

**Appendix A – Responses to Comments on the
Final Environmental Impact Statement**

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The Environmental Protection Agency (letter dated December 19, 2016) recommended additional explanation regarding the selection of an Agency Preferred Alternative that is considerably different from the environmentally preferable action alternative in Segment 1. The BLM has provided additional explanation in the Agency Preferred Alternative section of this ROD.

Table A-1. Comments Received on the Final Environmental Impact Statement

Agency/Organization	Summary of Comment Submittal	Region of Concern	BLM Response
U.S. Environmental Protection Agency, Region	Recommend additional explanation regarding the selection of an Agency Preferred Alternative that is considerably different from the environmentally preferable action alternative in Segment 1	Oregon	<p>As explained in the Final EIS (Section 2.8), the criteria used to help identify the Agency Preferred Alternative are like those criteria used to identify the environmentally preferable alternative, but with additional considerations. Because “a high percentage of the land that would be crossed by the proposed transmission line [project-wide] is privately owned (70 percent private or state, 30 percent federally administered), the BLM collaborated extensively with the affected counties to identify a route that would be responsive to their concerns.” In Segment 1, the percentage of private lands crossed is much greater—approximately 87 percent. Most of the remaining 13 percent of the lands crossed by alternative routes and variations are federal; most notably, approximately 7 miles of the NWSTF Boardman and 4.5 miles of the Wallowa-Whitman National Forest. The expanded explanation requested by the Environmental Protection Agency follows.</p> <p>The Environmentally and Agency Preferred Alternative identified in Segment 1 in the Draft EIS was the Longhorn Alternative (Draft EIS Section 2.5.2). Comments on the Draft EIS submitted by local businesses and landowners, local governments, the Oregon Department of Land Conservation and Development, Oregon Department of Agriculture, Columbia-Snake River Irrigators Association (Final EIS Section 2.1.1.3) criticized both the Longhorn Alternative and the Longhorn Variation (East of Bombing Range Road Alternative in the Final EIS), expressing concern about the potential effects on irrigated agriculture and related economic effects. Several commenters advocated for a route-variation option on the west side of Bombing Range Road on federal land withdrawn for military use by the Navy (Final EIS Section 2.1.1). In response, the BLM and Applicant coordinated with local stakeholders and the Navy to develop the West of Bombing Range Road alternative variation.</p> <p>Other comments on the Draft EIS from Umatilla County; the WildLands Defense; a consortium letter from the Oregon California Trail Association, Hells Canyon Preservation Council, Oregon Wind, and WildEarth Guardians; Glass Hill Coalition; Elk Song Ranch; the Confederated Tribes of the Umatilla Indian Reservation; and several individuals recommended the route-variation option parallel to Interstate 84 in Umatilla County and/or existing transmission lines. The intent was to reduce impacts on privately owned lands along the Draft EIS alternatives (Longhorn Alternative, East of Bombing Range Road Alternative), consolidate linear infrastructure to avoid proliferation of utility corridors, and site the proposed transmission line in areas already disturbed by previous development (Final EIS Section 2.1.1.3). In response to these Draft EIS comments, the BLM requested that the Applicant develop route variations</p>

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			<p>colocated with Interstate 84 and/or the existing 230-kV transmission line in that area.</p> <p>Between the Draft EIS and Final EIS, the BLM reviewed the alternative route variations with the tribes and cooperating agencies (both state and local government agencies) and, because of the compelling preference for a variation west of Bombing Range Road by the stakeholders who would be affected most directly by the alternative routes and variations in Segment 1, extensive additional collaboration was conducted. This collaboration with the cooperating agencies resulted in further refinements to the West of Bombing Range Road alternative variation to develop a solution acceptable to the stakeholders. The BLM and Applicant coordinated with local stakeholders, local and state government, and the Navy to develop the alternative variation to (1) repurpose the existing use area currently occupied by the BPA 69-kV transmission line on the NWSTF Boardman, (2) avoid airspace conflicts by complying with the Navy’s 100-foot height restriction for transmission lines, (3) avoid environmentally sensitive areas on the NWSTF Boardman (i.e., Resource Natural Area B, Washington Ground Squirrel Resource Management Area, and traditional cultural properties), and (4) avoid crossing private lands and agricultural operations east of Bombing Range Road for approximately 7 of the 11 miles along the NWSTF Boardman boundary. In addition, Morrow and Umatilla counties coordinated to identify a variation continuing south from the West of Bombing Range Road Alternative variation that would minimize effects on wind-farm development. Proceeding east, south of the Applicant’s Proposed Action Alternative, the variation identified by the counties crosses private lands and does not parallel an existing transmission line, but is in an area where the terrain is not conducive to development and sensitive environmental resources are not as prevalent as along other alternatives and variations in Segment 1 (except the Interstate 84 alternative variations).</p> <p>Regarding the Interstate 84 alternative variations, the Applicant attempted to site the alignments of the variations in a narrow corridor between the Interstate 84 right-of-way and/or between the existing 230-kV right-of-way and the existing agricultural operations (pivot and other mechanized irrigation). While the western portion of the Interstate 84 variations (1) would not be subject to the NWSTF Boardman height restrictions, (2) would avoid or minimize environmental effects in the already-disturbed area, and (3) avoids most of the pivot and other mechanized irrigation, the alignments would cross several parcels of private land; (4) could constrain development of potential future agricultural use of those private lands, which could result in adverse economic effects; and (5) may not comply with Oregon Department of Environmental Quality noise-control standards in Oregon Administrative Rule (OAR) 340-35-0035, <i>Noise Control Regulations for Industry and Commerce</i>, which will be</p>

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			<p>determined for the selected route for the Oregon Department of Energy, Energy Facility Siting Council process.</p> <p>Therefore, based on comments on the Draft EIS, alternative route variations were developed in Segment 1 to respond to the concerns expressed: (1) West of Bombing Range Road alternative variation that would repurpose approximately 7 miles of an existing utility corridor on federal land, thereby reducing the amount of private lands crossed and potential effects on existing agricultural operations and (2) Interstate 84 alternative variations that would cross lands already disturbed by development thereby avoiding or minimizing effects on sensitive environmental resources, but crossing several private parcels, though avoiding agricultural operations to the extent practicable. Because of the compelling preference for a variation west of Bombing Range Road by the stakeholders who would be affected most directly by the alternative routes and variations in Segment 1 and because a high percentage of the lands in Segment 1 are private, the West of Bombing Range Road alternative variation was identified as the agency preferred.</p>