

Appendix F Scoping Comments and Responses

Gateway West Environmental Assessment

Scoping Comments and Responses

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
EA-1	1	8-28-17	Sherry Penny	I live very close to the Hemingway Substation in Owyhee County. It can be very loud at different times of the day. I am concerned that once all the new lines etc come in, it will be even more obnoxious to the ears.	The BLM recognizes that this is a concern to residents in the vicinity of the substation. During the RAC process, an alternative was explored under which both segments would parallel the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV line and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek. See Section 3.23 of the FSEIS for a discussion of noise effects.
EA-2	1	8-30-17	B Ker	i am totally opposed to approval of this newest pipeline. the fact is america is being plagued by pipelines all over far above our national need for such pipelines. the fact is rich white men want to sell out america by ripping up america and selling out our energy on our national lands to china or other foreigners and make big money doing it. our national lands are all at risk from these development. we are opposed to rich white men being allowed to get away with this theft of our national lands and the devastation of those lands for unnecessary drilling and pipelines. these drilling and pipelines are far far above the needs of the usa.	This EA considers Segments 8 and 9 of the Gateway West transmission line, which is designed to provide electrical power to the applicants' customers in the United States.
EA-3	1	9-1-17	Union Pacific Railroad – Renay Robison	UPRR objects to any route that runs parallel within three hundred (300) feet of railroad right of way, measured from the centerline of our track.	Segment 8 of the Proposed Route crosses the railroad on BLM-managed land. Segment 9 does not cross the Union Pacific line on BLM-managed land. Neither of the routes parallel the railroads within 300 feet of the

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				All parallel lines must be three hundred (300) feet off of track. UPRR also objects to any route that crosses its right-of-way. UPRR will only allow crossings of railroad right of way at a degree of ninety (90°), or as close to ninety degrees (90°) as possible without going beyond the degree range of forty-five (45°). UPRR does not allow for any structures to be erected on railroad right of way. All crossings and parallel lines will require a future agreement with UPRR as to how to construct and maintain.	railroad track. No structures would be placed within the railroad easement. Information regarding Project effects on railroads is included in Section 3.19 – Transportation of the 2016 FSEIS. The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.
EA-3	2	9-1-17	Union Pacific Railroad – Renay Robison	This objection is based upon the lack of detailed information to fully understand the project and the impact this station and wirelines may have on Railroad property. If the above conditions cannot be met, all consideration of the project should be subject to a full mitigation study at the expense of Idaho Power and Rocky Mountain Power. Any concerns resulting from the mitigation study must be required to be addressed to avoid any damage to UPRR's signal and communication facilities.	See the response to the previous comment.
EA-3	3	9-1-17	Union Pacific Railroad – Renay Robison	Safety is the primary driver for this requested requirement. Unmitigated high voltage power lines in close proximity to railroad tracks can have an adverse affect upon railroad signals, especially grade crossing warning devices. For crossings in the vicinity of switches or signal facilities (especially when not crossing at a 90 degree angle), inductive interference has the potential to disrupt signal system in the track, causing failure in track signals, including highway grade crossing warning devices. In general, the more power that flows through the wires, the greater effect it has upon the railroad equipment. UPRR reviews proposed installations on or near its right of way by examining factors such as the distance between the wire and the rails and how far the power line parallels the tracks to evaluate the potential for the power lines to affect the safe operation of railroad signaling equipment.	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.

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EA-3	4	9-1-17	Union Pacific Railroad – Renay Robison	Other adverse affects on railroad equipment come from ground fault events. These events cause a great deal of energy to flow through the ground from the power company's towers and/or substations, through the rails, and directly into signal equipment. Such events can cause tens or hundreds of thousands of dollars worth of damages during a single event. These occurrences can cause the destruction of railroad equipment for several miles. In one area, well documented events have repeatedly destroyed grade crossing warning devices for several miles. In addition to the potential to cause damage to railroad equipment, railroad personnel or anyone else touching the rails can be subject to injury from electrical shock.	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.
EA-3	5	9-1-17	Union Pacific Railroad – Renay Robison	Information and application forms concerning requests for wireline crossings across UPRR's property may be found on the internet at: http://www.up.co111/real estate/utilities/index.htm . Engineering specifications regarding crossings can be found as well at http://www.up.com/real estate/utilities/wireline/wirespecs/index.htm . Proposals that call for placement of improvements on or under our property require greater evaluation and tend to be more difficult to approve, particularly where wirelines parallel our tracks with voltage. Further information regarding requests for such encroachments may be found on our website at: www.uprr.com/reus/encroach/procedure.r.shtm and www.uprr.com/reus/encroach/encguide.shtm . In all instances, there must also be a meeting of the minds on compensation for the right to cross the property.	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.
EA-3	6	9-1-17	Union Pacific Railroad – Renay Robison	By this letter, UPRR requests Idaho Power and Rocky Mountain Power to abide by the conditions presented above. If it has questions on requirements, please encourage its representatives to reach out to me. UPRR reserves its rights to present additional comments on the proposal and to seek any legal, administrative, and other remedies that may be	The BLM recognizes that the railroad easements have established rights. The Proponents are responsible for coordinating with the railroad.

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				necessary to preserve UPRR's franchise and property rights.	
EA-4	1	9-4-17	Oregon-California Trails Association (OCTA)– Jerry Eichhorst	If I understand the changes which have been required to the routing of the Gateway West transmission line across southwestern Idaho due to the Consolidated Appropriations Act of 2017, the remaining two possible routes are routes 8 and 9 as shown in red from the EIS map below. It is somewhat difficult to tell exact details due to the large scale of the map, but both of these routes appear to have several conflicts with alternative routes of the Oregon Trail in southwestern Idaho. This causes me and the Idaho chapter of the Oregon-California Trails Association a great deal of concern.	Effects on national historic trails are discussed in detail in Section 3.1 and Appendix J of the 2016 FSEIS. Also see the photo simulations in Appendix E.
EA-4	2	9-4-17	OCTA – Jerry Eichhorst	Route 8 Revised appears to closely follow the North Alternate Oregon Trail from the area north of Bliss towards its junction with the main Oregon Trail northeast of Mountain Home. At that point, the route appears to follow the Oregon Trail northwest until it turns west towards Melba. There are excellent trail remnants along this entire stretch. I am concerned about possible damage to the trail routes along this corridor and destruction of the emigrant view shed in this area by the addition of power line structures in close proximity to the North Alternate Oregon Trail and the main Oregon Trail. The North Alternate is going before Congress to be added to the inventory of National Historic Trails as the main Oregon Trail already is. This route has been well-documented and a detailed map of the North Alternate route is available from the National Park Service. I have attached a copy of this map for your convenience. More detailed maps of the proposed Gateway West route may provide enough detail to determine how close to the North Alternate and the main Oregon Trail this proposed route actually is.	Detailed maps of the routes in relation to national historic trails are included in Appendix J of the 2016 FSEIS. Also see the photo simulations in Appendix E.
EA-4	3	9-4-17	OCTA – Jerry Eichhorst	Route 9 Revised appears to cross and straddle the South Alternate Oregon Trail in the area of the Bruneau River arm of CJ Strike Reservoir.	Detailed maps of the routes in relation to national historic trails are included in Appendix J of the 2016 FSEIS.

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				There are excellent remnants of the South Alternate Oregon Trail in this area and my concern would be possible damage to these trail remnants and destruction of the emigrant view shed in this area by the addition of power line structures in close proximity to the trail.	
EA-4	4	9-4-17	OCTA – Jerry Eichhorst	I am opposed to any routing of the power line parallel to and within close proximity to the Oregon Trail, North Alternate Oregon Trail, and South Alternate Oregon Trail in these areas. I trust that the utmost care will be utilized when crossing the emigrant trails along the Gateway West route and that the trail routes will not be used for construction equipment to travel on.	Comment noted.
EA-4	5	9-4-17	OCTA – Jerry Eichhorst	I would be happy to meet with the appropriate BLM personnel to discuss the routing on more detailed maps where trail route and proposed power line routes can be viewed in more detail.	Detailed maps of the routes in relation to national historic trails are included in Appendix J of the 2016 FSEIS.
EA-5	1	8-29-17	Kathryn Christie	The map is not clear enough for me to tell if Alternate 1 Revised Segment 8 goes over and/or near our 17 acres of property located at Simco Rd and I-84 freeway. The owner of record is shown as MAJIK LLC (although I think Elmore County property tax records have slight typo in this name).	As currently proposed, the line passes near but not across this property. This information was sent directly to you.
EA-6	1	9-14-17	Adrienne Patridge	I have lived in Idaho for most of my entire life. We have a beautiful, clean, state. The desert land of Idaho will continue to display its unique elegance if we preserve the land, the sage brush and water on the land, and the sky above the land. Consequently, the animals living in this area will continue to thrive.	Comment noted.
EA-6	2	9-14-17	Adrienne Patridge	I noticed there was an opportunity to leave public comment concerning the Gateway West Transmission Line Project. While I do deem it necessary to provide a proficient power source to the community, I hope we will consider the Birds of Prey in those decisions. They are a beautiful addition in the sky above us for anyone who chooses to look up. I see more and more, they are losing what they need most to thrive in their habitat. Less sagebrush, more cheat grass,	Comment noted.

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				houses, power lines, etc. We need to consider how what we do matters when making decisions concerning the population growth of the human species. I don't have an answer except to say there are those trained and necessarily equipped to know how to best serve the community AND our natural environment. Please take this to heart in any decisions moving forward. Our future depends on it.	
EA-7	1	9-11-17	Robyn Thompson	Addresses impacts to stakeholders residing in Guffy, Idaho via the construction of Segment 8: Also known as Summer Lake Option 1 recommended by the Boise District Resource Advisory Council, May 30, 2014. Also known as Alternative 1: Draft Supplemental EIS, March 11-June 9, 2016. March 27, 2014 the BD RAC subcommittee participated in a Field Tour paid for by the Governor's Office, lead by Mr. John Chatburn, Administrator, Idaho Department of Energy. The subcommittee parked on the north side of Hwy 78 where the existing 500 kV line crosses Hwy 78. An Owyhee County Task Force member asked if it would be possible to site the new 500 kV line, which will be 250' north of the existing line, could the "new" line after crossing the Hwy cross over the existing line. Then parallel the existing line southwest to the substation. This needs to happen to minimize impacts to private property – homes – otherwise the "new" line would go right over the top of some homes. Mr. Chatburn explained the lines could not cross. However the "new" line could be connected to the first 200' tower south of Hwy 78 – that line would then become segment 8. The new towers constructed would then transmit the power that the existing line currently transmits.	During the RAC process, an alternative was explored that continued the DC 500/138-kV rebuild north to the existing 500-kV line where both segments then paralleled the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek.
EA-7	2	9-11-17	Robyn Thompson	This technique is already utilized regarding Segment 8 to accommodate the Orchard Combat Training Center. We are enclosing a map for clarification.	The existing 500/138-kV line north of the training area is being rebuilt to avoid having the new 500-kV line cross over the existing line.
EA-7	3	9-11-17	Robyn Thompson	Addresses impacts to stakeholders residing in the China Ditch subdivision. These property owners	During the RAC process, an alternative was explored that continued the DC 500/138-kV rebuild north to the existing 500-kV line where both segments then

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				<p>have been very vocal since the release of the DEIS, 2011. Idaho Power owns parcels for the purpose of siting Segment 8. These impacted stakeholders vehemently oppose siting Segment 8 on these parcels. Utilizing these parcels would sandwich some landowners between 500 kV lines.</p> <p>These Owhyee County residents ask that all lines; the existing 500 kV line, Segment 8 and Segment 9 enter on the south side of the Hemingway substation.</p> <p>Mr. Keith Georgeson, engineer, Idaho Power and member of the RAC subcommittee, confirmed with his superiors that indeed it is possible from an engineering standpoint to bring all of the 500 kV lines into the substation utilizing only the south side.</p>	<p>paralleled the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek.</p>
EA-8	1	9-15-17	OCTA, Idaho Chapter – Walter Meyer	<p>Included are comments for the proposed routing of the Gateway West Transmission Line from C.J. Strike Reservoir, through the east side of the Birds of Prey Area, and to the Rabbit Creek area. Since the transmission line will be visible from and may cross remnants of the South Alternate of the Oregon National Historic Trail (NHT) in several locations, the following mitigating measures are recommended to minimize the adverse impacts.</p> <p>First, it is recommended that all NHT remnants on public land be closed by the BLM to all types of motorized use.</p>	<p>Mitigation of project effects to national historic trails would be implemented in accordance with Manual 6280 (see Appendix J of the FSEIS). Historic properties would have site-specific Historic Properties Treatment Plans (HPTPs) as discussed in Section 3.1.2.4 of the 2016 FSEIS. The BLM will collaborate with cooperators, agencies and other interested parties to develop appropriate mitigation.</p>
EA-8	2	9-15-17	OCTA, Idaho Chapter – Walter Meyer	<p>C.J. Strike Reservoir Area</p> <p>Since the transmission line will be visible from and may cross NHT remnants on the Bruneau Arm and near the Cove Recreation Site, it's recommended that a recreational trail head with vehicle parking and informational signing be provided on the north side of Hwy 78 in Sections 11 or 12, T.6S., R.4E. to encourage public access to nearby NHT remnants on BLM land.</p>	<p>Thank you for the comment; Developing trailheads is one possible mitigation measure that is being considered.</p>
EA-8	3	9-15-17	OCTA, Idaho Chapter – Walter Meyer	<p>Murphy Flat Area</p> <p>The transmission line should be located as far north of the south Alternate remnants as possible</p>	<p>Thank you for the comment; Developing trailheads is one possible mitigation measure that is being considered.</p>

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				to minimize visual impacts. Since the transmission line will still be visible from the NHT, it is recommended, to help in mitigating adverse impacts, that a recreational trail head be developed at the South Alternate Oregon Trail's crossing at the North-south county road in the SE ¼, Sec. 34, T.2S, R.1W. Here, a livestock fence will need to be relocated around the parking area and a gate provided for non-motorized NHT access.	
EA-8	4	9-15-17	OCTA, Idaho Chapter – Walter Meyer	Although, probably not a mitigating measure, the BLM should acquire a rights-of-way across, or acquire through a land exchange, the private land in the SW ¼, Sec. 35, T.2S., R.1W. to allow for public access from the trail head to 3 miles of NHT remnants on BLM land toward Sinker Creek.	Purchasing easements from willing sellers is one possible mitigation measure that is being considered.
EA-8	5	9-15-17	OCTA, Idaho Chapter – Walter Meyer	Rabbit Creek Area Since the transmission line will be visible from and may cross south Alternate Oregon Trail remnants down Rabbit Creek and, also, on a variant South Alternate route between Rabbit Creek and Hwy 78, it is recommended that recreational trail heads be provided along the road down Rabbit Creek and along Hwy 78, a mile north of Murphy.	Thank you for the comment; Developing trailheads is one possible mitigation measure that is being considered.
EA-8	6	9-15-17	OCTA, Idaho Chapter – Walter Meyer	Again, probably not to be considered as a mitigating measure, the BLM should consider developing trail access from a trail head on Rabbit Creek through the N ½, Sec. 25 & 26, T.2S., R.2W. to NHT remnants on public land on Murphy Flat.	Thank you for the comment; developing trailheads is one possible mitigation measure that is being considered.
EA-9	1	9-21-17	Cat Creek Energy LLC – James Carkulis	This submission is in response to the Bureau of Land Management Notice of Intent to Prepare an Environmental Assessment released 28-August-2016 requesting public input to determine the relevant issues that will influence the scope of the EA. We very much welcome the reconsideration of the BLM's 19-January-2017 Record of Decision selecting the route described as Alternative 5 in the Final Supplemental EIS and support, in company with Idaho Governor Otter and Idaho Congressional Representatives	Comment noted

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				Labrador and Simpson, a Gateway West preferred route incorporating Segment 8, Alternative 1 ("Alt 1").	
EA-9	2	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>Cat Creek Energy, LLC ("CCE")'s direct interest in the location of Gateway West is a function of the fact that Cat Creek will be constructing a 750 MW pump storage hydro, wind, and PV solar integrated renewable energy generation facility adjacent to Anderson Ranch Reservoir in Mountain Home, Idaho, that will interconnect with the series of transmission in the Mountain Home, ID transmission corridor including the anticipated new 500 kV Gateway West transmission line. This integrated renewable energy facility will be the largest generation facility of any kind in the state of Idaho producing up to 2,467,000 MWhr annually contributing to and making a profound impact on the East-West transmission flow. Gateway West becomes an essential intertie in CCE's generator efficiency and Segment 8, Alt 1 is the best adaptation of any route to accommodate new generation, the first primary justification for the Gateway West project.</p>	Your development plans are noted.
EA-9	3	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>This said, our reasons for favoring Segment 8, Alt 1 are principled, not only having to do with the technical-economics factors, but also the general environmental pragmatic factors of paralleling an existing transmission corridor. CCE opposed the Alt. 5 route selection on the basis of the following biological considerations:</p> <ul style="list-style-type: none"> • Concern about the effects of other routes that are contrary to the objective and values for which the Morley Nelson Snake River Birds of Prey (MNSRBP) National Conservation Area was designated. The MNSRBP boundary is static, the airspace is not, and birds move in and out of the designated borders with aplomb. • The Morley Nelson Snake River Birds of Prey area already contains multiple major transmission corridors well known to both local 	Alternative 5 is no longer considered reasonable.

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				<p>and migratory avian populations. Birds have acclimated to them.</p> <ul style="list-style-type: none"> • The selection of the Alt 5 corridor south of the MNSRBP National Conservation Area would have increased near-term avian mortalities owing to its intrusion into an area that does not have many significant vertical features at present. • The Alt 5 route would have displaced more potential sage-grouse habitat than Alt 1 will. • Federal policy has advocated for the last few years to co-locate infrastructure for all the reasons above. Paralleling the current 500 kV Midpoint/Summer Lake PacifiCorp transmission line for Segment 8 bolsters those federal guidelines. • BLM policy should embody a “least harm” principle, and not, at least not primarily, a respect for jurisdictional boundaries and federal designations. Paralleling the existing PacifiCorp Midpoint/Summer Lake 500 kV Transmission Line is the least geographically intrusive and most avian-compatible route for selection. The PacifiCorp existing route, even by expanding the existing corridor embracing two additional transmission lines, is still less impactful on avian populations, including those resident in and migrating through the Birds of Prey area, than Alt 5 would have been. 	
EA-9	4	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>On the basis of the same biological considerations, CCE favors Segment 8, Alternative 1. It will be adjacent to an existent transmission corridor, i.e., not, as Alt 5 would, create new corridors through the area not yet impacted by power structures. This consideration should override any concerns relating to siting on public versus private lands and should in fact mitigate rather than increase impacts on visual resources and existing view sheds. Cat Creek Energy also favors Segment 8 Alt 1 from both the largest single generator and, by many times over, the largest load in Idaho perspectives:</p>	Comment noted.

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EA-9	5	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>As noted above, the Cat Creek Energy Storage & Renewable Generation Station facility, 25 miles north of Mountain Home, Idaho, commences operation in 2020 and will be the largest generator in Idaho at 750 MW [larger than the 585 MW installed capacity of the Brownlee Dam and mirroring its generating capacity potential at 2,406,000 MWhrs) and becomes the largest industrial load in Idaho at 890 MW. Its components include:</p> <ul style="list-style-type: none"> • 12 – 50 MW hydro turbines in a pump/generator configuration • 30- 3.65 MW wind conversion turbine generators • 186,000 PV solar panels equivalent to 40 MW (AC) max. capacity output • 72,600 MWhrs of energy storage capacity by way of a 100,000 acre-ft Upper Reservoir • A A switch/substation at Mountain Home in the transmission corridor connecting to both the 230 kV and the 500 kV transmission level systems. 	Comment noted.
EA-9	6	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>CCE is taking extraordinary measures to ensure minimum environmental impacts in its design including, but not limited to co-locating the dual-circuit 230 kV transmission line for the project alongside the current BPA 115 kV Anderson Ranch/Mountain Home transmission corridor.</p>	Comment noted.
EA-9	7	9-21-17	Cat Creek Energy LLC – James Carkulis	<p>The proposed Segment 8 Alt 1 route has several operational advantages that have to do with future needs and demands for existing or potential resource commodities and values, in particular for new renewable energy resources to curb carbon emissions in the WECC and western grid.</p> <ul style="list-style-type: none"> • Gateway West’s installation and function respond to a need for the expanded transmission of renewable energy resources. • PacifiCorp’s 1,280 MW proposed Wyoming wind farm generation will require such expansion, as will the next largest renewable generator on the system, the Cat Creek 	Comment noted.

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				<p>Energy facility. Segment 8, Alt 1 is the logical path to achieve the basic premise of why Gateway West is being proposed of providing new transmission for new generation in the most environmentally and prudent method. Segment 8, Alt 1 reduces the environmental impact for not only Gateway West, but also Cat Creek Energy and its interconnection route.</p> <ul style="list-style-type: none"> • There is at present no off-ramp or intertie from Midpoint to Hemingway substations on Gateway West. CCE would create an intertie between the 230 kV IPCo system, the current PacifiCorp 500 kV line, and Gateway West with the Alt 1 route. Given the increased use of crossing Idaho by PacifiCorp for energy transit and the continued growth in the Treasure Valley, this could prove invaluable in balancing transmission and provide for one more solution to any outage or constraint condition for those flows that will undoubtedly be present and stress the 230 kV system at some time in the near future. • Generation over-capacity, load following, and regulation are very real concerns for PacifiCorp's moving energy between its east and west control areas and to California, especially when there are constraints in individual entry points to CAISO. CCE is designed to serve as the indispensable storage and generator mechanism to balance supply and demand, thus alleviating these transmission side problems. Segment 8, Alt 1 paralleling the existing PacifiCorp 500 kV line, makes CCE a potential load and supply balancing facility for the majority of electricity flow across Idaho. 	
EA-9	8	9-21-17	Cat Creek Energy LLC – James Carkulis	For these reasons, one biological, the other technical/economic, the reconsideration of BLM's earlier decision is warranted and Cat Creek Energy enthusiastically and rationally supports (as do many others) Segment 8 Alt. 1 for the Gateway West Transmission Project. Having	Comment noted.

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				been in the business of developing renewable energy projects for years, and in the process, having earned a reputation for successfully completing environmentally-sensitive projects, I can attest that Segment 8 Alt. 1 is one that can be justified for its low environmental impact while reinforcing the basic reason why Gateway West is important; to promote and connect new generation.	
EA-10	1	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	Owyhee County has engaged in the Gateway West process since its onset and has provided numerous previous comments. We specifically reference our comments on the Draft SEIS as pertinent to this reconsideration action. During the tenure of Aden Seidlitz as Boise District Manager, BLM engaged Owyhee County under the FLPMA Coordination Provisions in resolving issues related to route segments crossing Owyhee County. That process led to the mutual agreement between Owyhee County and Idaho BLM on the preferred routing. Unfortunately, that mutual agreement was dismissed by officials in the BLM Washington DC office who selected routes that were unacceptable to both Owyhee County and the State of Idaho.	The BLM has coordinated with the County throughout the Gateway West Project. The BLM is aware of the County's preference for Alternative 1 and has noted this in the EIS and SEIS.
EA-10	2	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	We request that BLM engage Owyhee County in FLPMA Coordination as we work to select the route segments to complete the ROW mandated by the Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act. We will make ourselves and our staffs available to meet with BLM as frequently as necessary to ensure that the routes selected are appropriate to the needs of the citizens of Owyhee County and the energy transmission companies.	The BLM will continue to coordinate with the County, as it has throughout the Gateway West Project process.
EA-10	3	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi,	Owyhee County supports the routes selected by the Boise District RAC Gateway West Subcommittee on the basis of the careful study they applied to the problems associated with the routing and on the basis of the final products minimized impacts.	The routes being considered in this EA are the routes recommended by the RAC.

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			Jerry Hoagland, Joe Merrick	We believe that the routes selected by the RAC Subcommittee, with slight modification in the vicinity of the Hemingway Substation, is still the most viable route in that it minimizes impacts to private property and to the economy of Owyhee County.	
EA-10	4	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	We recommend changes to the routing of the entry into the Hemingway Substation as were discussed at the March 27, 2014 Boise District RAC Subcommittee Field Tour hosted by Mr. John Chatburn of the Governor's Office of Energy Resources and in other conversations with Mr. Keith Georgeson, Idaho Power Engineer and member of the RAC Subcommittee.	See the response below.
EA-10	5	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	<p>During that field tour, the group proposed an alternative means of routing the new line segments so as to parallel the existing high voltage line where it crosses Highway 78 in Owyhee County. The discussion led to a solution which minimizes impacts to Owyhee County homes which, absent the change, would have lines cross over homes.</p> <p>Residents of the China Ditch Subdivision have voiced concerns about the addition of the new Gateway West Segments to the impact the subdivision already suffers from the existence of the old high voltage line in the area. Mr. Georgeson has confirmed that, from an engineering standpoint, it is feasible and viable to route the lines into the Hemingway Substation from the south so as to minimize the impacts to the China Ditch subdivision.</p>	During the RAC process, an alternative was explored that continued the DC 500/138-kV rebuild north to the existing 500-kV line where both segments then paralleled the existing line to Hemingway, but that alternative was not recommended by the RAC and was not carried forward into the SEIS. An alternative alignment into Hemingway was discussed during the field trip mentioned in the letter. It was suggested that Segment 8 stop paralleling the existing 500-kV line south of Hemingway to join a common corridor with Segment 9 where both lines would enter Hemingway from the west to avoid additional impacts to the China Ditch subdivision. The Proponents considered this alignment impractical because it resulted in an additional crossing of the existing 500-kV and created significant difficulties and crowding coming into the substation. This alignment was also not recommended by the RAC because of potential impacts to Reynolds Creek.
EA-10	6	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	In our previous comment documents on various stages of the project, we have noted the impacts to Owyhee County and have noted items where we pointed out shortcomings in BLM's assessments of either benefits or impacts, such as erroneous numbers of miles of road construction related to the former preferred alternative. Those comments remain valid as Owyhee County comments for consideration in	The County's comments were considered in the EIS and SEIS. The BLM's response to the County's specific comments on the NEPA analysis and the transmission line location are documented in Appendix L in the 2016 FSEIS and Appendix D to the 2017 Record of Decision (ROD), in addition to scoping reports and in the original Gateway West EIS and ROD.

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				this scoping process and are part of the existing record. If BLM is unable to locate those comment documents we will provide them again upon request.	
EA-10	7	9-25-17	Owyhee County Board of Commissioners – Kelly Aberasturi, Jerry Hoagland, Joe Merrick	<p>We remain committed to preventing harm to the citizens and economy of our county and remind BLM that any crossing of private property requires action by the landowner under the Owyhee County Planning and Zoning Commission's process for obtaining Condition Use Permits. We have previously submitted statements from more than 70 landowners who indicated that they will not apply for or allow for a condition use permit for transmission line across their property.</p> <p>We support the private property rights of our citizens and will work with them to prevent adverse impacts to their properties. As stated above, the best way for BLM to achieve a reasonable and successful routing for the segments which connect Hemingway Substation to the ROW mandated by the Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act is to work with Owyhee County under FLPMA's Coordination provisions.</p>	Comment noted.
EA-11	1	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	<p>On behalf of the more than 76,000 member families of the Idaho Farm Bureau Federation, I offer these comments for the scoping of the reconsideration of the record of decision (ROD) approving Segments 8 and 9 for the Gateway West Transmission Line Project (GWTLP). For more than 75 years, the Idaho Farm Bureau has been recognized as the leading advocate for private property rights and prosperity which comes through the wise use of and responsible stewardship of our natural resources. Our members own property and operate farms, ranches and business in all 44 counties of the state, including those where Segments 8 and 9 are proposed. We thank the Bureau of Land Management (BLM) for this opportunity.</p>	Comment noted.

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EA-11	2	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	On June 9, 2016, the Idaho Farm Bureau submitted comments supporting the placement of Segments 8 and 9 of the GWTLP as presented in Alternative 1. We still support and take that same position today. Farm Bureau Policy supports the enhancement of electrical infrastructure in the state. We also support the GWTLP being routed through utility corridors on public land such as the Snake River Birds of Prey National Conservation Area (SRBOP).	The current EA includes the Alternative 1 routes. The BLM recognizes the Farm Bureau's position on this Project.
EA-11	3	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	<p>Since the initiation of this project, Alternative 1 was largely supported by the local stakeholders. The Owyhee County Task Force (OCTF) proposed a carefully considered placement of the GWTLP that balanced the needs of the local economy with protection of resources. The OCTF proposed that the transmission lines only cross private property where landowners were willing to allow a right-of-way to be negotiated, and where much of the route paralleled existing lines through the SRBOP.</p> <p>The Boise District Resource Advisory Council also recommended these routes, which Rocky Mountain Power and Idaho Power have adopted as their proposed routes. With two confirmed National Energy Corridors included in the SRBOP Resource Management Plan (RMP), and whereas, the utilization of these corridors is encouraged by BLM national policy and the RMP, it is only logical that segment 8 and 9 be sited on these locations as outlined in Alternative 1.</p>	We recognize that the task force has worked hard to resolve issues within Owyhee County. The BLM must consider issues beyond just meeting the needs of the county. The BLM engaged the local community and the RAC in a process which it hoped would lead to a consensus. The BLM continues to work reaching this goal.
EA-11	4	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	The Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act, which was incorporated by reference in the Consolidation Appropriations Act of 2017, directs the BLM to issue a right-of-way grant for the lands described in Alternative 1 for Segments 8 and 9. Alternative 1 is the only alternative that meets the specified and specific criteria of the act. We understand that the proposed route of Alternative 1 would require amendments to three BLM land use plans. Our local members are supportive of these	Your support for the routes and the associated plan amendments is noted.

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				amendments to see these transmission lines sited and routed appropriately and according to the Modification Act.	
EA-11	5	9-25-17	Idaho Farm Bureau Federation – Bryan Searle	Idaho Farm Bureau appreciates Congress recognizing and honoring the desires of the local stakeholders through the passage of the Modification Act. We look forward to working with the BLM through this reconsideration process and seeing the GWTLP completed. On behalf of the entire membership at the Idaho Farm Bureau, I thank you for your consideration of these comments and we look forward to our further involvement in the ROD reconsideration. Please contact Braden Jensen at 208-342-2688 if you have any questions regarding this topic.	Comment noted.
EA-12	1	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	The fact that a large number of BLM RMPs across the project area have to be amended to accommodate Gateway is a red light for PFA. As we have stated before, these amendments do nothing to protect or enhance. They allow the of sacrifice important, irreplaceable, and sensitive areas; including important wildlife habitat and visual resources, etc., by reducing or removing protective restrictions to allow the project. Project proponents are aware of this too. “The amendment(s) allowing a new Right Of Way(ROW) outside the existing corridors could result in cumulative impacts from future development, such as additional impacts on visual, wildlife, plant, cultural, and vegetation resources” Final Eviromental Impact Statement(FEIS) “In some cases, large areas of public lands would be reclassified, possibly allowing for additional projects without additional plan amendments. These impacts to land use planning goal would be considerable, particularly when taken together with other transmission lines request similar consideration, which if granted along the same route would create a large utility corridor. “ (SEIS)	The FSEIS and ROD recognize that there would be adverse impacts due to this Project. The BLM must balance the need to protect habitat with other requirements, such as the need to upgrade the electrical grid. This statement does not come from the project Proponents; it comes from the EIS, which was prepared by the BLM, not the Proponents.

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EA-12	2	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>We believe amending RMPs for segments 8 & 9 will set a precedent for projects in the future. The very thing the older, more thoughtful, and protective RMPs protect.</p> <p>“If the amendments associated with the Proposed Route is approved, other transmission lines proposed for this general area could choose to follow this same route; however, any additional transmission lines will go through the amendment process for this RMP direction because the amendment only applies to the proposed Project.” (FEIS)</p> <p>The proponents objectives “which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs” FEIS Section 1.3, can be done within the confines of existing energy corridors to increase efficiency and reliability. With the Exception of wind energy which is essentially costly and if sited in the wrong area, deadly to wildlife. As referenced “In a Rational Look at Energy” by Kimball Rasmussen, President and CEO of Deseret Power.</p> <p>”The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible.” (FEIS)</p>	<p>The land management plans are meant to be flexible. The planning rules anticipate that conditions and public needs change over time. Therefore, the planning regulations provide for amending plans as conditions and public needs change. The FSEIS considered the direct, indirect, and cumulative impacts from the plan amendments.</p> <p>Alternative 1 follows existing transmission lines where feasible. However, following existing transmission lines or utility corridors is not without serious impacts. The analysis in the EIS and SEIS considered these impacts.</p> <p>The Project objectives include creating a more reliable grid, which requires spacing lines out in such a manner that an adverse event, such as a fire, would not shut down power transmission across the area.</p>
EA-12	3	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Maps of the project are vague and confusing. These are only general maps that don't show exactly where the lines within segments 8 and 9 will be sited. In talking to BLM representatives and others, we are not alone in this.</p>	<p>It is correct that the lines on these maps do not show the exact location of the proposed lines. As stated in both the EIS and the SEIS, the lines are based on indicative design. The final locations will not be known until a route is selected, surveyed, and designed. The intent is to show a reasonable representation of the location.</p> <p>Detailed maps and photo overlays at a scale that shows individual buildings have been provided on the Project web site, and printed maps were provided at numerous public meetings throughout the Project, including the routes considered in this EA.</p>

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EA-12	4	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Construction of this transmission line across Hagerman Valley would be detrimental to large numbers of waterfowl and other migrating birds, including the Trumpeter Swan (BLM: Regional/State imperiled, Type 3) using this flyway, the Hagerman Wildlife Refuge, the Snake River, as well as the surrounding valley.</p> <p>This is a unique area because of the large bodies of water that don't freeze during the winter months thus making it very attractive to waterfowl and other migratory birds. PFA members enjoy and make extensive use of the Hagerman WMA because it provides a unique opportunity to view the many and varied bird species that frequent the area including Bald Eagles, Trumpeter and Tundra Swans, and numerous species of other waterfowl, not only during the winter, but throughout the entire year. PFA members as well as many others utilize the WMA for birding, hiking, study, and other recreational and aesthetic pursuits.</p> <p>PFA has taken an active interest in the WMA. As part of the nationwide Christmas Bird Count program, our chapter has conducted a bird census at the Hagerman WMA for over 40 years (see Appendix A).</p> <p>Fifteen years ago, the Hagerman WMA was designated as an Important Bird Area (IBA) by the Idaho Department of Fish and Game and the National Audubon Society. http://iba.audubon.org/iba/viewSiteProfile.do?siteId=558&navSite=state</p>	<p>The BLM recognizes the importance of the area. Impacts to waterfowl and other birds in Hagerman Valley are disclosed in Section 3.10 of the EIS and SEIS. Effects to listed species are also disclosed in the USFWS Biological Opinion.</p>
EA-12	5	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>In addition, the WMA is part of the Idaho Birding Trail system. http://fishandgame.idaho.gov/ifwis/ibt/site.aspx?id=SW36</p> <p>Thousands of waterfowl are injured and killed each year throughout the United States because of collisions with transmission lines. This is well documented. Even the energy industry's own literature states that these lines need to be sited</p>	<p>Bird collisions are addressed in Section 3.10 of the EIS and FSEIS.</p>

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				<p>away from waterfowl flyways such as the one found in the Hagerman Valley.</p> <p>The Hagerman Valley also is a prominent part of the popular “Thousand Springs Byway” which has 11 priority resource sites, five of which are located in in this valley. Another mega transmission line would be a detriment to important scenic and recreational values found here.</p>	
EA-12	6	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values.”(SEIS). BLM’s RMPs are documents written to uphold these protections for the public trust.</p>	All BLM decisions on this and other projects must be consistent with applicable laws, regulations, and land management plans, as amended.
EA-12	7	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>PFA believes the changes made to Bureau of Land Management (BLM) Field Offices’ Resource management Plan (RMP) amendments as stated in the SEIS in general and in particular, amendments to the Cassia RMP, Twin Falls Management Framework Plan (MFP), and the Jarbidge RMP are unwarranted, detrimental, and undermine the public trust.</p> <p>Importantly, instead of working within the confines set by the BLM F.O.s’ RMPs, for the protection of invaluable natural resources for the public good; Proponents seek to undermine it.</p>	PFA’s belief that amending plans undermines the public trust is noted. However, land management plans are meant to be flexible. The planning rules anticipate that conditions and public needs change over time. Therefore, the planning regulations provide for amending plans as conditions and public needs change. The SFEIS considered the direct, indirect, and cumulative impacts from the plan amendments.
EA-12	8	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>The SEIS states, “As with FEIS Proposed 9, the Segment 9 Revised Proposed Route would cross approximately 2.7 miles of the Salmon Falls Creek ACEC (Table 3.17-17).</p> <p>Note: Areas of Critical Environmental Concern (ACECs). These are areas the BLM identifies as part of the RMP in order to protect a variety of sensitive resources such as important habitat for imperiled wildlife, sensitive cultural resource areas such as archeological sites, rare geological features, or other unique attributes that deserve</p>	The EIS and SEIS acknowledge the importance of the ACEC. Effects due to permitting the line to cross the ACEC are disclosed in the SEIS. The BLM must balance completing public and environmental resource needs in managing public land.

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				some form of conservation and special management.	
EA-12	9	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	BLM Burley F.O. management arbitrarily decided, without public knowledge, input, or regard; to change the route, in segment 9, after the Draft EIS, and take the line along rim of and across the Salmon Falls Creek Canyon, including Lily Grade. This is an illegal move by the Burley FO management and the proponents of this project.	Revising routes between draft and final in response to information developed in preparing the Draft EIS, as well as in response to comments received on the draft, is a normal part of the NEPA process. The change in the route was disclosed to the public in the final SEIS. The BLM considered public comments on the FSEIS in the ROD. Changing a route between draft and final was not in any way illegal.
EA-12	10	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>The proponents were aware this area is designated as a Area of Critical Environmental Concern (ACEC) in both BLM's Jarbidge F.O. and Burley F.O.'s, Twin Fall District on both The sides of Salmon Falls Creek Canyon. The canyon is also designated as a ACEC as well as a Outstanding Natural Area(ONV), eligible Wilderness Study Area (WSR), and A Special Recreation Management Area (SRMA).</p> <p>There was a different publicly disclosed route, Alternative 9C, in the Draft EIS.</p> <p>The FEIS states, "No amendment for this area was proposed in the Draft EIS because it was thought that crossing the WSR at the proposed location would not be consistent with WSR management goals.", ..</p> <p>"An alternative crossing of the river (Alternative 9C) would avoid the eligible WSR and the ACEC (emphasis added)." ... "The Burley FO has stated that the WSR classification at this location is "Recreational" and that this crossing would not have a negative effect on the outstandingly remarkable values (ORVs) for that classification (emphasis added). Amendments for crossing the ACEC and VRM Class II lands are therefore provided in the Final EIS." FEIS F1-31</p> <p>At the time we couldn't find the above mentioned alternative 9c on the BLM's interactive project map, because the map doesn't show any of this part of the project. It was not included on the map in FEIS appendix F.1-34.</p>	<p>See the previous response. Also, note that a new Jarbidge Resource Management Plan was approved in 2015; this was a new plan, not an amendment to the existing plan as implied in the comment. The new plan includes a utility corridor in the area. The plan was revised through a public process as required under FLPMA. The fact that the plan was revised is disclosed in Chapter 1 of the FSEIS. The new plan is described in some detail in Appendix F of the FSEIS.</p> <p>The statement quoted—"Therefore, a transmission line crossing this portion of the eligible WSR segment would not affect the river's suitability as a Recreation River"—is correct. As explained in Appendix F of the SEIS, the route was revised to avoid crossing at a location that would affect the suitability of the river as either scenic or wild. A transmission line would not be consistent with those designations. However, a transmission line is permitted in a Recreation River. Note that this section of the river already includes a road, a bridge, and a 34.5-kV electric line (see Appendix F of the FSEIS).</p>

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				<p>Both Jarbidge RMP and Twin Falls MFP direction for Visual Resources gave explicit instructions on how the ACEC and Salmon Falls Creek Canyon should be managed.</p> <p>A amendment has already been made in the Jarbidge 2015 RMP changing a important designation of the ACEC along the west side Salmon Falls Creek Canyon allowing a 500-kV transmission line to cross Salmon Falls Canyon in anticipation of the east side Twin Falls F.O. RMP amendment to the illegal change of the FEIS route without public input that negated the NEPA process.</p> <p>Interested public was not given this information or the opportunity to comment. BLM and proponents of this project violated National Environment Policy Act (NEPA) when they knowingly introduced new and additional information in their final Environmental Impact Statement (FEIS) concerning where their transmission line will cross public land in the Burley BLM Field Office (F.O.) as described in our appeal. Gateway PFA Declaration Statement 12-21-2013, pgs: 1, 5, and 6. This information is still relevant as this appeal is still unresolved!</p> <p>In reading through the Special Management Areas section, the statement "Therefore, a transmission line crossing this portion of the eligible WSR segment would not affect the river's suitability as a Recreation River."</p> <p>The proponents through a amendment, want the BLM to reduce the important designation of the ACEC as well as WSR with ORVs. to a recreational designation. It's like redesignating a Classic Bentley luxury sedan, to a AMC Gemlin and then allowing it to be treated as such. Granted the ACEC has been beaten but it still retains it's unique OVR's and deserves to remain a ACEC. It's a classic and should be treated a such!</p> <p>The BLM has the discretion to disallow this amendment for the future enjoyment of wide open vistas in a natural setting not far from the City of</p>	

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				Twin Falls. This will be far more important in the future to the area.	
EA-12	11	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>PFA believes: proponents objectives “which include providing increased transmission capacity and a more reliable transmission line system for transport of energy, including wind energy, to meet existing and future needs” (FEIS) can be done within the confines of existing energy corridors to increase efficiency and reliability.</p> <p>”The Proponents originally designed the the 162.2 mile long route as the Proposed Route in Segment 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible.” (SEIS)</p> <p>There's still no reasonable explanation by proponents or BLM for the split line through Idaho. The huge cost and willingness to combat the controversy of the southern split, numbers 7,9, and 10, leads us to believe they have other plans, such as future development of proposed ill-sited wind farms: Cotteral Mountains, China Mountain, Simplot, and South Hills Important Bird Area,etc. Thereby further degrading sage-grouse and other wildlife's habitat</p> <p>“Other projects would continue, including other transmission line projects, wind farms. solar projects,.....The demand for electricity, especially for renewable energy would continue to grow in the Proponents' service territories.” This is a clue as to the who the customers would be in the project areas.(SEIS)</p>	The reason for the two lines following separate paths is explained in detail in the original EIS, which the SEIS supplements. One of the Proponents’ objectives is to improve the reliability of the grid by building transmission lines in widely separated areas, thus reducing the chance that a single event, such as a wildfire, could destroy both lines.
EA-12	12	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>PFA believes the reasoning behind the need for the amendments is very clear. BLM and Project Proponents believe energy companies takes precedent over anything that stands in the way of this project's construction across public land. Public land apparently has been set aside not for quality and sustainable use for future generations as stated in FLPMA (P.L. 94-579, Section 102(a)). An example of this is the changes already made to the Jarbidge RMP concerning the Salmon Falls Creek ACEC</p>	Comment noted. The BLM must balance completing public and environmental resource needs in managing public land.

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EA-12	13	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>“The EIS identifies opportunities to mitigate the impacts of siting and building Segments 8 and 9, if a ROW is granted, by incorporating avoidance, minimization, and compensation measures with consideration of local and regional conditions” Mitigation as portrayed will take care of most of the impact issues throughout the project, in reality when compared to the substantial negative impacts, the proponents mitigation strategys are not site specific and woefully small, inadequate, and apparently still in the development stage. When reading through the SEIS and FEIS we couldn't find where the above statement is true. There's no “avoidance, minimization, or compensation measures” for the important and unique areas such as the Salmon Falls Creek ACEC. If the statement above were true, there would be no need the change the RMPs. The only possible avoidance is to more convenient area to disturb such as the SRBOP, Golden Eagle Audubon stated, “Our simple conclusion was that a route through the Birds of Prey Area presents the lesser of two evils.” http://www.goldeneagleaudubon.org/Gateway-West-Transmission-Line</p> <p>“The MEP does not provide sufficient details or specifics for development of such mitigation actions related to habitat restoration. The lack of detail or specifics in the MEP makes it unclear how the MEP goals would be achieved.” (SEIS). Clearly there's a need for site specific data and analysis for this project.</p> <p>Under “Habitat Restoration we find, “ The goal for the Proponents’ habitat restoration proposal is to convert “non-native grasslands to native perennial plant communities” as well as to conduct “noxious weed control. Proposed funding to restore habitats within the SRBOP would have no effect on agricultural resources. Habitat restoration could occur in areas currently used as rangeland and pasture, but this potential reduction in rangeland and pasture would likely only affect a very small share of this type of land</p>	<p>Appendix M of the FSEIS includes nearly 50 pages of environmental protection measures. These are referenced throughout the FSEIS. Individual measures are evaluated in Chapter 3 of the EIS and the SEIS. In addition, see Appendix K, the BLM’s mitigation framework. As noted in the FSEIS, the BLM did not adopt the Proponents’ mitigation plan. The reasons why the BLM found the Proponents’ mitigation plan to be inadequate are described in the applicable sections of Chapter 3 of the SEIS.</p>

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				in the Analysis Area.”(emphasis added) (SEIS). In other words there will be little to nothing done to curb destructive land uses such as heavy grazing throughout the year.	
EA-12	14	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	The problems found in the SRBOP are due to very poor and shortsighted management by federal and state agencies that have allowed the spread of invasive weeds and grassed throughout the area without little to no protection of the native sage-steppe vegetation or it's wildlife, even allowing indiscriminate shooting of prey species throughout the area.	Comment noted.
EA-12	15	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>If BLM persists in allowing grazing to continue at it's present stocking rate and there's no changes as to when these areas slated for mitigation are grazed, e.g. destructive spring grazing; grazing new seedings, after only two growing seasons etc, based on 30 yrs. experience, we believe any mitigation will be short-lived and a waste of time and money.</p> <p>There's ways to truly mitigate these issues, but apparently the agencies lack the backbone to make the hard decisions it would take to make mitigate work in the long term. As natural undisturbed areas of public land become scarce, true mitigation becomes nearly impossible. How can the proponents mitigate visual values? They can't, they ask BLM to revise (downgrade) the RMP plans to fit their project.</p>	Comment noted. The decision to allow grazing following construction would be based on site-specific conditions.
EA-12	16	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Proponents consistently acknowledge their added adverse effects throughout the SEIS; direct, indirect, and cumulative impacts throughout the project area during all phases of the project yet at the same time they state the opposite. Below are just a few excerpts as examples:</p> <ul style="list-style-type: none"> • “surface disturbance from the Project within just a half a mile from occupied sensitive plant habitats”. • “Visual resource or scenic specifications for allowable levels of visual contrast would have to be altered” That is to say, blight visual 	The EIS and SEIS were prepared by the BLM not the proponents. The statement quoted (“Gateway West would not have measurable adverse effects on natural resources within the project area.”) is taken out of context. The EIS and SEIS disclose the adverse impacts of the project using the measures described in the EIS for each resource. Effects on scenery are disclosed in Section 3.2 of the SEIS and in greater detail in Appendix G. Also see Appendix E. Effects on migratory birds are disclosed in Section 3.10 and Appendix D.

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				<p>resources across unique western landscapes along it's routes for the foreseeable future.</p> <ul style="list-style-type: none"> “important migratory bird habitats and ecological conditions through vegetation removal, fragmentation of native habitats, and possible increased in predation pressure by predators.” To be adversely and permanently affected. <p>“Gateway West would not have measurable adverse effects on natural resources within the project area.”</p>	
EA-12	17	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Though the SEIS acknowledges the ongoing threats within their project area such as livestock overgrazing and invasive grasses and weeds, etc. They state that these threats would continue with or without their transmission line. In this they are correct, but the added effects of a mega transmission line do substantially add to these threats as mentioned above, especially when coupled with the destructive RMP amendments and the challenges they represent for future management.</p>	<p>The analysis in Chapter 4 of both the EIS and SEIS discloses the cumulative effects associated with the transmission line and other past, present, and foreseeable future activities.</p>
EA-12	18	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>Again, instead of working within the confines set by the BLM FO.s' RMPs, for the protection of invaluable natural resources for the public trust, proponents seek to undermine it.</p> <p>Thus, many of the impacts throughout the project area can't be mitigated beyond a short time, especially for sagebrush-steppe obligations such as sage-grouse and pygmy rabbits, As undeveloped areas of public land are becoming scarce, true mitigation becomes nearly impossible. Also how can visual values be mitigated? Only be siting the project elsewhere.</p>	<p>Comment noted; please see the response above to your similar comment on amending plans.</p>
EA-12	19	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>We find in the SEIS the same types of general data and analysis found FEIS. It needs to be site-specific and detailed, “The NEPA analysis for Gateway, though a very thick stack of paper, does not provide the necessary site-specific details to fulfill NEPA’s hard look requirements at direct, indirect and cumulative impacts and mitigation actions. The still uncompleted surveys,</p>	<p>Both documents include detailed assessments of the existing condition and environmental effects. For example, see the detailed tables for vegetation and wildlife in Appendix D.</p>

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				reports and plans constitute avoidance, minimization and mitigation measures – ranging from cultural and historical resources to controlling project destruction and impairment actions that will seriously impact wildlife and sensitive species habitats and populations. These species include sage-grouse, pygmy rabbit, and migratory birds.” Appellants Response to Stoel Rives LLP, Council to Pacificorp and Idaho Powers’ (Respondent-Intervenors); Answer to Statement of Reasons, IBLA Docket No. 2014-55,WYW- 174598; IDI-35849. Dated: May 5, 2014	
EA-12	20	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	We found the SEIS to be confusing and difficult to navigate through.	Comment noted. The Project is not simple, crossing many different jurisdictions and habitats; therefore, the analysis is not simple either.
EA-12	21	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	We ask that the illegal section through the Salmon Falls Creek ACEC to Lily Grade be dropped as the proponents already had 9c set out for public comment. That is what was offered through NEPA and what the public was commenting on.	As explained above (as well as in the FSEIS), there is nothing illegal involved in the Lilly Grade crossing.
EA-12	22	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	As the SEIS is written, proposed project would substantially increase negative impacts, the proposed amendments would significantly downgrade protections to important and unique natural resources such as visual, wildlife, and special designated areas put in place for future generations. Again, FLPMA (P.L. 94-579, Section 102(a)) states that it is the policy of the United States that: (8) “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values.”(SEIS). BLM's RMPs are documents written to uphold these protections for the public trust	The EIS and SEIS acknowledge that the Project would have substantial effects, which is why an EIS was prepared. It provides the public and the decision official the information needed to balance competing resources. The BLM must balance the need to protect habitat with other requirements, such as the need to upgrade the electrical grid.
EA-13	1	9-27-17	Idaho Conservation League – John Robison	We understand that the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act of 2017 directed the BLM to issue a ROW grant for portions of	Alternative 1 follows existing transmission lines where feasible. However, following existing transmission lines or utility corridors is not without serious impacts. The analysis in the EIS and SEIS considered these impacts.

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				<p>Gateway West Segments 8 and 9 consistent with Alternative 1 of the Final Supplemental EIS. We also understand that additional NEPA analysis is needed for the public lands affected by this decision that lay beyond the NCA boundaries. We believe that this EA is an important opportunity to address several issues not fully addressed in the legislation. We are particularly concerned about construction of transmission facilities within or adjacent to habitat for sage-grouse. We urge the BLM to site the ROW in previously developed areas or along existing corridors to avoid impacts to sage-grouse to the maximum extent practicable. Where there still may be impacts to sage-grouse, these impacts should be avoided through design features and mitigated by utilizing Idaho's mitigation framework for sage-grouse.</p>	<p>The Project includes an extensive analysis of sage-grouse habitat and Project effects on sage-grouse, See Section 3.11 and the Habitat Equivalency Analysis (HEA) in Appendix J of the 2013 FEIS.</p>
EA-13	2	9-27-17	Idaho Conservation League – John Robison	<p>Sage-grouse - Conservation Status As stated in our previous comments, there is significant concern regarding the long-term viability of greater sage-grouse populations. Greater sage-grouse suffer from the loss, degradation, and fragmentation of habitat throughout the west. It is estimated that only 50-60% of the original sagebrush steppe habitat remains in the west (West 2000), and in 2007, the American Bird Conservancy listed sagebrush as the most threatened bird habitat in the continental United States.</p>	<p>Comment noted.</p>
EA-13	3	9-27-17	Idaho Conservation League – John Robison	<p>Impacts of transmission lines on sage-grouse One of the top threats to sage-grouse is infrastructure projects: Disturbance to important seasonal habitats: Human activity and noise associated with machinery or heavy equipment in proximity to occupied leks or other important seasonal habitats may disturb sage-grouse. -Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-125 Depending on location and design specifics, the construction of transmission lines within sage-</p>	<p>Comment noted. These factors are addressed in the Section 3.11 of the SEIS. The comment includes many lines that are direct quotes from our analysis. The HEA addresses Project-effects on sage-grouse and proposes mitigation for direct and quantifiable indirect effects. See Appendix J of the 2013 FEIS.</p>

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				grouse habitat constitutes “nonlinear infrastructure” under the Conservation Plan for the Greater Sage-grouse in Idaho (Idaho Sage-Grouse Advisory Committee 2006). Nonlinear infrastructure is defined as “human-made features on the landscape that provide or facilitate transportation, energy, and communications activities...including wind energy facilities.” The Conservation Plan lists infrastructure such as this as the second greatest threat for sage grouse, with wildfires as the greatest risk. Road construction and use associated with transmission line maintenance represents high risk for loss of lek areas, nesting locations, and brood-rearing habitats (Braun 1986, Connelly et al. 2004). , In addition, sage-grouse have been shown to avoid transmission lines, presumably because of potential predation. Ellis (1985) found a 72% decline in the average of males on leks and a 65% increase in predation efforts involving raptors following the construction of a transmission line within 200 m of an active sage-grouse lek in northeastern Utah. Sage-grouse lek attendance dropped significantly following power line construction within 3 miles of leks in California. In a comprehensive study of ecological requirements, sage-grouse were extirpated in areas where power line densities were above 0.20 km/km2 and sage-grouse habitat was ranked highest where powerlines were less than 0.06 km/km2.	
EA-13	4	9-27-17	Idaho Conservation League – John Robison	Furthermore, the Governor of Idaho submitted the State of Idaho’s Alternative for incorporation into the National Greater Sage-Grouse Planning Strategy. This alternative describes additional restoration efforts and additional regulatory mechanisms to stabilize and restore sage-grouse populations, protect sage-grouse habitat and to preclude the need to list sage-grouse. The Idaho Conservation League served as a member of the Governor’s Sage-grouse Task Force which drafted this plan. A key component of this plan is to avoid placing large-scale infrastructure projects	Comment noted. The SEIS addresses the State’s sage-grouse plan in Section 3.11.

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				such as 500kV transmission lines within core and important sage-grouse habitat as defined by the plan due to the negative effects that transmission lines have on sage-grouse.	
EA-13	5	9-27-17	Idaho Conservation League – John Robison	<p>Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the different habitats throughout the year. Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below:</p> <ol style="list-style-type: none"> 1) Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush. 2) Movement to winter habitat. 3) Occupation of winter habitat from November through February. The primary requirement of winter habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges. 4) Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009). 5) Female movement to nesting sites and nesting between March and June. Nesting females 	Comment noted. These factors were considered in the analysis. See Section 3.11 of the SEIS and the HEA.

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				<p>commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007)</p> <p>6) Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks.</p>	
EA-13	6	9-27-17	Idaho Conservation League – John Robison	<p>Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, particular care needs to be taken to avoid disturbance near lekking areas, disturbance and loss of sagebrush and native forbs used for early brood-rearing, and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing. Avoiding human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment. Based on the habitat guidelines for sage-grouse management presented in Connelly et al. (2000), and others, we recommend siting the transmission line far enough from leks and other sage-grouse habitat to avoid negative effects. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and brood-rearing habitats.</p>	Comment noted.

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EA-13	7	9-27-17	Idaho Conservation League – John Robison	<p>Minimizing impacts</p> <p>Once routes with major impacts have been avoided, the BLM should require design features to ensure that any side effects or minor impacts are minimized through design features. With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation:</p> <p><i>Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure.</i></p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p>	Comment noted.
EA-13	8	9-27-17	Idaho Conservation League – John Robison	<p>When considering design features to minimize adverse effect to sage-grouse, the BLM needs to consider both the appropriate spatial scale for considering effects of proposed management activities on sage-grouse and their habitat as well as the adverse impacts of invasive exotic plant species, and the increased threat of wildfire.</p> <p>Knick and Hansen (2009) analyzed factors in lek persistence of over 5,000 leks. They used three radii to test for landscape disturbance effects on lek persistence – radii of 3.1 miles, 11.2 miles, and 33.5 miles. Previous studies had shown behavioral effects on sage-grouse related to sagebrush disturbance at the 33.5 mile radius (Swenson et al. 1987, Leonard et al. 2000).</p> <p>Knick and Hansen’s study showed adverse effects on lek persistence from wildfire at the 33.5-mile radius. As such, the design features to minimize impacts should be based on both the quality of the habitat adjacent to the transmission line, the topography of that habitat, the impacts to that habitat and to sage-grouse, and the specific use of that habitat by sage-grouse (lekking, nesting and brood rearing, etc).</p>	Comment noted. Please see the extensive list of required design features (termed Environmental Protection Measures) in Appendix M of the SEIS.
EA-13	9	9-27-17	Idaho Conservation	Mitigation	Comment noted. The HEA addresses Project-effects on sage-grouse and proposes mitigation for direct and

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			League – John Robison	<p>Where impacts have already been avoided and minimized, the Conservation Plan also recommends developing off-site mitigation for any remaining impacts:</p> <p>Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>A key component of the Governor’s Sage-Grouse Conservation Plan is the use of a Mitigation Framework developed by the State Sage-Grouse Advisory Committee. This framework is based on the assumption that impacts will be first avoided, then minimized and finally mitigated.</p> <p>The mitigation framework requires the quantification of both direct and indirect impacts. The USFWS’s determined that transmission lines may cause a host of adverse indirect effects to sage-grouse, including increased predation, lower recruitment rates, habitat fragmentation, habitat degradation from invasive species, and impacts from electromagnetic fields. However, the Habitat Equivalency Analysis focused only on direct impacts when calculating the degree of mitigation needed. The BLM should utilize the phased decision approach to expand the analysis to include indirect effects when making mitigation calculations.</p>	quantifiable indirect effects. See Appendix J of the 2013 FEIS. In addition, the BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
EA-13	10	9-27-17	Idaho Conservation League – John Robison	<p>The BLM should start by considering the indirect effects within a standard, conservative distance from the transmission line and adjust this distance depending on the quality of the habitat adjacent to the transmission line, the topography of that habitat, the impacts to that habitat and to sage-grouse, and the specific use of that habitat by sage-grouse (lekking, nesting and brood rearing, etc). The mitigation calculations need to factor in the success rate of vegetation</p>	Comment noted. See the above response.

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				<p>restoration efforts, the rate of habitat loss due to wildfire, the lag time before any actual mitigation is realized. In our determination, fence marking/modification, as described in the Habitat Equivalency Analysis, is not an appropriate form of mitigation for indirect effects related to this project.</p> <p>The BLM should base its mitigation program on the recently released Regional Mitigation Manual (see Instruction Memorandum No. 2013-142). The BLM has full authority to require mitigation for indirect effects to sage-grouse. Failure to do so would represent a notable lack of the regulatory mechanism needed to prevent the listing of this species.</p>	
EA-13	11	9-27-17	Idaho Conservation League – John Robison	<p>Depending on the nature and degree of these impacts, an offsite mitigation program could be available to direct funding from the project proponent to high-priority restoration areas. The Governor’s Plan calls for restoration within Core Habitat Areas where the habitat has been degraded but can be restored. This mitigation program should not be available for projects within Core Habitat Zones where infrastructure should not be located (allowing for limited exceptions).</p>	Comment noted.
EA-13	12	9-27-17	Idaho Conservation League – John Robison	<p>Other species Portions of the project area may also contain habitat that is crucial to sagebrush steppe obligate species such as sage-grouse, pygmy rabbits, sage thrasher, sage sparrow, and others. Such habitat has been severely fragmented and reduced through a variety of land management practices, including road construction and development of rights of way corridors. Big game may also be adversely affected by project development. As with sage-grouse, the BLM should minimize negative impacts by avoiding areas of critical habitat for species of concern, establishing siting criteria to minimize soil disturbance and erosion on steep slopes, utilizing visual resource management guidelines, avoiding</p>	Comment noted. Greater sage-grouse is an obligate sagebrush species. By mitigating effects to sage-grouse habitat the HEA mitigates effects on habitat for other sagebrush obligate species.

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				significant historic and cultural resource sites, and mitigating conflicts with other uses of the public lands.	
EA-13	13	9-27-17	Idaho Conservation League – John Robison	Roads and Right of Way Corridors Previous management activities have resulted in extensive road and right-of-way densities throughout our public lands. This density compromises the ability to support wildlife and fish by promoting further human disturbance, fragmenting habitat, accelerating sedimentation, spreading noxious weeds, and encouraging illegal Off Road Vehicle use. Furthermore, there is a positive correlation between roads, even temporary ones, and human-caused wildfire ignitions. We recommend that the BLM evaluate the road and transmission network to avoid impacts to important wildlife habitat where feasible, and close or decommission unneeded roads and corridors as part of the overall mitigation program.	Comment noted.
EA-13	14	9-27-17	Idaho Conservation League – John Robison	Off Road Vehicle Use The devastating impacts of improper Off Highway Vehicles (OHVs) on terrestrial and aquatic ecosystems are well established. Improper OHV use degrades water quality, spreads noxious weeds, fragments habitat, disturbs wildlife, increases fires, and displaces non-motorized recreationists. The BLM needs to take additional steps to manage and monitor OHV use along transmission corridors.	Off-road vehicle use is addressed in Section 3.17 of the SEIS.
EA-13	15	9-27-17	Idaho Conservation League – John Robison	Noxious Weeds The most cost-effective way to deal with noxious weeds is to protect strongholds of native vegetation from activities which either spread noxious weeds directly or create suitable habitat by removing native vegetation and disturbing the soil. BLM activities should limit road use and the exposure of mineral soils where weeds may become established. Roads, trails, and rivers serve as the primary routes for noxious weed species expansion. Special care should be taken	Noxious weeds and invasive plants are addressed in Section 3.8 of the SEIS. Also see the environmental protection measures in Appendix M.

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				to safeguard ecologically intact areas that are not currently infested.	
EA-13	16	9-27-17	Idaho Conservation League – John Robison	Coordinate, Minimize, and Mitigate Impacts to Sage-grouse and other resources As stated in our previous comments, we believe that an integral part of conserving and recovering sage-grouse and other native species will be relying on guidance from local and national stakeholder groups. As such, we recommend that the BLM consult with national, state and regional conservation organizations that have expressed interest in this project. In addition, we recommend that the BLM coordinate with the US Fish and Wildlife Service, local Sage-grouse Working Groups, the Idaho Department of Fish and Game, and the Governor's Office of Species Conservation, and, of course, the project proponents.	The BLM has consulted (and will continue to consult) the State, the USFWS, and other sage-grouse experts.
EA-13	17	9-27-17	Idaho Conservation League – John Robison	Additional comments on predation We are concerned that if a transmission line is constructed in sage-grouse habitat, increased numbers of raptors and corvids will adversely impact sage-grouse productivity. Sage-grouse have relatively low reproductive rates and populations can be affected by artificially increased predator numbers.	The EIS and SEIS address predation in Sections 3.10 and 3.11.
EA-13	18	9-27-17	Idaho Conservation League – John Robison	Mitigation for other impacts The BLM needs to examine the mitigation requirements for other affected resources. Mitigation measures should be in place for as long as the impacts persist. Mitigation measures may include habitat restoration, obliteration of user-created and redundant roads and trails, and removal of unneeded range management improvements, removal of trash, increased outreach, education and enforcement efforts.	The BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
EA-13	19	9-27-17	Idaho Conservation League – John Robison	RMP Protest On May 28, 2013, the Idaho Conservation League submitted a protest regarding specific RMP amendments. The concerns expressed in this protest also apply to the FEIS and we reiterate them here.	Comment noted. Please refer to the Department's response to these protests.

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				Name of Resource Management Plan Amendments being protested: Pocatello RMP Cassia RMP Twin Falls RMP Jarbidge RMP Morley Nelson Snake River Birds of Prey RMP Bruneau RMP Kuna MFP Caribou-Targhee National Forest Sawtooth National Forest	
EA-13	20	9-27-17	Idaho Conservation League – John Robison	Pocatello RMP The current Pocatello RMP prohibits new transmission towers within 2 miles of occupied sage-grouse leks and an amendment is proposed that would waive this stipulation. Although the route through the Pocatello Resource Management Area attempts to minimize impacts by collocating the line with a preexisting project, these impacts still cannot fully be avoided. The BLM needs to craft the amendment such that any impacts to sage-grouse are also minimized through additional design features such as limits on the season and timing of construction activities and by developing a mitigation program to calculate and offset the impacts. The mitigation program needs to factor in high priority areas for restoration and conservation, the proper ratio of habitat improvements, the probability of success for restoration efforts, and the lag time before these habitat improvements are realized. We note that the Pocatello RMP is supposed to manage sage-grouse habitat consistent with the Conservation Plan for Greater Sage-grouse in Idaho. The Conservation Plan specifically recommends developing off-site mitigation for unavoidable impacts: Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should	Decisions on routes through the Pocatello area were decided in the 2013 ROD and are not open for consideration in this EA.

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				<p>be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>Additional resources to be mitigated include other wildlife, winter range, bald eagle nests, sensitive areas and visual resources.</p>	
EA-13	21	9-27-17	Idaho Conservation League – John Robison	<p>Cassia RMP Amendments FEIS F.1-28</p> <p>We oppose the amendment because the scenic values in the Goose Creek Travel Zone are not being adequately protected or offset. While it is difficult to mitigate for impaired visual resources, the BLM should consider expanding and strengthening protections for other areas within the Cassia area so that other incursions will not be allowed.</p> <p>In addition, segments of the route through the BLM Burley Field Office are in an Important Bird Area for sage-grouse and the mitigation measures for such incursions are not adequately described.</p>	Decisions on routes through the Cassia area were decided in the 2013 ROD and are not open for consideration in this EA.
EA-13	22	9-27-17	Idaho Conservation League – John Robison	<p>Twin Falls MFP Amendments FEIS F. 1-31</p> <p>Jarbidge RMP FEIS F.1-37</p> <p>We oppose the Twin Falls MFP Amendments FEIS F.1-31 and the Jarbidge RMP, FEIS F.1-37 because of impacts to several sensitive environmental areas are not adequately avoided, minimized or mitigated. Specifically, the amendments would allow impacts to Salmon Falls Creek Canyon Area of Critical Environmental Concern (ACEC), eligible Wild and Scenic River, Outstanding Natural Area (ONA), Special Recreation Management Area (SRMA) and VRM direction without properly offsetting these impacts. Any amendments to these areas need additional strengthening to ensure that protections for these values will increase so there is no net loss in terms of protections. Options to consider include expanding these natural areas, increasing the level of protections within these natural areas and developing additional design features to minimize and mitigate for impacts.</p>	Comment noted. Resource issues are addressed in EA sections 3.2.3 Cultural Resources, 3.2.13 Paleontological Resources, and 3.2.14 Geologic Hazards.

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				We are also concerned about impacts to paleontological resources (Sugar Bowl, Glens Ferry and McGinnis Ranch) and Oregon Trail ruts by amending the RMP to allow the transmission line to be constructed in prohibited areas. F.1-43. If any amendment is considered here, the BLM needs to build additional sideboards so that the special geologic and historic resources of these area are awarded high protections from future incursions or that the BLM receive additional resources for research and interpretation.	
EA-13	23	9-27-17	Idaho Conservation League – John Robison	Snake River Birds of Prey National Conservation Area We are concerned about the amendments regarding the addition of new utility corridors, incursions into the few remaining non-motorized areas, the adverse impacts to visual resources such as Sinker Creek Canyon and negative effects to special status species such as slickspot peppergrass, and signature species such as prairie falcons, golden eagles and other raptors. SRBOP F.1-51. We are particularly concerned about allowing motorized intrusions into the Halverson Bar and Cover non-motorized areas. These amendments should either be struck or significantly modified to address these concerns. In addition, the BLM needs to ensure that the Gateway West Transmission line is actually compatible with the NCA and that the project will ultimately enhance raptor habitat. While we appreciate the concept of ratios of up to 5:1 for restoration of shrub and grasslands, the BLM needs to further develop this proposal to avoid, minimize and mitigate impacts. Any mitigation ratio needs to factor in the success rate of vegetation restoration efforts, the rate of habitat loss due to wildfire, the lag time before any actual mitigation is realized. The actual ratios may be much greater. Additional mitigation measures such as inventorying cultural resources, hiring additional law enforcement and enhancing scientific and education efforts need to be further developed before any amendments are	The routes being considered in this EA are no longer on land in the SRBOP NCA; therefore, the EA will not include amendments to the SRBOP RMP.

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				considered. As a form of partial mitigation, the BLM should examine the feasibility of permanently expanding the NCA in key areas by acquiring private property from willing sellers. We are also concerned that the southern routes will have substantive negative effects on sage-grouse and that developing these routes may not be feasible with sage-grouse protections.	
EA-13	24	9-27-17	Idaho Conservation League – John Robison	Snake River Special Resource Management Area Amendments are also being considered that would affect the Snake River Special Resource Management Area that would simply reduce the SRMA designation by 6,400 acres. F.1-56. The BLM somehow states that recreational goals for the Oregon National Historic Trail and C.J. Strike SRMAs would not be impacted because these lands would have been removed from designation, but certainly the amount of land emphasized for recreation and the quality of that recreation would be affected.	See the preceding response.
EA-13	25	9-27-17	Idaho Conservation League – John Robison	Bruneau RMP We are concerned about the cumulative effects of the lowering the visual standards for the Bruneau RMP because additional infrastructure elements could be considered and would have an improved ability to be permitted. F.1-65.	Comment noted.
EA-13	26	9-27-17	Idaho Conservation League – John Robison	Kuna MFP Allowing amendments to the Kuna MFP could adversely impact wildlife, vegetation, soils and cultural resources. F.1-71. We are particularly concerned about impacts to water quality, fisheries, elk winter range, and raptors. We believe that this amendment should be rewritten to ensure that these other resources are properly protected and not impaired.	Comment noted.
EA-13	27	9-27-17	Idaho Conservation League – John Robison	Caribou-Targhee National Forest The proposed Forest Plan amendments regarding snag protections for cavity nesters needs to be offset by increasing protections for cavity nesters in other areas. One possibility would be expanding the areas off-limits to firewood collectors where such trees are at risk.	Decisions on routes through the Caribou-Targhee NF were decided in the 2013 USDA Forest Service ROD.

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				F.2-13. Similarly, the amendment affecting goshawks, snags, visuals, Aquatic Influence Zones, woodpeckers, semi-primitive recreational should contain additional mitigation measures. F.2-14-18.	
EA-13	28	9-27-17	Idaho Conservation League – John Robison	Sawtooth National Forest The amendments for visual resources should also be balance with increased protections for other areas on the Forest. F.2-28	Decisions on routes through the Sawtooth NF were decided in the 2013 ROD. No routes through the Sawtooth Forest were approved. This EA is not considering any routes through national forest system lands.
EA-13	29	9-27-17	Idaho Conservation League – John Robison	NEPA analysis These amendments have not yet gone through the full NEPA process. The analysis of the effects of these amendments is tiered to the Gateway West Final Environmental Impact Statement which is open for public comment until June 28, 2013. The BLM is still accepting public comments, responding to comments, refining alternatives and no final Record of Decision has been issued. It is very helpful when assessing such projects to incorporate RMP amendments into the EIS process so the actual impacts are fully analyzed and disclosed. Closing the protest period on the RMP amendments before the completion of the full analysis is an inappropriate segmentation of NEPA. We are particularly concerned because several of these amendments were not proposed in the original DEIS so the public has not had an adequate opportunity to review them.	Comment noted. See the above responses. Any amendments proposed in this EA will be subject to a 30-day protest period, as required by BLM regulations.
EA-13	30	9-27-17	Idaho Conservation League – John Robison	Cumulative effects The BLM amendments underestimate the likelihood of additional infrastructure projects utilizing the same ROW, leading to increasing impacts to other resources. The BLM needs to adopt additional protections for these remaining resources to ensure that they are properly managed and maintained.	Comment noted. Please refer to Appendixes F and G in the SEIS for the analysis of direct and indirect effects and Chapter 4 for cumulative effects.
EA-13	31	9-27-17	Idaho Conservation League – John Robison	Sage-grouse We are particularly concerned about impacts to sage-grouse and ask that the BLM craft any amendments to avoid, minimize and mitigate	Please see the response to your detailed comments on these issues above. Mitigation for sage-grouse is based on the science-based HEA completed for this Project by

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				<p>impacts. Sage-grouse were recently determined to warrant full protections under the Endangered Species Act but were precluded by higher priorities. Infrastructure projects represent one of the top threats to sage-grouse:</p> <p>Disturbance to important seasonal habitats: Human activity and noise associated with machinery or heavy equipment in proximity to occupied leks or other important seasonal habitats may disturb sage-grouse.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-125</p> <p>The Conservation Plan also recommends developing off-site mitigation for unavoidable impacts:</p> <p>Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation:</p> <p>Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>The BLM should consult closely with the Idaho Department of Fish and Game and the Local Sage-grouse Working Group to determine appropriate measures to avoid, minimize and mitigate impacts.</p> <p>The BLM, when considering mitigation requirements for adverse sage-grouse effects,</p>	<p>an interagency taskforce. See Appendix J of the 2013 FEIS. See Appendix J of the 2013 FEIS.</p>

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				needs to consider both the appropriate spatial scale for considering effects of proposed management activities on sage-grouse and their habitat as well as the adverse impacts of invasive exotic plant species, and the increased threat of wildfire.	
EA-13	32	9-27-17	Idaho Conservation League – John Robison	<p>Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the different habitats throughout the year. Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below:</p> <ol style="list-style-type: none"> 1) Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush. 2) Movement to winter habitat. 3) Occupation of winter habitat from November through February. The primary requirement of winter habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges. 4) Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009). 	Comment noted. In addition to the analysis in Section 3.11 of the SEIS, please see the detailed analysis in the HEA, which recognizes that the birds move through large areas as part of their lifecycle and proposes mitigation to compensate.

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				<p>5) Female movement to nesting sites and nesting between March and June. Nesting females commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007)</p> <p>6) Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks.</p> <p>Knick and Hansen (2009) analyzed factors in lek persistence of over 5,000 leks. They used three radii to test for landscape disturbance effects on lek persistence – radii of 3.1 miles, 11.2 miles, and 33.5 miles. Previous studies had shown behavioral effects on sage-grouse related to sagebrush disturbance at the 33.5 mile radius (Swenson et al. 1987, Leonard et al. 2000). Knick and Hansen’s study showed adverse effects on lek persistence from wildfire at the 33.5 mile radius.</p> <p>Avoiding and minimizing human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and brood-rearing habitats.</p>	

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EA-13	33	9-27-17		Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, additional mitigation efforts will be needed for disturbance to sagebrush near lekking areas; disturbance and loss of sagebrush and native forbs used for early brood-rearing; and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing. A conservative estimate for the nesting and brood rearing area affected will include buffers with radii of 6.2 miles around known leks. Mitigation specifics could be based on a mitigation template recently created for the Lesser Prairie Chicken, a ground-nesting species facing similar threats (Horton et al. 2010).	Comment noted. Mitigation for sage-grouse is based on an extensive, science-based analysis of habitat, existing disturbances, and project impacts, the HEA, see Appendix J of the 2013 FEIS. The HEA addresses Project-effects on sage-grouse and proposes mitigation for direct and quantifiable indirect effects. In addition, the BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
EA-13	34	9-27-17		Regarding adverse impacts from invasive exotic species, including increased wildfire risk, the BLM needs to address concerns about cheatgrass establishment and spread. Once cheatgrass becomes established in a sagebrush community, its effects cascade in synergistic feedbacks toward increasing dominance resulting from increased fire disturbance, loss of perennial species and their seed banks, and decreased stability and resilience to changes in the surrounding landscape (Miller 2009). Effective cheatgrass prevention after disturbance is most likely with the establishment of a healthy native vegetation community. The BLM needs to identify the baseline vegetation conditions and the desired post-reclamation plant community, and require post-project monitoring of the reclaimed areas and repeated revegetation treatments as necessary until the desired vegetation is established. The footprint for areas to be revegetated and monitored should include a 5m buffer around linear disturbances such as roads. Suggested monitoring protocols could include Interpreting Indicators of Rangeland Health (IIRH, Duniway 2010).	Comment noted. The SEIS in Section 3.11 discusses cheatgrass and other noxious weeds. Appendix M includes measures to avoid spreading noxious weeds.

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EA-14	1	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Scoping Process</p> <p>To a certain extent, WWP and the public are writing scoping comments in the dark. The Consolidated Appropriations Act, 2017 (H.R. 244), which incorporated the Morley Nelson Snake River Birds of Prey NCA Boundary Modification Act (Modification Act) by reference (Division G, Title IV, Sec. 431(a), required the BLM to issue a Right of Way (ROW) grant. The Modification Act directed the BLM to issue a ROW grant for the lands described in Sec. (b)(2) of the Modification Act for portions of Gateway West Segments 8 and 9. However, the BLM has not shared that ROW and its map with the public. In fact, when WWP asked the BLM to provide them, most especially a map, the BLM stated that we would have to FOIA for them. WWP has done so, but FOIA's 20 working day deadline for a final determination will end after this scoping period has ended. As a result, WWP anticipates that we may have additional scoping comments to provide once we receive the ROW and its map from the BLM. Depending on when the BLM fills our FOIA request, it may be after the end of the formal scoping period.</p>	Comment noted.
EA-14	2	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Impacts to Sensitive & Listed Species -- Fire & Weeds</p> <p>According to the Final Supplemental Environmental Assessment for Segments 8 and 9 (FSEIS), the Project will negatively impact habitat for greater sage-grouse, Slickspot peppergrass, and other sensitive species. Likely impacts include: "fragmentation of vegetation communities, increased potential for introduction and spread of invasive plant species," and "alteration of fire regime."</p> <p>USFWS has found that habitat fragmentation, invasive plants, and altered fire cycles threaten both sage-grouse and Slickspot peppergrass. See 81 FR 55084, 55058 (Slickspot peppergrass); 75 FR 13910, 13924 (sage-grouse). In addition, genetic isolation is a potential issue for Slickspot peppergrass, as</p>	The SEIS has analyzed the impacts to sage-grouse in Section 3.11 and in the extensive, science-based HEA, see Appendix J of the 2013 FEIS. Slickspot peppergrass is addressed in Section 3.8 of the SEIS. Also see the USFWS Biological Opinion/Conference Opinion including supplemental memoranda on slickspot peppergrass.

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				<p>several populations are already isolated due to habitat destruction. See 81 FR 55084, 55058. BLM must therefore fully analyze the potential for this Project to negatively impact these sensitive species. The agency must also take into account the cumulative effects of other projects, as well as natural occurrences such as wildfire. As the Final Supplemental EIS states, “there have been multiple large fires in the vicinity of the project.” Not only must BLM consider the cumulative impacts of the Project in light of these fires, but it must also take into account any current and future fire rehabilitation and vegetation treatment projects occurring in the vicinity of the Project route.</p>	
EA-14	3	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Consultation BLM must reinitiate consultation with USFWS regarding impacts to listed species if the project is “modified in a manner or to an extent not previously considered in the BO.” 50 C.F.R. § 402.16. USFWS appears not to have analyzed the impacts to listed species of the newly mandated route (Alternative 1 as described in the FSEIS). Furthermore, the FSEIS states that:</p> <ul style="list-style-type: none"> - “The Revised Proposed Route for Segment 8 would cross approximately 0.3 mile of known occurrences, 7.5 miles of occupied habitat, 31.1 miles of slickspot peppergrass habitat, 18.7 miles of potential habitat, and 0.8 mile of proposed critical habitat.” FSEIS at 3.7-3. - “The Revised Proposed Route and FEIS Proposed 9 would each cross approximately 0.4 mile of potential habitat for slickspot peppergrass. ...” FSEIS at 3.7-4. Existing management plans must be amended to allow construction in and near Slickspot peppergrass habitat. <p>These documented impacts to Slickspot peppergrass seem to obviously contradict USFWS’s “no impact determination” (attached to the most recent Record of Decision). BLM must reinitiate consultation as part of this SEA process</p>	<p>The BLM continues to work with the USFWS to ensure that the Project complies with the ESA, in accordance with the Conference Opinion for the Gateway West Transmission Line which states the following:</p> <p>2.10 Reinitiation Notice</p> <p><i>This concludes formal conference on slickspot peppergrass and its proposed critical habitat. Because the “take” prohibitions detailed under section 9(a)(1) of the Act do not apply to listed plants, requirements for re-initiation of formal consultation associated with incidental “take” as described below are not applicable to listed plants, including slickspot peppergrass, should the species become listed in the future.</i></p> <p>As provided in 50 CFR §402.16, reinitiation of formal consultation is required where discretionary Federal agency involvement or control over the action has been maintained (or is authorized by law) and if:</p> <ol style="list-style-type: none"> 1. The amount or extent of incidental take is exceeded. 2. New information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this CO.

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				to determine how the new route will affect slickspot peppergrass.	<p>3. The agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this CO.</p> <p>4. A new species is listed or critical habitat designated that may be affected by the action.</p> <p>In instances where the amount or extent of incidental take is exceeded, any operations causing such take must cease pending re-initiation.</p>
EA-14	4	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Collision and Electrocution Risks to Migratory Birds</p> <p>The SEA should analyze in detail the Project's potential collision and electrocution impacts to birds paying special to mortality estimates and how they will change depending on route micrositing. Although the Project's FSEIS and Final Environmental Impact Statement (FEIS) discussed the potential for bird mortality resulting from transmission line collisions and electrocutions, they did not attempt to quantify bird losses. This omission should be remedied in the SEA. BLM must consider the direct, indirect, and cumulative impacts upon the various bird species most likely to be impacted.</p> <p>Loss et al's 2014 analysis of bird mortality at U.S. transmission lines estimated that between eight million and 57 million birds are killed annually in the United States by collisions with transmission lines and an additional 0.9 million to 11.6 million are killed by electrocution at distribution lines.¹ Loss et al at 6. The study found a median annual mortality of 29.6 transmission line collision deaths per kilometer/pole and 0.030 distribution line electrocution deaths per kilometer/pole. Loss et al at 7. This suggests that the Project's annual collision mortality for Segments 8 and 9 will be influenced by the final length of the Project, which is subject to change depending on route micrositing. However, the FSEIS's length estimate of approximately 474.76 kilometers for Segments 8 and 9 together suggests a reasonable estimate of the Project's bird collision deaths would be approximately 14,053 annually.²</p>	<p>Bird mortality, including birds covered by the MBTA, is analyzed in Sections 3.10 and 3.11 of the EIS and SEIS. Also see Section 5.2.3 of the 2017 ROD for a discussion of how the Project would comply with the MBTA.</p>

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				<p>Since the Project is estimated to have a working life of 50 years (FSEIS at 2-72), the BLM is making a decision that will foreseeably result in the collision deaths of an estimated 702,650 birds.</p> <p>Significantly, most of the bird species found in the Project Area are protected by the Migratory Bird Treaty Act (MBTA), which has been interpreted by USFWS, courts and others as prohibiting even unintentional take.³ Because increases or decreases in the Project's length will change the number of MBTA-protected birds the Project kills, it is important for the BLM to analyze bird mortality by micro-siting variant. According to the BLM's Memorandum of Understanding with USFWS, which guides BLM implementation of Executive Order 13186 ("Responsibilities of Federal agencies to Protect Migratory Birds"), the BLM shall "[a]t the project level, evaluate the effects of the BLM's actions on migratory birds during the NEPA process, if any, and identify where take reasonably attributable to agency actions may have a measurable negative effect on migratory bird populations, focusing first on species of concern, priority habitats, and key risk factors. In such situations, BLM will implement approaches lessening such take." MOU at 6.</p> <p>Since the route corridors the BLM has been analyzing are broad, without the current ROW and its map the public is in the dark as to which bird-sensitive locations would be crossed by the Project at the micro-siting level. Possibilities include sensitive areas crossed by FSEIS Alternative 1 routes, including the Ducks Unlimited Bruneau Conservation Area, at least one Idaho Power Wetland Conservation Area, a Ducks Unlimited Wetlands Conservation Area, the Malad and Snake Rivers, and Salmon Falls Creek. Bird-sensitive areas that would be crossed by or near to the Project and the types of bird species they host (e.g., waterfowl, raptors) should be discussed in the SEA because different types of birds have differing likelihoods of transmission</p>	

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				<p>line collision and electrocution. In addition, as Loss et al points out, “Furthermore, mortality at power lines may contribute to population declines for some species, as evidenced by studies documenting that power line-caused mortality can cause a large percentage of total mortality for species from several avian orders.” Loss et al 1. These impacts also affect the amount and type of mitigation the BLM should require.</p> <p>Moreover, because the reasonably anticipated bird mortality for this Project is so high and could well include BLM Sensitive Species and USFWS Birds of Conservation Concern, the BLM should require bird mortality monitoring throughout construction and for at least three years after operation begins. Since birds are a public trust resource, the results of the monitoring should be made publicly available. The SEA should also discuss how the monitoring will be conducted, so that the public can assess and comment on the proposed study methodology.</p>	
EA-14	5	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Mitigation</p> <p>Because portions of the Project route have been established by legislation, BLM’s alternatives are necessarily limited. The agency’s NEPA analysis will therefore focus heavily on mitigation. The agency may be tempted to dismiss environmental concerns on the ground that its hands are effectively tied. And it might, for the same reasons, attempt to rely heavily on future mitigation measures in its analysis.</p> <p>However, mitigation does not relieve the agency of its information gathering obligations under NEPA, and mitigation must be sufficiently specific and likely to occur. As one court put it, “even though an agency need not actually mitigate the identified harms, it must perform some assessment of whether the mitigation measures would be effective,” including an estimate of how effective mitigation measures would be if adopted or a reasoned explanation as to why such an estimate is not possible. High Sierra Hikers Ass’n v. U.S. Dep’t of Interior, 848 F.Supp 2d 1036,</p>	<p>The BLM will consider mitigation based on applicable legislation (including H. R. 2104 which includes mitigation guidelines for the portion Segments 8 and 9), BLM regulations, and approved planning use plans. Mitigation for impacts to the NCA will be covered by the conditions outlined in HR 2104.</p>

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				<p>1049-51 (N.D. Cal. 2012). "Mitigation measures may help alleviate impact after construction, but do not help to evaluate and understand the project before construction." Northern Plains Resource Council, Inc. v. Surface Transp. Bd., 668 F.3d 1067, 1084 (9th Cir. 2011). Put differently, an agency may not "assume ... there are mitigation measures that might counteract the effect without first understanding the extent of the problem." Id. at 1084-85.</p> <p>These obligations are especially relevant because in the previous Record of Decision (ROD) for segments 8 and 9, the BLM conditioned its decision on a complex mix of mitigation plans:</p> <p>This decision is conditioned on mitigation plans that can be monitored during implementation to ensure effectiveness and durability, as identified in the Final SEIS, and includes the final Project Plan of Development (POD), a Migratory Bird Habitat Conservation Plan, a Comprehensive Sage-Grouse Habitat Mitigation Framework Plan, Historic Property Treatment Plans (HPTPs) prepared under the guidelines in the PA, the Conservation Mitigation Framework and Plan for the SRBOP, and the issuance of all necessary local, state, and Federal approvals, authorizations and permits.</p>	
EA-14	6	9-27-17	Western Watersheds Project – Kelly Fuller	<p>FSEIS ROD at 15-16.</p> <p>However, at the time of the previous ROD, some of the mitigation plans for wildlife and habitat were merely frameworks and not fully developed. As we explained in our appeal to the Interior Board of Land Appeals, this was insufficient to meet the BLM's legal obligations. In addition, our appeal explained that the previous mitigation plans did not provide mitigation for sage-grouse outside the NCA. IBLA appeal at 4-5.4 This problem intensified when Congress removed the Project routes from the NCA by changing the NCA boundaries. While the Modification Act prescribed using the Compensatory Mitigation and Enhancement framework, BLM at a minimum</p>	As stated in the EIS and SEIS, mitigation plans cannot be finalized until the selected routes are fully surveyed and the design is complete. Micro-siting may allow the Project to avoid or reduce impacts.

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				must fulfill its obligations by providing a detailed, specific mitigation analysis in the SEA, using a completed version of the framework.	
EA-14	7	9-27-17	Western Watersheds Project – Kelly Fuller	The framework should include closing livestock grazing allotments in any area occupied by the same sage-grouse population affected by the transmission line. In addition to providing a conservation benefit for greater sage-grouse and other species, this would be a cost-effective use of mitigation funds.	Comment noted.
EA-14	8	9-27-17	Western Watersheds Project – Kelly Fuller	Net Conservation Gain for Greater Sage-Grouse and Cumulative Impacts The SEA and ROD for this reconsidered decision should make a firm commitment to a net conservation gain for sage-grouse mitigation standard. However, since Department of the Interior sage-grouse management may be changing, it is important that the SEA analyze direct, indirect, and cumulative impacts of the Project on greater sage-grouse both with and without a net conservation gain for sage-grouse mitigation standard. Furthermore, as we pointed out in our Interior Board of Land Appeal of the previous ROD, the BLM's analysis of cumulative impacts on sage-grouse was also inadequate, with BLM admitting that the cumulative impacts would be "substantial" but providing no actual analysis of how it would change the extinction probability of the affected sagegrouse populations at any scale. IBLA appeal at 1-2. This should be remedied in the SEA.	Comment noted.
EA-14	9	9-27-17	Western Watersheds Project – Kelly Fuller	Eagles The SEA should analyze the Project's impacts on bald and golden eagles in detail, including local eagle population numbers, numbers of nests and presence of foraging habitat. This is especially important because Appendix K of the FSEIS (Compensatory Mitigation Framework for the Morley Nelson Snake River Birds of Prey National Conservation Area) is silent on proposed mitigation for bald and golden eagles. Raptors in general are mentioned, but legal requirements for	The EIS and SEIS do analyze Project effects on eagles; see Section 3.11 and the tables in Appendix D.11. Also see the map of bald and golden eagle nests in Appendix E (Figure E.10-3).

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				<p>eagles are different than for raptors since eagles are protected by the Bald and Golden Eagle Protection Act (BGEPA), not just the MBTA that protects raptors. BGEPA prohibits even unintentional take without an eagle take permit, and programmatic eagle take permits are available through USFWS.</p> <p>Given that the Project would pass near eagle nests and through eagle foraging habitat, the SEA should also discuss the programmatic Eagle Take Permit that the Project will need in order to avoid legal liability for the eagle mortality that the Project will cause. Even with construction timing restrictions designed to avoid eagle nests, the Project has a high risk of eagle mortality because of collisions with the transmission lines that will occur over the Project's 50 year life span.⁵ USFWS acknowledges the risk transmission lines pose to eagles in the FPEIS for the recent eagle take permit regulation revisions: "Utilityscale wind energy facilities and electric transmission companies are likely to be the most frequent long-term permit applicants because of the known risk to eagles from collisions with wind turbines and electric power lines." Eagle Take Permit FPEIS at 143.</p>	
EA-14	120	9-27-17	Western Watersheds Project – Kelly Fuller	<p>Resource Management Plan Amendments</p> <p>The NOI for the SEA states that this Project will require amendments to the Kuna, Bennett Hills/Timmerman Hills, and Jarbridge RMPs. Appendix F of the FSEIS supplied some analysis of amendments to the Kuna and Bennett Hills RMPs. However, Appendix F does not discuss amending the Jarbridge RMP, so it will need to be fully analyzed in the SEA</p>	<p>As stated in the SEIS, no amendments are proposed for the 2015 Jarbridge RMP. As discussed in Chapter 1 of the FSEIS and in Appendix F of that document, the 2015 Jarbridge RMP does not cover all of the area covered by the 1987 RMP. Amendments to the 1987 RMP were disclosed and analyzed in the SEIS. See Appendix F for details.</p>
EA-15	1	9-27-17	Coalition of Local Governments – Kent Connelly	<p>On August 28, 2017, the Bureau of Land Management ("BLM") published in the Federal Register a Notice of Intent to Prepare an Environmental Assessment ("EA") to Reconsider the January 19, 2017, Record of Decision Approving Segments 8 and 9 for the Gateway West Transmission Line Project ("Gateway West</p>	<p>Comment noted. Decisions on Segments 1 through 7 and 10 were made in the 2013 ROD. This EA does not reconsider those decisions.</p>

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				<p>Project”). 82 Fed. Reg. 40797. The Coalition of Local Governments’ (“Coalition”) members, Lincoln and Sweetwater Counties, were cooperating agencies on the Gateway West Project and participated throughout the environmental impact statement (“EIS”) process. Segments 1 through 4 of the transmission line travel through Wyoming.</p> <p>New information has developed regarding Segment 4 of the transmission line, including new Wyoming legislation that prevents the expansion of the Cokeville Meadows National Wildlife Refuge Acquisition Areas (“Cokeville Meadows NWR”), which requires reconsideration of the 2013 ROD similar to the BLM’s reconsideration of the 2017 ROD for Segments 8 and 9. Wyoming’s withdrawal of consent for any further expansion of the Cokeville Meadows NWR allows for Segment 4 of the transmission line to be located South of the town of Cokeville as proposed by Lincoln County during the EIS process.</p>	
EA-15	2	9-27-17	Coalition of Local Governments – Kent Connelly	<p>The Coalition objects to the BLM reconsidering its 2017 Record of Decision (“ROD”) for Segments 8 and 9 without also reconsidering its 2013 ROD with respect to Segment 4. The final route location for Segment 4 was decided in a closed door meeting after the FEIS was published and without involving the public, all of the cooperating agencies, or the newly-impacted private landowners. The route selected at this meeting had not been considered in the DEIS or FEIS. The BLM also failed to consider Lincoln County’s proposed cut-over route that would place the transmission line just South of Cokeville, avoiding most of the private lands and residential areas. The BLM gave little consideration to the County’s proposal because it was outside the area analyzed in the FEIS, was outside the designated Wyoming utility corridor, and would require additional permits where it crossed the Cokeville Meadows National Wildlife Refuge Acquisition Areas (“Cokeville Meadows NWR”).</p>	<p>Comment noted. The 2013 ROD did not select routes for Segments 8 and 9 for the reasons stated in that document; therefore, additional NEPA analysis is needed in order to make a decision on those two segments.</p>

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EA-15	3	9-27-17	Coalition of Local Governments – Kent Connelly	In March of 2017, the State of Wyoming passed legislation that prevents the expansion of the Cokeville Meadows NWR. This removes 20,000 acres of land from acquisition boundaries of the NWR and makes it available for location of Segment 4 of the transmission line. The line would then pass South of Cokeville as Lincoln County proposed several years ago. The Coalition strongly encourages the BLM to reconsider its 2013 ROD as it relates to Segment 4 of the transmission line as it is currently doing for the 2017 ROD for Segments 8 and 9.	Comment noted.
EA-15	4	9-27-17	Coalition of Local Governments – Kent Connelly	The route location for Segment 4 of the transmission line was contested throughout the EIS process by the Coalition members, including Lincoln County, and private landowners due the proposed routes that would run near or in the town of Cokeville. All of the routes would have affected a significant amount of private land and residential areas. To avoid the harm to landowners and lost property values, Lincoln County and Cokeville proposed to the BLM a cut-over route South of Cokeville before the FEIS was published. The BLM rejected this proposed route in the FEIS because it was outside the Wyoming Governor's utility corridor and there was insufficient time to incorporate it into the FEIS.	Comment noted.
EA-15	5	9-27-17	Coalition of Local Governments – Kent Connelly	The Coalition protested the 2013 FEIS based on the impacts of the location of Segment 4 near the town of Cokeville and its impact on a significant amount of private land and residential areas. The Coalition also raised the issue that the location of Segment 4 of the transmission line on private lands and residential areas was inconsistent with local land use plans. The BLM denied the protest, but during this time, it also decided that new information impacting the transmission line route for Segment 4 required the consideration of new alternatives. The new information included a landslide area near Dempsey Ridge, the Teichert Brothers LLC wetland conservation easement, a proposed National Resource Conservation	Comment noted.

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				Easement, and Lincoln County's comment letter on the FEIS.	
EA-15	6	9-27-17	Coalition of Local Governments – Kent Connelly	The BLM held an invite only meeting. Of the local government cooperators, Lincoln County attended to discuss the reroute of Segment 4. The BLM considered three different reroutes of Segment 4, all located north of the preferred alternative identified in the FEIS. Lincoln County again proposed its cut-over route South of Cokeville. The BLM again rejected the County's proposal because it was outside the area analyzed in the FEIS, outside the designated Wyoming utility corridor, and would require additional permits where it crossed the Cokeville Meadows NWR area. Over the objections of Lincoln County and Cokeville, the BLM adopted a re-route of Segment 4 that placed the transmission line north of Cokeville across about 6.7 miles of private land and impacting new private landowners. This new route had never been considered in the DEIS or the FEIS.	Comment noted.
EA-15	7	9-27-17	Coalition of Local Governments – Kent Connelly	The Coalition also appealed the ROD to the Interior Board of Land Appeals ("IBLA") because the ROD adopted a new route location for Segment 4 based on three new alternatives that were identified in an invitation-only meeting held after the release of the FEIS. This new route impacted about 6.7 miles of rural residential land without notifying the newly impacted landowners of the significant change in the segment's right-of-way location and despite the strong objections from Lincoln County and the town of Cokeville. The IBLA affirmed the Bureau of Land Management's ("BLM") ROD on September 27, 2016.	Comment noted.
EA-15	8	9-27-17	Coalition of Local Governments – Kent Connelly	One of the main reasons for dismissing Lincoln County's proposed southerly reroute was because it would cross areas proposed for acquisition to expand the Cokeville Meadows NWR. The Cokeville Meadows NWR acquisition boundary was created by a record of decision in 1992 that authorized the U.S. Fish and Wildlife	Comment noted.

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				<p>Service ("FWS") to purchase a total of 26,657 acres of land for the refuge. 57 Fed. Reg. 45640 (Oct. 2, 1992); see Comprehensive Conservation Plan - Cokeville Meadows National Wildlife Refuge, Wyoming at 17 (Mar. 2014) ("Cokeville CCP"). The principal legislative authority for the land acquisitions was the Migratory Bird Conservation Act. Proposed Cokeville Meadows National Wildlife Refuge DEIS at 4 (Oct. 1990) ("Cokeville DEIS"). Under this Act, "[n]o deed or instrument of conveyance in fee shall be accepted by the Secretary of the Interior . . . unless the State in which the area lies shall have consented by law to the acquisition by the United States of lands in that State." 16 U.S.C. §715f (emphasis added). If land is acquired using funds from the migratory bird conservation fund, then approval of the State Governor or appropriate State agency is also required. 16 U.S.C. §715k-5 (Section 3 of the Wetlands Act of 1961 (Loan Act)).</p> <p>In February 1989, the Wyoming Legislature approved an act enabling the FWS to acquire about 27,000 acres of land south of Cokeville for the refuge. See Wyo Stat. §23-1-106(a) (2016). The consent was conditioned on acquisitions occurring between willing seller and willing buyer instead of condemnation, ability for landowners to reserve mineral rights, and executing agreements with the State Engineer regarding state water laws. Wyo. Stat. §23-1-106(b)-(d) (2016). On October 5, 1990, the FWS entered into a memorandum of understanding with the Wyoming State Engineer's Office for the proper administration, management, and development of the Cokeville Refuge consistent with Wyoming State laws governing water rights. Cokeville FEIS at Append. F. While some land was acquired, the refuge is not improved and is not open to the public. There is no formal management of the land acquired.</p> <p>On March 13, 2017, the Wyoming legislature passed a bill that prohibits the expansion of the</p>	

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				<p>Cokeville Meadows NWR. 2017 Wyo. Senate File No. 169 (amending Wyo. Stat. §23-1- 106). The bill revoked the State’s previous consent to the United States proposed land acquisition of about 27,000 acres along the Bear River or in the Bear River area to establish a migratory bird refuge pursuant to the Migratory Bird Conservation Act and the Migratory Bird Hunting Stamp Act. Id. (amending Wyo. Stat. §23-1-106(a)). The bill limited the State’s consent to those lands already acquired by the United States prior to January 1, 2017, which includes only about 7,000 acres. Id. (addition of Wyo. Stat. §23-1-106(f)). These lands are primarily located in the southern portion of the proposed acquisition boundary. Therefore, the Coalition’s proposed cut-over route for Segment 4 would no longer pass through lands set aside for the Cokeville Meadows NWR.</p> <p>Similar to the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act’s reduction of lands from the boundaries of the National Conservation Area where Segments 8 and 9 are now proposed to travel through (82 Fed. Reg. 40797), the Wyoming legislature essentially gutted the lands available for the Cokeville Meadows NWR. This law allows a portion of Segment 4 to be located within the previous NWR acquisition area boundaries. Without Wyoming’s consent, the FWS can no longer acquire any land for the Cokeville Meadows NWR. See 16 U.S.C. §§715f, 715k-5 (requiring State approval for refuges under the Migratory Bird Conservation Act); see also North Dakota v. United States, 460 U.S. 300, 311-16, 321-23 (1983) (A State may revoke its consent if the United States unreasonably delays land acquisition.) This new legislation, therefore, requires the BLM to reconsider its 2013 ROD for Segment 4 of the Gateway West Project. Locating Segment 4 South of Cokeville will impact fewer private landowners, would improve the National Environmental Policy Act compliance, and would be consistent with local</p>	

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				land use plans. Reconsidering the 2013 ROD for Segment 4 will also allow the BLM to restore confidence in its EIS process and involve the public and local land owners in the final decision for the route location near the town of Cokeville.	
EA-16	1	9-27-17	Karen Steenhof	Thank you for the opportunity to provide comments on issues, potential impacts, and mitigation measures that may not have been addressed in the 2016 Final Supplemental Environmental Impact Statement (EIS) about Segments 8 and 9 of the Gateway West Transmission Line Project. I am happy to see that the BLM is moving forward with plans to route the transmission lines within the corridor recommended by the Boise District Resource Advisory Council subcommittee. The BLM should anticipate that minor adjustments may be necessary within and adjacent to the recommended corridor to protect resources and private land. Specific and comprehensive mitigation measures should be clearly identified in the EA. In addition to restoring vegetation, mitigation should include artificial nesting platforms for raptors, particularly in the area between Con Shea Basin and the Hemmingway Substation, where Golden Eagle reproduction has been affected adversely by motorized and non-motorized recreation. Platforms like those designed by Morley Nelson for the PP&L line will provide more secure nesting locations for eagles in those areas. As the representative of the Raptor Research Foundation on the Boise District RAC, I look forward to providing additional input as the EA preparation process continues.	Comment noted. The BLM will consider mitigation based on applicable legislation (including H.R. 2104 which includes mitigation guidelines for the portion Segments 8 and 9), BLM regulations, and approved planning use plans.
EA-17	1	9-16-17	Wildlands Defense – Katie Fite	The 2017 Gateway Federal Register Notice states BLM is reconsidering the right of way approval for Gateway Segments 8 and 9 - as a result of the 2107 modification of the boundaries of the SRBOPA. ABLM also is: "including the potential amendment of several Resource Management Plans (RMPs) and Management Framework Plans (MFPs) in the project area". As we discuss later, the old, out-dated and deficient	Comment noted.

COMMENT					RESPONSE
Letter #	Comment #	Date	Author	Comment	
				LUPs plus the gutting of regulations and even the GRSG ARMPA by Trump/Zinke must be fully analyzed in this current process. These are radically changed circumstances.	
EA-17	2	9-16-17	Wildlands Defense – Katie Fite	An EIS must be prepared to take a hard and thorough look at all direct, indirect and cumulative effects of this project. This is especially necessary since the project area includes lands managed under archaic old Land Use Plan documents so there is no current inventory of the lands; none of the existing LUPs adequately address climate change; Interior is rolling back GRSG protections – jeopardizing sage-grouse and other sensitive and imperiled species, there have been greatly inadequate current site-specific studies for the line and the exact course of all potential segments has not been adequately mapped and provided to the public, assaults on all facets of the environment are escalating enormously under Trump/Zinke – so environmental safeguards that might have been taken for granted (such as Clean water Act provisions and enforcement of environmental regulations including everything from sensitive species protections to controls on grazing damage to public lands in the affected landscape) under the Obama-era analysis no longer are valid.	The EIS and SEIS did take a hard look at the direct, indirect, and foreseeable cumulative effects of this Project. See the extensive tables, maps, and text in these documents and the appendices to these documents.
EA-17	3	9-16-17	Wildlands Defense – Katie Fite	Environmental issues in Idaho are highly politicized, and DEQ and other oversight bodies cannot be counted on to protect the public, the environmental human health, etc. If more oversight devolves to the state, outcomes will be less and less certain, and the mitigation bar must be much higher.	Comment noted.
EA-17	4	9-16-17	Wildlands Defense – Katie Fite	Further, the B2H project to which Gateway is very closely linked is facing even more citizen and local official opposition. People are alarmed at the lack of specificity of proposed paths of that line, failure to adequately inform landowners, impacts to the environment, lack of need for the line, inadequate and highly uncertain mitigation, failure	Comment noted. Please see the Chapter 4 section of the SEIS for a discussion of how the B2H project may contribute to cumulative effects of Gateway West.

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Letter #	Comment #	Date	Author	Comment	
				to minimize adverse environmental footprint, etc. – and here as in Gateway the likelihood that other lines and energy sprawl will seriously degrade the environment following building of these unneeded transmission lines	
EA-17	5	9-16-17	Wildlands Defense – Katie Fite	BOTH these projects - Gateway and B2H - are unneeded out-moded dinosaurs that are destructive to the environment, and highly wasteful of materials and energy used to manufacture and transport the materials. The energy and transmission landscape has changed markedly since these musty projects were first scoped. Much of the environmental data and scientific information including research upon which the analyses rely is old or out-dated. Just how unnecessary these projects are is apparent to anyone driving on the Freeway between Boise and Mountain Home. More and more localized solar and other energy is being produced not just in Idaho, but across the region. Thus – there is no need for long distance transport of energy – as oppoeents of the line have been claiming all along. The times they are a –changin’. New technological changes (especially those related to renewable energy), and changes in the energy generation and use landscape must be fully assessed in an EIS here.	Comment noted.
EA-17	6	9-16-17	Wildlands Defense – Katie Fite	ALL Foreseeable Linked Projects Must be Assessed, and Development Sprawl Must Be Examined and Estimated We are greatly concerned about new military projects proposed and/or foreseeable in the area, and other proposed development that will harm public lands, the SRBOPA raptors, and other native biota and values of the public lands.	Please see Chapter 4 section of the SEIS for a discussion of how the B2H project may contribute to cumulative effects of Gateway West. The EA will consider if additional projects may need to be considered.
EA-17	7	9-16-17	Wildlands Defense – Katie Fite	BLM Has Never Adequately Considered Alternative the EA Seeks to Impose The Fed Reg Notice also states: "The BLM analyzed the impacts of the alternative that it is reconsidering in the 2016 Gateway West Final Supplemental Environmental Impact Statement (EIS)."	The EIS and SEIS took a hard look at the direct, indirect, and foreseeable cumulative effects of this Project. See the extensive tables, maps, and text in these documents and the appendices to these documents.

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Letter #	Comment #	Date	Author	Comment	
				<p>WildLands Defense and Prairie Falcon Audubon have long been concerned about the inadequacies of the Gateway environmental analysis of direct, indirect and cumulative effects. For example, we have extensively commented (and Protested) the ways in which the preceding BLM EIS analyses failed to take a candid and hard look at the Gateway Project need and environmental footprint, and linked and foreseeable project sprawl's significant adverse environmental effects to waters, watersheds, native vegetation communities (and elevated invasive species problems), risk of elevated wild land fires, recreation, human residents, important, sensitive and listed species, national trails, other historic and cultural sites.</p> <p>BLM analyses to date have also failed to assess the significant adverse effects on natural values of the public lands and added stress from climate change - impacting rehab, mitigation associated with the line and linked disturbance, as well as the very significant stress these will exert on important, sensitive and imperiled native biota. We have long been concerned about the serious and significant adverse effects of Gateway on important and sensitive native biota across the region, and this has never been adequately examined in a serious hard look NEPA analysis. Adequate alternatives and mitigation have not been considered.</p> <p>BLM has also failed throughout this process to seriously address the dramatic decline in nearly all species of native biota in the regions impacted by the Gateway Line and the linked and inter-connected B2H transmission line. There is no candid analysis of the status local and regional wildlife, rare plant, and other populations, and threats to their persistence and viability.</p>	
EA-17	8	9-16-17	Wildlands Defense – Katie Fite	Increased Military Activity and Destructive Training Expansion Threatens Biota and Recreation in Gateway Landscape – OTA Expansion in SRBOPA, Saylor Creek, Others???	The EA will consider the expansion of the military training area in a proposed land exchange still under development in its assessment of cumulative effects.

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Letter #	Comment #	Date	Author	Comment	
				<p>We are also concerned about potential increased military expansion activities impacting public lands, wildlife habitat (raptors, sensitive species, important species, migratory birds) and populations including through both disturbance and habitat loss, habitat fragmentation, and linked population declines, watersheds, recreation and many other values of the public land in this area. Right now, the BLM is scoping a proposal to issue rights-of-way to the National Guard so the Guard can tear up a whole new area - a block of state land in the SRBOPSA. This will further isolate and impinge on habitats and species occupying a northern area of the SRBOPA, and it will endanger residents,</p> <p>While the 2017 legislation expanded the Birds of Prey Area near the Snake River to the east, this is located in very close proximity to the Saylor Creek Bombing Range where all hazardous military "training" activity takes place. The fire frequency is off the charts. Gateway threads a very narrow needle here. We are concerned that the quality of habitat will be significantly degraded and compromised by the combination of incessant military noise, use of hazardous equipment and substances such as white phosphorus at Saylor Creek, and now a powerline right by the little extension of the SRBOPA. Saylor Creek activities are a never-ending cause of wild lands fires in the region, and the lands are vulnerable to increased fires with increased activities. White phosphorus (extremely flammable substance used in War Crimes) is increasing. We are concerned that potential new or expanded activities on Saylor Creek and for the USAF and/or National Guard across this area may be facilitated by Gateway. The USAF finalized an EA with very limited public circulation that greatly increases many activities and uses of hazardous substances. There is also public concern that a proposed land trade between BLM and the state of Idaho related to the Owyhee</p>	

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				<p>Initiative will result in military or other extensive development in the Big Hill area.</p> <p>The Project proponent throughout this process has refused to clearly lay out why this line is needed, and who and where the customers are, how much energy they require and/or will produce, and what activities the powerline will actually support. This is a very serious analysis void that has never been adequately addressed, despite thousands of pages of documents and reports. For example, how much energy does the USAF at Saylor creek or the OTA currently use? How much are they projected to use, and how is it related to a claimed "need" for Gateway?</p> <p>We are concerned that the adverse environmental effects of foreseeable and/or potentially linked and/or connected actions associated with military activity/training expansion and/or large-scale energy projects have not been revealed and analyzed in the Gateway and linked B2H documents to date. Thus, no hard look has been taken.</p>	
EA-17	9	9-16-17	Wildlands Defense – Katie Fite	<p>BLM Is Authorizing Increased Grazing in path of Gateway Line, and Purposeful Destruction of Recovering Native Vegetation by BLM</p> <p>To the east in lands managed by Burley BLM in proximity to Gateway, BLM is proposing a series of livestock grazing changes that are adverse to the public interest, and will adversely impact habitat for many sensitive species. BLM is renegeing on it conservation promises for many important and sensitive species, and also adversely impacting public recreation and use and enjoyment of public lands.</p> <p>In the Burley BLM Loughmiller and U2 tracts (see Attached Comments and Appeal), BLM proposes to increase cattle stocking for the brother of a powerful Idaho State Senator (Sen. Brackett). Gateway runs right through this area. We are very concerned that the cumulative effects of this have not been adequately analyzed. Native sensitive species will suffer increased habitat disturbance and degradation. BLM refuses to</p>	<p>Expanding or restricting grazing authorizations is beyond the scope of this EA. The SEIS discloses in Chapter 3 that grazing has affected habitat across the project area and considers in Chapter 4 how grazing adds to cumulative effects.</p>

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				<p>manage to recover native species, and instead stocks public lands to the gills based on exotic harmful crested wheatgrass, which is nearly devoid of any value for native biota.</p> <p>BLM is also relying on seriously flawed FRH Findings (Land Health) in its claims about the health these lands. It is imperative that the Gateway analyses examine and assess BLM management and constant concessions to the livestock industry. This constantly works to undermine protections for species, trails, cultural sites recreation, etc. This culture of concessions also adversely impacts any claimed rehab and recovery as well as effectiveness of mitigation and minimization actions from Gateway and associated development disturbance; the validity and effectiveness of any mitigation; and other measures that are supposed to somehow make up for the serious and significant gateway disturbance in this landscape.</p> <p>In other Burley lands, in a the large block of land comprising the Berger Tracts, an area of long-term concern with PFA and other local conservationists who have sought to conserve the wildlife habitats and species that have managed to hold on in this site, BLM is proposing to purposefully destroy native sagebrush and rabbitbrush - in order to promote livestock forage for a group of cow and sheep ranchers who have seriously abused these lands over many decades.</p> <p>The public lands permittees refuse to graze within the capacity of the land, and BLM accommodates them by killing native plants that are so vital in this area.</p> <p>It is also impossible to determine what is going on with stocking and use/management of livestock in BLM's confusing analysis – especially when actual Use is taken into account. The Proposed BLM action here impacts a very significant block of public land east of Salmon Falls Creek and the ACEC and other important lands. Raptors and other native biota will be adversely impacted by</p>	

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				further destruction of prey species habitats and other ramifications of the BLM's Berger Tract proposal. Not to mention the proposed military expansion onto a block of state land in the OTA. The documents associated with the Berger tract proposal also show the degree to which BLM is abdicating its conservation promises for greater sage-grouse.	
EA-17	10	9-16-17	Wildlands Defense – Katie Fite	BLM/Zinke Has Abandoned Sage-Grouse Plans, and Regulations Are Being Gutted BLM must also take a candid and hard look at Interior Sec. Zinke's gutting of the sage-grouse plans and RMP amendments. Many of the assumptions BLM made for GRSG (and other sensitive species) conservation, management and/or mitigation in the landscape impacted by Gateway and B2H are now going to be directly indirectly and/or cumulatively undermined. Now the whole set of assumptions that Gateway segment analysis was based on are invalid. We stress that that several of the Land Use Plans currently in place in this landscape are woefully out-dated – such as the Twin Falls MFP, Timmerman, and Kuna - as well as several others along thr Gateway Route. The Berger and U2/Loughmiller lands are managed under 1970s paradigms. This is not a current	Mitigation for sage-grouse will be implemented in accordance with the science-based HEA prepared for the Project in 2013. See Appendix J of the 2013 FEIS.
EA-17	11	9-16-17	Wildlands Defense – Katie Fite	BLM Failures to Comply with Conservation Measures of More Recent LUPS Must Also Be Assessed In other areas, such as the SRBOPA, where BLM has a circa 2008 RMP, management was supposed to be based in significant part on large-scale restoration This has NEVER Taken place. This is because livestock interests resist efforts to rest lands for a time period sufficient to enable recovery of rehabbed lands. BLM is hamstrung by the livestock industry, and never is able to conduct effective rehab and/or restoration actions in lower and mid elevation communities as a result. The end result is this landscape that is to be torn apart by gateway disturbance and	The Project must be consistent with existing land use plans, as amended. See Appendix F of the EIS/SEIS.

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				associated and linked development sprawl is in a downward death spiral.	
EA-17	12	9-16-17	Wildlands Defense – Katie Fite	FULL new indirect and cumulative Effects Analysis and Analysis of Mitigation for the entire path of the line Must Be Re-examined and Updated, Since Trump Zinke Are Stripping GRSG and other Protections	Comment noted.
EA-17	13	9-16-17	Wildlands Defense – Katie Fite	<p>The Scoping Notice also states: “PacifiCorp, dba Rocky Mountain Power, and Idaho Power (Proponents) submitted an initial ROW application under FLPMA in 2007 to locate 500-kV electric transmission lines on Federal lands as part of the Project. The original Project comprised 10 transmission line segments originating at the Windstar Substation near Glenrock, Wyoming, and terminating at the Hemingway Substation near Melba, Idaho.</p> <p>After completing NEPA analysis in an EIS, the BLM issued a Record of Decision (ROD) in November 2013 that authorized routes and associated land use plan amendments on Federal lands for Segments 1 through 7, and Segment 10, but the BLM deferred a Decision for Segments 8 and 9 in southwestern Idaho”.</p> <p>Since there are now dramatically changed circumstances re: environmental regulations and controls, and mitigation for sage-grouse and other sensitive species and values of the public lands, BLM must use the current EIS process to provide for updated analysis and mitigation.</p>	Decisions on Segments 1 through 7 and 10 were made in the 2013 ROD. This EA is evaluating Segments 8 and 9 in accordance with H.R. 2104.
EA-17	14	9-16-17	Wildlands Defense – Katie Fite	<p>The Scoping Notice omits the fact that WLD and PFA also appealed the Segment 8 and 9 FEIS. ALL of the following were not adequately assessed in the FEIS process, including:</p> <p>issues and concerns in the Final Supplemental EIS for Segments 8 and 9 of the Project:</p> <p style="padding-left: 40px;">Effects to the objects and values for which the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) was designated;</p> <p style="padding-left: 40px;">Land use conflicts and inconsistency with land use plans;</p>	Comment noted. For the record, an FEIS cannot be appealed; it is not a decision document. We apologize for not acknowledging in the NOI that your organization appealed the 2017 ROD.

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				<p>Effects of the project on local and regional socioeconomic conditions;</p> <p>Effects on wildlife habitat, plants, and animals, including threatened, endangered, and sensitive species;</p> <p>Effects to visual resources and existing view-sheds;</p> <p>Effects to historic and cultural resources;</p> <p>Effects to Indian trust assets;</p> <p>Opportunities to apply mitigation strategies for on-site, regional, and compensatory mitigation; and</p> <p>Siting on private lands versus public lands.</p> <p>Moreover, as we have discussed elsewhere here, the sands are ever-shifting in regards to the following and the gutting of environmental laws and regulations:</p> <p>Existing laws, regulations, and BLM policies; Plans, programs and policies of other Federal, State, and local governments, and Indian tribe; national energy policy and plans; public welfare and safety.</p>	
EA-17	15	9-16-17	Wildlands Defense – Katie Fite	<p>Cost to Public</p> <p>There has still never been an honest accounting of the cost of this project to the public, to residents, to ratepayers. This includes both direct and indirect costs, losses over time as the dinosaur line becomes more and more out-moded, as well as losses of scenic viewsheds and trail settings, wildlife habitats and populations, recreational uses and enjoyment, property values, etc.</p>	<p>Comment noted. The EIS and SEIS disclosed costs and benefits based on what was known at the time. Your comment that costs and benefits change over time is correct; they do fluctuate over time, both up and down.</p>
EA-17	16	9-16-17	Wildlands Defense – Katie Fite	<p>Full Array of Threats to Raptors, SRBOPA Values, Sensitive Species Must Be Assessed</p> <p>It is vital that new baseline studies that take into account the serious threats that native raptors, sensitive species, SRBOPA values face – and a full assessment of all of these factors across the length of the line must be undertaken.</p>	<p>Please see the analysis in Sections 3.10 and 3.11 of both the EIS and SEIS; also see the figures in Appendix E and the tables in Appendix D of these documents.</p>

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EA-17	17	9-16-17	Wildlands Defense – Katie Fite	<p>Alternatives</p> <p>We again raise the issue of alternatives, as we have discussed in previously submitted comments, protests, etc.</p>	Comment noted. Please see the discussion in Section 2.5 of the SEIS. Over 50 alternative routes were considered for Segments 8 and 9.
EA-18	1	9-28-17	Wildlands Defense – Katie Fite	<p>We received NO acknowledgement that we submitted scoping comments earlier. Please confirm that you received those. AND that you have received these additionally submitted documents.</p> <p>Here are additional supporting documents to accompany WLD and PFAs Sept 2017 Scoping comments.</p> <p>Also, Please include Julie Randell's signature on our earlier submission. It was inadvertently omitted.</p>	The BLM does not typically send an acknowledgement to each person who submits a comment during scoping. However, the BLM did acknowledge your letter via email when asked.
COMMENTS FROM COOPERATING AGENCIES					
Cooperating Agency (CA)-1	1	9-13-17	City of Kuna, ID – Mayor Joe Stear	<p>I would like to thank you and BLM for your efforts in this project to keep the cooperating agencies up to date as well as addressing concerns. This has been huge undertaking for your office and the efforts to keep the public informed have been well received and appreciated.</p> <p>One of the first things that I did as Mayor was to work with former Mayor Greg Nelson to get a complete understanding of this project and his goals and objectives. Mine remain the same.</p>	Comment noted.
CA-1	2	9-13-17	City of Kuna, ID – Mayor Joe Stear	<p>The proposed segments remain in an area that does not impact the city of Kuna in any harmful manner and I appreciate that.</p> <p>I do offer my support for the proposed routes as presented.</p>	Comment noted.
CA-2	1	9-25-17	Idaho Governor's Office of Energy & Mineral Resources – John Chatburn	<p>The State has long advocated for the utilization of the common-sense, consensus routing alignment that is represented by Alternative 1 in the Final Supplemental Environmental Impact Statement (SEIS).¹ Despite objection by Idaho, BLM published its Record of Decision (ROD) on the last day of the previous administration, adopting an unacceptable route through the untouched canyon lands in Owyhee County, Idaho.² The State promptly filed a notice to appeal the ROD with the Interior Board of Land Appeals.³ IBLA</p>	Comment noted.

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				remanded the Project ROD to BLM.4 Congress later passed the FY 2017 Consolidated Appropriations Act, directing BLM to approve a right-of-way application for Segments 8 and 9 of the Project, and enabling the use of Alternative I routing within the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA).5	
CA-2	2	9-25-17	Idaho Governor's Office of Energy & Mineral Resources – John Chatburn	In response to these actions, BLM is preparing an Environmental Assessment (EA) for public lands identified in Alternative I which fall outside the NCA boundaries and is seeking scoping comments, to be submitted on or before September 27, 2017.1 While the majority of the State's concerns pertaining to Alternative I were thoroughly analyzed and addressed prior to the SEIS processes, the State of Idaho respectfully requests that BLM thoroughly analyze and address the following issue in the EA: Bruneau Sand Dunes State Park (Park) is undergoing "International Dark Sky Park" certification. Please assess any potential impact that the lighting requirements on Segment 9 of the Project, located near the Park, may have upon the night sky of the Park, and whether the lighting would prevent the Park from meeting "Dark Sky" requirements.	The State's request concerning the Bruneau Dunes State Park is noted. Infrared obstruction lights that incorporate both red and infrared light-emitting diodes (LEDs) in a single unit would be installed in specific areas of Segment 8 and 9 to ensure visibility for aircraft pilots. The system will use a universal, compact, and efficient obstruction light that has been Electrical Testing Laboratories (ETL) certified to Federal Aviation Administration (FAA) requirements. In order to ensure that the intensity of lighting is not so bright as to render the pilots' night vision goggles ineffective, the Proponents propose to use equipment with peak lighting intensities of 860 nanometers for the infrared lights and 30 to 50 candelas for red lighting. Lights of these intensities are not likely to adversely affect the Park's Dark Sky Certification. Guidelines allow parks to have unshielded lights that are less than 50 lumens and shielded light above 50 lumens are permitted. Lights outside the park are not prohibited. The 2016 Guidelines state: "Where necessary for basic safety and navigation: 1. Illumination should be to the minimum practical level, 2. The affected area of illumination should be as small as practical, 3. The duration of the illumination should be as short as practical, and 4. Illumination should minimize the amount of blue spectral components in the light (white light is not permitted)." The proposed red and infrared lights would appear to comply with these guidelines.
CA-3	1	9-27-17	USEPA – Erik Peterson	The EPA has been engaged in this project over time. We provided comments to the BLM on the Gateway West Transmission Line Project in	Comment noted.

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				2008, 2011, 2013, 2014, June 2016, August 2016, and November 2016. Our November 2016 Final Supplemental EIS (FSEIS) comments note our appreciation for the BLM's responsiveness on: Analyzing the impacts of the No Action Alternative; Compensatory mitigation for Nation Conservation Area Impacts; The application of Environmental Protection Measures on different land ownerships; and Clean Water Act mitigation activities.	
CA-3	2	9-27-17	USEPA – Erik Peterson	We appreciate the NOI's statement that the FSEIS mitigation framework "... will apply to authorized segments." The FSEIS's mitigation framework (Appendix K) is key to reducing the EPA's environmental concerns with Segments 8 and 9 of the Gateway West Transmission Line. EPA's concerns with this project were reduced at the Draft Supplemental EIS (DSEIS) and FSEIS stages because the DSEIS included BLM's concerns and recommendations for the Proponent-Proposed Mitigation Enhancement Portfolio (MEP), and because – for the FSEIS, "The BLM worked with the Proponents to develop a framework for compensatory mitigation (Appendix K) that replaces the MEP." Given our support for the FSEIS mitigation framework, we recommend that the EA include information on how this required mitigation will be fully implemented.	The EA will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
CA-4	1	10-4-17	NPS Pacific West Region – Lara Rozzell	The NPS appreciates the listing of federally protected areas and scenic quality rating units. Please provide a clear narrative of impacts to the Oregon National Historic Trail, and also tables that identify specific crossings and related impacts to the NHT.	Please see the detailed maps and analysis in Appendix J of the FSEIS.
CA-4	2	10-4-17	NPS Pacific West Region – Lara Rozzell	Please work directly with the National Park Service as a cooperating agency during alternative generation to identify possibilities for minimizing and mitigating impacts to the NHT.	Comment noted.

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CA-4	3	10-4-17	NPS Pacific West Region – Lara Rozzell	The NPS requests annual communication from the project proponent including a map of the buildout to date. The NPS also requests BLM provide an annual bulleted list summarizing construction progress and completed mitigation in relation to the NHT.	Comment noted.
CA-4	4	10-4-17	NPS Pacific West Region – Lara Rozzell	Please use standard and consistent nomenclature when referring to routes. In the SFEIS, routes are described in places by Alternative number and in other segments of the document as "Revised Proposed Routes" or other nomenclature that is difficult to relate to the Alternative numbers. For instance, Table 3.1-18 contains phrases rather than alternative numbers for routes.	The alternatives in the SEIS were combinations of routes; therefore, the alternatives did not have the same names as the routes. For example, Alternative 3 was composed of the Revised Proposed Route for Segment 8 and Alternative 9K for Segment 9. .
CA-4	5	10-4-17	NPS Pacific West Region – Lara Rozzell	Please clearly explain the relationship between the 1987 and the 2015 Jarbidge RMP's, and why land use plan amendments are proposed for the 1987 RMP if the 1987 RMP is superseded by the 2015 RMP.	This is explained in Chapter 1 of the FSEIS. "The BLM approved a new Jarbidge RMP in July 2015 (BLM 2015a). This new RMP revised the original 1987 Jarbidge RMP, but only applies to land within the current Jarbidge Field Office boundary. However, the planning area for the 1987 RMP included land within the adjacent Four Rivers Field Office. Therefore, the 1987 Jarbidge RMP (unrevised) still applies to these areas. Appendix F of this SEIS provides more detail regarding these and other applicable land use plans." Appendix F includes maps of the various management areas.
CA-4	6	10-4-17	NPS Pacific West Region – Lara Rozzell	If adopted in its entirety, the former "Alternative 1" alignment of the Gateway West transmission line will have 17 adverse impacts to the Oregon National Historic Trail (NHT), compared to three adverse impacts that would have resulted from BLM's preferred alignment. According to the Final Supplemental Environmental Impact Statement for the project, seven of the adverse impacts would be caused by trail crossings on BLM-managed land; eight of the impacts are associated with Segment 8 and nine are associated with Segment 9.	This information is disclosed in Table 2.7-3 of the SEIS, Effects on individual crossings are disclosed in Section 3.1 and Appendix J if the FSEIS.
CA-4	7	10-4-17	NPS Pacific West Region – Lara Rozzell	1. The Sinker Creek High Potential Route Segment is a several mile segment in the area of Murphy, Idaho, starting west of Sinker Butte. The Alternative 1 alignment parallels the historic trail	Comment noted.

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				in close proximity for about 9 miles, in some cases at a distance of a mile or less.	
CA-4	8	10-4-17	NPS Pacific West Region – Lara Rozzell	2. The Alternative 1 alignment would be within about 1.5 miles of the CJ Strike (Cove) Ruts High Potential Historic Site, and the alignment has three crossings of the historic trail within a few miles of the CJ Strike (Cove) site. The CJ Strike or Cove site is a BLM interpretive location for the National Historic Trail. One of the crossings appears to occur within the Sinker Creek High Potential Route Segment. A single crossing of the Bruneau River south of the CJ Strike Reservoir could avoid the need for two of the other crossings and diminish or avoid some visual impacts to the National Historic Trail. Please investigate a single crossing rather than three crossings.	Comment noted. H. R. 2104 directed the BLM to offer a ROW grant for those portions of the ROWs included in Alternative 1 that were within the SRBOP NCA prior to the legislation. Portions of the ROWs included in H.R. 2104 are not subject to change.
CA-4	9	10-4-17	NPS Pacific West Region – Lara Rozzell	3. Part of the Alternative 1 alignment passes within about three miles of the Three Island Crossing High Potential Historic Site (which itself is located within the North Trail High Potential Route Segment). Three Island Crossing is one of the most important crossings along the Oregon Trail and is highly important for maintaining trail integrity.	An analysis of the Three Island Crossing area is included in Section 3.1 and Appendix J of the FSEIS.
CA-4	10	10-4-17	NPS Pacific West Region – Lara Rozzell	4. An intact segment of the Oregon NHT, (part of the North Trail High Potential Segment) crosses Black Mesa on the south side of the river on the approach to Three Island Crossing. The Alternative 1 alignment runs parallel to the North Trail segment at distances of 1.5 to 5 miles, and is visible from almost 29 miles of the trail.	Comment noted. See the analysis of this area in Section 3.1 and Appendix J of the FSEIS.
CA-4	11	10-4-17	NPS Pacific West Region – Lara Rozzell	The BLM and Oregon NHT stakeholders worked extensively throughout project development to design low-impact siting of the transmission line to protect Congressionally designated National Historic Trail resources. The National Park Service asks that BLM and the project proponents work with stakeholders to analyze and incorporate the lower-impact alternatives and route variations into the former "Alternative 1" alternative to avoid or diminish the previously	Comment noted. H. R. 2104 directed the BLM to offer a ROW grant for the portions of the ROWs included in Alternative 1 that were within the SRBOP NCA prior to the legislation. This grant has been offered. Routes considered in the SEIS that do not connect to the offered portions would not be viable. Micrositing to reduce impacts to important resources within the ROW will be considered during final design. Minor changes to other portions of Alternative 1 can be also considered.

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				identified adverse impacts to high potential historic sites and high potential route segments of the Oregon National Historic Trail as described here. The NPS understands fully that a portion of the route within the Snake River Birds of Prey National Conservation Area (NCA) is fixed due to legislation, and sees the possibility for careful planning, siting, and impact avoidance in the portions of the route that are not legislated.	
CA-4	12	10-4-17	NPS Pacific West Region – Lara Rozzell	It is further our understanding that about nine miles of the Oregon NHT west of Three Island Crossing will be incorporated into the expanded NCA. This incorporation, which would help to protect any original remnants of the historic trail, could provide new opportunities for public interpretation and other actions to mitigate adverse impacts that this undertaking will incur to the Oregon National Historic Trail.	Comment noted.
CA-4	13	10-4-17	NPS Pacific West Region – Lara Rozzell	The proposed Land Use Plan Amendments (LUPA's) described below will generally remove or reduce Oregon Trail protections. Please analyze how removing trail protections will affect "resources, qualities, values or associated settings or the primary use or uses of the Oregon Trail." Please also describe actions "to eliminate or moderate, to the greatest extent possible, intensity and duration of the adverse impact to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses of the National Trail from incompatible multiple-use activities." Specific proposed Land Use Plan Amendments are referenced below by their Numbers assigned in Appendix F of the Final SEIS.	Please see the detailed analysis of trail impacts in Appendix J of the SEIS. Mitigation for project effects to national historic trails would be implemented in accordance legislation, regulations, Manual 6280 (see Appendix J of the FSEIS) and land management plans as amended. Historic properties would have site-specific Historic Properties Treatment Plans (HPTPs) as discussed in Section 3.1.2.4 of the 2016 FSEIS. The BLM will collaborate with cooperators, agencies and other interested parties to develop appropriate mitigation.
CA-4	14	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendment SEIS-3 to the 1987 Jarbidge RMP would remove a classification of "Utility Avoidance/Restricted Area" that was created to protect Oregon National Historic Trail ruts. How will overhead lines affect the associated setting? Even though placement of the line is overhead, ground travel will be required	Project effects on NHTs are discussed in Section 3.1 and in greater detail in Appendix J of the FSEIS. Please see Environmental protection Measures VIS-6, 7 and 11 and CR-5 and other measures in Appendix M of the SEIS. Note that the proposed plan amendment SEIS-3 states "...allow the overhead lines of a 500-kV powerline right-of-way while protecting the Oregon Trail route."

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				to install and maintain the lines. How will trail ruts be protected?	
CA-4	15	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendment SEIS-4 to the 1987 Jarbidge RMP would remove protections from incompatible uses “where visual impacts are already compromised.” Please disclose the specific locations where visual impacts are compromised and these protections would be removed, as well as the process by which compromised visual impacts were identified. Please disclose and analyze the resulting cumulative impacts to the visual resources and the trail visitors.	See the previous response. Note that SEIS-4 states: “Protect existing trail ruts from surface disturbance.”
CA-4	16	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendments SEIS-5 and SEIS-14 would modify VRM boundaries and reclassify VRM Class I areas to VRM Class III or IV areas. What “new manual” is referenced for the reclassification? What will be the impacts to the visual resources of the Oregon Trail and the visitor experience?	Affects to scenery associated with plan amendments are analyzed in Appendices F and G of the SEIS. Appendix G includes photo simulations of the areas.
CA-4	17	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendments SEIS-15 and SEIS-18 would remove the VRM II protections for the Oregon Trail for a 500-foot wide corridor. How will removal of this protection impact the Trail visual resources and the visitor experience?	These two amendments are no longer being considered. The areas that these amendments applied to are included in H. R. 2104.
CA-4	18	10-4-17	NPS Pacific West Region – Lara Rozzell	Proposed Amendment SEIS-17 would remove SRMA Oregon Trail protection for the powerline corridor. How, specifically, would the Trail be protected from surface disturbance during transmission line construction and maintenance? What will be the impacts to the visual resources of the trail and the visitor experience?	This amendment is no longer being considered. The area that this amendment applied to is included in H. R. 2104.