

COMMENT(S)

RESPONSE(S)

L1	Baker City, Oregon
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comment@boardmantohemingway.com

From: Mike Kee <mkee@bakercity.com>
Sent: Thursday, March 19, 2015 8:47 AM
To: comment@boardmantohemingway.com
Subject: B2H

- To Whom it May Concern;
- L1a [The City of Baker City does not support the current siting of the B2H line due to the fact that the proposed site is within several miles of the Baker City airport and may interfere with the flight path of aircraft as they land and take off from the airport.
- L1b [As of yet the health issues which are caused by these type of power lines are unknown, many believe that they are directly attributable to the cause of cancer. The BLM should consider all available research on the health effects of those who live near power lines.
- L1c [More of an effort should be placed on siting the line on public ground and minimizing the impact that the proposed line will have on private ground.
- L1d [The BLM should place a great value on the natural beauty and historical significance of the Baker Valley. There is a reason the BLM sited the Oregon Trail Interpretive Center where it is today. It is because historically that is more or less the view pioneers on the Oregon Trail first saw of the Baker Valley. The proposed site goes directly through that view as if the Oregon Trail had never happened.

Thank you
Mike Kee, City Manager

Mike Kee
 Baker City City Manager
 P.O. Box 650
 Baker City OR 97814
 541-524-2040
mkee@bakercity.com

- L1a [Alternative analysis has been revised to reflect comments on the Draft EIS. The consideration of land use (including airports and airstrips) has been incorporated in to the new process for consideration of alternatives.
- L1b [Comment noted.
- L1c [Comment noted.
- L1d [Comment noted.

COMMENT(S)

RESPONSE(S)

L2

City of Boardman, Oregon

comment@boardmantohemingway.com

From: Karen Pettigrew <PettigrewK@cityofboardman.com>
Sent: Thursday, March 19, 2015 11:08 AM
To: tgersch@blm.gov; comment@boardmantohemingway.com
Subject: B2H comments
Attachments: BLM letter B2H.pdf

Tamara,
You will find our attached comments and the original will be in the mail today.
Thank you for your consideration.

Karen Pettigrew
City Manager
City of Boardman, Oregon
PH. 541-481-9252

COMMENT(S)

RESPONSE(S)

L2

City of Boardman, Oregon (cont.)



City of Boardman

200 City Center Circle
P.O. Box 229
Boardman, OR 97818
Phone: (541) 481-9252
Fax: (541) 481-3244
TTY Relay 711
www.cityofboardman.com

March 19, 2015

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

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

We write to submit our comments in regards to the B2H Project and in opposition to the Agency Preferred Alternative (i.e. Longhorn Variation) and the Longhorn Alternative. The City Council of the City of Boardman have requested these comments to the B2H Transmission Project Draft Environmental Impact Statement. In light of glaring deficiencies in the EIS process; adverse effects of the project on unique, irrigated farmland; and the Bureau of Land Management's (BLM's) failure to consider routing alternatives that would largely avoid impacting high-value irrigated farmland, City of Boardman respectfully submits the following comments:

1) Water Pollution Control Facility Permit Impacts

The City of Boardman may have impacts to the City of Boardman Wastewater operations with a Water Pollution Control Facility permitted operation of effluent land application by center pivot delivery to irrigated crop land. Due the proximity of the Longhorn substation location it is difficult to determine the potential of loss of this land. The loss of land application area would be detrimental to this facility and reduce treatment capacities for the City of Boardman.

L2a

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

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

L2b

In light of BLM's late selection of the Longhorn Variation as the Preferred Alternative, local landowners who have been involved with this process for years are scrambling to meet the March 19th deadline. Because 90 days is an unreasonable time to review, understand, and react to the

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L2a [Comment noted.

L2b [The minimum comment period is 60 days; an additional 30 days was provided. Also, Draft EIS public meetings were held. Please refer to Section 4.3 for a discussion of the public participation process.

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L2	City of Boardman, Oregon (cont.)
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L2b route changes the B2H Project continues to make, a 60-day extension on the comment period is a reasonable request given the size and scope of the consequences of this transmission line. Additional time to submit comments will allow City of Boardman, as well as other interested and impacted parties, to further assess the facts and circumstances surrounding the B2H Project and provide relevant input into the determinations involved in the B2H Project.

3) The DEIS Underestimates the Effects of the B2H Project on Surrounding Agricultural Land

L2c The DEIS is unclear about the impact of the B2H Project on prime, irrigated farmland and appears to gloss over the dire economic losses on local farmers. The DEIS contains numerous inconsistencies regarding affected agricultural land and requires clarification. See, e.g., DEIS § 3.2.6.6 at 3-438, // 29-30.

L2c The Columbia-Snake River Irrigators Association (CSRIA) estimates that impacts to irrigated farmland during both construction and operations will be substantial -- in the range of 350 to 1,050 acres. Technical Memorandum from Darryll Olsen, CSRIA, to Tamara Gertsch, BLM at 3 (Mar. 17, 2015). The CSRIA, through a technical expert, recently estimated that the fair market value of irrigated farmland in the region is \$7,500 - \$10,000 per acre. *Id.* Thus, the total value of impacted irrigated agriculture would be approximately \$2.6 million to \$10.5 million, and the estimated present value of associated regional income loss would be about \$12.5 million to \$17.4 million. *Id.* at 4. The DEIS improperly characterizes these economic impacts as "low," when nothing could be further from the truth. See DEIS § 3.2.6.6 at 3-439, // 11-13.

L2d The DEIS is also misleading because it claims that the Longhorn Variation and Longhorn Alternative will impact less prime farmland than the Proposed Action. This is inaccurate because the DEIS's acreage figures mistakenly focus on so-called "prime" farmland that theoretically *could* be farmed rather than actual irrigated farmland that is currently in use. BLM's reliance on theoretical farmland suggests a mistaken belief that irrigated farmland can simply be replaced. However, this is not the case, as irrigated farming is highly dependent on soils, geography, water deliver, and irrigation conditions -- lost farmland cannot merely be moved to or recovered in other locales. Given the unique circumstances required for irrigated farming, BLM's concession in the DEIS that the Proposed Action will disturb 32 *more* acres of irrigated agriculture than the Proposed Action directly contradicts its claim that the Longhorn Variation will impose less harm on agriculture land than the Proposed Action. See DEIS at 3-438, // 29-30. Indeed, the Longhorn Variation and Longhorn Alternative will impose greater harm on irrigated farming than any of the other alternatives.

4) The DEIS' Cumulative Impact Analysis is Deficient

L2e As BLM is aware, activity for wind and other energy projects in Morrow and nearby counties remains high. The B2H Project presents a continuing threat to surrounding farmland because it potentially creates a transmission line corridor straight through productive irrigated farmland. This is a particular concern because Oregon law provides that one of the factors in evaluating whether a project should be granted an exception to allow siting in areas designated for exclusive farm use is whether the project uses an existing right of way. See ORS 215.275. Thus, there is a high likelihood that this corridor will continue to expand and in turn consume additional farmland to meet increasing demands for transmission capacity.

L2f In light of the above, the DEIS's cumulative impact analysis is deficient because it fails to address the cumulative impact of the B2H Project when considered in conjunction with the various wind energy projects proposed in the region. For instance, the DEIS omits discussion of the proposed 500 MW Wheatridge Wind Energy Facility, which has provided notice that it may connect to the grid

L2c The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7.

L2c The economic analysis in Section 3.2.17 includes data on effects to irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

L2d The analysis of impacts on agriculture for all alternatives in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7.

L2e The analysis has been expanded to address indirect effects that may result in included growth related to the changes in the pattern of land use, growth rate, and related effects on air and agricultural lands and other natural systems, including ecosystems. Potential for induced development would depend on future decisions by the cities and counties in the B2H Project study area through their planning and zoning authorities and processes. See Section 3.2.6 for discussion regarding compliance of the B2H Project with existing zoning and land use plans.

L2f See next page for response to L2f.

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L2	City of Boardman, Oregon (cont.)
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L2f through the Longhorn Variation corridor. The Wheatridge project should have been included and was inexplicably absent from the DEIS. Moreover, we understand that additional energy projects, including Perennial Windchaser and Ella Butte, could potentially utilize the transmission corridor created by the Longhorn Variation based on their location. Together, these projects generate an influx of power and create a risk of further cumulative impacts to irrigated farmland along the transmission corridor. We urge BLM to consider these impacts in detail and carefully weigh the severe effects on nearby farmland in light of other feasible routes such as the Slatt Alternative as described below.

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

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

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

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

Respectfully submitted,

 Karen Pettigrew
 City Manager

The City of Boardman is an equal opportunity provider and employer.

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

L2f Regarding consideration of the Slatt Substation, in a letter dated July 23, 2015, the Bonneville Power Administration, the sole owner of the Slatt Substation, informed the BLM that the Slatt Substation has no open 500-kV bays and there are “severe physical constraints” to expanding the substation to accommodate the B2H Project. Also, because the Slatt Substation is wholly owned by the BPA, the BPA’s policy and rate schedules would require that BPA charge the Applicant and PacifiCorp for use of the substation (which would be passed onto the rate payers. In addition, a thorough study would have to be completed to determine whether the Slatt Substation could meet the B2H Project’s objectives. Because the Slatt Substation is seriously constrained and technically infeasible, and does not meet the interests and objectives of the B2H Project and its partners, consideration of the Slatt Substation and an alternative route to the substation was eliminated from detailed analysis in the Final EIS (Final EIS Section 2.5.4.4).

L2g The impacts on prime farmland along the Longhorn Alternative have been updated. Idaho Power has indicated that most pivots can be used under the transmission line in the right-of-way. The transmission line structures would be located outside of pivots wherever possible, and their locations would be selected in coordination with the landowner so as to minimize impacts on operations and irrigated farmland. Where structures cannot be located outside of pivots, landowners would be appropriately compensated. Refer to Section 3.2.7 for further discussion of impacts on prime farmland, pivot irrigation, and irrigated agriculture.

COMMENT(S)

RESPONSE(S)

L3

City of Bonners Ferry, Oregon



COMMENT FORM



Date: 1/12/15
 First Name: Stephen Last Name: Boorman
 Organization or Affiliation (if any): City of Bonners Ferry
 Address: P.O. Box 149
 City: Bonners Ferry State: ID Zip: 83805
 E-mail address: sboorman@bonnersferry.id.gov Phone: _____

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

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

Comments must be submitted by March 19, 2015.

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

we believe this is a valuable and necessary project for the state of Idaho, particularly the public power utilities who are BPA customers and served by Idaho Power.

We appreciate the diligence that the parties have invested in conducting this process with respect to private property owners and the environment.

No response needed.

COMMENT(S)

RESPONSE(S)

L4

City of Greenleaf, Oregon



CITY OF GREENLEAF

20523 North Whittier Drive
Greenleaf, Idaho 83626



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

16 March 2015

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) PUBLIC
COMMENT

Greetings!

The City of Greenleaf has attended many of the Boardman to Hemingway (B2H) meetings, particularly early on when alternative routes were being discussed and determined. The city has continued to stay informed by periodically monitoring progress and mapping through the B2H website. The city appreciates the openness of the process, and this opportunity to comment in support of the project.

This transmission line is a necessary improvement to regional electrical infrastructure.

It was apparent that environmental groups were largely absent at the multiple meetings attended by the city, and notable that the many farmers, ranchers, and other property owners in attendance had genuine concerns for protecting the environment and having a safe transmission line along a responsible route.

While real environmental concerns obviously need to be mitigated whenever they are discovered throughout the process, it is hoped that latecomer environmental groups are not allowed to prevent this critical infrastructure from moving forward.

Respectfully submitted,

Brad Holton
Mayor
City of Greenleaf

BH/lcb

No response needed.

COMMENT(S)

RESPONSE(S)

L5

City of Parma, Idaho



COMMENT FORM



Date: JAN 16, 2015
 First Name: NATHAN Last Name: LEIGH
 Organization or Affiliation (if any): CITY OF PARMA
 Address: 305 N 3RD ST. P.O. Box 608
 City: PARMA State: ID Zip: 83660
 E-mail address: nlegh@parmacityhall.net Phone: 208-722-5138

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

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

Comments must be submitted by March 19, 2015.

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

- ON JAN. 13, I ATTENDED THE OPEN HOUSE IN MARSING AND VISITED WITH SEVERAL PERSONS ASSOCIATED WITH THE B2H PROJECT.
- ALTHOUGH THE PROJECT HAS NO DIRECT BEARING ON THE CITY OF PARMA, I WOULD TAKE THIS TIME TO RESPOND.
- FIRST, I SUPPORT INFRASTRUCTURE UPGRADES IN GENERAL. I SUPPORT THIS PROJECT SPECIFICALLY BECAUSE IT WILL ALLOW MORE AND GREATER FLEXIBILITY TO SHIFT POWER USED AS SEASONAL DEMAND REQUIRES. THE ADDED BENEFIT TO THE TREASURE VALLEY REGION IS THAT A MORE STABLE POWER SUPPLY WILL BE AVAILABLE. THAT IS AN ECONOMIC BENEFIT THAT IS CRITICAL TO LONG TERM ECONOMIC HEALTH.
- AS MAYOR OF OUR SMALL COMMUNITY, I AM FRUSTRATED BY THE GLACIALLY SLOW PROCESS THAT HAMS STRINGS PROJECTS.

COMMENT(S)

RESPONSE(S)

L5

City of Parma, Idaho (cont.)

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

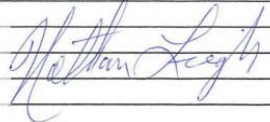
Affix
stamp
here

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

----- (fold along line and tape edges to mail) -----

L5a

THE PERMITTING PROCESS OFTEN STRANGLES GOOD
WORTHWHILE, AND WELL MEANING PROJECTS AND
PLACES UNDUE BURDEN ON THE PERMITEE. A
CERTAIN AMOUNT OF OVERSIGHT IS GOOD,
HOWEVER, AT SOME POINT ONE WOULD HAVE
TO WONDER WHEN OR IF THE PROJECT WILL
EVER GET THROUGH THE BURDENSOME PROCESS.
UNFORTUNATELY, I HAVE NO IDEA ABOUT HOW
TO MAKE IT BETTER. I WISH I DID.



L5a

Comment noted.

COMMENT(S)

RESPONSE(S)

L6

Idaho Falls Power

comment@boardmantohemingway.com

From: EnviroLytical - B2H <info@envirolytical.com>
Sent: Friday, January 23, 2015 8:54 AM
To: comment@boardmantohemingway.com
Subject: New Communication: Thank you for the receiving and reviewing comments from various stakeholders. Idaho Falls Power is a not-for-profit, municipal electric utility that serves over 27,000 customers in

Bear Prairie <bprairie@ifpower.org>
<https://el2.envirolytical.com/communication/view/97290>
Thank you for the receiving and reviewing comments from various stakeholders.

Idaho Falls Power is a not-for-profit, municipal electric utility that serves over 27,000 customers in the city of Idaho Falls. Our city relies on the Bonneville Power Administration for a majority of the power that we deliver to our residents and businesses. Access to this resource is an economic must for our city. The transmission agreement in which BPA historically used to deliver this power will terminate effective July 2016. B2H is the most economic and reliable replacement to this transmission agreement. Reliable and cost effective electricity is the lifeblood of our community.

L6a [The need for the timely completion of this project cannot be overstated. We urge the BLM and other agencies to continue to work together in order to move this project forward. We also support the Longhorn Variation alternative since this would allow direct interconnection to federal power resources.

L6a [Comment noted.