older and considered historical and are not considered extant.</u></p>	E
<b>4.20</b>						
<b>Appendix B-3</b>						
<b>Appendix B-4</b>						

**Vantage-Pomona Heights 230kV Transmission Line  
 Supplemental Draft Environmental Impact Statement. New Northern Alternative**  
 Chapter 4 – Affected Environment – **Department of Natural Resources** Comments

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Section #	Page number & Line Number	Category (e.g., Alternatives, Impacts)	Agency (and commenter)	Existing Text	Comment/Suggested Revision	Response
Appendix C-4						

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**From:** [Cindy Lysne 6153](#)  
**To:** [Patsy Friend 6347](#); [Darrin Gilbert 6123](#); [John Everingham 6244](#)  
**Cc:** [Dave Dean 6305](#)  
**Subject:** FW: Potential Impacts - Vantage - Pomona Heights 230kV Transmission Line Project (Yakima County Franchise)  
**Date:** Tuesday, February 17, 2015 1:11:48 PM  
**Attachments:** [YCPS Franchise Application \(Revised 7-31-12\).pdf](#)  
[Definition of a Franchise.doc](#)

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**From:** restes@blm.gov [mailto:restes@blm.gov] **On Behalf Of** Vantage\_Pomona, BLM\_OR  
**Sent:** Tuesday, February 17, 2015 1:07 PM  
**To:** Dave Dean 6305; Cindy Lysne 6153  
**Cc:** Linda Coates-Markle; J Vacca; Sandra Gourdin  
**Subject:** Fwd: Potential Impacts - Vantage - Pomona Heights 230kV Transmission Line Project (Yakima County Franchise)

FYI & For the Record

----- Forwarded message -----

**From:** Alan Adolf <[alan.adolf@co.yakima.wa.us](mailto:alan.adolf@co.yakima.wa.us)>  
**Date:** Tue, Feb 17, 2015 at 9:11 AM  
**Subject:** Potential Impacts - Vantage - Pomona Heights 230kV Transmission Line Project (Yakima County Franchise)  
**To:** "[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)" <[blm\\_or\\_vantage\\_pomona@blm.gov](mailto:blm_or_vantage_pomona@blm.gov)>  
**Cc:** Byron Gumz <[Byron.Gumz@co.yakima.wa.us](mailto:Byron.Gumz@co.yakima.wa.us)>

***Vantage to Pomona Heights Supplemental Draft EIS Project Manager:***

*“In accordance with Chapter 36.55 of the Revised Code of Washington (RCW), Yakima County maintains legal authority to grant franchises to interested parties. A franchise is an agreement of understanding between an authorized jurisdiction (Yakima County), and a prospective applicant that defines the rights and responsibilities of both the county and the individual or business in placing utilities in county right-of-way. The franchise sets forth the conditions of placement. The approving of a franchise shall be done only by a resolution of the Board of Yakima County Commissioners and only after a Public Hearing on the matter is held by the Board in the manner prescribed in RCW 36.55. “*

Yakima County Public Services Roads Department will require the completion of Franchise Application (Attached) for the crossing of various “Yakima County Rights of Way” (ROW) within the projected service area of the revised “Pomona Heights 230kV Transmission Line Project” within the boundaries of Yakima County.

A

Yakima County projects potential crossing(s) of roads including (but not limited to) : Corriedale Road, E. Pomona Road, Pomona Heights, Schlagel Road, Firing Center Road and Tipp Road. Yakima County will request a “System-Side” franchise (rather than individual franchises for each crossing of Yakima County roadways and rights of way) to streamline the franchise process and eliminate unnecessary repetition. A system-wide franchise would provide a 20-year approval for the applicant to utilize Yakima County ROW to place the transmission line “in, along, over, or under” county ROW .

The Yakima County Franchise coordinator has **NO** specific concerns regarding the proposed alignment(s) of the transmission line pending the use of approved local, state, and federal installation practices as long as all work is performed within the stated service area of the project.

The public hearing would be held within 3-5 weeks following submittal of your Franchise Application (pending available hearing scheduling). There is no permit cost preceding the public hearing, however, a bill for the public hearing notices in the Yakima Herald Republic will be sent for payment to the applicant prior to final issuing of the franchise.

Any further questions regarding franchise forwarded to the Franchise Coordinator

*Alan Adolf*

Sr. Transportation / Project Planner  
Yakima County Public Services  
128 N. 2nd Street, 4th Floor  
Courthouse  
Yakima, WA 98901  
(509) 574-2344

--

Spokane District, Bureau of Land Management  
Wenatchee Field Office

Mail To:

Spokane District Records Manager  
Attn: Vantage to Pomona Heights Supplemental Draft EIS  
1103 North Fancher Road  
Spokane, WA 99212  
Fax: 509-536-1275

[Project Website](#)

Points of Contact:

Robin Estes, Project Lead (541) 416-6728  
J.A. Vacca, Wildlife Biologist (509) 665-2135



# FRANCHISE APPLICATION

## County Roads

Yakima County Public Services  
128 North Second Street · Fourth Floor Courthouse · Yakima, Washington 98901  
(509) 574-2300 · 1-800 572-7354 · FAX (509) 574-2301 · [www.co.yakima.wa.us](http://www.co.yakima.wa.us)

Form # CR0007A Revised 07/31/12
BOCC Office Use Only
FRANCHISE # _____
DATE _____

### Applicant (Owner of parcel(s) seeking franchise):

Name/Business \_\_\_\_\_  
Address \_\_\_\_\_  
City/State/Zip \_\_\_\_\_  
Phone No. \_\_\_\_\_  
E-Mail (optional) \_\_\_\_\_

### Project Info (Completed by Applicant)

Affected Parcel # 1 \_\_\_\_\_  
Affected Parcel # 2 \_\_\_\_\_  
Affected Parcel # 3 \_\_\_\_\_  
Affected Parcel # 4 \_\_\_\_\_  
(if more, use separate sheet)

### Franchise Use

\_\_\_\_\_ Water (Residential)      \_\_\_\_\_ Water (Irrigation)  
\_\_\_\_\_ Sewer (Residential)      \_\_\_\_\_ Liquefied Animal Waste  
\_\_\_\_\_ Oil / Petroleum      \_\_\_\_\_ Natural Gas  
\_\_\_\_\_ Fiber Optic (Aerial)      \_\_\_\_\_ Fiber Optic (In-ground)  
\_\_\_\_\_ Electrical (Aerial)      \_\_\_\_\_ Electrical (In-ground)  
\_\_\_\_\_ Other (Specify) \_\_\_\_\_

### Construction Method to be Utilized

\_\_\_\_\_ Boring Under Roadway  
\_\_\_\_\_ Trench Across Roadway  
\_\_\_\_\_ Plowing Along Side of Roadway  
\_\_\_\_\_ Aerial / Poles  
\_\_\_\_\_ Other If so, How? \_\_\_\_\_

### Does work cross:

\_\_\_\_\_ Bridge  
\_\_\_\_\_ Culvert  
\_\_\_\_\_ Tunnel or Underpass

### Franchise Conditions

- A) Revised Code of Washington – 36.55.010 to 36.55.080
- B) Washington Administrative Code – 136.40.030
- C) Yakima County Resolution No. 172-1993

### Instructions (Please Read)

- OWNERS MUST SIGN YOUR APPLICATION (Below).** Please print information clearly and neatly.
- Include an Aerial Photo, Site Map, or Traffic Control Plan showing location of proposed utility crossing.
- For all new construction, fill out the **Right-of-Way Use** Permit Application. The **Right of Way Use** Permit will not be approved until after your franchise has been granted.
- Franchises are requested when an individual or business needs to place utilities in the county right-of-way; the franchise sets forth the condition of placement. The request for a franchise shall be made on the Application for Yakima County Franchise Form.
- Return (mail, fax, email, or in person) the completed and signed application to: Board of County Commissioners (BoCC) – 128 North 2<sup>nd</sup> Street, Room 232, Yakima, Washington 98901; Fax No. 509-574-2301, attention Franchise Coordinator.

Upon receipt, the application will be stamped, logged, and assigned a franchise number. The application is then processed by the Public Services Department, who will initiate the process to set the public hearing date. Two public notices are required to be published 10 days apart. After the hearing, a resolution granting the franchise or dismissing the application will be on the following week's agenda. Agenda takes place at Yakima City Hall Council Chambers, 129 North 2<sup>nd</sup> Street at a time provide by the clerk of the BoCC. The franchise may be issued at the signing of the resolution. The franchise process takes approximately six weeks. There will be a fee assessed following the public hearing for publishing the notice.

### Description of Work (Completed by Applicant)

(Name road location(s), where work is to be performed, approximate distances to nearby intersection, etc.)

ROAD NAME (S): \_\_\_\_\_  
TYPE of WORK: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Type of Construction Materials Used

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Application Information (For County Use Only)

<u>Road Classification</u>	<u>Franchise Status</u>
_____ Principle Arterial (Urban)	_____ Existing
_____ Minor Arterial	_____ Proposed
_____ Collector Arterial	_____ Renewal
_____ Urban Access	
_____ Major Collector (Rural)	<u>Mile Point / Road Width</u>
_____ Minor Collector	_____
_____ Collector Arterial	_____
_____ Rural Access	
<u>Surface Type</u>	<u>Property Type</u>
_____ Asphalt	_____ Agriculture
_____ Concrete	_____ Commercial
_____ Gravel	_____ Residential
_____ Light Bituminous	_____ Other (Specify)
_____ Other _____	_____
<u>Direction from Intersection</u>	<u>Originating Side of Road</u>
[ ] N _____	[ ] N _____
[ ] S _____	[ ] S _____
[ ] E _____	[ ] E _____
[ ] W _____	[ ] W _____

Additional Notes:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I, \_\_\_\_\_, hereby affirm this information to be accurate: \_\_\_\_\_  
(Print Owner's Name) (Owner's Signature) (Date)

### **Definition of a Franchise**

In accordance with Chapter 36.55 of the Revised Code of Washington (RCW), Yakima County maintains legal authority to grant franchises to interested parties. A franchise is an agreement of understanding between an authorized jurisdiction (Yakima County), and a prospective applicant that defines the rights and responsibilities of both the county and the individual or business in placing utilities in county right-of-way. The franchise sets for the conditions of placement. For more information on franchises, review the Revised Code of Washington Chapter 36.55.010 to .080

### **Applying for a Franchise**

A franchise is requested when an individual or business needs to place utilities in county right-of-way. An applicant may obtain a Franchise Application Form by visiting the Yakima County Public Services Office, by mail, or by facsimile. Call (509) 574-2300 and ask for the Franchise Coordinator.

### **Processing the Application**

Upon receipt of the completed Franchise Application Form:

- 1) The Clerk of the BoCC sets a public hearing date within 3-5 weeks (the date of the public hearing is determined by a 15-day public notification period, where the last notification must be posted at least five days prior to the public hearing date).
- 2) Notification letter(s) are sent to the applicant notifying them of the public hearing date. Public Hearings are normally scheduled on Tuesdays at 10:30 a.m. following the BoCC's weekly Regular Agenda Meetings. However, times and dates can change at the discretion of the BoCC.
- 3) If approved, the Franchise Coordinator will submit a request resolution officially granting a franchise to the applicant. This resolution granting the franchise is usually approved by the BoCC at the next regularly scheduled Agenda Meeting
- 4) The Yakima County Auditor will bill the applicant the cost of the Public Notice (approximately \$120). This bill must be paid before the franchise will be issued.

### **Right of Way Use Permits**

Where the Franchise Permit grants the applicant access to county right-of-way, a Right-of-Way Use Permit documents "HOW" the work will be performed.

The applicant can begin the Right-of-Way Use (RWU) Permit process at the same time as the franchise request, however, a RWU Permit will not be approved without a granted franchise. The applicant is required to submit a completed RWU Information Form and an approved traffic control plan for review by county staff. This permit request will be reviewed for location and construction specific information. Upon staff approval of the RWU Permit, traffic control plan, and granting of franchise, a Right-of-Way Use Permit will be issued.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

RECEIVED

FEB 18 2015  
Bureau of Land Management  
WFO, Wenatchee, WA  
OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

February 17, 2015

Linda Coates-Markle  
Field Manager  
Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

Re: Comments on the Draft Supplemental EIS for Vantage to Pomona Heights Transmission Line Project (EPA Project Number: 10-002-BLM).

Dear Ms. Coates-Markle:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed **Vantage to Pomona Heights Transmission Line Project** in Grant, Brenton, Kittitas, and Yakima Counties, Washington.

The DSEIS analyzes potential environmental impacts associated with a new alternative route for the project (i.e., the New Northern Route (NNR)), developed after completion of the draft EIS for the project. Development of the new route took into consideration the inputs received from the public in February 2013, as well as the electrical regulating authority's revised transmission line separation distance requirements. While the longest portion of the NNR would be on the U.S. Department of the Army Joint Base Lewis-McChord Yakima Training Center (JBLM YTC), the new route would still run from the existing Bonneville Power Administration substation in Vantage, Grant County to Pacific Power's Pomona Heights substation in Selah, Yakima County, and cross federal, state, and private lands. The NNR would be about 41 or 48 miles long (with the Manastash Ridge subroute) and include two design options (overhead and underground) and the Manastash Ridge subroute variations (p. 2-3). Project activities under the NNR would remain the same as described for other Alternatives in the DEIS, with the exception of underground design option that would require construction activities, such as open cut trenching and horizontal directional drilling.

For the impacts analysis, the Bureau of Land Management considered three alternatives: the NNR and its components, the Preferred Alternative from the previous DEIS (Alternative D), and a No Action Alternative (p. 2-1). The DSEIS does not identify a preferred alternative. Based on comments received on this DSEIS and the DEIS, BLM will select its new Preferred Alternative. At the conclusion of the NEPA process, BLM and the Cooperating Agencies will decide to approve, approve with conditions or modifications, or deny Pacific Power (the Applicant) a Right-Of-Way to construct, operate, and maintain the proposed project facilities.

In our comments on the draft EIS in February 2013, we expressed concerns about the proposed project due to potential impacts to water quality, land use and farmlands, vegetation and wildlife, and cultural resources. While we recognize the addition of a new alternative in this DSEIS, we retain concerns articulated in our previous letter and expect the final EIS for the project will include adequate measures to protect and conserve resources in the analysis area.

The EPA appreciates BLM's efforts to consider public comments, and add the NNR to the project alternative actions in this supplemental EIS. Overall, the NNR would be shorter in length and be associated with fewer impacts on most resources in the project area when compared to the DEIS Preferred Alternative (p. 2-79). In particular, we are pleased to see that the NNR would result in virtually no impacts to agricultural land uses, water resources, wetlands, or air quality; and would result in the least amount of wildlife habitat disturbance, access road construction, and disturbance to cultural resources. However, we do have some concerns about potential impacts that the NNR may have on sage-grouse, habitat, geology and soils. We also have concerns regarding the climate change effects analysis.

A The DSEIS indicates that the majority of the proposed NNR would be located within Priority Areas for Sage-Grouse Conservation and, therefore, would result in the greatest sage-grouse habitat loss (115 acres) (p. 4-84). We recommend that BLM continue to coordinate with the U.S. Fish and Wildlife Service and National Marine Fisheries Service and/or Washington State Department of Fish and Wildlife, as appropriate to address this and other potential impacts to species and fisheries. The final EIS should include relevant information developed as a result of this coordination with these agencies, particularly outcomes of consultations with the Services and recommended measures to protect species.

C The DSEIS indicates that electric transmission service could be at risk of disruption as a result of seismic activity or landslides, particularly under the underground design option due to the difficulty or inability to span discovered faults (14 under the NNR compared to 2 under the DEIS Preferred Alternative (p. 4-241)). The NNR route would cross more than 2 miles of high landslide areas and excavate large volumes of soil (up to 215,000 cubic yards of soil/bedrock). There would be open cut trenching activities in highly erosive soils in areas with low restoration potential (p. 3-230). Because of concerns about these geologic and soil impacts associated with the proposed NNR, we support BLM's plan to conduct a more comprehensive geotechnical investigation of the analysis area (p. 4-242). The final EIS should include results of the geotechnical investigation, information on how seismicity was evaluated, and how the project was modified to reduce risks.

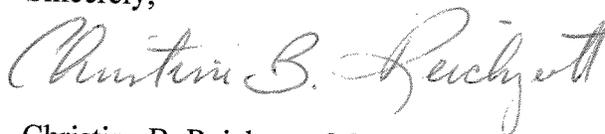
Regarding climate change effects, the DSEIS states that impacts to global climate change associated with implementation of the proposed project cannot be determined because established mechanisms to accurately predict the effect of resource management-level decisions do not exist, and that because the proposed project would result in minimal long-term emissions of greenhouse gases (GHGs), the long term impacts would not be considered adverse (p. 4-214).

B Consistent with the Council on Environmental Quality's recent "Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts" [1], we recommend that the Final EIS include an estimate of greenhouse gas (GHG) emissions associated with the proposal, and a discussion of practicable mitigation to reduce the emissions. We also recommend that BLM consider the approaches for climate impact assessment outlined in the revised draft guidance and include relevant information in the Final EIS.

Based on concerns discussed above and recommendations for additional information, we are assigning a rating of EC-2 (Environmental Concerns – Insufficient information) to this DSEIS. A copy of the rating system used in conducting our review is enclosed for your reference.

We appreciate the opportunity to review this DSEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure:

1. EPA Rating System for Draft Environmental Impact Statements

[1] <http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.



State of Washington  
**Department of Fish and Wildlife**

South Central Regional Office: 1701 South 24<sup>th</sup> Avenue Yakima, WA 98902-5720 (509 575-2740)

February 17, 2015

Linda Coates-Markle  
Field Manager  
Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1520

**Re: Comments on Draft Supplemental Draft Environmental Impact Statement  
for the Vantage to Pomona Heights 230Kv Transmission Project.**

Dear Linda:

WDFW appreciates the opportunity to comment on the Vantage to Pomona Heights 230 kV transmission line. The area where the project is proposed sits at the heart of the remaining shrub-steppe in Washington State. It supports one of two last remaining greater sage-grouse (*Centrocercus urophasianus*) populations in Washington. Our earliest correspondence to Pacific Power on this proposal, prior even to project scoping occurred in December 2008. We have remained consistent with that early correspondence. In these comments on the Supplemental Draft Environmental Impact Statement (SDEIS), we are incorporating our abiding concerns as well as comments on new issues that have arisen during project review. We look forward to working with the BLM to craft solutions to this challenging development proposal.

**Reasonable Range of Alternatives – No Alternative Outside of Priority Areas of Conservation (PAC) for Sage-Grouse.**

The proposed Vantage to Pomona Heights Transmission Line alternatives, including the alternatives in the SDEIS are all located for a significant portion of their length within a greater sage-grouse (PAC). The length of transmission line within the PAC ranges from 38 to 43 miles of line depending on the alternative. A PAC is a priority area of conservation. PACs were designated within the Conservation Objectives Team or COT

Report. The COT Report is a collaborative effort between the United States Fish and Wildlife Service (USFWS) and representatives with sage-grouse expertise from the various western states within the range of the sage-grouse. The goals of the COT Report are to identify locations for protection (the PACs) and identify a list of actions to engage in and refrain from, in order to conserve sage grouse and avoid the need for an Endangered Species Act listing of the greater sage-grouse.

In other states within the range of the greater sage-grouse, larger areas were identified and mapped as PACs. Avoiding a PAC in those other states could prove more challenging since mapped areas are spatially more extensive and more broadly distributed. In stark contrast, Washington State has a few small areas mapped as PACs due to the limited sage-grouse population and distribution, and limited suitable habitat. Another consideration is the proportion of Washington's PACs that would be impacted compared to other states. A PAC is essential habitat needed to help prevent further decline, a federal listing and possible extirpation of the sage-grouse.

A

Considerable latitude exists for siting a transmission line. No similar latitude exists with respect to the key locations for sage-grouse, such as a PAC. The sage-grouse population has retracted to these places and they are the last of the suitable habitats that support them. Selecting a PAC for placement of new infrastructure such as a transmission line when transmission lines have been shown to have deleterious impacts on sage-grouse is not reasonable or prudent. It is reasonable to re-direct the route of the project. No alternatives are located outside of the PAC, consequently, the alternatives provided do not represent a reasonable range of alternatives.

### **Design Life of Existing Line and Project Justification**

Utilizing the existing transmission line as justification and mitigation for co-locating the proposed new transmission line is highly problematic. Projects have a design life. The existing line that has been incorporated into the New Northern Route alternative will be approaching 50 years old when the proposed new line would be constructed next to it. The existing transmission line was constructed at an earlier time with little consideration for its impacts, and this old action should not set permanent baseline for all future actions. In essence, this is what is being proposed in the SDEIS. For example, if an addition is proposed for a century old house, the builder constructing the new addition would have to incorporate the latest building codes and techniques, and not rely on the old standards in place a century ago. Further, if the old house was no longer structurally sound, relying on the old structure to attach the addition to is a deeply flawed prospect. This is analogous to what is being proposed in the SDEIS. The existence of the old line is the justification for the location of the new line, yet the old line will be approaching 50 years old when the new line construction would be finalized.

B

Based on our experience with this proposal, we are persuaded that the existence of the new transmission line as envisioned in the new northern route alternative, would then be used to justify the replacement location of the old line. This circular justification

B frustrates analysis. If the existence of the old line is justification for the new route, the design life and impacts of that route should be available for analysis at the same time. To date, we have not been permitted a thorough discussion of the old line. This piecemeal treatment is contrary to the National Environmental Policy Act (NEPA). The two lines are interdependent and interrelated and one forms the justification for the other. The inadequacy of the existing line with respect to the electrical grid, is the basis and the justification for the new line. The route of the old existing line serves as justification for the route selection of the new line. Ownership and operation of the two lines are inextricably linked. These two lines are interdependent interrelated elements of a single proposal. This selective partitioning of the two lines with respect to environmental review is problematic and frustrates analysis. Within the supplemental draft, we can't analyze the old line now and we won't analyze the new line later. As proposed, we never get to an analysis, we are either too early or too late. While we concede that some mitigation credit might be justified in co-location compared to pioneering a whole new route, it should be minimal as avoidance of any impact should be the priority under circumstances such as these.

### **Significant Lost Opportunity for Restoration (within a PAC)**

C The potential to underground or to relocate the existing transmission line outside of the PAC is a restoration opportunity the importance of which is difficult to overstate. The potential to enhance a PAC to this degree is significant for recovery and sustainability of the greater sage-grouse in Washington. Conversely, co-location of the new line and the old line above ground within the PAC removes this restoration opportunity since it would in essence, invest in the location to such a degree that subsequent remediation would be made financially unavailable. We must preserve significant opportunities for restoration within this key PAC if we have any hope of recovering the greater sage-grouse in Washington.

### **Mitigation**

D From a sage-grouse conservation standpoint, the Yakima Training Center PAC is an irreplaceable location. The transmission lines will be a significant negative impact to that PAC. We are being asked to mitigate for the irreplaceable, which is in itself a departure from the reasonableness standard. We are very concerned with the off-site, in kind as well as off-site out of kind mitigation that has been suggested as replication of a PAC is unlikely and without precedent. Mitigation should support the Yakima Training Center PAC.

The YTC is more topographically diverse than other PACs in Washington and it is strategically situated within Washington State. It also is in close proximity to the largest investments in habitat by the State of Washington, namely our wildlife areas. These public investments predate this proposal and their potential to contribute to greater sage-grouse recovery would be materially diminished as a result of this transmission line. Additionally, this proposal has been a race to the bottom of the mitigation sequencing

D hierarchy. The highest standard in the mitigation sequence is avoidance of the impact, yet all of the alternatives in this proposal are sited within a PAC. The bottom of the list and least desirable alternative in mitigation sequencing is off-site out-of-kind mitigation, and we find it unacceptable to sacrifice this greater sage-grouse population by attempting to mitigate impacts elsewhere. This proposal appears to be race to the bottom of the mitigation sequencing hierarchy before all other, more suitable options, have been thoroughly exhausted.

An overarching issue through the environmental review is the precarious population status of the greater sage grouse in Washington and the incautious nature of this proposal. Outside of the avoidance standard, the mitigation sequencing hierarchy loses flexibility when the birds are listed and have retracted to these last small PACs. Continuing to impact one of the last places greater sage-grouse occur with the hopes of mitigating for the impact at locations far removed from the impact area poses an unnecessary risk to a threatened public resource.

As we have previously stated during the environmental review process, transmission line burial is necessary to avoid adverse impact to greater sage- grouse in the Yakima Training Center PAC since all alternatives considered are located within it. Note that we are not suggesting burial of the entire length of the transmission line, but the strategic burial of the line in locations where greater sage-grouse distribution and migration to adjacent habitat is likely to occur.

### **Multiple Use**

E In the executive summary of the SDEIS (page es-ii), the BLM references the Federal Land Policy and Management Act of 1976 (FLPMA) multiple use mandate as their “need for action” to respond to Pacific Power’s right-of-way (ROW) application. The definition of multiple use, from Sec.103 from the BLM published version of the FLPMA<sup>1</sup> includes judicious use, balance, diverse resources, fish and wildlife, harmonious and coordinated management, future generations, and permanent impairment. Not every use is available on every acre. The use or resource with the most restricted distribution and flexibility with respect to occurrence and habitat should be viewed differently and weighed differently than a use that could be realized more broadly across BLM ownership. There is considerable plasticity as to where a transmission line could be placed: underwater, across a mountain, underground, across a desert, across farm land, over water or through a forest. Conversely, greater sage-grouse have a comparatively narrow set of habitat requirements and their distribution and population in Washington is small and threatened and opportunities to restore suitable habitat is also limited. Transmission lines are widespread and increasing in number. The proposal as presented appears to be a departure from the multiple use standard, particularly if significant greater sage-grouse restoration opportunities within the PAC are made unavailable in the course of this proposal.

## **Project Purpose**

F This proposal has been described as a measure needed in order to eliminate the potential for redistributed loads and the overloading of the adjacent transmission system. It would offer continued reliable and efficient service to the Yakima Valley and address future reliability issues within the Mid-Columbia transmission system, (bottom of page ES-i), and prevent failure to the regional transmission system if electrical outages of the existing Pomona–Wanapum 230 kV transmission line were to occur (bottom of page 2-5).

Outages are less frequent in underground transmission lines. We are told that outages involving buried transmission lines are longer, from 5 to 9 days or 8 to 12 days depending on the technology used (bottom of page 2-4). If repairs to the existing above ground lines could be performed in less than a day (our experience) or a far more brief time frame than the 5 to 9 days cited, why is the proposed new line being built to a 50 year standard if it is to address a temporary outage or temporary re-routing of electricity? This short time frame should be reflected and change assumptions regarding soil heating and line burial depth, which appear to be significantly overstated (top of page 2-43). Underground transmission lines standards could be reduced if the line is needed for emergency use and not continuous use. The assumptions in the SDEIS for line burial are for a line under continuous use which is different than the stated need.

## **Federal Listing of the Greater Sage-Grouse**

G The greater sage-grouse is listed as a threatened species by Washington State. It is also warranted but precluded for listing by the USFWS under the Endangered Species Act (ESA). A federal status review for a potential listing is fast approaching. One of the primary issues that the USFWS considers when conducting their review process for listing is the adequacy of existing regulatory mechanisms or protections for the species. In this Vantage to Pomona proposal, we have a federal agency, the Bureau of Land Management (BLM) conducting an Environmental Impact Statement (a federal process) across federal lands (Yakima Training Center, BLM, Bureau of Reclamation and Federal Highway Administration) on behalf of a public utility which also has a significant federal nexus. This development proposal with all these federal ties will significantly impact an irreplaceable location for sage-grouse. If we are unable to protect the bird here, under these sets of circumstances, it is unreasonable to conclude that we could protect the sage-grouse elsewhere on federal land or on private land apart from a listing. A federal listing would have broad implications on other existing and proposed transmission lines and power generating entities as well as the private sector. It could also increase required sage-grouse protection areas and significantly alter uses at the Yakima Training Center.

## **Failure to Incorporate Existing Studies**

H Numerous studies and reports have been developed that directly address the area and/or the issues associated with this transmission line proposal. The Conservation Objectives

H Team (COT) Report, the Statewide and Columbia Plateau Wildlife Habitat Connectivity studies, the Arid Lands Initiative (ALI) and the Washington State Greater Sage-Grouse Recovery Plan and the Western Governors Association (WGA) Crucial Habitat Assessment Tool or CHAT are all available to inform this project. The findings of these studies do not appear to be incorporated or to influence the alternatives. This is akin to performing an EIS and then developing a project in a location not contemplated in any of the alternatives. All alternatives are in the PAC or sage-grouse Habitat Concentration Areas (HCA) and center on this small remnant population of birds that has almost nowhere else to go.

### **Additional Information**

I Clearly we have continuing concerns regarding other shrub-steppe obligate wildlife such as the striped whipsnake, white-tailed and black-tailed jackrabbits, ground squirrels and other fossorial species that would be impacted by habitat loss and lost function associated with increased perching habitat resulting from this proposal.

We are concerned with the how the information portrayed on Tables 1, 2 and Table 4 on pages B-5-34 and B-5-37 is portrayed and is susceptible to misleading interpretation. These tables are a further partitioning of the PAC which is one of the last occupied slices of habitat in Washington State and must be relied on for recovery. The tables assign population utilization figures to a threatened species. This information might be compelling if a robust population existed but since the population is around 230 birds, few conclusions can be made about lower utilization figures. Table 4 portrays acres disturbed and fails to mention acres under the influence of the line (indirect impacts) which is a significantly greater type of impact with sage-grouse and is not widely understood.

Thank you for the opportunity to provide these comments. If you have any questions regarding these comments, I can be reached by phone at (509) 575-2740.

Sincerely,



Michael F. Livingston, Regional Director  
WDFW Region 3

### **References**

- 1) U.S. Department of the Interior, Bureau of Land Management and Office of the Solicitor (editors). 2001. The Federal Land Policy and Management Act, as amended. U.S. Department of the Interior, Bureau of Land Management Office of Public Affairs, Washington, D.C. 69 pp.



**Grant County**  
Office of The  
**Board of County Commissioners**  
P O Box 37  
Ephrata WA 98823  
(509) 754-2011

February 17, 2015

US Dept. of the Interior  
Bureau of Land Management  
ATTN: Vantage to Pomona Heights Supplemental Draft EIS  
915 Walla Walla Avenue  
Wenatchee, WA 98801

IN RE: Vantage to Pomona Supplemental Draft EIS Comments

To Whom It May Concern:

The Grant County Board of Commissioners is encouraged by the efforts of the Bureau of Land Management (BLM) to identify the New Northern Route (NNR) as a result, in part, of the public comments submitted in response to the January 2013 Draft Environmental Impact Statement (DEIS). The Board also appreciates the additional comment period for the Supplemental Draft Environmental Impact Statement (SDEIS). Please accept the following comments on the SDEIS:

**New Northern Route Alternative:**

A Grant County supports the NNR as its preferred alternative route for this redundant transmission line. The NNR would avoid the impacts outline by Grant County in its February 25, 2013 letter (enclosed).

After reviewing the SDEIS, it is clear that the data and information related to the NNR demonstrate that the NNR generally will result in fewer impacts than the Agency Preferred Alternative identified in the original DEIS. The SDEIS clearly should result in the elimination of the original 'Agency Preferred Alternative' from further consideration.

**Grant County Shoreline Master Program:**

B Grant County adopted an updated Shoreline Master Program (SMP) in September 2014, and it is now in effect. The updated SMP requires that any development that takes place within 200 feet (generally) of the ordinary high water mark (OHWM) of a jurisdictional body of water result in no net-loss of ecological function within the shoreline environment. The NNR proposes to cross the Columbia River just downstream of Wanapum Dam, in the vicinity of the other existing transmission lines. The eastern shoreline of the Columbia River now has a shoreline designation of Rural Conservancy.

Richard Stevens  
District 1

Carolann Swartz  
District 2

Cindy Carter  
District 3

Pursuant to Table 24.12.200(d) of the SMP, utilities are allowed with a Substantial Development Permit in the Rural Conservancy environment subject to compliance with the requirements in GCC 24.12.450. Additionally, if any of the support structures will be located within 200 feet of the OHWM of this portion of the river or if there will be any ground disturbing activities within this same area, additional mitigation measures will be required to ensure that no net-loss of ecological function of the shoreline area is achieved.

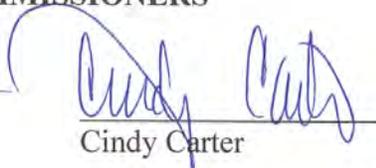
**Conclusion**

As the Grant County Board of County Commissioners stated in our February 25, 2013 letter regarding the DEIS, we support the development of infrastructure when it is done responsibly and when the supporting documentation for the project accurately characterizes the potential impacts and provides appropriate mitigation for those impacts that are unavoidable. It is our belief that the NNR contemplated in the SDEIS satisfies Grant County's concerns in terms of agricultural impacts, impacts to irrigation practices, and impacts to private properties. We encourage the BLM to select the NNR as the route for this facility; this decision is clearly supported by the SDEIS.

Sincerely,

**BOARD OF COUNTY COMMISSIONERS**

  
Richard Stevens, Chair

  
Cindy Carter

  
Carolann Swartz

DH:bjv

Cc: Damien Hooper, Planning Department Director



DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT COMMAND  
JOINT BASE LEWIS-MCCHORD YAKIMA TRAINING CENTER  
970 FIRING CENTER ROAD  
YAKIMA, WA 98901-9399

February 17, 2015

SUBJECT: Review of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Vantage to Pomona Heights 230 kilovolt (kV) Transmission Line Project

Spokane District , Records Manager  
Vantage to Pomona Heights SDEIS  
1103 North Fancher Road  
Spokane, WA 99212

To Whom It May Concern:

Joint Base Lewis-McChord Yakima Training Center (JBLM YTC) is in receipt of the Supplemental Draft Environmental Impact Statement (SDEIS) for the Vantage to Pomona Heights 230 kilovolt (kV) Transmission Line Project. Though all route options associated with this proposed action are still under consideration, the SDEIS focuses on a New Northern Route (NNR) that is located largely on JBLM YTC. The proposed emplacement of an additional transmission line across YTC would have negative impacts to training mission and natural resources. This letter provides comments by JBLM YTC on this proposal.

A a. This project increases the cumulative impacts that must be considered and mitigated for in the future. The mission of JBLM YTC is to provide training support for transient military units and organizations by sustaining training lands, range complexes, and support facilities in order to enhance readiness and to provide sustained capability now and into the future to train our nation's armed forces. This is done within the context of providing stewardship of resources in accordance with the Sikes Act. While the Army acknowledges the purpose and need for this project, it also recognizes the effects that such non-Army related projects can have on the consideration and analysis of future mission related projects and training events on YTC. The cumulative effects analysis within this document needs to address the potential to impact future mission related projects and training events.

B b. While the NNR reduced certain types of impacts from previous alternatives considered and eliminated on YTC, it will still have impacts to the military mission. An additional power line located on the installation, even though co-located with an existing one, increases safety hazards and operational concessions that must be considered in military aviation training operations. This incremental impact (NNR) represents encroachment on training capability and its direct, indirect, and cumulative effects on the training mission needs to be assessed in detail and disclosed in the document.

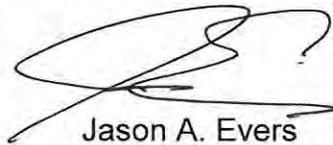
C c. JBLM YTC is concerned with a potential federal listing of sage grouse and impacts of this listing on the military mission. Protection measures for this species currently occur on 24 percent of the installation resulting in a reduction of training capacity. It is anticipated that additional land-use constraints are likely if the species is listed given the entire installation is within a Primary Area of Conservation (PAC) for sage grouse as identified within the Conservation Objectives Team report. Regulatory burdens on training lands associated with federally listing sage grouse could result in significant training restrictions putting the installation's ability to support its military mission in jeopardy. Additional reductions in training capacity, either from direct and indirect impacts from the placement of a power line on sage grouse or from the implementation of required mitigation measures resulting in increased land-use constraints, cannot be supported by the YTC.

D d. Not evident from previous and current documentation is whether there was consideration and analysis of route alternatives that avoids the area identified as the Yakima PAC. Evaluation of such a route would document an examination of a potentially viable alternative not already considered. Such a route, if proposed, would minimize direct, indirect, and cumulative impacts to sage grouse and eliminate impacts to the military training mission altogether.

E e. JBLM YTC understands that the mitigation framework to be utilized by the proponent in developing a mitigation plan for this project is still being developed by an interagency sage grouse working group associated with this project. It is the Army's position that it be made clear in the SDEIS that this framework only applies to this specific project. It is not a general purpose mitigation plan for Army training which is governed by other authorities and the installation INRMP.

Point of contact for this action is Mr. Steven Kruger, 509-577-3201, Deputy to the Garrison Commander, [steven.m.kruger2.civ@mail.mil](mailto:steven.m.kruger2.civ@mail.mil).

Sincerely,



Jason A. Evers  
Lieutenant Colonel, U.S. Army  
Commanding



**Washington State  
Department of Transportation**

Lynn Peterson  
Secretary of Transportation

South Central Region  
2809 Rudkin Road  
Union Gap, WA 98903-1648  
509-577-1600 / FAX: 509-577-1603  
TTY: 1-800-833-6388  
www.wsdot.wa.gov

February 19, 2015

US Department of the Interior  
Bureau of Land Management  
Spokane District  
Records Manager  
1103 N. Fancher Rd  
Spokane, WA 99212  
Attn: Vantage to Pomona Heights SDEIS

Subject: Supplemental Draft Environmental Impact Statement for the Vantage to  
Pomona Hts 230 kV Transmission Line Project – WSDOT's Comments

Dear Records Manager:

Thank you for the opportunity to provide the following comments on the Vantage to  
Pomona Hts Transmission Line Project Supplemental Draft EIS.

- A 1. **Page 1-10, Section 1.4.2.6 Washington State Department of Transportation:**  
The SDEIS and the FEIS must also address SEPA issues so that no other studies  
will be required necessary in order for WSDOT, as the SEPA nominal co-lead  
agency, to issue the SEPA determination for the project.
- B 2. **Page 3-109, Table 3.4-7 Land Use and Jurisdiction Summary by Route  
Segment, Transportation row, NNR-4 column:** WSDOT manages land in this  
route segment; however, the total in this column is blank.
- C 3. **Page 3-124, Section 3.7.2.1 Federal Highways and State Routes, 3<sup>rd</sup>  
paragraph:** There are four rest areas within the project area. The westbound Selah  
Creek Rest Area should be included as well.
- D 4. **Page 3-194, Section 3.11.4.9 MR-1, 2<sup>nd</sup> paragraph:** The information in this  
section states that the TCP has not yet been evaluated for NRHP eligibility. FHWA  
and WSDOT would like to know when this will take place.
- E 5. **Page 3-197, Table 3.11-2 Cultural Resources Within 150-Foot Corridors by  
Route Segment, MR-1 row:** In Section 3.11.4.9 MR-1, 1 TCP was reported  
within the 150-foot corridor. However, neither its presence nor its NRHP  
eligibility status is recorded in this table.
- F 6. **Page 3-197, Table 3.11-3 Cultural Resources Within 500-Foot Corridor by  
Route Segment, MR-1 row:** Same issue as Comment 5 within the 500-foot  
corridor.
- G 7. **Page 3-219, Section 3.14.3 Permitting Process:** WSDOT is not a regulatory  
agency, nor did WSDOT participate with the regulatory agencies to develop the  
JARPA process.
- H 8. **Page 4-97, Section 4.4.4.8 Route Segment NNR-8, 3<sup>rd</sup> paragraph:** Please note  
that WSDOT approval is required in order for the project to cross SR 243.

- I 9. **Page 4-114, Section 4.7.1.3 Impact Types, 1<sup>st</sup> paragraph:** WSDOT concurs that I-82 and SR 243 will not be closed during construction of the towers; however, stringing of the lines would require closures. The statement "Transmission line construction would not require temporary closure of the main highways (Interstate [I] 82 and State Route [SR] 243)..." is contradictory to information provided on Page 4-116, which states "Transmission line stringing activities over state highways and county roads could require the temporary closure of traffic lanes..." (emphasis added)
- J 10. **Page 4-114, Section 4.7.1.3 Impact Types, 2<sup>nd</sup> paragraph:** The section of I-82 is designated as a Scenic Class A highway. Because of this designation, special design should be incorporated to minimize the visual impacts of the project.
- K 11. **Page 4-115, Section 4.7.3 Impacts Common to All Route Segments and Design Options, 3<sup>rd</sup> paragraph:** The first sentence is the same issue as Comment 9. Please change this to say "Project construction activities would not may require major road closures at the I-82 or SR 243 crossings during construction. ; however, lane Other road closures may also occur..."
- L 12. **Page 4-115, Section 4.7.3 Impacts Common to All Route Segments and Design Options, 4<sup>th</sup> paragraph:** Please note that WSDOT is not responsible for approving the TMP for county roads. Please change this to say either "...approved by WSDOT and/or local agencies..." or "...approved by WSDOT and/or agencies with jurisdiction..."
- M 13. **Page 4-115, Section 4.7.3 Impacts Common to All Route Segments and Design Options, 5<sup>th</sup> paragraph:** Access to the interstate is highly restricted to the interchanges. Access at Exit 11 to cross onto private property or to JBLM YTC requires either a permanent access break (such as for maintenance) or a temporary access break (such as for construction).
14. **Page 4-115, Section 4.7.3 Impacts Common to All Route Segments and Design Options, 5<sup>th</sup> paragraph:** The text states "A permanent access break, authorizing the use of Exit 11, would be required for construction access." Since this action is related to construction, a temporary access break would be required.
- N 15. **Page 4-116, Impacts Common to All Route Segments and Design Options, 3<sup>rd</sup> paragraph:** Similar issue as Comment 13. Please change to "...This permission would be secured prior to applying for a permanent or temporary break in access permit."
- O 16. **Page 4-118, Section 4.7.4.1 Route Segment NNR-1, 1<sup>st</sup> paragraph:** Access to this segment from I-82 would be from Exits 26 or 29 only.
- P 17. **Page 4-119, Section 4.7.4.3 Route Segment NNR-3, 2<sup>nd</sup> paragraph:** Please note that the eastbound Selah Creek Rest Area is located at approximately MP 24.5.
18. **Page 4-119, Section 4.7.4.3 Route Segment NNR-3, 2<sup>nd</sup> paragraph:** The text states "No permanent access break would be required for this crossing." If the project will cross the interstate (either above- or below-ground), a permanent access break is required.
- Q 19. **Page 4-121, Section 4.7.4.4 Route Segment NNR 4o/4u, Overhead Design Option, 1<sup>st</sup> paragraph:** Use of Exit 11 will require FHWA and WSDOT approval.

20. **Page 4-121, Section 4.7.4.4 Route Segment NNR 4o/4u, Overhead Design Option, 2<sup>nd</sup> paragraph:** Depending on the project proponent's future maintenance needs, an access break could be temporary or permanent.
21. **Page 4-121, Section 4.7.4.4 Route Segment NNR 4o/4u, Underground Design Option:** The crossing at I-82 in this segment should be undergrounded as well.
- R 22. **Page 4-124, Section 4.7.4.9 Route Segment MR-1, 2<sup>nd</sup> paragraph:** See Comment 10.
- S 23. **Page 4-124, Section 4.7.4.9 Route Segment MR-1, 2<sup>nd</sup> paragraph:** A Utility permit will be required.

In addition, WSDOT's comment letter dated March 8, 2010 on the Draft EIS (*attached*) is included as part of WSDOT's comments on the Supplemental Draft EIS.

Please contact Myria Foisy at 509-577-1924 or foisymj@wsdot.wa.gov if you have any questions.

Sincerely,



William Sauriol  
SCR Environmental Manager

WS:MJF

Attachment: Letter Dated 3/8/10

cc: Elizabeth Healy, FHWA  
Jamil Anabtawi, WSDOT Utilities Engineer  
Paul Gonseth, WSDOT Planning Engineer  
Carter Timmerman, WSDOT Aviation



**Washington State  
Department of Transportation**

**Paula J. Hammond, P.E.**  
Secretary of Transportation

**Transportation Building**  
310 Maple Park Avenue S.E.  
P.O. Box 47300  
Olympia, WA 98504-7300  
360-705-7000  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

March 8, 2010

Bill Schurger  
BLM Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801

RE: Scoping comments for Vantage-Pomona Heights 230K Transmission Line Project

Dear Mr. Schurger:

Thank you for the opportunity to provide comment on the EIS scoping for the Vantage-Pomona Heights 230K Transmission Line Project. WSDOT Aviation is concerned that the proposed eastern alternative for the Vantage-Pomona Heights transmission line project will affect the ability of Desert Aire Airport to function as an essential public facility and will ultimately diminish its long term viability.

Desert Aire Airport is located in Grant County, Washington, adjacent to the Columbia River. The airport has eighteen base aircraft, including multi-engine, single-engine and ultralight aircraft. The airport supports more than 1,000 operations per year, and is classified as a rural essential airport by the Washington State Aviation System Plan (WASP).

In developed areas, the Vantage-Pomona Heights 230K Transmission Line Project is described as single wood or steel poles 75 to 85 feet high with an average span length of 600 feet. Tall structures can penetrate and obstruct the navigable airspace that is necessary for safe aircraft operations. The metric used most often to measure this airspace is the FAA's FAR Part 77 '*imaginary Airspace surfaces*'. Airspace obstructions endanger the lives and property of airport users and occupants of land in its vicinity. Airspace obstructions are considered to be incompatible with airports, and can have an immediate and/or cumulative effect on aviation facilities. Some of these impacts include:

- Increased safety risk
- Degraded airport operations
- Limited current and future economic development opportunities
- Lost value of public investment
- Decline in transportation access

- Precludes airport expansion or modification resulting from demand or new technology

WSDOT Aviation has performed an airspace assessment of the proposed eastern alternative in relation to Desert Aire's current operational environment. WSDOT offers the following observations and recommendations:

- The eastern alternative for the Vantage-Pomona Heights transmission line falls directly within the approach to Desert Aire's runway 28
- The proposed eastern alternative is within a euclidian distance of 599 feet of the Desert Aire runway
- The proposed transmission line height of 75 feet would penetrate the approach surface of Desert Aire's runway 28 by 35 feet.
- The proposed transmission line falls within Desert Aire's runway protection zone.
- The proposed 240K transmission line would represent a significant threat to aircraft operations at Desert Aire Airport

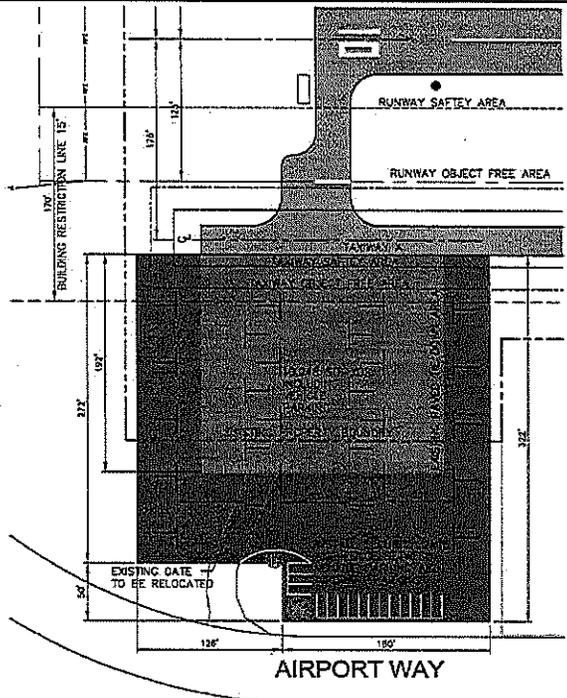
Given the eastern alternative's potential impacts on Desert Aire Airport, WSDOT Aviation recommends that it be studied and altered dramatically or be abandoned as a viable alternative. We thank you again for the opportunity to comment, and remain available to provide technical support and assistance. WSDOT Aviation requests that this correspondence be a part of the formal record. Please don't hesitate to contact me at 360-651-6312 or [timmerc@wsdot.wa.gov](mailto:timmerc@wsdot.wa.gov) if you have any questions.

Respectfully yours,



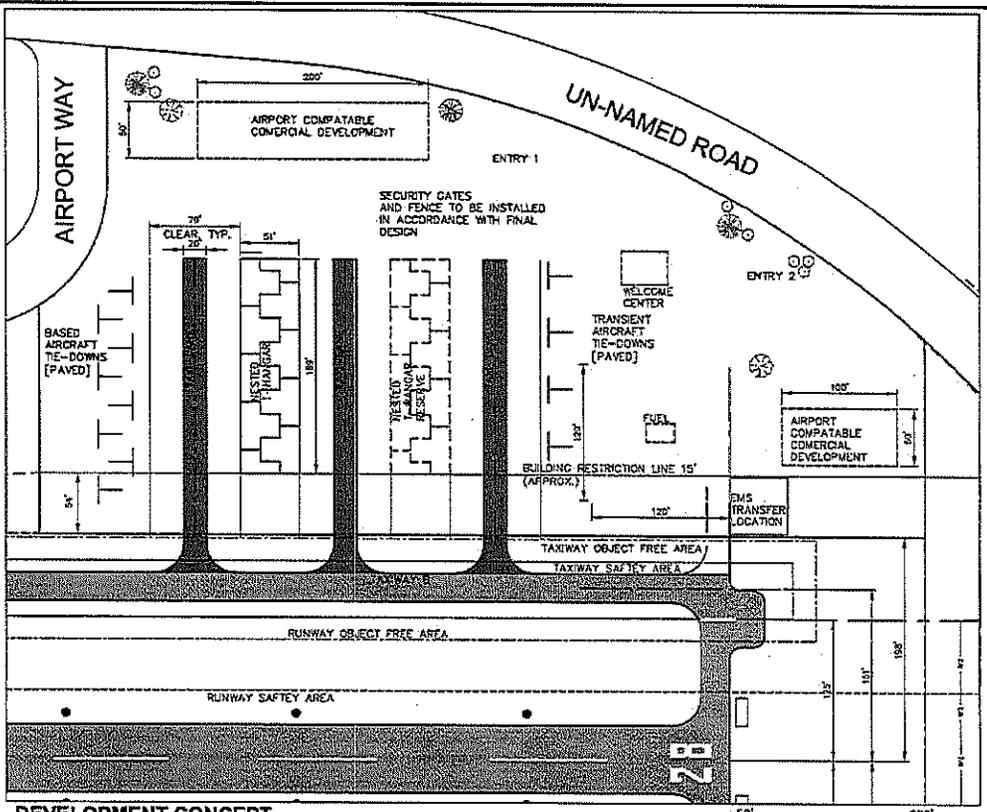
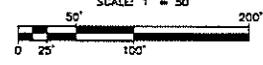
Carter Timmerman  
Associate Aviation Planner  
[TimmerC@wsdot.wa.gov](mailto:TimmerC@wsdot.wa.gov)  
360-651-6312 wrk

CC: Cliff Naser, Desert Aire Airport  
Ted Hill, WSDOT  
Cindy Tremblay, WSDOT



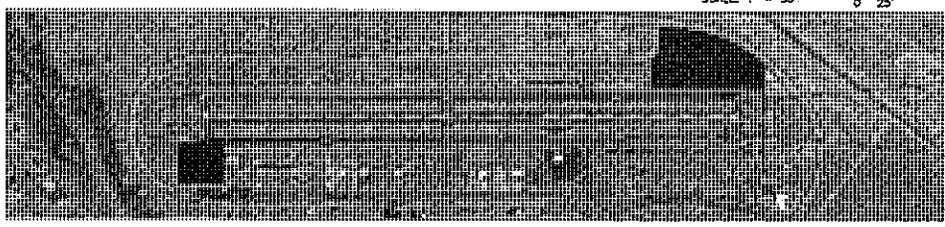
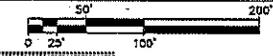
APRON EXPANSION CONCEPT

GRAPHIC SCALE  
SCALE: 1" = 50'



DEVELOPMENT CONCEPT

GRAPHIC SCALE  
SCALE: 1" = 50'



MAGNETIC DECLINATION  
18°15' EAST  
ANNUAL RATE OF CHANGE  
0°09' WEST (JUNE 2003)

TABLE 1 - LEGEND	
SYMBOL	DESCRIPTION
---	AIRPORT PROPERTY LINE
▨	BUILDING CONSTRUCTION
▩	TIE-DOWNS
○	RUNWAY THRESHOLD LIGHTS
---	BUILDING RESTRICTION LINE (15')
---	RUNWAY PROTECTION ZONE
---	RUNWAY SAFETY AREA
---	RUNWAY OBJECT FREE AREA
---	RUNWAY OBSTACLE FREE ZONE

DATE	REVISION	BY

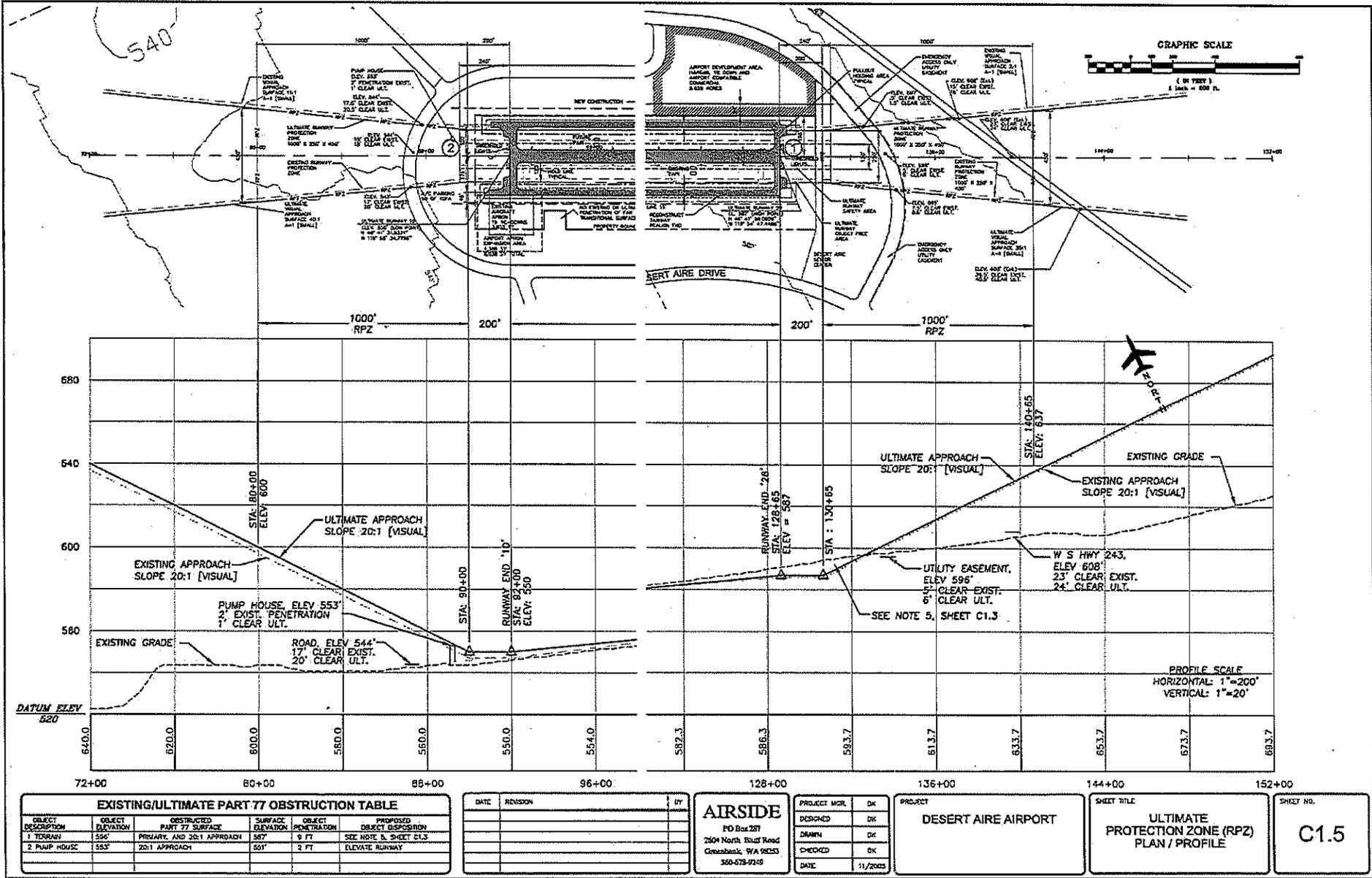
**AIRSIDE**  
PO Box 287  
2604 North 87th Road  
Orcutt, WA 98223  
360-679-9749

PROJECT MGR.	DR
DESIGNED	DR
DRAWN	SW
CHECKED	DR
DATE	1/2008

PROJECT  
**DESERT AIRE AIRPORT**

SHEET TITLE  
**BUILDING AREA PLAN**

SHEET NO.  
**C1.2**



**EXISTING/ULTIMATE PART 77 OBSTRUCTION TABLE**

OBJECT DESCRIPTION	OBJECT ELEVATION	OBSTRUCTED PART 77 SURFACE	SURFACE ELEVATION	OBJECT PENETRATION	PROPOSED OBJECT DESCRIPTION
1. TAXIWAY	550'	PRIMARY AND 30:1 APPROACH	557'	3 FT	SEE NOTE 5, SHEET C1.3
2. PUMP HOUSE	553'	20:1 APPROACH	551'	2 FT	ELEVATE RUNWAY

DATE	REVISION	BY

**AIRSIDE**  
 PO Box 287  
 2604 North Stout Road  
 Greenbank, WA 98253  
 360-678-9150

PROJECT MGR.	DK
DESIGNED	DK
DRAWN	DK
CHECKED	DK
DATE	11/2005

**PROJECT**  
**DESERT AIRE AIRPORT**

**SHEET TITLE**  
**ULTIMATE PROTECTION ZONE (RPZ) PLAN / PROFILE**

**SHEET NO.**  
**C1.5**

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# United States Department of the Interior



**FISH AND WILDLIFE SERVICE**  
**Washington Fish and Wildlife Office**  
Central Washington Field Office  
215 Melody Lane, Suite 119  
Wenatchee, WA 98801

In Reply Refer To:  
2014-CPA-0004

FEB 24 2015

Memorandum

To: Field Manager, Bureau of Land Management  
Wenatchee, Washington  
Attention: Linda Coates-Markle

From: *For* State Supervisor, Washington Fish and Wildlife Office  
Lacey, Washington

Subject: U.S. Fish and Wildlife Service Comments on the Notice of Availability of the  
Vantage-Pomona Transmission Line Project Supplemental Draft Environmental  
Impact Statement

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to review and provide comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Vantage-Pomona Transmission Project (Project). The Service applauds Bureau of Land Management's (BLM) efforts in the SDEIS to address significant greater sage-grouse (*Centrocercus urophasianus*, hereafter "sage-grouse") issues associated with the Project and BLM's excellent management of the project's planning phase. The Service has been active participant in the development of this SDEIS due to our concerns related to the proposed Project's effects on sage-grouse and migratory birds. These comments are provided in accordance with the provisions of the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 *et seq.*), as amended; the Endangered Species Act (ESA) (16 U.S.C. 1531 *et seq.*), as amended; the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712), Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668-668c), as amended; and the Federal Power Act (16 U.S.C. 791-828c *et seq.*), as amended.

The project area is situated in south-central Washington State, extending from the Bonneville Power Administration's Vantage substation, just east of the Wanapum Dam in Grant County, to Pacific Power's Pomona Heights Substation near Selah, Washington. Three alternatives are considered in the SDEIS: 1) No Action; 2) New Northern Route (NNR) Alternative and the Manastash Ridge Subroute with an underground option; and 3) the Draft Environmental Impact Statement (DEIS) Action Agency Preferred Route.

The Service's primary concern with the Project is its potential effect on sage-grouse. The Project has the potential to affect shrub-steppe habitat on the Joint Base Lewis-McCord Yakima Training Center (JBLM-YTC). Together with the Hanford site, JBLM-YTC is one of the largest blocks of shrub-steppe remaining in Washington. This Project's preferred alternative is located within two-miles of an active sage-grouse lek and is within and immediately adjacent to areas identified by the Service and WDFW as priorities for sage-grouse conservation (i.e., Priority Areas of Conservation (PAC) and surrounding Sage-grouse Management Units). The Project is also located in JBLM-YTC's designated Sage-grouse Protection Areas (SGPA). The Project's location within the SGPA and PAC and overlap with an active sage-grouse lek magnifies our desire to find ways to avoid or minimize the impact of the Project on this candidate species. In addition to sage-grouse concerns, the Service is concerned about the Project's effects to migratory birds, including bald and golden eagles. Our comments below are intended to provide specific ideas effective in minimizing Project effects on these federal trust resources.

### **Sage-Grouse**

The sage-grouse is a candidate for listing under the ESA. Currently there are two isolated sage-grouse populations remaining in Washington that comprise the Columbia Basin distinct population segment (DPS). One population is found predominantly on private lands in Douglas and Grant counties and the other is located on JBLM-YTC. The status of both populations is tenuous due to their small size, isolation from other populations, and other factors affecting their habitat, such as human development and wildfire.

Sage-grouse populations and habitat in Washington have declined significantly. Their range has declined to about 8% of the historic range primarily due to conversion of shrub-steppe to crop production and degradation of remaining native habitat. The population declined from approximately 3,800 birds in 1970 to 910 in 2014 (Stinson and Schroeder 2014; Michael Schroeder, WDFW, pers. Com. November 5, 2014). Of 76 lek complexes (a lek or group of leks within 2.5 km of each other between which male sage-grouse may interchange from one day to the next) documented since 1960, 64% are currently vacant (Schroeder et al. 2013). Fifty-three percent of vacant lek complexes are in areas where sage-grouse have become extirpated since 1960. Sage-grouse have persisted in Washington primarily because certain portions of their range are poorly suited to agriculture and because the military ownership of the JBLM-YTC has prevented some habitat conversion.

When reviewing a new energy or infrastructure project, the Service employs the Conservation Opportunities Team Report (COT Report) and the Sage-grouse Rangewide Mitigation Framework (Mitigation Framework), to provide recommendations and guidance applicable to project siting, construction, restoration, operation, maintenance, and mitigation. New energy and infrastructure projects, if placed in or near sage-grouse habitats, will exist on the landscape for decades or longer and accrue direct and indirect impacts to sage-grouse and their habitats. Therefore, it is advisable to take affirmative conservation actions now to help the JBLM-YTC sage-grouse population persist and possibly recover in the future.

The Service collaboratively developed the COT Report to summarize threats to sage-grouse and its habitats and define broad actions and measures that should be followed to address declining sage-grouse populations and habitat trends. The COT Report also provides specific Conservation Objectives, with energy and infrastructure project-specific options for actions and measures to avoid impacts to sage-grouse and their habitats. Where impact avoidance cannot be fully accomplished, the COT Report provides options for actions and measures to minimize project impacts. The Mitigation Framework complements the COT's summary of threats and conservation concepts and guidance and further identifies factors the Service can use in evaluating the efficacy of mitigation actions.

Using these two source documents' recommendations and guiding principles, the Service offers the following comments in areas for which the Project is inconsistent with the COT and/or Mitigation Framework.

#### *Avoid Siting Energy Projects in PACs*

A All Alternatives for the Project are sited within the JBLM-YTC PAC. The Service requests the development of alternatives avoiding direct and indirect impacts to the JBLM-YTC PAC. This is a reasonable request considering this project would impact one of only two native populations of sage-grouse in the entire Columbia Basin DPS. All alternatives presented in the DEIS and SDEIS, including the Agency Preferred Alternative, pose additive direct and indirect effects to the JBLM-YTC PAC. We recommend that Washington BLM follow the strategy for proposed right-of-way projects, as found in their *Instruction Memorandum No. 2012-043: Greater Sage-grouse Interim Management Policies and Procedures (IM 2012-043)* by developing alternatives that avoid the JBLM-YTC PAC to the maximum extent possible. BLM has not demonstrated that avoiding impacts to the PAC is not feasible.

#### *Avoid Selecting the Agency Preferred Route*

B After our review of the SDEIS and comparison to the DEIS, we find that the DEIS Agency Preferred Route is still the proposed route furthest south of JBLM-YTC and one we do not prefer. The current DEIS Agency Preferred Route to the south and east of JBLM-YTC is not the best route for sage-grouse, since the southern section of the route passes within close proximity to historic breeding habitat and current habitat concentration areas and hinders dispersal to the southeast Rattlesnake Hills and Hanford Sage-grouse Management Units. For these reasons the Service does not support selection of this route.

#### *Avoid Impacts to Sage-grouse Habitat in PACs*

C Although the Service typically favors collocation with existing structures causing disturbance, especially when the collocation is proposed at the narrowest possible centerline-to-centerline separation distance, the Service's assessment is that the existing Pomona-Wanapum 230kV Transmission Line already causes significant direct and indirect impacts to sage-grouse, including impacts to the JBLM-YTC PAC. Figure 5, *Time Series of Sage-grouse Population Ranges (page 3-47 in the SDEIS)*, demonstrates a gradual southeastward shift in the JBLM-YTC sage-grouse population range and core population, away from the Pomona-Wanapum

Transmission Line corridor. In considering collocation of a new route with this existing transmission corridor, the *Final Environmental Impact Statement (FEIS)* should contain a broader evaluation of the ongoing impacts and opportunities to reduce impacts of the existing Pomona-Wanapum Transmission Line.

D The Right-of-Way (ROW) grant for the Pomona-Wanapum Transmission Line's crossing of the JBLM-YTC PAC will expire in 2024, at which point the proponent would need to renegotiate the grant. This creates an important opportunity to reduce effects to sage-grouse habitat, both within and outside of PACs. Collocated construction of the lines with this existing transmission line would complicate future options to better site and/or reduce impacts of this existing transmission line. Therefore, a commitment to bury sections of the NNR or any collocated lines surrounding JBLM-YTC is critical in the long term management of both new and existing collocated lines. This level of commitment is not evident in the SDEIS.

E Other than avoiding impacts altogether through an alternative route, undergrounding discrete sections of the NNR, in addition to collocation with the existing Pomona-Wanapum Transmission Line, appears to be the most suitable of the currently proposed NEPA alternatives to minimize the direct and indirect effects of the proposed Project on the sage-grouse. While this alternative would still create significant, long-term direct and indirect impacts in a PAC, this alternative would promote connectivity between two isolated sage-grouse populations and minimize impacts to sage-grouse survival and surrounding habitat. The NNR co-located route does have some improved consistency with the COT and Mitigation Framework, and could be improved by stronger commitments to undergrounding certain discrete segments. However, while the Service does see some merit in the NNR with undergrounding and collocation, we continue to recommend that an alternative be evaluated that avoids all sage-grouse priority habitat to the greatest extent.

#### *Offset Direct and Indirect Impacts and Derive a Net Conservation Benefit to Sage-grouse*

The SDEIS includes a Mitigation Framework developed to minimize the amount and significance of impacts from the proposed Project to sage-grouse. This Mitigation Framework is being further developed by Project stakeholders. The foundational principles and standards contained in the Mitigation Framework offer a basis from which impacts can be assessed and successful mitigation opportunities can be implemented. It is intended to guide the development of impact assessment and mitigation programs for sage-grouse and the eventual development of a Habitat Mitigation Plan (HMP).

The Mitigation Framework provides a clear path for assessing and addressing the Project's direct and indirect effects on sage-grouse, including compensatory mitigation. The sage-grouse and transmission line scientific literature and analytics provided in the Mitigation Framework represents the best available science on this topic, and should be rigorously applied to the Project. Unless a new NEPA alternative is identified that fully avoids direct and indirect impacts to the JBLM-YTC PAC, any of the existing alternatives (including the NNR with collocation and undergrounding) will cause significant impacts to sage-grouse, and will therefore require a significant compensatory mitigation commitment for this highly imperiled PAC.

The Mitigation Framework should guide the applicant on how to assess impacts, quantify those impacts, apply mitigation ratios, define acceptable mitigation credits, and ensure those mitigation actions meet the Standards of the Service's Rangelwide Sage-grouse Mitigation Framework. The Mitigation Framework should be used by BLM and cooperating agencies to review the adequacy of various draft HMPs, and the BLM should ensure the final HMP addresses all Mitigation Framework inconsistencies. The HMP, upon final determination of its consistency with the Mitigation Framework, should be made a durable condition of any ROW permits issued by BLM or other cooperating agencies for the Project. Therefore the following language should be included in the FEIS. This will ensure the applicant and public understand the importance of the Mitigation Framework and its application to the HMP and how any ROW authorization will ensure the HMP is durable over the life of the Project:

*Each authorizing agency may utilize the final HMP to assess whether the applicant's proposed mitigation action complies with that agency's applicable laws, regulations, and government policies. The authorizing agencies will require inclusion of the HMP as a condition of approval for any grant of ROW, permit, or other required written approval and/or authorization. The final HMP will address Project impacts and compensatory mitigation across all land ownerships. Adopting the HMP to address impacts and mitigation actions across all land ownerships will be a condition precedent for all agencies' granting and continuing to authorize each agency's individual ROW. Should the proponent not follow through on the HMP for impacts accrued across any land ownership, each individual agency may suspend or terminate their individual ROW, regardless of which land ownership the inconsistency occurred upon.*

### **Compliance with the ESA**

Section 7 of the ESA and its implementing regulations (at 50 CFR Part 402) require Federal agencies to review their actions at the earliest possible time to determine whether any action may affect listed species or critical habitat. Although not required by ESA, the Service encourages the formation of partnerships to conserve candidate species. By definition, these species may warrant future protection under the ESA. The effects of the proposed action, while mitigated by conservation measures, are still anticipated to result in a net loss of shrub-steppe habitat and could result in the direct loss of individual sage-grouse, lek abandonment, and/or abandonment or loss of sage-grouse nests. Therefore, it is the Service's opinion that a formal conference should occur for this Project. The BLM should prepare a Biological Assessment to evaluate the potential effects of the Project on sage-grouse and determine whether the action may be likely to jeopardize the continued existence of sage-grouse.

The ESA does not preclude the BLM from taking an action with adverse effects to the sage-grouse as a candidate species. However, if the sage-grouse is listed, the BLM may be required to modify or suspend its on-going operations pending completion of formal consultation under section 7 of the ESA.

## Migratory Birds

The MBTA and BGEPA prohibit the taking or killing of migratory birds and eagles, and their eggs as well as the taking of their parts and nests. The destruction or disturbance of a migratory bird nest that results in the loss of eggs or young is also a violation of the MBTA. Executive Order 13186 (66 FR 3853) directs federal agencies to identify where unintentional take is likely to have a measurable negative effect on migratory bird populations and to avoid or minimize adverse impacts on migratory birds through enhanced collaboration with the Service. The Service and BLM have developed a Memorandum of Understanding regarding BLM's responsibilities under Executive Order 13186.

H The Service remains concerned about the lack of protection afforded to migratory birds included in the SDEIS and the manner in which measures to minimize impacts to migratory birds have been formalized in the SDEIS. The proposed Project location is within an area frequented by bald eagles, golden eagles, and other raptors along the Columbia River. The proposed Project is also within a shrub-steppe landscape interspersed with numerous smaller-scale wetlands that may hold intermittent surface water. These habitats support shrub-steppe and water-dependent birds. Many of these migratory birds are identified as Birds of Conservation Concern by the Service and should be specifically addressed in the SDEIS, per our review comments of chapters contained in the draft SDEIS.

Due to the potential to affect avian resources which fully utilize the proposed Project location, we strongly advise that a *project-specific* Migratory Bird Conservation Plan (MBCP) be developed to minimize negative impacts associated with the construction and long-term operation and maintenance of the Project. A MBCP should require monitoring of bird mortality and adaptive management to facilitate implementation of strategies to reduce injury and fatality of migratory birds. Adaptive management could include appropriate operational modifications in the event that multiple fatalities or injuries occur and avian predator management to reduce adverse impacts to sage-grouse. The MBCP also should have a compensatory mitigation component to address the Project's multiple habitat types and long-term impacts on migratory bird habitats.

According to the SDEIS, it is our understanding that avoidance and minimization measures for migratory birds includes avoiding construction, maintenance, or other activities during the breeding season, typically March through July, to prevent abandonment or loss of nests, collision of adult birds with vehicles, or possible crushing of birds and nests resulting from overland routes, all which result in incidental take of protected species. If construction or maintenance activities must occur during the migratory bird nesting season, then a qualified biologist would inspect the area no more than 72 hours prior to activity to reduce the chance of adverse impacts to nesting migratory birds. No right-of-way mowing would occur during the nesting season as these activities are at too large of a scale to provide adequate protection of migratory birds. These are all important conservation commitments and should be clearly articulated within the project-specific MBCP.

I In addition, many common raptors are still excluded from Project Design Feature BIO-13, including, but not limited to, red-tailed hawk (*Buteo jamaicensis*), Swainson's hawk (*Buteo swainsoni*), American kestrel (*Falco sparverius*), northern harrier (*Circus cyaneus*), long- and short-eared owls (family *Strigidae*), and the great horned owl (*Bubo virginianus*).

Impacts to these common raptors should be addressed. We also suggest incorporating protective measures into final Project designs to avoid bald eagle winter roosts, if identified along the proposed routes.

J In summary, the Service recommends placing all mitigation-related commitments into an applicant-proposed Migratory Bird Conservation Plan that is specific to the Project and not just rely on commitments disclosed in the environmental analysis documents and application of the broader company-wide Avian Protection Plan requirements.

### Summary of Comments

K Once again, the Service appreciates the opportunity to provide input on the SDEIS. However, we must emphasize that alternatives that would avoid impacts, or greatly reduce them through alternative power line alignments, to the JBLM-YTC PAC should be fully evaluated. It has not been demonstrated that such alternatives are not feasible. We look forward to continuing our partnership with the BLM to enhance sage-grouse conservation in the state of Washington. We also encourage you to continue coordination of the Project with the Washington Department of Fish and Wildlife and will assist you in this effort as needed.

Please contact Steve Lewis, Fish and Wildlife Biologist by phone at 509-665-3508 ext. 2002, or by e-mail at [stephen\\_lewis@fws.gov](mailto:stephen_lewis@fws.gov) for questions regarding the Project and associated development of studies to assess the route alternatives. Refer all technical assistance questions regarding sage-grouse to Heather McPherron, Fish and Wildlife Biologist by phone at 509-665-3508 ext. 2011, or by e-mail at [heather\\_mcperron@fws.gov](mailto:heather_mcperron@fws.gov). Again, thank you for including us in the review of the proposed Project.

#### cc:

USFWS, Portland, OR (E. Mead)  
USFWS, Portland, OR (S. Damiani-Stavrakas)  
USFWS, Portland, OR (J. Delia)  
USFWS, Portland, OR (D. Young and S. Ginger)  
WDFW, Yakima, WA (M. Livingston)  
JBLM-YTC, Selah, WA (S. Kruger)

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**APPENDIX G  
COOPERATING AGENCY ALTERNATIVE PREFERENCE  
SELECTION FORMS**

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**Alternative Preference Ranking Certification Form**

**Cooperating Agency or Tribe:** Bonneville Power Administration

**Agency or Tribal Authorized Official Preparing the Certification Form:** Dave Kennedy, Acting Manager, Environmental Policy and Analysis

**Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.**

1. \_\_\_\_\_

3. \_\_\_\_\_

2. \_\_\_\_\_

4. \_\_\_\_\_

**Abstain**

**Rationale for Alternative Preference Ranking (please attach additional material if needed):**

I certify that the above information and any additional supporting rationale provided represents the Official Alternative Preference Ranking of Bonneville Power Administration for the  
(Cooperating Agency or Tribe)  
Proposed Vantage to Pomona Heights 230kV Transmission Line Project.

Signature:  Printed Name: Dave Kennedy  
(Authorized Official)

Title: Acting Manager Environmental Planning and Analysis Date: June 6, 2015

**Alternative Preference Ranking Certification Form**

**Cooperating Agency or Tribe: Bureau of Reclamation**

**Agency or Tribal Authorized Official Preparing the Certification Form:**

Bruce Loranger, Land Resource and Environmental Compliance Supervisor

**Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.**

1. Manastash Ridge Sub route NNR                      3. Overhead Design option NNR  
2. Undergrounding design option NNR                      4. Alternative G

**Abstain**

**Rationale for Alternative Preference Ranking (please attach additional material if needed):**

The Bureau of Reclamation developed the Yakima Basin Irrigation Project and the Columbia Basin Irrigation Project in the early 1900's. The purpose at the time was to promote the settlement of the arid west. With the end of World War II the nation needed places for the returning veterans to not only work but to live and develop new means to feed a growing country.

Reclamation provided the infrastructure by acquiring large tracts of land for agricultural development. Irrigation canals were constructed and water delivery stems were developed to allow for irrigation water to be provided to individual land owners. This development includes the Grand Coulee Dam, Banks Lake, Dry Falls Dam, Potholes Reservoir, O'Sullivan Dam, and over 1500 miles of large canals and nearly 6000 miles of smaller distribution system of laterals and wasteways to irrigate 670,000 acres current with authorization to irrigate up to 1.25 million acres within the Columbia Basin Project.

In the 1970's and 80's Irrigation Blocks 24, 25, 251, and 253 where developed in and around the Mattawa area. There were plans to develop additional irrigation blocks, but those plans were put on hold in 1993 when Salmon species within the Columbia River drainage where listed as threatened or endangered.

The construction of the Irrigation Project was paid for by the Federal Government. Each landowner then entered into an agreement to repay the federal debt over time. This agreement was later modified to include the cost of operation and maintenance of the facilities.

Therefore, Reclamation cannot support an alternative that could have an adverse economic effect on landowners and the Irrigation District which has an obligation to the United States

Government for the construction, operation and maintenance of the irrigation project.

Reclamation's preferred alternative is the Manastash Ridge sub route of the new northern route. This alternative would have the least impacts to prime farm land, affecting the least number of individual Irrigation Districts, have the least impact to Reclamation land holdings, and meets the concerns of individual land owners within the Columbia Basin Irrigation Project that could be affected by this proposal.

The other alternatives that Reclamation could support would be the other three northern route alternatives or alternative G.

I certify that the above information and any additional supporting rationale provided represents the

Official Alternative Preference Ranking of Bureau of Reclamation for the  
(Cooperating Agency or Tribe)

Proposed Vantage to Pomona Heights 230kV Transmission Line Project.

Signature:  Printed Name: Julia Pierko  
(Authorized Official)

Title: Ephrata Field Office Manager Date: 07/20/15  
ACTING

**Alternative Preference Ranking Certification Form**

<b>Cooperating Agency or Tribe:</b> Federal Highway Administration	
<b>Agency or Tribal Authorized Official Preparing the Certification Form:</b> Elizabeth Healy	
<input type="checkbox"/> <b>Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.</b>	
1. _____	3. _____
2. _____	4. _____
<input checked="" type="checkbox"/> <b>Abstain</b>	
<b>Rationale for Alternative Preference Ranking (please attach additional material if needed):</b> All alternatives are acceptable to FHWA based on mitigation measures put in place to avoid, minimize, and mitigate impacts to safety, operations, and maintenance on I-82.	

I certify that the above information and any additional supporting rationale provided represents the Official Alternative Preference Ranking of Federal Highway Administration for the Proposed Vantage to Pomona Heights 230kV Transmission Line Project.  
(Cooperating Agency or Tribe)

Signature:  Printed Name: ELIZABETH HEALY  
(Authorized Official)

Title: Right of Way Program Manager/Environmental Specialist Date: 6/29/15

Alternative Preference Ranking Certification Form

Cooperating Agency or Tribe: <u>GRANT COUNTY</u>	
Agency or Tribal Authorized Official Preparing the Certification Form: <u>DAMIEN HOOPER</u>	
<input type="checkbox"/> Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.	
1. <u>NNR U/G DESIGN</u>	3. <u>NNR MANASTASH</u>
2. <u>NNR O/H DESIGN</u>	4. <u>N/A</u>
<input type="checkbox"/> Abstain	
Rationale for Alternative Preference Ranking (please attach additional material if needed): <u>AS PRESENTED AT SELECTION MEETING.</u> <u>REFERENCE GRANT COUNTY BOCC COMMENT LETTERS</u> <u>SUBMITTED FOR DEIS &amp; SDEIS.</u>	

I certify that the above information and any additional supporting rationale provided represents the

Official Alternative Preference Ranking of GRANT COUNTY for the  
(Cooperating Agency or Tribe)

Proposed Vantage to Pomona Heights 230kV Transmission Line Project.

Signature:  Printed Name: DAMIEN HOOPER  
(Authorized Official)

Title: PLANNING DIRECTOR Date: 01 JULY 2015

**Alternative Preference Ranking Certification Form**

**Cooperating Agency or Tribe: Joint Base Lewis McChord**

**Agency or Tribal Authorized Official Preparing the Certification Form: Margaret Taaffe**

**Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.**

1. NNR Overhead or Underground Design Options
2. Alternative D
3. Alternative H

**Abstain**

**Rationale for Alternative Preference Ranking (please attach additional material if needed):**

The NNR Overhead or Underground Design Options were identified as preferred alternatives because either route could be supported by the Army based on mission impacts as long as a mitigation plan is developed which results in a net conservation benefit to sage grouse.

JBLM supported Alternative D in the original DEIS because direct impacts to the mission were deemed to be minimal. This alternative remains acceptable to JBLM.

Alternative H is acceptable to JBLM because there would be no direct mission impacts.

I certify that the above information and any additional supporting rationale provided represents the

Official Alternative Preference Ranking of Joint Base Lewis McChord for the  
(Cooperating Agency or Tribe)

Proposed Vantage to Pomona Heights 230kV Transmission Line Project.

Signature: H. Charles Hodges, Jr. Printed Name: H. Charles Hodges, Jr.  
(Authorized Official)  
Commanding

Title: Colonel, US Army, Commanding Date: June 19, 2015

**Alternative Preference Ranking Certification Form**

**Cooperating Agency or Tribe:** Kittitas County

**Agency or Tribal Authorized Official Preparing the Certification Form:**

Robert 'Doc' Hansen, Interim CDS Director

**Alternative Preference Ranking.** From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.

1. Alternative D

3. Alternative A

2. Alternative C

4. NNR Alternative – Underground Design

**Abstain**

**Rationale for Alternative Preference Ranking (please attach additional material if needed):**

Kittitas County based its alternative preference rankings on a systematic review approach. First, the Optional Ranking Worksheet was used in conjunction with the Alternative Summary matrix for Resource/Issue Impacts by Action Alternative. After the general ranking was complete, we looked more in-depth into some of the following categories/issues: Sage-Grouse habitat, ownership (public/private), visual impacts, impact to interstates and highways, cultural resources, and construction costs. This evaluation led to the County ranking our top four preferences as follows: 1) Alternative D (preferred alternative), 2) Alternative C, 3) Alternative A, and 4) NNR Alternative – Underground Design. Based on the first round of the ranking worksheet, NNR Alternative – Overhead Design was the 4<sup>th</sup> preferred alternative. However, after more detailed review, Kittitas County recommends that if one of the NNR Alternatives is chosen, the underground design is the most suitable to the environment (mainly allowing for a more suitable Sage-Grouse habitat area) and the surrounding property owners by lowering the visual impacts in the area. For these reasons, the NNR Alternative – Underground Design was ultimately chosen as the 4<sup>th</sup> preferred alternative.

**(Please see Page 2)**

I certify that the above information and any additional supporting rationale provided represents the

Official Alternative Preference Ranking of Kittitas County for the  
(Cooperating Agency or Tribe)

Proposed Vantage to Pomona Heights 230kV Transmission Line Project.

Signature:  Printed Name: Robert 'Doc' Hansen  
(Authorized Official)

Title: Interim CDS Director Date: June 30, 2015

When scrutinizing the issues/categories listed above we came to the following conclusions. The Sage-Grouse population and their ability to re-populate their historic habitat, especially to the western area of the proposed project area is important to the Shrub Steppe environment of Central Washington. Kittitas County is also concerned with the impact to private property of this proposal and believes that the infrastructure should be located on federal lands as much as possible. Additionally, the number of private property owners involved in each alternative were considered and not just the acreage amount. Visual impacts and agriculture lands were also of concern for Kittitas County. In particular, it is important to Kittitas County that irrigated agriculture lands are not impeded by transmission lines that may affect the usefulness of land and the irrigation systems. Crossing I-82 is also an obstacle that Kittitas County believes can and should be avoided for ease of traffic flow and public safety. Therefore three of the four preferred alternatives recommended by Kittitas County do not require transmission lines to cross the interstate. Based on the information reviewed by Kittitas County it also appears that there is the potential of numerous archaeological sites in the general vicinity of all proposed alternatives except for the no action alternative. We recognize that there are ways to preserve historical archaeological sites and believe that routes with the least known sites should be considered first. Finally, Kittitas County recognizes that Pacific Power and it's rate payers will share the brunt of the cost of installation of the additional 230kV transmission line therefore cost is a large factor in route selection and must be weighed heavily against other factors of development.

Kittitas County would also like to point out that we are the only county jurisdiction that requires land use permits for this activity outside of SEPA compliance. This is a lengthy public process (at best estimate today it could take anywhere between 6 to 12 months) with no guarantee of approval.

Based on the rationale given above, Kittitas County recommends the four preferred alternatives as follows:

- 1) Alternative D
- 2) Alternative C
- 3) Alternative A
- 4) NNR Alternative – Underground Design

Alternative Preference Ranking Certification Form

<b>Cooperating Agency or Tribe: United States Fish and Wildlife Service</b>	
<b>Agency or Tribal Authorized Official Preparing the Certification Form: Jessica L. Gonzales</b>	
<b>Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.</b>	
<b>1. No Action Alternative</b>	<b>3. NNR (Overhead)</b>
<b>2. NNR (Underground)</b>	<b>4. NNR with Manastash Ridge Subroute (Overhead)</b>
<b>Abstain</b>	
<b>Rationale for Alternative Preference Ranking (please attach additional material if needed):</b> The U.S. Fish and Wildlife Service's top four Preferred Alternatives, in order of preference, and in our estimation, represent the best opportunities to minimize the effect of the Project on sage-grouse in the JBLM YTC PAC:	
<b><u>No Action Alternative</u></b>	
<ul style="list-style-type: none"><li>• This alternative ensures no additional transmission infrastructure or associated negative effects would be located near the JBLM YTC PAC</li><li>• This alternative is the only alternative wholly outside the JBLM YTC PAC; thereby it keeps within the COT Report guidance for energy development within the sage-grouse PACs.</li><li>• No additive direct and indirect impacts to sage-grouse would result from the implementation of this alternative.</li></ul>	
<b><u>NNR - With Underground Design Option</u></b>	
<ul style="list-style-type: none"><li>• Habitat connectivity between north and south sage-grouse populations is promoted through the implementation of this alternative by realizing the first opportunity to reduce a transmission line barrier in the JBLM YTC PAC.</li><li>• This alternative is one of the shortest routes of those proposed and would minimize the footprint and direct/indirect impacts of the proposed Project on the shrub steppe landscape.</li></ul>	
<b><u>NNR - With Overhead Design Option</u></b>	
<ul style="list-style-type: none"><li>• This alternative does not contain underground options, but places infrastructure farthest away from sage-grouse concentrations in the southern part of the JBLM YTC PAC.</li><li>• This alternative is one of the shortest of the NNR alternatives and results in a lower level of indirect impacts to sage-grouse and its habitat.</li></ul>	
<b><u>NNR - Manastash Ridge Subroute with Overhead Design Option</u></b>	
<ul style="list-style-type: none"><li>• This alternative does not contain underground options, but places infrastructure farthest away from sage-grouse concentrations in the southern part of the JBLM YTC PAC.</li><li>• It moves infrastructure farther from historic leks in the Badger Pocket/Manastash Ridge area.</li><li>• It results in a lower level of indirect impacts to sage-grouse and its habitat than the remaining alternatives.</li></ul>	

I certify that the above information and any additional supporting rationale provided represents the Official Alternative Preference Ranking of the U.S. Fish and Wildlife Service for the proposed Vantage to Pomona Heights 230kV Transmission Line Project.

(Cooperating Agency or Tribe)

Signature:   
(Authorized Official)  
Title: WA State Supervisor

Printed Name: Eric V. Rickerson  
Date: 6/30/15

**Alternative Preference Ranking Certification Form**

**Cooperating Agency or Tribe: Washington Department of Fish and Wildlife**

**Agency or Tribal Authorized Official Preparing the Certification Form: Michael Livingston**

**Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.**

**1. Modified DEIS Agency Preferred Alternative D (with strategic undergrounding at two locations along the 2c and alignment modification near southwest quadrant of the YTC)**

**2. SDEIS NNR – Underground Design Option**

**3. Modified DEIS Agency Preferred Alternative D (with alignment modification near southwest quadrant of the YTC)**

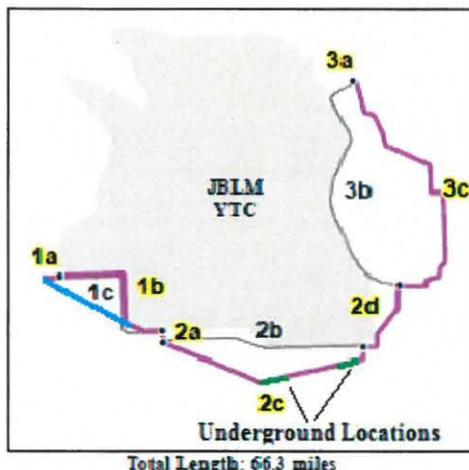
**4. No Action Alternative**

**Abstain**

**Rationale for Alternative Preference Ranking (please attach additional material if needed):**

**1.**

**Modified DEIS Agency Preferred Alternative D  
Includes undergrounding at two locations along  
the southern segment 2c, and alignment  
modification near southwest quadrant of the YTC**



**Justification/Rationale:**

1. Though not fully avoiding or minimizing potential direct and indirect effects on the Yakima Training Center Priority Area for Conservation (PAC), route avoids adverse impacts to ecological connectivity and sage grouse movement between the PAC and existing protected state Wenas Wildlife Area and other public lands to the west. Complements the existing state investments in wildlife conservation to the west of the PAC including sage grouse.
2. Avoids adverse impacts to known and existing sage grouse travel corridors from the PAC to the west to habitat on private and state lands. Evidence that the sage grouse already use this route to and from nesting areas.
3. No effect on permeability of current and future movement of sage grouse to the northern end of the Yakima Training Center PAC.
4. By avoiding impacts to connectivity and sage grouse movement to the west of the PAC, protects future opportunity and investments for sage grouse habitat protection and enhancement on the private property to the west. This property is under review for protection as part of the Yakima Basin Integrated Plan in collaboration with the U.S. Bureau of Land Management. Prevents impairment of effectiveness of this property to the west in sage grouse recovery efforts.
5. By not co-locating in the YTC PAC, better preserves opportunity for future re-route or burial of the existing Pacific Power transmission line across the northern Yakima Training Center.
6. In comparison to the SDEIS alternatives, locates the line (and thus the associated direct and indirect effects of the line) where protection of habitat south of the Yakima Training Center is less certain in the near future and where higher risks of conversion are located, yet maintains opportunity for southern movement by discrete undergrounding of the transmission lines at strategic locations where shrub-steppe habitat connectivity already exists along southern segment 2c (even with existing transmission to the south of YTC). An overhead-only option would increase effect on permeability.
7. Alters the route of the transmission line at the southwestern corner of the YTC boundary. Strategically siting the transmission line further from occupied sage grouse habitat on the YTC

to avoid effects.

8. Avoids habitat-related issues along the Columbia River and spans already altered habitat along the eastern-most segment of the alternative.
9. Is the alternative that meets the goals of Pacific Power yet will also most likely to lead to long-term recovery, sustainability, and net-benefit of the Yakima Training Center sage grouse PAC, as it does not impair the northern or westerly movement of sage grouse while preserves permeability to habitat in the south (Rattlesnake Hills and Yakama Nation Priority Area for Conservation).
10. **ADDITIONAL DESIGN FEATURE MODIFICATION:** Where this alternative is co-located with existing transmission lines, a similar exemption from WECC proximity standards as that attained for the New Northern Route should be attained, as that would further reduce indirect effects and permeability impacts of the alternative, while also reducing the mitigation obligation of the applicant. Strategic micro-siting concepts specific for sage grouse discussed on sage-grouse subgroup field tour on May 12th, 2015 should be incorporated.

## **2. SDEIS NNR – Underground Design Option**

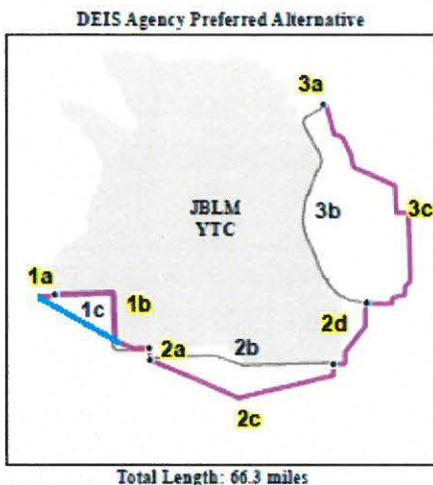
### Justification/Rationale:

1. Of the alternatives under consideration that are also likely to satisfy the original goals of the applicant, the underground design option is the only NNR alternative that can reasonably satisfy the principles of the mitigation hierarchy for sage grouse impacts and reasonably avoid the impacts to PAC connectivity and permeability and create the potential for net-benefit through mitigation.
2. Though not avoiding the YTC PAC, strategic undergrounded segments in this option would likely minimize indirect effects by minimizing adverse impacts to ecological connectivity and sage grouse movement between the PAC and existing protected state Wenas Wildlife Area and other public lands to the west. Complements the existing state investments in wildlife conservation to the west of the PAC including sage grouse. Also would minimize adverse impacts to known and existing sage grouse travel corridors from the PAC to the west to habitat on private and state lands. Evidence that the sage grouse already use this route to and from nesting areas. Minimizes the effect on permeability of current and future movement of sage grouse to the northern end of the YTC PAC and beyond.
3. By minimizing adverse effects to connectivity and sage grouse movement to the west of the PAC, better protects future opportunity and investments for sage grouse habitat protection and enhancement on the private property to the west than the other NNR design options. This property is under review for protection as part of the Yakima Basin Integrated Plan in collaboration with the U.S. Bureau of Land Management. Prevents impairment of effectiveness of this property to the west in sage grouse recovery efforts.
4. The underground design option is the only NNR design option that supports the opportunity for meaningful future re-route or burial of segments of the existing Pacific Power transmission line across the northern Yakima Training Center. Co-location above ground through the YTC would decrease the benefit of a future conservation action on the existing line.
5. As compared with other NNR design option, significantly decreases anticipated compensatory mitigation obligation of the applicant by reducing the indirect effects on sage-grouse and the adverse effects on connectivity of the proposed transmission line.
6. **ADDITIONAL DESIGN FEATURE MODIFICATION:** Where possible, burial under the existing road with modifications would likely reduce direct adverse effects of burial and potentially minimize effects on cultural resources, though that is yet to be analyzed. Strategic micro-siting concepts

specific for sage grouse discussed on sage-grouse subgroup field tour on May 12th, 2015 should be incorporated, though it seems unlikely that significant opportunities exist for micro-siting that satisfies the needs of the YTC that would make any real contribution to minimizing the adverse effects on sage-grouse.

3.

**Alternative D with modification in Southwest quadrant of the Yakima Training Center**



**Justification/Rationale:**

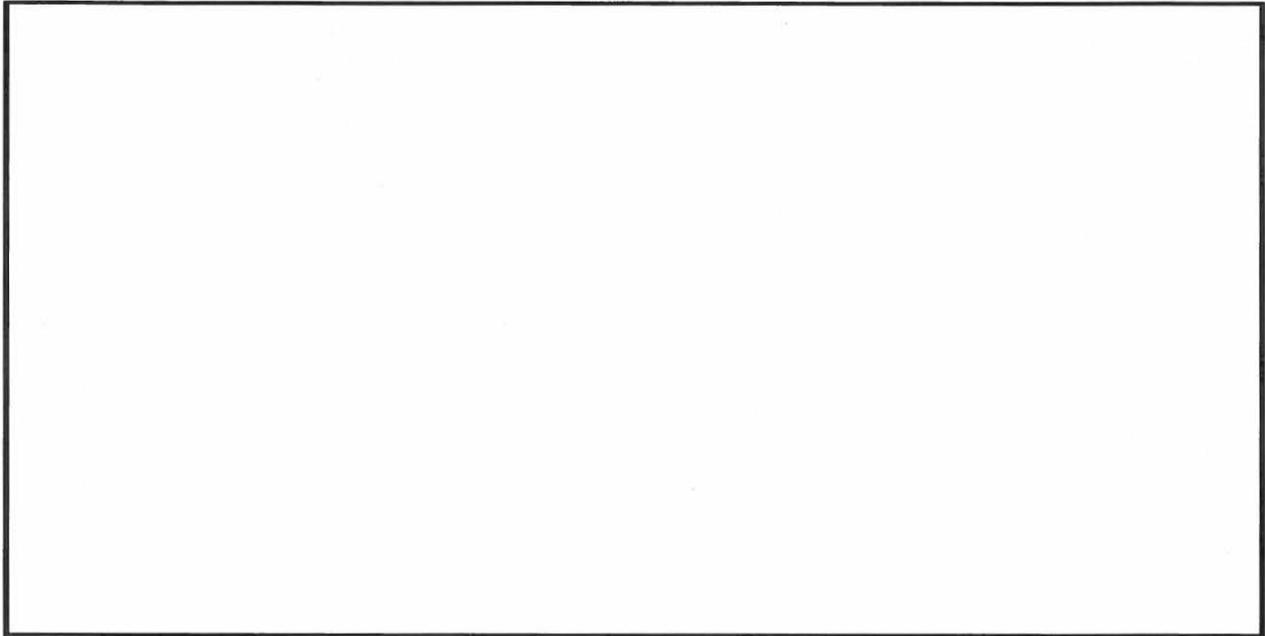
1. Though not fully avoiding or minimizing potential direct and indirect effects on the Yakima Training Center Priority Area for Conservation (PAC), route avoids adverse impacts to ecological connectivity and sage grouse movement between the PAC and existing protected state Wenas Wildlife Area and other public lands to the west. Complements the existing state investments in wildlife conservation to the west of the PAC including sage grouse.
2. Avoids adverse impacts to known and existing sage grouse travel corridors from the PAC to the west to habitat on private and state lands. Evidence that the sage grouse already use this route to and from nesting areas.
3. No effect on permeability of current and future movement of sage grouse to the northern end of the Yakima Training Center PAC.
4. By avoiding impacts to connectivity and sage grouse movement to the west of the PAC, protects future opportunity and investments for sage grouse habitat protection and enhancement on the private property to the west. This property is under review for protection as part of the Yakima Basin Integrated Plan in collaboration with the U.S. Bureau of Land Management. Prevents impairment of effectiveness of this property to the west in sage grouse recovery efforts.
5. By not co-locating in the YTC PAC, better preserves opportunity for future re-route or burial of the existing Pacific Power transmission line across the northern Yakima Training Center.
6. In comparison to the SDEIS alternatives, locates the line (and thus the associated direct and indirect effects of the line) where protection of habitat south of the Yakima Training Center is less certain in the near future and where higher risks of conversion are located.

7. Alters the route of the transmission line at the southwestern corner of the YTC boundary. Strategically siting the transmission line further from occupied sage grouse habitat on the YTC to avoid effects.
8. Avoids habitat-related issues along the Columbia River and spans already altered habitat along the eastern-most segment of the alternative.
9. Overhead lines co-located with existing line will increase the effect on sage-grouse permeability to habitat in the south (Rattlesnake Hills and Yakama Nation PAC), specifically at strategic locations where shrub-steppe habitat connectivity already exists along southern segment 2c.
10. ADDITIONAL DESIGN FEATURE MODIFICATION: Where this alternative is co-located with existing transmission lines, a similar exemption from WECC proximity standards as that attained for the New Northern Route should be attained, as that would further reduce indirect effects and permeability impacts of the alternative, while also reducing the mitigation obligation of the applicant. Strategic micro-siting concepts specific for sage grouse discussed on sage-grouse subgroup field tour on May 12th, 2015 should be incorporated.

#### **4. No Action Alternative**

##### Justification/Rationale:

1. The Conservation Objectives Team (COT) Report, supported by the State of Washington, identified Priority Areas for Conservation as key habitats necessary for sage-grouse conservation and maintaining sage-grouse representation, redundancy, and resilience. To do so, the COT report advocates stopping the bleeding of habitat loss by implementing an avoidance first strategy that effectively conserves all current PACs. The COT Report further highlights the limited potential for success in restoring habitat to the quality of habitat currently in PACs. WDFW sees PACs as instrumental to recovery.
2. There is no alternative available for consideration that avoids impacts to the YTC PAC completely (requiring new starting and ending points), or that at a minimum avoids impacts to the PAC to the maximum extent possible in light of the starting and ending substations for the transmission line are at the outer edges of the PAC.
3. With a robust and defensible Habitat Mitigation Framework and associated plan, the three route alternatives above (in their modified forms where identified) may be able to achieve no-net-loss for sage grouse and meet the goals of the applicant. The other remaining alternatives are likely to have adverse effects on sage-grouse and PAC habitat that cannot be mitigated to a net-benefit standard.



I certify that the above information and any additional supporting rationale provided represents the Official Alternative Preference Ranking of Washington Department of Fish and Wildlife for the Proposed Vantage to Pomona Heights 230kV Transmission Line Project.  
(Cooperating Agency or Tribe)

(Authorized Official)



Signature: \_\_\_\_\_ Printed Name: Mike Livingston

Title: WDFW Region 3 Director Date: 07/01/15



Linda Coates-Markle  
BLM Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, WA 98801-1521  
[lcmarkle@blm.gov](mailto:lcmarkle@blm.gov)

Dear Ms. Coates-Markle:

Please accept this letter as the Official Alternative Preference for the Washington Department of Natural Resources (DNR) on the proposed Vantage to Pomona Heights 230kv Transmission Line Project.

Washington is a land grant state entrusted with caring for state trust lands to benefit state institutions since statehood. With the state as trustee, the Legislature has designated DNR as manager of the state trust lands to support schools and other specific beneficiaries. Originally trust lands were primarily viewed solely as a source of revenue, but as Washington State has experienced growth, these lands have become important to the state's ecological health as well as for the recreational opportunities they provide. To further conservation of important ecological functions in 1972 DNR was tasked with identifying, creating and managing the state's Natural Area Preserves, and in 1987 Natural Resource Conservation Areas. These now include more than 150,000 acres of the most ecologically unique and important lands to the state.

After careful review of the various alternative routes for impacts to revenue generation, ecological function, and recreational activities DNR has determined that Alternative D, the DEIS Agency Preferred Alternative, would result in the least impact to state managed trust lands. DNR has particular concern with the NNR Alternative and its potential impacts to its trust land management mandates on both revenue generating state trust lands and Natural Area Preserves.

### **DEIS Agency Preferred Alternative**

*DEIS Agency Preferred Alternative minimizes impacts to state trust lands*

DNR's management of revenue producing state trust lands provide millions of dollars in necessary funds for construction of public schools, universities, prisons, and other state institutions, as well as for county services such as libraries, firefighting, and hospitals. Revenue producing activities include sustainable management of timber and other forest products, leasing on agricultural lands (for orchards, vineyards, dry row crops, and grazing), mineral leases, wind power leases, and communication sites. Permanent easements for utility lines remove state trust lands from production and sever lands, resulting in lower value, restrictions on future land use, and limited productivity. DNR prefers that any easement granted on state trust lands minimizes these impacts that reduce opportunities for recreation, revenue, and future management of land at its highest and best use.

DNR commented on the original project proposal by a letter dated March 8, 2010 and through a follow-up site meeting at a vineyard that would have been impacted by the original proposed siting. The January 4, 2013 DEIS and the DEIS Agency Preferred Alternative addressed DNR's concerns of the March 8, 2010 letter and subsequent meeting by siting the project area on DNR lands adjacent to existing utility lines, and relocating lines that would impact DNR's vineyard to Bureau of Reclamation lands adjacent to DNR ownership. As such the DEIS Agency Preferred Alternative has already taken steps to minimize impacts to state trust lands, and therefore would prove the least burdensome alternative.

*DEIS Agency Preferred Alternative minimizes impacts to Selah Cliffs Natural Area Preserve*

This route avoids impacts to Selah Cliffs Natural Area Preserve; it does not intersect with the preserve or any known occurrences of the ecological features of interest for which the preserve was identified and designated.

**NNR Alternative**

*Impacts to the Selah Cliffs Natural Area Preserve*

This route intersects with the Selah Cliffs Natural Area Preserve (NAP) and adjacent lands. The route spans the cliffs that are the essential habitat for the basalt daisy (*Erigeron basalticus*), a species that is globally extremely rare. The basalt daisy is the primary feature of conservation interest within the NAP. There is also some raptor use, including nesting, that occurs along the cliffs within the NAP. Any physical disturbance to the basalt cliffs during construction of the transmission line would pose a risk to the basalt daisy and potentially to raptor use of the site.

*Manastash Ridge Subroute*

The proposed Manastash Ridge Subroute crosses three parcels of DNR managed state trust lands used to produce revenue for the Common School Trust. The Subroute bisects the Common School Trust lands providing a substantial burden to the trusts and limiting DNR's ability to effectively manage the land. Bisecting parcels in this manner limits productive use of the land, reduces the value of trust assets, and severely limits options for changes in land use management in the future. DNR is constitutionally mandated to manage state trust lands so as to manage in perpetuity and not benefit one generation over another. Allowing encumbrances that unnecessarily limit DNR's ability to manage lands in the future at their highest and best use is contrary to DNR's mandate.

Lands on the proposed Manastash Ridge Subroute are also home to the sage thrasher and the slack-tailed jackrabbit, both federal candidates for listing under the Endangered Species Act. Construction of lines and use of access roads poses risk of harm to wildlife and habitat.

Please contact me at (360) 902-2117, or [Rochelle.goss@dnr.wa.gov](mailto:Rochelle.goss@dnr.wa.gov) if you have any questions.

Rochelle Goss  
SEPA Program Lead

**Alternative Preference Ranking Certification Form**

<b>Cooperating Agency or Tribe: Washington State Department of Transportation</b>	
<b>Agency or Tribal Authorized Official Preparing the Certification Form:</b>	
<input type="checkbox"/> <b>Alternative Preference Ranking. From the eight DEIS Action Alternatives, the one SDEIS Alternative (with three options: NNR Overhead Design Option, NNR Underground Design Option, and NNR with Manastash Ridge Subroute), and the No Action Alternative (12 options total), please identify your Agency's or Tribe's top four Preferred Alternatives, with 1 being your Agency's or Tribe's most Preferred Alternative.</b>	
1. _____	3. _____
2. _____	4. _____
<input type="checkbox"/> <b>Abstain</b>	
<b>Rationale for Alternative Preference Ranking (please attach additional material if needed):</b>	
WSDOT does not have a specific Alternative preference since WSDOT will issue utility permit(s) and/or franchise application(s); access permit(s); and easement(s) or lease(s).	

I certify that the above information and any additional supporting rationale provided represents the Official Alternative Preference Ranking of the **Washington State Department of Transportation** for the Proposed Vantage to Pomona Heights 230kV Transmission Line Project.

Signature:  Printed Name: William M. Sauriol  
(Authorized Official)

Title: South Central Region Environmental Manager Date: June 30, 2015



## **Vantage – Pomona Heights 230kV Transmission Line Project**

### **Yakima County Preferred Alternative Selection Rationale**

1. NNR Underground – Yakima County staff has chosen NNR Underground as the preferred alternative. The NNR Underground route is the shortest route and has the least amount of impact to private property while allowing for WDFW concerns related to Greater Sage Grouse to be mitigated.
2. NNR Overhead – This is the second most favorable route, as it is the shortest and has the least impact to private property. It is ranked second because of the potential impacts to Greater Sage Grouse.
3. NNR Manastash Ridge Subroute – The NNR Manastash Ridge Subroute has the second shortest route and avoids impacts private property more so than the remaining alternatives.
4. Alternative B – Alternative B has the least amount of impact to private property and agricultural practices.

# **APPENDIX H UNDERGROUNDING REPORT**

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**Vantage to Pomona Heights 230 kV  
Transmission Line Project**  
*Undergrounding Transmission Line Technical Report*

November 11, 2013

*PREPARED FOR: Bureau of Land Management*

*PREPARED BY: POWER Engineers, Inc.*



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## LIST OF ACRONYMS AND ABBREVIATIONS

ACRONYM / ABBREVIATION	DEFINITION
APLIC	Avian Power Line Interaction Committee
BLM	Bureau of Land Management
EPRI	Electric Power Research Institute
GIL	Gas insulated line
HPFF	high pressure fluid filled
HTS	high temperature superconductors
kV	kilovolt
LPP	laminated polypropylene paper
POWER	POWER Engineers
PVC	polyvinyl chloride
ROW	right-of-way
SCFF	self-contained fluid filled
SDEIS	supplemental draft environmental impact statement
USFWS	U.S. Fish and Wildlife Service
WPSC	Wisconsin Public Service Commission
XLPE	solid dielectric cross-linked polyethylene

## 1.0 BACKGROUND AND PURPOSE OF THE TECHNICAL REPORT

The purpose of this Technical Report is to provide information to the U.S. Bureau of Land Management (BLM; and other agencies with interest in the Vantage-Pomona Heights 230 kilovolt [kV] Transmission Line Project) on the process, requirements, and technical aspects of undergrounding high voltage transmission lines and report on what studies, literature and other National Environmental Policy Act documents state about the comparative environmental impacts of underground versus overhead construction. This Technical Report provides information to assist BLM's evaluation of the potential impacts that undergrounding may have on the suite of resources analyzed in the Supplemental Draft Environmental Impact Statement (SDEIS) and to aid in a decision about the level of analysis that will be included in the SDEIS.

The contents of this Technical Report consist of the following:

- Underground construction components and construction technologies and techniques (Electric Power Research Institute [EPRI] 2008).
- Environmental impacts associated with underground construction (EPRI 2008).
- Avian Power Line Interaction Committee (APLIC; APLIC 2012) report addressing undergrounding of transmission lines.
- Current 230 kV underground transmission facilities in operation in the United States.
- Pacific Power input regarding undergrounding high voltage transmission lines.
- Joint-Base Lewis McCord Yakima Training Center/Army Corps of Engineers input regarding underground transmission on the installation.
- Comparison of underground and overhead environmental impacts (EPRI 2008).
- Comparison of ground disturbance and potential impacts of overhead and underground transmission lines pertaining to the Vantage-Pomona Heights 230 kV Transmission Project.
- Review of how recent 230 kV transmission line EIS's addressed transmission line undergrounding in areas with sage-grouse habitat.

## 2.0 MAJOR SOURCES OF INFORMATION

Information in this Technical Report is compiled from the Electric Power Research Institute (EPRI) Report on the Assessment of Current Underground and Overhead Transmission Line Construction and Maintenance in the United States (EPRI 2008). EPRI is an independent non-profit organization that brings scientists, engineers, academia and industry together to conduct research, development and demonstration relating to the generation, delivery and use of electricity. EPRI applies stringent standards of objectivity through their advisory structure and by recruiting independent researchers and technical authorities from around the world.

Information is also included from the Avian Power Line Interaction Committee (APLIC) report on Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2012). APLIC membership includes over 50 utilities, Edison Electric Institute, U.S. Fish and Wildlife Service (USFWS), EPRI, National Rural Electrical Cooperative Association, and Rural Utilities Service. A portion of this APLIC report addresses burying of power lines. The USFWS collaborated with APLIC in the preparation of the report and endorsed its findings.

This Technical Report also includes information that was provided in the Vantage to Pomona Heights 230 kV Transmission Line Project Alternatives Considered and Eliminated Draft Technical Report (POWER Engineers [POWER] 2010). The Alternatives Considered and Eliminated Draft Technical Report was

provided to Karen Kelleher (former BLM Field Office Manager) and Molly Cobbs (former BLM Project Manager). The discussion included in the Draft Environmental Impact Statement was a condensed version of the information presented in that Technical Report.

## **3.0 UNDERGROUND CONSTRUCTION COMPONENTS AND CONSTRUCTION TECHNOLOGIES AND TECHNIQUES**

### **3.1 Introduction**

High voltage underground transmission lines have markedly different technological requirements than lower voltage underground distribution lines. Underground high voltage transmission lines require extensive cooling systems to dissipate the heat generated by the transmission of bulk electricity. The extremely high cost of large cooling systems and other special design requirements limits the application of underground transmission systems for long distance electric transmission. Overhead conductors are cooled by the open air surrounding them. Placing the conductors on towers puts these conduits of energy above most human activity on the ground in a transmission corridor and deals effectively with the issue of heat (POWER 2010).

### **3.2 Open Cut Trenching**

The EPRI Report (2008) presents the following information on open cut trenching:

Open cut trenching, the most widely used method of installation for underground transmission lines, primarily utilizes mechanized digging equipment to create a trench with given dimensions per the design. With any trenching activity, Occupational Safety and Health Administration Standards (sometimes state and local law) govern the working area. Sheet piling and shoring are often required to mitigate any safety concerns for personnel as well as equipment. Dewatering is performed in any area where groundwater will be encountered, and stormwater prevention plans are implemented to reduce any hazards caused by excess water within the work area. Examples of open cut trench construction are shown in Figures 1 and 2.

Upon completion of excavation, the bottom of the trench is set to design grade where the cable system will be constructed. Depending on the type of cable system, pipes or conduit are positioned within the trench utilizing spacers or other means of mechanical stability to ensure the cable system maintains the correct dimensions while being backfilled. Often times, manholes are placed within the system to allow for routine maintenance and cable installation. Because excess heat can be a detrimental factor to underground cable systems, select backfills are obtained with low thermal resistivities to allow for efficient dissipation of heat from the system. In most instances these backfills can be created and tested at a local batch plant.



**Figure 1** Open Cut Trenching (EPRI photo)



**Figure 2** Underground Cable Construction Right-of-Way with Single Cable Open Trench

### **3.3 Underground Vaults**

Large concrete vaults buried at regular intervals are required for underground construction. The primary function of the vault is for splicing the cables during construction and for permanent access, maintenance and repair of cables. Two parallel underground vaults, approximately 12 feet wide by 28 feet long by 12 feet deep are required approximately every 1,500 feet. Figure 3 shows typical underground vault installation.



**Figure 3 Typical Underground Vault Installation (EPRI Photo)**

### **3.4 Underground Cable Technologies**

There are four basic underground cable technologies for underground circuits:

- Solid Dielectric (Cross-Linked Polyethylene or XLPE)
- Gas Insulated Transmission Line (GIL)
- Pipe-type (Fluid Filled or HPFF)
- Self-Contained Fluid Filled (SCFF)

#### **3.4.1 Solid Dielectric Cable**

The components of a typical solid dielectric cable and an overhead conductor are shown in Figures 4 and 5. The typical cable consists of a stranded copper or aluminum conductor, semi-conducting extruded conductor shield, extruded dielectric insulation, extruded semiconducting insulation shield, a lead, aluminum, copper or stainless steel sheath moisture barrier, and a protective jacket. A metallic shield, tape or drainwire, is required to carry fault current when a sheath is not used. Newer cable technology uses a high voltage extruded dielectric insulation of XLPE. Applications of XPLE are limited to short transmission lines. Generally, solid dielectric technologies are used for lower voltage underground transmission that carries less current (POWER 2010).

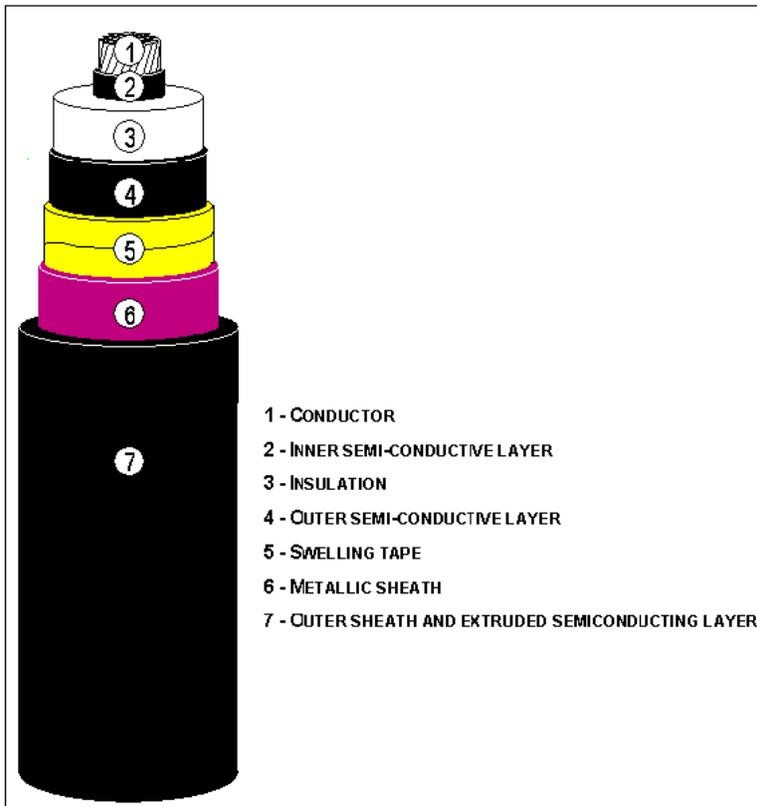


Figure 4 Solid Dielectric Cable (EPRI photo)



Figure 5 Solid Dielectric Underground Cable and Smaller Overhead Conductor (Georgia Transmission Company photo)

### **3.4.2 Gas Insulated Transmission Line**

Gas Insulated Line (GIL) technology at 230 kV and higher voltage levels has been implemented primarily within substations and not for longer transmission lines. GIL has been incorporated into substation designs with the length typically limited to distances less than 1,000 feet. The high cost and lack of experience with respect to longer underground transmission lines, and questions of reliability are more of a concern that other more prominent cable technologies (POWER 2010).

### **3.4.3 High Pressure Fluid Filled Cable**

High pressure fluid-filled (HPFF) cable systems are a pipe-type system where three single phase cables are located within a single steel pipe (Figure 6). HPFF cables use Kraft paper insulation or a laminated polypropylene paper (LPP) insulation that is impregnated with dielectric fluid to minimize the insulation breakdown under electrical stress. Since the system requires a continuous high pressure, pumping plants are required every 7 to 10 miles along the route, assuming a relatively flat topography. The pumping plants are responsible for maintaining a constant pressure on the system, but must have large reserve tanks to facilitate the expansion and contraction of the dielectric fluid as the system undergoes thermal cycling. To maintain an operable pipe-type system, cathodic protection must be applied to the cable pipes to mitigate corrosion. This in turn helps prevent fluid leaks which pose both an operational and an environmental concern. If a loss of coolant fluids were to occur it would result in environmentally hazardous coolant materials contaminating the surrounding soil. A coolant fluid leak can be caused by several means including thermal expansion and contraction of the cable due to power cycling, ground movement, splice breakage, termination movement, improper installation and a cable fault. The fluid is under pressure, so if a leak occurs, it can spread. Using an HPFF system does provide high reliability, but requires additional equipment, resulting in additional opportunity for component failure, while specially trained personnel are required to maintain these systems (POWER 2010).



**Figure 6** HPFF Pipe Installation

#### **3.4.4 Self Contained Fluid Filled Cable**

Self-contained fluid filled (SCFF) cable systems are very similar to the HPFF systems. The cable is typically constructed around a hollow tube, used for fluid circulation, and uses the same Kraft paper or LPP insulation materials. Because the fluid system is “self-contained” the volume of fluid required is significantly less, however, the same distribution of pumping plants would be required. While SCFF cable systems have the longest running history at the extra high voltage levels, their use is typically limited to long submarine cable installations (POWER 2010).

#### **3.4.5 Superconducting Cables**

Research is currently underway in the advancement of high temperature superconductors (HTS). Utilizing a unique cable design where all three phases are centered concentrically on a single core, the cables are capable of displaying low electric losses with the same power transfer capabilities as compared with a standard non-superconducting cable. The core, filled with a cryogenic fluid, super cools the conducting material resulting in extremely low losses and high electrical power transfer capacities. Most HTS systems are located adjacent to large metropolitan areas, where they are capable of transferring large quantities of power a few thousand feet, at the distribution line level (34.5 to 12 kV). However, technological advances in the last few years have seen the first 138 kV system installed in Long Island, New York in early 2008. Because HTS systems have not been established at the 230 kV or 500 kV voltage levels, superconducting cable would not be a technology option (POWER 2010).

### **3.5 Reactive Power Compensation-Maintaining Stable Power Flow**

The characteristics of the underground cable insulating material and the close proximity of the cables to one another results in the cable system introducing high reactive loads (voltage rise) onto the electrical system that affect safe and reliable power flow. These reactive loads would have to be offset with above ground compensation stations located every 7 to 20 miles to maintain stable power flow along the transmission line route. The additional equipment translates to a higher overall cost, limits the length on underground installation and increases the likelihood of failure due to additional components (Xcel Energy Inc. 2011). A further consideration is that the electrical system as a whole may or may not be capable of reliably accommodating these very significant reactive power loads, making the integration of long underground alternating current power lines into the overall power grid questionable or infeasible (POWER 2010).

### **3.6 Design Considerations**

The following are key considerations for underground transmission line design of a 230 kV cable system (POWER 2010):

- A 230 kV cable system would consist of multiple cables per phase to achieve the target power transfer requirements and to provide redundancy in the case of a cable failure.
- Concrete encased duct banks would be installed at a minimum cover depth of three feet, or as required by routing design, and would be backfilled with specially engineered thermally favorable backfill to assist in heat dissipation.
- To obtain further redundancy, multiple duct banks per circuit are required to minimize same mode failures of the systems.
- Depending upon installation location, a permanent access road approximately 14 feet in width would be required to perform operation and maintenance activities.
- The total construction surface impact of the underground cable system would at a minimum be approximately 55 to 60 feet, plus any permanent access roads.
- Splicing of the cable would be required approximately every 1,500. Splicing would be performed inside large underground vault structures. Vault dimensions would be approximately 12 feet wide

by 28 feet long by 12 feet high, depending upon the cable manufacturer splice and cable racking requirements.

- Depending on the terrain characteristics, burial depths may need to be increased to avoid heating the soil and changing the conditions of the vegetation and wildlife habitat above the duct bank or pipe type cables.
- Underground to overhead transition stations would be required at each end of the underground transmission line segment, and at each intermediate reactive compensation stations. Each transition station would require between 1 to 2 acres, with each site consisting of pedestal type termination structures and reactors (similar to a large power transformer in appearance; Figure 7). In addition to these structures, A-frame dead-end structures, approximately 80 feet tall, would be required at each end of the system.



**Figure 7 Transition Station and Structures (Wisconsin Public Service Commission photo)**

### **3.7 Reliability and Maintenance**

The EPRI Report (2008) provides the following information on reliability and maintenance of underground transmission lines.

“Electric reliability typically is measured by 1) the frequency with which customers experience a power outage, and 2) the duration of the power outage. Overhead and underground outage comparison data demonstrates that the frequency of outages associated with underground systems typically is less than for overhead systems. However, the duration of an underground outage can be substantially longer than an overhead-related outage. Underground transmission facilities can be more difficult to troubleshoot than overhead facilities. It typically takes more time to locate and diagnose a problem, and perform repairs to an underground transmission line, lengthening the time the circuit is out of service. Repairs of failed underground lines can be quite costly as they

are time-intensive and can be more environmentally disruptive, depending on the underground system. Long-term reliability is also an issue. As overhead and underground facilities get older, they become less reliable. However, the lifespan of underground facilities is typically less than overhead facilities.”

While underground transmission lines are relatively immune to weather conditions, they are vulnerable to washouts, seismic events, cooling system failures, and inadvertent excavation. Other possible causes for cable failure include water intrusion into the cable, overheating of the cable, high voltage transients, thermal movement during load cycling and aging of the cable. The repair of high-voltage underground cable systems has relatively long outage times compared to repairs of traditional overhead lines. When a fault occurs the circuit is out of service and cannot be placed back into service until repair and test of the system is completed. Because the cable contains a central hollow duct in the conductor that carries cooling dielectric fluid, outage levels can be lengthy until fluid levels are restored. Qualified cable splicing personnel may be difficult to retain on short notice. It could take at least 5 to 10 days to mobilize qualified technicians and equipment to splice a failed cable. The estimated minimum outage duration for locating, excavating and repairing a single cable failure is estimated to be at least 20 days. Typically, failures in overhead lines can be located and repaired in a matter of hours. Long-term outages would be unacceptable for a circuit carrying bulk power. An underground conductor may last only 20 years, whereas an overhead line can last as long as 100 years (POWER 2010).

The Wisconsin Public Service Commission (WPSC), an independent regulatory agency, issued a report in 2011 titled *Underground Electric Transmission Lines* (WPSC 2011). The WPSC Report provides the following information on the reliability and maintenance of underground lines:

“The duration of outages for underground lines varies widely, depending on the circumstances of the failure, the availability of parts, and the skill level of the available repair personnel. The typical duration of a high pressure, gas-filled outage is 8 to 12 days. The duration of typical XLPE outages is 5 to 9 days. The repair of a fault in a HPFF system is estimated to be from 2 to 9 months, depending on the extent of the damage.

The outage rate would increase as the number of splices increases. However, the use of concrete vaults at splice locations can reduce the duration of a splice failure by allowing quick and clean access to the failure. The outage would be longer if the splice were directly buried, as is sometimes done with rural or suburban XLPE lines.

To locate a leak in a pipe-type line, the pipe pressure must be reduced below 60 pounds per square inch and the line de-energized before any probes are put into the pipe. For some leak probes, the line must be out of service for a day before the tests can begin. After repairs, pipe pressure must be returned to normal slowly. This would require an additional day or more before the repaired line could be energized.

To locate an electrical fault in an underground line, the affected cable must be identified. To repair a pipe-type line, the fluid on each side of the electrical failure would be frozen at least 25 feet out from the failure point. Then, the pipe would be opened and the line inspected. New splices are sometimes required and sometimes cable may need to be replaced and spliced. Then, the pipe would be thawed and the line would be re-pressurized, tested, and finally put back in service.

In contrast, a fault or break in an overhead line can usually be located almost immediately and repaired within hours or, at most, a day or two. One problem that increases emergency response time for underground transmission lines is that most of the suppliers of underground transmission

materials are in Europe. While some of the European companies keep American-based offices, cable and system supplies may not be immediately available for emergency repairs.”

### **3.8 Cost**

The construction costs of an underground a high voltage transmission line are many times more expensive than the cost of overhead construction. Depending on topography, costs for an underground lower voltage (69 kV to 138 kV) cable construction typically range from four to six times greater than construction of overhead lines. Costs of installed 230 kV underground cable systems are in the range of 10 to 20 times as much as overhead 230 kV (POWER 2010).

The Wisconsin Public Service Commission (WPSC 2011) states that:

“The estimated cost for constructing underground transmission lines ranges from 4 to 14 times more expensive than overhead lines of the same voltage and same distance. A typical new 69 kV overhead single-circuit transmission line costs approximately \$285,000 per mile as opposed to \$1.5 million per mile for a new 69 kV underground line (without the terminals). A new 138 kV overhead line costs approximately \$390,000 per mile as opposed to \$2 million per mile for underground (without the terminals).

These costs are determined by the local environment, the distances between splices and termination points, and the number of ancillary facilities required. Other issues that make underground transmission lines more costly are right-of-way access, start-up complications, construction limitations in urban areas, conflicts with other utilities, trenching construction issues, crossing natural or manmade barriers, and the potential need for forced cooling facilities. Other transmission facilities in or near the line may also require new or upgraded facilities to balance power issues such fault currents and voltage transients, all adding to the cost.

While it may be useful to sometimes compare the general cost differences between overhead and underground construction, the actual costs for underground may be quite different. Underground transmission construction can be very site-specific, especially for higher voltage lines. Components of underground transmission are often not interchangeable as they are for overhead. A complete in-depth study and characterization of the subsurface and electrical environment is necessary in order to get an accurate cost estimate for undergrounding a specific section of transmission. This can make the cost of underground transmission extremely variable when calculated on a per-mile basis.”

## **4.0 ENVIRONMENTAL IMPACTS ASSOCIATED WITH UNDERGROUND CONSTRUCTION**

The information presented in this section was taken from the EPRI Assessment of Environmental Effects of Current Underground and Overhead Transmission Line Construction and Maintenance in the United States (EPRI 2008). The environmental impacts of constructing an underground transmission line would be similar to those for major pipeline construction.

Resources typically affected by overhead and underground transmission line construction and maintenance activities include the following resources:

- Biological Resources (including vegetation and wildlife)
- Geological Resources and Soils

- Water Resources
- Cultural Resources
- Visual Resources

## 4.1 EPRI Assessment of Environmental Impacts Associated with Underground Construction

### 4.1.1 Vegetation Resources

According to EPRI (2008), impacts to vegetation resources from trenching and right-of-way (ROW) construction of an underground transmission line could result in the following:

- Disruption of existing vegetation:  
Trenching activities associated with underground transmission line construction disrupts the existing vegetation no matter what type of vegetation exists. Trenching can damage the root systems of existing trees to the extent that the trees are weakened or killed. A properly maintained underground ROW typically is kept clear of trees and large shrubs that can interfere with underground lines via plant root systems (WPSC 2011). Trees, shrubs, and most vegetation cannot be re-planted in the ROW of underground transmission lines; however, grass or similar vegetation may be used.
- Change in habitat type or vegetation composition:  
Changes in habitat type or vegetation composition can occur within the transmission line ROW, but results may vary significantly depending on the type of habitat being affected. Also, vegetation recovery rates will depend on soil type, landform, precipitation regime, and other physical features of the disturbed sites. Direct studies with regard to habitat and vegetation composition impacts due to construction of an underground transmission line are lacking. However, inferences can be made from studies referencing overhead transmission line projects and their associated impacts. More studies need to be conducted in this area, but a lack of native species recovery exists in certain ecosystems following severe disturbance such as trenching for an underground transmission line, as indicated in the following studies.

In the Mojave Desert, Lathrop and Archbold discovered that disturbed areas from transmission line construction and control areas may appear to have similar vegetation covers, biomasses, and densities, but the similarities often vanished when qualitative aspects were examined, such as proportion of long-lived species and presence of characteristic dominants (Lathrop and Archbold 1980).

Stylinski and Allen investigated the effects of severe disturbance (construction, heavy-vehicle activity, soil excavation, landfill operations, and tillage) on shrub communities in southern California. Their study revealed that these disturbances led to the conversion of indigenous shrublands to exotic annual communities with low native species richness. The cover of native species remained low on disturbed sites even 71 years after initial disturbance ceased. The study supported their hypothesis that altered stable states can occur if a community is pushed beyond its threshold of resilience (Stylinski and Allen 1999).

It may be concluded from these studies that certain ecosystems are more resilient than others to disturbance caused by underground transmission line construction and that permanently altered vegetation communities can occur if pushed beyond their thresholds of resilience. Shrub/bog

wetlands, as well as arid and semi-arid ecosystems, appear to be particularly susceptible to permanent damage from underground transmission line construction.

Additionally, because the vegetation composition within the ROW is kept free of large trees and shrubs, a permanent early successional habitat is created. The creation of these open and early successional habitats in a ROW is beneficial to some species and detrimental to others. In Wisconsin, transmission ROW have a positive effect on the federally endangered Karner blue butterfly (*Lycaeides melissa samuelis*), where blue lupine (*Lupinus perennis*), a plant vital to the butterfly's survival, is increasing in abundance because of the open areas in the overhead transmission line ROW (Willyard et al. 2004). The Karner blue butterfly serves as an example of a positive outcome of ROW corridors.

- Habitat fragmentation:

Habitat fragmentation can occur with construction of an underground transmission line, but results will vary depending on the plant species composition both within the ROW and adjacent to it. Effects seem to be species-specific and localized. The literature on the ecological effects of fragmentation focuses on reduced habitat area, species isolation, and increased habitat edge. Plants that are area, isolation, or edge sensitive will be negatively affected by fragmentation; however, plants that are not sensitive to fragmentation may be unaffected or even positively affected by the separation if it results in an increase in habitat or favorable conditions for these species.

The habitat fragmentation effects of roads on the landscape include dissecting vegetation patches, increasing the edge-affected area, decreasing interior area, and increasing the uniformity of patch characteristics, such as shape and size (Reed et al. 1996).

- Disruption of rare, threatened, and endangered plant species and habitats:

Direct and indirect impacts to rare, threatened, and endangered species populations are a key concern because of the tendency for these species to be less stable than other plant species. Even temporary disturbances can have adverse impacts. Impacts are dependent on species and project location.

Increased edge created by a transmission line corridor enhances local plant species diversity and has a positive effect on some individual species, typically those that are habitat generalists and are already common in the landscape. As a result, increased local diversity often comes at the expense of global species diversity, as rare plants are replaced by common ones. This phenomenon causes ecosystems to lose complexity (Willyard et al. 2004).

- Introduction of invasive plant species:

Noxious weeds and invasive plants can pose serious threats to the composition, structure, and function of native plant communities. Noxious weeds produce abundant seed, have fast growth rates, and can displace native species. Project activities that disturb the ground and the subsequent loss of native vegetation can make an area vulnerable to noxious weed invasions (Olson 1999). In addition, open roads can serve as corridors for weed spread. Noxious weed seeds can be carried in the undercarriage of vehicles and distributed along the roadway and the movement of animals or humans for management or recreational purposes can facilitate the spread of invasive species into previously inaccessible areas. Invasive species monopolize ecosystems and often out-compete native vegetation, which in turn negatively affects the animals dependent on these habitats.

A study in the southern California shrublands found that sites with severe disturbance from activities such as soil excavation and heavy-vehicle equipment consisted of 60 percent non-native annual species compared with undisturbed sites that were primarily covered with native shrub species (68 percent; Stylinski and Allen 1999).

#### **4.1.2 Wildlife Resources**

According to EPRI (2008), impacts to wildlife resources from trenching and ROW construction of an underground transmission line could result in the following:

- **Habitat and population fragmentation:**

Direct studies are lacking with regard to habitat fragmentation due to construction of an underground transmission line. However, inferences can be made from studies referencing linear projects (buried pipeline, roads, transmission line corridors) and their associated impacts

Roads fragment by changing landscape structure and by directly and indirectly affecting species. Road-avoidance behavior is characteristic of large mammals such as elk, deer, bighorn sheep, grizzly, and wolf. Avoidance distances of 100 to 200 meters are common for these species (Lyon 1983). Road density is a useful index for the effect of roads on wildlife populations (Forman et al. 1997). Some studies show that a few large areas of low-road density, even in a landscape of high average road density, may be the best indicator of suitable habitat for large vertebrates (Rudis 1995).

There is strong evidence that forest roads displace some large mammals and certain birds (such as spotted owls and marbled murrelets), and that displaced animals may suffer habitat loss as a result. Effects of roads on small mammals and songbirds are generally described as less severe, with changes expressed as modifications of habitat that cannot readily be classified as detrimental or beneficial.

Roads also create habitat edge (Mader 1984; Reed et al. 1996); increased edge changes habitat in favor of species that use edges, and to the detriment of species that avoid edges or experience increased mortality near or along edges (Marcot et al. 1994). The continuity of the road system also creates a corridor by which edge-dwelling species of birds and animals can penetrate the previously closed environment of continuous forest cover. Species diversity can increase, and increased habitat for edge-dwelling species can be created.

Roads and their adjacent environment qualify as a distinct habitat and have various species, population, and landscape-scale effects (Baker and Knight 2000, Dawson 1991, van der Zande et al. 1980). Some research attempts to describe habitat modifications caused specifically by roads, but most of this work is species and site-specific (Lyon 1983).

In general, road building fragments habitat, and creates habitat edge, modifying the habitat in favor of species that use edges. Edge-dwelling species are generally not threatened, however, because the human-dominated environment has provided ample habitat for them. Any habitat modifications attributed to the road may be insignificant compared to the effects of the activity, such as gas development activity, for which the road was built.

Concern for habitat fragmentation is increasing in wildlife management (Baker & Knight 2000) and is considered a global concern for biological diversity (Knight et al. 2000). Species declines and shifts of animal distributions have led to a more modern focus on the causes of habitat fragmentation and the effect this may have on wildlife. Avian responses to habitat fragmentation

include life cycle alterations, increased parasitism, and habitat affinity associations (Weller et al. 2002; Knight et al. 2000).

Habitat removal and fragmentation as a result of transmission line construction can alter wildlife migration corridors and dispersal orientation, as well as isolate wildlife populations and their gene pools. This significantly weakens the wildlife community.

Habitat fragmentation affects wildlife regardless of the location, but the degree to which wildlife is affected, and the species-specific effects, as they relate to construction of an underground transmission line cannot be definitely concluded. Construction of access roads directly applies, but construction of the ROW, while similar to a road, is dissimilar enough that direct conclusions cannot be drawn.

Some positive benefits do result from underground transmission construction. Bird strikes into overhead lines are reduced to zero where underground construction is used. Additionally, underground construction does not provide hunting perches for predator birds, which can prey on small mammals, amphibians and reptiles. This can be especially helpful in areas where rare, threatened, and endangered species are affected by predators that can use overhead line structures for perching and observation during hunting.

- Habitat loss and reduced species abundance:

Habitat loss can result from the conversion of land to road surfaces and facilities. Habitat loss can also result from construction of the ROW, as the habitat may be converted or changed from that prior to construction.

Fragmentation can also result in habitat loss and reduced species abundance. As the number of fragments increase in a given area, the core area size decreases, reducing the patches uninterrupted by human disturbance. The amount of edge area grows with the increase of fragments, and habitat connectivity decreases with increased fragmentation. Decreased connectivity may favor the habitat generalist wildlife species over the forest-adapted species, threatening species richness or diversity at regional scales (Knight et al. 2002). Habitat generalists, such as coyotes and brown-headed cowbirds, use road corridors to easily access the interior forest. These predators and nest parasites can have direct impacts on forest-adapted species populations. Opening up forest and to a lesser degree shrubland habitat also increases solar exposure during winter months creating earlier forage exposure for several species.

- Wildlife displacement and disturbance:

Construction of an underground transmission line may provide temporary or permanent wildlife disturbance by displacing animals from their typical habitat. Disruption comes from increased noise levels (e.g., construction); increased vehicle traffic (e.g., construction, maintenance, recreation use); and facility presence (e.g., manholes, access roads, and pad-mounted equipment). Most wildlife occupying a project area are displaced during construction, but some species such as nesting birds and amphibians are vulnerable to mortality from the physical disruption of soils and vegetation.

Many wildlife species are sensitive to harassment or human presence, often facilitated by construction activities and road access. Potential reductions in productivity, increases in energy expenditures, or displacements in population distribution or habitat use can occur (Bennett 1991; Mader 1984). However, the magnitude of impact to the species often depends on the experience associated with the disturbance (Geist 1978). For example, road disturbance leads to elk avoidance of large areas near roads open to traffic (Lyon 1983; Rowland et al. 2000) with elk

avoidance increasing with the increasing rate of traffic (Wisdom et al. 2000; Johnson et al. 2000). Hayden-Wing Associates (1991) reported significant declines in mule deer populations in Wyoming due to increased hunting access associated with access roads from development.

- Disruption of rare, threatened, and endangered species:  
Direct and indirect impacts to rare, threatened, and endangered species populations are a key concern because of the tendency for these species to be less stable than other wildlife species. Even temporary disturbances can have adverse impacts. Breeding habitat is especially important because disruption during breeding season can reduce productivity for the entire year. Impacts are dependent on species and project location.

#### **4.1.3 Geologic and Soil Resources**

According to EPRI (2008), impacts on geological and soil resources from trenching and ROW construction of an underground transmission line can result in the following:

- Soil erosion and/or compaction:  
All soils crossed by an underground transmission line are subject to vegetation removal or disturbance, displacement, compaction, and erosion. These disturbances, although temporary (e.g., construction and any reclamation), result in a minor increase in soil erosion and compaction levels. Some soils may need to be relocated during trenching and backfill operations.

Temporary impacts result from the grading of existing and new access roads, and construction of any staging areas. These soil surface-disturbing activities may include, but are not limited to, ROW clearing when necessary and construction equipment travel.

Soil surface disturbance results in short-term impacts associated with increased erosion rates. Actual erosion depends on factors at a particular site such as weather events, soil permeability, slope, and adjacent vegetation or lack thereof.

Heavy vehicles and equipment travel along the project ROW resulting in increased soil compaction. Moderate or severe soil compaction affects soil productive potential. The extent of compaction depends on soil moisture content and the physical characteristics of a particular soil type. Compaction tends to be less severe when soils are dry and more severe when soils are moist to wet.

- Disruption of soil profile:  
Impacts to soil resources can occur from inversion of the soil profile, loss of structure, and mixing of layers as the trench is backfilled. This may result in increased erosion and compaction and less productive soil for vegetation. Underground transmission lines require the importation of select thermal backfill in many instances. The sources of these materials can be located many miles from the project area. Borrow sites for these materials result in significant disturbances to the soil profiles of the borrow area and can contribute to land use and erosion impacts at the borrow sites without proper reclamation and stabilization techniques.
- Reclamation constraints due to soil type:  
Soils developed on Cretaceous shales, intrusive shales, and lacustrine sediments are more difficult to reclaim and revegetate due to their chemical composition and mechanical weathering products. Cretaceous shales and lacustrine sediments often produce highly saline soils, and intrusive rocks generally weather to granular sands with little nutrient availability.

- Disturbance to unique geological features  
Construction of the ROW and trenching activities associated with the construction of an underground transmission line have the potential to disturb unique geological features of a particular area

#### **4.1.4 Water Resources**

According to EPRI (2008), impacts on water resources from trenching and ROW construction of an underground transmission line can result in the following:

- Disturbance to surface water flows and floodplains:  
During construction, streams or waterways may need to be diverted. In addition to impacts on aquatic wildlife, riparian vegetation, and recreation activities, the diversion of streams or waterways during the construction of underground transmission lines can affect surface water flows and floodplains.

Construction near surface water has the potential to alter localized drainage patterns of the area. A permanently altered drainage pattern can temporarily increase erosion and sedimentation, eliminate the previous riparian corridor while eliminating non-riparian vegetation in the new corridor, harm wildlife, or damage existing land uses.

If drainage patterns are altered, this can change floodwater flows and associated floodplains.

- Disturbance to groundwater:  
Trenches for underground transmission lines which encounter groundwater can temporarily or permanently alter groundwater flows by changing the underground channels or pools that exist. This has the potential of affecting existing and proposed groundwater pumping for domestic use, irrigation, and other uses.

Dewatering is often necessary in areas with high water tables in order to remove excess water from the construction worksite. The main dewatering techniques include: barriers, sump and ditches, wellpoint systems, deep-well systems, and cutoffs. These techniques can impact the existing water table as well as adjacent land use, vegetation, soil, and wildlife depending on where and how the water is diverted.

- Water quality degradation:  
Construction near surface water has the potential to directly impact the quality of these water resources through erosion or discharge of materials. The period of highest potential impact is during and immediately following construction from the ROW construction, staging areas, or access roads. Construction in ephemeral drainages can deposit sediment on the dry streambed, which could then be delivered to the stream system when flows resume.

Water quality of surface waters can also be directly affected through the accidental release of pollutants such as fuel, lubricants, or antifreeze during construction.

#### **4.1.5 Cultural Resources**

According to EPRI (2008), impacts to cultural resources from trenching and ROW construction of an underground transmission line can result in the following:

- Ground disturbance:

Archaeological sites are non-renewable resources. Any disturbance to the vertical and horizontal distribution of artifacts and other material is permanent and irreparable. Even temporary or short-term activities can cause permanent damage to resources. Therefore, archaeological sites are very sensitive to any construction activities that result in ground disturbance.

The same project action (i.e., building an underground transmission line) can affect two resources very differently based on the overall size and shape of each cultural resource. For example, crossing a narrow, linear feature like a historic trail, even in a remote area, has a much lower potential impact than crossing a National Register of Historic Places district large enough to require extensive ground disturbance within the district.

- Visual intrusions:

While the scientific value of archaeological data is not affected by the visibility of a transmission structure, some architectural resources and some Native American sacred sites may be very sensitive to visual intrusions, such as ROW construction, in the natural landscape. Any visual impacts to cultural resources during construction may exist only for the duration of the particular activities and the time required for restoration and revegetation.

Compared to the long-term visual intrusions of overhead transmission lines and associated towers, underground transmission lines have less visual intrusion because they lack overhead structures. An exception is transition stations and structures placed at the end points of the underground line.

- Vandalism:

Improved access to a previously remote area may result in increased levels of vandalism. Cultural resources that are visually obvious (e.g., rock art, standing buildings) or attractive to vandals (e.g., large prehistoric archaeological sites, 19th century trash dumps) are more sensitive than smaller, less visible resources.

#### **4.1.6 Visual Resources**

According to EPRI (2008), direct, long-term impacts are expected in areas where corridors cross areas of outstanding scenic quality or visual integrity; where corridors are in the vicinity of cities, towns, communities, and other population concentrations; and where corridors are near or cross sensitive recreation and transportation viewpoints. Visual effects associated with the construction of an underground project include potential impacts to:

- Views from residents and communities – rural residences and communities dispersed throughout the study area.
- Views from parks, recreation and preservation areas – potential views from existing and proposed facilities and other developed sites including national monuments, state parks, national natural landmarks, proposed wilderness areas, and other public and private recreation areas.
- Views from sensitive transportation corridors – backcountry byways, scenic byways, and other sensitive travel routes.
- Views from sensitive cultural sites – National Historic Landmarks and other National Register of Historic Places sites or districts.
- Visual resource management – compatibility with BLM Visual Resource Management Classes.
- Scenic quality – impacts affecting the inherent aesthetic value of the landscape.

The visual impacts of underground lines are substantially less than overhead lines due to absence of above ground structures and substantially narrower ROW, but there are visual impacts from construction and maintenance activities. Visual impacts resulting from construction of an underground transmission line can be both short and long term. Short-term visual impacts can result from views of construction activities including the presence and storage of materials, construction workers, equipment, and landform contrasts from grading and trench excavation. These short-term visual impacts include the ROW, access roads, and staging areas.

Long-term impacts result from permanent visual contrasts (changes in vegetation, landform, or structure) that are seen by sensitive viewers. For example, construction of the permanent ROW includes clearing of all trees and tall shrubs, if present, and this condition is maintained to allow access and maintenance of the line.

Impacts occur when a sensitive viewer notices the contrasts resulting from the project. Sensitive viewers can be highway drivers, recreation users, residents on private lands, etc. High impacts are expected where high sensitivity viewers have foreground views of the project with high contrasts.

Underground transmission lines placed in existing developed corridors (e.g., road, utility) are not likely to detract from the existing view area. For example, a ROW through a forest has noticeable differences in vegetation for the first few years. With each successive year, however, the contrast is weaker, and within a few years is not noticeable to the casual viewer. There can be impacts due to loss of roadside vegetation, potentially including notable old trees. Vegetation loss impacts are greatest along more rural or residential streets than roadways in commercial areas.

The most recurring benefit regarding underground transmission lines is the aesthetic appeal to a vista without the interruption of utility lines. One aspect of aesthetics that is often overlooked is the overall impact it has on the quality of life. It is often the quality of places where people seek to relax, recharge and revitalize their lives. The state of Hawaii recognizes this by requiring an evaluation on the proximity and visibility of above ground high-voltage transmission systems to high density population areas, conservation and other valuable natural resource areas, public recreation areas, areas of special importance to the tourist industry, and other industries particularly dependent on Hawaii's natural beauty (Martin 1999).

## **4.2 Environmental Impacts Associated with Underground Transmission Line Operations and Maintenance**

The EPRI Report (2008) describes the environmental impacts associated with the operations and maintenance of an underground transmission line as:

- Increased Soil Temperature:  
Operation of an underground line produces heat, thereby raising the temperature a few degrees at the surface of the earth above the transmission line. This heat is not enough to disrupt growing plants, but it can cause premature seed germination in the spring. Heat can also build up in enclosed buildings near underground transmission lines. According to an EPRI report titled Study of Environmental Impact of Underground Electric Transmission Systems, this local increase in soil temperature becomes negligible (even at maximum load conditions) at distances of 15 to 20 feet from the trench center line (EPRI 1975).
- Potential Fluid Leaks:  
Both HPFF and SCFF cables most commonly utilize an insulating fluid that can be released to the environment from underground cables through leaks in pipe joints, from corrosion or by

accidental damage to the cable system. The two most common types of dielectric fluid are alkylbenzene (which is used in making detergents) and polybutene (which is chemically related to styrofoam). Although they are non-toxic, they are slow to degrade in the environment.

A fluid leak can migrate downward through the soil or may preferentially follow a migration path along the pipe backfill material and along intersecting utilities. Depending on the volume of fluid released, the soil properties, and the depth to groundwater, the fluid may reach the groundwater and accumulate as a lens or plume floating on the water table, potentially impacting nearby wells. Fluid-reaching storm sewers or other conduits may discharge to waterways and degrade surface water quality. In addition, the release and degradation of alkylbenzene could cause benzene compounds to show up in plants or wildlife (benzene is a known carcinogen).

Any soil contaminated with leaking dielectric oil is classified as a hazardous waste. This means that any contaminated soil or water must be remediated. Contamination areas (soil and water) are delineated, characterized, and cleaned up. Costs associated with these activities can rapidly escalate because of the diffusive nature of the dielectric fluids, especially in water. Older cable systems can be more prone to leaks and seeps and thus may present higher risks.

### **4.3 Comparison of Overhead and Underground Construction and Operation Impacts by Resource**

The following information is adapted from the EPRI 2008 Report.

The positive environmental effects of an underground transmission line include the potential increased property value for developed land; construction and maintenance of the right-of-way may benefit certain plant and animal species; and the aesthetic appeal to a vista without the interruption of overhead utility lines.

In general, the negative environmental effects of constructing and maintaining an underground transmission line are greater as compared to construction and maintenance of an overhead transmission line, but there may be projects, particularly in urban settings, where underground transmission facilities may be more appropriate or have fewer impacts. Each project must be evaluated based on the particular site, associated environmental resource impacts, project goals, and desired outcome.

The following tables (Tables 1 and 2) from the EPRI Report (2008) summarize the environmental impacts associated with overhead and underground transmission lines. Potentially beneficial and detrimental environmental impacts are categorized and subjectively assigned descriptions (i.e. Similar, Greater, or Lesser) comparing relative severity of the environmental effects between overhead and underground transmission line construction (Table 1) and maintenance activities (Table 2).

**TABLE 1 ENVIRONMENTAL COMPARISON OF THE CONSTRUCTION AND DECOMMISSIONING OF OVERHEAD AND UNDERGROUND TRANSMISSION LINES: CONSTRUCTION (EPRI TABLE).**

ENVIRONMENTAL ISSUE	UNDERGROUND DETRIMENTAL <sup>1</sup>	OVERHEAD DETRIMENTAL <sup>1</sup>
<b>Land Use</b>		
Agriculture	G	L
Forest	G	L
Residential	L	G
Commercial	S	G
Parks, Recreation, Preserves	G	L
Public Facilities	G	L

*Vantage to Pomona Heights 230 kV Transmission Line Project  
Undergrounding Transmission Line Report*

ENVIRONMENTAL ISSUE	UNDERGROUND DETRIMENTAL <sup>1</sup>	OVERHEAD DETRIMENTAL <sup>1</sup>
Industrial	G	L
Transportation and Access	S	S
<b>Biological Resources</b>		
Disrupting Existing Vegetation	S	S
Changing Habitat/Vegetation Composition	S <sup>2</sup>	S <sup>2</sup>
Habitat/Species Fragmentation	S	S
Habitat Loss/Reduced Species Abundance	S <sup>2</sup>	S <sup>2</sup>
Disruption to Rare, Threatened, Endangered Species	S	S
Introduction of Invasive Species	S	S
Wildlife Displacement	G	L
<b>Geological and Soil Resources</b>		
	G	L
<b>Water Resources</b>		
Surface Flow and Flood Plains	G	L
Wetlands	G	L
Groundwater	G	L
Water Quality Degradation	G	L
<b>Cultural Resources</b>		
Ground	G	L
Visual	L	G
Vandalism	S	S
<b>Visual Resources</b>		
	L	G
<b>Decommissioning of Lines</b>		
	G	L

<sup>1</sup> Categorization of potentially beneficial and detrimental environmental impacts that are: SIMILAR (S), GREATER (G), or LESSER (L) environmental impact between overhead and underground transmission lines.

<sup>2</sup> Habitat and species diversity can be enhanced through proper mitigation during construction and implementing industry best management practices for follow-up maintenance.

**TABLE 2 ENVIRONMENTAL COMPARISON OF THE CONSTRUCTION AND DECOMMISSIONING OF OVERHEAD AND UNDERGROUND TRANSMISSION LINES: MAINTENANCE AND OPERATION (EPRI TABLE).**

ENVIRONMENTAL ISSUE	UNDERGROUND DETRIMENTAL <sup>1</sup>	OVERHEAD DETRIMENTAL <sup>1</sup>
<b>Avian Interactions</b>		
Collisions	L	G
Electrocutions	L	G
Habitat Enhancement	G	L
<b>Soil Temperatures</b>		
	G	L
<b>Soil Contamination</b>		
	G	L
<b>Soil Compaction</b>		
	G	L
<b>Soil Erosion</b>		
	G	L
<b>Vegetation Maintenance Frequency/Intensity</b>		
	S <sup>2</sup>	S
<b>Plant Community Diversity and Composition</b>		
	S	S

<sup>1</sup> Categorization of potentially beneficial and detrimental environmental impacts that are: SIMILAR (S), GREATER (G), or LESSER (L) environmental impact between overhead and underground transmission lines.

<sup>2</sup> A properly maintained underground ROW typically is kept clear of trees and large shrubs that can interfere with underground lines via plant root systems. Depending on the site, a similar frequency and intensity of vegetation maintenance activity as compared to overhead transmission lines may be required.

## 5.0 APLIC BURYING POWER LINES

The information presented in this section is from the APLIC Report on Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012). APLIC membership includes over 50 utilities, Edison Electric Institute, USFWS, EPRI, National Rural Electrical Cooperative Association, and Rural Utilities Service. APLIC has developed guidance documents identifying causes and minimization methods for avian electrocutions and collisions, and released national Avian Protection Plan Guidelines in conjunction with the USFWS. With regard to burying transmission lines, the APLIC report states:

Burying power lines with voltages less than 345 kV have been proposed to reduce collisions. However, there are innate characteristics of buried lines that make them only rarely feasible. These include voltage and type of cable, land use patterns, soil conditions, regulatory acceptance, outage risk and reliability requirements, termination facility requirements, length and operating limits, and other environmental concerns. Depending on these characteristics, the cost of buried power lines can vary from 3 to 20 times that of an overhead line (Bumby et al. 2010).

*Voltage and Type of Cable:* As the voltage increases, costs increase. The type of cable (power line) used also affects the cost. Current options include paper insulated cable installed in oil-filled pipes, and solid dielectric cables installed in conduits or buried directly in the earth with selected backfill.

Lines less than or equal to 69 kV are normally installed in pressurized, oil-filled pipes in order to eliminate voids and moisture pockets in the cable insulation. They have an excellent reliability record when properly designed, installed, and maintained. The oil also tends to dissipate the heat generated by the current flow in the cables. If the oil can be circulated under pressure, the capacity and reliability of the cable will be enhanced.

Solid dielectric cables are currently being used for 115 kV and 230 kV applications. They are less reliable than oil-filled pipes. The preferred design is to place them in a conduit so that construction in highly developed areas may move rapidly and the necessary excavation can be covered quickly to reduce the impact and inconvenience to the public. The conduit also provides some physical protection to the cable from accidental excavations.

*Land Use Patterns:* In highly developed areas where other utilities are buried (e.g., water, sewer, gas, communication), costs and space are at a premium. In rural areas, some conflict may exist with pipelines, rivers, and lakes (see Figure 8 and Environmental Concerns below). In undeveloped areas, geologic formations may prevent economical trenching. In addition, underground lines require termination areas at both ends, similar to small substations, to accommodate the overhead-to-underground transitions.



**Figure 8** Underground Transmission Line Duct Bank Installation

***Soil Conditions:*** The soils must be able to dissipate heat during periods of high electricity demand. Soil condition also directly affects construction cost (i.e., sandy soils are more easily trenched than rocky soils). In many cases, the spoils from the cable trench have to be hauled away and replaced with heat-dissipating sands to meet the cable design standards.

***Regulatory Acceptance:*** Utility regulatory commissions set rates and control costs. This can have a direct bearing on the feasibility of an underground project. There are documented projects where regulatory commissions have instructed the parties requesting underground construction to pay the difference in installation cost (e.g., Colorado Public Utility Commission Decision No. R82-93).

***Requirements for Termination Facilities:*** These include access for large equipment, a fenced area, transition structures, switches and other protective equipment, a transmission line tower or distribution structure, and in some cases a pumping station. Such overhead electrical facilities should be designed to minimize avian electrocution risk (see Suggested Practices for Avian Protection on Power Lines; APLIC 2006).

***Length and Operating Limitations:*** As the length of the line increases, the operating limitations are approached and the options to address this will further increase costs.

***Environmental Concerns:*** Environmental damage can result if a buried power line is near or crosses a waterway or is in wetlands or other sensitive habitats. If an oil-filled pipe leaks, the oil would contaminate the water and surrounding soils. Ground disturbance during construction, repairs, and maintenance can result in large, permanent displacement of excavated soil and subsequent issues with re-establishing native vegetation and preventing the overgrowth of invasive species. A University of California study (Bumby et al. 2010) found that underground power lines have more environmental impacts than overhead power lines for all categories and most scenarios in southern California (APLIC 2012).

## **6.0 LOCATION OF UNDERGROUND 230KV LINES IN THE U.S.**

According to Xcel Energy Inc (2011), in 2006 there were approximately 160,000 miles of 230 kV or greater high-voltage transmission lines in the U.S., with the existing underground transmission estimated at between 0.5 and 0.6 percent of this total.

## **7.0 COMPARISON OF OVERHEAD AND UNDERGROUND CONSTRUCTION ACTIVITIES**

The purpose of this section is to provide information on the typical construction techniques and activities associated with the construction of a 230 kV overhead and underground transmission line. This section also quantifies and compares the temporary and permanent disturbance of a 230 kV overhead and underground transmission line.

### **7.1 Typical Overhead Construction Activities**

As proposed by Pacific Power, most of the proposed transmission line would be constructed on H-frame wood pole structures between 65 and 90 feet tall and spaced approximately 650 to 1,000 feet apart depending on terrain. The H-frame structures would typically be used in open flat to gently rolling terrain. The ROW width for the H-frame structure type would be between 125 to 150 feet.

#### **7.1.1 Access Roads**

Construction of the transmission line would require vehicle, truck, and crane access to each new structure site for construction crews, materials and equipment. Access along the transmission line ROW would include existing roads in their current condition, existing roads that would be improved as part of this Project and new access roads. The Project would use existing roads and trails wherever feasible to minimize the construction of new access roads. Permanent access roads would be constructed where needed for construction and long-term maintenance. Permanent access roads would be graded to a total width of approximately 14 feet (including both the travel surface and shoulders) depending on location and terrain.

#### **7.1.2 Work Areas and Set-up Sites**

During construction of the transmission line, there would be temporary work areas at each structure site to facilitate the safe operation of equipment and construction operations. There would also be temporary work areas at pulling and tensioning sites, material staging sites, and turn-around areas.

Work areas would require a temporary disturbance area of 150 feet by 125 feet (18,750 square feet) for H-frame structures.

Pulling and tensioning sites for stringing the conductor would require a temporary disturbance area of 125 feet by 400 feet (50,000 square feet). Sites for pulling and tensioning would be located approximately every 11,000 feet (approximately two miles) or less. This is the length of the longest reel of conductor that would be utilized for the Project.

Turn-around areas may be required in certain areas where construction travel would be restricted by rock outcrops, washes, ravines or sensitive areas. Turn-around areas would typically require a temporary disturbance area of 60 feet by 60 feet or 3,600 square feet.

#### **7.1.3 Pole Installation**

Poles would be placed in holes created with a vehicle-mounted power auger, directly embedded into the ground and typically do not require concrete foundations. The embedment depth for poles up to 95 feet

tall is typically 10 percent of the pole length plus two feet; for poles 100 feet and taller, 10 percent of the pole length plus three feet.

Embedment depth is expected to be between nine and 15 feet based on the structure heights proposed for the Project. The actual depth will depend on load and soil characteristics. No foundations would be required for the wood pole structures except where necessary due to local terrain conditions, areas of uplift, and at transmission angle points. The diameter of the hole excavated for embedment is typically the pole diameter plus 18 inches. When a pole is placed in a hole, native or select backfill will be used to fill the voids around the perimeter of the hole.

#### **7.1.4 Pole Assembly and Erection**

Wood poles and associated hardware would be delivered to each pole work area by truck. Insulator strings and stringing sheaves are then installed at each ground wire and conductor position while the pole is on the ground. Stringing sheaves are used to guide the conductor during the stringing process for attachment onto the insulator strings. The assembled structure would then be hoisted into place by a crane or line truck

#### **7.1.5 Conductor and Shield Wire Installation**

Conductors and shield wire would be placed on the transmission line structures by a process called stringing. The first step to wire stringing is the installation of insulators (if not already installed on the structures during ground assembly) and stringing sheaves. Stringing sheaves are rollers that are temporarily attached to the lower portion of the insulators at each transmission line structure to allow conductors to be pulled along the line. Additionally, temporary clearance structures (also called guard structures) would be erected where required prior to stringing any transmission lines. These temporary clearance structures are typically vertical wood poles with cross arms and nets erected over highways, roads, power lines, structures and other obstacles to prevent ground wire, conductors, or equipment contact during stringing activities. Guard structures may not be required for small roads or may be accommodated by bucket trucks to provide temporary clearance. Bucket trucks are trucks fitted with a hinged arm ending in an enclosed platform called a bucket, which can be raised to let the worker in the bucket service portions of the transmission structure as well as the insulators and conductors without climbing the structure. Other safety measures such as barriers, flagmen, or other traffic control would be used.

Once the stringing sheaves and temporary clearance structures are in place, the initial stringing operation commences with the pulling of a lighter weight sock line through the sheaves along the same path the transmission line will follow. The sock line can be pulled in via helicopter or by ground based equipment. The sock line is attached to the hard line, which follows the sock line as it is pulled through the sheaves. The hard line is then attached to the conductor, shield wire or fiber optic ground wire to pull them through the sheaves into their final location. Pulling the lines is accomplished by attaching them to a specialized wire stringing vehicle. Following the initial stringing operation, pulling and tensioning the line will be required to achieve the correct sagging or tension of the transmission lines between support structures.

Pulling and tensioning sites for 230 kV transmission line construction would be required approximately every two miles along the ROW and would encompass approximately 1.2 acres each to accommodate required equipment. Equipment at sites required for pulling and tensioning activities would include tractors and trailers with spooled reels that hold the conductors, and trucks with the tensioning equipment. To the extent practicable, pulling and tensioning sites would be located within the ROW. Depending on topography, minor grading may be required at some sites to create level pads for equipment. Finally, the tension and sag of conductors and wires would be fine-tuned, stringing sheaves would be removed, and the conductors would be permanently attached to the insulators at the transmission structures.

At the tangent and small angle structures, the conductors will be attached to the insulators using clamps to “suspend” the conductors from the bottom of the insulators. At the larger angle dead-end structures, the conductors cannot be pulled through and so are cut and attached to the insulator assemblies at the structure “dead ending” the conductors.

### **7.1.6 Site Reclamation**

The Contractor would restore all lands disturbed during construction including but not limited to: access roads, tensioning and pulling sites, structure sites, work areas, and staging areas. Every effort would be made to restore the disturbed areas to original contours and conditions, and to restore natural drainage within the ROW.

Disturbed areas would also be prepared for revegetation by distributing stockpiled soils and, where necessary, ripping or surface scarification. The Contractor would dispose of excess soils, rocks, and other materials that are unsuitable for site restoration. Prepared sites would be reseeded utilizing agency approved seed mixtures.

Any fences that were cut or otherwise modified during construction would be repaired and properly tensioned. Additionally, all gates or other features affected by construction activities would be repaired to their previous condition.

### **7.1.7 Permitted Uses In and Adjacent to ROW**

After the transmission line has been energized, land uses that are compatible with safety regulations would be permitted in and adjacent to the ROW. Existing land uses such as agriculture and grazing are generally permitted within the ROW. Incompatible land uses within the ROW include construction and maintenance of inhabited dwellings, and any use requiring changes in surface elevation that would affect electrical clearances of existing or planned facilities.

## **7.2 Typical Underground Construction Activities**

An underground 230 kV cable system would consist of either solid XLPE or HPFF electric transmission cables (see Section 3), which would be contained within a concrete-encased duct bank (consisting of several conduits), as well as concrete splice vaults. Splice vaults are required for pulling in the transmission cable through conduits, for the splicing of each cable length, and ultimately to provide access to portions of the cable system to perform maintenance and repair activities. Two to four splice vaults would be buried at intervals of approximately 1,500 feet along the route. Illustrations of a typical duct bank installation and splice vault are included as Figures 1, 2, and 3 of this Technical Report.

In addition, three fiber optic cables would be installed in the duct bank. Two fiber optic cables are required for remote protection and control of the cable system and associated equipment, and the other fiber optic cable is for monitoring the operating temperature of the cables. A ground continuity conductor would also be installed for grounding the cable sheaths and equipment within the proposed splice vaults. The fiber optic cables would be spliced and pulled into a precast handhold located near each splice vault location.

### **7.2.1 Duct Bank Requirements for Off-Road Construction**

For off-road construction, a new underground cable would require a dedicated area for construction, consisting of a permanent easement for future maintenance and repair activities and an additional temporary easement during the initial construction for equipment and temporary storage of materials. See Figure 2 for a photograph showing typical underground cable construction.

Instead of preparing work sites for each overhead structure 600 feet to 1,000 feet apart, the entire length of the right-of-way has to be cleared and scrubbed of all vegetation to accommodate installation of the underground cable. The total construction surface impact area for underground cable construction and installation would be approximately 55 to 60 feet or greater in width along the entire underground route to accommodate trenching machines or excavators, truck mounted rock drills, dump trucks to haul out excavated material unsuitable for backfill and to haul in backfill material.

A permanent access road of approximately 14 feet in width would be required to perform operation and maintenance. A permanent cleared surface area would be required for the width of the cable structure duct bank; 5 to 10 feet wide plus the permanent 14 feet access road for a total permanent cleared area of approximately 25 feet wide.

### **7.2.2 Splice Vault Requirements**

The outside dimensions of splice vaults for 230 kV underground cables are approximately 12 feet wide by 12 feet tall and up to 28 feet long. The installation of each splice vault therefore typically requires an excavation area approximately 13 feet wide, 13 feet deep, and 30 feet long. The actual burial depth of each vault would vary, based on the cable manufacturer's splice and cable racking requirements, site-specific topographic conditions and on the depth of the adjacent cable sections that must interconnect within the vault.

Splice vaults would require a permanent easement for future access for maintenance and transmission cable repairs, and an additional temporary easement for construction activities. Within the easements for the splice vaults, certain uses such as the development of structures and growth of shrubs and trees would be prohibited to avoid duct bank damage and impacts to the operation of the cables.

### **7.2.3 Construction Procedures**

The first step in the underground construction process would be to deploy appropriate erosion and sedimentation controls (e.g., catch basin protection, silt fence or straw bales) at locations where soils would be disturbed.

### **7.2.4 Open Cut Trenching**

To install the duct bank, a trench would be excavated approximately 6 to 10 feet deep and approximately 5 to 10 feet wide (for trench depths requiring shoring to stabilize the sidewalls). Excavated material (e.g., subsoil) would be placed directly into dump trucks and hauled away to a suitable disposal site or hauled to a temporary storage site for screening/testing prior to final disposal or re-used in the excavations for backfill. If groundwater is encountered, dewatering would be performed in accordance with authorizations from applicable regulatory agencies and may involve discharge to catch basins, temporary settling basins, temporary holding tanks (frac tanks), or vacuum trucks. When bedrock or subsoils primarily consisting of large boulders are encountered, blasting may be required. See Figures 1 and 2 for photographs of open cut trenching.

### **7.2.5 Duct Bank Installation**

The duct bank system would consist of 6-inch polyvinyl chloride (PVC) conduits for the XLPE cables; two-inch PVC conduits for the ground continuity conductors; and four-inch PVC conduits for the fiber optic relaying cables and the temperature sensing fiber cables. The conduit would be installed in sections, each of which would be about 10 to 20 feet long and would have a bell and spigot connection. Conduit sections would be joined by swabbing the bell and spigot with glue then pushing the sections together. After installation in the trench, the conduits would be placed into spacers that hold the conduit in the desired configuration and then encased in high strength concrete. The trench would then be backfilled

with a low-strength fluidized thermal backfill with sufficient thermal characteristics to help dissipate the heat generated by the cables.

Trenching, conduit installation, and backfilling would proceed progressively along the route such that relatively short sections of trench (typically 200 feet per crew) would be open at any given time and location.

### **7.2.6 Splice Vault Installation**

At intervals of approximately 1,500 feet along the route, pre-cast concrete splice vaults would be installed below ground. The length of an underground cable section between splice vaults, and therefore the location of the splice vaults, is determined based on engineering requirements and land constraints. Engineering requirements include: the maximum allowable cable pulling tensions; maximum allowable cable sidewall pressure; and cable weight/length that can fit on a reel and be safely shipped. The specific locations of splice vaults would be determined during final engineering design. Figure 3 shows typical underground splice vault installation.

For safety purposes, the splice vault excavation would be shored and fenced. Each vault would have two entry points to the surface. After backfilling, these entry points would be identifiable as manhole covers, which would be set flush with the ground.

### **7.2.7 Conduit Testing**

After the vaults and duct bank are in place, the conduits would be swabbed and tested (proofed), using an internal inspection device (mandrel), to check for defects. Mandrelling is a testing procedure in which a “pig” (a painted aluminum or wood cylindrical object that is slightly smaller in diameter than the conduit) is pulled through the conduit. This is done to ensure that the “pig” can pass easily, verifying that the conduit has not been crushed, damaged, or installed improperly.

### **7.2.8 Cable Installation**

After successful proofing, the transmission cables and ground continuity conductors would be installed and spliced. Cable reels would be delivered by tractor trailers to the vault sites, where the cable would be pulled into the conduit using a truck-mounted winch and cable handling equipment. To install each transmission cable and ground continuity conductor within the conduits, the large cable reel would be set up over the splice vault, and a winch would be set up at one of the adjacent splice vault locations. The cables and the ground continuity conductors (during a separate mobilization) would then be inserted in the conduits by winching a pull rope attached to the ends of each cable. The splice vaults would also be used as pull points for installing the temperature sensing fiber optic cables under a separate pulling operation. In addition, pull boxes would be installed near the splice vaults for the pulling and splicing operations required for the remaining fiber optic cables.

### **7.2.9 Cable Splicing**

After the transmission cables and ground continuity conductors are pulled into their respective conduits, the ends would be spliced together in the vaults. Because of the time-consuming precise nature of splicing high-voltage transmission cables, the sensitivity of the cables to moisture (moisture is detrimental to the life of the cable), and the need to maintain a clean working environment, splicing XLPE cables involves a complex procedure that requires a controlled atmosphere. This “clean room” atmosphere would be provided by an enclosure or vehicle that must be located over the manhole access points during the splicing process. It is expected to take approximately five to seven days to complete the splices in each splice vault. Each cable and associated splice would be stacked vertically and supported on the wall of the splice vault via a racking system. During commissioning, access to splice vaults may be required.

### **7.2.10 Underground to Overhead Transition Stations**

High voltage underground transmission lines require transition stations whenever the underground cable connects to overhead transmission. The appearance of a transition station is similar to that of a small switching station. The size is governed by whether reactors or other similar components are required. They range in size from approximately 1 to 2 acres. Transition stations also require grading, access roads and storm water management facilities. Figure 7 is a photograph of a small transition station. Two transition stations would be required for each segment of undergrounding.

### **7.2.11 Site Reclamation**

Site reclamation is similar to the description for overhead transmission with the exception that access must be maintained along the entire length of the ROW for inspection and repair.

### **7.2.12 Permitted Uses In and Adjacent to Underground ROW**

Following construction, the ROW must be kept clear of vegetation with long roots. Trees, large shrubs and woody vegetation would not be allowed within the ROW to preclude intrusive root systems in the vicinity of the cable. Some herbaceous vegetation may be allowed to return to the ROW (WPSC 2011).

## **8.0 OVERHEAD AND UNDERGROUND TRANSMISSION LINE TEMPORARY AND PERMANENT DISTURBANCE**

This section presents information and calculations of temporary/short-term and permanent/long-term disturbance of a 230 kV overhead and underground transmission line. For the purposes of calculating disturbance amounts, two miles of overhead and underground transmission line are used. The disturbance amounts are expressed in square feet and acres. The total estimated amount of temporary and permanent disturbance for overhead and underground construction is discussed in Section 8.3 and summarized in Table 3 below.

### **8.1 Overhead Transmission Line Temporary and Permanent Disturbance**

#### **8.1.1 Temporary Disturbance Assumptions for 2 miles of Overhead Transmission Line**

- H-frame Structure Work Area – 150 feet x 125 feet (18,750 square feet [sq. ft.])  
800 feet span length/10,560 feet (2 miles) = 13 structures  
13 structures x 18,750 sq. ft. = **5.6 acres** (243,750 sq. ft.)

Work areas are required at each structure site to facilitate the safe operation of equipment and construction operations. The size of the work area is driven by the need to lay down poles, install the necessary hardware and frame them to full length.

- Pulling and Tensioning Sites - 125 feet x 400 feet (50,000 sq. ft.; 1.2 acres)  
**1 site = 1.2 acres**

Pulling and tensioning sites for stringing the conductor would be located approximately every 11,000 feet (two miles) or less. This is the length of the longest reel of conductor that would be utilized by the project.

#### **8.1.2 Permanent Disturbance Assumptions for 2 miles of Overhead Transmission Line**

- H-frame Structure – 20-inch diameter for each pole;

20 inch diameter poles + auger holes = 7.5 sq. ft. x 2 poles/structure = 15 sq. ft./structure  
13 structures x 15 sq. ft./structure = **0.05 acre** (195 sq. ft.)

- Work pads at each structure – 30 feet x 40 feet (1,200 sq. ft.)  
13 structures x 1,200 sq. ft./structure = **0.4 acre** (15,600 sq. ft.)
- New 14-foot wide access road – 10,560 feet (2 miles) x 14 feet = **3.4 acres** (147,840 sq. ft.)

## 8.2 Underground Transmission Line Temporary and Permanent Disturbance

### 8.2.1 Temporary Disturbance Assumptions for 2 miles of Underground Transmission Line

- Splice Vaults – 2 vaults every 1,500 feet  
10,560 feet (2 miles)/1,500 = 7 splice vaults x 2 = 14 splice vaults every 2 miles  
Excavation area for splice vault installation = 13 feet wide x 13 feet deep x 30 feet long  
13 feet wide x 30 feet long = 390 sq. ft. x 14 vaults = **0.13 acre** (5,460 sq. ft.)
- Cleared construction surface area for open cut trenching, duct bank and cable installation  
55 to 60 feet wide x 10,560 feet (2 miles) = **13.3 to 14.6 acres** (580,800 sq. ft. to 633,600 sq. ft.)

### Permanent Disturbance Assumptions for 2 miles of Underground Transmission Line

- Permanent Cleared Surface Area:  
Duct bank – 5 to 10 feet wide  
Permanent access road = 14 feet wide  
Duct bank + access road = 19 feet to 24 feet wide  
19 to 24 feet wide x 10,560 feet (2 miles) = **4.6 to 5.8 acres** (200,640 sq. ft. to 253,440 sq. ft.)
- Overhead to Underground Transition Stations:  
2 stations at 1 – 2 acres each = **2 to 4 acres**

## 8.3 Summary Comparison of Overhead and Underground Temporary and Permanent Disturbance

The estimated amount of disturbance was calculated for a 2 mile section of an overhead and underground transmission line. The total amount of disturbance (temporary and permanent) for a 2 mile section of an overhead line was estimated to be approximately 10.3 acres. The total amount of disturbance calculated for the same 2 mile section for an underground transmission line is estimated to be 20 to 24.5 acres, twice as much as for an overhead line (Table 3).

**TABLE 3      COMPARISON OF ESTIMATED OVERHEAD AND UNDERGROUND DISTURBANCE (TEMPORARY AND PERMANENT) FOR A 2 MILE SECTION OF LINE.**

DISTURBANCE DURATION	OVERHEAD LINE	UNDERGROUND LINE
Temporary	6.8 acres	13.4 to 14.7 acres
Permanent	3.5 acres	6.6 to 9.8 acres
<b>Total for 2 Mile Section</b>	<b>10.3</b>	<b>20 to 24.5 acres</b>

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# **APPENDIX I WDFW MOU COMPLIANCE SUMMARY**

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## **INTRODUCTION**

The following letter from Washington Department of Fish and Wildlife (WDFW) was provided to the BLM after the close of the SDEIS comment period. It is included in accordance with the Cooperating Agency Memorandum of Understanding (MOU) BLM-OR-W000-1506 executed between the United States Department of the Interior, Bureau of Land Management (BLM) and the WDFW. The MOU allowed WDFW to provide BLM with a summary document of WDFW's disagreements with the Vantage to Pomona Heights 230 kilovolt Transmission Line Project Final Environmental Impact Statement (FEIS).

The BLM did not formally respond to the WDFW letter. Likewise, it did not formally respond to similar comments it received from WDFW after the close of the Supplemental Draft Environmental Impact Statement comment period. However, in view of these WDFW's concerns, the BLM added information to the FEIS relating to the Yakima Basin Integrated Water Resource Management Plan Programmatic Final Environmental Impact Statement and the proposed Wymer Reservoir. The BLM concluded that none of the information provided by WDFW constituted significant new information, which warranted further detailed analysis.

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State of Washington  
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September 16, 2016

Roberta Estes

OR/WA BLM FERC Hydropower Coordinator, Special Projects Manager

Bureau of Land Management

3050 N.E. 3rd Street

Prineville, OR 97754

**RE: Summary of Unresolved Cooperating Agency Inconsistencies on Substantive Elements of the Vantage to Pomona Heights Transmission Line Project FEIS**

Ms. Estes:

Consistent with the Cooperating Agency Memorandum of Understanding (MOU) BLM-OR-W000-1506 between the United States Department of the Interior, Bureau of Land Management (BLM) and the Washington Department of Fish and Wildlife (WDFW), and as agreed to by BLM at a meeting in Yakima on August 2, 2016, we submit the following summary of WDFW's disagreements with the Vantage to Pomona Heights 230 kV Transmission Line Project (Project) Environmental Impact Statement Final Environmental Impact Statement (FEIS) for inclusion in the FEIS.

We acknowledge the effort and diligence applied by the BLM and Cooperating Agencies in the preparation of this FEIS, and express appreciation for the process established to identify, discuss and resolve issues over the course of the document's preparation. WDFW appreciates the analysis of direct, indirect, and connectivity effects associated with construction and operation of the Project, particularly the important efforts to use available science to analyze and compensate for indirect effects of transmission line projects.

As acknowledged in the FEIS, certain elements of the FEIS were not able to be established via Cooperating Agency consensus. We capture in this summary the most important WDFW recommendations that were not adopted in the FEIS. These recommendations were made over many years and in various venues, including formal EIS comments, Cooperating Agency review of the Administrative Draft FEIS, review of the Draft Framework for Development of a Sage-Grouse Compensatory Mitigation Plan, review of the Draft Greater Sage-Grouse Compensatory Mitigation Plan, and through various informal comment opportunities associated with the Project's Sage-Grouse Subgroup.

Recommendations stem from WDFW's mandate to preserve and protect wildlife and habitat, as well WDFW's guiding policies, procedures, and experience in wildlife management, mitigation, and sage-grouse recovery.

### New Northern Route –Overhead

As a Cooperating Agency, WDFW officially expressed preferred support for a modified version of the Southern Route. WDFW's second option was the New Northern Route with an iteration of undergrounding. When compared with the New Northern Route – Overhead these route alternatives better avoid adverse impacts to ecological connectivity and sage-grouse movement between the Yakima Training Center (YTC) Priority Area for Conservation (PAC) and existing habitat on private lands as well as the protected state Wenas Wildlife Area and other public lands to the west, therefore offering a better complement to the existing state investments in wildlife conservation to the west of the PAC. These routes better minimize the effect on permeability of current and future movement of sage grouse to the northern end of the YTC PAC. Importantly, the Southern Route Alternatives locate the line and its associated effects where protection of habitat south of the Yakima Training Center is less certain in the near future and where higher risks of conversion are located. WDFW recommended consideration of strategic burial of the Southern Route, or at a minimum co-locating the various southern alternatives along existing transmission lines with the modified WECC proximity standards, to further reduce the line's indirect effects on sage-grouse, its proximity to active leks, and potential conflicts with agriculture and private landowners.

### Sage-Grouse Mitigation Framework

For the Project to achieve net benefit for sage-grouse, the mitigation obligation must fully account for unavoidable impacts to function and values, and appropriately value lost habitat function and productivity in a Priority Area for Conservation (PAC), so that when mitigated the result is a gain in habitat value over that lost from the Project.

Of particular concern to WDFW is the proposed mitigation ratio for the YTC PAC. Due to the noted difficulty in replicating and conserving a PAC for sage-grouse, as identified in the Conservation Objectives Team report, WDFW recommends a minimum baseline PAC mitigation ratio of 3:1, especially when considering current sage grouse status and viability. U.S. Fish and Wildlife Service (FWS) have identified an existing agreement with the Army for a 3:1 ratio for impacts on certain YTC lands in the PAC, though FWS also note that significant additive ratios for sage-grouse features in addition to a 3:1 ratio may be warranted, given the new impacts of the Project on the population at YTC. At a minimum, the base mitigation ratio in the YTC PAC should be 3:1.

### Yakima Basin Integrated Water Resource Management Plan

Washington State, under the leadership of Governor Jay Inslee and the Department of Ecology's Office of Columbia River has made significant investments in the Yakima Basin Integrated Water Resource Management Plan (Integrated Plan). It is supported by a diverse set of stakeholders and is designed to secure the basin's future water supply needs, accomplish fish recovery goals through fish passage and habitat restoration, and protect and enhance the watershed in the forest and shrub steppe zones. The Plan is integrated because it balances water supply needs with fish and habitat goals.

One important water supply project is development of off channel water storage in the Yakima River Canyon. The proposed Wymer reservoir will inundate shrub steppe habitat near the YTC. To balance these potential impacts the Integrated Plan commits to the protection of 15,000 acres of shrub steppe habitat. Lands surrounding the proposed reservoir site lie between the YTC and a WDFW wildlife area. The wildlife area is primarily shrub steppe habitat and is the most accessible, protected area for sage-grouse to expand their population off of YTC. Therefore, the first priority for shrub steppe protection in the Integrated Plan is the ranch adjacent to the proposed reservoir, which may provide permanent habitat connectivity between YTC and state managed lands. Adding a new powerline to the landscape will diminish the conservation value of these lands as envisioned in the Integrated Plan. Furthermore, a new powerline, even if adjacent to the existing powerline, will increase the barrier to sage-grouse movements between YTC and the wildlife area diminishing the habitat availability of the state lands to the west.

Achieving net benefit for sage-grouse requires the selection of a project alternative and development of a mitigation strategy that compliments rather than hinders the Integrated Plan. The preferred alternative in the FEIS presents complications for the Integrated Plan that are not adequately analyzed in the NEPA document and represent a concern for the state. One reason the Integrated Plan is widely supported is because it includes a robust conservation package that balances the impacts from water development projects. WDFW's support of the entire Integrated Plan was because of this balanced approach. The Project's Compensatory Mitigation Plan will need to balance the potential complications for the Integrated Plan.

#### Co-location of Southern Route Alternatives to WECC proximity standards

The Supplemental Draft EIS for the Project included a modified New Northern Route that is co-located at a closer proximity to the existing transmission line than previously allowed under WECC proximity standards. The change of proximity standards by WECC alleviated potential concerns from the Army on Project impacts to YTC training activity. The siting of the various alternatives of the Southern Routes should also have been revisited in light of the change in the WECC proximity standards. Numerous transmission lines of varying sizes are in close proximity to the proposed alternative Southern Routes. It appears that much of the Southern Route in Grant and Yakima Counties could be co-located with existing lines without lengthening the alternative. Additional co-located segments would reduce the line's indirect effects on sage-grouse as well as limit proximity to active leks. Importantly, additional co-location and co-location at a closer distance than previous WECC standards may dramatically reduce the impacts

Ms. Robin Estes  
September 16, 2016  
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to private landowners and potential conflict with irrigation and agriculture identified for the Southern Route alternatives in the FEIS.

Sincerely,

A handwritten signature in cursive script that reads "Justin Allegro".

Justin Allegro,  
Energy Policy Lead  
Washington Department of Fish and Wildlife

CC:  
WDFW, Yakima, WA (M. Livingston)