

**Appendix H  
Public Comments and Responses to Draft EA**

## Gateway West Environmental Assessment Public Comments and Responses to Draft EA

COMMENT					RESPONSE
Letter Number	Comment Number	Date	Author	Comment	
1	1	11/14/17	Aaron Scheff, Idaho DEQ	Thank you for the opportunity to respond to your request for comment. While DEQ does not review projects on a project-specific basis, we attempt to provide the best review of the information provided. DEQ encourages agencies to review and utilize the Idaho Environmental Guide to assist in addressing project-specific conditions that may apply. This guide can be found at <a href="http://www.deq.idaho.gov/ieg/">http://www.deq.idaho.gov/ieg/</a> .	Comment noted. The Project Proponents are responsible for meeting all State requirements. See Section 1.5.1 of the Final Supplemental Environmental Impact Statement (SEIS).
1	2	11/14/17	Aaron Scheff, Idaho DEQ	Please review IDAPA 58.01.01 for all rules on Air Quality, especially those regarding fugitive dust (58.01.01.651), trade waste burning (58.01.01.600-617), and odor control plans (58.01.01.776). For questions, contact David Luft, Air Quality Manager, at 373-0550.	Dust suppression requirements are addressed in Section 3.20 of the SEIS, and environmental protection measure (EPM) AIR-5 addresses dust. EPM FIRE-7 prohibits burning debris unless authorized by the appropriate agency.
1	3	11/14/17	Aaron Scheff, Idaho DEQ	IDAPA 58.01.01.201 requires an owner or operator of a facility to obtain an air quality permit to construct prior to the commencement of construction or modification of any facility that will be a source of air pollution in quantities above established levels. DEQ asks that cities and counties require a proposed facility to contact DEQ for an applicability determination on their proposal to ensure they remain in compliance with the rules. For questions, contact the DEQ Air Quality Permitting Hotline at 1-877-573-7648.	The Project Proponents are responsible for meeting all State requirements. See Section 1.5.1 of the SEIS.
1	4	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends verifying that there is adequate sewer to serve this project prior to approval. Please contact the sewer provider for a capacity statement, declining balance report, and willingness to serve this project.	Comment noted. The Project Proponents are responsible for coordinating with the State prior to construction.
1	5	11/14/17	Aaron Scheff, Idaho DEQ	IDAPA 58.01.16 and IDAPA 58.01.17 are the sections of Idaho rules regarding wastewater and recycled water. Please review these rules to determine whether this or future projects will require DEQ approval. IDAPA 58.01.03 is the section of Idaho rules regarding subsurface disposal of wastewater. Please review this rule to determine whether this or future projects will require permitting by the district health department. All projects for construction or modification of wastewater systems require preconstruction approval. Recycled water	Wastewater treatment is discussed in Section 3.16 of the SEIS; see the EMPs requiring permits and an approved pollution prevention plan. See Section 1.5.1 of the SEIS.

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				projects and subsurface disposal projects require separate permits as well.	
1	6	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends that projects be served by existing approved wastewater collection systems or a centralized community wastewater system whenever possible. Please contact DEQ to discuss potential for development of a community treatment system along with best management practices for communities to protect ground water.	Comment noted.
1	7	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends that cities and counties develop and use a comprehensive land use management plan, which includes the impacts of present and future wastewater management in this area. Please schedule a meeting with DEQ for further discussion and recommendations for plan development and implementation. For questions, contact Todd Crutcher, Engineering Manager, at 373-0550.	Comment noted. The Project Proponents are responsible for coordinating with the local governments prior to construction. See Section 1.5.1 of the SEIS.
1	8	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends verifying that there is adequate water to serve this project prior to approval. Please contact the water provider for a capacity statement, declining balance report, and willingness to serve this project.	Comment noted. The Project Proponents are responsible for meeting State requirements prior to construction. See Section 1.5.1 of the SEIS.
1	9	11/14/17	Aaron Scheff, Idaho DEQ	IDAPA 58.01.08 is the section of Idaho rules regarding public drinking water systems. Please review these rules to determine whether this or future projects will require DEQ approval. All projects for construction or modification of public drinking water systems require preconstruction approval.	The Project does not involve building public drinking water systems.
1	10	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends verifying if the current and/or proposed drinking water system is a regulated public drinking water system (refer to the DEQ website at <a href="http://www.deq.idaho.gov/water-quality/drinking-water.aspx">http://www.deq.idaho.gov/water-quality/drinking-water.aspx</a> ). For non-regulated systems, DEQ recommends annual testing for total coliform bacteria, nitrate, and nitrite.	The Project does not involve building public drinking water systems.
1	11	11/14/17	Aaron Scheff, Idaho DEQ	If any private wells will be included in this project, we recommend that they be tested for total coliform bacteria, nitrate, and nitrite prior to use and retested annually thereafter.	Comment noted.

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1	12	11/14/17	Aaron Scheff, Idaho DEQ	<input type="checkbox"/> DEQ recommends using an existing drinking water system whenever possible or construction of a new community drinking water system. Please contact DEQ to discuss this project and to explore options to both best serve the future residents of this development and provide for protection of ground water resources..	Comment noted.
1	13	11/14/17	Aaron Scheff, Idaho DEQ	DEQ recommends cities and counties develop and use a comprehensive land use management plan which addresses the present and future needs of this area for adequate, safe, and sustainable drinking water. Please schedule a meeting with DEQ for further discussion and recommendations for plan development and implementation. For questions, contact Todd Crutcher, Engineering Manager at 373-0550.	Comment noted.
1	14	11/14/17	Aaron Scheff, Idaho DEQ	A DEQ short-term activity exemption (STAE) from this office is required if the project will involve de-watering of ground water during excavation and discharge back into surface water, including a description of the water treatment from this process to prevent excessive sediment and turbidity from entering surface water.	Comment noted.
1	15	11/14/17	Aaron Scheff, Idaho DEQ	Please contact DEQ to determine whether this project will require a National Pollution Discharge Elimination System (NPDES) Permit. If this project disturbs more than one acre, a stormwater permit from EPA may be required.	Comment noted. See WQA-1 through WQA-3 in the 2017 Gateway West Record of Decision (ROD).
1	16	11/14/17	Aaron Scheff, Idaho DEQ	If this project is near a source of surface water, DEQ requests that projects incorporate construction best management practices (BMPs) to assist in the protection of Idaho's water resources. Additionally, please contact DEQ to identify BMP alternatives and to determine whether this project is in an area with Total Maximum Daily Load stormwater permit conditions.	Best management practices are required by the 2017 Gateway West ROD. See the applicable EPMS in the appendix to the ROD.
1	17	11/14/17	Aaron Scheff, Idaho DEQ	The Idaho Stream Channel Protection Act requires a permit for most stream channel alterations. Please contact the Idaho Department of Water Resources (IDWR), Western Regional Office, at 2735 Airport Way, Boise, or call 208-334-2190 for more information. Information is also available on the IDWR website at:	The Project Proponents are responsible for meeting all State requirements. See Section 1.5.1 of the SEIS.

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				<a href="http://www.idwr.idaho.gov/WaterManagement/StreamsDams/Streams/AlterationPermit/AlterationPermit.htm">http://www.idwr.idaho.gov/WaterManagement/StreamsDams/Streams/AlterationPermit/AlterationPermit.htm</a>	
1	18	11/14/17	Aaron Scheff, Idaho DEQ	The Federal Clean Water Act requires a permit for filling or dredging in waters of the United States. Please contact the US Army Corps of Engineers, Boise Field Office, at 10095 Emerald Street, Boise, or call 208-345-2155 for more information regarding permits. For questions, contact Lance Holloway, Surface Water Manager, at 373-0550.	Comment noted. The U.S. Army Corps of Engineers is a cooperating agency on the Gateway West Project and is responsible for issuing this permit.
1	19	11/14/17	Aaron Scheff, Idaho DEQ	Hazardous Waste. The types and number of requirements that must be complied with under the federal Resource Conservations and Recovery Act (RCRA) and the Idaho Rules and Standards for Hazardous Waste (IDAPA 58.01.05) are based on the quantity and type of waste generated. Every business in Idaho is required to track the volume of waste generated, determine whether each type of waste is hazardous, and ensure that all wastes are properly disposed of according to federal, state, and local requirements.	The Proponents are required to comply with the approved Hazardous Materials Management Plan. See Appendix P in the 2017 ROD.
1	20	11/14/17	Aaron Scheff, Idaho DEQ	No trash or other solid waste shall be buried, burned, or otherwise disposed of at the project site. These disposal methods are regulated by various state regulations including Idaho's Solid Waste Management Regulations and Standards, Rules and Regulations for Hazardous Waste, and Rules and Regulations for the Prevention of Air Pollution.	Comment noted.
1	21	11/14/17	Aaron Scheff, Idaho DEQ	Water Quality Standards. Site activities must comply with the Idaho Water Quality Standards (IDAPA 58.01.02) regarding hazardous and deleterious-materials storage, disposal, or accumulation adjacent to or in the immediate vicinity of state waters (IDAPA 58.01.02.800); and the cleanup and reporting of oil-filled electrical equipment (IDAPA 58.01.02.849); hazardous materials (IDAPA 58.01.02.850); and used-oil a Petroleum releases must be reported to DEQ in accordance with IDAPA 58.01.02.851.01 and 04. Hazardous material releases to state waters, or to land such that there is likelihood that it will enter state waters, must be reported to DEQ in	The Project Proponents are responsible for complying with State requirements. See Section 1.5.1 of the SEIS. See EPMs WQA-30 through WQA-43 for measures that apply to spill response.

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				accordance with IDAPA 58.01.02.850.nd petroleum releases (IDAPA 58.01.02.851 and 852).	
1	22	11/14/17	Aaron Scheff, Idaho DEQ	Ground Water Contamination. DEQ requests that this project comply with Idaho's Ground Water Quality Rules (IDAPA 58.01.11), which states that "No person shall cause or allow the release, spilling, leaking, emission, discharge, escape, leaching, or disposal of a contaminant into the environment in a manner that causes a ground water quality standard to be exceeded, injures a beneficial use of ground water, or is not in accordance with a permit, consent order or applicable best management practice, best available method or best practical method." For questions, contact Albert Crawshaw, Waste & Remediation Manager, at 373-0550.	The Project Proponents are responsible for complying with State requirements. See Section 1.5.1 of the SEIS.
1	23	11/14/17	Aaron Scheff, Idaho DEQ	If an underground storage tank (UST) or an aboveground storage tank (AST) is identified at the site, the site should be evaluated to determine whether the UST is regulated by DEQ. EPA regulates ASTs. UST and AST sites should be assessed to determine whether there is potential soil and ground water contamination. Please call DEQ at 373-0550, or visit the DEQ website ( <a href="http://www.deq.idaho.gov/waste-mgmt-remediation/storage-tanks.aspx">http://www.deq.idaho.gov/waste-mgmt-remediation/storage-tanks.aspx</a> ) for assistance.	Comment noted.
1	24	11/14/17	Aaron Scheff, Idaho DEQ	If applicable to this project, DEQ recommends that BMPs be implemented for any of the following conditions: wash water from cleaning vehicles, fertilizers and pesticides, animal facilities, composted waste, and ponds. Please contact DEQ for more information on any of these conditions.	The Project includes BMPs for affected resources. Please see Appendix Z to the Plan of Development in the 2017 ROD.
1	25	11/14/17	Aaron Scheff, Idaho DEQ	We look forward to working with you in a proactive manner to address potential environmental impacts that may be within our regulatory authority. If you have any questions, please contact me, or any our technical staff at 208-373-0550.	Comment noted.
2	1	11/29/17	Katie Fite, Wildlands Defense	The rubberstamp EA is greatly inadequate. The rubberstamp nature is shown by the lack of any substantive any action or any effect on the environment in the EA. There is no updated scientific, site-specific or other information as the EA merely refers back to the stale	The EA tiers to the recently completed SEIS and 2017 ROD which presented a detailed evaluation of a several alternatives and their effects. As documented in the Chapter 2 of the SEIS, the BLM considered more than 50 routes for Segments 8 and 9, including more than 20

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				FEIS that is typically based on biological and other baseline information that is several years old now.	considered by the Resource Advisory Committee (RAC).
2	2	11/29/17	Katie Fite, Wildlands Defense	<p>The EA states: “Congress passed the Consolidated Appropriations Act, 2017 (House Resolution [H.R.] 244), which incorporated the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act (Modification Act) by reference [Division G, Title IV, Sec. 431(a)]. President Donald Trump signed the Appropriations Act into law on May 5, 2017. The Modification Act (see Appendix D) 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, which represent the portions of the Proposed Action from the Final SEIS within the boundaries of the NCA. Specifically, the Modification Act stated that the ROW grant “.</p> <p>So ROWs have only been issued for lands within the NCA, and not lands that lie outside. Changes OUTSIDE the NCA must be fully considered.</p>	This is correct; a ROW grant was issued for the Segment 8 and 9 routes through the NCA as required by H.R. 244, but not lands that lie outside the NCA.
2	3	11/29/17	Katie Fite, Wildlands Defense	Does the Act really mandate where the line would be located the entirety of segments 8 and 9? We continue to contend that the actions of the FEIS do not conform with existing Land Use Plans (including once amended). We incorporate into these comments by reference our Appeal, Protest and comments that have already been submitted in this matter.	H.R. 244 approved the two routes across the NCA. Logically, this means that the lines from the Midpoint and Cedar Hill substations need to connect with the approved routes within the NCA. The SEIS considered over 50 alternatives between the substations. No new routes connecting the substations via the approved routes across the NCA were identified during scoping. Your Appeal, Protest, and other comments are part of the Project record for this Project.
2	4	11/29/17	Katie Fite, Wildlands Defense	There is a need for new and expanded mitigation to compensate for harmful elements of the project, its wildlife habitat, the project’s harmful climate change footprint, impacts to SRBOPA and the Salmon Falls River ACEC and setting, slickspot peppergrass habitat, migratory birds and other avian species, native raptors and other sensitive species, historic trails and other very important values of the public lands.	Appendix M of the SEIS includes over 300 environmental protection measures. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the Final Environmental Impact Statement (FEIS) and the SEIS. In addition, see Appendix K, the BLM’s mitigation framework for residual impacts within the NCA.

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2	5	11/29/17	Katie Fite, Wildlands Defense	We continue to contend that there is no need for the project, and many alternatives exist. As each year goes by and the Western U. S. energy landscape changes, the lack of need for these immense destructive high voltage transmission lines, and the out-dated nature of this very expensive project, becomes ever more apparent.	Comment noted. The BLM does not have the expertise or authority to determine the need (or lack of need thereof) for upgrading the electrical grid. The purpose of this analysis, as stated in Chapter 1 of the SEIS, is to respond to an application from the Proponents for a ROW grant across public lands.
2	6	11/29/17	Katie Fite, Wildlands Defense	The EA does not adequately lay out and assess the impacts of the amendments to the Bruneau-Kuna , Bennett Hills, Jarbidge and SRBOPA LUPs. There are seven amendments to three LUPs, and a confusing discussion of these circumstances in the EA for several pages. There is also NO REASON that BLM could not amend (or analyze alternatives amending) the affected Land Use Plans to update vital protections for sensitive species, migratory birds, historic Trails, SRBOPA values, etc. as additional mitigation - especially since climate change, grazing and other threats are not addressed in any meaningful manner. This would best reflect a current inventory of the public lands and management to protect public values and the environment.	The amendments and their effects are addressed in detail in Appendices F and G of the SEIS.
2	7	11/29/17	Katie Fite, Wildlands Defense	In the Kuna LUP, the Plan lies outside existing corridors. BH/T amendments would allow line in much too close proximity to cultural sites. The 1987 Jarbidge RMP would be amended to change VRM II to III. Only very limited areas were protected by VRM protections at a II level in these old LUPs. There have been massive habitat, viewshed and other changes in the lands of the old LUPs since the plans were adopted. This means that VRM II lands have become more rare, and/or are besieged with threats and intrusions. So the damage to visual resources and OTHER resources any of these attributes from the project is now in a 2017 context much more significant. The cumulative effects over time of all the deterioration of the environment have not been assessed. The cumulative effect over time of wildfire and weed expansion in the sagebrush ecosystem since the old LUPs were adopted has never been properly assessed.	Comment noted. Please refer to the analysis of impacts to the visual resource in Appendix G of the SEIS.
2	8	11/29/17	Katie Fite, Wildlands Defense	The plans are not a current inventory of the lands. An EIS is necessary to take a hard look at just how significant the amendments are in a 2017 context. How much relatively	Impacts to trails, including changes to the visual setting, are discussed in Section 3.1 of the SEIS and in greater

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				untrammelled VRM II land will be present in the areas of trails or other resources, for example? How much higher quality sagebrush habitat remains now vs. was present in the late 1980s? Moreover, the cumulative effects of the amendments that have already been made – for example to Trails and sensitive species must also be fully examined.	detail in Appendix J to the SEIS. Also see Appendices F and G to that document.
2	9	11/29/17	Katie Fite, Wildlands Defense	BLM states: “The BLM selected the route pairing identified in the Final SEIS as Alternative 5 (Route 8G and Route 9K) in the January Decision. The January 19, 2017, ROD approved one amendment to the Bruneau MFP, two amendments to the Twin Falls MFP, and one amendment to the Snake River Birds of Prey RMP needed to grant a ROW for Alternative 5. These plan amendments remain in effect. However, the alignment pairing in this alternative does not align with the ROW the BLM offered pursuant to the Modification Act”. WHY do these Plan amendments remain in effect?	The 2017 ROD contained two decisions, one of which approved the multiple plan amendments. These amendments became a permanent addition to the governing Land Use Plan(s). The BLM elected not to include the removal of the 2017 amendments in this planning exercise. Additional changes to the Plan(s) in the future, including removal of the 2017 amendments, would require another complete Land Use Planning process, with public scoping, comment periods, notifications, and Decision.
2	10	11/29/17	Katie Fite, Wildlands Defense	The Simpson Bill does not alleviate the need to conduct a current and adequate direct, indirect and cumulative effects analysis. WLD carries forward all our comments, protest and appeal points regarding the inadequacies of the EISs used to date in this prolonged, segmented Gateway process, as well as those submitted for the interconnected and linked B2H Idaho Power project largely in Oregon.	A detailed analysis of the direct, indirect, and cumulative effects attributed to implementing Alternative 1 in the Final SEIS is incorporated by reference in this Environmental Assessment, and comments at this time should be specific to the analysis of this Alternative. WLD did not protest the 2017 Land Use Plan amendment Decision, but did appeal the ROW Decision. That appeal was denied when the IBLA set aside and remanded the ROW Decision to the BLM for further consideration in April 2017.
2	11	11/29/17	Katie Fite, Wildlands Defense	BLM hides behind “tiering” to cover up for the appalling lack of analysis in the EA: “The analysis in this EA addresses only the portions of the Project related to Segments 8 and 9. Tiering (40 CFR 1508.28) uses the analysis in broader EIS documents to narrow the range of alternatives and concentrate on the issues not already addressed. This EA incorporates by reference and tiers to the analysis found in the 2013 Final EIS and 2016 Final SEIS regarding Project-wide impacts. It also incorporates by reference the 2017 Modification Act in its entirety ...”.	The EA tiers to the FEIS and SEIS, which is appropriate. See 40 CFR Part 1502-20: “Agencies are encouraged to tier to environmental impact statements to eliminate repetitive discussions of the same issues...” The issues identified during scoping are similar to issues considered in the FEIS and SEIS.

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2	12	11/29/17	Katie Fite, Wildlands Defense	The EA fails to effectively assess, minimize and mitigate both the impacts of reducing the NCA boundary on SRBOPA ecological, historical, cultural and other values and the public interest, and the discordancy with the Jan 2017 SEIS referenced here:	The routes across the NCA were approved by H.R. 244 and are not subject to revision in this EA.
2	13	11/29/17	Katie Fite, Wildlands Defense	The EA takes a minimal and glancing look at only three alternatives – proposed action, no action and no development. The EA greatly fails to assess and take a hard look at the very important values of No Action alternative regarding everything from the out-moded dinosaur nature of this very expensive project to its adverse impacts on native biota, historical trails and other substantial values of the affected public lands. There are no alternative mitigation alternatives, or no consideration of more protective ROW terms, BMPs, mitigation or other actions. Elements of alternatives that may better mitigate the adverse effects of the project and minimize its tremendous environmental harms are not expanded on from the very deficient minimal mitigation and minimization of the previous EISs.	The SEIS considered over 50 alternatives for Segments 8 and 9. No new alternatives were identified in scoping. The SEIS considered the Proponents' Mitigation and Enhancement Portfolio (SEIS Appendix C) and the BLM's alternative Mitigation Framework (SEIS Appendix K). The BLM will consider mitigation requirements based on direction in the applicable legislation, BLM regulations, and land management plans.
2	14	11/29/17	Katie Fite, Wildlands Defense	The proponent has never adequately identified WHERE energy transported by the line will come from, and go to, and linked or foreseeable private sector, military, INL or other projects. Thus, there is no basis or substance to the claim that if some segments or portions are built and not others, there will be harm to the company. Idaho Power has not demonstrated why this line needs to connect with the highly controversial B2H project, either.	Comment noted. Idaho Power's objectives are presented in Section 1.4.1.2 of the SEIS.
2	15	11/29/17	Katie Fite, Wildlands Defense	Certainty there are numerous ways in which mitigation and protection requirements can be strengthened – ranging from Land Use Plan amendments to require protection of species from adverse environmental effects, providing species with more guaranteed acres of restored habitat, and many other actions. There is also ample room for alternatives evaluating expanded protection and mitigation actions. This includes consideration of all of the following: <ul style="list-style-type: none"> <li>• Avoiding the impact altogether by not taking a certain action or parts of an action.</li> </ul>	Comment noted. Appendix M of the SEIS includes over 300 of EPMs designed to meet these objectives. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the FEIS and the SEIS. In addition, see Appendix K, the BLM's mitigation framework for residual impacts within the NCA.

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				<ul style="list-style-type: none"> <li>• Minimizing impact by limiting the degree of magnitude of the action and its implementation.</li> <li>• Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.</li> <li>• Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.</li> <li>• Compensating for the impact by replacing or providing substitute resources or environments.</li> </ul>	
2	16	11/29/17	Katie Fite, Wildlands Defense	<p>For example, avoiding impacts during construction, for example by not building more roads can be attained by use of helicopters to carry materials. Expanded rectification actions can be analyzed in alternatives and required in the EA ROD. Another example is marking the line throughout its length with avian flight diverters, or acquisition of parcels of land for compensation of species harms inflicted by the lethal habitat destroying line. Acquisitions could provide for nesting or other habitat to mitigate the line effects. Purchase and retirement of grazing permits can be used to better ensure rehab actions are effective and to provide higher quality undisturbed nesting or other habitats, and an improved more diverse prey base for sensitive raptors or other wildlife. This is also necessary to compensate for the threat posed by the Soda fire destruction of sagebrush habitats and the threat it poses to local and regional populations of sensitive species. It is also necessary due to the BLM's intensified damaging habitat actions such as imposition of scorched earth "fuelbreaks" to be grazed to dustbowl status by livestock in the wake of the Soda Fire.</p>	Please see the response to the previous comment.
2	17	11/29/17	Katie Fite, Wildlands Defense	<p>Additional protections and mitigation actions are also necessary due to the worsening environmental conditions and the gutting and weakening of environmental regulations and oversight that Int. Sec. Zinke is imposing on public lands. This greatly increases uncertainty associated with the entire segmented Gateway and b2H projects, and the minimal, loose worded, uncertain BMPs. SOPS, mitigation and so-called "minimization".</p>	Comment noted.

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2	18	11/29/17	Katie Fite, Wildlands Defense	<p>While the Legislation constrained the location in the SRBOPA, other areas are not constrained, and BLM should consider alternatives that also:</p> <ul style="list-style-type: none"> <li>- Co-locate this line with existing lines to the maximum extent possible combined with upgrading existing line segments to a Double Circuit new transmission.</li> <li>- Locate this line along the I-84 corridor to the maximum extent possible.</li> <li>- A combination of co-location and paralleling the I-84 corridor, and burying significant portions of line segments.</li> </ul>	<p>As stated in Section 2.4.of the Gateway West FEIS, the original objective for routing was to follow existing utility ROWs and designated corridors where feasible. The majority of Alternative A follows existing lines. Routes that followed I-84 to the extent possible were considered; see I-85 North Route and I-84 North Variation Route in Section 2.5.3.1 of the SEIS.</p>
2	19	11/29/17	Katie Fite, Wildlands Defense	<p>The EIS process made vague, uncertain and unsupported references to “technical considerations” and other statements to avoid and deflect analysis of alternative paths. This continues in the EA Comment response where concerned residents are ignored in the Hemingway area, as Idaho Power insists on running the line over top their homes rather than making reasonable routing changes.</p>	<p>The BLM recognizes residents’ concerns 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 SEIS for a discussion of noise effects.</p>
2	20	11/29/17	Katie Fite, Wildlands Defense	<p>Even the most basic of studies and analysis necessary to understand the line’s adverse footprint on avian migration corridors or high use areas has been ignored by Idaho Power throughout this decade long process. Minimization and mitigation have been ignored. Marking the line throughout the length in important avian use areas has been abjectly ignored. This is serious concern given the project’s proximity to the Snake River and its slashing through the SRBOPA area. Raptors, waterfowl, migratory</p>	<p>Bird mortality, including birds covered by the MBTA, is analyzed in Sections 3.10 and 3.11 of the FEIS and SEIS. Also see Section 5.2.3 of the 2017 ROD for a discussion of how the Project would comply with the MBTA. Bird collisions are addressed in Section 3.10 of the FEIS and SEIS. Also see the analysis in Chapter 4 of both the FEIS and SEIS, which discloses the cumulative effects associated with the transmission line and other past, present, and foreseeable future activities.</p>

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				songbirds including sensitive species are left highly vulnerable to injury and death from collisions with this line.	
2	21	11/29/17	Katie Fite, Wildlands Defense	There is not even study and analysis of estimate of how many birds are killed or injured from the existing lines in the area, so that the added toll of Gateway and B2H can be placed in perspective and effects understood. In Idaho Power's view, it appears ignorance is bliss when it comes to avian mortality from its huge increasingly obsolete long distance transmission lines that will pose serious threats in many areas near rivers or other attractive features for resident and migratory avian species.	The area between towers and underneath the conductor wires would not be cleared unless an access road is proposed. Therefore, direct loss of habitat is addressed for surface disturbance specifically at tower locations, access roads, temporary construction sites, and off-site ancillary facilities. Areas of the ROW spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for this Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	22	11/29/17	Katie Fite, Wildlands Defense	The harmful crossing of Salmon Falls Creek in the area of the wildlife rich WSR and WSA has never been effectively addressed and harm mitigated and minimized. BLM must use this current process to correct its improperly mitigated actions authorized in the EISs. This matter is made more urgent due to current knowledge about declines in avian species numbers and populations, which is not adequately addressed in this rubberstamp EA. The EA must also consider an alternative alignment to the north.	A transmission line is consistent with a Recreation River designation. 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 SEIS).
2	23	11/29/17	Katie Fite, Wildlands Defense	The EA Table 3.1 Affected Environment is plagued with all the previous EIS problems. Distances surveyed and assessed for impacts of the line itself and the access roads are much too small/narrow. Roads are often devoid of controls and concerns, with "NA" applied for many resources. For cultural resources there is no info provided. The Socioeconomic analysis lacks valuation of elements of the environment adversely impacted and/or destroyed by the project. Veg distance is much too narrow- 250 ft line, 13 ft road. Weeds, dust, herbicide drift, etc. all will extend much further.  Sensitive plant distances are appallingly meager – 0.5 mi. and .25 mi. Yet weeds and soil erosion can cause adverse effects permanently much further distant – from smothering microbiotic crusts to herbicide drift on	Comment noted. The measures used in the analysis are disclosed on each applicable section of Chapter 3 of the FEIS. They are typical measures used in analyses of projects of this scale and scope. The analysis recognizes that roads have impacts. Adverse effects are disclosed in Chapter 3 of the FEIS and SEIS. The need for new roads is reduced where the new lines follow existing lines. Mitigation measures are included to avoid, reduce, or mitigate these adverse effects; however, the FEIS and SEIS disclose that there will be higher risks of adverse impacts.

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				windblown soils –as occurred in the BLM’s infamous Oust incident in eastern Idaho. Plateau, the chemical now in vogue as an Oust replacement, often kills off native vegetation. For invasive plants, roads are listed as NA, ignoring the body of scientific literature that demonstrates roads are weed corridors. For “general” fish and wildlife, road distances are a mere .5 miles. Yet roads are conduits for weed invasion. They fragment wildlife habitats, and increase human disturbance. The bared area may be used travel corridors for mammalian predators and fragment habitats and populations. The same concerns apply to sensitive species, where distances are minimal. There isalso increased human disturbance along roads – and ij areas of the SRBOPA and the southern Idaho area in general use is also likely to include target shooting, varmint hunting, and other activities that may harm species of concern.	
2	24	11/29/17	Katie Fite, Wildlands Defense	Paleo resources are largely ignored, despite proximity of Hagerman Fossil Beds and several known fossil sites. General hazards seems much too small an area. There is no analysis of the foreseeable effects of Oil and Gas potential and ultimate development causing sleeping faults to become active, and trigger earthquakes and geologic instability. Soils distances are too small especially given the erosive nature of soils and the prolonged dry periods resulting in dust and windblown soil erosion of disturbed sites. It is inexplicable why roads are not addressed here. Land use and recreation distances are also utterly minimal. Further, how could the ugly highly unnatural line cutting across the landscape only impact recreational uses and enjoyment within .25 miles? Air quality is not adequately assessed here, nor is the total pollution footprint. The line will be visible for several miles. We can not understand how Idaho Power can get away with such minimal consideration of environmental effects of all of its project disturbances – from the line itself top construction sites to access routes.	Paleo resources are analyzed and both potential effects and measures to avoid and or reduce effects are disclosed in Section 3.3.13 of the SEIS, geologic hazards in Section 3.14, and soils in Section 3.15. Dust suppression measures are discussed in Section.3.20, Air Quality. The FEIS and SEIS include analysis of visual resource impacts in Section 3.2. Also see the detailed analysis, including photo simulations, in Appendices G, E, and J.
2	25	11/29/17	Katie Fite, Wildlands Defense	EA Table 3.1 type of generic one size fits all analysis woefully ignores the unique attributes of resources	Comment noted.

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				impacted or destroyed by the line along the segment route.	
2	26	11/29/17	Katie Fite, Wildlands Defense	For SRBOPA, raptors, upland, upland habitat/veg, cultural, national historic trails, and recreation are listed. The project will affect different raptor species in very different ways. For example, effects on burrowing owl vs. effects on redtail hawks. AND the effects will vary depending on quality and quantity of seasonal habitat in the area of the line proximity of vital seasonal use areas, presence or absence of nesting pairs of birds in proximity, etc. Outside the SRBOPA, in areas where sage-grouse are a concern, the analysis has likewise been minimal and self-serving.	Effects on individual raptors species do differ as the comment states. Effects on raptor species impacted by the Project, as well as on their habitats, are disclosed in various tables in Appendix D of the FEIS and the SEIS. Also see the analyses in Sections 3.10 and 3.11 of the FEIS.
2	27	11/29/17	Katie Fite, Wildlands Defense	The EA very frequently uses wording like “could” impact. It never reveals specific locations and ways in which public land environmental values would actually be impacted, or destroyed, and how irreparable the impact of the line may be.	Since an FEIS and an EA are not decision documents, any effect is conditioned on a project being approved and on the final design. Many impacts could be avoided by proper placement of towers and roads; therefore, some effects cannot be known with certainty until a route is approved; all federal, state, and local permits are issued; and the final design is completed.
2	28	11/29/17	Katie Fite, Wildlands Defense	The EA (and all the stack of EIS documents) fails to address the role of grazing in negating the hoped for effectiveness of the EIS’s restoration promises, such as: “To minimize direct and indirect effects of vegetation removal under each alternative, the Proponents have proposed a Framework Reclamation Plan in the Plan of Development (POD) (Appendix B of Final EIS) that provides procedures for pre-construction treatment of noxious weeds and invasive plants, weed prevention and control, topsoil treatment, ROW restoration, stabilization of disturbed areas to minimize erosion and runoff, seedbed preparation, seeding methods, preliminary seed mixes, road reclamation, monitoring, and remedial actions ...”. What happens when the cows eat up and trample the “rehab”, and weeds invade?	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. The decision to allow grazing following construction would be based on site-specific conditions.
2	29	11/29/17	Katie Fite, Wildlands Defense	Moreover, along and near lengths of the ROW, BLM is proposing increased grazing use (as in the case of the U2 and Loughmiller allotments). There is no analysis of BLM re-authorization of grazing permits that contain AUM numbers dramatically in excess of current actual use.	See the response to the previous comment.

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				Burley BLM in the Berger Tracts area near salmon falls Creek just authorized an EA that will destroy sagebrush and rabbitbrush to placate ranchers who have grazed the land to dirt in many places. This, and similar actions from BLM offices across the length of the line illustrate the ongoing LOSS of sagebrush habitat, and Dark Ages style BLM management that is taking hold again. There is no analysis of the severe scorched earth disturbance from the Owyhee BLM Soda Fuelbreaks, or other agency scorched earth fuelbreak and/or grazing schemes that result from non-stop political pressures on BLM to perpetuate or expand high levels of grazing use.	
2	30	11/29/17	Katie Fite, Wildlands Defense	There is no adequate analysis and mitigation for adverse impacts to slickspot peppergrass (LEPA). We are greatly concerned at the potential for the construction and other activity associated with this project to expand forage kochia, which is known to invade and smother slickspots, along with other weeds likely to do the same. Windblown tumbleweeds from project disturbance are also highly likely to choke slickspots, and other rare plant habitat and playas, including <i>Lepidium davisii</i> sites. Ad of course, none of these locations is properly identified in mapping and other information so that the full scope of the projects' impact on the site, local, and regional populations can be adequately understood. They are also likely to clog fences, and block antelope and other species passage in places. Just as with all other environmental attributes, LEPA is given minimal consideration.	Slickspot peppergrass is addressed in Section 3.8 of the SEIS. Also see the USFWS Biological Opinion/Conference Opinion including supplemental memoranda on ESA-listed species.
2	31	11/29/17	Katie Fite, Wildlands Defense	This is despite the EA acknowledging that: "Slickspot peppergrass was reinstated as a threatened species on September 16, 2016, which was subsequent to the completion of the 2013 Biological Assessment (BA). We have determined that implementation of the Proposed Action for Segments 8 and 9 of the 2017 EA "may effect", and is "likely to adversely affect" slickspot peppergrass in a manner or to an extent similar to that which was analyzed in the original 2013 BA and for which the Service provided its 2013 Conference Opinion (CO). The BLM has requested U.S. Fish and Wildlife Service (USFWS) acknowledgement of this "may effect, likely to adversely	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:  2.10 Reinitiation Notice  <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</i>

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				affect” determination for slickspot peppergrass and its proposed critical habitat for the Proposed Action and further request USFWS confirm the conclusion of the 2013 CO as formal consultation and as the USFWS’s Biological Opinion”. How have conditions of occupied LEPA habitats changed since 2013? What areas have burned in fires or suffered other damage? What does monitoring show? How many “A” sites remain, and where? What is the proximity of sites of each Habitat category to the line route? Will the line jeopardize any occupied slickspots? The minimal provisions of the EA do not comport with recovery of the species.	<i>incidental “take” as described below are not applicable to listed plants, including slickspot peppergrass.</i>
2	32	11/29/17	Katie Fite, Wildlands Defense	There are myriad adverse effects to both rare plants and animals. These include heightened fire danger and risk from the construction and operation of the line (which are not adequately assessed, minimized and mitigated) in the EIS and EA.	Effects to special status plants are discussed in Section 3.7 of the FEIS and SEIS.
2	33	11/29/17	Katie Fite, Wildlands Defense	The EIS fails to provide detailed mapping and analysis that showed the location of LEPA and its habitats to all aspects of the project development and operation. This must be rectified.	Figure E.7-2 in Appendix E of the SEIS shows where the transmission line routes cross slickspot peppergrass habitat. The BLM typically avoids identifying the exact location of listed species in a NEPA document in order to protect individuals from collection or other harm. Please see TESPL-3 and TESPL-4 for survey, protection, and monitoring requirements.
2	34	11/29/17	Katie Fite, Wildlands Defense	Pollinators are significantly threatened by increased exotic weed invasion potential. Where does the line come within 2 miles of LEPA pollinator habitat and slickspots? How will project disturbance potentially expand harvester ants, which are LEPA seed predators? These ants thrive on disturbance, and grazing disturbance is also highly likely to worsen harvester ant problems.	See the USFWS Biological Opinion and Section 3.7 in the SEIS for Project effects on slickspot peppergrass. Also see Figure E.7-2 in Appendix E of the SEIS for a map showing where the transmission line routes cross slickspot peppergrass habitat. TESPL-4 requires a buffer around all slickspot peppergrass plants, slickspot peppergrass habitat, and areas classified as occupied by slickspot peppergrass. See Section 3.8 of the SEIS for measures proposed to prevent invasive plants from spreading in the project area.  Harvester ants are associated with disturbance, primarily due to the loss of shrubs (sagebrush, rabbitbrush, Atriplex, etc.). Harvester ants tend to avoid areas with taller, more structurally diverse habitat like those found in intact shrublands. It is true that harvester ants have been found to be highly effective LEPA seed

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					predators. However, they mostly forage on Sandberg's bluegrass ( <i>Poa secunda</i> ) seeds as they are the most abundant, readily available seed source in the area. Harvester ants and bluegrass are ruderal species and therefore co-occur frequently. In addition, harvester ants appear to avoid cheatgrass monocultures because the seeds are large and difficult to handle. Although expansion of harvester ants is possible from initial habitat disturbance, the BLM intends to restore shrubland structure to impacted habitat as outlined in Appendix K, thereby curtailing harvester ant expansion and mitigating impacts in the mid- to long-term through these restoration efforts.
2	35	11/29/17	Katie Fite, Wildlands Defense	There are serious ongoing threats to LEPA in the project area – including military training activity and fires, and very very harmful periods and manner of livestock grazing use disturbance that is chronically inflicted. This includes winter and spring grazing when soils are very moist and trampling damage is high. The cleared line path will make it much easier for livestock to trail; along the line to access and trample slickspots that previously may have received less disturbance. The EISs and this EA greatly fail to address, minimize and mitigate the serious conflicts and threats that grazing poses to native biota, and the extent to which it will hinder project rehab. Without proper assessment of the welter of grazing, livestock facility water hauling, military training activity or other threats this and other imperiled and sensitive species face, BLM can not ensure proper minimization and mitigation of project effects. There is no hard look at grazing impacts on the SRBOPA and all other areas of the Gateway affected landscape.	Cumulative effects to slickspot peppergrass are addressed in Chapter 4 of the FEIS and SEIS.
2	36	11/29/17	Katie Fite, Wildlands Defense	Throughout its supposed “analysis”, BLM falls back on the old and minimal EIS measures repeating time after time: “No additional effects would occur from the Proposed Action and no RMP amendments would be required in addition to the ones identified in the Final EIS and Final SEIS ...”.Examples 3.3.10, 11, etc.	Comment noted. The EA makes these statements when no additional effects have been identified.

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2	37	11/29/17	Katie Fite, Wildlands Defense	The EA states: "The amendment changing the VRM Class II classification to VRM Class III would change the classification of lands within 3,000 feet of an existing transmission line. This may result in up to two additional transmission lines being located along this route, which would result in additional impacts to resources managed under the MFP. The cumulative effect of the plan amendment would not differ substantially from the effect of the Project itself, particularly given that no projects other than possible future transmission lines are proposed for the area. In addition, to allow the crossing of the Oregon NHT .the amendment (SEIS-10)". What are these other transmission lines, and what are their foreseeable adverse effects? Is this related to the Cat Creek Energy Project or some other project? WHAT additional lines are in the works? This demonstrates the perils and high significance of such amendments. The Plan must be amended ONLY for this project, with no future amendments allowed. This kind of thing represents large-scale new industrialization of the area.	The SEIS does not state that two additional lines will be placed in this location, only that there would be space for two. The BLM is not aware of proposals to add lines in this area; therefore, no lines could be identified. The Cat Creek project is not far enough along to be considered a foreseeable action. The Bureau of Reclamation sent a letter to Cat Creek in March of 2017 stating "Reclamation is concerned that Cat Creek does not understand the LOPP process, current status, or a realistic timeline, especially given that little progress has been made since Reclamation notified Cat Creek of its selection as preliminary lessee by letter dated October 17, 2016." Reclamation further states: "Reclamation's October 17, 2016 letter to Cat Creek does not authorize Cat Creek to use water from Anderson Ranch Reservoir or to begin construction activities."
2	38	11/29/17	Katie Fite, Wildlands Defense	The EA utterly minimizes the adverse impacts of its amendment. "Allowing land-disturbing developments up to 330 feet from the Oregon NHT could potentially affect the ability to conform to agency policy of protecting archaeological sites; however, stipulations for managing archeological sites as required by the National Historic Preservation Act (NHPA) should minimize this possibility. Additionally, EPMS (CR-1 through CR-8) as stated in Appendix M of the Final SEIS would be aimed at reducing these impacts, and construction would occur in a manner that would avoid disturbing important historic resources. Idaho Power could be made to bury/underbore the line, and this must be fully considered as an alternative.	Comment noted. Effects to the Oregon NHT are analyzed in Section 3.1 of the SEIS and in greater detail in Appendix M to that document. Undergrounding the line is discussed in Section 2.6.3 of the FEIS. As the photos demonstrate, placing a transmission line underground requires much greater ground disturbance than constructing an aboveground line.
2	39	11/29/17	Katie Fite, Wildlands Defense	The Kuna amendment facilitates energy sprawl, with no proper mitigation – such as placing areas off limits to energy activity.	Comment noted.
2	40	11/29/17	Katie Fite, Wildlands Defense	The following does NOTHING to protect paleo resources:"MUA-3 Utility avoidance/restricted area – three Paleontological areas (Sugar Bowl, Glens Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5	Comment noted.

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				miles) to overhead and surface disturbance and underground utilities. The current Lands decision is amended to reclassify the area identified as restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way, while protecting the Oregon Trail ruts."	
2	41	11/29/17	Katie Fite, Wildlands Defense	BLM states: Because the proposed water supply pipeline and the Orchard Training Center projects are located within the NCA, they are subject to the terms of Enabling Act that created the NCA. The Enabling Act requires that ground disturbing projects within the NCA must include enhancement of resource conditions.	Comment noted.
2	42	11/29/17	Katie Fite, Wildlands Defense	BLM has not effectively shown that its Gateway FEIS and EA actions "enhance natural resource conditions". There is not a current adequate resource baseline, and BLM ignored any consideration of impacts to individual sensitive animal species, the EA basically treats LEPA as disposable including within the NCA, and many other important natural components plus historical and cultural values of the SRBOPA will be ruined or marred by this action.	H.R. 244 modified the boundary of the NCA to exclude the ROW for Segments 8 and 9. The Project no longer directly affects NCA lands; therefore, the enhancement requirements in the enabling legislation for the NCA no longer apply within the approved ROW.
2	43	11/29/17	Katie Fite, Wildlands Defense	While the EA admits adverse cumulative effects to Historic Trails, it never reveals that quality of the Trail in the areas to be disturbed/marred/destroyed by Gateway, and if other comparable sites exist in the local or regional setting for these trails.	Trail assessments, including photos, photo simulations, and site conditions and use, are discussed in considerable detail in Appendix M to the SEIS.
2	44	11/29/17	Katie Fite, Wildlands Defense	Statements like the following give no indication of the magnitude, location, and irreplaceable value of the resources impacted: "The cumulative impact of past and present land uses on native vegetation is considerable. While the impact of the Project would be minor compared to the much larger past events, when taken together with various proposed developments as specified in Section 4.2 of the Final SEIS, and when added to the impacts from past and present land use changes, the overall cumulative impact would be substantial.	Comment noted. The statement is unambiguous; cumulative effects would be substantial.

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2	45	11/29/17	Katie Fite, Wildlands Defense	This statement shows that BLM would allow Idaho Power to wantonly destroy LEPA habitat and/or occupied sickspots, pollinator habitat, etc. and treats the plant like a weed: "Slickspot peppergrass habitat would be surveyed and avoided to the extent practicable for Gateway West and for other projects with a federal nexus".	The comment is incorrect; this measure does not in any way show that the BLM intends to "wantonly destroy LEPA habitat." On the contrary, it demonstrates the BLM's intent to protect LEPA. Congress and the administration have passed a law that approved building the transmission line through the area. The BLM does not have the authority to overrule Congress. This measure is designed to protect all slickspot peppergrass plants and spots, although there may be unforeseen situations where complete avoidance is not possible.
2	46	11/29/17	Katie Fite, Wildlands Defense	There is no certainty with this loose wording "to the extent practicable" here at all, or of adequate minimization and mitigation measures being applied. This is typical throughout the project lists of BMPs, SOPs, etc.	See the response to the previous comment.
2	47	11/29/17	Katie Fite, Wildlands Defense	The railroad comments about shocks, and equipment failures are a serious public health and safety issue that BLM blows off –punting to the proponents rather than requiring mandatory safety measures for public health and safety in its ROD. (See RR Comments).	The BLM's responsibility is to decide whether or not to authorize a ROW across BLM-managed land. The Proponents are responsible for working with the railroad, which owns the railway ROW, to meet their requirements and to provide for public safety.
2	48	11/29/17	Katie Fite, Wildlands Defense	F-18 BLM Comment response shows the remaining high degree of uncertainty: "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". This admits the public never had a chance to comment on BLM's abrupt change at salmon Falls Creek WSR that significantly harms the Salmon Falls River Canyon area. It is patently false to claim the project is compatible with a recreational river WSR status. The ugly crackling line with 190 ft tall towers is the dead opposite of what is to be expected in a recreational setting, and is INDUSTRIAL instead.	As the comment states, the exact location will not be known until final design; the reasons for this are disclosed in the FEIS and SEIS. The public was given the opportunity to comment on the change in the route in the Salmon Falls Creek area between DEIS and FEIS. The BLM considered public comments on the FEIS (including your comments) prior to preparing the 2013 ROD, which made no decision on that route. An SEIS was prepared that analyzed that crossing and the public had opportunities to comment on that analysis. The project record shows that the BLM received and responded to your comments on this several times.
2	49	11/29/17	Katie Fite, Wildlands Defense	BLM at F-21 states "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	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.

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				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.	The BLM considered public comments on the SEIS in the ROD. It is not illegal to change a route between draft and final.
2	50	11/29/17	Katie Fite, Wildlands Defense	As PFA stated in comments: "The Proponents originally designed 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) There's still no reasonable explanation by proponents or BLM for the split line through Idaho".	The reason for the two lines following separate paths is explained in detail in the original FEIS, 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. The BLM considers this to be a reasonable explanation.
2	51	11/29/17	Katie Fite, Wildlands Defense	Comment F-16 response, BLM admits that costs fluctuate over time. This EA must disclose the current costs vs. benefits, and the CHANGED energy and grid conditions across the West, as well as a glut of wind and other energy.	Comment noted. The SEIS uses updated costs. The BLM considers these to be reasonable approximations for this analysis. The actual costs during construction, which is likely years away, are unknown. Note that the routes approved in 2013 have not yet been built.
2	52	11/29/17	Katie Fite, Wildlands Defense	In Comments at F-71 NPS stated: "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 Section 3.1 and Appendix M to the SEIS.
2	53	11/29/17	Katie Fite, Wildlands Defense	This has not been done for Trails, slickspot peppergrass, or any other affected value of public lands harmed by Gateway. It must be done so that the proper mitigation can be applied, and/or impacts avoided to the maximum degree possible. NPS submitted substantial comments on EIS deficiencies related to Trails, and the EIS fails to rectify this.	As required by the SEIS (see Appendix M), detailed cultural resource/historic properties and plant surveys are required prior to construction. Final mitigation requirements will be based on these surveys and other information. Also see the Programmatic Agreement on historic properties in Appendix E to the 2013 ROD.
2	54	11/29/17	Katie Fite, Wildlands Defense	A Supplemental EIS must be prepared for public review and comment before finalization of the Plan Amendments. The FEIS failed to resolve this uncertainty. The EIS barely scratched the surface in revealing the array of harmful impacts this project and several very harmful segments will have to the native vegetation, rare terrestrial and aquatic species, watersheds, viewsheds and important historical and cultural values and recreational and other human uses across this landscape. Thus, the Plans cannot appropriately be amended.	Comment noted. A SEIS was prepared for the Project. The EA tiers to this analysis.

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2	55	11/29/17	Katie Fite, Wildlands Defense	As referenced in our EA Scoping comments, many crucial elements of the environment were not adequately assessed in the FEIS process, including but not limited to issues and concerns in the Final Supplemental EIS for Segments 8 and 9 of the Project including :	Comment noted. The BLM believes the FEIS and SEIS did adequately analyze environmental effects.
2	56	11/29/17	Katie Fite, Wildlands Defense	Effects to the objects and values for which the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) was designated. Both the FEIS and the EA provide minimal and superficial, if any, analysis of the site-specific and other direct, indirect and cumulative effects on SRBOPA values- including effects on nesting, wintering, foraging and other use by raptors and other sensitive animals species. Baseline inventories are out-dated, and minimal. The project's impacts on the status of local and regional populations of sensitive and other biota are not adequately addressed.	The authorized ROWs are no longer within the NCA . H.R. 244 removed the statutory ROW for Segments 8 and 9 from the NCA by redefining the NCA boundary.
2	57	11/29/17	Katie Fite, Wildlands Defense	Land use conflicts and inconsistency with land use plans; Re: Land use conflicts ---The EIS and EA greatly fail to address conflicts with private land. On both private and public land, the final path is not provided in sufficient detail so that the site-specific effects on the environment can be adequately described and quantified and/or described. Plus the line may ultimately be shifted into areas that deviate from mapped sites. This was done post-decisionally with the eastern Segments of Gateway. Idaho Power had failed to conduct adequately geological and other studies, and a portion of the line had to be moved due to geological instability. This demonstrates why much more intensive and extensive surveys are required for many elements of environmental concern.	The analysis addresses effects to both private and public, although the BLM only makes decisions for portions of the Project on federal land that it administers.
2	58	11/29/17	Katie Fite, Wildlands Defense	The EA information dealing with what has and hasn't yet been amended in LUPs is a morass of confusion. Both the amendments that have already been made as well as those the EA claims to cover are glossed over. No one amendment is adequately examined for impacts. The cumulative effects of all the amendments on values affected/harmed are also not adequately assessed.	Comment noted. The BLM believes that these effects have been adequately addressed.

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2	59	11/29/17	Katie Fite, Wildlands Defense	<p>Effects of the project on local and regional socioeconomic conditions;</p> <p>No hard look has been taken at the negative and harmful socioeconomic impacts of this Project.</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</p>	<p>Comment noted. These issues have been addressed in considerable detail in Chapters 3 and 4 of the SEIS. Also see the appendices attached to the FEIS and SEIS.</p>
2	60	11/29/17	Katie Fite, Wildlands Defense	<p>There are a welter of indirect and cumulative impacts that are not adequately examined in the EA.</p> <p>This includes the adverse direct, indirect and cumulative effects of the B2H line. See FEIS and ROD info at <a href="https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&amp;currentPageId=99006">https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&amp;currentPageId=99006</a></p>	<p>As stated in Section 1.3 of the EA: "The analysis in this EA addresses only the portions of the Project related to Segments 8 and 9. Tiering (40 CFR 1508.28) uses the analysis in broader EIS documents to narrow the range of alternatives and concentrate on the issues not already addressed. This EA incorporates by reference and tiers to the analysis found in the 2013 Final EIS and 2016 Final SEIS regarding Project-wide impacts. The EAs by reference the 2017 Modification Act in its entirety. The BLM will, through a Decision Record supported by this EA, complete the necessary land use plan amendments needed to accommodate ROW segments defined by Alternative 1 in the Final SEIS that are beyond the extent of the statutory ROW created by the Modification Act."</p>
2	61	11/29/17	Katie Fite, Wildlands Defense	<p>The EA fails to adequately describe current and foreseeable changes to environmental laws and regulations under Trump/Zinke including the gutting of the sage-grouse plans and the land use plan amendments that accompanied them.</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>	<p>Agencies must perform environmental reviews based on current policies, regulations, and laws.</p>

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2	62	11/29/17	Katie Fite, Wildlands Defense	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, open space public lands that will now be made ugly, etc.	Effects on resources are disclosed in Chapters 3 and 4 of the FEIS and SEIS. Estimating the cost to ratepayers over the life of the Project is beyond the scope of this analysis. The purpose of this analysis, as stated in Chapter 1 of the FEIS, is to respond to an application from the Proponents for a ROW grant across public lands.
2	63	11/29/17	Katie Fite, Wildlands Defense	<p>The degree to which the project will effect greenhouse gas emissions, and the energy need basis for the project have never been adequately assessed under any EIS alternatives. This is certainly not dealt with adequately in the rubberstamp EA. The project further entrenches a harmful carbon footprint, and is an incredibly wasteful use of land and other natural resources. The immense amounts of steel and other materials including all material used in wires, must be fully assessed for their carbon and other pollution footprints. The project has significant global warming and climate change impacts that must be fully assessed. See <a href="http://siteresources.worldbank.org/EXTENERGY2/Resources/4114199-1292347235985/GHGImpactofTDFullReport.pdf">http://siteresources.worldbank.org/EXTENERGY2/Resources/4114199-1292347235985/GHGImpactofTDFullReport.pdf</a> .</p> <p>This includes discussion of the following applicable to this project: Embodied Emissions in Construction Materials, Energy Use in Construction, Land clearing, corona discharge, SF6 and other non-generation emissions. Plus Idaho Power must provide much more specificity on generation emissions instead of referring vaguely to wind power of which there is a growing glut across the region. All of the emissions associated with the generation of the energy the line will be used to transport, the Gateway and inter-connected B2H project materials production and transportation, fuel involved in construction and operation, loss of vegetation and microbiotic crusts and their ability to absorb carbon dioxide and other climate change gases, and loss of the lands' natural resilience and its ability to buffer the adverse effects of climate change naturally, and</p>	Greenhouse gas emissions are discussed in Section 3.20 of the SEIS.

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				any other emissions and/or losses of climate change gas absorption capability, and loss or impairment of natural processes that serve to sequester carbon or otherwise moderate climate change, must be fully assessed in a SEIS. All greenhouse gases generated and emissions must be accounted for, and assessed in a SEIS, prior to adopting the Proposed Land Use Plan amendments. See for example, sodium hexafluoride <a href="https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions">https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions</a> .	
2	64	11/29/17	Katie Fite, Wildlands Defense	The loss of the ability of the sagebrush systems to buffer climate change or to sequester carbon where vegetation is cleared or herbicided must be assessed. We are increasingly encountering herbicide dead zones in the vicinity of transmission lines in Idaho. BLM must consider the loss of natural carbon storage potential from the large-scale construction of roads, assembly sites/yards, constant de-vegetation in various forms of the powerline corridor, chronic toxic herbicides use and drift, chronic and likely expanded livestock grazing in cleared areas, etc. Given all the many disturbances caused by this project, and the inadequacy of EIS and EA weed and other risk analyses and mitigation, and failure to closely examine effects of livestock grazing - the further spread of annual flammable invasive cheatgrass, medusahead , noxious weed rush skeletonweed, and others is highly likely. This will reduce the ability of the native vegetation systems to absorb and store CO2. Grazing also reduces soil carbon storage, and greatly aggravates weed infestation and weed site dominance risk. Mack and Thompson 1982, Belsky and Gelbard 2000, Chuong et al. 2015. This poses a grave threat to sensitive sagebrush biota from slickspot peppergrass to migratory birds like sage sparrow, Brewer’s sparrow, sage thrasher and of course sage-grouse and pygmy rabbit.	The BLM intends to mitigate Project impacts to vegetation communities on lands formerly within the NCA as well as areas classified as sage-grouse habitat. Restoration of shrubland structure is expected to mitigate impacts in the mid- to long-term. This should lead to increased ability of the area to sequester carbon compared to current conditions.
2	65	11/29/17	Katie Fite, Wildlands Defense	The Proposed action includes a major segmented piece-mealed transmission line, road grading, clearing and road network expansion. It involves miles of new roads and “improved’ roads, plus all manner of additional construction phase disturbance blading, blasting and other	Comment noted. These components of the Project are presented in the SEIS and analyzed in Chapter 3 and associated appendices. Cumulative effects are analyzed in Chapter 4.

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				activity. The route at places diverges from existing corridors, disrupts wildlife habitats and aquatic species watersheds, and substantially mars scenic viewsheds and historic trails and cultural sites, the Snake River Birds of Prey National Conservation Area, the Salmon Falls Creek area WSR other wild lands.	
2	66	11/29/17	Katie Fite, Wildlands Defense	This line will provide a lethal flight hazard all along its length for migratory songbirds and other avian species, rare bats, and native insects. Migration routes have not been studied. The FEIS fails to require that necessary protections are put in place for volant species – for example, every line length between towers must be marked with avian flight diverters. There is no estimate of how many thousands – or more – birds this line may kill during migration periods, or throughout each year. Any facility lighting must be shrouded to minimize effects on night migrants. There appear to be no studies of bird migration patterns and predicted mortality and other harms that have been done for this mammoth project.	The SEIS discloses that areas spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	67	11/29/17	Katie Fite, Wildlands Defense	The line and welter of ancillary facilities provide all manner of elevated avian predator perches and potential nesting sites for sage-grouse nest predators and predators of other avian species as well as predators of rare small mammals like the pygmy rabbit.	See the response to the previous comment.
2	68	11/29/17	Katie Fite, Wildlands Defense	The lack of study of avian migration corridors has long been brought to Idaho Power's attention. Fite (now with WLD) raised this issue throughout the segmented Gateway process. It was ignored there (throughout Gateway East and this has continued in the FEIS for Gateway West). Now this continues in the EA and the connected B2H FEIS. This is a serious public concern. BLM will be violating NEPA, FLPMA, NFMA and the MBTA and BGEPA unless a serious and hard look at the real world effects to these species is taken.	The SEIS discloses that areas spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	69	11/29/17	Katie Fite, Wildlands Defense	This project will result in extensive "take" of migratory birds (several of which are BLM, USFS, or state sensitive species/species of special concern), and golden eagles, as well as potentially bald eagles, too. Bald eagle populations are in decline across this region already. The EIS lacks any valid analysis of the status of local and	Please refer to the USFWS Biological Opinion for a discussion of take. In addition, the SEIS discloses that areas spanned by transmission lines may have indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds

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				regional populations of all avian, bat and other species threatened by collisions with this line, ancillary facilities, and the development sprawl that will take place.	may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
2	70	11/29/17	Katie Fite, Wildlands Defense	Volant species are also greatly threatened, and populations being reduced at unstudied levels, by the profusion of wind farms across the region – both in OR and ID. The combined B2H and Gateway lines are also likely use wind power from wind farms proliferating in Wyoming and other areas along the route (see for example Cat Creek Cargulis comments – and note this project will take a serious toll on wildlife, scenic, recreational and other values if it is built). Yet in the now-outdated wind “integration” info (most recent we can find on Idaho Power’s website), the analysis largely forsakes Wyoming. See: <a href="https://www.idahopower.com/pdfs/AboutUs/PlanningForFuture/irp/2013/windIntegrationStudy.pdf">https://www.idahopower.com/pdfs/AboutUs/PlanningForFuture/irp/2013/windIntegrationStudy.pdf</a> The avian and other rare, sensitive and imperiled species mortality from this wind energy proliferation must also be considered. This is ignored in the cumulative effects analysis. It is necessary to understand migration routes, use patterns/frequent flight paths in the local area, and the current status of populations so impacts can be assessed and effectively minimized and/or mitigated.	An analysis of the effects of wind turbines on volant species is beyond the scope of this analysis. The purpose of this analysis, as stated in Chapter 1 of the FEIS, is to respond to an application from the proponents for a ROW grant across public lands for a transmission line. Also, please see the discussion on the Cat Creek project in our response to your comment above.
2	71	11/29/17	Katie Fite, Wildlands Defense	BLM has failed to properly study and mitigate all of these adverse direct, indirect and cumulative effects on migratory birds, bats and other volant species and their local and regional habitats and populations. It has failed to consider a suitable range of alternatives to protect these species. Plan Amendments cannot be considered until this is done.	Comment noted. The BLM believes that these effects have been adequately addressed and will be sufficiently mitigated.
2	72	11/29/17	Katie Fite, Wildlands Defense	Idaho and Oregon sage-grouse, pygmy rabbit and other wildlife have recently experienced a large number of large fires, exacerbated by extreme weather conditions likely related to climate change. In Idaho, the Soda Fire which we discussed in previous Protests, Appeal, etc. dealt a huge blow to the potential for viable sage-grouse populations in much of the landscape in Owyhee County.	Comment noted. The BLM agrees that large fires are a significant problem.

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2	73	11/29/17	Katie Fite, Wildlands Defense	There have been numerous line-caused raptor electrocution fires in Idaho and Oregon in recent years. There have been a large series of fires in eastern Oregon in recent years. Long Draw and Holloway to the south, the immense Mustang and other fires – over 400,000 acres including crucial sage-grouse habitats. These fires occur amid a sagebrush landscape – especially in the Baker and Vale lands – that have been torn up by livestock forage seedings and exotic plantings during the heyday of the Vale Project, and these “seedings”, and BLM seeding even more harmful exotic species continues up to the present – using post- fire “rehab” as an excuse. The sagebrush sea of Oregon, and adjacent Idaho has become largely a mottled crested wheatgrass and weed wasteland in many places due to fires and human post-fire mis-management. See Arkle et al. 2014, see Soda Fire scientists letter, describing the failure of BLM rehab (much of which will be the very same methods applied with B2H). So not only are the fires, including large numbers that are human-caused like the Soda Fire, and many of which are climate-driven, consuming vast areas of habitats for TES and other important species, the agency “rehab” measures used are further harming the native habitat components that remain.	Comment noted. Raptor electrocutions are an issue with distribution lines rather than 500-kV transmission lines.
2	74	11/29/17	Katie Fite, Wildlands Defense	While BLM claims to apply “Integrated” weed management, the agency steadfastly has failed to address causes of weeds. Thus, “integrated” management is not applied, it is merely spraying/treating in various ways – while chronic grazing disturbance continues non-stop, and large-scale new development like this massive new B2H weed corridor a host of ancillary and linked disturbance continues to tear apart the landscape.	Invasive plants and measures proposed to prevent their spread are discussed in Section 3.8 of the FEIS and SEIS.
2	75	11/29/17	Katie Fite, Wildlands Defense	All known sage-grouse populations are in long-term decline. The GRSG population has already been wiped out along many lengths of the project, and now Gateway and B2H threaten the local populations that remain. Sage-grouse a landscape bird, is suffering from habitat “death by a thousand cuts”. To add in immense new powerlines threatens to further imperil GRSG and numerous other species, and may be the tipping point from which	The Project includes a very detailed, science-based analysis of sage-grouse and their habitat, and includes measures to compensate for habitat loss. See the Sage-grouse Impact Analysis (Appendix I to the FEIS).

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				populations cannot recover. BLM has failed to conduct the necessary habitat and population-level analyses required to apply effective minimization and mitigation measures – including mitigation by avoidance (not building the line).	
2	76	11/29/17	Katie Fite, Wildlands Defense	WLD provided BLM with extensive information about the high risk of weeds, and the need to study this, the long-term ineffectiveness of BLM rehab actions, the serious adverse effects of the Soda and other recent Fires, the lack of effective rehab, and a wealth of other information about the unprecedented stresses on the sagebrush and forested ecosystem in the local and regional area that will suffer from Gateway and B2H. Understanding this range of stresses is crucial for ensuring effectiveness of minimization and mitigation promises made in the EISs.	Comment noted.
2	77	11/29/17	Katie Fite, Wildlands Defense	Climate change will result in hotter temperatures that will also promote cheatgrass, medusahead and other flammable weeds. Ubiquitous livestock grazing impacts across public land and other segments of the route promote these weeds, too. See Belsky and Gelbard 2000, Reisner Dissertation 2010, Reisner et al. 2013. See Attached documents and excerpts. Spring grazing and trampling dries out sites earlier. All of this combined – climate change, hotter temps and less precip failing as snow and earlier snowmelt, increased flammable annual grasses, increased drought and/or extreme weather events – and the chronic extensive disturbance – will exacerbate fire risk.	Comment noted.
2	78	11/29/17	Katie Fite, Wildlands Defense	BLM ignores requiring re-vegetation with local native ecotypes. Forage kochia is a weed that escapes and invades native vegetation communities to their detriment. Using crested wheatgrass should not be allowed. Crested wheat has been shown to move invade areas it has not been seeded. See Stoller (long-term INL studies). Yet these are the species likely to be used across much of the landscape torn up by the project.	Comment noted.
2	79	11/29/17	Katie Fite, Wildlands Defense	In fact, mitigation for this project should include large-scale removal of crested wheatgrass seedings in and near sage-grouse and other rare species habitats. CWG also is now known to spread and invade other areas– see INEL site long-term veg monitoring reports. Moreover, fire after	Comment noted.

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				fire after fire has burned right through the cwg seedings in Vale BLM lands, in the Jarbidge, areas all around the Snake River Plain – Shoshone, Idaho Falls BLM, Pocatello BLM, etc. Despite BLM Range staff claims to the contrary, cwg is a fire hazard.	
2	80	11/29/17	Katie Fite, Wildlands Defense	<p>The line will emit electromagnetic radiation, which is harmful to humans and may also have significant effects on wildlife, domestic animals and other biota. Animals may sense the radiation and avoid it, and/or avoid the crackling/sizzling noise that is audible even to a human ear.</p> <p>IPC has long known about public and biologist’s concerns about electromagnetic radiation. See Gateway Transmission Line EIS documents, for example:</p> <p><a href="http://www.wy.blm.gov/nepa/cfodocs/gateway_west/sgrouse/DEIS-ReferenceMaterial.pdf">http://www.wy.blm.gov/nepa/cfodocs/gateway_west/sgrouse/DEIS-ReferenceMaterial.pdf</a></p>	Electromagnetic effects are presented in Section 3.21. As the analysis shows, the electromagnetic effects fall to background levels near the edges of the ROW.
2	81	11/29/17	Katie Fite, Wildlands Defense	<p>Gateway 3-11-63 states: Greater Sage-Grouse (Candidate; MIS; Forest Service Sensitive; BLM Sensitive)</p> <p>The USFWS’s 12-Month Findings for Petitions to List the Greater Sage-Grouse as Threatened or Endangered (2010e) listed the following as potential impacts to the greater sage-grouse resulting from powerlines: 1) collisions/electrocutions, 2) consolidation of predatory birds along powerlines, 3) lower recruitment rates near lines, 4) habitat fragmentation, 5) degradation of habitat due to spread of invasive plant species, 6) impacts resulting from the line’s electromagnetic fields, and 7) direct loss of habitat. Additional impacts related to construction and operations of the line, as well as associated infrastructure, could include short-term disturbances due to construction and long-term disturbances during operations, increased road access allowing poaching in previously inaccessible locations, and changes to habitat structure resulting from altered fire regimes. Note that many of the general impacts that could occur to this species are addressed in the black-footed ferret section as “impacts that would occur to all</p>	The Project includes a very detailed, science-based analysis of sage-grouse and their habitat, and includes measures to compensate for habitat loss. See the Sage-grouse Impact Analysis (Appendix I to the FEIS).

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				species addressed" (e.g., the effects of fire, poaching, and invasive weeds).	
2	82	11/29/17	Katie Fite, Wildlands Defense	Despite all of the serious adverse impacts of this line, only limited and deficient mitigation has been developed. The latest analysis must rectify this.	Appendix M of the SEIS includes nearly 50 pages of environmental protection measures. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the FEIS and the SEIS. In addition, see Appendix K, the BLM's mitigation framework for impacts within the NCA. In addition, the sage-grouse habitat equivalency analysis addresses Project-effects on sage-grouse and proposes mitigation for direct and 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.
3	1	12/2/17	Julie Randall, Prairie Falcon Audubon	Prairie Falcon Audubon (PFA) is the south-central Idaho chapter of the National Audubon Society, whose mission it is "to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity" In view of this, PFA has undertaken the review and survey of land use practices on public lands including the projects such as Gateway Transmission Line project. We have commented throughout the entire process in hopes the Bureau of Land Management (BLM) would do the right thing and protect the areas right along Salmon Falls Creek for future wildlife and scenic values in the Twin Falls/Burley BLM Field Office.	Your comments on this issue and our responses are part of the project record. The crossing of Salmon Falls Creek would be consistent with the designation as 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 SEIS). In addition, this area is identified as a utility corridor in the 2015 Jarbidge Plan.
3	2	12/2/17	Julie Randall, Prairie Falcon Audubon	Attached is our comments on the " Proposed Gateway West Transmission Line Project Draft Supplemental EIS" dated June 2, 2016. We are resubmitting our attached comments (see attachment 2) because the important issues we brought up were ignored. These include some but not all the important issues PFA raised:	The June 2, 2016 letter (labeled EA-12 in our scoping comment table) was reviewed during the scoping process. These comments and the BLM's response are repeated below.
3	3	12/2/17	Julie Randall, Prairie	Amending without public knowledge, input, or regard, the Salmon Falls Creek Area of Critical Environmental Concern (ACEC) in Burley Field Office (FO) This is still a illegal move by the Burley FO's management and the	The public was given the opportunity to comment on the amendment for Salmon Falls Creek. The BLM considered public comments on the FEIS (including your comments) prior to preparing the 2013 ROD, which

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			Falcon Audubon	proponents of this project. See attachment for full information.	made no decision on that route or the associated plan amendments. A SEIS was prepared which analyzed that crossing and the public had opportunities to comment on that analysis. The project record shows that the BLM received and responded to your comments on this during the SEIS process.
3	4	12/2/17	Julie Randall, Prairie Falcon Audubon	If the hazy and confusing project maps are correct, there is no need to be close to the Salmon Falls Creek Canyon at any point except possibly at the canyon crossing at Lily Grade.	Comment noted
3	5	12/2/17	Julie Randall, Prairie Falcon Audubon	The Construction of the transmission line across Hagerman Valley would be detrimental to waterfowl and other migrating birds, including the Trumpeter Swan. See attachment for more information. (If the map is correct, this appears not to be an issue anymore. The EA's proposed map doesn't show the split line near the Hagerman Wildlife Management Area).	As discussed in the SEIS, the proposed line for Segment 8 was moved to the north of the existing transmission line in the Hagerman area. The route for Segment 9 is approximately 8 miles southwest of the Monument. This is clearly shown in Figure A-2 in Appendix A to the SEIS.
3	6	12/2/17	Julie Randall, Prairie Falcon Audubon	The need for segments 8 and 9. There is still no explanation by proponents or BLM for the split line through Idaho.	The reason for the two lines following separate paths is explained in detail in the original FEIS, 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. Another objective is to serve their growing customer base.
3 (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	The SEIS 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.

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				impacts on visual, wildlife, plant, cultural, and vegetation resources” Final Environmental 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)	
3 (EA-12)	2	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	<p>We believe amending RMPs for segments 8 &amp; 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>Resource 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 SEIS considered the direct, indirect, and cumulative impacts from the land use plan amendments.</p> <p>Alternative 1 follows existing transmission lines where feasible. However, following existing transmission lines or utility corridors is not without impacts. The analysis in the FEIS 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>
3 (EA-12)	3	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	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.	It is correct that the lines on these maps do not show the exact location of the proposed lines. As stated in both the FEIS 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

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					<p>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>
3 (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.  <a href="http://iba.audubon.org/iba/viewSiteProfile.do?siteId=558&amp;navSite=state">http://iba.audubon.org/iba/viewSiteProfile.do?siteId=558&amp;navSite=state</a></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 FEIS and SEIS. Effects to listed species are also disclosed in the USFWS Biological Opinion.</p>
3 (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.  <a href="http://fishandgame.idaho.gov/ifwis/ibt/site.aspx?id=SW36">http://fishandgame.idaho.gov/ifwis/ibt/site.aspx?id=SW36</a></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</p>	<p>Bird collisions are addressed in Section 3.10 of the FEIS and SEIS.</p>

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				energy industry's own literature states that these lines need to be sited away from waterfowl flyways such as the one found in the Hagerman Valley. 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.	
3 (EA-12)	6	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	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.	All BLM decisions on this and other projects must be consistent with applicable laws, regulations, and land use plans, as amended.
3 (EA-12)	7	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	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.  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.	Comment noted. Resource 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 SEIS considered the direct, indirect, and cumulative impacts from the land use plan amendments.
3 (EA-12)	8	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	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). 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 some form of conservation and special management.	The FEIS and SEIS acknowledge the importance of the ACEC. Effects due to permitting the line across the ACEC are disclosed in the SEIS. The BLM must balance completing public and environmental resource needs in managing public land.
3 (EA-12)	9	9-26-17	Prairie Falcon Audubon, Inc	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	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,

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			– Julie Randell	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.	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 SEIS in the ROD. Changing a route between draft and final was not illegal.
3 (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).”</p> <p>... “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>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</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 SEIS. The new plan is described in some detail in Appendix F of the SEIS.</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 SEIS).</p>

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				<p>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.</p> <p>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 Twin Falls. This will be far more important in the future to the area.</p>	
3 (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>The reason for the two lines following separate paths is explained in detail in the original FEIS, 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. Another objective is to serve their growing customer base.</p>

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				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 degarding sage-grouse and other wildlife's habitat "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)	
3 (EA-12)	12	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	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	Comment noted. The BLM must balance completing public and environmental resource needs in managing public land.
3 (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.</p> <p>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</p>	Appendix M of the SEIS includes nearly 50 pages of environmental protection measures. These are referenced throughout the SEIS. Individual measures are evaluated in Chapter 3 of the FEIS and the SEIS. In addition, see Appendix K, the BLM's mitigation framework for residual impacts within the NCA. As noted in the SEIS, 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.

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				<p>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."  <a href="http://www.goldeneagleaudubon.org/Gateway-West-Transmission-Line">http://www.goldeneagleaudubon.org/Gateway-West-Transmission-Line</a></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 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.</p>	
3 (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.
3 (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 seedlings, 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</p>	Comment noted. The decision to allow grazing following construction would be based on site-specific conditions.

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				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.	
3 (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"> <li>• “surface disturbance from the Project within just a half a mile from occupied sensitive plant habitats”.</li> <li>• “Visual resource or scenic specifications for allowable levels of visual contrast would have to be altered” That is to say, blight visual resources across unique western landscapes along it's routes for the foreseeable future.</li> <li>• “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.</li> </ul> <p>“Gateway West would not have measurable adverse effects on natural resources within the project area.”</p>	The FEIS 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 FEIS and SEIS disclose the adverse impacts of the Project using the measures described in the FEIS 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.
3 (EA-12)	17	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	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.	The analysis in Chapter 4 of both the FEIS and SEIS discloses the cumulative effects associated with the transmission line and other past, present, and foreseeable future activities.
3 (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</p>	Comment noted; please see the response above to your similar comment on amending plans.

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				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.	
3 (EA-12)	19	9-26-17	Prairie Falcon Audubon, Inc – Julie Randell	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, 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	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.
3 (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. This Project, like many major ROW projects, is complex. The Project crosses many different habitats and jurisdictions, and affects many resources at varying spatial and temporal scales. Therefore, the analysis is also complex.
3 (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 SEIS), the Lilly Grade crossing is not illegal.
3 (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.	The FEIS and SEIS acknowledge that the Project would have substantial effects, which is why an FEIS was prepared. It provides the public and the decision official the information needed to balance completing resources. The BLM must balance the need to protect habitat with other requirements, such as the need to upgrade the electrical grid.

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				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	
4	1	11/29/17	Walter Meyer, Idaho Chapter OCTA	If shorter segments of the Gateway West Transmission Line can't be realigned in those locations where it crosses Visual Resource Management (VRM) Class 1 and 2 areas along remnants of the Oregon National Historic Trail and its related routes, the BLM will have to downgrade these VRM classes to allow construction of the transmission line.	Comment noted.
4	2	11/29/17	Walter Meyer, Idaho Chapter OCTA	For the above situations, it is recommended that the following measures be taken to assist in partially mitigating losses to the historic and visual integrity of the affected historic trail segments: 1. Installation of interpretive and informational signs along maintained public roads near the historic trail remnants. 2. Development of parking areas (trail heads) along maintained public roads to facilitate public non-motorized access to historic trail remnants.	Comment noted.
4	3	11/29/17	Walter Meyer, Idaho Chapter OCTA	Of course, the Oregon-California Trails Association would prefer that, if feasible, portions of the transmission line be re-routed to prevent adverse impacts to the Oregon National Historic Trail and its related routes and sites. Also, during project construction and maintenance, OCTA recommends that no motorized use be allowed along unaltered or slightly altered historic trail remnants (OCTA's Emigrant Trail Classifications 1,2, and 3).	Comment noted.
5	1	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	The State of Idaho appreciates the opportunity to comment on the Draft Environmental Assessment (Draft EA) for the Gateway West Transmission Line Project (Project). The Idaho Office of Energy and Mineral Resources is the Cooperating Agency for the state, and submits the following comments on behalf of the state and its relevant agencies.	Comment noted.

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5	2	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	BLM should find that the Proposed Action, as described in the Draft EA, is consistent with the national environmental policies and objectives set forth in Section 101 of the National Environmental Policy Act of 1978 (NEPA) and other applicable environmental requirements, and that this Project will not significantly affect the quality of the human environment or otherwise include any condition that would require consultation pursuant to Section 102(2)(C) of NEPA. BLM should further find that the Proposed Action meets the purpose and need of the EA, that BLM evaluated a reasonable range of alternatives, and that the Proposed Action does not require another Environmental Impact Statement. Finally, the BLM should determine that the Proposed Action is reasonably supported by the environmental analysis in the Draft EA, and that the issuance of a finding of no significant impact is appropriate.	Comment noted. The authorized officer will determine this in a decision document for the Project.
5	3	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	The Draft EA indicates that the analysis conducted on Alternative 1 in the Final Supplemental Environmental Impact Statement (FSEIS) is carried forward into the Draft EA. All of the state's comments, including comments from the Idaho Department of Parks and Recreation, submitted with respect to the analysis on Alternative 1 of the FSEIS that is incorporated into the Draft EA should be taken into consideration in BLM's decision making. The state supports adopting the Proposed Action and bringing this Project to its conclusion.	Comment noted.
5	4	12/4/17	John Chatburn, Idaho Governor's Office of Energy & Mineral Resources	Governor Otter, and the State of Idaho are grateful for your commitment to collaboratively bring this Project to a successful conclusion. If you have questions regarding the content of this letter, or need additional information from the state on this project, please do not hesitate to contact me.	Comment noted.
6	1	11/4/17	Jean Public	I AM TOTALLY OPPOSED TO THIS PROJECT. I AM AGAINST RICH WHITE MEN BEING ALLOWED TO DESTROY EARTH SO THEY CAN MAKE BIG MONEY SELLING OUT AMERICAN RICHES. WE NEED ENERGY HERE IN AMERICA. WE NEED TO KEEP	Comment noted

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				ENERGY HERE IN AMERICA FOR OUR USE. WE HAVE PLENTY RIGHT NOW. THERE IS NO REASON AT ALL TO KEEP DRILLING AT THIS TIME AND MAKE MORE AVAILABLE SO IT CAN BE SOLD TO FOREIGNERS. THIS IS AN AMERICAN ENERGY SOURCE THAT SHOULD BE FOR THE BENEFIT OF AMERICANS ONLY. JEAN PUBLIEE JEANUPBLIC1@GMAIL.COM STOP SELLING US OUT	
7	1	12/4/17	James Carkulis, Cat Creek Energy	Cat Creek Energy's review and analysis of the November 3rd release of the Draft Environmental Assessment Alternative 1 for Segments 8 & 9 remains in favor of these paths, with special emphasis on Segment 8 as the proper placement and solution for the Gateway West overall transmission system.	Comment noted.
7	2	12/4/17	James Carkulis, Cat Creek Energy	Reviewing the comments offered up in Appendix F reinforces Cat Creek's consideration for Segment 8 to follow the current 500 kV Midpoint to Hemmingway to Summer Lake transmission line corridor. The environmental comments by third parties overall are well stated and with good intentions. They reinforce our position that new transmission lines should parallel existing corridors when practical. Our position is that by doing so, it lessens the overall impact on migratory corridors and local bird and wildlife populations, as most species already have acquired knowledge of the existing lines and structures. We have no illusions that collisions and temporary displacement of some birds and wildlife shall still occur during construction, but both collisions and displacement will be quantifiably much less than if new transmission line were to be placed in a completely new corridor in which no birds of any species had experience of any manmade structures.	Comment noted.
7	3	12/4/17	James Carkulis, Cat Creek Energy	Our position expressed in our submission of 21-September-2017 remains substantially the same. The northern Segment 8 route has a much smaller environmental impact while simultaneously allowing for necessary future renewable energy generation and energy storage capabilities.	Comment noted. These comment and the BLM's response are part of the project record.
7	4	12/4/17	James Carkulis, Cat	Cat Creek Energy's earlier comments on the BLM EA set out in detail our position on the location of the Gateway	Comment noted.

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			Creek Energy	West transmission line. We insert those comments again for relevance and review, and 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. Cat Creek Energy supports, in company with Idaho Governor Otter and Idaho Congressional Representatives Labrador and Simpson, a Gateway West preferred route incorporating Segment 8, Alternative 1 ("Alt 1").	
7	5	12/4/17	James Carkulis, Cat Creek Energy	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.	Comment noted.
7	6	12/4/17	James Carkulis, Cat Creek Energy	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 and pragmatic factors of paralleling an existing transmission corridor.	Comment noted.
7	7	12/4/17	James Carkulis, Cat Creek Energy	CCE opposed the Alt. 5 route selection on the basis of the following biological considerations: <input type="checkbox"/> 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.	Comment noted.

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				<input type="checkbox"/> The Morley Nelson Snake River Birds of Prey area already contains multiple major transmission corridors well known to both local and migratory avian populations. Birds have acclimated to them. <input type="checkbox"/> 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. <input type="checkbox"/> The Alt 5 route would have displaced more potential sage-grouse habitat than Alt 1 will. <input type="checkbox"/> 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. <input type="checkbox"/> 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.	
7	8	12/4/17	James Carkulis, Cat Creek Energy	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:	Comment noted.
7	9	12/4/17	James Carkulis, Cat	As noted above, the Cat Creek Energy Storage & Renewable Generation Station facility, 25 miles north of	Comment noted.

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			Creek Energy	<p>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"> <li>• 12 – 50 MW hydro turbines in a pump/generator configuration</li> <li>• 30- 3.65 MW wind conversion turbine generators</li> <li>• 186,000 PV solar panels equivalent to 40 MW (AC) max. capacity output</li> <li>• 72,600 MWhrs of energy storage capacity by way of a 100,000 acre-ft Upper Reservoir</li> <li>• A A switch/substation at Mountain Home in the transmission corridor connecting to both the 230 kV and the 500 kV transmission level systems.</li> </ul>	
7	10	12/4/17	James Carkulis, Cat Creek Energy	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.	Comment noted.
7	11	12/4/17	James Carkulis, Cat Creek Energy	<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"> <li>• Gateway West’s installation and function respond to a need for the expanded transmission of renewable energy resources.</li> <li>• 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 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</li> </ul>	Comment noted.

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				<p>Gateway West, but also Cat Creek Energy and its interconnection route.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	
7	12	12/4/17	James Carkulis, Cat Creek Energy	<p>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 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.</p>	Comment noted.

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8	1	12/4/17	John Robinson, Idaho Conservation League	Thank you for the opportunity to provide comments on the Environmental Assessment for the Gateway West Transmission Line Project. Since 1973, the Idaho Conservation League has had long history of involvement with both habitat protection and regional energy issues. As Idaho's largest statewide conservation organization, we represent over 25,000 supporters who want to ensure that energy development and infrastructure are consistent with natural resource protection.	Comment noted.
8	2	12/4/17	John Robinson, Idaho Conservation League	Investing in properly sited transmission systems can protect the environment, promote economic development, diversify the power system and keep the region economically competitive. However, the impact of these transmission systems largely depends on the location of the project, the specific design of the final alignment, and mitigation actions.	Comment noted.
8	3	12/4/17	John Robinson, Idaho Conservation League	The Idaho Conservation League participated in a Gateway West subcommittee of the Boise District Resource Advisory Council and toured several proposed routes multiple times. We submitted comments throughout project development and submitted a protest on the proposed RMP amendments for this project. We have also previously submitted joint comments with The Wilderness Society and the Audubon Society. Please incorporate all our previously submitted comments and our RMP protest into the project record.	Comment noted. These comment and the BLM's response are part of the project record.
8	4	12/4/17	John Robinson, Idaho Conservation League	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 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.	As stated in the EA, "The BLM's discretionary authority is limited by the Modification Act, which directed the agency to issue a statutory ROW for a transmission line and mandated where the ROW would be located. As intended and directed by the legislation, the BLM has offered the statutory ROW to the Proponents. It would now be unreasonable for a BLM decision to deny a ROW for segments intended to connect to the statutory ROW or to offer a ROW that would not physically connect to the statutory segments. For additional ROW segments to connect to the statutory ROW, the BLM has no choice but to select the segments as defined by Alternative 1 in the Final SEIS and mandated in the legislation (Sec. 2(c)(1) of the Modification Act). Said

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					another way, segments that would not align with and connect to the statutory ROW segments are not feasible or reasonable to select at this time.” However, additional NEPA analysis was needed in regards to land use plan amendments that may be needed for portions of the routes not covered by H.R. 244.
8	5	12/4/17	John Robinson, Idaho Conservation League	While the BLM is limited by one action alternative, we believe it is the BLM’s responsibility to consider additional mitigation measures for affected resources and to craft amendments in a way that provides a net increase of conservation protections where possible.	H.R. 244 approved the two routes across the NCA. Logically, this means that the lines from the Midpoint and Cedar Hill substations need to connect with the approved routes within the NCA. The SEIS considered over 50 alternatives between the substations. No new routes connecting the substations via the approved routes across the NCA were identified during scoping.
8	6	12/4/17	John Robinson, Idaho Conservation League	We are also concerned about potential impacts from the lighted towers of the Gateway West transmission line to dark sky resources and to the to the Dark Sky designation being considered near the Bruneau Dunes State Park. As such, we believe the BLM needs to address avoidance, minimization and mitigation criteria for these impacts. The BLM should also convene a management oversight committee regarding enhancement and mitigation efforts for areas affected by Segments 8 and 9. Our specific comments are below.	Infrared obstruction lights that incorporate both red and infrared light-emitting diodes 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 certified to Federal Aviation Administration 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).”

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					The proposed red and infrared lights would appear to comply with these guidelines.
8	7	12/4/17	John Robinson, Idaho Conservation League	Several of the Plan Amendments approved in the January 19, 2017 ROD that selected Alternative 5 (Route 8G and 9K) are no longer needed. These original amendments included one for the Bruneau MFP, two for the Twin Falls MFP, and one for the SRBOP RMP. The Modification Act also superseded the need for seven plan amendments to the SRBOP NCA RMP. The two amendments to the Twin Falls MFP and one amendment to the SRBOP NCA necessary for the route mandated by the Modification Act should be retained.	Comment noted.
8	8	12/4/17	John Robinson, Idaho Conservation League	The Proposed Action would still require seven plan amendments to three current BLM land use plans. The Kuna MFP would be amended to allow the transmission line outside of existing corridors. The Bennett Hills/Timmerman Hills MFP would be amended to allow siting the route near archaeological sites and to change Visual Resource Management Classes. The 1987 Jarbidge RMP would be amended to change Visual Resource Management classes from II to III, to allow the transmission line to cross the Oregon National Historic Trail, and to change a utility avoidance/restricted area designation.	Comment noted. Please see the analysis of these amendments in Appendices F and G of the SEIS.
8	9	12/4/17	John Robinson, Idaho Conservation League	The EA provides a summary of the proposed amendments, listed below. We recommend that the BLM consider crafting these amendments to ensure a net conservation gain where possible. Bennett Hills/Timmerman Hills Management Framework Plan: "No management activity should be allowed to cause any evident changes in the form, line color or texture that is characteristic of the landscape within this Class II area. The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified from VRM II to VRM III (including the existing ROW)."	Comment noted.
8	10	12/4/17	John Robinson, Idaho	The BLM should consider if the VRM I or II areas in the MFP could be expanded to protect other scenic areas or if mitigation measures could remove unnecessary visual	Comment noted.

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			Conservation League	impediments as part of larger restoration efforts, make an area eligible for a more protective VRM designation, and applying more protective VRM in the MFP. Kuna Management Framework Plan: "L-4.1– Confine major new utility R/Ws (i.e., 500 KV or larger or 24-inch pipeline) to existing corridors as shown on Overlay L-4. The R/Ws will be subject to reasonable stipulations to protect other resource uses. Amend Overlay L-4 to add a major transmission line (500-kV) right of way."	
8	11	12/4/17	John Robinson, Idaho Conservation League	The BLM should examine the potential ROWs to see if any are unlikely to be needed and craft the amendment to offset this new ROW by closing another area in the Kuna MFP to such development. Jarbidge Resource Management Plan: "MUA-3 Utility avoidance/restricted area – three Paleontological areas (Sugar Bowl, Glens Ferry, & McGinnis Ranch) and Oregon Trail ruts (7,200 acres/22.5 miles) to overhead and surface disturbance and underground utilities. The current Lands decision is amended to reclassify the area identified as restricted in Section 35, T. 04 S., R. 09 E. to allow the overhead lines of a 500-kV powerline right of way, while protecting the Oregon Trail ruts."	Comment noted.
8	12	12/4/17	John Robinson, Idaho Conservation League	The BLM should examine the latest inventory of paleontological and historic resources and see what, if any, areas are not protected by the MUA-3 Utility avoidance/restricted area. As part of amending the Management Plan to allow the Gateway West ROW, the BLM should expand the avoidance/restriction area to cover unprotected areas of paleontological and historic value. "The existing ruts of the main route, north and south alternate routes of the Oregon Trail and Kelton Road will be protected by not allowing incompatible uses to occur within ½ mile corridor of ruts except where visual impacts are already compromised. Protect existing trail ruts from surface disturbance."	Comment noted.

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8	13	12/4/17	John Robinson, Idaho Conservation League	<p>The BLM should implement mitigation measures to offset for potential impacts from the project. These measures could include closing additional areas of National Historic Trails to motorized use where such use could threaten historic resources, additional outreach, education and enforcement efforts, additional interpretive displays and trailheads in suitable areas, and vegetation restoration projects or purchasing easements on lands with historic, cultural, recreational or conservation value,</p> <p>“The visual or scenic values of the public lands will be considered whenever any physical actions are proposed on BLM lands. The Degree of alterations to the natural landscape will be guided by the criteria established for the four Visual Resource Management Classes as outlined in BLM 8400. VRM Classes will be managed as shown on Map 9. The VRM decisions and Map 9 are amended to accommodate a major powerline R/W. These VRM boundaries are modified according to the new manual to reclassify the VRM Class I area associated with Oregon Trail and the Proposed 500-kV line as VRM Class IV.”</p> <p>And</p> <p>“The VRM decision and Map 9 are amended to accommodate a major powerline R/W. The VRM Classification is amended to change the VRM Class to VRM Class III, adjacent to the proposed line, where the towers would be visible and dominate the landscape.”</p>	<p>Comment noted. The BLM is considering both on-site and off-site mitigation measures for unavoidable impacts (see Section 6.7 of Appendix J to the SEIS, as well as the discussion in Appendix K to that document). Mitigation for Project effects to national historic trails would be implemented in accordance legislation, regulations, Manual 6280 (see Appendix J of the SEIS) and resource 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 SEIS. The BLM will collaborate with cooperators, agencies, and other interested parties to develop appropriate mitigation.</p>
8	14	12/4/17	John Robinson, Idaho Conservation League	<p>The BLM should examine the potential ROWs to see if any are unlikely to be needed and craft the amendment to offset this new ROW by closing another part in the Jarbidge RMP to such development.</p>	<p>A study of future ROW needs across the project area is beyond the scope of this analysis.</p>
8	15	12/4/17	John Robinson, Idaho Conservation League	<p>The Modification Act directed the BLM to apply the Mitigation Framework presented in the Final SEIS to the authorized segments:</p> <p>1 (A) MITIGATION.—During the time of construction of each respective line segment, Gateway West shall mitigate for the impacts related to the transmission lines in accordance with the Compensatory Mitigation and Enhancement framework described in the final Supplemental Environmental Impact Statement with the</p>	<p>Comment noted.</p>

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				<p>stipulation that Compensatory Mitigation and Enhancement costs shall not exceed \$8,543,440.</p> <p>The Mitigation Framework referenced in the Modification Act is the “Compensatory Mitigation Framework for the Morley Nelson Snake River Birds of Prey National Conservation Area,” and was developed specifically to address the “enhancement” requirement of proposals within the SRBOP NCA.</p> <p>We note that the Compensatory Mitigation and Enhancement Framework was written to apply to route segments occurring within the SRBOP at the time the SEIS and ROD were released. The Modification Act withdrew the corridors for Segments 8 and 9 as identified in Alternative 1 but provided that the same Compensatory Mitigation and Enhancement Framework shall be utilized in these segments formerly within the NCA.</p> <p>The BLM must still avoid, minimize and mitigate direct and indirect impacts of the proposed action outside the current or former NCA boundary. This effects analysis includes all portions of Segments 8 and 9 outside the former NCA boundaries to their endpoints at Midpoint and Cedar Hill, respectively. The \$8,543,440 cap on enhancement costs does not apply to these areas.</p>	
8	16	12/4/17	John Robinson, Idaho Conservation League	The following project-wide mitigation plans also apply to the Proposed Action: The Greater Sage-grouse Habitat Mitigation Plan, the Migratory Bird Habitat Mitigation Plan, the Historic Properties Treatment Plan, the Programmatic Agreement Regarding Compliance with the National Historic Preservation Act, and the Framework for Compensatory Mitigation and Monitoring for Unavoidable Impacts to Waters of the U.S.	The comment is correct. The Project-wide mitigation plans approved under the 2013 ROD apply to Segments 8 and 9. Additional mitigation may also be needed.
8	17	12/4/17	John Robinson, Idaho Conservation League	The Final SEIS describes potential direct and indirect impacts to a number of resources, including National Historic Trails, visual resources, cultural resources, vegetation communities, special status plants, wetlands and riparian areas and special status wildlife and fish species, among others. We are particularly concerned about impacts to the Salmon Falls Creek ACEC and to migratory birds, particularly in the Hagerman Wildlife Management Area.	Comment noted. Effects on migratory birds are discussed in Sections 3.10 and 3.11 of the SEIS. Also see the Tables 11.10-1 through 11.11-17 in Appendix D.

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8	18	12/4/17	John Robinson, Idaho Conservation League	<p>We note that BLM Manual 6280 direct the BLM to consider multiple options to eliminate, moderate, rectify impacts:</p> <p>Consistent with BLM Manual 6280, the BLM is required, to the greatest extent possible, to consider opportunities for mitigation to a level commensurate with the adverse impact to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses of the NHT. To eliminate or moderate adverse impacts, the BLM can consider:</p> <ul style="list-style-type: none"> <li>• Rectifying, reducing, or eliminating the impact over time and/or compensating for the impact by replacing or providing substitute resources or environments;</li> <li>• On-site mitigation and design considerations can include moving the project location, minimizing the scale, camouflaging the proposed activity with visual screening techniques, or similar actions; BLM Manual 6280 Inventory and Impacts Analysis for National Historic Trails and Study Trails Gateway West Transmission Line Project 80</li> <li>• Prioritizing on-site mitigation prior to considering off-site mitigation options with regional options being considered prior to statewide options; and/or</li> <li>• Where on-site mitigation (along the Oregon NHT) cannot adequately compensate for an adverse impact, off-site mitigation may include consideration of monetary compensation for public lands along the Oregon NHT.</li> </ul> <p>It is anticipated that mitigation measures would be implemented through site-specific HPTPs. These plans would include measures to avoid, minimize, or mitigate adverse impacts (direct and/or indirect) to the Oregon NHT and/or the North Alternate Study Trail. In the event of unavoidable adverse impacts to the Oregon NHT and/or the North Alternate Study Trail, the Historic Property Treatment Plan may stipulate compensatory mitigation measures</p> <p>Appendix J BLM Manual 6280 Inventory and Impacts Analysis for National Historic Trails and Study Trails</p> <p>We recommend that the BLM implement mitigation measures for each of the impacted resources.</p>	<p>Comment noted. The BLM will collaborate with cooperators, agencies, and other interested parties to develop appropriate mitigation.</p>

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				We note that certain types of mitigation may provide offsets for multiple resources such as native plants, wildlife, and recreation. We understand that it may not be possible to finalize mitigation measures until the micro-siting process is complete to see what issues remain to be mitigated. We remain keenly interested in sage-grouse mitigation efforts described in Section 3.11 of the SEIS and the HEA and request that the BLM keep us informed of that process. We encourage the BLM to ensure that the offsets that the mitigation measures provide last as long as the impacts persist. The BLM should also convene a management oversight committee regarding enhancement and mitigation efforts for areas affected by Segments 8 and 9.	
8	19	12/4/17	John Robinson, Idaho Conservation League	We are also concerned about potential impacts from the lighted towers of the Gateway West transmission line to dark sky resources and to the to the Dark Sky designation being considered near the Bruneau Dunes State Park. As such, we believe the BLM needs to better assess the potential impacts of this project on dark sky features and develop avoidance, minimization and mitigation measures for these impacts.	Please see the response to your comment on the Dark Sky issue above.
9	1	12/4/17	Karen Steenhof	Thank you for the opportunity to comment on the draft Environmental Assessment for Segments 8 and 9 of the Gateway West Transmission Line Project. I support the Proposed Action as well as the proposed Land Use Plan amendments. The Proposed Action paves the way for construction of the transmission lines along the route recommended by the BLM's Boise District Resource Advisory Council, on which I have served and continue to serve. Our panel evaluated several alternative routes within the Boise District and determined that the route identified in the Proposed Action would have the least adverse impact on resources and landowners.	Comment noted.

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	2	12/4/17	Karen Steenhof	As the representative of the Raptor Research Foundation on the Boise District RAC, I look forward to providing additional input as the authorization process continues. I hope to see measures implemented that will enhance nesting opportunities for raptors and discourage roosting and perching opportunities for ravens throughout Segments 8 and 9. For example, artificial platforms like those designed by Morley Nelson for the Summer Lake line would provide more secure nesting locations for Golden Eagles in the area between Con Shea Basin and the Hemmingway Substation, where eagle reproduction has been affected adversely by motorized and non-motorized recreation.	Comment noted. Please see the discussion on mitigation measures in Appendix K to the SEIS. The BLM intends to collaborate with cooperators, agencies, and other interested parties to develop appropriate mitigation. The general process and methods of determining the compensatory mitigation obligation are currently being finalized by an inter-agency oversight committee for approved segments of the Gateway West Project in Wyoming. Once finalized, the process will be vetted and potentially adjusted in the future to conform with state-specific modification for Idaho.
	3	12/4/17	Karen Steenhof	Along the Baha line, the Companies and the BLM need to have a strategy for maintaining nesting opportunities for Ferruginous Hawks, particularly in areas where existing structures will be removed. Biologists and engineers need to work together to come up with proactive, state-of-the-art solutions. Some of these measures could be part of the Companies' design and engineering specifications; others might be part of Migratory Bird Mitigation and the Mitigation Framework for the NCA, referenced in this EA.	Comment noted.
	4	12/4/17	Karen Steenhof	The Companies' draft portfolio for mitigation and enhancement called for a management oversight committee, comprised of individuals with knowledge of the NCA and surrounding areas, who would make recommendations to the BLM on implementation of the enhancement program. In 2014, the RAC endorsed the Companies' suggestion and recommended that the BLM establish this oversight committee as soon as feasible. I did not find any mention of an oversight committee in Appendix K of the Final SEIS. I request that language be added to this Environmental Assessment that stipulates that an oversight committee, under the auspices of the RAC, will provide advice and review of the Companies' Plan of Development to ensure that appropriate approaches for raptor protection and other enhancement measures are adopted during the design and engineering process.	As stated in the SEIS, the BLM is not adopting the Proponents' MEP.

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10	1	21/4/17	Darcy Helmick, Simplot Land and Livestock	Simplot Land & Livestock is a property owner within the area of the proposed alternatives for segments 8 and 9. We are in support of Alternative 1, and believe it is the best path forward for Gateway West.	Comment noted.
10	2	21/4/17	Darcy Helmick, Simplot Land and Livestock	We have previously provided comments based on the impacts to our private property within the area of the proposed segments. All of those comments still apply. It is difficult to determine the complete impact to Simplot property and operations with the range of variability for the exact location of the line. However due to our participation in the original negotiation of these lines, we believe this alternative would have the least amount of impact to our private lands and surrounding public lands as compared to the other alternatives. Financial impacts to agricultural productions could be high in areas where new transmission installation would require movement of current irrigating systems, and could be restrictive in certain management techniques, such as aerial application of fertilizer. These are things that must be considered in the final detailed route selection.	Comment noted. Your comments and the BLM's responses are part of the project record.
11	1	12/4/17	Kelly Fuller, Western Watersheds Project	WWP is a non-profit organization with more than 5,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives and legal advocacy. Western Watersheds Project and its staff and members use and enjoy the public lands at issue and their wildlife, cultural, and natural resources for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes. Western Watersheds Project also has a direct interest in energy transmission and associated disturbance that occurs in areas with sensitive wildlife populations and important wildlife habitat.	Comment noted.
11	2	12/4/17	Kelly Fuller, Western Watersheds Project	The NEPA process for the Gateway West transmission lines has had several stages, and WWP has submitted written input to BLM for each of them. Notwithstanding, many of our concerns still remain. Therefore, we incorporate by reference our previous comment letters, protest, and Interior Board of Land Appeals (IBLA) documents.	WWP's comments and the BLM's responses are part of the project record.

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11	3	12/4/17	Kelly Fuller, Western Watersheds Project	BLM's previous January 19, 2017 Record of Decision for Segments 8 and 9 of the Gateway West Transmission Project was later remanded by IBLA for reconsideration. See DSEA at 1. Although Congress has since approved the construction of Gateway West Segments 8 and 9 and selected portions of their routes, many of the conditions of BLM's January 19, 2017 approval were not mandated by Congress. <sup>1</sup> They now need to be spelled out in a new NEPA decision document since the former Record of Decision no longer applies. This will also provide BLM an opportunity to make public the resource protection conditions that are in the new Right-of-Way (ROW) grant it offered to the Proponents but were not in the original ROW grant. <sup>2</sup> These include protective stipulations in regard to streams and riparian areas, bird nest buffers, and the Native American Graves Protection and Repatriation Act (NAGPRA). See ROW at 14-15. Inclusion in the decision document will benefit both the public and BLM. ROW grants are not generally published, but instead require a FOIA request, which is not something most members of the public know how to do. As a result, the public is not aware that BLM is requiring these resource protections.	Comment noted. BLM managers have determined that the current level of analysis contained in the suite of NEPA documents is sufficient to make an informed decision. The BLM plans on issuing a decision document, the type of decision document will depend on whether or not the authorized officer determines there are new significant impacts associated with the proposed action.
11	4	12/4/17	Kelly Fuller, Western Watersheds Project	In addition, we are concerned that a Finding of No Significant Impact and Decision Record are not the legally appropriate decision documents since the previous EIS Record of Decision was remanded. The January 19, 2017 Record of Decision was specific to Segments 8 and 9 and comprised more than 1,400 pages, including required mitigation, monitoring, and enforcement, and the Right-of-Way (ROW) grant's terms, conditions, and stipulations for construction, operation, and decommissioning of the transmission line; as well as a Proponents' Plan of Development and related frameworks and plans in regard to a wide variety of resources that would be harmed by the Project. These are significant decisions that cannot be resolved by an EA's Finding of No Significant Impact. This Project is of such significant magnitude that a full EIS with Record of Decision is required, and due to the remand, BLM no longer has that.	The BLM may issue a Finding of No New Significant Impacts beyond those disclosed in the SEIS, not a FONSI. The existing FEIS and SEIS disclose the impacts for the various alternatives considered in those documents. Note that the Segment 8 and 9 routes included in the EA are the same as Alternative 1 in the SEIS

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11	5	12/4/17	Kelly Fuller, Western Watersheds Project	One example of a significant decision at stake is a serious new management issue that has arisen with the de-designation of portions of the NCA to accommodate this Project. Since the NCA now includes two non-NCA corridors due to the Modification Act, how will BLM manage to two different land-use standards within the NCA? What will the impacts of split management be? This was not previously addressed in NEPA analysis because past alternatives that routed the Project through the NCA did not anticipate that portions of the NCA would be de-designated.	The decision to revise the boundaries of the NCA was made by Congress and the administration and is separate from any decision contemplated by the current EA. Note that the Act also requires mitigation, as discussed in Section 3.1 of the EA.
11	6	12/4/17	Kelly Fuller, Western Watersheds Project	The DSEA does not substantively respond to our Slickspot peppergrass concerns that additional analysis must be undertaken due to the changed route. Simply referring the public to the SEIS and USFWS Biological Opinion/Conference Opinion fails to respond to the concern. It also fails to respond to any changed conditions since those older documents were prepared. This is especially significant because the FSEIS's Record of Decision was for different routes than Congress has since mandated. Therefore, BLM cannot rely on the FSEIS Record of Decision's statement that "the effects analyses and conclusions for Slickspot peppergrass and its proposed critical habitat in the 2013 concurrence no longer apply to the Project." FSEIS ROD at 24. Nor can BLM rely on the FSEIS ROD's conclusion, based on the routes that have now changed, that "As such, there are no required actions for Slickspot peppergrass." FSEIS ROD at 36. Furthermore, according to the DSEA, it is not known whether USFWS considers the 2013 Conference Opinion to be the current formal Biological Opinion for the Project. DSEA at 17.	The route considered in the EA has not changed. It is the same as the Proposed Action (Alternative 1) in the SEIS. This route was fully analyzed in that document. We are not aware of any additional effects upon slickspot peppergrass beyond those documented in the SEIS.  The BLM continues to work with the USFWS to ensure that the Project complies with the ESA. Please see EA Appendix G for documentation on the BLM's continued consultation with the USFWS.
11	7	12/4/17	Kelly Fuller, Western Watersheds Project	However, the BLM believes that that implementation of the Proposed Action for Segments 8 and 9 of the 2017 EA "may effect", and is "likely to adversely affect" slickspot peppergrass (DSEA at 17). Past NEPA analysis did not adequately address enforceable management thresholds, specific mitigation measures, site-specific mitigation, and monitoring in regard to Slickspot peppergrass. This must now be rectified in the SEA. For example, how will BLM	See the USFWS Biological Opinion and Section 3.7 in the SEIS for Project effects on slickspot peppergrass. Also see Figure E.7-2 in Appendix E of the SEIS for a map showing where the transmission line routes cross peppergrass habitat. TESPL-4 requires a buffer around all slickspot peppergrass plants, slickspot peppergrass habitat, and areas classified as occupied by slickspot peppergrass. See Section 3.8 of the SEIS for measures

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				enforce and monitor to ensure that the Project's disturbance does not increase cheatgrass growth, a known threat to Slickspot peppergrass?	required to prevent invasive plants from spreading in the project area.
11	8	12/4/17	Kelly Fuller, Western Watersheds Project	The DSEA has not adequately addressed the concerns about greater sage-grouse that we have raised throughout this process, such as in the Statement of Reasons that we filed during our appeal of the SEIS ROD at IBLA. See Appendix L.3 First, the remanded FSEIS ROD claimed that the Project will "achieve a net conservation gain" for sage-grouse based upon compensatory mitigation. FSEIS ROD at 21. However, a "draft" plan was only ever published, and BLM itself acknowledged it was inadequate to mitigate effects. Id. The FSEIS ROD also claimed that Proponents and the agencies will collaborate on a more effective mitigation plan at some unspecified time in the future. Id. This has not been remedied in the DSEA, which relies on the same incomplete mitigation plans that the FSEIS did. See DSEA at 8. Second, the local population of sage-grouse is isolated, small and suffering from degraded habitat. This Project will subject the local sage-grouse population to habitat fragmentation through the construction of powerlines and roads, as well as the indirect effect of habitat abandonment due to the construction of tall structures (e.g., transmission towers and lines). When sage-grouse populations become isolated, they become at "greater risk of extinction due to genetic and demographic concerns such as inbreeding depression, loss of genetic diversity, and Allee effect (the difficulty of individuals finding one another), particularly where populations are small." See Statement of Reasons at 7. Third, BLM inadequately analyzed direct and indirect impacts to sage-grouse, and failed to consider important findings on sage-grouse released between 2013 and 2016 that were relevant to the Project's impacts. See Statement of Reasons at 8-12. Fourth, BLM inadequately analyzed cumulative impacts to sage-grouse. See Statement of Reasons at 12-16.	Comment noted. Effects on sage-grouse were analyzed in the science-based HEA prepared for the Project, and summarized in Chapter 3 of the FEIS and SEIS.
11	9	12/4/17	Kelly Fuller, Western	At this point in the history of the Gateway West Project, there are mitigation strategies, frameworks, and individual mitigation measures scattered throughout thousands of	Comment noted. The required mitigation for the segments of the Gateway West Project approved in 2013 are part of the ROW grant for those segments.

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			Watersheds Project	pages of NEPA documentation, as well as Congressional instructions regarding mitigation via the Modification Act. This highly fragmented record makes it difficult for the public to decipher which mitigation is still proposed, which no longer applies, and which is not yet fully developed. We appreciate that BLM has attempted in the DSEA to clarify the still-applicable mitigation. DSEA at 8. More clarification is still needed, however.	They are included in an appendix to the ROD for that document. The general process and methods of determining the compensatory mitigation obligation are currently being finalized by an inter-agency oversight committee for approved segments of the Gateway West Project in Wyoming. Once finalized, the process will be vetted and potentially adjusted in the future to conform with state-specific modification for Idaho. Once complete, the compensatory mitigation plan will be assessed for compliance with the mitigation standard set forth in the FEIS and SEIS RODs before issuance of a Notice to Proceed for construction of the Project.
11	10	12/4/17	Kelly Fuller, Western Watersheds Project	It is unclear from the DSEA which of the proposed mitigation and compensatory mitigation measures proposed in past Gateway West NEPA analyses BLM still intends to require for impacts and residual effects to greater sage-grouse and other wildlife located inside the Birds of Prey NCA along the two narrow pathways through the NCA that Congress has now stripped of their NCA designation. For example, the Final Environmental Impact Statement (FSEIS) contains five mitigation/enhancement measures proposed specifically for the Birds of Prey NCA: habitat restoration, property purchase, law enforcement, visitor enhancement, and line and substation removal. FSEIS at 3.11-35. The DSEA states, "The Modification Act also removed the lands affected by this ROW from NCA status and stipulated that the Mitigation Framework presented in the Final SEIS would apply to the authorized segments." DSEA at 2. This would seem to indicate that anything proposed in the FSEIS Mitigation Framework still applies. But do individual mitigation/enhancement measures proposed in the FSEIS but not included specifically in the Mitigation Framework that was referenced by Congress in the Modification Act still apply?	See the previous response.
11	11	12/4/17	Kelly Fuller, Western Watersheds Project	The DSEA further states, "The Modification Act also removed the statutory ROW from the NCA by redefining the NCA boundary. The statutory ROW created a public land corridor across the NCA that is not within the NCA and is therefore not subject to the Public Law 103-64 (16 U.S.C. 460iii-2; 107 Stat. 304) (Enabling Act) that created	The Act also included a requirement for mitigation for the NCA. As stated in the EA: "In addition to these Project-wide plans, the BLM has worked with the Proponents to develop the Mitigation Framework for the NCA (Appendix K to the Final SEIS). The Mitigation Framework for the NCA is intended to analyze and

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				the NCA.” DSEA at 3. This is significant because some of the mitigation measures proposed in the FSEIS’s section 3.11 are specifically identified as “enhancement,” a term that applies specifically to NCAs. Will BLM still require the mitigation measures that were described in past NEPA analysis as “enhancement”? If not, what will BLM require in their stead to reduce the residual effects to wildlife that would have been offset by the proposed “enhancement” measures?	facilitate the development of a Mitigation Plan to offset reasonably foreseeable remaining residual effects from the Project within the NCA. BLM offered the statutory ROW grant authorized by the Modification Act Sec. 2(c)(1) to the Proponents on July 26, 2017. In Sec. 2(c)(2)(A), the Modification Act also stipulated that the Mitigation Framework presented in the Final SEIS would apply to the authorized segments. For mitigating Gateway West Transmission Project impacts within the NCA, the BLM will implement, as directed by Congress, all conditions in Sec. 2(c) of the Modification Act (see Appendix D).”
11	12	12/4/17	Kelly Fuller, Western Watersheds Project	In addition, we note that it has been almost a year since the FSEIS Record of Decision was published, yet the DSEA does not include updated versions of the various mitigation frameworks and strategies. When will BLM make the updated versions available for public comment through a NEPA or other process? When will they be final? We continue to be concerned that some of the mitigation plans for wildlife and habitat have not been fully developed. As we explained in our IBLA appeal, this is insufficient to meet BLM’s legal obligations.	Other than adding new foreseeable projects to the cumulative effects analysis, there are no new analyses in the draft EA. All analyses disclosing impacts on sage-grouse and their habitat can be found in the FEIS and SEIS. BLM managers have determined that the current level of analysis contained in the suite of NEPA documents is sufficient to make an informed decision. The general process and methods of determining the compensatory mitigation obligation are currently being finalized by an inter-agency oversight committee for approved segments of the Gateway West Project in Wyoming. Once finalized, the process will be vetted and potentially adjusted in the future to conform with state-specific modification for Idaho. Once complete, the compensatory mitigation plan will be assessed for compliance with the mitigation standard set forth in the FEIS and SEIS RODs before issuance of a Notice to Proceed for construction of the Project.
11	13	12/4/17	Kelly Fuller, Western Watersheds Project	We again suggest that grazing allotment retirement be considered as a mitigation measure for the Gateway West Transmission Project. It is a proven and cost-effective method of obtaining habitat service gains, as well as a way of facilitating fence removal, which is one of the potential mitigation measures analyzed in Gateway West’s Habitat Equivalency Analysis (HEA). In our experience, riparian areas where grazing has been removed can show markedly beneficial changes in two to five years, while upland areas take longer. A grazing rest study of riparian	Comment noted.

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				areas in the Hart Mountains in Oregon found fourfold increases in willows and rushes, and a 90% bare soil reduction over a period of two decades. See Batchelor, et al. (Appendix I). Another area where livestock have been removed to the benefit of sage-grouse and pronghorn is the Charles Sheldon National Wildlife Refuge in northwest Nevada. In addition, very dry uplands with removed or very reduced livestock use on BLM lands in Lemhi County, Idaho have recovered their native bunchgrass health within ten years. Furthermore, 25- and 45-year studies of grazing removal at the Idaho National Energy Laboratory showed dramatic increases in perennial grass cover. In the 45-year study, forbs, shrubs, and vegetative diversity also greatly increased. See Anderson and Holte (Appendix J) and Anderson and Inouye. Moreover, a study of 75 Great Basin sites in Oregon showed that removing livestock impacts is very beneficial for native vegetation and ecological health. See Reisner, et al (Appendix K).	
11	14	12/4/17	Kelly Fuller, Western Watersheds Project	Although the Project's HEA did not analyze grazing buyouts as a sage-grouse mitigation tool, BLM is not required to limit its mitigation toolbox to only those mitigation choices analyzed in an HEA.	Comment noted.
11	15	12/4/17	Kelly Fuller, Western Watersheds Project	As we stated in our scoping comments, Gateway West Segments 8 and 9 is going to kill a lot of birds, and BLM's previous NEPA analyses do not adequately assess those impacts. In our scoping comments, we provided mortality estimates and the study we based those estimates on. We note with dismay that in the DSEA, BLM continues to rely on the prior inadequate NEPA analyses.	Areas of the ROW spanned by transmission lines, while not cleared of vegetation, may cause indirect effects to migratory birds and habitats, but our ability to quantify these impacts and develop meaningful mitigation, much less an estimate of how many birds may be killed or injured, is limited. The Migratory Bird Plan developed for the Project presents a reasonable analysis and appropriate conclusions from the available research and fully meets the intent of the MBTA.
11	16	12/4/17	Kelly Fuller, Western Watersheds Project	Furthermore, we are concerned that the current proposed mitigation measures for migratory birds and their habitat do not appear to require avian mortality studies. The Project's draft Migratory Bird Habitat Mitigation Plan (2013) includes an element described as an Avian Reporting System: The Bird Mortality Tracking System is an important part of Rocky Mountain Power's adaptive management process.	Comment noted.

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				<p>The reporting system is used to identified [sic] bird mortalities and problem nests associated with Rocky Mountain Power electrical facilities in a centralized database. Additionally, when fatalities or problem nests are discovered, resource agencies are notified according to applicable procedures, permits, and regulations. Rocky Mountain Power uses, and will continue to use, the resulting data to indicate areas that may pose relatively high risk to birds, and which need additional measures to address this risk. The data may also indicate particular equipment types and/or configurations that pose a higher risk to birds.</p> <p>Appendix D of 2013 EIS ROD at 23.</p> <p>This appears to be a description of what happens if workers find dead birds in the fulfillment of their normal duties rather than actual mortality studies with systematic searches.5 Unfortunately, voluntary reporting of incidentally found dead birds to agencies is no substitute for an actual mortality study. In contrast to simply reporting dead birds found incidentally, mortality studies allow reasonable estimates of project mortality, in part because they test and adjust for searcher efficiency and scavenger removal of bird carcasses.</p> <p>Without requiring avian mortality studies, BLM has no way of knowing whether the avoidance and minimization measures described in the NEPA documentation such as marking power lines, are working or not, as well as whether adaptive management is required. This appears to be contrary to regulation: "A monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation." 40 CFR §1505.2(c). As we described in our DSEA scoping comments, a reasonable estimate for bird mortality from Segments 8 and 9 of the Gateway West Project would be around 14,000 birds killed annually and more than 700,000 birds killed over the 50-year life of the Project. WWP DSEA Scoping Comments at 3 (Appendix B). That is a lot of birds, and many if not most of them are protected by the Migratory Bird Treaty Act. Therefore, it is critical that the BLM know whether the avoidance and minimization</p>	

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				mitigation measures it is requiring are working or if adaptive management is called for.	
11	17	12/4/17	Kelly Fuller, Western Watersheds Project	The Cat Creek Energy Project is a proposed 750 MW renewable energy generating and storage project 25 miles north of Mountain Home, Idaho. The proposal includes a large amount of new energy infrastructure: 400 MW pumped storage hydropower, 30 3.65 MW wind turbines, utility-scale wind power, 186,000 solar PV panels, a 230 kV transmission line, and a substation directly connecting to 230 kV and 500 kV transmission systems. <sup>6</sup> The Project has been making its way through government regulatory processes for some time, <sup>7</sup> and the Proponent told the Idaho House of Representatives in March 2017 that it had completed 7,000 pages of an Environmental Impact Statement. <sup>8</sup> Although the reservoir portion of the Cat Creek Project would be on private land, there is a federal nexus because it reportedly requires permits, approvals, and/or consultation from the U.S. Forest Service, U.S. Bureau of Reclamation, and U.S. Fish and Wildlife Service <sup>9</sup> , as well as the Bonneville Power Administration.	The BLM considered including the Cat Creek pump-storage hydroelectric project near Pine in our cumulative impacts analysis. We are aware that Cat Creek provided an optimistic picture of the project in their presentation to the legislature in March. In response to their claims, the Bureau of Reclamation sent a letter to Cat Creek dated March 24, 2017 stating: “Reclamation is concerned that Cat Creek does not understand the LOPP process, current status, or a realistic timeline, especially given that little progress has been made since Reclamation notified Cat Creek of its selection as preliminary lessee by letter dated October 17, 2016.” Reclamation further stated: “Reclamation’s October 17, 2016 letter to Cat Creek does not authorize Cat Creek to use water from Anderson Ranch Reservoir or to begin construction activities.” As far as BLM can determine, Cat Creek has not followed through on any of the steps Reclamation’s letter identified as needing to be addressed. In light of this uncertainty, we have not included it as a foreseeable project for the Gateway West cumulative effects analysis.
11	18	12/4/17	Kelly Fuller, Western Watersheds Project	Furthermore, Cat Creek Energy Project states their project will be operational in 2020 (DSEA at F-11) and “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.” DSEA at F-9. This would be a massive project, and its various components would produce significant impacts to wildlife and habitat. <sup>11</sup> As a result, in 2016 American Bird Conservancy (ABC) and Golden Eagle Audubon Society (GEAS) wrote to the U.S. Fish and Wildlife Service about their concerns regarding the Cat Creek Energy Project: “ABC and GEAS are concerned that the proposed site for this project poses an unacceptably high risk to state and federally protected wildlife species.” See ABC-GEAS Letter at 1 (Appendix D). The ABC-GEAS letter cites potential impacts to migratory birds, raptors, eagles, and	Cat Creek based this prediction on beginning construction is 2017, which did not happen. The Reclamation letter points out that the NEPA analysis for a project of this size and complexity typically takes several years. Based on Reclamation’s letter quoted above, the project will not be in service by 2020, nor is there any way to determine at this time when this could occur, or even if they will get the approvals they need to build the project.

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				bats.12 The ABC-GEAS letter also cited a 2016 letter from the Idaho Department Fish and Game that raised concerns about the potential loss of two greater sage-sage grouse leks said to be within a half mile of the proposed Cat Creek Energy Project.	
11	19	12/4/17	Kelly Fuller, Western Watersheds Project	<p>There are a number of reasons why the Cat Creek Energy Project must be included in the BLM's Gateway West, Segments 8 and 9 SEA NEPA analysis as an indirect and/or cumulative impact.</p> <p>As BLM is aware, a NEPA analysis must analyze direct, indirect, and cumulative impacts on the environment. Indirect effects are those "which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. § 1508.8(b).</p> <p>Cumulative impacts are those which result from the "incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." 40 C.F.R. § 1508.7.</p>	Please see the previous responses concerning the Cat Creek Project.
11	20	12/4/17	Kelly Fuller, Western Watersheds Project	<p>Here, available information indicates the Cat Creek project would effectively be caused and induced by the construction of Gateway West and the availability of that type of transmission line; and the project is reasonably foreseeable.</p> <p>First, the Cat Creek Energy Project's scoping comments for this DSEA (as excerpted in the DSEA) state that Cat Creek Energy will interconnect to the Gateway West transmission line:</p> <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</p>	Please see the previous responses concerning the Cat Creek Project.

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				<p>series of transmission in the Mountain Home, ID transmission corridor including the anticipated new 500 kV Gateway West transmission line.</p> <p>DSEA at F-9.</p> <p>Second, Cat Creek Energy states that the environmental impacts of their Project and Gateway West are directly related to each other: "In addition, Segment 8, Alt 1 reduces the environmental impact for not only Gateway West, but also Cat Creek Energy and its interconnection route." DSEA at F-12. This statement demonstrates that the Cat Creek Energy Project is connected to Gateway West. If they were unrelated actions, changing the Gateway West route would not also change the environmental impacts of the Cat Creek Energy Project.</p> <p>Third, Cat Creek Energy states that its Project will create a transmission intertie between Gateway West and two other transmission lines: "There is at present no off-ramp or intertie from Midpoint to Hemingway substations on Gateway West. CCE [Cat Creek Energy Project] would create an intertie between the 230 kV IPCo system, the current PacifiCorp 500 kV line, and Gateway West with the Alt 1 route." DSEA at F-12.</p> <p>Thus, the Cat Creek Energy Project is related to the Gateway West transmission lines in Idaho and is a proposed project with both federal and nonfederal agency decisions in the works. It has not previously been analyzed in the Gateway West NEPA documentation, so must be analyzed in this SEA. The question before the BLM is what the Cat Creek Energy Project should be analyzed as. Based on the information that is currently publicly available, we believe it should be analyzed in both the indirect effects and cumulative effects sections of the SEA.</p>	
11	21	12/4/17	Kelly Fuller, Western Watersheds Project	<p>Energy generation projects such as Cat Creek cannot be built without transmission to transport their power to market, and Cat Creek's very large proposed size (750 MW) means that it not only needs transmission capacity, but also a lot of it, which further ties the Cat Creek Energy Project to Gateway West. Cat Creek is reasonably foreseeable because it has initiated the permitting process</p>	Comment noted.

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				at multiple agencies and told the Idaho State Legislature in March 2017 that it had completed about 7,000 pages of an Environmental Impact Statement. See Minutes of Idaho Legislature at 1.	
11	22	12/4/17	Kelly Fuller, Western Watersheds Project	In closing, how BLM decides to move ahead with this 50-year Project will affect wildlife and wildlife habitat for decades to come. Given this Project's plethora of significant impacts, BLM's still-to-be-made mitigation decisions are especially critical. To that end, we would like to request a meeting with BLM to discuss mitigation and other aspects of the Project. We have staff in Idaho who could easily meet with you in person, and we would greatly appreciate you contacting myself or our Senior Attorney, Kristin Ruether, to set up a meeting. She can be reached at <a href="mailto:kruether@westernwatersheds.org">kruether@westernwatersheds.org</a> or (208) 440-1930.	Comment noted.