

**APPENDIX A
RESPONSES TO COMMENTS ON FINAL EIS**

Letter #	Owner	Organization	Comment	Response
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS	Supposedly, the rationale for this position is that allowing a new transmission line within the Morley Nelson Snake River Birds of Prey National Conservation Area (MNSRBOPNCA) would set a bad precedent for other NCAs. In fact, disallowing a properly designed transmission line within the MNSRBOPNCA would set an even more dangerous precedent: making a decision that is inconsistent with peer-reviewed science and specifically data collected about transmission line impacts within the NCA in question. According to the NLCS website, "Science plays an important role in how the the [sic] National Landscape Conservation System lands are managed" It is unclear how science played a role in this particular decision by NLCS. The prohibition of all new transmission lines within the MNSRBOPNCA is inconsistent with scientific evidence gathered by the BLM's own biologists.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS	In 1981, less than a year after Secretary of the Interior Cecil Andrus withdrew 482,000 acres of public land to protect birds of prey nesting in the Snake River Canyon in southwestern Idaho, Pacific Power and Light Company (PP&L; now PacifiCorp) began construction of a 500-kV transmission line across what is now the Morley Nelson Snake River Birds of Prey National Conservation Area. Raptor Expert Morley Nelson assisted PP&L with routing the line so it would not adversely affect raptors and with designing platforms for transmission towers that would encourage raptor nesting (Nelson 1976, Nelson and Nelson 1982). From 1981 through 1989, Bureau of Land Management (BLM) and PP&L biologists monitored the response of raptors and ravens to the transmission line (Engel et al. 1992, Steenhof et al.1993). They found that the 500-kV transmission line enhanced opportunities for raptor perching, nesting, and roosting. Unlike smaller distribution lines, large transmission lines do not present an electrocution hazard for large birds because the wires are too far apart for raptor wings to contact more than one wire at a time. Collision with transmission lines does not appear to be an issue for birds of prey in desert environments. Raptors and ravens were attracted to the 500-kV line, and productivity of hawks and eagles nesting on transmission towers was as good as and sometimes better than that of those nesting in the canyon. In some cases, transmission line towers provided more secure nesting substrate than natural nesting sites. By 1989, 8 pairs of Golden Eagles, 11 pairs of Ferruginous Hawks, 33 pairs of Red-tailed Hawks, and 81 pairs of ravens were nesting on the transmission line between Midpoint, Idaho and Summer Lake, Oregon (Steenhof et al. 1993). In addition, biologists documented 13 communal night roosts of Common Ravens on the transmission line, including one roost on transmission line towers within the MNSRBOPNCA with more than 2100 ravens, one of the largest raven communal roosts ever documented in the world (Engel et al. 1992). Ravens used the roosts from spring to autumn, and	Engel et al. 1992, Steenhof et al.1993, and several other studies pertinent to the SRBOP issues were considered in the analysis for the FEIS (literature is cited in Chapter 7). The EIS agrees that the connectors on 500 kV lines are too far apart (19.5 feet) for a raptor to electrocute itself (Section 3.10.2.2 of the FEIS); however, the BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared. A discussion of predation due to increased perching habitat is located in Section 3.11.2.2 of the FEIS.

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			as many as 700 roosted on a single tower. A new transmission line in Owyhee County (9E) would attract raptors and ravens and could lead to increased predation on declining Greater sage-grouse populations. Golden Eagles prey on adult Sage Grouse, and Common Ravens are a major predator of Sage Grouse eggs. Recently, Idaho State University (ISU) biologists have noted a dramatic increase in the predation of Sage Grouse by ravens. Where there are more ravens, nesting female Sage Grouse stay on their nests much longer, leaving less often. Less time foraging may cause "substantial physiological distress" on the Sage Grouse. It would be better to attract raptors and ravens to cheatgrass areas in the MNSRBOPNCA where they feed on ground squirrels than to shrubsteppe areas inhabited by sage-grouse in Owyhee County.	
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS	As a conservationist and one of the biologists who studied the effects of the PP&L (now PacifiCorp) 500-kV line, I urge the NLCS to change its position on this issue. The Morley Nelson Snake River Birds of Prey NCA was never intended to be a wilderness area. Legislation that established the MNSRBOPNCA identified its purposes to be "conservation, protection and enhancement of raptor populations and habitat." The legislation further recognized that BLM management of the area should allow "for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats." A new transmission line, carefully routed within the NCA, could be completely consistent with these goals. Morley Nelson's life work was dedicated to demonstrating that protecting raptors could be compatible with electrical lines. Proposed route 8E, which would require a new road through shrub habitat, is likely incompatible with maintaining raptor foraging habitat. However, all evidence indicates that Route 9D, as originally proposed by the Owyhee Task Force with a crossing just upstream from Swan Falls, would be compatible with raptors. In the spirit of the legislation that established the MNSRBOPNCA, and in the spirit of Morley Nelson, I urge NLCS officials to re-evaluate their position and to endorse a route that affords protection to both raptors and grouse.	Nothing in the EIS implies that the NCA should be managed as a Wilderness. The RMP for the SRBOP NCA allows multiple use, including two designated utility corridors. However, the BLM concluded that the ground disturbance and new access roads associated with Proposed 8 and Alternative 9D would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared. Your opinion that this is not the case is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	In 1981, less than a year after Secretary of the Interior Cecil Andrus withdrew 482,000 acres of public land to protect birds of prey nesting in the Snake River Canyon in southwestern Idaho, Pacific Power and Light Company (PP&L; now PacifiCorp) began construction of a 500-kV transmission line across what is now the Morley Nelson Snake River Birds of Prey National Conservation Area. Raptor Expert Morley Nelson assisted PP&L with routing the line so it would not adversely affect raptors and with designing platforms for transmission towers that would encourage raptor nesting (Nelson 1976, Nelson and Nelson 1982). From 1981 through 1989, Bureau of Land Management (BLM) and PP&L biologists monitored the response of raptors and ravens to the transmission line (Engel et al. 1992, Steenhof et al.1993). They found that the 500-kV transmission line enhanced opportunities for	A discussion of predation due to increased perching habitat is included in Section 3.11.2.2 of the FEIS. The Engel et al. (1992) and Steenhof et al.(1993) studies referenced in the comment were considered in the analysis for the FEIS; however, the BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared.

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			raptor perching, nesting, and roosting. Unlike smaller distribution lines, large transmission lines do not present an electrocution hazard for large birds because the wires are too far apart for raptor wings to contact more than one wire at a time. Collision with transmission lines does not appear to be an issue for birds of prey in desert environments. Raptors and ravens were attracted to the 500-kV line, and productivity of hawks and eagles nesting on transmission towers was as good as and sometimes better than that of those nesting in the canyon. In some cases, transmission line towers provided more secure nesting substrate than natural nesting sites. By 1989, 8 pairs of Golden Eagles, 11 pairs of Ferruginous Hawks, 33 pairs of Red-tailed Hawks, and 81 pairs of ravens were nesting on the transmission line between Midpoint, Idaho and Summer Lake, Oregon (Steenhof et al. 1993). In addition, biologists documented 13 communal night roosts of Common Ravens on the transmission line, including one roost on transmission line towers within the MNSRBOPNCA with more than 2100 ravens, one of the largest raven communal roosts ever documented in the world (Engel et al. 1992). Ravens used the roosts from spring to autumn, and as many as 700 roosted on a single tower. References: Nelson, M.W. 1982. Human impacts on golden eagles: a positive outlook for the 1980's and 1990's. Raptor Research 16:97-103. Nelson, M.W., and P. Nelson. 1976. Power lines and birds of prey. Idaho Wildlife Review 28:3-7. Engel, K.A., L. S. Young, K. Steenhof, J.A. Roppe and M.N. Kochert. 1992. Communal roosting of common ravens in southwestern Idaho. Wilson Bulletin 104: 105-121. Steenhof, K., M.N. Kochert and J.A. Roppe. 1993. Nesting by raptors and common ravens on electrical transmission line towers. Journal of Wildlife Management 57: 271-281.	
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	In our coordination with local BLM managers and the BLM Project manager, we had been advised to submit two additional routes for consideration. Our citizen's group developed two routes, the one previously addressed and designated 9D and one which was also submitted for consideration by the county and designated by BLM as 9E. While 9E traversed the county on primarily federally owned lands, and was submitted by the county in our letter providing alternate routes, we acknowledged in our submission letter that it was not a viable alternative due to concerns about Sage Grouse impacts. Route segment 9E, with modifications proposed by NLCS, now crosses private lands where those landowners, unlike those impacted by our 9D segment, have not agreed to the line on their property.	Alternative 9E, which is part of the BLM's Preferred Route, was revised to avoid preliminary priority habitat (PPH) for sage-grouse. Based on indicative engineering, it does impact 7 acres due to expansion of existing roads. PPH would be avoided to the extent feasible during final design. Both Alternative 9D and Alternative 9E cross approximately 3.3 miles of private land but do not cross within 1,000 feet of any residence. The Proposed Route would cross within 1,000 feet of 9 residences and crosses 18.2 miles of private land. The BLM concluded that Alternative 9D, the route favored by the County, would not meet the enhancement requirements of the enabling legislation for the NCA based on the proposed mitigation available at the time the FEIS was prepared.
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	It also impacts grazing activity on federal lands, which will have significant impact to the operators during the construction phase.	Effects of the Project on grazing are discussed in Sections 3.17 and 3.18 of the FEIS.

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100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	We made clear in our letter of submission that 9D was the preferable route and the route with the least adverse impacts to private lands and to sensitive species.	Your preference for Alternative 9D was understood. However, we note that both Alternative 9D and Alternative 9E cross approximately 3.3 miles of private land, vs. 18.2 miles for the Proposed Route, and neither cross within 1,000 feet of any residence (the Proposed Route would cross within 1,000 feet of 9 residences). Alternative 9E would affect 1 acre of agriculture land vs. 2 acres for 9D. The major difference between the two alternatives is in where they cross the NCA; Alternative 9D would be in the NCA for more than half its length and it would cross through the center of the NCA. Alternative 9E would largely avoid the NCA.
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	<p>On February 17, 2012, BLM Boise District Manager Aden Seidlitz provided a letter to the Owyhee County Commission (Enclosure 1). The letter thanked the County for our involvement, indicated that the Boise District would soon be " ... expected to provide input to what will be identified as the Preferred Route." and proposed the following: "Based on the coordination effort we completed with you in November, we are requesting a confirmation of your acceptance to our recommendation for a route that we believe is viable and would result in achieving the majority of goals identified by both parties. While this route is not a perfect solution to the problem we have addressed together, we recognize that in the absence of an alternative that is fully supportable or preferred, that we must identify a route that is acceptable to both parties based on the conditions and choices that are available. Enclosed with this letter is a map of the route segments that are being considered for recommendation as the preferred route for Segment 8 and Segment 9 of the Gateway West Project. The map has also been copied to CD to allow for more detailed review. Our proposal recognizes the importance of trying to avoid impacts to private property, in Owyhee, Ada and Elmore County; to keep the transmission line on public lands as much as possible; to protect cultural and visual resources; and to minimize impacts to sensitive species." The letter requested a letter of confirmation or acceptance on the route we have identified. The Commission and BLM held a meeting on the letter and proposal on February 27, 2012 and reached agreement on the proposal. The County provided the requested letter of acceptance (Enclosure 2) and hand delivered it on that date. At this point in the process, we believed we had achieved, through BLM/County coordination under FLPMA, what would normally be referred to as a "win-win" solution. The selected route, minimized the significant adverse impacts to private lands in our county, complied with Section 368 of the Energy Act of 2005 (which directed such projects be placed on federal lands and directed the amendment of land use plans if necessary for such placement), benefited raptors, and protected Sage Grouse and other species of concern from alternatives such as 9E. To our great dismay, we learned on April 27, 2012 that officials in DC were in opposition to the route through the NCA on the basis of establishing an adverse precedent for the National Landscape Conservation System. We</p>	Section 368 of the Energy Policy Act in stating that the Boise District coordinated with the County and supported the routes developed through that process. However, the NLCS staff reviewed the Agency's proposed Preferred Alternative and concluded that vegetation disturbance, including new roads, associated with additional transmission lines within the NCA would not meet the enhancement requirements of the enabling legislation for the NCA based on the proposed mitigation available at the time the FEIS was prepared. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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			<p>immediately placed a call to the BLM State Director. Our call was returned by Associate State Director Peter Ditton who advised us that "these kinds of questions and concerns come up with any project of this size." He said no decision was made as yet regarding the crossing of the NCA and that the NLCS official in question was visiting on Monday and they were going to go to the site and discuss the impact.</p> <p>We have just recently learned that the NLCS position is that the line should not follow our agreed 9D route, but should instead follow 9E. Route Segment 9E, as we indicated earlier in this letter is not preferred for reasons of impacts to species.</p>	
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	<p>At Enclosure 3 you will find Ms. Karen Steenhof's August 9, 2012 e-mail to Mr. Carl Rountree, Director, Office of National Landscape Conservation System and Community Programs. Owyhee County completely agrees with Ms. Steenhof's analysis of the lack of credible reasons to remove the route from the Birds of Prey NCA and with her analysis of the adverse impacts of proceeding with construction along Route Segment 9E. We adopt Ms. Steenhof's comment to Mr. Rountree as a portion of our comment on this matter.</p>	<p>Ms. Karen Steenhof's August 9, 2012 e-mail to Mr. Carl Rountree was considered in the BLM's review of the preferred alternative selection. A discussion of raptor habitat is included in Sections 10 and 11 of the FEIS. The studies referenced in the comment were part of the analysis for the FEIS; however, the BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared.</p>
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	<p>On the basis of the above, we are asking your involvement in correcting what will be a significant error across multiple areas of interest. A decision to replace Route Segment 9D with Route Segment 9E on the basis of NLCS concerns about the Birds of Prey NCA cannot be justified on the basis of credible science or on the basis of the establishing legislation's purposes for the Birds of Prey NCA. Furthermore, such a decision would be inconsistent with Section 368 of the Energy Act of 2005 which directed such projects to the federal lands, and did not exempt NLCS or other lands from such action. We ask you to reverse the position that has been taken by your NLCS Director and select 9D as the preferred route.</p>	<p>Your request is noted. Section 368 of the Energy Policy Act of 2005 directs federal agencies to establish energy corridors on land the agency manages. Nowhere in the section (which is quoted in full below) does it state that transmission lines must only be on federal land or that all new utility lines must be sited in the established corridors.</p> <p>"Section 368. ENERGY RIGHT-OF-WAY CORRIDORS ON FEDERAL LAND. (a) Western States- Not later than 2 years after the date of enactment of this Act, the Secretary of Agriculture, the Secretary of Commerce, the Secretary of Defense, the Secretary of Energy, and the Secretary of the Interior (in this section referred to collectively as 'the Secretaries'), in consultation with the Federal Energy Regulatory Commission, States, tribal or local units of governments as appropriate, affected utility industries, and other interested persons, shall consult with each other and shall-- (1) designate, under their respective authorities, corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land in the eleven contiguous Western States (as defined in section 103(o) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1702(o));</p>

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				(2) perform any environmental reviews that may be required to complete the designation of such corridors; and (3) incorporate the designated corridors into the relevant agency land use and resource management plans or equivalent plans. (b) Other States- Not later than 4 years after the date of enactment of this Act, the Secretaries, in consultation with the Federal Energy Regulatory Commission, affected utility industries, and other interested persons, shall jointly-- (1) identify corridors for oil, gas, and hydrogen pipelines and electricity transmission and (2) schedule prompt action to identify, designate, and incorporate the corridors into the applicable land use plans. (c) Ongoing Responsibilities- The Secretaries, in consultation with the Federal Energy Regulatory Commission, affected utility industries, and other interested parties, shall establish procedures under their respective authorities that-- (1) ensure that additional corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land are promptly identified and designated as necessary; and (2) expedite applications to construct or modify oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities within such corridors, taking into account prior analyses and environmental reviews undertaken during the designation of such corridors. (d) Considerations- In carrying out this section, the Secretaries shall take into account the need for upgraded and new electricity transmission and distribution facilities to-- (1) improve reliability; (2) relieve congestion; and (3) enhance the capability of the national grid to deliver electricity. (e) Specifications of Corridor- A corridor designated under this section shall, at a minimum, specify the centerline, width, and compatible uses of the corridor."
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	I recently learned that officials with the BLM's National Landscape Conservation System (NLCS) are opposing Gateway West Alternative 9D and are throwing their support behind Alternative 9E, an alternative that will adversely affect Greater sage-grouse populations in Owyhee County.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM's Preferred Route, Alternative 9E, largely avoids PPH for sage-grouse.
100637	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK, KAREN STEENHOF	OWYHEE COUNTY, BOARD OF COMMISSIONERS,	Our County has been engaged for several years in coordination with local BLM officials as well as with the BLM Project Manager for the Gateway West Transmission Line Project. This project proposes to route a portion of the transmission line through our county. Several of the current routes under consideration have considerable potential for adverse impact to the economic base of our county as well as to natural resources found on the federally managed lands within our county. Because of the potential for harm, we have been very engaged in seeking solutions in the form of a preferred route that had the least impacts on private lands and yet carefully avoided impacts to species of concern, primarily Sage Grouse, on the federal lands. Owyhee County, though large in total acreage, is comprised of a relatively small portion	Ms. Steenhoof's research was considered in the EIS analysis. The EIS agrees that the connectors on 500-kV lines are too far apart (19.5 feet) for a raptor to electrocute itself (Section 3.10.2.2 of the FEIS); however, the BLM concluded that the ground disturbance and new access roads associated with the proposed transmission lines would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared. A discussion of predation due to increased perching habitat is located in Section 3.11.2.2 of the FEIS. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a

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			of total acreage in private ownership in comparison to the 78% of our county which is federally owned and managed. When we reviewed the initial maps showing the proposed Route 9, which traverses much of our prime agricultural lands along the northern boundary of our county, we organized a citizens group to develop alternative routes. That group developed an alternate route which minimized the impacts to private lands by transiting the Morley Nelson Birds of Prey NCA north of the Snake River. The route we submitted re-entered Owyhee County at the most advantageous crossing, just upstream from Swan Falls Dam. While it did not completely eliminate impacts on private lands, the route was acceptable to those private land owners whose lands were crossed. That route was adopted by the County Commission and submitted to BLM. It was ultimately labeled Route 9D. A noteworthy member of the citizen's group which developed Route 9D is Ms. Karen Steenhof, a former BLM and USGS biologist who studied the impacts of the 500-kv line that was constructed across a portion of the NCA in 1981. Ms. Steenhof has lost none of her expertise regarding raptors and the purposes of the NCA and she has remained firm in her conviction to remain active in raptor conservation. She was instrumental in helping craft a route that would achieve the county's goals of preserving private property and the county economy, while also achieving conservation goals regarding species of concern. Ms. Steenhof's analysis was that the placement of 9D within the NCA would be beneficial to raptors, rather than adverse to the purposes of the NCA.	consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100644	ROBYN C THOMPSON		I am writing in regards to the Gateway West Transmission Line Project Segment 9. Segment 9D has 100% backing of Owyhee County citizens, Commissioners, State Representative, Governor Otter, and our 1st Congressional District. Choosing 9D would put the BLM in compliance with section 368 of the 2005 Energy Act. Also Segment 9D follows an existing 138 KV line and a brand new road built with Obama stimulus money. The environmental impact is already there.	Your preference for Alternative 9D has been noted. As stated in the FEIS, it was determined that the other alternatives through the NCA did not meet the enhancement requirements of the enabling legislation as proposed at the time the FEIS was published. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100644	ROBYN C THOMPSON		Segment 9E has been significantly altered, violating the NEPA process.	It is standard practice to collect information between draft and final and make adjustments to alternatives. These changes are presented to the public in the FEIS for comment. The reason for the change is presented in section 1.1.1 of the FEIS. This is completely consistent with the NEPA process.
100644	ROBYN C THOMPSON		Segment 9 is totally unacceptable, invading our private property, homes, agriculture economy and way of life.	Your opposition to Segment 9 is noted. Alternative 9E, which is part of the BLM's Preferred Route, crosses slightly less agricultural land than Alternative 9D, the route the County prefers (1 acre vs. 2). Neither route is within 1,000 feet of a residence. Both alternatives cross the same amount of private land, 3.3 miles.
100646	NELDA WILLIAMS		Alright, your proposed route that has been changed back to the original runs very close to our little school in Arbon Valley. It also runs over the top of a power line that feeds a pump where we pump water to irrigate. It also goes over the top of electric fences and it feeds power into these fences and also into that smaller power line. It's a very very dangerous situation.	The preferred route does not cross near the Arbon Valley School; the preferred route follows 5B/7B, which is several miles to the south of the school. Stray voltage is discussed in Section 3.21. The line analyzed in the FEIS is based on indicative engineering. Final design has not been completed. Note that the County is the

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				permitting authority for private land in Idaho, not the BLM. Setbacks on private land would be a county zoning issue. The BLM has no authority to require setbacks on non-federal land.
100647	NELDA WILLIAMS		You are within a very few feet of our little school here in Arbon Valley.	This statement is not correct. Unlike Alternative 5A/7A, the proposed route does not cross near the Arbon Valley School, it follows 5B/7B, which is several miles to the south of the school. In any case, final siting will follow all safety and permitting requirements. Siting on private land will involve coordination between the Proponents, county, and landowners. The County is the permitting authority for private land in Idaho, not the BLM.
100647	NELDA WILLIAMS		You are over the top of a smaller powerline that feeds an electric pump to irrigate. You are over the top of an electric fence and this high-powered line feeds power into those lines believe it or not and it will put a lot more power into that electric fence and we have killed colts.	It is not clear that the comment refers to the Preferred Route, given the preceding two comments. In any case, the analysis in the FEIS is based on indicative engineering. Final siting will follow all safety and permitting requirements. Note that the County is the permitting authority for private land in Idaho, not the BLM. The EIS agrees that stray voltage and electric shocks can cause problems under certain circumstances. These issues are discussed in Section 3.21.
100648	LYMAN BELNAP, C DALE WILLIS JR	SNAKE RIVER RANCH, LLC	Our firm has been retained by Snake River Ranch, LLC and its owners to assist in challenging the Bureau of Land Management (BLM) Proposed Alternative with Segment 8B of the Gateway West Transmission Line Project. We are attaching a copy of our client's previous letter directed to you on October 17, 2012, and propose the following for your consideration: 1. Please delay (for 1 year minimum) the Final EIS statement from being released later this month. More time is needed to have effective collaborative discussion among impacted property owners, BLM, Idaho Power and all elected officials. As you know, the above parties went through such an exercise in 2009 and came to a consensus. You can review the Gateway West Transmission Line Project website for further information on the final report.	The FEIS was released in April 2013. The BLM intends to continue to work with local interests in determining the most appropriate solution. Refer to Chapter 2 of the FEIS and Dear Reader letter for further information regarding the BLM's approach for this section of the Project. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100648	LYMAN BELNAP, C DALE WILLIS JR	SNAKE RIVER RANCH, LLC	The negative impact from power lines being constructed through our clients' property includes: (a) the destruction of their ability to farm and ranch the property efficiently and effectively; (b) the location of power lines directly above a cattle sale barn, shop, 3 houses, and a 12,000/sq. foot dwelling; (c) the destruction of any ability to develop the parcel into the proposed beautiful residential Master-Plan Community next to the Snake River (see attached Master Plan proposed in 2008-09 to the county); and (d) rendering the property unmarketable either as farm/ranch ground or a potential development property.	The analysis in the FEIS is based on indicative engineering. Final siting will follow all safety and permitting requirements. Siting on private land will involve coordination between the Proponents, county, and landowners.
100648	LYMAN BELNAP, C DALE WILLIS JR	SNAKE RIVER RANCH, LLC	In effect, if Mr. Roundtree's recommendations are followed, it will result in tens of millions of dollars of damages to our clients - damages they are not willing to suffer. 4. Finally, our clients will not be permitting anyone (BLM or Idaho Power officials or any contractors) to enter upon their property.	The effect on property values is discussed in Section 3.4.2.2. The BLM has no need or intention of entering private property for this Project.

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100648	LYMAN BELNAP, C DALE WILLIS JR	SNAKE RIVER RANCH, LLC	We look forward to your cooperation in delaying the Final EIS and recommending that Mr. Rountree and his committee reconsider the decision to make Segment 8B as the BLM Preferred Route. Furthermore, we strongly suggest that you consider as the Preferred Route the route through the Morley Nelson Birds of Prey previously agreed upon among property owners, governmental officials, BLM and Idaho Power officials after many months of private and public meetings.	Your preference for routing the line through the SRBOP is noted. Please refer to discussions in the FEIS for the reasons why the BLM did not select the routes through the NCA as its preferred route. The FEIS was released in April 2013. The BLM intends to continue to work with local interests in determining the most appropriate solution. Refer to Chapter 2 of the FEIS and Dear Reader letter for further information regarding the BLM's approach for this section of the Project.
100649	ROBERT FLOOD		I was recently notified that your Washington Office reversed a decision of your local office in Boise, Idaho concerning the Power Transmission Line known as the Gateway project. It is very disappointing to hear that those located in D.C. would even think of overriding a plan that had been through a 3 1/2 year process involving the BLM, Conservationist, The power utilities, local state government, local farmers and landholders. A decision that negatively impacts so many people versus the plan that had been worked out by the committee makes me lose confidence in your process. I understand the 2005 energy act and also the purpose of the BLM is to protect the environment and the citizens of the U.S.A. The committee that made the original decision, using all the data available, concluded that the path they choose would have the least impact on the environment and also the least impact on the local communities. It is my hope you reverse your position and trust the local people who made the original decision.	As stated in the FEIS (Section 2.4.1.1), the BLM concluded that the proposed mitigation and EPM measures provided for the Proponents' Proposed Route for Segment 8 and other Alternatives for Segment 9 that crossed the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100652	W GREG NELSON	CITY OF KUNA	I am writing to further protest the BLM's re-alignment of the Gateway West project from the far northern portion of the Morley Nelson Snake River Birds of Prey National Conservation Area (Route 8) to the southern portion of the City of Kuna (Route 8B). The negotiated, accepted and preferred (Route 8) was chosen after extensive hearings, meetings and considerable expense by all parties involved, and it is extremely unsettling for a non-involved group to summarily override the decision based upon speculation and assumptions. In my last letter I included the reasons Route 8 was chosen and this included compatibility with the 482,000 acre NCA. Because definitive maps had yet to be released I incorrectly identified Route 8 as Route 8C.	Your opposition to the BLM's selection of Alternative 8B as the Preferred Route is noted. As stated in the FEIS (Section 2.4.1.1, as well as in Section 3.17, and Appendix F-1), the BLM found that the proposed mitigation and EPM measures provided for the Proponents' Proposed Route for Segment 8 and other Alternatives for Segment 9 that crossed the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM intends to continue to work with local interests in determining the most appropriate solution.
100652	W GREG NELSON	CITY OF KUNA	In 2009, the City of Kuna was requested to put together an economic impact white paper on alternate Route 8B and this impact paper was, and still is, a pretty dose estimate as to the costs such placement would have on Kuna. The assumptions were based upon eliminating all housing, businesses and other uses within 660 feet of the centerline as well as adversely affecting property values by 10% between the 660ft. and 1,000 ft. Further assumptions were that the route would severely affect the 15-year build out time-frame for the impact area. Even though a 15 year time frame was chosen for build out of the impact area, the slowdown of the economy doesn't lessen the impact; it only pushes the time frame out past the 15 year timetable. The losses would	The economic evaluation provided to BLM by the City of Kuna is presented in Section 3.4.2.3 of the FEIS. The paper's conclusions are based on the assumption that there would be no businesses, houses, or other uses within 660 feet of the centerline (a 1,320-foot-wide strip of land). History does not support this assumption. The ROW would extend 125 feet on each side of the center line (a 250-foot-wide strip). Housing, business, and other uses typically occur along the edge of ROWs, as can readily be observed in both urban and rural areas of Idaho and across the country. Grazing and agriculture typically continues within and adjacent to the ROW (see Appendix K to the FEIS).

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			<p>be approximately the same to the taxing districts involved in the 8B alternative location of the transmission line. Inflation and increases or decreases in tax rates were not a part of the analysis.</p> <p>The following is a breakdown of the white paper analysis: [table below formatted as follows: Topic -- Annual/Year -- Total] 1.Loss of property tax or property tax valuation -- \$2,327,980.53 -- \$,919,707.00 2.Residential Building permits losses -- \$1,361,268.00 -- \$20,419,020.00 3.Commercial Building permit losses -- \$111,100.00 -- \$1,666,500.00 4.Residential Utility billing losses -- \$610,488.00 -- \$9,157,320.00 5. Commercial Utility billing losses -- \$211,200.00 -- \$3,168,000.00 6. School Building permit losses -- \$13,333.00 -- 199,995.00 7. Church Building permit losses -- \$13,255.00 -- \$198,825.00 Annual adjusted estimated losses (2009) -- \$4,648,624.53 -- \$69,729,367.00. If the 2009 figures are approximately correct, then the 2012 figure would be the 2009 figures plus the 3,830 city limits acreage with an assessment of three Equivalent Dwelling Units (EDUs) per acre to fund the new city wastewater treatment plant 3 EDUs per acre= \$6,581,217.00. The total cost to the city for moving the 500KV Gateway West Transmission Line into the Kuna City Limits and Kuna City impact zone would be approximately \$76,310,584.00</p> <p>It would appear that the National Landscape Conservation System made their determination without much review and any discussions with those that have invested 3 1/2 years studying and recommending the preferred Route 8. I am sure there was no consideration given by this group on the impacts to private property or to the effects to the City of Kuna or the City of Melba. We in this area recognized the importance of the electrical grid and the role this transmission line will play in our Nation's future, but we also recognize that summarily moving the line to satisfy a bureaucratic whim makes the BLM's NEPA and EIS responsibilities seem pointless.</p>	
100652	W GREG NELSON	CITY OF KUNA	<p>We would again invite those in the Washington D.C. area who made the 8B decision to a tour and briefing of our area to acquaint them with the NCA and its overall compatibility with power lines and we would expect, armed with the correct information, the Preferred Route 8 would be re-established.</p>	<p>Senior staff from the BLM's Washington office did meet with local officials in the NCA to review the issues involved. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.</p>
100654	BRENDA RICHARDS	OWYHEE INITIATIVE	<p>On behalf of the Owyhee Initiative Board of Directors, I am writing to highlight our concerns with the potential impacts of the preferred alternative routes for the Gateway West Transmission line in Owyhee County, Idaho and to recommend a path forward to properly siting this route. The Owyhee Initiative (OI) is a collaborative group consisting of national, regional, and local stakeholders working to promote the ecological and economic health within Idaho's Owyhee County. We note that the Omnibus Bill of 2009 included both the Owyhee Initiative</p>	<p>Your concerns about the BLM's Preferred Route are noted. The BLM is continuing to work with local interests to resolve issues. Refer to Section 2.4.1.1 for the reason that Alternative 9D was not preferred. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.</p>

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			Implementation Act and the National Landscape Conservation System Act. Aspects of both are relevant to Owyhee Initiative Board of Directors. Finding an acceptable route for the Gateway West Transmission Line requires BLM to carefully consider multiple issues ranging from sage-grouse conservation to private property interests and consistency with the new National Conservation Area guidelines. We believe that a further discussion is needed on how to design an acceptable alternative before the project proceeds. We recommend that the BLM temporarily pause the permitting process and convene a collaborative effort to address these concerns. We believe that this additional time will ensure that the Gateway West Transmission Line is properly sited and that the impacts are properly avoided, minimized and mitigated.	
100655	MERRITT THORNHILL		I am in Complete Opposition of the Gateway West Transmission Line Project. My wife and I moved here in 1997. I lost my wife 7 years ago and her remains are in the route in which you are proposing. Just a mile and a half away you have an existing Transmission Corridor which has already destroyed the land and surrounding area in its path.	Your opposition to the project is noted. The Agency's preferred routing for Segment 5 is to the north of your location. Your comment appears to refer to a route that was not selected. Alternative 5D (which contains the map node 5j) was not selected as the Preferred Alternative due to concerns about impacts to farmland, residences, and bald eagle nesting. The route was kept as a feasible alternative but is not currently being considered as the preferred route.
100655	MERRITT THORNHILL		When I learned about the Gateway West Transmission Line Routes 5J and 5D, I was dismayed because the current suggested route 5J would run within a couple hundred feet of my home thereby eliminating the any value of my property, the wildlife, the eagles. This location would also create electrolysis that is harmful to anyone's health. I have a contract to sell my property currently in place. Your initial plan could jeopardize this contract which I would then hold you responsible for my loss.	Alternative 5D (of which 5j is a map node) is considered a feasible alternative but is not the Preferred Alternative being considered for permitting by the BLM. As is stated in Section 2.4.6.3 of the FEIS, Alternative 5D was originally the Proponents' Proposed Route but was changed to a feasible alternative when concerns over impacts to agriculture, residences, planned development, and raptor resources resulted in the Proponents shifting their Proposed Route to the east. The BLM selected the Proposed Route, incorporating Alternatives 5B and 5E as the Agency Preferred Route.
100655	MERRITT THORNHILL		The planning staff should be embarrassed that the location they chose is in a sensitive Bald Eagle Flight Path as well as a historic dam and structure located on Indian Springs just to the east. The wildlife concerns as well as the environmental concerns are paramount to such a project and has obviously been overlooked or swept under the rug this far.	It appears that this comment refers to 5D. Alternative 5D (of which 5j is a map node) is considered a feasible alternative but is not the Preferred Alternative being considered for permitting by the BLM. As is stated in Section 2.4.6.3 of the FEIS, Alternative 5D was originally the Proponents' Proposed Route but was changed to a feasible alternative when concerns over impacts to agriculture, residences, planned development, and raptor resources resulted in the Proponents shifting their Proposed Route to the east. The BLM selected the Proposed Route, incorporating Alternatives 5B and 5E as the Agency Preferred Route.
100655	MERRITT THORNHILL		The planning staff should be embarrassed that the location they chose is in a sensitive Bald Eagle Flight Path as well as a historic dam and structure located on Indian Springs just to the east. The wildlife	It appears that this comment refers to 5D. Alternative 5D (of which 5j is a map node) is considered a feasible alternative but is not the Preferred Alternative being considered for permitting by

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			concerns as well as the environmental concerns are paramount to such a project and has obviously been overlooked or swept under the rug this far.	the BLM. As is stated in Section 2.4.6.3 of the FEIS, Alternative 5D was originally the Proponents' Proposed Route but was changed to a feasible alternative when concerns over impacts to agriculture, residences, planned development, and raptor resources resulted in the Proponents shifting their Proposed Route to the east. The BLM selected the Proposed Route, incorporating Alternatives 5B and 5E, as the Agency Preferred Route.
100658	KATHY PHELPS		First and foremost I am in complete opposition of the Gateway West Transmission Line Alternative Routes	Your opposition to the Gateway West Transmission Line Alternatives is noted. While it is not stated, it is assumed, by your address, that the Alternative most concerning you is Alternative 5D; this route was not part of the preferred route. However, we note that the 2-mile study corridor for the Preferred Route may also be within your area of concern.
100658	KATHY PHELPS		My husband and I moved here in 1994 to enjoy our retirement. Just a mile and a half away you have an existing Transmission Corridor which has already destroyed the land and surrounding area in its path. Have you thought about just using what you have?	It appears that this comment is referring to the route through the Fort Hall Indian Reservation. See Chapter 2, section 2.4.1.1 for reasons why a route through the Fort Hall Indian Reservation cannot be selected.
100658	KATHY PHELPS		When I learned about the Gateway West Transmission Line Routes 5J and 5D, I was dismayed because the current suggested route 5J would run within a few hundred feet of our home thereby destroying the value of our property and the quality of life we have here. The type of proposed transmission line creates a electrical current at the ground surface that is documented that creates health issues. Both the visual and noise pollution this type of line creates is not desirable in a residential area.	It appears that this comment refers to 5D. Alternative 5D (of which 5j is a map node) is considered a feasible alternative but is not the BLM's Preferred Alternative. As is stated in Section 2.4.6.3 of the FEIS, Alternative 5D was originally the Proponents' Proposed Route but was changed to an alternative when concerns over impacts to agriculture, residences, planned development, and raptor habitat resulted in the Proponents shifting their Proposed Route to the east. The BLM selected the Proposed Route, but incorporating Alternatives 5B and 5E, as the Agency Preferred Route. The EIS agrees that stray voltage and electric shocks can cause problems under certain circumstances. These issues are discussed in Section 3.21.
100658	KATHY PHELPS		The type of proposed transmission line creates a electrical current at the ground surface that is documented that creates health issues. Both the visual and noise pollution this type of line creates is not desirable in a residential area	Impacts from electromagnetic current and potential human health effects are discussed in Sections 3.21 and 3.22 of the FEIS. The EIS agrees that stray voltage and electric shocks can cause problems under certain circumstances. As shown in Figure 3.21-4, the electric field generated by a 500 kV transmission line falls to near zero at the edge of the ROW.
100658	KATHY PHELPS		Please note that the Cold Creek/ Warm Creek area is a documented Bald Eagle nesting and flight path. Your planning staff should not have overlooked this sensitive wildlife concern.	Effects to raptors are disclosed in Section 3.10 of the FEIS. The EIS did not overlook the issue. The line will be consistent with the avian protection plan approved by the USFWS.
100658	KATHY PHELPS		The few sage hens we have here are sure to be jeopardized with the disturbance this line will permanently cause.	Please refer to the Sage-Grouse analyses provided in Appendix J of the FEIS.
100659	LARGE GROUP, NAMES LISTED IN FOOTNOTE 1		By refusing to change the currently proposed BLM Preferred Route hundreds of millions of dollars in damages will occur and victimize private property owners, counties, and cities. Do we no longer have a voice as property owners in the greatest country in the world? Please	AS NEPA requires, public input was sought. Throughout the development of the EIS, the BLM held meetings and informational events as well as sought input from local citizens and governments. The BLM worked with local groups to develop

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			permit us to maintain the freedoms that permit private property ownership, and maintain the economic welfare of individuals who are sustained and earn a living by maintaining our beautiful farms, ranches, and dairies. Collectively we urge the release of the Final Draft be delayed until a workable solution has been achieved by the BLM, IP, Elected Officials, and hundreds of concerned citizens. PLEASE STOP AND LISTEN TO OUR CONCERNS!	route alternatives and assess resource and economic concerns. In response to concerns from farmers in Idaho, we hired an independent agricultural specialist. His assessment of the impacts to agriculture are found in Appendix K to the FEIS, as well as in Segments 3.4 and 3.18. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100659	LARGE GROUP, NAMES LISTED IN FOOTNOTE 1		Enclosed are additional statements from many concerned property owners seriously affected by the proposed BLM Preferred Alternative Route (Segment 8B) of the Gateway West Transmission Line Project. Each person has noted they are seriously displeased, disappointed, and angry because after working closely with local officials at the BLM and Idaho Power for years it appears they have wasted their time. Commencing in 2008, a total collaborative effort was made by the private land owners, citizens, elected officials (local, county, and state), and the local BLM and Idaho Power officials to achieve a workable solution for locating 500KV transmission lines through the Morley Nelson Birds of Prey (NCA). In fact, it was shown on the Gateway West Transmission Line website as the preferred route until recently.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Proposed Route for Segment 8, which crosses through the of the SRBOP, were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests on a consensus route.
100661	MICHAEL GARNER	HEGLAR CREEK FARMS	The proposed line would be located nearly over the top of an existing GPS base station. The base station is solar powered, sending correctional signal throughout the valley to 6 farms covering in excess of 20,000 acres. Many of the Farmers have expressed deep concern with the proposed transmission line, and it's probable interference with the correctional signal. The base station is located at N42 degrees 31.214 W113 degrees 16.013 The location of the base station cannot be moved to service the terrain that it covers. I have talked with an Electrical Engineer and asked what would happen to the signal if a transmission line of the proposed size was installed. The answer was that the signal could be affected at random times for no reason. With the probability that the signal could be affected at any time is a very big concern. GPS in Agriculture is important, effective, and a vital part of our crop production. We can't afford the possibility of interference with the correctional signal. We also believe that other routes for transmission lines would have no impact on production agriculture.	The centerline analyzed in the FEIS is approximate for the purposes of determining relative effects of the projects between alternatives. Final siting on private/county/state land will occur in conjunction with interested parties and in compliance with all permits and regulations. Refer to Section 3.21 and Appendix K for information on effects to GPS.
100662	LAMAR ISAAK		We have seen some preliminary plans of the blm And are confused why you would try to cross the coridor lines to go north of the coridor. When in some ways going south of the coridor makes more sense and less impact to the ferry hollow drainage which winters deer elk pheasants and a few grouse. In regards to what it means to me we have landin both positions on the ms you will see Duane and Lamar. Martin bracket trust my wife's family bulholz and Lamar plain. I would like to visit with you I am not an opponent I nknow. We need the power lines I just want it to go where it least impacts the wildlife I so appreciate. the north route that goes east to the substation definitely would impact are wildlife more than on the south. Side of the coridor	This comment appears to refer to Alternative 5E of Segment 5, which is part of the Preferred Alternative. Alternative 5E, part of the County's preferred route, is north of the existing transmission line, adjacent to the edge of the existing ROW (not separated by 1,500 feet as the Proponents propose). The BLM included this portion of the County's alternative as part of its Preferred Alternative, assuming that reliability issues can be worked out, because it is nearly all on private land and the BLM only makes decisions for federal land. See Section 2.4.1 in the FEIS.

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100667	DOUG STURGES	CITY OF MELBA	The City of Melba would like to express our deep concerns about the recently published preference of the Bureau of Land Management to build the Gateway West Transmission Line through the northern boundary of the Melba Area of City Impact. It would be difficult to overstate the negative impact this preference would have on the current and future growth and development of our City, shown as Route 8B on the maps. It is likewise very disappointing to see the blatant disregard for the hundreds of hours and much effort spent in formulating the alternative proposal submitted by Idaho Power and supported by our local citizens and officials. As proposed, the 500K volt line would traverse the south side of Melba Road, which is located just one quarter mile from the current City limits. Because of the geographical layout of the city, the natural growth area for the town will predominately be to the north and west, directly in the path of the proposed transmission line. Not only would this greatly limit the town's future growth	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Proposed Route for Segment 8, which crosses through the of the SRBOP, were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100667	DOUG STURGES	CITY OF MELBA	but it will almost certainly have a negative impact on the property values of land and home owners in the area without compensation for any such loss	Impacts to property values are discussed and evaluated in Section 3.4.2.2 of the FEIS.
100667	DOUG STURGES	CITY OF MELBA	The aesthetics and quality of life that draw people to live in the Melba community will be lost.	Impacts to property values are discussed and evaluated in Section 3.4 of the FEIS.
100667	DOUG STURGES	CITY OF MELBA	After countless meetings, discussions and studies over the past several years, Idaho Power proposed a corridor for the new transmission line that would parallel an existing 500K transmission line across the northern area of the Morely Nelson Birds of Prey National Conservation Area. Given the nature of the project, this would be an appropriate use of public lands, and as shown in various studies would not unfavorably impact the mission of the conservation area.	Your preference for routing the Gateway West Transmission Line through the SRBOP/NCA is noted. The BLM found that the mitigation measures supplied by the Proponents at the time of the FEIS publication did not sufficiently offset the negative impacts of constructing a transmission line in the NCA to a level where it would comply with the NCA enabling legislation. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100667	DOUG STURGES	CITY OF MELBA	The most insensitive part of BLM's decision is that it seems to ignore the concerns and impact on the people that live along their preferred corridor. The City of Melba will continue to stand against this intrusion of the people of the Melba community and work with the City of Kuna, Ada County, Canyon County, the State of Idaho as well as our Federal Representatives in Congress, to return the Gateway West Transmission Line to the previously negotiated route through the northern portion of the Morely Nelson Birds of Prey Nation Conservation Area.	The BLM did not ignore the concerns of local citizens or the city. The BLM worked cooperatively with the City and the County to find consensus. However, as stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Proposed Route for Segment 8, which crosses through the the SRBOP, were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100669	GUY BOURGEOU, WENDY CORNWELL, ERIC FORSGREN, CRAIG MOORE,		PLEASE DO THE RIGHT THING! The "Gateway West" transmission line placement should be changed back to the State PREFERRED ROUTE!!!! As a concerned property owner within the corridor area recently proposed to be arbitrarily amended in the final EIS Draft for the Gateway Transmission Line Project, I/we demand the	Your opposition to the BLM's Preferred Route in Ada, Canyon, and Owyhee Counties is noted. As stated in the FEIS (Section 2.4.1.1, as well as in Section 3.17, and Appendix F-1), the BLM found that the proposed mitigation and EPM measures provided for the Proponents' Proposed Route for Segment 8 and other

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	BRANDON SCHMECKPEPER, CHRIS STEWART, BECKY STEWART, MICHAEL STUKEL, JERRY SWORD, RAMONA SWORD, WILLIAM TIPPETTS, C DALE WILLIS JR		collaborated routes, which were found in the Preliminary EIS Draft be reinstated, to go through The Morley Nelson Snake River Birds of Prey (NCA), instead of the beautiful private lands in Ada, Canyon, and Owyhee Counties. Why should I/we suffer the consequences of individuals that are not an integral part of our community? Please do not allow the proposed transmission lines to ruin our private property along with our beautiful established communities. Our livelihood for farming, dairy farming, ranching, and development opportunities are at stake for the rest of this century and beyond.	Alternatives for Segment 9 that crossed the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100670	NADA CULVER, BRIAN O'DONNELL, JOHN ROBISON, WILL WHELAN	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, THE NATURE CONSERVANCY OF IDAHO, CONSERVATION LANDS FOUNDATION	Conflict with National Conservation Area A number of the potential transmission line routes (notably routes 9, 9D, 9Ea and 9F) would cross portions of the Morley Nelson Snake River Birds of Prey NCA, a unit of the National Landscape Conservation System (Conservation Lands). The National Landscape Conservation System was established “in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” National Landscape Conservation System Act, 16 U.S.C. § 7202(a) (2009). Secretarial Order 3308 speaks to the management of the Conservation Lands, stating that “BLM shall ensure that the components of the NLCS are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.” The 15-Year Strategy for the Conservation Lands reinforces this by stating the “conservation, protection, and restoration of the NLCS values is the highest priority in NLCS planning and management, consistent with the designating legislation or presidential proclamation.” Conservation Lands Strategy at 8. As conservation of natural and cultural resources is the principal mandate for BLM management of the Conservation Lands, the agency must diligently protect these areas from damage from new infrastructure projects, including transmission lines. Recent BLM policy guidance specifically addresses the management of BLM-managed national monuments and NCAs and creates a presumption that BLM will not approve new rights-of-ways (ROW) in these areas. Specifically the manual provides: 5. To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designating or authorizing use of transportation or utility corridors within NLCS units. To that end, and consistent with applicable law, when developing or revising land use plans addressing NLCS units, the BLM will consider: a. designating the NLCS unit as an exclusion or avoidance area; b. not designating any new transportation or utility corridors within the NLCS unit if the BLM determines that the corridor would be	The BLM Preferred Alternative crosses the NCA in or near designated utility corridors. The BLM determined that mitigation measures and EPMs could meet the enhancement requirements of the NCA for these portions of the Preferred Routes in the NCA. Additional mitigation measures are also being developed by the Proponents in order to further meet the enabling legislation of the NCA. Conversely, the BLM determined that the other, much longer, routes proposed within the NCA would not meet the legislation, based on the mitigation offered at the time the FEIS was completed (see section 2.4.1.1 of the FEIS). The issue is not that 500 kV transmission lines would harm the raptors; studies of the NCA have not shown this to be the case (e.g., Engel et al.; Steenhof et al.). The concern involves the level of disturbance and new roads associated with construction of the lines. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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			incompatible with the designating authority or the purposes for which the NLCS unit was designated; and c. relocating any existing designated transportation and utility corridors outside the NLCS unit. BLM Manual 6100, § 1.6J(5). The law establishing the Snake River Birds of Prey NCA includes specific provisions addressing allowable uses of the NCA. The key provision directs the BLM to identify “levels, types, timing, and terms and conditions for the allowable nonmilitary uses of lands within the conservation area that will be compatible with the protection, maintenance, and enhancement of raptor populations and habitats and the other purposes for which the conservation area is established.” 16 U.S.C. § 460iii-3(b)(7) (emphasis added). These “other purposes” include “the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.” 16 U.S.C. § 460iii-2(a)(2). Thus, only those proposed actions that would “protect, maintain, and enhance” the purposes of the NCA are permissible. Transmission line development causes serious impacts, including direct damage to wildlands, wildlife habitat and cultural resources; interference with scenic vistas; habitat fragmentation; and others. Consequently, transmission lines are generally incompatible with management of the Conservation Lands absent a specific showing of how such a project would “protect, maintain, and enhance” the raptors, raptor habitat and the other purposes for which the NCA was designated.	
100670	NADA CULVER, BRIAN O'DONNELL, JOHN ROBISON, WILL WHELAN	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, THE NATURE CONSERVANCY OF IDAHO, CONSERVATION LANDS FOUNDATION	Need for a creative solution We appreciate the difficulty of the agency's position in finding a viable alternative. In light of the serious concerns raised by the routes discussed above, we believe there is a need to evaluate creative solutions that meet the BLM's policies and mandates for the Morley Nelson Snake River Birds of Prey NCA and greater sage-grouse habitat. Due to the multiple resource conflicts with proposed routes, especially those in Segment 9, a variety of options should be considered, such as possibly limiting the proposal to one transmission line through this segment (instead of two parallel lines), which could ultimately result in a workable solution.	Your proposal of additional routing alternatives is noted. Chapter 1 of the FEIS states the Purpose and Need for the proposed project. Sections 1.3.5 and 1.3.6 discuss current system constraints and the purpose of the proposed action, including discussion of each segment's purpose (see Section 1.3.6.2 of the FEIS). The BLM will continue to work with local stakeholders on these issues. Note that the BLM has been working on this project for several years and has looked at numerous options.
100670	NADA CULVER, BRIAN O'DONNELL, JOHN ROBISON, WILL WHELAN	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, THE NATURE CONSERVANCY OF IDAHO, CONSERVATION LANDS FOUNDATION	[Footnote 1: The Idaho Governor's Sage-grouse Task Force has also identified the habitat at risk from the Gateway West lines as part of the Important Habitat Zone, in which a ROW could only be established if it “cannot reasonably be achieved, technically or economically, outside of this management zone.”] cc: Steve Ellis, Idaho State Director Carl Rountree, Director, National Landscape Conservation System	The Governor's Task Force conclusion has been considered by the agency, see Section 3.11.

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100670	NADA CULVER, BRIAN O'DONNELL, JOHN ROBISON, WILL WHELAN	IDAHO CONSERVATION LEAGUE,THE WILDERNESS SOCIETY,THE NATURE CONSERVANCY OF IDAHO,CONSERV ATION LANDS FOUNDATION	Consequently, transmission lines are generally incompatible with management of the Conservation Lands absent a specific showing of how such a project would “protect, maintain, and enhance” the raptors, raptor habitat and the other purposes for which the NCA was designated. The BLM has not provided analyses that demonstrate this standard has been met for the Gateway West line	The Agency Preferred Route avoids the NCA in most cases. The crossing of the NCA in Segment 8 occurs in an established corridor and conforms the SRBOP RMP requirement of restricting new transmission lines to the designated corridors. The Preferred Route for Segment 9 crosses the NCA in two locations, at the eastern edge and near Murphy. Near Murphy, the line is within or adjacent to the established corridor; while in the eastern portion, the route was diverted to the south in order to avoid specific resources. Alternatives to the Preferred Routes in Segments 8 and 9 that were primarily within the NCA were not selected due to concern over consistency with the enabling legislation. It was felt that mitigation measures and siting location of the section in the eastern portion of the NCA that does not fall within the designated corridor could sufficiently mitigate impacts in this section as to continue to comply with the enabling legislation.
100670	NADA CULVER, BRIAN O'DONNELL, JOHN ROBISON, WILL WHELAN	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, THE NATURE CONSERVANCY OF IDAHO, CONSERVATION LANDS FOUNDATION	Conflict with Greater Sage-grouse Habitat BLM's alternative route 9E would pass through identified Preliminary Priority Habitat (PPH) for the greater sage-grouse. Currently, the U.S. Fish and Wildlife Service has found the greater sagegrouse warrants protection under the Endangered Species Act and has committed to a final listing decision in 2015; BLM is in the process of rangewide planning to design conservation measures and regulatory mechanisms that would avoid listing. BLM's Instruction Memorandum (IM) 2012-043 “provides interim conservation policies and procedures to the Bureau of Land Management (BLM) field officials to be applied to ongoing and proposed authorizations and activities that affect the Greater Sage-Grouse (<i>Centrocercus urophasianus</i>) and its habitat.” PPH, as identified in BLM's Greater Sage-Grouse Interim Management Policies and Procedures, IM 2012-043 (12/27/2011), “comprises areas that have been identified as having the highest conservation value to maintaining sustainable Greater Sage-Grouse populations” that “have been identified by the BLM in coordination with respective state wildlife agencies.” For pending projects in PPH (including those for which a Draft EIS has been issued and would likely have more than minor adverse effects on sage-grouse), the IM provides that the agency must: - Ensure that reasonable alternatives for siting the ROW outside of the PPH or within a BLM-designated utility corridor are considered and analyzed in the NEPA document. - Identify technically feasible best management practices, conditions, etc. (e.g., siting, burying powerlines) that may be implemented in order to eliminate or minimize impacts. (emphasis added) IM 2012-043 requires additional procedures for pending right-of-way applications that would affect more than one linear mile of sage grouse habitat. Segment 9E would have nearly fifty times that level of impact. These procedures include a high-level	Alternative 9E was revised between draft and final (see Section 1.1.1 in the FEIS) to avoid crossing PPH; the route analyzed in the FEIS would result in 7 acres of disturbance to PPH during construction, with 2 acres of permanent disturbance due to operations and maintenance activities. Mitigation measures are provided in the FEIS; additional measures are being developed.

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			interagency review process for any right-of-way project that would fail to “cumulatively maintain or enhance sage-grouse habitat.” The sage-grouse habitat that will be affected by proposed project routes has been acknowledged by both BLM and the State of Idaho [Footnote 1] as important for protection. Allowing development of a large transmission line through this landscape could result in harmful, and potentially irreversible impacts to important greater sage-grouse habitat, both by damaging sage-grouse habitat through the construction and maintenance of power lines and by providing “perches” for raptors and other birds of prey to more easily prey on sage-grouse. The U.S. Fish and Wildlife Service has found that transmission lines have a range of adverse impacts on sage grouse and their habitats. 75 Fed. Reg. 13909, 13928-29 (March 23, 2010). The Service’s 12-month finding on sage grouse noted the many transmission line proposals pending in the western states and explained “If these lines cross sage grouse habitats, sage grouse will likely be negatively affected.” Id at 13929. More recently, the BLM’s Sage-grouse National Technical Team reached the same conclusion and recommended that the BLM “[m]ake priority sage-grouse habitat areas exclusion areas for new [right-of-way] permits” with narrow exceptions. Id.	
100670	NADA CULVER, BRIAN O'DONNELL, JOHN ROBISON, WILL WHELAN	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, THE NATURE CONSERVANCY OF IDAHO, CONSERVATION LANDS FOUNDATION	Consequently, transmission lines should be avoided in PPH, and the BLM has not made the requisite findings or considered measures to avoid or offset damage to the habitat that would be affected by this project. Although newly developed Alternative 9Ea would not cross directly into PPH, it would run immediately adjacent to PPH and would affect sage grouse within PPH. If this route receives further consideration, BLM must disclose these impacts and consider mitigation measures, including offsite mitigation. Need for a creative solution We appreciate the difficulty of the agency’s position in finding a viable alternative.	The Alternative 9E route was revised in to avoid PPH to the extent practicable. Road improvement associated with the route would impact approximately 7 acres of PPH during construction.
100671	STEPHEN GOODSEN, CL "BUTCH" OTTER	STATE OF IDAHO, OFFICE OF THE GOVERNOR	Mr. Secretary, I understand the need to move expeditiously for the sake of a necessary transmission project. However, the state, local officials and citizens of Idaho have a substantial interest in the placement of this transmission line and it is imperative that BLM decision makers receive additional input as soon as possible. In particular, it is important to discuss the preferred alternative routes for segments 8 and 9, which significantly infringe on private property in Idaho. The BLM did not include a designated preferred alternative in the draft Gateway West Environmental Impact Statement (EIS). Instead, it directed interested stakeholders to work together in determining the “correct” route. Despite the state’s objection to the absence of a preferred alternative in the draft EIS, state agencies, local governments, citizens of Idaho, state and local BLM staff, and staff from the Morley Nelson Birds of Prey National Conservation Area participated in a successful, collaborative effort to identify and propose a consensus route. Ultimately, BLM	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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			headquarters chose to disregard these collaborative efforts and selected preferred alternative routes that do not have the support of the state, local communities, or state and local BLM staff. In so doing, BLM headquarters ignored two years of collaborative effort and its own justification for not including a designated preferred alternative in the draft EIS.	
100672	TYLER RISEN, DEBBIE RISEN		I recently learned that after a couple years of attending meetings, voicing our opinions, and personal stress concerning the placement of the Gateway West Transmission line, someone far removed from the Southern Idaho area wants to once again route the path of the 250kv power line through our private properties. As I understand it, either of the proposed alternate routes would pass within yards of my home, and after talking to someone who works for a power company and has experience with this type of line, it would render my home virtually uninhabitable and completely destroy our property value. My wife and I are not wealthy people, and a good portion of our life savings are tied up in the value of our one and only home. We originally bought this property sixteen years ago because of the beautiful location, and we have no desire to move, but if this line is rerouted we will have no choice. We will also likely lose most or all of our equity, because we won't be able to get a good price on the sale of our home.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100672	TYLER RISEN, DEBBIE RISEN		I am told the existing power line through the Birds of Prey area has not caused any negative impact on wildlife, but if you reroute it through our private properties it will have a hugely negative impact on the affected people and the communities as a whole. While I usually applaud efforts to protect wildlife, in this case I see no benefit whatsoever to wildlife, only a federal government ignoring the wishes and knowledge of the local citizens, communities, towns, state, and power company to impose a bad decision. Please do the right thing and allow the local experts and citizens on the scene to make the right decision. Don't destroy my home, my savings, and my faith in the federal government. PLEASE DO THE RIGHT THING! The "Gateway West" transmission line placement should be changed back to the State PREFERRED ROUTE!	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The issue is not that 500 kV transmission lines would harm the raptors; studies of the NCA have not shown this to be the case (e.g., Engel et al.; Steenhof et al.). The concern involves the level of disturbance and new roads associated with construction of the lines. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100673	GEORGENE MOORE		"PLEASE DO THE RIGHT THING! The "Gateway West" transmission line placement should be changed back to the State PREFERRED ROUTE!!!! "PLEASE DO THE RIGHT THING!	Your preference for the State's preferred alternative is noted. Refer to Section 2.4.1.1 for the reasons that the BLM's Preferred Alternative was chosen. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	The attached Audubon letter supports the recent U.S. Fish and Wildlife Service Conservation Objectives Team's (COT) draft report. The COT stresses the importance of supporting healthy populations of Sage-grouse through the amelioration of their habitat and connectivity between populations. We stress again that Gateway's alternative routes	Your opposition to the routing of the Project in Idaho is noted. Refer to Section 2.4.1.1 for the reasons that the BLM's Preferred Alternative was chosen.

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			in Idaho, including the southern split from Populus to Cedar Hill to Hemingway are in and around Priority Habitats as well as the areas connecting them. This is unacceptable to Prairie Falcon Audubon for the sake of healthy public lands and wildlife.	
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	We are deeply concerned and alarmed that BLM and the project proponents are ignoring the importance of National Audubon's IBAs in selecting alternative routes both in Wyoming and Idaho.	IBAs are discussed in Section 3.10. See Table 3.10-5 for IBAs crossed by the various alternatives considered in the analysis. The BLM attempted to avoid IBAs in identifying the Preferred Route. For example, Preferred 7 crosses 9.8 miles of the South Hills IBA while the Counties' proposed route (7K) crosses 67.6 miles of IBAs (36.2 miles of the Raft River IBA and 31.4 miles of the South Hills IBA).
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	We believe it's the obligation of BLM to protect and manage Sage-grouse habitat under the Federal Land Policy and Management Act of 1976 (FLPMA). FLPMA mandates that BLM public lands shall be managed "for multiple use and sustained yield," and to prevent "unnecessary or undue degradation" of public lands. BLM is not mandated to, or responsible for, meeting the needs or desires of private interests. In addition, the Special Status Species Policy mandates that BLM "shall ensure that actions authorized, funded or carried out by BLM do not contribute to the need for the species to become listed" (BLM Manual 6841.06C). The EIS must comply with BLM's sensitive species policy.	The BLM agrees that it has a responsibility to manage sage-grouse habitat under the Federal Land Policy and Management Act of 1976 (FLPMA) and that FLPMA mandates that BLM public lands shall be managed for multiple use and to prevent unnecessary or undue degradation of public lands. The BLM must also determine whether to allow the use of the National System of Public Lands for portions of Gateway West, in accordance with FLPMA and the BLM's ROW regulations, 43 CFR Part 2800; see Section 1.2 of the EIS for additional information on the Purpose and Need.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Though the DEIS Addendum goes into great detail about mitigating the negative impacts of the project, we believe "mitigation by avoidance" to be the best plan in all key/priority Sage-grouse habitat. These important areas are for the most part irreplaceable. Disturbed areas within key/priority habitat should be restored and not used to develop infrastructure. As stated in BLM's Best Management Practices (BMPs), "Place new utility developments, power lines, pipelines, etc. in existing utility or transportation corridors".	The BLM agrees that avoidance is the best mitigation. The Preferred Alternative is within the Governor's corridor through core habitat in Wyoming and avoids Preliminary Priority habitat in Idaho to the extent practicable. In some cases, staying within an established utility corridor means impacting sage-grouse habitat.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	We are very concerned that the DEIS Addendum acknowledges potential adverse direct, indirect, and cumulative impacts and yet draws the conclusion that because of purpose and need, the project should proceed despite the severity of these impacts. We find this is unacceptable. We still do not have a clear and definitive explanation from BLM, or the project proponents, for use of any of the senseless alternative routes through critical Sage-grouse and other sage-steppe obligate species' habitat in southern Idaho, including the South Hills Global IBA and possibly, the Raft River/Curlew Valley Global IBA. We are guessing that these routes may hook into wind farms, e.g. Simplot's near Rogerson, Idaho, as well as other future projects that could be deadly to birds, including Sage-grouse, and encourage a web of harmful power lines throughout key/priority habitat. Wind farms located on or near remote public lands have now been shown to be costly to the public and for the most part inefficient.	The explanation of each route considered in detail is contained in Section 2.4. Mitigation for direct effects on sage-grouse and other species is included in the FEIS; additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. Potential and existing wind energy sources are discussed in Chapter 4.

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100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Prairie Falcon Audubon (PFA) recognizes that new energy developments are important for our energy future. However, any energy project must be sited in a way that does not harm species or their habitat, including ours. Our views are in alignment with the National Audubon mission statement. "National Audubon's mission 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." Summary: PFA strongly opposes all of the alternative routes proposed in the DEIS Addendum south of the Snake River in Idaho, including the split route connecting through the proposed Cedar Hill substation to be sited in a Global Important Bird Area (IBA). The South Hills IBA (see maps – APPENDIX A and APPENDIX B) has been designated to be of global significance because it holds significant numbers of Greater Sage-grouse, a globally threatened species, because it holds significant populations of narrow endemics and species with very limited distribution, and because it supports exceptionally large numbers of migrating and congregating species.	The BLM attempted to select routes that avoid IBAs (as well as other important resources) where feasible. Preferred 7 crosses 9.8 miles of the South Hills IBA while the Counties' proposed route (7K) crosses 67.6 miles of IBAs (36.2 miles of the Raft River IBA and 31.4 miles of the South Hills IBA).
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	We are deeply concerned and alarmed that BLM and the project proponents are ignoring the importance of National Audubon's IBAs in selecting alternative routes both in Wyoming and Idaho. "Audubon's Important Bird Areas Program is part of a global effort to identify and conserve areas vital to birds and other biodiversity. It engages Audubon staff, chapter members and other volunteers to identify, monitor and steward critical habitat areas in and around their communities"(IBAs and the Sagebrush Initiative - Letter from Audubon pending) If this project is located in, surrounding, or going through IBAs it would be very counterproductive to ensuring the protection of sage-steppe that is globally recognized for the protection of avian species such as Sage-grouse. The alternative routes around and through the South Hill IBA could result in fragmentation and loss of connectivity with surrounding populations east and west, e.g. Browns Bench, China Mountain, and south in northern Utah and Nevada.	The BLM avoided IBAs where feasible. Preferred 7 crosses 9.8 miles of the South Hills IBA while the Counties' proposed route (7K) crosses 67.6 miles of IBAs (36.2 miles of the Raft River IBA and 31.4 miles of the South Hills IBA).
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	As acknowledged in the DEIS Addendum, the proposed alternative routes will have a direct impact while adding to the devastating cumulative effects of overgrazing in almost all of the areas of the alternative routes in southern Idaho. PFA believes livestock grazing (overgrazing) is the number one issue facing Greater Sage-grouse conservation in Idaho. Overgrazing contributes to huge losses of Sage-grouse and other sagebrush obligate species, due to loss and degradation of native habitat and important watersheds. Below is an excerpt from PFA's scoping comments to BLM's Sage-grouse Planning Strategy. When PFA refers to the word "overgrazing", we are talking about the impacts of grazing on public land over a long period of time, one hundred years or more in most cases. During most of that time	The adverse impacts due to grazing are discussed in Sections 3.10 and 3.11. Conducting a detailed analysis of grazing levels across a thousand miles of rangeland is beyond the scope of this EIS. The BLM is currently conducting an analysis of grazing levels on 16 planning units in six western states under a 2011 court decision. Grazing is further discussed in Sections 3.17 and 3.18 of the FEIS. Cumulative impacts of grazing on various resources are discussed in Chapter 4, in multiple resource subsections of Section 4.4.

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			<p>period of that time, there was not adequate monitoring and oversight by BLM, USFS, and State Lands Commission, agencies that were set up specifically to protect public land. Below is a list of impacts PFA members have observed and documented over the last twenty or more years (in the Burley BLM Field Office and the Sawtooth National Forest, Minidoka Ranger District and now, Jarbidge BLM Field Office). These are concerns we have for sage steppe habitat overgrazed by livestock on public land. We are not all scientists or biologists, but we have worked to learn as much as we can about issues and impacts by livestock as well as properly functioning ecosystems. Grazing in sage-steppe habitat causes:</p> <ul style="list-style-type: none"> -Soil erosion and compaction (we believe in most cases, the degree of severity is limited only by topography); -Loss of mesic and riparian areas; -Loss of riparian vegetation and bank integrity; -Gulley and wash formation; -Lowering of the water table; -Dysfunctional watersheds; -Invasive weeds and grasses; -Loss of mosses and biotic soils; -Loss of native vegetation such as forbs, shrubs, trees, and grasses; -Loss of ground cover, including little or no litter in many areas; -Trampling of nesting and brooding areas of ground nesting birds including Sage-grouse -Little or no understory in many areas; -Over-utilized crested-wheat seedlings; -Plant pedestalling, surrounding bare ground, and exposed roots; -Large areas of open and connecting bare ground; -Large "sacrifice" areas near streams, springs, seeps, and water developments (improvements?); -Stagnant water in impoundments, troughs, etc. that may harbor mosquitos and thus West Nile Virus; -Loss of water quality, silt and pollution (introduction of livestock feces and urine); -Fencing unfriendly to wildlife, netting and many strand fencing still found on BLM and US Forest lands; -Loss of native habitat to wildfire and encouraging repeated fire cycle; -Loss of reseeded areas, burns and vegetation treatment projects by allowing livestock back before plants have sufficient growth to survive (two full years or less); -Grazing in early spring, late winter, prolonged wet seasons, and year round; -Insufficient cover for wildlife; -Frequent aerial gunning (observed and documented by PFA members in Burley F.O.); -Failure to rehabilitate pipelines and burns (invasive weeds, grasses and 	

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			<p>bare ground).</p> <p>We have also observed and documented many of the adverse impacts from infrastructure and roads through Sage-grouse habitat sited in this DEIS Addendum, e.g. the introduction of invasive weeds and grasses in disturbed areas with continued grazing even with reseeding and restoration. As stated above, our concerns about vegetation treatments and burns are valid, as we have observed and documented what happens after treatments when grazing is allowed back at two years or sooner. We believe BLM and the USFS must not allow grazing until after a much longer period of time, five to ten years. This allows for a more permanent restoration to counter invasive grasses, weeds and wildfire and saves taxpayers' dollars.</p>	
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>USFWS states: "Evidence suggests that habitat fragmentation and destruction across much of the species' [Greater Sage-grouse] range has contributed to significant population declines over the past century." (USFWS "Endangered Species" page summary of the 2010 "warranted but precluded" finding) Agriculture, grazing, infrastructure, and energy development all contribute to the fragmentation, damage and loss of Sage-grouse habitat and are the main reasons for Greater Sage-grouse decline. The USFWS specifically identified power lines as adversely impacting Sage-grouse and its habitat. Infrastructure was also cited by the Idaho Governor's Sage-grouse Task Force as one the main reasons for the decline of the Sage-grouse. Yet BLM continues to support projects such as this one without clearly making a stand and protecting Sage-grouse and its habitat. Why?</p>	The BLM recognizes that sage-grouse habitat has been adversely affected and that transmission lines are one of the factors, along with others noted in the comment. An HEA was conducted to identify effects and mitigation for direct effects. Additional mitigation is being prepared for indirect effects. See Section 1.2.1 for the BLM's Purpose and Need.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>In Conclusion, the DEIS Addendum acknowledges direct, indirect, and cumulative impacts to Greater Sage-grouse, but at the same time draws the conclusion that because of purpose and need, the project should proceed despite the severity of these impacts. It also promotes the use of tactics such as off-site mitigation and if need be alter and/or amend current BLM RMPs and Forest Plans, such as the Kemmerer RMP, to fit the project's need instead of protecting wildlife habitat. This is unacceptable to us</p>	You comment that the Project is unacceptable to you despite proposed off-site mitigation is noted.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>We believe BLM's preliminary and to a greater degree, Idaho Governor's task force maps trivialize and minimize the importance of Sage-grouse habitat in central and eastern Idaho. Their current lek-based habitat maps do not realistically depict Idaho's Sage-grouse habitat. It fragments habitat and reduces connectivity amplifying impacts such as new development, and leaves out important intact sagebrush areas important to Sage-grouse and other sagebrush-dependent species.</p>	Evaluating the Idaho Governor's sage-grouse habitat maps is beyond the scope of this analysis. The BLM is preparing an EIS for sage-grouse management as a separate project. This analysis includes the task force's habitat maps as one of the alternatives considered. In the meantime, the BLM will continue to use the current habitat mapping system.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>On the maps in the DEIS Addendum it is not clear to us where the existing transmission lines or the existing corridors are located.</p>	We attempted to make the maps in the FEIS clearer.

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100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Allowing use of any of the alternative routes south of the Snake River in southern Idaho could realistically result in a significant loss of Idaho's Sage-grouse as well as sagebrush-steppe obligate species and key/priority sage grouse habitat through greater fragmentation and the loss of connectivity.	The objectives for considering Segments 7, 9, and 10 in the analysis are included in Section 1.3.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Again, the Special Status Species Policy mandates that BLM "shall ensure that actions authorized, funded or carried out by BLM do not contribute to the need for the species to become listed" (BLM Manual 6841.06C).	The BLM agrees that the Project should not contribute to the need for the species to become listed. The analysis indicates that it will not, considering the proposed mitigation. See the USFWS's Biological Opinion attached to the ROD.
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	The only routes through Idaho on the DEIS Addendum map that make any sense to us are the ones NORTH of the Snake River crossing near Melba to Hemingway. Prairie Falcon Audubon requests that Project proponents be made to follow BLM's own Best Management Practices(BMPs), "Place new utility developments, powerlines, pipelines, etc. in existing utility or transportation corridors" with few exceptions to protect important sage-steppe habitat for Sagegrouse and ultimately ourselves.	The BLM's preferred routes largely avoid preliminary priority habitat in Idaho. In some cases, following existing transmission lines is best for protecting the range of resource values BLM must manage for, but in some cases this is not feasible (such as using the corridor through the Fort Hall Reservation) or is not the least impactful route (such as the existing transmission line through the NCA).
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Per the notation in the Prairie Falcon Chapter's HEA comments, please consider this the National Audubon Society's (and Audubon Rockies, the Rocky Mountain regional office) letter explaining the Important Bird Areas program and the Sagebrush Ecosystem Initiative. While we recognize that the Final Environmental Impact Statement is due to be released in late November 2012, we believe the value of the area's wildlife resources that could be impacted by this proposed high voltage transmission line warrant the BLM's serious consideration of this information. I. Important Bird Areas Reflect Critical Avian Habitat Important Bird Areas ("IBAs") are part of an international program to identify priority areas where threatened, restricted-range, biome-restricted and congregatory birds occur. In the United States, this program is managed by the National Audubon Society. A site is recognized as an IBA only if it meets certain criteria, which are internationally agreed, standardized, quantitative and scientifically defensible. Scientists identify locations that provide essential habitat to one or more species of birds during some portion of the year (nesting areas, crucial migration stop-over sites, or wintering grounds). The selection of IBAs has been a particularly effective way of identifying conservation priorities. The identification of such critical habitats is an important consideration in generation and transmission development, as these areas should be avoided due to their ecological value. To that end, the influential Western Electricity Coordinating Council's ("WECC") Environmental Data Task Force ("EDTF") ultimately included Important Bird Areas as a preferred data set when evaluating potential transmission alternatives. According to the EDTF, "high voltage transmission lines have a relatively small direct footprint on the ground; however, large interstate transmission lines can also indirectly	The BLM attempted to select routes that avoid IBAs where feasible. Preferred 7 crosses 9.8 miles of the South Hills IBA while the Counties' proposed route (7K) crosses 67.6 miles of IBAs (36.2 miles of the Raft River IBA and 31.4 miles of the South Hills IBA). The FEIS recognizes the importance of sagebrush habitat. The FEIS includes an HEA to identify mitigation for direct effects. These analyses considered current science on impacts to sage-grouse from human developments and other factors (such as fires). Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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			<p>and cumulatively impact wildlife, cultural and historical features and water resources” (WECC 2011) [Footnote 1]. Thus, “the anticipated benefit of incorporating environmental and cultural information upfront in the transmission planning process is to reduce the potential for conflict with these resources during subsequent siting, permitting, and constructions” (WECC 2011). Additionally, the National Audubon Society works with national and international partners to further the value of IBAs. The North American Bird Conservation Initiative (NABCI) is an attempt to coordinate bird conservation efforts throughout the US, Canada, and Mexico. The IBA Program contributes to this initiative by identifying the most important sites at which to implement large-scale conservation efforts to ensure the protection of all bird species in all habitats. II. Sagebrush Ecosystem Initiative The sagebrush ecosystem, once covering vast stretches of western North America, has experienced new pressures over the past century. Due to human activities, less than half of the formerly rich sagebrush landscape remains today. These pressures impact a wide range of species that are dependent on this unique habitat – 297 bird species, 87 species of mammals, and 63 fish species. Among the most recognizable are the world-class populations of sage-grouse, mule deer, elk, and pronghorn antelope. Audubon has set in motion the Sagebrush Ecosystem Initiative (SEI) in order to help conserve the sagebrush ecosystem. Specifically, we are focusing initial conservation efforts on the Greater sage-grouse, a keystone species and an indicator of overall ecosystem health. A biologically-based roadmap for grouse conservation will provide the tools necessary for successful conservation in the entire region and result in benefits to an entire ecosystem. The overall goal of the SEI is to maintain and enhance populations and distribution of Sage-Grouse by protecting and improving sagebrush habitats and ecosystems that sustain these populations, thus conserving a wide range of wildlife species that depend on the sagebrush ecosystem. The overarching framework of the SEI is science-based conservation, identification and mitigation of threats to the sagebrush ecosystem and Sage-Grouse populations, coupled with policy and education. The SEI is a long-term, ecosystem-wide effort that will ensure collaborative conservation efforts are implemented across jurisdictional boundaries. III. Science-Based Decisions – Using New Sage-grouse Documents As an organization that is grounded by science-based conservation, we are taking this opportunity to highlight two new reports pertaining to Greater Sage-grouse conservation. The first is the new scientific findings and recommendations set forth in the document titled, “A Report on National Greater Sage-Grouse Conservation Measures” produced by the BLM’s Sage-grouse National Technical Team and dated December 21, 2011 (Technical Team Report)[Footnote 2]. We strongly request that the BLM analysis in the FEIS consider the</p>	

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			<p>scientific recommendations of the Technical Team Report. It is well recognized that Wyoming is the strong-hold for Greater sage-grouse and the sagebrush landscape, on which the species completely depends, and that Idaho contains critical populations of this candidate species. The BLM's own Regional Breeding Density Map, [Footnote 3] which Audubon was involved in its creation, also identifies the areas potentially impacted by Gateway West as very important to sage-grouse. Decisions made pertaining to the construction of Gateway West, and specifically the routing locations, will be critical for the recovery of the species. Extensive research has shown the negative impacts of human activities and infrastructure development on sage-grouse populations. These impacts include change in habitat use patterns (use of lower quality habitats), avoidance, increase in invasive species, death due to collision and electrocution, habitat fragmentation, cumulative impacts, and creation of travel routes for land predators. Furthermore, researchers have documented a correlation between human footprint and sage-grouse persistence and performance in altered landscapes, providing important insights into impacts of anthropogenic changes in landscape (Aldridge 2000, Braun et al. 2002, Holloran 2005, Naugle et al. 2010). Much of this research is compiled, referenced and relied on by the NTT Report.</p> <p>The second report was released in late August 2012 by the U.S. Fish and Wildlife Service. This report was designed to help guide the efforts of the States and other partners to conserve Greater Sage-grouse with a landscape-level strategy that will benefit the species while maintaining a robust economy in the West. The report, "Sage-Grouse Conservation Objectives Draft Report" [Footnote 4] prepared by state and federal scientists and sage-grouse experts, used the latest scientific information to (1) identify the conservation status of the sage-grouse, (2) the nature of the threats facing the species, and (3) objectives to ensure its long-term conservation. The Sage-Grouse Conservation Objectives Team recommended "that impacts be avoided to the maximum extent possible ... to sustain the functional value of the PAC impacted" (Priority Areas for Conservation, page 32). Furthermore, as the area in question in Wyoming is identified as having C4 populations, the Team states that "plans should have the objective of maintaining C4 populations" where they exist (page 32). The Idaho populations are listed as C1, C3, and C4 - populations at greater risk than the Wyoming portion. This report and recommendations need to be included in the FEIS, as this high-voltage transmission line project will influence sage-grouse at a regional and landscape-scale.</p>	
100674	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	If this project is allowed to use the alternative routes throughout key/priority habitat including IBAs it sets a precedent for new routes for other transmission lines, oil and gas and even water export. This coupled with what we see as a total disregard for the negative	We assume this comment refers to Alternative 7K (and/or 7H, 7I, and 7J which were dropped between draft and final). Note that 7K was not the BLM's Preferred Route (although it is Cassia and Power Counties' preferred route).

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			cumulative impacts such as overgrazing already along (all) alternative routes and an unwillingness to wait for the final National Greater Sage-grouse Planning Strategy to complete their EIS, leads us to believe the proponents are not interested at all in saving Sage-grouse or its habitat.	
100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	The Golden Eagle Audubon Society is writing to highlight our concerns with the potential impacts of the current alternative routes, including the preferred alternative, for the Gateway West Transmission Line in Idaho. Our organization, based in Boise, ID, is southwestern Idaho's chapter of The National Audubon Society. We have approximately 2500 members who frequently bird watch in the Morley Nelson Snake River Birds of Prey National Conservation Area; as well as bird watch in the proposed area of Preliminary Priority Habitat for Greater Sage-grouse. Our Board consists of biologists, ecologists, and bird watchers who are deeply concerned about the impacts the proposed transmission lines will have on raptors, if routed through the Morley Nelson Snake River Birds of Prey National Conservation Area, or conversely on Greater Sage-grouse, if routed through the Preliminary Priority Habitat.	The BLM's Preferred Route largely avoids the SRBOP NCA, crossing within or near designated utility corridors near the edge of the NCA.
100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	We have approximately 2500 members who frequently bird watch in the Morley Nelson Snake River Birds of Prey National Conservation Area; as well as bird watch in the proposed area of Preliminary Priority Habitat for Greater Sage-grouse. Our Board consists of biologists, ecologists, and bird watchers who are deeply concerned about the impacts the proposed transmission lines will have on raptors, if routed through the Morley Nelson Snake River Birds of Prey National Conservation Area, or conversely on Greater Sage-grouse, if routed through the Preliminary Priority Habitat.	The BLM's Preferred Route largely avoids the SRBOP NCA, crossing within or near designated utility corridors near the edge of the NCA. The NLCS staff concluded that crossing in these locations would meet the enhancement requirements of the enabling legislation with mitigation.
100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	Routing the Gateway West Transmission Line in southwest Idaho requires BLM to balance several conflicting policies and interests. Our organization has been engaged in this process and at this point, due to the significant conflicts with the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) and Preliminary Priority Habitat for Greater Sage-grouse (PPH), we believe that a further discussion of how to design an acceptable alternative is needed – and would like to engage in such discussions with the Bureau of Land Management (BLM). We believe that these discussions can help lead BLM to a decision that best addresses the many values and interests at stake.	The BLM will continue to meet with local stakeholders it try and reach a consensus on the best routes. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	Conflict with National Conservation Area A number of the potential transmission line routes (notably routes 9, 9D, 9Ea and 9F) would cross portions of the Morley Nelson Snake River Birds of Prey NCA, a unit of the National Landscape Conservation System (Conservation Lands). The National Landscape Conservation System was established “in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and	The BLM's Preferred Route largely avoids the SRBOP NCA, crossing within or near designated utility corridors near the edge of the NCA. The NLCS staff concluded that crossing in these locations would meet the enhancement requirements of the enabling legislation with mitigation.

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			<p>future generations.” National Landscape Conservation System Act, 16 U.S.C. § 7202(a) (2009). Secretarial Order 3308 speaks to the management of the Conservation Lands, stating that “BLM shall ensure that the components of the NLCS are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.” The 15-Year Strategy for the Conservation Lands reinforces this by stating the “conservation, protection, and restoration of the NLCS values is the highest priority in NLCS planning and management, consistent with the designating legislation or presidential proclamation.” Conservation Lands Strategy at 8. As conservation of natural and cultural resources is the principal mandate for BLM management of the Conservation Lands, the agency must diligently protect these areas from damage from new infrastructure projects, including transmission lines. Recent BLM policy guidance specifically addresses the management of BLM-managed national monuments and NCAs and creates a presumption that BLM will not approve new rights-of-ways (ROW) in these areas. Specifically the manual provides: 5. To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designating or authorizing use of transportation or utility corridors within NLCS units. To that end, and consistent with applicable law, when developing or revising land use plans addressing NLCS units, the BLM will consider:</p> <ul style="list-style-type: none"> a. designating the NLCS unit as an exclusion or avoidance area; b. not designating any new transportation or utility corridors within the NLCS unit if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the NLCS unit was designated; and c. relocating any existing designated transportation and utility corridors outside the NLCS unit. BLM Manual 6100, § 1.6J(5). The law establishing the Snake River Birds of Prey NCA includes specific provisions addressing allowable uses of the NCA. The key provision directs the BLM to identify “levels, types, timing, and terms and conditions for the allowable nonmilitary uses of lands within the conservation area that will be compatible with the protection, maintenance, and enhancement of raptor populations and habitats and the other purposes for which the conservation area is established.” 16 U.S.C. § 460iii-3(b)(7) (emphasis added). These “other purposes” include “the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.” 16 U.S.C. § 460iii-2(a)(2). Thus, only those proposed actions that would “protect, maintain, and enhance” the purposes of the NCA are permissible. <p>Transmission line development causes serious impacts, including direct damage to wildlands, wildlife habitat and cultural resources; interference</p>	

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			with scenic vistas; habitat fragmentation; and others. Consequently, transmission lines are generally incompatible with management of the Conservation Lands absent a specific showing of how such a project would “protect, maintain, and enhance” the raptors, raptor habitat and the other purposes for which the NCA was designated. The BLM has not provided analyses that demonstrate this standard has been met for the Gateway West line.	
100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	Furthermore, transmission lines may become an even larger threat when lines are located close to cliff-nesting sites. Young birds learning to fly and adults engaged in territorial defense and courtship could be far more susceptible to collision, especially at newly constructed lines. As stated on pages 3.10-36-37 of the DEIS, “Edge effects brought about by vegetation removal could lead to a change in plant species composition, potentially lowering the quality of habitat for raptors or their prey.” Additional habitat fragmentation in a congressionally established National Conservation Area that has suffered from extensive fragmentation over the last 30 years cannot be allowed. Fragmentation will affect far more nesting raptors than those that nest within a mile of the transmission line. Telemetry research has shown that Prairie Falcons forage up to 15 miles north of their canyon nesting sites.	The BLM's Preferred Route largely avoids the SRBOP NCA and cliff areas. The Preferred Route crosses within or near designated utility corridors near the edge of the NCA.
100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	Conflict with Greater Sage-grouse Habitat BLM's alternative route 9E would pass through identified Preliminary Priority Habitat (PPH) for the greater sage-grouse. Currently, the U.S. Fish and Wildlife Service found the greater sage-grouse warrants protection under the Endangered Species Act and has committed to a final listing decision in 2015; BLM is in the process of rangewide planning to design conservation measures and regulatory mechanisms that would avoid listing. BLM's Instruction Memorandum (IM) 2012-043 “provides interim conservation policies and procedures to the Bureau of Land Management (BLM) field officials to be applied to ongoing and proposed authorizations and activities that affect the Greater Sage-Grouse (<i>Centrocercus urophasianus</i>) and its habitat.” BLM's alternative route 9E will attract raptors and ravens and could lead to increased predation on declining grouse populations. Golden Eagles prey on adult sage-grouse, and Common Ravens are a major predator of sage-grouse eggs. It would be better to attract raptors and ravens to cheatgrass areas, where they feed on ground squirrels, than to shrubsteppe areas inhabited by sage-grouse. BLM's alternative route 9E would be in close proximity to occupied leks and brood-rearing areas. Nest failure is an important factor in sage-grouse population declines, and nest predation by ravens is a primary cause of sage-grouse nest failure. Ravens cue in on the movements of grouse to and from nests. Female sage-grouse are able to escape direct predation but are unable to defend nests successfully, especially when confronted with more than one raven.	Alternative 9E was revised between draft and final EIS to avoid preliminary priority habitat (PPH) for sage-grouse. Based on indicative engineering, it does impact 7 acres due to improvements on existing roads. PPH would be avoided to the extent feasible during final design. The comment is correct that this route cross within 10 miles of leks; however, Alternative 9E would only be within the 2-mile buffer of one lek center. The alternative would be to site the line in the NCA, which has its own set of issues, as noted in the above comments. The BLM spent years studying possible routes. There are no routes without some adverse consequence to wildlife resources. Even siting the line along the state highway would place it within 10 miles of many leks.

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			<p>BLM's own data indicate that sage-grouse nests within 10 miles of transmission lines are easily accessible to ravens that nest, perch and roost on transmission line towers. Perch deterrents have not proven to be successful. PPH, as identified in BLM's Greater Sage-Grouse Interim Management Policies and Procedures, IM 2012-043 (12/27/2011), "comprises areas that have been identified as having the highest conservation value to maintaining sustainable Greater Sage-Grouse populations" that "have been identified by the BLM in coordination with respective state wildlife agencies." For pending projects in PPH (including those for which a Draft EIS has been issued and would likely have more than minor adverse effects on sage-grouse), the IM provides that the agency must: - Ensure that reasonable alternatives for siting the ROW outside of the PPH or within a BLM-designated utility corridor are considered and analyzed in the NEPA document. -Identify technically feasible best management practices, conditions, etc. (e.g., siting, burying powerlines) that may be implemented in order to eliminate or minimize impacts. (emphasis added) IM 2012-043 requires additional procedures for pending right-of-way applications that would affect more than one linear mile of sage grouse habitat. Segment 9E would have nearly fifty times that level of impact. These procedures include a high-level interagency review process for any right-of-way project that would fail to "cumulatively maintain or enhance sage-grouse habitat." The sage-grouse habitat that will be affected by proposed project routes has been acknowledged by both BLM and the State of Idaho [Footnote 1] as important for protection. Allowing development of a large transmission line through this landscape could result in harmful, and potentially irreversible impacts to important greater sage-grouse habitat, both by damaging sage-grouse habitat through the construction and maintenance of power lines and by providing "perches" for raptors and other birds of prey to more easily prey on sage-grouse. The U.S. Fish and Wildlife Service found that transmission lines have a range of adverse impacts on sage grouse and their habitats. 75 Fed. Reg. 13909, 13928-29 (March 23, 2010). The Service's 12-month finding on sage grouse noted the many transmission line proposals pending in the western states and explained "If these lines cross sage grouse habitats, sage grouse will likely be negatively affected." Id at 13929. More recently, the BLM's Sage-grouse National Technical Team reached the same conclusion and recommended that the BLM "[m]ake priority sage-grouse habitat areas exclusion areas for new [right-of-way] permits" with narrow exceptions. Id. Consequently, transmission lines should be avoided in PPH, and the BLM has not made the requisite findings or considered measures to avoid or offset damage to the habitat that would be affected by this project.</p>	

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100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	Although newly developed Alternative 9Ea would not cross directly into PPH, it would run immediately adjacent to PPH and would affect sage grouse within PPH. If this route receives further consideration, BLM must disclose these impacts and consider mitigation measures, including offsite mitigation.	The FEIS does disclose the impacts to PPH, see Table 3.11-15g in Section 3.11. Alternative 9E was revised to avoid preliminary priority habitat (PPH) for sage-grouse. Based on indicative engineering, it does impact 7 acres due to improvement of existing roads. PPH would be avoided to the extent feasible during final design. Mitigation for impacts to sage-grouse is included; see Appendix C-3 and Appendix J. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.
100675	MICHELE CRIST, LEAH DUNN	GOLDEN EAGLE AUDOBON SOCIETY	Need for a creative solution We appreciate the difficulty of the agency's position in finding a viable alternative. In light of the serious concerns raised by the routes discussed above, we believe there is a need to evaluate creative solutions that meet the BLM's policies and mandates for the Morley Nelson Snake River Birds of Prey NCA and greater sage-grouse habitat. Due to the multiple resource conflicts with proposed routes, especially those in Segment 9, a variety of options should be considered, such as possibly limiting the proposal to one transmission line through this segment (instead of two parallel lines), which could ultimately result in a workable solution.	The BLM will continue to meet with local stakeholders to try and reach a consensus on the best routes.
100676	JOYCE BURCH		Why does the U.S. government want to override the consensus of residents of Idaho, city and county government, the governor of Idaho, and the Idaho BLM? Is it to avoid doing harm? NO. Great harm would be done to the landowners and communities affected, while running the power lines closely parallel to already existing power lines on BLM land would have no detrimental effect on either people or wildlife. Is it to avoid cost? NO. The cost of obtaining private lands will be far higher to Idaho Power, and the cost would then be passed along to Idaho Powers customers. Please do the right thing! The "Gateway West" transmission line placement should be changed back to the STATE PREFERRED ROUTE.	Building two new transmission lines in the NCA would require ground disturbance and new access roads, in addition to the towers and conductors. The NLCS staff concluded that crossing in these locations would meet the enhancement requirements of the enabling legislation with mitigation. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100677	KATHY ALDER, DAVID FERDINAND, STEVE RULE	CANYON COUNTY, BOARD OF COMMISSIONERS	This letter is in support of Idaho Governor C.L. "Butch" Otter's October 10, 2012 request that the Bureau of Land Management (BLM) adopt the Gateway West Transmission Line Project route proposed through the collaborative effort of Idaho state agencies, local governments, and citizens (the letter is attached hereto). The current BLM proposed route would disrupt farming and other agricultural land uses which are the heart of Canyon County. Moreover, the current BLM proposed route will cut through a primary growth area in Canyon County – potentially adversely impacting property values and quality of life in that area. The BLM cannot ignore the input of property owners, citizens and other stake holders who previously dedicated over two years to collaborating on an alternative route. On behalf of the people of Canyon County we request that the BLM immediately reconsider its current preferred route for the Gateway West Transmission Line and work with Gov. Otter and other state and local officials to rectify the problems posed by the BLM's current route. We hope that we can return their support to a collaborative route that better serves the interests of Idaho citizens.	The NLCS staff concluded that crossing in these locations would meet the enhancement requirements of the enabling legislation with mitigation. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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100678	ANNA ROGERS		Please do the right thing, we are the citizens YOU WORK FOR. Change the "Gateway Transmission Line" placement BACK TO THE PREFERRED ROUTE NOW.	The BLM has worked with local interests over the past several years to "do the right thing". The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100679	DON HAMILTON, BETTY HAMILTON		PLEASE DO THE RIGHT THING! The "Gateway West" transmission line placement should be changed back to the State and LOCAL RESIDENT/LAND OWNER PREFERRED ROUTE!!!!!! You need to agree with the local residents and approve routing this line across the previously agreed upon corridor with the bulk of it on public (BLM) ground. Construction of this line is stated to be "for the common public good", , , It should be routed across the public's (of which we are members of too) land. I have lived within ten miles of the current Snake River Birds of Prey area for my entire life of almost 63 years. For approximately the last eleven years, we have lived right across the road from it. During that time I have bird watched, hiked, exercised our dogs, hunted, worked, and fished within its current boundaries. As residents of the area, we observe birds of prey in ways that weekend and part time bird studiers and watchers cannot. Believe me when I tell you that the current power lines across the bird area have minimal to no impact on the resident and migratory bird populations. Many of the eagles, hawks and owls take advantage of the existing power line towers for hunting, roosting and observation posts. I ask of you again, please put this line where it belongs, on next to existing lines on PUBLIC LAND!	The BLM has worked with local interests over the past several years to "do the right thing". The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project. Mitigation plans have been prepared, including one for migratory birds.
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	Power and Cassia Counties, as Cooperating Agencies, submitted substantial comments to the BLM draft EIS questioning the need or basis for an artificial and inflexible separation criteria that the proponents have used in this process. See FEIS L-1 When the Cooperating Agencies have contested proposed routes as being nonsensical or harmful, the Proponents have merely relied upon this "all powerful WECC" to say that is the way it must be. The Cooperating Agencies had hoped that with these comments, and raising these issues, that Tetra Tech would conduct the appropriate research and give an independent view of this separation criteria. We noted that the Wyoming Governor had conducted an analysis, and ICF had issued a substantial report also questioning WECC separation criteria. The response from Tetra Tech in the FEIS is very disappointing. Tetra Tech and the BLM have given short shrift to our comments about WECC separation criteria. For example, we commented that the drafting team for WECC had recently proposed revising their separation criteria. We noted that the drafting team believes that the possibility of an airplane dragging a conductor from one circuit to another circuit on a separate tower "is an extremely low probability event and practically impossible. Designing a system for this very low probability event by treating the two circuits as if they are on the same tower is not appropriate." FEIS	The BLM recognizes that the Counties do not accept the WECC criteria; however, the BLM does not have expertise in utility reliability requirements and relies on federal agencies with this expertise on these criteria. See the discussion in Chapter 1.

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			<p>Appendix L-1.</p> <p>In response to our comments, Tetra Tech stated "additional information about separation criteria has been included in the FEIS." However, we cannot find that additional information. Going to that section of the FEIS, that document states generally the Proponents are obligated to avoid common mode failure such as "a snagged shield wire from one line being dragged into the adjacent line, an aircraft flying into more than one line." FEIS 1-10. One of our Task Force members at a recent meeting with; the BLM, complained that talking to Tetra Tech and the BLM is like "talking to a blank wall." It does not appear that Tetra Tech did any sort of research at all into the background or basis for WECC's separation criteria or the possible amendments or changes. The issues we raised, and the issues raised by the Wyoming Governor's report apparently were not investigated at all. If the best Tetra Tech can do in response to our complaints, suggestions and questions about separation criteria is to ignore them and continue on quoting only the Proponents, FEIS 1-10 through 1-13, then something is wrong with this process.</p>	
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	<p>A review of the history of power line failures show that by far the vast majority of those failures are equipment failures, often in the substations themselves. These alleged common mode failures appear to the Cooperating Agencies to simply be an excuse to put the lines where the Proponents want, regardless of the consequences to the landowners.</p>	<p>The BLM recognizes that the Counties do not accept the WECC criteria; however, the BLM does not have expertise in utility reliability requirements and relies on federal agencies with this expertise on this. See the discussion in Chapter 1. The BLM has decided to follow the phased decision approach; it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.</p>
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	<p>Through the years, their citizens task forces and the County Commissioners have attended numerous meetings with the BLM as well as held numerous citizens meetings and informational meetings about the proposal. Cassia and Power Counties became Cooperating Agencies on the project, and have regularly attended BLM meetings and participated in conference calls. Cassia and Power County worked with their citizens task forces to develop acceptable alternative routes to the proposed Gateway West routes. As we have quoted to the BLM many times, under the Idaho Land Use Planning Act, the counties are the siting authority for electric transmission corridors within their counties. As you have noted, you consider the counties to be on an equal standing with the BLM for purposes of those siting considerations. After over 5 years of study, the BLM has announced its designated, preferred alternative routes. The counties officially adopted routes that were not selected by the BLM. In general, it appears that the BLM has chosen to protect public lands, visual resources and threatened species, such as sage grouse, by avoiding allowing the transmission line's on public land. That has resulted in, as far as Power and Cassia Counties are concerned, BLM preferred routes ranging from 70-80% on private land. The BLM land that would be allowed for the transmission lines</p>	<p>You comment is correct in as far as stating that the BLM has chosen to protect public lands, visual resources, threatened species, and sage-grouse in selecting a preferred route. BLM has a responsibility to protect these resources. The BLM could not adopt the County's preferred route for Segment 5 because the Shoshone-Bannock Tribal Council would not agree to another transmission line crossing the Reservation. The BLM could not adopt Alternative 7K because 7K would impact nearly 10 times as much PPH as the BLM's Preferred Route.</p>

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			was carefully selected by BLM to avoid any potentially detrimental impact to that public land. However, it does not appear that the same consideration was given to private land.	
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	The BLM readily acknowledges that it has no authority or jurisdiction to authorize or allow the electric transmission systems on private land, its authority is generally limited to the public land. However, designating a preferred alternative route that contains a vast majority of private land is not consistent with the BLM's authority. Moving a 185 foot transmission tower a few yards from public land to private land does not decrease the potential for raptor perches or effect the visual to an observer. It just changes jurisdictions. Obviously, as has often been stated, the connections between public land and private land must link. That is why the task forces from Power and Cassia Counties worked very hard to make a continuous link that was acceptable to the Counties, and, we thought, to the BLM and other federal land managers. The Counties' recommendation, particularly for Segment 7, was rejected. Apparently it was rejected because the route was longer, which would impact the Proponent's costs, as well as potential impact to sage grouse. This decision has disappointed and frustrated the Cooperating Agencies. The cost to the Proponents must be measured against the cost to the impacted private landowner. The EIS spends a great deal of analysis showing the extremely high economic cost to a private landowner, particularly compared to the economic cost to public land by the presence of the transmission corridor.	Please note that the comment is not correct in stating that the "vast majority" of the Gateway West route is on private lands. Less than half of the 1,000-plus mile preferred route is on private land. In regard to Segment 7, the County-preferred route (7K) is approximately 30 miles longer, and construction would be approximately 60 million dollars more than the preferred route based on the line drawn across the map by the counties. An actual design would need to consider topography and other constraints and would likely be somewhat longer and therefore more expensive to build (see Figure 2.4-3 for an example). Alternative 7K would cross 55.1 miles of private land, compared to 85.8 for the preferred route. Alternative 7K would impact 1,386 acres of preliminary priority sage-grouse habitat (PPH) compared to 149 for the preferred route. The BLM could not select a route with that level of impact to PPH. The BLM will continue to work with the Proponents and state and local governments to find an acceptable route for the transmission line in these segments. If the sage-grouse habitat classification resulting from the sub-regional EIS decision is different from the current BLM classification in the area of Alternative 7K, and project construction has not begun in Segment 7; the BLM will consider this new information and determine if its siting decision for Segment 7 should be reviewed.
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	Similarly it would be the burden of the proponents to mitigate against any deleterious impact to sage grouse because of the location of their transmission towers. The Cooperating Agencies note that the governmental agencies dealing with sage grouse have far different proposals, even involving sage grouse habitat. Governor Otter's Task Force management zones do not correspond with those of the BLM for core habitat for sage grouse, whether it is designated as core or priority. This also frustrates the counties, as the counties are not the agency responsible for analyzing sage grouse habitat, but apparently will feel the effects of those conflicting analyses.	The comment is correct, the State sage-grouse designations are different from the federal designation; the BLM is using the federal version until a new sage-grouse plan is approved. The State's designations are one of the alternatives being considered in that analysis. Current BLM policy precludes siting large infrastructure projects on these lands. Therefore, the BLM has decided to not defer its decision on these segments. The BLM will continue to work with the Proponents and state and local governments to find an acceptable route for the transmission line in these segments. If the sage-grouse habitat classification resulting from the Sub-regional EIS decision is different from the current BLM classification in the area of Alternative 7K, and project construction has not begun in Segment 7; the BLM will consider this new information and determine if its siting decision for Segment 7 should be reviewed.
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	Since the release of the BLM preferred alternatives, the Task Forces have met with local BLM representatives to discuss their concerns. At this point, there does not seem to be any resolution. The BLM is going to hold firm in its preferred alternatives, and let the private landowners fend for themselves. Our task force simply rejects the idea that the only way this project can be permitted is to place it 70-80% on private land	The Counties' position is noted.

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			and have those private land owners bear the burden and the cost of this project. Thus there is no reason for these meetings to continue, the preferred routes are impossible to reconcile and the reasons for such conflicts are not being addressed. The Counties and Cooperating Agencies intend to stand firm in their designation of routes as being the result of a collaborative process with all of the entities. There will be no more need for future meetings with the BLM in anticipation of any further steps. The Counties firmly believe it is the BLM's responsibility to, at this point, come up with preferred alternatives that the counties can accept.	
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	In a separate submission, the counties are requesting the BLM re-analyze buried line technologies as that could provide a great solution which would address the concerns of the task forces as well as the BLM. However, until that process is undertaken, there may be no possible resolution.	The BLM considered burying the line, both AC and DC, in the FEIS (see Section 2.6). The BLM has no authority over what is permitted on private lands but it concluded that burying the line was not preferable across federal lands due to the much greater ground disturbance and cost.
100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	Before reaching the Populus substation near Downey, Idaho, as it runs through Wyoming, Gateway West is proposed as a single line. After Populus, the line splits into a Northern and Southern route. "The Proponents have proposed this split because of the need to serve loads along the way and also to increase reliability." ES-5 That same page notes that "the WWE corridor is too narrow to allow for the required separation from existing transmission lines already in the corridor." Id. Throughout the history of this action, the Proponents have insisted that reliability and separation were major motivating factors in route design. Developments have shown that the split is not necessary to "serve loads" as Idaho Power does not intend to serve loads out of Segments 5, 6, 7, 8 or 9. Rocky Mountain Power generally does not serve any customers in those segments. The real goal is to get electricity from Wyoming to the West coast and Southwest markets. The reliability constraints that are a strong generating factor behind Gateway West are outlined in the Final EIS under 1.3.3. That section talks about common mode failures such as aircraft snagging one line and dragging it into another, smoke from wildfires shorting out more than one line, lightning strikes, high winds, dust storms, ice storms, blizzards, landslides, earthquakes, vandalism and equipment failure. That section goes on to discuss WECC reliability performance standards and separation of transmission lines. This is the justification ostensibly given to splitting Idaho into Northern and Southern routes, and thus doubling the impact upon private property. Discussion of these common mode failures resulted in the EIS declaring "the Proponents state that forcing the Gateway West Project into close proximity to other lines undermines the overall purpose and need of the project." EIS 1-13.	The BLM recognizes that the Counties do not accept the Proponents' project objectives. The agency that regulates utilities has; see Section 1.3.2.

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100681	DOUGLAS BALFOUR, JULIE YEATES	POWER COUNTY, CASSIA COUNTY	<p>Obviously the vast majority of the fears the Proponents have used to promote this project are because the proposed transmission lines would be overhead, outdoor structures. BURIED LINES Due to those concerns many Commentors, including these Cooperating Agencies have suggested that underground alternatives be fully analyzed as part of the EIS. Section 2.6.3 addresses that request, discusses AC underground transmission lines and their history, and concludes that considering AC underground lines to not be "feasible for the project" because of concerns about costs, reliability, and unproven technology. These Cooperating Agencies strongly believe that this rejection of underground alternatives by the Proponents through the BLM to be inaccurate and mistaken. The recent example of the Interstate Natural Gas Pipelines show that underground technology is absolutely feasible for this type of application. This is particularly true given the land proposed to be included in this transmission line project. There have been huge, recent scientific breakthroughs in high voltage DC lines that would resolve many of the issues discussed in Section 2.6.3 of the EIS. HVDC is touted as the transmission method of the future for many reasons. It is far more reliable than above-ground lines, it is able to transmit a current over long distances with fewer megawatt losses and is much more compatible with the sources of energy envisioned for Gateway West. As National Geographic noted in the Great Energy Challenge "For wind farms and solar installations in the Midwest and Rocky Mountain regions, HVDC cables could be run underground in environmentally sensitive areas, avoiding cluttering the landscape with transmission towers and overhead lines." HVDC lines equipped with hybrid breakers, a recent scientific breakthrough, are much cheaper to bury than AC, the type of lines studied in the EIS. They require less insulation and provide the other stability and low electric current losses that are part of a DC system. In a number of applications HVDC is more effective than AC transmission. DC can stabilize a predominantly AC power grid, eliminate problems with prospective short circuits, reduce line costs since HVDC requires fewer conductors and reduce the profile of wiring. HVDC can carry more power per conductor and because HVDC allows power transmission between unsynchronized AC distribution systems, it can actually help stop failures. The directional power flow through a DC link can be directly commanded and thus, this has caused many power system operators to contemplate much wider use of HVDC transmission lines in the future. HVDC lines frequently use submarine or underground cables as they are completely compatible with this technology. HVDC increases system stability and reliability by preventing cascading failures. HVDC allows transfer of power between grid systems running in different frequencies. Such interconnections provide stability to the grid.</p> <p>There are hundreds of HVDC lines, being built throughout the world</p>	Burying HVDC lines is considered in Section 2.6. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.

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			<p>including the United States. Many of those lines are underground for long distances and are truly the technology of the future. Europe, China, South America and Australia all have numerous lines in use and more are being currently constructed. Much of the impact that has resulted in the BLM selecting preferred alternatives largely on private land, to avoid visual restrictions and Sage Grouse impacts on public land, as in this project, could be resolved with underground technology. Underground power lines, particularly HVDC, could be constructed in areas with VRM restrictions or with potential impacts to wildlife. As National Geographic noted, the environmental impact of underground HVDC impacts is much less than the overhead AC transmission lines proposed for Gateway West. One of the major proponents of HV is ABB, a global power and automation technology leader currently involved in the construction of many of the referenced HVDC projects. As ABB notes, "HBDC light technology enables underground and subsea transmission, and offers several environmental benefits, such as neutral electromagnetic fields, oil-free cables and compact converter stations. It is an ideal solution for connecting remote power sources like renewable to mainland networks overcoming distance limitations and grid constraints while ensuring robust performance and minimal electrical losses." Mridul Chadha, December 16, 2012 article. ABB is currently laying many miles of 320 kv HVDC cable with minimal installation expense. Siemens, also a worldwide leader in HVDC, has established new technology that can carry up to 800kv and 7 gw of power. Alstom is the third leading worldwide supplier of HVDC underground cables and has similar experience. Worldwide, there are many HVDC cables being buried for high voltage transmission lines. To name but a few locations, Italy, Namibia, China, Malaysia and other states in Europe all are in the process of utilizing HVDC cables for underground transmission. China has numerous 3,000mw cables coming from the 3 Gorges Dam. Malaysia has a 670km underground cable with 500 kv currently under construction. There are numerous examples worldwide, including some coming to the United States using this technology.</p> <p>The advantages of HVDC technology fit in completely with :the problems associated with Gateway West. HVDC is more efficient with less electrical losses than with the proposed AC transmission line. Higher efficiency means a lower transmission cost, helping renewable energy compete against other power sources. HVDC transmission can enhance the stability, allow the operator complete control of the power flow and facilitate the integration of wind from different resource areas. HVDC transmission lines require a much smaller right of way footprint, using less land and thus have less environmental impact than the equivalent AC lines. Because of these possibilities, and the extreme impact noted with running overhead transmission lines through private</p>	

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			land, the Cooperating Agencies have substantially researched underground HVDC lines. Tetra Tech and the BLM should do the same, as they will come to the conclusion that to resolve many of the problems associated with Gateway West, this technology must be analyzed. This is particularly true, given the fact that construction of the Gateway West Project, and particularly the Idaho segments, is many years away. To forsake this possible solution at this point is not responsible Environmental Analysis. As construction is not scheduled to begin on any part of the Idaho Gateway West project until 2018, at the earliest, the Cooperating Agencies strongly request that the BLM analyze the possibility of underground technology. It simply is not appropriate to proceed further without this analysis.	
100682	ROBBIN ANDERSON		I live where the power lines would "Sandwich" our home as they merged with the substation. Keep the alternative route as proposed by the citizens, BLM + Id Power, so we don't have to move because my dad, who lives with me has an AICD, which cannot tolerate living between lines!	Your support for the Proponents' Proposed Route is noted.
100689	CRAIG MOORE, DAVID MURPHY, C DALE WILLIS JR		<p>I would certainly hope, that after your thorough investigations, you will support the will of the majority of economic Idaho contributors and recommend that the "Preferred Route" be moved back to the PEIS conclusively suggested locations. I would also suggest strongly that your support towards that end occur now rather than waiting for extensive hearings both formal/legal and informal by citizens and other interested organizations. That decision would be both expedient and frugal on the part of government. Following is a list of support premises for the change. LIST</p> <ol style="list-style-type: none"> 1. Elimination of agricultural operational damages from farming changes necessary due to irrigation and other effects from transmission line sighting. 2. Disturbance of Sage Grouse habitat clearly pointed out by environmental organizations. 3. True and Scientific Benefits for the Birds of Prey. 4. Private Party Property Rights and avoidance of subjecting property owners to "Eminent Domain" laws and Court activity to consummate the extensive intrusions necessary to establish private property corridors for transmission lines. 5. Serious health concerns to dairies already proven in numerous cases including an Idaho Power lawsuit in the Magic Valley wherein millions of dollars settlement did come to pass and is on the record. 6. Overwhelming support by State Government, BLM employees County Governments and City Governments and on the record as well as Idaho Power Company. 8. Fair play of Government process towards the Citizens of Idaho after literally years of meetings held, with testimony in large numbers overwhelmingly favoring the prepared study submission of 	It would appear that this comment refers to the routes through the NCA. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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			recommended routes. 9. A letter signed by Brian O'Donnell Executive Director of the prestigious "Conservation Lands Foundation" describing their serious concerns with the "preferred route" thru Owyhee County that seriously affects the Sage Grouse habitat. (I could supply that to you if need be.) In summary, especially since proper measures to air the "other side of the coin" during the formation of the "Preliminary Environmental Impact Statement," I would urge you to insist that all the parties involved should sit down in order to work out a solution prior to the release of the Final Environmental Impact Statement.	
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	It is the prayer of the residents of Ada, Canyon and Owyhee Counties that Segment 8 and Segment 9 of the GWTLTP will be sited in the SRBOP NCA in the FEIS. Respectfully,	Your preference for the Proponents' Proposed Segment 8 and Alternative 9D is noted. The BLM found that the mitigation measures supplied by the Proponents at the time of the FEIS publication did not sufficiently offset the negative impacts of constructing a transmission line in the NCA to a level where it would comply with the NCA enabling legislation.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	3. U.S. District Court for the Northern District of California has established the 2005 Energy Act ET Section 368 as Law. The Department of Interior is now held to a Settlement Agreement.	The intent of this comment is not clear. The BLM does not dispute that the Energy Policy Act of 2005 is a law. The BLM is complying with the settlement agreement.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	11. The NLCS (BLM) have selected their preferred alternatives based on BLM policy. 12. Laws trump policy.	The BLM does not dispute that laws trump policy. The NLCS staff concluded that the routes through the NCA did not meet the enhancement requirements of the law.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	10. The BLM was legally bound to: FLMPA, NEPA, the 2005 Energy Act (section 368) and Public Law 103-64 at the time they adopted the SRBOP NCA RMP and sited the WWE corridor (2008). We contend applying a 2009 Law (National Landscape Conservation System Act) as justification for agency actions prior to the existence of said Law is legally indefensible.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM is required to follow the law.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	8. The BLM's preferred alternative's for Segment 8 and Segment 9 will not be accepted by the residents or elected officials of Ada, Canyon and Owyhee Counties, due to the impact on private property.	Noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	9. It is our contention that Public Law 103-64 was never intended to prohibit future lines into the SRBOP NCA.	Your comment on what the law was and was not intended to do is noted.

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100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	5. The existing ROW's for transmission lines in the Treasure Valley are in the SRBOP. The existing 500 kV line in the SRBOP NCA (the line Segment 8 proposes to parallel) is the only 500 kV line (ROW) in Owyhee County.	The location of the existing 500 kV ROW is not in contention.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	6. Science does not support the GWTLF, or the WWE corridor, to be sited in Idaho Power's proposed Segment 9 or BLM's preferred Alternative 9E.	Constructing two new 500 kV lines in the SRPOB NCA would require several thousand acres of new disturbance and many miles of new access roads in addition to the towers and connector lines. We know of no science that supports the theory that thousands of acres of disturbance and miles of additional roads would benefit the NCA. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	7. Science supports the siting of the GWTLF in the SRBOP NCA. It is our contention Segment 8 and Segment 9 would not be "incompatible" with the existing transmission lines currently located in the SRBOP NCA.	We are not aware of any science supporting the proposition that several thousand acres of new disturbance and many miles of new access road are beneficial to the NCA.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	3. From 2009 to present, citizens and local government have been actively engaged, cooperating with all other effected agencies/groups; developing alternatives, providing ample comment and have been in compliance with the NEPA process et all deadlines.	The BLM acknowledges the effort the county task force has made.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	4. 2009: Idaho Power's proposed route for Segment 8 paralleled the existing 500kv line in the SRBOP. February 2012: The BDO BLM's preferred alternative for Segment 9 paralleled the existing 138kV line in the SRBOP.	This is partially correct. Portions of 9D follow an existing line; a several miles-long portion does not. This is also the case for Segment 8.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	2. It is our contention the scoping processes for the WWE corridor and the Land Use Management Plan for the SRBOP NCA are in violation of Section 368 of the 2005 Energy Act on the following premises: • Exclusion of local government and public input. • Unduly sited on private land sparing the abundantly available Federal land. • Not including this corridor into the SRBOP RMP, following existing transmission lines (ROWs), as defined in section103 (o) of FLPMA of 1976.	Your position in regard to these plans is noted. The development of the WWE corridor and the SRBOP RMP are not part of this project analysis.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	3) 2009 lawsuit filed in U.S. District Court for the Northern District of California against the Department of Interior et al. reached a settlement agreement on July 3rd, 2012. SETTLEMENT AGREEMENT Plaintiffs The Wilderness Society, BARK, Center for Biological Diversity, Defenders of Wildlife, Great Old Broads for Wilderness,	Studies to reevaluate the WWE Corridor are being conducted as part of the land management planning process, as required by the settlement agreement. Where feasible, the Gateway West route and alternatives follow existing transmission lines; many of these are also in the WWE Corridor. The EIS identifies the routes that

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			Klamath- Siskiyou Wildlands Center, National Parks Conservation Association, National Trust for Historic Preservation, Natural Resources Defense Council, Oregon Natural Desert Association, Sierra Club, Southern Utah Wilderness Alliance, Western Resource Advocates, Western Watersheds Project, and County of San Miguel, Colorado (“Plaintiffs”), and Federal Defendants United States Department of the Interior (“DOI”), Kenneth L. Salazar, Secretary of the Interior; United States Bureau of Land Management (“BLM”); Robert Abbey, Director, BLM; United States Department of Agriculture; Tom Vilsack, Secretary of Agriculture; United States Forest Service (“FS”); Tom Tidwell, Chief of the Forest Service; United States Department of Energy (“DOE”); and Steven Chu, Secretary of Energy (“Defendants”)(collectively the “Parties”). This 20-page agreement provides for “addressing periodic corridor reviews”. “The objectives of these settlement provisions are to ensure that future revision, deletion, or addition to the system of corridors designated pursuant to section 368 of EP Act consider the following general principles: location of corridors in favorable landscapes, facilitation of renewable energy projects where feasible, avoidance of environmentally sensitive areas to the maximum extent practicable, diminution of the proliferation of dispersed rights-of-way (“ROWs”) crossing the landscape, and improvement of the long-term benefits of reliable and safe energy transmission. In addition, revisions, deletions, or additions to section 368 corridors are to be made through an open and transparent process incorporating consultation and robust opportunities for engagement by tribes, states, local governments, and other interested parties.”	are within or adjacent to a WWE Corridor. Segment 1W, as an example, follows an existing transmission line and is also within a WWE Corridor on federal land. This route is part of the Wyoming Governor's sage-grouse corridor network. A driving force in establishing the Governor's corridors was the need to concentrate development, rather than create new disturbance across the landscape. Therefore, these corridors follow existing lines. In order to be consistent with the Governor's sage-grouse policy, the new line must be with the Governor's corridor in sage-grouse core habitat. This will be the case regardless of whether this is a WWE Corridor or not; therefore, any change to WWE Corridor would not change the location of Segment 1W. The environmental effects associated with all routes are fully analyzed in this EIS regardless of whether they are within the WWE Corridor or not.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	Interested Stakeholders from Segment 8 and Segment 9 present the following comments in summary: 1. We have established that the citizens and local governments were left out of the processes of adopting a Land Use Management Plan for the SRBOP NCA and for the scoping process for the GWTL and WWE corridor.	The BLM does not agree that the local citizens and governments were left out of the planning process or for the project. The planning records indicate the opposite is true. In regard to Gateway West, Chapter 5 documents the many meetings held with local interests. In addition, BLM conducted bi-weekly conference calls with cooperating agencies. The City of Kuna chose to be a cooperating agency; Owyhee County did not.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	2) The National Landscape Conservation System was established “in order to conserve, protect and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” National Landscape Conservation Act, 16U.S.C. 7202(a)(2009). Secretarial Order 3308 speaks to the management of the Conservation Lands, stating “BLM shall ensure that the components of the NLCS are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.” The 15-Year Strategy for the Conservation Lands reinforces this by stating the “conservation, protection, and restoration of the NLCS values is the highest priority in NLCS planning and management, consistent with the	The statement is not in contention.

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			designating legislation or presidential proclamation.” Conservation Lands Strategy at 8. Recent BLM policy guidance specifically addresses the management of BLM-managed national monuments and NCAs and creates a presumption that BLM will not approve any new ROWs in these areas. Specifically the manual provides: 5. To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designating or authorizing use of transportation or utility corridors within NLCS units. To that end, and consistent with applicable law, when developing or revising land use plans addressing NLCS units, the BLM will consider: a. designating the NLCS unit as an exclusion or avoidance area; b. not designating any new transportation or utility corridors within the NLCS unit if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the NLCS unit was designated; and c. relocating any existing designated transportation and utility corridors outside the NLCS unit. BLM Manual 6100, 1.6J(5).	
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	August 29th 2008 the Scoping Report was released for the GWTLTP prepared for the BLM by Tetra Tech. The West Wide Energy (WWE) corridor is sited on 18.4 miles of private land, 1.1 miles of State land and only 37.6 miles of Federal land; section 9 GWTLTP, Owyhee County. September 2008 the SRBOP NCA Resource Management Plan (RMP) and Record of Decision were adopted prohibiting new transmission lines in the SRBOP. The BLM’s announcement of their preferred alternatives for segment 8 and 9 for the GWTLTP prompted members of the OCTF back into research mode and we present the following:	The 2008 report was not accurate, this was corrected in the EIS, which states in many places that the WWE corridor is only established on public land.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	NCA Enabling Legislation (Public Law 103-64- August 4th1993) SRBOP NCA This legislation provides for continued and future use for grazing, continued military use (the Orchard Training Center), and continued and future use of hydroelectric generation and transmission. The Law goes on to stipulate that the NCA has been adequately studied and is not suitable for Wilderness.	This comment is noted.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	The summer of 2009, in addition to developing alternatives to the GWTLTP, members of the OCTF researched the inception of the GWTLTP and posthumously discovered the following: In 2005 President George Bush signed the Energy Act. Section 368 mandates the establishment of Right-of-Way (ROW) energy corridors on Federal land. Energy Policy Act of 2005 (Enrolled as Agreed to or Passed by Both House and Senate) SEC. 368. ENERGY RIGHT-OF-WAY CORRIDORS ON FEDERAL LAND. (a) Western States- Not later than 2 years after the date of enactment of this Act, the Secretary of Agriculture, the Secretary of Commerce, the Secretary of Defense, the Secretary of Energy, and the Secretary of the Interior (in this section referred to collectively as ‘the Secretaries’), in consultation with the Federal Energy Regulatory Commission, States, tribal or local units of	This comment is noted. The BLM has identified energy corridors on lands it manages, as required by the 2005 Energy Policy Act.

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			governments as appropriate, affected utility industries, and other interested persons, shall consult with each other and shall— (1) designate, under their respective authorities, corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land in the eleven contiguous Western States (as defined in section 103(o) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1702(o)); (2) perform any environmental reviews that may be required to complete the designation of such corridors; and (3) incorporate the designated corridors into the relevant agency land use and resource management plans or equivalent plans.	
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	<p>January 13th, 2012 President Obama sent the Interagency Rapid Response Team for Transmission to Boise, Idaho. The Mayor of Kuna, the OCC and OCTF were in attendance. We shared the information contained in this letter with the Administrators of the nine Federal Agencies. February 2012, the BDO BLM sent a map to the OCC recommending changes to 9D. The BDO BLM changes to 9D were accepted by our OCC at the February 27th, 2012 coordination meeting. The BDO BLM was now identifying 9D as their preferred alternative. Finally we achieved a hard earned, 100% consensus from groups including: Owyhee County citizens, OCTF, OCC, Idaho State Representatives, Governor Butch Otter, the 1st Congressional District, Idaho Power and the BDO BLM.</p> <p>April 2012 Walt George, Steve Ellis and Donald Simpson traveled to Washington DC to bring Idaho Power's proposed route for Segment 8 and the BDO BLM's preferred route for Segment 9 "across the finish line". An e-mail dated April 27th, 2012 from Cecil Werven, BDO BLM, to Karen Steenhof divulged information from the briefing in Washington DC that: "the Washington office wants NO transmission lines in the NCA because it would establish a bad precedent for the NLCS".</p>	This comment is noted. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	September 2012 the BLM released their preferred alternatives for Segment 8 and Segment 9. The BLM's preferred alternative for Segment 8 is Idaho Power's 2009 proposed route, which places it back onto private property. This sent task force members and landowners scrambling to discern where and how the process had failed them and rallying for support to ultimately have this line sited to parallel the existing 500kV line in the SRBOP NCA.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.

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100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	The BLM's preferred alternative for Segment 9 is Alternative 9E. The caveat is that the route has been altered at the SE edge of Oreana and now crosses private property that does not have the consent of the affected land owners.	The 9E route was revised between draft and final to avoid preliminary priority sage-grouse habitat and to avoid impacts to a new subdivision near Murphy. See Section 1.1.1 in the FEIS. While Alternative 9E would cross private property, approximately 95 percent of the route is on public land. Also, it was sited not to pass within 1,000 feet of any residences.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	October 2012 the OCC learned that they had not been, and would not be issued a copy of the Administrative FEIS for GWTLPL. Idaho's Governor Butch Otter extended the services of Idaho's Department Administrator, John Chatburn. Mr. Chatburn submitted Owyhee County's comments via the Governor's office. Bear in mind our comments were made without the advantage of reviewing the Administrative FEIS.	Owyhee County decided not to be a cooperating agency in the project. The State and Kuna are cooperating agencies. Under NEPA rules, administrative drafts are shared with cooperating agencies in order for them to comment and propose changes in the document. Others must wait for the public version. Had the County decided to be a cooperating agency in the Project, it would have had a greater role in the analysis process.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	Segment 9, Segment 9E and altered Segment 9E (the BLM's preferred alternative) are in Sage-Grouse habitat. June 2012 the BLM released the Addendum to the DEIS for the GWTLPL "Effects of the Proposed Project on Greater Sage-Grouse" (please reference). October 12th 2012, The Wilderness Society, Idaho Conservation League, The Nature Conservancy in Idaho and Conservation Lands Conservation Foundation submitted the following correspondence to Mr. Walt George: "BLM's alternative route 9E would pass through identified Preliminary Priority Habitat (PPH) for the Greater Sage-Grouse. Currently, the U.S. Fish and Wildlife Service has found the Greater Sage-Grouse warrants protection under the Endangered Species Act and has committed to a final listing decision in 2015. PPH, as identified in BLM's Greater Sage-Grouse Interim Management Policies and Procedures, IM 2012-043(12/27/2011), "compromises areas that have been identified as having the highest conservation value to maintaining sustainable Greater Sage-Grouse populations" that "have been identified by the BLM in coordination with respective state and wildlife agencies". IM 2012-043 requires additional procedures for pending ROW applications that would affect more than 1 linear mile of Sage Grouse habitat. Segment 9E would have nearly fifty times that level of impact. These procedures include a high level interagency review process for any ROW project that would fail to "cumulatively maintain or enhance Sage Grouse habitat". Allowing development of a large transmission line through this landscape could result in harmful, and potentially irreversible impacts to important Greater Sage Grouse habitat, both by damaging Sage Grouse habitat through the construction and maintenance of power lines and by providing "perches" for raptors and other birds of prey to more easily prey on Sage Grouse."	The 9E route was revised between draft and final to avoid preliminary priority sage-grouse habitat (PPH). See Section 1.1.1 in the FEIS. Approximately 7 acres of PPH are impacted due to improvement of existing roads. Final design, if this route is selected, will avoid impacts to PPH to the extent practicable.
100692	FRANK BACHMAN, ERNIE BREUER,	OWYHEE CITIZENS TASK FORCE	August 9th 2012 Ms. Karen Steenhof, a conservationist and one of the biologists who studied the effects of the PP&L (now PacifiCorp) 500 kV line, submitted the following correspondence to Mr. Carl Rountree,	The FEIS does not dispute that new towers would attract raptors and ravens. However, selecting the route the County favors would result in thousands of acres of ground disturbance and the

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	LEAH D OSBORN, ROBYN C THOMPSON		<p>Director, NLCS: “A new transmission line in Owyhee County (9E) would attract raptors and ravens and could lead to increased predation on declining Greater sage-grouse populations. Golden Eagles prey on adult Sage Grouse, and Common Ravens are a major predator of Sage Grouse eggs. Recently, Idaho State University (ISU) biologists have noted a dramatic increase in the predation of Sage Grouse by ravens. Where there are more ravens, nesting female Sage Grouse stay on their nests much longer, leaving less often. Less time foraging may cause “substantial physiological distress” on the Sage Grouse. It would be better to attract raptors and ravens to cheatgrass areas in the NCA where they feed on ground squirrels than to shrubsteppe areas inhabited by sage-grouse in Owyhee County. In 1981, less than a year after Secretary of the Interior Cecil Andrus withdrew 482,000 acres of public land to protect birds of prey nesting in the Snake River Canyon in southwestern Idaho, Pacific Power and Light Company (PP&L: now PacifiCorp) began construction of a 500-kV transmission line across what is now the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). Raptor Expert Morley Nelson assisted PP&L with routing the line so it would not adversely affect raptors and with designing platforms for transmission towers that would encourage raptor nesting (Nelson 1976, Nelson and Nelson 1982). From 1981 through 1989, Bureau of Land Management (BLM) and PP&L biologists monitored the response of raptors and ravens to the transmission line (Engel et al. 1992, Steenhof et al. 1993). They found that the 500-kV transmission line within the NCA enhanced opportunities for raptor perching, nesting, and roosting. Unlike smaller distribution lines, large transmission lines do not present an electrocution hazard for large birds because the wires are too far apart for raptor wings to contact more than one wire at a time. Collision with transmission lines does not appear to be an issue for birds of prey in desert environments. Raptors and ravens were attracted to the 500-kV line, and productivity of hawks and eagles nesting on transmission towers was as good as and sometimes better than that of those nesting in the canyon. In some cases, transmission line towers provided more secure nesting substrate than natural nesting sites. By 1989, 8 pairs of Golden Eagles, 11 pairs of Ferruginous Hawks, 33 pairs of Red-tailed Hawks, and 81 pairs of ravens were nesting on the transmission line between Midpoint, Idaho and Summer Lake, Oregon (Steenhof et al. 1993). In addition, biologists documented 13 communal night roosts of Common Ravens on the transmission line, including one roost on transmission line towers within the NCA with more than 2100 ravens, one of the largest raven communal roosts ever documented in the world (Engel et al. 1992). Ravens used the roosts from spring to autumn, and as many as 700 roosted on a single tower.”</p>	<p>miles of new roads within the NCA. This would not meet the enhancement requirements of the law.</p>

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100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	Hundreds of pages of research and comment on Segments 8 and 9 were submitted to Mr. Walt George by the October 28th 2011 deadline.	The BLM received the research and comments from the task force.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	The BLM did not designate preferred alternatives in the 3,150 page DEIS.	The statement is correct' the BLM did not designate a preferred route in the DEIS. The reason is explained in Section 2.9.1 of the DEIS.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	We did not become aware of the above or the Gateway West Transmission Line Project until spring, 2009. In April /May 2009 we began to organize after learning about Segment 8 and Segment 9 of the GWTLTP. Residents of Kuna and Melba formed a diverse group and bore the expense of hiring Environmental Conservation Services, Inc. (Segment 8 Task Force). Residents of Owyhee County formed the Owyhee County Task Force (OCTF aka Segment 9). The OCTF is fortunate to have local resident Karen Steenhof, a former BLM and USGS raptor biologist, as a member. Boise District Office BLM (BDO BLM), Idaho Power Engineers, Tetra Tech and local elected officials were in attendance at the meetings of both groups. These groups worked over the summer of 2009 to develop alternatives to Idaho Powers proposed Segment 8 and Segment 9. Their mission: to diminish the impact of the GWTLTP on private property. It must be noted that only 17% of Owyhee County is privately owned. Thus, the OCTF required that the GWTLTP not impact private property without the consent of the landowner. Representatives from Segment 8 attended the OCTF meetings. Representatives from the OCTF attended Task Force meetings held in our adjoining counties ensuring our alternatives lined up and the needs of all Idaho residents were being met. Due to the geographical location of Segment 9 the OCTF also cooperated with the United States Air Force and affected Shoshone Paiute Tribes. Our local state representatives, 1st Congressional District and Governor were continually apprised as to the activities of both groups. Both groups met the September 4th, 2009 BLM deadline and submitted alternative proposals into the Draft Environmental Impact Study (DEIS) for the GWTLTP. The Segment 8 alternative proposal parallels the existing PacifiCorp 500 kV line in the SRBOP NCA. The Owyhee County Commissioners (OCC) submitted two alternatives for proposed Segment 9. 1) 9D: paralleling the existing 138kV Idaho Power line in the SRBOP. This was the only proposal accepted by the OCC and citizens of Owyhee County. 2) 9E: the southern proposal, was not accepted by the OCC and citizens of Owyhee County.	Your comment that you became aware of the project in 2009 is noted. Scoping for the project began in 2008 and included public meetings in Murphy and Boise. The BLM held a meeting with Owyhee County to discuss the project on May 19, 2008 (see Table 5.1-6 in the FEIS). The BLM is aware that citizens worked on proposals and submitted proposed routes to the BLM.

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100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	November 12th 2009 Idaho Power held a public meeting in Kuna, Idaho. We learned at that meeting that Idaho Power had changed their proposed route for Segment 8: to parallel the existing 500kV line in the SRBOP. Segment 9 remained as proposed, on private land in the West Wide Energy (WWE) corridor. The OCC and OCTF members continued to meet with the BDO BLM in an attempt to discern their dissatisfaction with Alternative 9D. June 2011 the DEIS for GWTLTP was released. Volume 1b Ch 3.18- 18 thru 3.18-25 contains data supplied by Cassia and Power Counties detailing the hindrances GWTLTP will have on farming operations and crop production. This data also applies to Kuna, Melba and Owyhee County. Owyhee County's economy is 74% agriculturally based. We refer you to 3.18-38 thru 3.18-40 referencing Segment 8: documenting the negative effects a 500 kV line would have on prime farmland, livestock grazing, crop production and dairy farms. Pgs. 3.18-40 thru 3.18-42 address these topics for Segment 9. We found the chapters on visual resources, cultural resources, socio-economics, environmental justice and electrical environment range from inadequate to inaccurate	These comments are noted.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	9E is in Sage Grouse habitat.	The 9E route was revised between draft and final to avoid preliminary priority sage-grouse habitat (PPH). See Section 1.1.1 in the FEIS. Approximately 7 acres of PPH are impacted due to improvement of existing roads. Final design, if this route is selected, will avoid impacts to PPH to the extent practicable. The route does impact general sagebrush habitat.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	9E would be blight on the Owyhee Front	The location of 9E is shown on Figure A-11. It generally lies between the Owyhee Mountains and Highway 78. The effects on scenery are discussed in Section 3.2.2.3. The FEIS states that the effects on scenery would be moderate to high.
100692	FRANK BACHMAN, ERNIE BREUER, LEAH D OSBORN, ROBYN C THOMPSON	OWYHEE CITIZENS TASK FORCE	Rosey Thomas from BDO BLM insisted on Alternative 9E at the June 18th 2009 OCTF meeting. She was adamant that the OCTF submit 2 alternatives. The citizens of Owyhee County have objected to 9E from its inception	Owyhee County Task Force submitted two proposals; one of these was the original 9E. The County was clear that 9E was not their preferred route.
100693	DOUGLAS BALFOUR	POWER COUNTY, CASSIA COUNTY	The Counties believe that failure to thoroughly analyze this technology leaves the Environmental Impact Statement inadequate under NEPA and very vulnerable to challenge.	Burying HVDC lines is discussed in Section 2.6.3.4. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
100693	DOUGLAS BALFOUR	POWER COUNTY, CASSIA COUNTY	Thank you for the opportunity to meet with you and discuss the need for a detailed and fair analysis of other transmission possibilities. As we discussed in the meeting and is clear from the literature, underground HVDC is certainly a viable technology that would resolve many of the substantial objections to the Gateway West project. Underground HVDC has numerous advantages over overhead AC high	Burying HVDC lines is discussed in Section 2.6.3.4. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost. Burying the line along the Proposed Route for Segment 7 is estimated to cost an additional 1.5 to 2.6 billion dollars. Even if costs could be reduced by half, the cost would

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			<p>voltage transmission lines. Obviously burying a cable could be done in the right of way following the interstate highway, which would also alleviate costs of compensating land owners for a right of way. That location has been successfully used for the location of buried cable throughout Europe and in the Eastern United States. Thus problems with disturbance of agriculture and public roadless areas, interference with sage grouse, wildfire issues and access would all be resolved. This seems like a very obvious fit for Gateway West as the existing interstate highway system would be a natural site.</p> <p>Even if following I-15, I-86 and I-84 would not work, the fact that HVDC could be placed underground in other areas would accrue the same benefits. Sage grouse, visual resources and interference with irrigation systems would not be an issue.</p> <p>The objection from the Proponents of Gateway West had been to the cost of buried AC lines, however those costs were never documented or studied and were just used as a reason to dismiss that possibility. We do not have any personal knowledge that Idaho Power has ever studied the cost of underground lines, let alone HVDC. But as we have learned through our limited research, cost is quickly becoming a non-issue. We previously provided you with information that was 4-5 years old, showing that costs had been greatly reduced on underground HVDC. We have continued our research. Cigre is the International Council on Large Electrical Systems. http://www.cigre.org/ They list their title as “The forum for electrical innovation” and their aim is to allow engineers and specialists from all around the world to exchange information and enhance their knowledge related to power systems. Reviewing their website and purchasing some of their papers shows information that is very interesting for the Gateway West Project.</p> <p>HVDC technology is now, cheaper than overhead AC wiring. The hardware costs for the wires, etc. are less and going down. Further, underground applications have the obvious reliability advantages of not being subject to storms, wildfires and the like. Underground HVDC is widely used in Europe and is almost the only system used for high voltage transmission lines. 500 kv lines are fully compatible with underground HVDC. The technology is evolving very rapidly, as a review of the Cigre website shows. Currently the HVDC converters are at a lower megawatt level than proposed for Gateway West, however, that is merely a matter of time, as the demand has only been for 1k megawatt converters and those are the ones being produced. Certainly by the time Gateway West is built, HVDC underground technology will have evolved to the point that it is completely compatible, and that 3K megawatt converters can be built. We have previously reported that HVDC is preferred for wind generated resources and has much lesser line losses than overhead AC. Stray voltage is not a problem.</p> <p>Hopefully the BLM and Tetra Tech will be encouraged to make a</p>	<p>still be significantly higher and burying the line would result in significantly greater ground disturbance. It is extremely unlikely that the cost of placing lattice towers 1,500 feet apart and stringing lines between the towers would ever be comparable to the cost of digging a deep trench across rugged of terrain for a thousand miles.</p>

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			thorough evaluation of underground HVDC. The technology is evolving rapidly in Europe and is projected to be perfect for Gateway West. With increased converter capacity and improved efficiency, HVDC is “green” and a perfect fit for delivery of renewable energy. With advancements in converter technology, that soon should become true for the entire system.	
100694	BOB NAEREBOUT+B1 42	IDAHO DAIRYMENS ASSOCIATION INC	<p>I am writing to make you aware of concerns the Idaho Dairymen’s Association (IDA) has over the proximity of alternate routes for the Gateway West transmission line to dairy operations in Idaho. Our concern, with the alternate routes’ proximity to dairy farms and agricultural ground, centers on the economic impact of taking irrigated ground out of production, and for the potential of stray voltage to negatively impact our dairy producers viability. The Idaho dairy industry is the largest segment of the rural Idaho community with milk sales generating \$2.5 billion annually which is 33% of the total Idaho agricultural receipts. The IDA was established in 1944 with the purpose of developing and sustaining an economically viable Idaho dairy industry. In 2003 the IDA formed the Idaho Dairy Environmental Action League (IDEAL) to address environmental and legal issues such as this. We believe the alternate route challenges our ability to “sustain” certain operations and we would greatly appreciate your willingness to take into consideration those concerns when determining where the transmission lines should be placed.</p> <p>Stray voltage is not isolated to Idaho and several court decisions have found in the favor of dairy operations in Idaho and across the United States because of the negative impact of stray voltage on those operations. The most recent case we have been following has been tied up in the Utah court system for the past ten years. That case involves dairy producers located by the Intermountain Power Project (IPP) located in Delta, Utah. The Idaho dairy industry through IDA and IDEAL is willing to invest, if necessary, the time and resources that would be required to protect their animals, property and economic viability. The Gateway West alternate route in the Kuna, Idaho area places the transmission lines within a quarter of a mile of some of our dairy operations. That close proximity to dairy operations raises major concerns for our industry. I have attached three technical articles that discuss induced voltages from transmission lines that will help explain our concerns with having high voltage transmission lines in close proximity to dairies. The articles discuss potential stray voltage issues with a distribution line running parallel to a nearby transmission line leading to stray voltage on customer property. The articles also provide results of computer modeling on various system attributes that could contribute to stray voltage from transmission lines.</p> <p>This is a serious issue to our industry, providing an adequate buffer between our dairy operations and the transmission lines is critical.</p>	<p>The EIS agrees that stray voltage and electric shocks can cause problems under certain circumstances. These issues are discussed in Section 3.21. We have shared your concerns with the Proponents, who responded that: "Due to the routing, distance to adjacent facilities, and design of the transmission line, the proposed line should not pose a concern. The Proponents expect to continue to receive and respond to questions about stray voltage and transmission lines and have programs in place to provide on-site testing and education to address these concerns." The analysis in the FEIS is based on indicative engineering. Final siting will follow all safety and permitting requirements. Note that the County is the permitting authority for private land in Idaho, not the BLM.</p>

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100746	EDMUND V BRAND, CAROL BRAND		Please let the record show that we are VERY STRONGLY OPPOSED to the construction of the Gateway West Power lines over private property!!!	Your opposition is noted.
100746	EDMUND V BRAND, CAROL BRAND		We INSIST that this power line be sited in the Birds of Prey area paralleling the existing transmission line using a new existing road that was built in 2009 with Obama stimulus money.	Your preference for building the lines in the NCA is noted. The reasons for identifying the preferred route are discussed in Section 2.4.1.1 of the FEIS.
100746	EDMUND V BRAND, CAROL BRAND		According to BLM bird researchers and biologists, these transmission line are very suitable for hawks, eagles and other birds of prey as roosting sites. Since there are already lines in this area and they are not presenting any problems,	Constructing two new 500 kV lines in the SRPOB NCA would require several thousand acres of new disturbance and many miles of new access roads in addition to the towers and connector lines. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.
100746	EDMUND V BRAND, CAROL BRAND		why completely spoil other pristine landscapes over the wild Owyhee desert?? Government officials in Washington apparently have no appreciation for our fragile desert lands!! Those of us who make our homes here love the stark beauty of the wild, unspoiled landscapes.	The EIS recognizes that views of the landscape would be adversely affected by a new transmission line; see Section 3.2. This would be the case whether the line is routed through the NCA or west of Highway 78.
100748	DANIEL FELL		There is absolutely no need for dual routes both north and south of the river.	The reason that two lines are proposed is included in Section 1.3.
100748	DANIEL FELL		There is no legitimate reason why this monstrosity is being routed through suburban Meridan and Kuna. It's unfortunate that these plans are submitted for public review only after decisions have already been made, both by Idaho Power and by the BLM.	Refer to Section 2.4 for the reason the route near Kuna is preferred.
100748	DANIEL FELL		Route this through the desert south of the Snake River and keep it out of my neighborhood	You preference for a route south of the Snake River is noted.
100749	KRIS KALANGES		This is just a general comment. I am an out of state property owner. Based upon the information in the EIS I support the BLM preferred alternative route of 8B. It seems it will be the most cost efficient in terms of both initial construction as well as ongoing maintenance and upgrades	Your support for 8B is noted.
100749	KRIS KALANGES		It also appears to have the least impact on the Birds of Prey area as well as the Air National Guard range.	Alternative 8B would avoid the NCA.
100749	KRIS KALANGES		Although it may impact some residential property owners, it seems steps could be taken to minimize that impact such as the creation of a green space along the urban impact zone of the transmission lines. Where I live in Gresham, OR, they have done just that with a high power transmission line corridor, adding walking paths and other natural enhancements. Is it perfect? No. But it is a viable alternative to which affected residents seem to have adapted quite well.	Your comments on mitigation are noted.
100749	KRIS KALANGES		The bottom line is that the region will need additional power for future growth. That plan which offers the greatest economic efficiency, both to construct and maintain, with the least impact on the environment and residential quality of life should be the chosen route. I believe that is alternative route 8B.	The EIS discloses the need to upgrade the power grid in Chapter 1.

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100750	KELLEY PHILLIPS, MARC PHILLIPS		We live just outside of Kuna near the crossroads of Cloverdale and Kuna Mora Rd. We feel very strongly that the transmission line should not go through our area.	Your opposition to the preferred route, which included Alternative 8B, is noted.
100750	KELLEY PHILLIPS, MARC PHILLIPS		During the winter and early spring months there are hundreds of thousands of wild ducks, Canadian, White Fronted and Snow Geese that congregate in this area feeding on the farmers corn fields. During the early evening hours we have watched the wild birds coming into this area from all directions. They form into a giant flying funnel of birds, taking turns going to eat in the fields where there are so many of them that they blacken the field. We are very concerned about the implications of this power line to the wildlife.	The effects on migrating birds (and other wildlife) are included in Sections 3.10 and 11. Note that WILD-3 requires the following: The Project will be designed and constructed in compliance with Avian Power Line Interaction Committee (APLIC) standards (APLIC 2006, 2012) in order to reduce impacts to avian species. Any changes to the Project's design, as requested by federal, state, or local jurisdictions, as well as any changes considered by the Proponents, will also be in compliance with APLIC guidance. The ROD includes mitigation for impacts to migratory bird habitat.
100751	ROBERT MCKIM	STATE OF WYOMING, LEGISLATIVE DISTRICT 21	I wish to express my objection to the proposed path in the Southwestern, western part of the line near Cokeville, Wy. The transmission lines are being placed near the small community residences while alternate land has been made to run the line at a distance from the town. I do not feel this is in the best interest of the people of Cokeville, Wy. and request you consider working with the land owners on their proposal.	The BLM has continued to consult with local stakeholders on the route near Cokeville and has analyzed several route variations (see the ROD). The route is constrained in this area due to the need to conform with the Governor's sage-grouse policy.
100753	ROBERT L & LYNNE J HATHAWAY		I do not see the impact to property owners who are not agricultural. My property, although only slightly touched by the primary route, is my retirement property. I purchased it 28 years ago and now that I'm within just a few years of retirement I find that the transmission line will be within a few hundred feet of the ideal building spot for my home and now instead of an unobstructed view to the South and the Uinta mountains, I'll be looking at power lines! I'm assuming these power lines are similar to what was just run through Tooele while I was on Active Duty with the military over the last year. They definitely detract from the beauty of the natural landscape, as do the roads that were cut to complete the installation. Is there an option for the BLM to swap my 40 acres for 40 acres that will not be impacted by this project?	The final siting of the Project on private lands will be determined through the state and local permitting processes. The Project Proponents will also need to negotiate with individual landowners during the easement acquisition process. The BLM does not have the authority to permit the project on private lands. Effects related to private property values are assessed in Section 3.4 of the FEIS, and visual impacts are discussed in Section 3.2 of the FEIS. Land exchanges are beyond the scope of this project EIS.
100754	GARY GILBERT		I am the ranch manager for Leone/John Hay with land in section 25 just south and east of the Fort Fred Steele Historical sight. We have a house along Fort Steele Road between the State Rest Area and the Fort and have several neighbors on each side. The initial proposals (now marked 2A and 2B) would have been directly across our land and very, very near to our physical dwelling. They would have been within 1/2 mile of at least 2 separate bald eagle nests that we know of. The lines also would have been expected to cause problems with our cattle, horses and most importantly our children (ages 5 & 7.) The current proposed/preferred route crosses Interstate 80 prior to getting close the North Platte River and we agree that crossing there makes much more sense than crossing so near to our houses and the Historical Site at Fort Steele. We would appreciate if the lines stay to the south of I80 as they cross the N. Platte River and feel it would be much less disruptive to the human and wild life.	The line was moved out of the WWE Corridor in order to reduce impacts to the community in response to comments on the DEIS.

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100755	TIFFANY PINILLA, VICTOR PINILLA, ROD RUNYAN, JAMIE RUNYAN		The gateway west transmission line project would be better off to use segment 9 support by blm purpose route south side salmon falls creek because the north side will cause lots of problems with farm ground and private land	The BLM's preferred alternative in the Salmon Falls Creek area was selected, in part, in order to avoid impacts to the irrigated farmland.
100756	WESTON HAWKES		The citizens of the western United States are saddled with majority percentages of the land in their states belonging to the federal government. Admittedly there are some benefits that come from this relationship. One of the benefits should be that projects such as this one are build on federal lands. Our economy will suffer with the permanent loss of valuable farmland. Put this line on BLM desert land where it does the least harm to people. People are far more important than any weed, bug, bird, snake or other animal, endangered or not. This project is to benefit the public. Put it on public land!	The BLM is obligated to protect listed and sensitive plant and wildlife species. It is an important, but not the only, consideration in planning projects such as Gateway West.
100757	JAMES AND MARY FREELAND		Regarding the rout for the transmission line in the Melba Idaho area. The line should go as far south of the snake river as possible and stay in Owyhee County. That would be the BLM preferred Alternate south of the snake river. This area is not good habitat for wild game or sage grouse in particular	Your support for the BLM Preferred Alternative for Segment 9, inclusive of 9E, is noted.
100757	JAMES AND MARY FREELAND		The rout shown through the Melba is absolutely not acceptable. It would be extremely harmful to our valley and community. Please keep it out of Canyon county.	Your opposition to Alternative 8B of the BLM's Preferred Alternative to Segment 8 is noted.
100758	ROBERT PERDUE, SARAH PERDUE, CRISTA VESEL		I am a homeowner who lives near the proposed Gateway West Transmission Line Project corridor. In fact, the proposed lines would run less than 1/2 mile from my house. I am very concerned about this location for the following reasons: <ul style="list-style-type: none"> • These lines would be in full view of my home and local residents would have to drive directly by them to reach my home. This will definitely affect the value of my home in a negative way. 	The effect on property values is included in Section 3.4.2.2. This discussion focuses on property crossed by the transmission line. However, one study found that properties within 50 feet of a transmission line have property values that are 6 percent to 9 percent lower than the values of comparable properties. It also found that this reduction in value tends to decrease over time. A recent study in Montreal found that direct views of a transmission line tend to reduce residential property value by roughly 10 percent (Des Rosiers 2002). Other studies found lower effects on property values.
100758	ROBERT PERDUE, SARAH PERDUE, CRISTA VESEL		<ul style="list-style-type: none"> • I am very sensitive to electricity and have had problems with power lines in my vicinity in previous locations, which caused me physical distress. 	We are sorry to hear this. Generally, people half a mile from a 500 kV transmission line are not affected. Note Figure 3.21-4 in Section 3.21, which shows that the electric field drops to near zero within 150 feet of the edge of the ROW (e.g., within 250 feet of the centerline).
100758	ROBERT PERDUE, SARAH PERDUE, CRISTA VESEL		The alternate route, through Birds of Prey, would run through a very isolated area that would not impact humans to nearly the degree of the current proposal. I understand that preservation of wildlife is very important and should be considered. However, as a licensed Master Falconer, I also know that birds of prey and other wildlife can safely coexist with such power lines - as long as the lines are the newer design, which prevents accidental electrocution. I have already contacted Idaho Power to fix some older electric lines in my neighborhood, which they	The EIS states that the connectors on 500 kV lines are too far apart (19.5 feet) for a raptor to electrocute itself (Section 3.10.2.2 of the FEIS); however, the BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared. The BLM will continue to work with local interests to find a consensus route if possible. Note that the line on the maps

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			did graciously and without any problems (even the old lines are a quick fix). Please do not run the lines through our housing area! Alternative routes exist that are a much better choice.	in the EIS is based on indicative engineering; the actual route has not been designed. Efforts to reduce effects on landowners would be included in the design where feasible.
100759	ALICE & PAUL PLINE		Putting the line along Melba Road will have a tremendous effect on the landing strip and the ability of all planes to utilize it. Paul and family own the landing strip and is in the midst of setting up a corporation so that the strip will be family owned. Private planes mostly use the strip now. There are maps available that show the strip as Melba City Airstrip.	The line on the maps in the EIS is based on indicative engineering; the actual route has not been designed. Efforts to avoid landing strips would be included in the design. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100796	ALBERT ERRAMOUSPE, MIKE ERRAMOUSPE, JOHN ERRAMOUSPE, DEBRA ERRAMOUSPE, BETTY ERRAMOUSPE		My Father (Albert Erramouspe) owns parcels RP0160900 and RP0161500 and my Uncle (Mike Erramouspe) owns parcels RP0161100 and RP0161400. My family no longer owns parcels RP0163600 and RP0163500 even though the online map still reflects us as owners. We sold the latter two parcels of ground in 2009 because they were harder for us to maintain, less desirable ground than the land we retained, and we had a buyer who wanted the ground for hunting and cattle ranching purposes similar to our own.	Noted.
100796	ALBERT ERRAMOUSPE, MIKE ERRAMOUSPE, JOHN ERRAMOUSPE, DEBRA ERRAMOUSPE, BETTY ERRAMOUSPE		We have raised cattle and hunted deer and elk on the parcels of ground our family retained for many years. This farm represents a multi-generation family farm and hunting area that we have taken great care to maintain. One alternative proposal for building the Gateway West Transmission Line (alternative 5A) comes right through the middle of our farm (both lines). The Erramouspe Family is vehemently opposed to this alternative and feel it will cause irreparable harm to the land and what we have maintained it for, especially the hunting environment. The amount of roads required to be built just to erect the towers as well as the immense size of the towers and lines themselves would forever change the intent for which the farm is maintained in our family. The proposed lines would enter and exit our property from private property owned by other farmers who border us. It seems that in the case of our neighbors' farms and the Erramouspe Farm, the impact of the line would maximize negative effects on private property owners. This seems especially inappropriate with the large amount of BLM ground bordering the Erramouspe Farm on the North end. We have no intention in selling these remaining parcels of land but the devaluation of the land due to the proposed project, especially as it pertains to the use of the land as a hunting area, would be staggering. We sincerely request that you do not pursue this alternative as a viable option.	The reasons for selecting the BLM's Preferred Route for Segment 5 are found in Section 2.4.1.1.
100798	ERIC BARLOW		It is my understanding that a routing alternative has been proposed in proximity to the Town of Cokeville. This alternative routing would minimize the corridor's impact on the community and I request it be adopted. This community/ citizen based solution is of paramount importance as they will live in perpetuity with the result of the EIS	The BLM has continued to consult with local stakeholders on the route near Cokeville. The route is constrained in this area due to the need to conform with the Governor's sage-grouse policy. The BLM has analyzed several route variations in the Cokeville area; see the ROD.

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			actions. This is exact result a proper environmental review process should embrace to find solutions to socio- economic impacts and land use concerns which are organic to the community involved. Please accept the citizen/ landowner proposed route in the Cokeville area.	
100799	GINA MILLARD		I love the land- please put the line with the current lines at Birds of Prey. It will diminish the impact to lands, people and animals.	Your preference for routing the line through the SRBOP is noted. As stated in the FEIS (Section 2.4.1.1, as well as in Section 3.17, and Appendix F-1), the BLM found that the proposed mitigation and EPM measures provided for the Proponent's Proposed Route for Segment 8 and other Alternatives for Segment 9 that crossed the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100800	TIMOTHY JOHN BRENDA & CAROL HERRMANN		I am very concerned with this line coming in so close to my home and it follows al the way down the only road into my home. I have a pace maker and know for fact that these high voltage lines mess with my pacemaker. When I got my first pacemaker we had a farm with one of these lines on the farm, I could not go near it with out shutting me down. Then Idaho power came to my father in law and bought a second easement for another line, well idaho power paid me 5000.00 to move away from the farm which we did, now you didn't use that easement because of the Japanese camp was on that line. You say you did an impast study, did you study anything about what it will do to me, no! You didn't even talk to me or ask any of use going to be near this line. I guess I'm going to find an attorney to help me with this. I'm not just going to give in.	The BLM conducted numerous public meetings on the Gateway West Project to collect public comments and deal with landowner issues. See Chapter 5. The electric field created by the line is discussed in Section 3.21 of the FEIS. The field falls to near zero within 100 feet of the edge of the ROW, see Figure 3.21-4.
100801	KEN & CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	It is my understanding that the state of Idaho gave the counties the right to determine where a corridor may be routed. The counties have selected 7K.	This is correct. The BLM does not permit transmission lines or any other projects on private lands. The county has this authority in Idaho.
100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	It is disappointing that BLM has ignored the counties proposal of 7K and instead chose route 7C. Route 7C is an even worse alternative than the original route 7	The County-preferred route (7K) would cross 55.1 miles of private land, compared to 85.8 for the preferred route but it is approximately 30 miles longer. Construction costs would be approximately 60 million dollars more than the preferred route based on the line drawn across the map by the counties. An actual design would likely be somewhat longer (see Figure 2.4-3 for an example) and, therefore, more costly. Alternative 7K would impact 1,386 acres of preliminary priority sage-grouse habitat (PPH) compared to 149 for the preferred route. The BLM could not select a route with that level of impact to PPH.
100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	Route 7C would severely impact a greater active grouse lek area, a much larger sagebrush habitat	Alternative 7K would impact 1,386 acres of preliminary priority sage-grouse habitat (PPH) compared to 149 for the preferred route. The BLM chose Alternative 7C as part of the Preferred Route because it avoids the Parting of the Ways Trail (see Section 2.4.1.1).

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100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	Route 7C would severely impact a greater active grouse lek area, a much larger sagebrush habitat, steeper highly erodible land	Soil impacts are disclosed in Section 3.15.2.3. Most of the soil along the preferred route for Segment 7 is considered highly susceptible to water erosion.
100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	Original route 7 has fewer issues than 7C and has one advantage. This segment of original route 7 has the ability of being sited down the side of a county road that has no existing power lines. I understand that BLM sees the Parting of the Ways as an issue; however, it is a small area and should be easy to site around it. After all, the private land owners are being expected to make compromises for this project; I think BLM can do the same concerning the Parting of the Ways.	In some respects, the Proposed Route has fewer adverse effects than the Preferred Route; however, the BLM's Preferred Alternative for Segment 7 minimizes visual impacts, avoids the National Historic Trails site called "The Parting of the Ways," and avoids BLM-identified PPH. See Section 2.4.1.1 of the FEIS for details.
100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	several deep wells	The county is the permitting authority for private lands in Idaho. Final routing of the line on private property will have to comply with all permitting regulations. Final siting will be decided in coordination with Proponents, public landowners, and the county.
100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	and more residences.	The county is the permitting authority for private lands in Idaho. Final routing of the line on private property will have to comply with all permitting regulations. Final siting will be decided in coordination with Proponents, public landowners, and the county.
100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	Route 7C would severely impact a greater active grouse lek area, a much larger sagebrush habitat, steeper highly erodible land, an area with virtually no roads	In some respects, the Proposed Route has fewer adverse effects than the Preferred Route; however, the BLM's Preferred Alternative for Segment 7 minimizes visual impacts, avoids the National Historic Trails site called "The Parting of the Ways," and avoids BLM-identified PPH. See Section 2.4.1.1 of the FEIS for details.
100801	KEN AND CINDA WOODWORTH, DELMAR L WOODWORTH	CLEFT OF THE ROCK FARMS, WOODWORTH FARMS,	to the east and towards the west an area with more pivots	Final routing of the line on private property will have to comply with all permitting regulations. Final siting will be decided in coordination with Proponents, public landowners, and the county.
100802	GARY BAILIFF, WALLY JOHNSON, JOHN KOLB, MARK KOT, DON VAN MATRE, REID WEST	SWEETWATER COUNTY, SWEETWATER COUNTY, BOARD OF COMMISSIONERS	As a result of its review of the Final Environmental Impact Statement (FEIS) for the Gateway West Transmission Line Project, Sweetwater County supports the Bureau of Land Management's (BLM) Preferred Alternative Route across Sweetwater County	Your support for the BLM's Preferred Routes for Segments 2, 3, and 4 through Sweetwater County is noted.
100802	GARY BAILIFF, WALLY JOHNSON, JOHN KOLB, MARK KOT, DON VAN MATRE, REID WEST	SWEETWATER COUNTY, SWEETWATER COUNTY, BOARD OF COMMISSIONERS	In order to ensure that the selected route addresses the County's socio-economic, permitting and land use concerns, Sweetwater County welcomes the opportunity to work with the BLM, the State of Wyoming and Rocky Mountain Power through the required Wyoming Industrial Siting Council and the Sweetwater County Development Code permitting processes. Since Sweetwater County is a neighbor to Lincoln County and both counties are members of the Coalition of Local Governments, Sweetwater strongly encourages the BLM to select a route through Lincoln County that is approved by the Lincoln County Board of County Commissioners. This position is backed by many	Your support for the process of collaboration on the route through Lincoln County is noted. The BLM and Proponents are continuing to work with local stakeholders to resolve routing concerns. Several route variations were analyzed following a meeting with local stakeholders. Refer to the ROD for details.

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			Sweetwater County residents who work, recreate and own property in Lincoln County. Sweetwater County will strongly support the Lincoln Board of County Commissioners preferred route for the Gateway West Transmission Line through Lincoln County. Since the Coalition of Local Governments (CLG) represents both Lincoln and Sweetwater Counties and the Conservation Districts affected by the Gateway West Transmission Line, Sweetwater County endorses and joins in comments submitted by the CLG regarding this FEIS. Sweetwater County is very appreciative of the professionalism and the willingness of the BLM, the Consultants and the Proponents to work with the Cooperators and the County throughout this NEPA process.	
100803	H RYAN WESTON		I have been looking the proposed maps over again and have made comments in the past. I want you to know I do not approve of the proposed rout in Arbon. The "5A" alternate would be more beneficial. The proposed rout in red is literally within feet of the Arbon Elementary School and NOT acceptable. There are many houses along the area also	The red route on the map is the Proponents' proposed route, not the BLM's preferred route. The route labeled 5A crosses near the school; it is also not part of the BLM's preferred route. The BLM's Preferred Route follows 5B, this route is several miles south of the school.
100803	H RYAN WESTON		The "5A" alternate would be more beneficial. The proposed rout in red is literally within feet of the Arbon Elementary School and NOT acceptable. There are many houses along the area also. The 5A alternate would impede hardly any houses and would not be near the elementary school.	Your opposition for the proposed Segment 5 is noted. The preferred route follows 5B, it is not near the school.
100805	JOHN DEROOS		I live on Pleasant Valley Rd. in Kuna, Id. I moved here to enjoy the peace and solitude of the Idaho land. Private land. This proposed transmission line would be directy placed on my property, private property, just feet from my residence. I feel this would bring several negative impacts to my land, my health, and my peace.	Final routing of the line on private property will have to comply with County permitting regulations; BLM has no authority to permit projects on private land. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100805	JOHN DEROOS		There are dangers with this transmission line which far outweigh the benefits it would bring to Idaho. There are other options to reun this line, if it even must be run at all. If this project needs to go forward, for the love of all thats good and right please place this project on public land. It makes sense. Public power on public land.	The reasons for selecting the Preferred Route in Idaho are found in Section 2.4.1.1 of the FEIS.
100806	GORDON SMITH		At the Gateway West open house in Montpelier Idaho, I talked with Pam Anderson, PMP Project Manager Transmission Delivery, about road access when installation of the Transmission Line begins. We looked at the map on TS 125 R435 Section 07 with the access road in the Northeast quadrant west of Stauffer Canyon Road. This road was the major access road for BLM and Bear Lake County Fire trucks during the North Canyon fire in 2012 and would be beneficial in the installation of the Transmission Lines. This route follows the Stauffer Canyon Road north then "T's" left for about mile then at the "T" go left up Aspen Drive then in about two miles take a right up to the ridge line road where this section of Transmission Line work will take place.	The BLM has no authority over siting on private land. Siting details on private lands in Idaho are a matter between the Proponents, the landowner, and the county.

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100807	JOHN BRENTON		I have recently found out that you are planning to place this line through the property that I happen to live on for the past 20+ years. There is BLM land just south of here (about 1 Mile) that I feel should be used for this purpose. As this is land that has use restrictions on it as far as public use I see no reasons that this can not be used for this line. Placing it on the property that I live on place the inconvenience upon me . I have poor cell phone service as it is here and use broadband for the computer!! Both of which your line would cause interference with. Find a use for that worthless BLM land to the south of the R/R tracks	Your comment about where the line should be sited is noted. The analysis in Section 3.21 shows the distance from the lines where interference is expected. The electric field from a 500-kV transmission line drops to near zero within a hundred feet of the ROW (see Figure 3.21-4 of the FEIS).
100808	TOM BARNES		I have been following this project for some time and happy to see our power distribution lines catching up with future demands.	Noted.
100808	TOM BARNES		Obviously there will be miles of dirt roads. What is the plan for dust control that seems to be a huge environmental issue? Reason for the question I am associated with a company that makes a product additive to concrete powder which greatly assists in the binding benefits when tilled into the dirt or road base material. Is there a contact you may forward to me that I may meet to introduce the product. This product could have great benefits for the miles of roads associated with this project as well as other BLM, USFS and Land Use projects. This is a product from Germany with great results over the past 20 years and not yet in the U.S. market.	Refer to Section 3.20.2.2 for a discussion on controlling dust. AIR-5 states: " Dust suppression techniques will be applied, such as watering construction areas or removing dirt tracked onto a paved road as necessary to prevent safety hazards or nuisances on access roads and in construction zones near residential and commercial areas and along major highways and interstates." Also see Appendix N to the Revised Plan of Development (attached to the ROD) for additional details. The Proponents will be responsible for applying dust control materials; the applicable land management agency will need to approve of any chemicals used.
100811	JAMES AND MARY FREELAND		Reference to segment 8, 8d on map This rout should not cross the melba valley. It would be disruptive to an important agriculture area. The impact on our towns, farms, homes and health is to great. Our valley is small and these huge towers could ruin the valley.	Your opposition to this route is noted. Refer to Section 2.4.1.1 of the FEIS for the reasons the Preferred Route for Segment 8 was selected. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100811	JAMES AND MARY FREELAND		There is plenty of room to run the lines through the NCA south of Kuna, crossing the snake river and through Public land to the Hemingway Substation.	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared.
100811	JAMES AND MARY FREELAND		If you have to cross farm or ranch land do it where it is the least effect on the residences.	The BLM has no authority over siting on private land. Siting details are a matter between the Proponents, the landowner, and the county; however, the BLM expects that the Proponents will work with the landowner to reduce impacts where practicable.
100812	TERRY GOICOECHEA JENSEN		I live in Owyhee County, Idaho. I endorse segment 9D as the only route this project should take since there is already an existing line there and a road that was paid for by the tax payers. All other routes cross private property and very sensitive geological areas (Lake Idaho) and wild habitat (sage grouse).	The Alternative 9D route crosses the same amount of private property as 9E (3.3 miles). The BLM concluded that the ground disturbance and new access roads associated with 9D would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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100812	TERRY GOICOECHEA JENSEN		It would be ashame to tear all this up when there is the already a viable route. Once accessed by new roads and the structures needed for this project we will have lost valuable historical ground that can't be reclaimed. As well the routes proposed other then thru the "birds of prey" area is at an added cost to the project in itself.	The BLM concluded that the ground disturbance and new access roads associated with 9D would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared.
100812	TERRY GOICOECHEA JENSEN		I also support the "a phased decision" to allow the citizens of Owyhee county a voice in the routing of this project.	Your support for a phased decision is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100813	DONALD R AND SHARI L ROBERTS		I support the BLM agency's preferred segment 8 alternative route bypassing the Birds of Prey (BOP) area and headed through Kuna.	Your support of Alternative 8B of the BLM's Preferred Alternative to Segment 8 is noted.
100813	DONALD R AND SHARI L ROBERTS		My fear with the other proposed routes going through the BOP area is the severe disruption to the sage-grouse critical habitat and the destruction of the remaining Slickspot Peppergrass colonies. Once these physical Peppergrass locations are destroyed, the Peppergrass can never come back. To quote the USFWS Listing Lepidium papilliferum (Slickspot Peppergrass) as a threatened species throughout its range; Final rule. Federal Register October 8, 2009: "Slick spots take a long time to form; those existing now were likely formed during the Pleistocene, and then altered early in the Holocene when salt deposits were layered over them by wind. It is thought that slick spots are no longer being formed in today's climate, so when they are destroyed they are permanently lost." It's sad to think that after 12 thousand years of perilous desert survival, a Peppergrass location was snuffed out by a helicopter's beating blade backwash, or a tower crew standing around eating lunch and stomping out a cigarette. Or, all the prolonged construction commotion scared the sage-grouse into moving away and many were dispersed or killed as a result of the "Law of Unintended Consequences." I fear with the tower construction, the helicopters, and the supporting crews advancing through the BOP like an army; along with the public drawn to the construction spectacle as if it were a fire or car accident, they will inadvertently run over and obliterate Slickspot Peppergrass colonies without even knowing what just happened. Sad to think that where Congress set aside the BOP for the public enjoyment and set laws in motion to prevent destruction of rare and irreplaceable plants and animals that it could happen again right under their noses in the interest of a utility saving money. If you're a believer in "Murphy's Law", you must assume that the sage-grouse and Slickspot Peppergrass habitats will suffer more harm than currently anticipated.	The Preferred Route for 8 and 9 avoids PPH for sage-grouse and occupied slickspot peppergrass habitat to the extent practicable. Refer to Section 3.7.2.3 of the FEIS for effects on special status plants and Section 3.11.2 for effects on sage-grouse. The FEIS includes seasonal restrictions on construction and maintenance to limit effects on sage-grouse and other species.
100813	DONALD R AND SHARI L ROBERTS		My fear with the other proposed routes going through the BOP area is the severe disruption to the sage-grouse critical habitat and the destruction of the remaining Slickspot Peppergrass colonies. It's sad to think that after 12 thousand years of perilous desert survival, a Peppergrass location was snuffed out by a helicopter's beating blade	See the avoidance, minimization, and mitigation measures in Table 2.7-1 in Chapter 2 of the FEIS, as well as Section 3.7.

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			backwash, or a tower crew standing around eating lunch and stomping out a cigarette. Or, all the prolonged construction commotion scared the sage-grouse into moving away and many were dispersed or killed as a result of the “Law of Unintended Consequences.”	
100813	DONALD R AND SHARI L ROBERTS		I support the BLM agency’s preferred alternative route bypassing the Birds of Prey (BOP) area and headed through Kuna. Failing that decision, I support actually going through the ANG training grounds just a bit SOUTH of the current 500 KVA lines. No doubt the military claims their tank operations will be disrupted, but as a land owner holding hundreds of acres within the BOP National Conservation Area that also borders the ANG training area in section #8 at Pleasant Valley rd, I’m able to observe this location daily and they DO NOT use this East-West strip because the terrain is too rocky and is often inhabited by the public for rifle shooting. While they might claim it’s in the training mission / defense interest, it’s really nothing more than a bit of turf-protection strategy. Most of this southern strip area over by the Pleasant Valley rd. area is already heavily damaged by the public with dumping & shooting, free-range cattle watering sites, and no new flora/fauna harm can possibly be done to it.	Your support of the BLM's Preferred Alternative for Segment 9 is noted. Building the transmission line through the military training area is not an option.
100813	DONALD R AND SHARI L ROBERTS		Finally, if it’s decided that the new line should advance through the BOP, what measures will be taken to mitigate dust and noise generated by construction project vehicles advancing daily through Pleasant Valley rd? There must be some environmental impact to Bald eagles, assorted raptors, and to human families living on and/or the public using the BOP for recreation. Remember, the BOP is a National Conservation Area, not a Convenient Bypass Area.	Measures to control dust are summarized in Table 2.7-1 and discussed in more detail in Section 3.20. The effects of noise and other disturbances associated with the lines on wildlife are discussed in Section 3.10. Nesting birds could be adversely affected. The FEIS includes seasonal restrictions to protect nesting birds.
100814	KATIE FITE	WESTERN WATERSHEDS	On no part of the route is visual intrusion adequately analyzed or mitigated.	The EIS goes into great detail in analyzing project effects on visual resources. Refer to Sections 3.2 and 3.3, as well as Appendix G. Additional photo simulations are located in Appendix E.
100814	KATIE FITE	WESTERN WATERSHEDS	Bundling any Gateway line into existing utility corridor swaths and Idaho Power working collaboratively with other transmission line entities to use/energize their lines or corridors must be included in a SEIS.	The need for the Project is discussed in Chapter 1. The reasons that new lines are not “bundled” into existing lines is explained in Section 1.3.
100814	KATIE FITE	WESTERN WATERSHEDS	Landscape-level and Project Footprint baseline information highlighting areas of ecological importance in 2013 has also still not been provided. BLM has internal maps that overlay sage-grouse, pygmy rabbit and other habitats and conflicts. This all should have been made public and laid out in the Scoping and now the DEIS process – so that a valid range of alternatives and analysis can occur. Interior refuses to lay out basic information necessary to properly plan to protect and conserve wild public lands, and imperiled species, and so be able to tell industry: No – don’t even consider a route in that intact area. Please develop a range of alternatives using disturbed lands instead.	Refer to Appendix E of the FEIS for habitat and species maps. GIS habitat maps for additional species are part of the project record and were available upon request to the public. The scope of the project (over 3,000 miles of alternative routes analyzed) precludes including all possible information in the EIS. Although detailed baseline data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.

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100814	KATIE FITE	WESTERN WATERSHEDS	A full analysis of the catastrophic fire and agency treatment habitat losses that have occurred in much of Idaho and Wyoming and portions of Nevada has not been provided. This includes fire, exotic seedings, cheatgrass invasion, high density of livestock fences and facilities, high road densities, etc. We Protest this.	The level of detail requested is beyond the level needed to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. The HEA does include information on these items at a landscape scale.
100814	KATIE FITE	WESTERN WATERSHEDS	Revised and expanded analysis of the adverse impacts of potential linked or foreseeable development of new energy or other projects (wind, geothermal, fossil fuel, more transmission, etc.) in the path of any potential route of the Gateway line have not been fully examined.	Cumulative impacts from foreseeable energy development are included in Chapter 4.
100814	KATIE FITE	WESTERN WATERSHEDS	In scoping, we asked that BLM fully explain why this line, along with all the other existing proposed and foreseeable corridors are needed.	As stated in Section 1.2, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM relies on DOE and FERC to evaluate the Proponents' objectives.
100814	KATIE FITE	WESTERN WATERSHEDS	All of the other potential large transmission projects (and the disastrous alternatives) would result in a proliferation of roading and other human disturbances, and cut-across roads at points from existing roads.	If all of the proposed transmission lines were built, many additional roads would be needed; conversely, many of the roads built or improved for this Project would likely be used for other lines. The effects of additional roads are considered in the EIS, as well as in the HEA (see Appendix J).
100814	KATIE FITE	WESTERN WATERSHEDS	No map of access roads, project construction disturbance areas, etc. is provided so that informed comparisons of impacts can be made and NEPA's require "hard look" at alternatives taken.	The NEPA process requires enough information to provide decision makers with sufficient information to determine relative impacts between alternatives and the general degree of impact to affected resources. The NEPA process is not designed to provide extensive detailed information at all scales for all resources.
100814	KATIE FITE	WESTERN WATERSHEDS	The impacts of Gateway (and any other foreseeable projects and renewable or other energy facilities these lines may spawn) on all sensitive species populations must be analyzed.	Cumulative impacts from foreseeable energy development are included in Chapter 4. Direct and indirect impacts are assessed in Chapter 3.
100814	KATIE FITE	WESTERN WATERSHEDS	We are very concerned about migratory bird and bat collisions with transmission lines, and the migration routes and patterns (including areas where birds may be flying low under adverse weather conditions) must be fully examined. Migration routes in the region traversed by Gateway are very poorly understood. When renewable energy project analyses (such as the greatly flawed China Mountain EIS) have been prepared, BLM has not required that industry consultants conduct necessary multi-year intensive radar and other studies necessary to understand the large-scale conflicts with migrating passerines, raptors, or bats, including during inclement weather when migrating birds may be downed. The Gateway line could open up vast areas just east of Salmon Falls Reservoir to deadly industrial wind development and even	Effects on migratory birds are assessed in Section 3.10. Additional information on special status birds is included in Section 3.11. The EIS acknowledges that bird and bat collisions may occur. Additional mitigation for impacts to migratory birds is included with the ROD.

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			more powerline sprawl. Full analysis of migration routes must be provided for this as well as all other potential routes or segments.	
100814	KATIE FITE	WESTERN WATERSHEDS	Radar data on migrants must be collected for many portions of the route, specially in all areas of the South Hills and other likely areas. We strongly Protest that this has not been done. A SEIS is essential to answer these questions alone.	The EIS acknowledges that bird collisions may occur. Additional mitigation for impacts to migratory birds is included with the ROD. Collecting radar data is well beyond the scope of this project-level analysis and is not needed for a reasoned decision on the project. The NEPA process requires enough information to provide decision makers with enough information to determine relative impacts between alternatives and the general degree of impact to affected resources. The process is not designed to provide extensive detailed information at all scales for all resources.
100814	KATIE FITE	WESTERN WATERSHEDS	This EIS must provide detailed (and honest) analysis of the catastrophic effects that the ill-sited wind developments that may be facilitated by Gateway would have on sage-grouse and many other wildlife populations as well as migratory bird populations shared between states so that the cumulative effects of this project can be understood.	Catastrophic events associated with other projects that may or may not occur cannot be reasonably evaluated beyond the level considered in Chapter 4. NEPA does not require detailed analysis of every possible calamity that could occur. Fires, including catastrophic fires, have occurred and will likely occur in the future. The general effects of large fires on wildlife habitats are known and are considered in the analysis. The extent and exact locations of future catastrophic fires are not knowable,
100814	KATIE FITE	WESTERN WATERSHEDS	This is necessary to understand the impacts of the route in Wyoming, and eastern Idaho, and potential route near the Nevada border and parts of the South Hills. The combined effects of wind or other development and abusive livestock grazing practices countenanced by BLM will very foreseeably cause even further reductions in sage-grouse and other wildlife populations leading to extirpation of the birds in many areas. If BLM authorized the potential southern route by the Nevada border east of Salmon Falls and then up into Shoshone Basin, the disturbance, increased nest predation, increased predation of adult birds, and increased human disturbance including fires resulting from Gateway plowing through remote undeveloped lands, coupled with the foreseeable wind energy and other development sprawl that would be spawned. This all combined is highly likely to cause great declines or loss altogether of the sage-grouse populations in the Idaho-Nevada borderlands east of Salmon Falls. Where else are such combined effects likely – in Wyoming, Utah, or Idaho?	The BLM Preferred Route does not include any routes in or through Nevada or the Shoshone Basin. Alternative 7K, which crosses a large portion of the South Hills IBA, is not part of the BLM's Preferred Alternative. Effects on birds in the South Hills are disclosed in Section 3.10.2.2.
100814	KATIE FITE	WESTERN WATERSHEDS	The full battery of private land wind developments all along the route must be fully examined. The Sawtooth Forest southern division has issued a series of Categorical Exclusions for wind MET towers in various sites north of the Nevada route. Plus Gollaher Mountain and other Nevada areas have also been put forth as wind development sites. Have there been rights-of-way for various energy activities issued in Wyoming, or the Project Footprint in Utah, as well? There is large-scale industrial wind in lands in eastern Idaho, and the American Falls/Rockland area. China Mountain (tabled for now) or similar projects and Gateway and the development/energy sprawl spawned	The Preferred Route for the Gateway West transmission line avoids the Sawtooth NF as well as preliminary priority habitat for sage-grouse crossed by Alternative 7K. Cumulative effects from existing power generating sources are discussed in Section 4.1 and effects from foreseeable generating developments, including proposed transmission facilities, are discussed in Section 4.2 of the EIS. The cumulative effects of these projects on listed species are also discussed in the Biological Assessment (Appendix M of the FEIS). Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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			could result in a significant range perforation for sage-grouse, and significant declines in pygmy rabbit and other wildlife as well. We are very concerned with potential wind energy development in Wyoming in areas with sage-grouse populations, prairie dogs and even black-tailed ferret. It appears substation locations in some areas (like Wyoming) may be anticipating wind development, yet the full indirect and cumulative effects of all of this existing and potential development all along the path of Gateway and its alternatives have not been addressed. We Protest the failure to adequately analyze the potential cumulative effects of Gateway spawning more run amok wind development, as well as the cumulative effects of this foreseeable development on sage-grouse, sharptail grouse, pygmy rabbit and other sensitive, rare, T&E species habitats and populations.	
100814	KATIE FITE	WESTERN WATERSHEDS	With transmission lines such as this, wild land fire danger is greatly increased – including from increased flammable weeds that proliferate in areas of disturbance, from increased vehicle/OHV use, from raptor electrocutions igniting wild land fires, etc. We note BLM often fails in controlling OHV use. Many LUPs are woefully outdated and crosscountry use and road proliferation is allowed. Fires from Raptor electrocutions have ignited grasses as electrocuted birds fall to earth in southern Idaho. All of these risks must be considered in siting decisions, and they have not been.	Weed control measures are discussed in Section 3.8 of the FEIS. Raptor electrocutions are not associated with 500 kV lines. Conductors are 19.5 feet apart, and none of the birds that use this area have wingspans approaching this distance.
100814	KATIE FITE	WESTERN WATERSHEDS	Any LUP amendments must include road/OHV closures in any new or upgraded roading caused by this project.	Your comment is noted; see Appendix F for a discussion of proposed amendments.
100814	KATIE FITE	WESTERN WATERSHEDS	Gateway splits and often minimizes protective actions for natural resources on private lands.	The BLM does not permit or prohibit developments on non-federal lands. It has no authority to require any protective actions on private lands.
100814	KATIE FITE	WESTERN WATERSHEDS	Several of the various huge transmission/corridor processes are inter-related, and the full picture of energy alternatives that site any power generating/transmission facilities much closer to urban areas, that focus on private land development of “renewables”, and that focus on decentralized energy and home or other solar/wind generation and conservation must be fully explored. This should be contrasted with the current apparent free-for-all Corridor Grab that appears to be unfolding across the Western Landscape, of which this Gateway EIS process is a part. Part of the Energy sprawl that appears to be occurring is aimed at keeping a chokehold on centralized large-grid projects like this one. These large projects make it easier for very large power industry players or speculators to manipulate and control and raise prices on power – as occurred with the Enron scandal.	Refer to Figure E.24-1 for a display of other proposed and existing large transmission lines. Refer to Chapter 4 for analysis. Contrasting these projects with alternative energy development in or near urban areas is well beyond the scope of this analysis. Refer to Chapter 1 for the Purpose and Need for the Project and the reasons for separation of lines.
100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the failure to analyze and reveal any potential subsidies and burden on taxpayers with Gateway. We are also very concerned about even further costs to the public ratepayers that will result to subsidize this line for Idaho Power’s speculative benefit.	Your protest is noted. Refer to the BLM’s response to the protests filed on this project (Appendix K to the ROD).

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100814	KATIE FITE	WESTERN WATERSHEDS	From the start, we have commented that BLM must fully and clearly evaluate whether there really is a need for the plethora of projects and corridor paths being proposed across this region, and must explain why Gateway, even if needed, cannot just follow or hook into other areas, rather than destroying undeveloped areas.	Chapter 1 discusses the Purpose and Need for the Project.
100814	KATIE FITE	WESTERN WATERSHEDS	A SEIS must provide honest, detailed information and independent analysis of why Idaho Power cannot focus on conservation measures with its customers and develop a really good smart grid as well as encouraging rather than trying to kill rooftop solar, instead of wasting power and resources through long-distance transmission, and destroying or highly degrading so many areas of public lands, along with placing another lethal hazard to birds and bats across so vast a landscape.	Providing an" independent analysis of why Idaho Power cannot focus on conservation measures with its customers and develop a really good smart grid as well as encouraging rather than trying to kill rooftop solar" is beyond the scope of this analysis. Refer to Chapter 1 for the Purpose and Need for the Project.
100814	KATIE FITE	WESTERN WATERSHEDS	How much energy will be required to build this line? Please provide all information –from likely import of steel to mining raw materials, to herbiciding weeds spawned anywhere across the globe. Please also analyze how much power will be lost in transmission,	Although detailed data are not available for all areas for all of these issues, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed. According to the American Electric Power transmission factsheet, approximately 1.3 percent of the electricity is lost per 100 miles of a 500-kV line. Therefore, the amount of power that would be “lost” in transporting electricity on the proposed and alternative routes is associated with the length of each route. However, there are many other factors to consider in choosing as route alternative,
100814	KATIE FITE	WESTERN WATERSHEDS	BLM must consider saying No to Gateway and other projects that would have such deleterious effects, especially if the extremely harmful wild land routes are chosen.	The EIS evaluates a No Action Alternative.
100814	KATIE FITE	WESTERN WATERSHEDS	BLM has set up no rational framework to deny portions of the route – and instead appears to be embracing a highly flawed and minimal mitigation scheme that the power company has concocted.	As noted in Chapter 1, the BLM may decide to approve all or part of the project. This decision is based on the analysis included in the EIS.
100814	KATIE FITE	WESTERN WATERSHEDS	BLM must require that a range of viable alternatives be considered and not a series of non-mitigatable southern routes, along with analysis of much stronger conservation measures, and alternatives that fully follow existing large transmission routes and/or the Interstate.	The EIS includes an appropriate range of alternatives; refer to Section 2.4 of the FEIS. Mitigation is included in the decision.
100814	KATIE FITE	WESTERN WATERSHEDS	A SEIS must incorporate the full range of ecological concerns (such as habitat loss and fragmentation for native biota that will result from all potential segments), and the tremendous ecological footprint of a host of likely linked developments – ranging from powerlines to road networks that these projects would spawn) to potential wind, geothermal and solar development sprawl.	The EIS disclosed effects due to habitat loss and fragmentation and from developments, including powerlines to road networks.

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100814	KATIE FITE	WESTERN WATERSHEDS	Please also consider the potential for Gateway to promote oil and gas development, mining, and other industrial undertakings that further promote habitat loss.	Reasonably foreseeable actions are addressed in Chapter 4 of the FEIS; Cumulative Effects. It is not in the scope of this project-level EIS to address all environmental impacts from possible future actions that may utilize the transmission capacity of the line.
100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the failure to fully analyze this linked development and sprawl. Please analyze the potential for development. We surmise that the map would be black with leases/claims/rights of way.	The CEQ regulation Sec. 1508.25 states the following: “....Actions are connected if they: Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification.” As discussed in Chapter 1, the Gateway West Project is needed to upgrade the capacity and reliability of the existing grid. We considered reasonably foreseeable energy development projects (see Section 4.2.2.5) but did not identify any new power development projects that are dependent on the Gateway West Transmission Line Project or that the Gateway West Project is dependent upon. While it is logical to assume that a wind or solar project would trigger construction of a new transmission line to connect it with the grid, it does not follow that the Gateway West Project will trigger any specific new wind or solar project. Gateway West is one of several new transmission lines being planned, any of which could transport new coal, wind, or solar energy. Power is likely to come from a many sources, both existing and new, but the Project is not dependent on any specific new sources. Therefore, new power generation is considered a cumulative effect, not a connected action. Section 4.2.2.5 discusses proposed new energy facilities and discloses the possible cumulative effects. Potential future development, e.g., development that may someday occur because of the expanded electric grid, is not a connected action, under the NEPA process. Connected actions are actions that would only occur if the Gateway Project is built. The cumulative effects section takes into account reasonably foreseeable projects but does not consider speculative development that may result from this or other transmission line improvements, or from local energy production and or conservation.
100814	KATIE FITE	WESTERN WATERSHEDS	How will siting of “renewable” energy complexes potentially linked to this line alter localized weather and other patterns? We understand that vast areas of arid lands will be bladed/bulldozed – cleared of vegetation, paved and solar panels placed if solar energy is developed. This will certainly alter local winds, local temperatures, and have other effects. There has been discussion of some solar facilities being sited in Idaho. As our China Mountain comments (submitted with comments on the DEIS) show, remote wild land wind farms have a massive roading	Analyzing possible but speculative impacts from “vast areas of arid lands will be bladed/bulldozed – cleared of vegetation, paved and solar panels placed if solar energy is developed” is beyond the scope of this analysis. The EIS includes sufficient data to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on the impacts that the various project alternatives would have on resources. As discussed above, the amount of power that would

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			<p>impact, will interfere with windblown snow accumulation and the ability of the site to support moisture-dependent vegetation communities as well as hydrological processes, and have an overall terribly harmful Footprint. The Gateway road network may also alter snow deposition and hydrological processes. We Protest the failure to analyze a bevy of linked development sprawl concerns. How much power will be lost in the remote lands siting of energy projects that may tie into this line, vs. siting closer to metro areas and/or emphasis on local and more self-sufficient generation of solar and other power? How might local or self-sufficient generation of power alleviate or reduce rolling black-outs, and other effects of an overloaded centralized grid?</p> <p>We Protest the failure to examine the Gateway project in the context of energy loss from the grid. Why was the DOE Corridor process even conducted - if additional mushrooming corridors like Gateway, in relative proximity, can be obtained at any time?</p>	<p>be “lost” in transporting electricity on the proposed and alternative routes is associated with the length of the route. However, there are many other factors to consider, including effects on wildlife and their habitat, historic and prehistoric resources, people and their residences, to name a few. The DOE Corridor process was conducted because it was required by law. The law did not require all future projects to be sited in a corridor.</p>
100814	KATIE FITE	WESTERN WATERSHEDS	<p>If distance separation is needed between various energy projects – what is a minimal and reasonable separation? We Protest the failure to adequately address these concerns.</p>	<p>This is addressed in Section 1.3 of the FEIS.</p>
100814	KATIE FITE	WESTERN WATERSHEDS	<p>The EIS process failed to consider an adequate range of alternatives, including those focused on locally generated and locally used power – instead of transport (and much associated loss of electrical power) across long-distances ripping apart critical big game winter ranges, sage grouse habitats, pygmy rabbit habitats, loggerhead shrike habitats, cultural and historical sites including unique trails and viewsheds, landscapes and ecosystems critical to the integrity of National Parks and Monuments, ACEC, WSAs and Wilderness Areas, etc. In the BLM sage-grouse EIS process, new ACECs may be designated to protect sage-grouse and sagebrush ecosystems– yet Gateway may rip across these potential ACECs.</p>	<p>The EIS includes an appropriate range of alternatives; refer to Section 2.4 of the FEIS. Analyzing the costs, benefits, and impacts of the full range of possible local energy production facilities would be well beyond the scope of this EIS. See Chapter 1 for the Purpose and Need for the Project.</p>
100814	KATIE FITE	WESTERN WATERSHEDS	<p>What ACECs have been proposed, and are under consideration in that process, and how might Gateway prejudice the outcome of that EIS? We Protest the failure to fully examine the line’s full adverse impacts, and candidly address how Gateway fails to conserve, enhance and restore sage-grouse and sagebrush landscapes.</p>	<p>Proposing ACECs is beyond the scope of this EIS.</p>
100814	KATIE FITE	WESTERN WATERSHEDS	<p>Adverse impacts to residents and wildlife and potential health hazards include harmful effects of lines and transformer sites, as well as herbicide use along huge disturbed corridors and the disturbance associated with the development that will be spawned, toxic materials associated with energy facilities, pollutants associated with linked/facilitated coal plants and other development, spills or leakage of all manner of nasty chemicals ranging from PCBs to chemical solvents, ground and surface water contamination from materials/substances transported, used or spilled/leaked, or that may contaminate water used or “run-through” or re-injected in association with geothermal or other development that will be spawned. There will also be cumulative</p>	<p>Public safety is discussed in Section 3.22, and the electrical environment in Section 3.21. The EIS includes EPMs to reduce the spread of weeds (such as requiring weed-free straw and gravel) and other EPMs to control the use of herbicide. See Table 2.7-1 in the FEIS.</p>

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			impacts of herbicides and chemicals used with roadways in areas where the Gateway, road rights-of-ways, and public lands grazing disturbance overlap. There is a great dearth of information on the full amount of herbicide use and drift that may result – both during construction as well as over the life of the project. We Protest this.	
100814	KATIE FITE	WESTERN WATERSHEDS	Grazing: We Protest the appalling lack of candid information and analysis of the direct, indirect and cumulative impacts of livestock grazing on the current ecological health of all public lands grazing allotments in and near all potential segments.	The adverse impacts due to grazing are discussed in Sections 3.10 and 3.11. Conducting a detailed analysis of grazing across a thousand miles of rangeland is beyond the scope of this EIS. The BLM is currently conducting an analysis of grazing levels on 16 planning units in six western states under a 2011 court decision. Grazing is further discussed in Sections 3.17 and 3.18 of the FEIS. Cumulative impacts of grazing on various resources are discussed in Chapter 4, in multiple resource subsections of Section 4.4.
100814	KATIE FITE	WESTERN WATERSHEDS	A Supplemental EIS is required to fully address the effects on public lands of the Gateway disturbance on top of the adverse effects of habitat degradation, loss and fragmentation caused by livestock grazing, livestock facilities, and often linked wildfire, roading, agency forage and vegetation “treatments” and other disturbances.	The FEIS includes sufficient data for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	How will it be possible to rehab disturbed lands (soils, microbiotic crusts, native vegetation communities, fragile sagebrush sites) faced with continued chronic grazing disturbance? What is the risk of failure, and permanent domination by invasive annual grasses and other weeds?	Analyzing the long-term effects of grazing is beyond the scope of this analysis. Note that the BLM is currently re-evaluating grazing levels on 16 planning units in six western states.
100814	KATIE FITE	WESTERN WATERSHEDS	Current science on the very long disturbance interval of many arid sagebrush and other communities must be provided.	The FEIS includes sufficient data for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	There is no baseline information provided on the existing battery of livestock facilities that serve to degrade or fragment essential species habitat components across the Corridor and landscape impacts. This includes livestock fences, water developments (spring “development” and de-watering projects, water pipelines and troughs, wells), salting sites, etc.	Baseline information "on the existing battery of livestock facilities" beyond the information on facilities that could be directly or indirectly affected by the project is not needed for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	How will the added degree of habitat fragmentation by Gateway heighten and increase these impacts?	The adverse impacts due to habitat fragmentation are discussed in Sections 3.10 and 3.11. Cumulative impacts of habitat fragmentation on various resources are discussed in Chapter 4, in multiple resource subsections of Section 4.4.
100814	KATIE FITE	WESTERN WATERSHEDS	As mitigation please require that project proponents set aside significant sums for purchase of private lands with important biological values, as well as for purchase of public lands grazing permits and permanent permit retirement for the specific region where the corridor or linked new development is located.	The proposed mitigation plan includes funds for conservation easements on private land, as well as a fund to manage the program. Purchasing grazing rights is not included.

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100814	KATIE FITE	WESTERN WATERSHEDS	There is not adequate mitigation or required mandatory actions associated with this EIS to adequately address the deleterious effects of this powerline, transformer stations, expanded roading, and all disturbances associated with construction, operation and de-commissioning.	Additional mitigation has been developed following public comments on the FEIS; refer to the mitigation plans included with the ROD, in addition to the information in Appendices C and J to the FEIS.
100814	KATIE FITE	WESTERN WATERSHEDS	How much will the risk of wild land fires (and thus significant losses of habitat) increase with Gateway development?	Fire risk is discussed in Section 3.22 of the FEIS; fire effects on wildlife are discussed in Sections 3.10 and 3.11.
100814	KATIE FITE	WESTERN WATERSHEDS	There is not even a baseline map provided of fire history.	The HEA includes baseline data on fire. Providing a map of all fires that have occurred in the past across a thousand miles of Idaho and Wyoming, even if one could be created, is not needed to understand how wildlife habitat has been affected by wildfire and other habitat changes.
100814	KATIE FITE	WESTERN WATERSHEDS	What is the current Footprint of fencing and other livestock infrastructure in the affected landscape?	The HEA considered information on fences where available. Creating a map with the "current Footprint of fencing and other livestock infrastructure" is beyond the scope of this project. The FEIS includes sufficient data for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	Where are all critical or seasonal ranges located in the landscape impacted?	Appendix I lists the seasonal restriction periods for wildlife and the areas to which they apply. Also see the analysis in Sections 3.10 and 3.11.
100814	KATIE FITE	WESTERN WATERSHEDS	Where are all known migration corridors or movement pathways? Please conduct necessary baseline studies to determine migratory bird routes, especially in areas where such routes may be less known. What percentage of the population of each species may use each route? How might this corridor and also the development that may be spawned such as industrial wind farms on remote ranges affect population viability? We are very concerned at the failure of the EIS to conduct necessary analysis to understand migration patterns in this little-studied landscape.	Although detailed baseline data are not included for all areas for all migration routes, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	All of this must be determined in a comprehensive Supplemental EIS analysis.	A supplemental EIS is not required. Although detailed baseline data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	The consequences of any Amendment cannot be understood unless current and comprehensive wildlife information is provided, and all other parts of the Land Use Plan are complied with.	The EIS provides a detailed, comprehensive analysis of wildlife habitats and project effects. The analysis includes an HEA for direct effects. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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100814	KATIE FITE	WESTERN WATERSHEDS	What protections for wildlife are found in the Plans? How does Gateway conflict with those? Why isn't BLM strengthening protections to mitigate the adverse impacts of this immense project?	The planning record includes a consistency table for all management plans. These were prepared early in the project. Additional consistency tables were prepared for revised RMPs completed during the project. These tables were used to identify project-related actions not in conformance with management plans. Appendix F includes the plan amendments and the rationale for including them.
100814	KATIE FITE	WESTERN WATERSHEDS	Please provide a full and detailed analysis of how any rehab of disturbed areas would occur, including how any rehabbed areas would be protected from grazing. No new fencing must be built. Entire pastures must be closed. Otherwise more fencing would need to be built. Will native species only be used in any site rehab? We are greatly concerned about the use of any exotic species – which spread.	Rehabilitation plans are included in the POD, which is attached to the ROD. As noted in many places in the EIS, species appropriate to each specific area and approved by the land managers will be required, e.g., WEED-1 "The Proponents shall consult with each appropriate local land management agency (Forest Service and BLM) office to determine appropriate seed mix and commercial seed source for revegetation. The Reclamation, Revegetation, and Weed Management Plan shall specify the approved seed mixes for federal lands..."; and VEG-4: "The Proponents will consult with the appropriate land management agency to determine tree seedlings to be planted in decommissioned roadbeds and other temporarily disturbed areas on federally managed lands (where trees were removed) to assure seedlings are matched to site conditions."
100814	KATIE FITE	WESTERN WATERSHEDS	How will global warming impede rehab of disturbance zones? Only local native ecotypes should be used in rehab efforts. A minimum of 5 to 10 years rest, and specific recover criteria including recovery of microbiotic crusts and the native shrub component must be required.	The EIS includes measures to reduce ground disturbance and to restore disturbed areas. Rework is required if monitoring indicates that the original efforts are not satisfactory. Regardless of any long-term warming trend, the Proponents will be required to rehabilitate the disturbed areas. It may take longer and be more costly but it is still required.
100814	KATIE FITE	WESTERN WATERSHEDS	There is no detailed analysis of the adverse effects on health and safety of motorists on federal, state, and local highways in the project potential route Footprints.	Other than possible collisions with construction equipment (refer to Section 3.19 -Transportation and to the transportation management plan in the POD) no adverse effects can reasonably be expected for people driving under or near the transmission lines. Thousands of miles of existing roads cross or are adjacent to 500 kV lines, and no adverse effects were identified.
100814	KATIE FITE	WESTERN WATERSHEDS	What exposure will passing motorists have to herbicides used to control weeds thriving in corridor disturbance zones? Please note that the BLM Weed EIS (Vegetation Treatment EIS) is considered by many to be greatly inadequate in addressing ecological and human and wildlife health concerns related to the use of a great number of herbicides across public lands. Various Forests have only old, outdated, or minimal to non-existent analysis of herbicides currently in use and their adverse effects to wildlife and humans.	Effects, if any, will be similar to those currently occurring along thousands of miles of roadways treated with approved herbicides.
100814	KATIE FITE	WESTERN WATERSHEDS	There is no adequate discussion or analysis of the current ecological health or importance of all the lands that will be affected. This is important to understand the difficulty of any rehabbing and the likelihood of invasive species dominance, and altered fire cycles caused	Sections 3.6 and 3.7 discuss vegetation in the analysis area. Sections 3.10 and 3.11 discuss these areas in terms of wildlife habitats. If by southern routes the comments refers to 7H, 7I, 7J, and 7K, there are not included in the Preferred Alternative.

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			by Gateway development. It is necessary to understand the relative scarcity/tremendous ecological importance – of lands that will be impaired as Gateway tears apart the remaining less developed landscapes and habitat areas in shrubsteppe, salt desert shrub and other arid habitats especially under the very harmful southern routes in Idaho. Landscapes will be further fragmented and torn apart once the Corridor infrastructure is in place.	Although detailed data are not available for all areas for all habitat components, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	BLM has not conducted a full-scale analysis of the effects of this development on short term, mid term, and long-term viability of all BLM sensitive species populations and all TES species, and the significance of the habitat areas and populations to the species as a whole (see Wisdom et al. 2002, Connelly et al. 2004, Knick and Connelly 2009/2011 as a starting point for this analysis).	Effects on BLM sensitive species are discussed in Section 3.11 of the FEIS. Although detailed baseline data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	There has been a large amount of discussion and promotion of wind energy development on remote public lands in areas in and near the SWIP swaths. Ely and Elko BLM know this – why have you not included that here? The windy ridges and plateaus (both in the area colored purple on your map as well as across of the Nevada landscape that you have omitted) lands are critical to maintaining viable populations of sage grouse and pygmy rabbit. They are also critical migration corridors for migratory birds, and placement of hazardous powerlines, wind facilities, likely lighting that may lure some species during migration, etc. would have international significance – as these serve as migration corridors for raptor, migratory songbird and perhaps bat movement north to Canada and south to Mexico. The bottom line is that the EIS appears to have purposefully downplayed the linked and foreseeable industrial wind farm development areas to cover up the tremendous ecological footprint that these corridors would have.	Refer to Chapter 4 for the criteria we used to identify "foreseeable projects". Also note, none of the alternatives considered in the FEIS are in Nevada. Portions of Segments 7 and 9 of the Preferred Alternative are approximately 30 miles north of the Nevada state line, primarily on private agricultural land (well over 100 miles from the Elko and Ely areas).
100814	KATIE FITE	WESTERN WATERSHEDS	Figure 2.2.4 does, however, show areas of "Potential Geothermal Energy Development". This includes the entire range of sage grouse and pygmy rabbit in Nevada including the Nevada Owyhee Canyonlands, the SWIP zone of development north-south through Nevada, significant wild and undeveloped areas of Oregon including the Trout Creek, Alvord Desert and Steens region and portions of the Owyhee. It also includes large swaths of the Jarbidge BLM lands, Bruneau BLM lands, and much the northern Snake River Plain and portions of the Idaho batholith. Anything that facilitates industrialization of this landscape will have a tremendous adverse impacts to sage grouse, pygmy rabbit and other important and sensitive species in this region, as well as rare aquatic biota. Development of various alternative energy – including geothermal energy facilitated by Gateway - would have a broad array of adverse effects to wildlife, recreational uses of public lands, and potentially even agriculture.	The comment is correct, this project and other foreseeable energy projects will result in new roads, new development, transport or use of hazardous substances and use of environmental pollutants/contaminants. Vegetation, wildlife habitat, and ground and surface waters will be affected. The analysis documented in the FEIS discloses these effects. Direct and indirect effects from the Gateway West Project are disclosed in Chapter 3. Refer to Chapter 4 for a discussion of cumulative effects from energy development.

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			<p>Tapping into or altering geothermal waters would accelerate aquifer depletion. Geothermal development would also deplete, alter and potentially destroy important recreational hot springs, or areas with important cultural importance to Native Americans.</p> <p>Large geothermal facilities themselves have a significant Footprint on the environment, and lead to further habitat loss, alterations and fragmentation. The Footprint includes new and/or expanded road networks. All the adverse effects associated with these - from elevated perches for sage grouse nest predators or pygmy rabbit predators in livestock-degraded landscapes that have suffered extensive alteration of shrub structure and denser sagebrush - to weed invasions from project-disturbed areas choking pygmy rabbit habitats - must be considered. There is also greatly increased human activity (including during sensitive wildlife wintering, birthing or nesting periods) associated with siting energy facilities in remote areas, as well as increased wildlife mortality on roads, or from collisions with infrastructure. This project will result in new roading, new development, transport or use of hazardous substances and use of environmental pollutants/contaminants. A broad array of effects on ground and surface waters may occur. These effects range from increased sedimentation (caused by new or expand road networks) that pollute and clog endangered or sensitive salmonid, springsnail or other habitats, to pollution/contamination from PCBs/other harmful utility industry chemicals, petroleum products, herbicides impacting waters and amphibians, or contaminating ground and surface waters – with impacts to aquatic species, wildlife, and human populations. Construction of expanded roads or facilities will alter hydrological processes, and may affect both ground and surface waters – and a broad range of native wildlife species, and human uses and enjoyment of wild land waters – including fishing opportunities. The condition of Sage-grouse brood rearing, especially in desertified livestock-depleted landscapes is tied to green vegetation on wet meadow and other areas. Many of these sites have already been greatly reduced and depleted – and agency use standards are typically far too lenient to protect what remains from grazing and especially trampling impacts. Roading alters hydrological flows, often creates long-standing pools or puddles of water in culverts or borrow pits, and these areas may harbor West Nile virus, of significant concern to sage-grouse and migratory birds. Plus, improved roading may be used to more intensively disturb habitats with grazing, place very damaging supplement, and have a welter of other adverse impacts. Roading and potential energy development linked to this EIS may alter or affect ground water infiltration, hydrological processes, and linked energy development that will be facilitated by this line may deplete ground or surface waters, may have significant adverse impacts to sage grouse brood rearing habitats, habitats for aquatic species, habitats for riparian-dependent migratory birds, etc. We Protest this.</p>	

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100814	KATIE FITE	WESTERN WATERSHEDS	A Supplemental EIS must fully examine the current condition (including both water quantity and quality and any documented changes over time up to this point) of springs, seeps and riparian areas across the affected landscape.	Effects on water quality are disclosed in Section 3.16 of the FEIS, effects on wetlands and riparian areas are disclosed in Section 3.9. A supplemental EIS is not required. The information on water quantity and quality presented in the FEIS is sufficient to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	How will any potential route with this project and the linked and foreseeable development amplify global warming effects and disruptions/losses to riparian areas? Or aid in further desertification of the uplands through potentially intensifying damaging grazing impacts? How will development of Gateway affect municipal watersheds?	Greenhouse gas emissions are estimated in Section 3.20.1.5 We did not discover any studies that indicate a transmission line would contribute significantly to global warming, or amplify its effects on riparian areas. If it does stimulate development of wind and solar energy as the commenter assumes, it is possible the Project may contribute in a minor way towards reducing global warming.
100814	KATIE FITE	WESTERN WATERSHEDS	Will this project promote more global-warming gas producing coal-fired plant emissions?	Greenhouse gas emissions are estimated in Section 3.20. Chapter 4 of the FEIS discusses foreseeable energy developments. Section 4.4.21 of that chapter discusses the CO ₂ emissions in relation to total emissions in each state crossed. If the Project does stimulate development of wind and solar energy as the commenter assumes above, and these sources replace coal-fired plants, it is possible the Project may contribute in a minor way towards reducing greenhouse gases. If additional coal-fired plants are added to the system, the opposite may occur. The final outcome is not foreseeable at this time.
100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the lack of systematic site-specific surveys.	Your protest is noted. See the BLM's response the protest you submitted (Appendix K to the ROD). Surveys are required prior to any ground disturbance. Refer to the requirements in Table 2.7-1 of the FEIS.
100814	KATIE FITE	WESTERN WATERSHEDS	A much broader range of alternatives must be developed to focus on conservation and responsible transmission siting that includes using existing corridors and disturbed areas wherever possible. There has been no systematic and fact-based examination of any "need" for the particular swaths.	The EIS includes an appropriate range of alternatives; refer to Section 2.4 of the FEIS. See Chapter 1 for the Purpose and Need for the Project.
100814	KATIE FITE	WESTERN WATERSHEDS	Promoting and relying on huge energy projects detracts funding, interest and incentives (both federal and private) from efforts to develop local conservation, and home-produced energy such as solar or wind-powered houses with power generated on-site. BLM failed to follow existing corridors, and failed to lay out a series of reduced impact alternatives in a clear, understandable manner.	The alternatives follow existing corridors for much of the route; see Tables 2.4-3 and 2.8-1 to -7. Your comment that the BLM failed to follow existing corridors is noted, however, we also note that the commenter objects to the use several of the corridors in this comment letter.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS treats nationally significant values of the public lands and important areas with little consideration. We are appalled at how little consideration is given to nationally significant biological resources and rare species that are affected and will be further imperiled or extirpated under the profligate development of public wild lands that this EIS promotes with many of the alternative routes. Two prime examples are sage grouse and pygmy rabbit.	The EIS treats public lands with great significance. In fact, many of the comments received on the FEIS complain that the BLM overly protects public lands. A majority of the comment letters and emails recommended that the route be placed on public land.

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100814	KATIE FITE	WESTERN WATERSHEDS	It is alarming to us that “mitigation” for mega powerlines is minimal, and consists largely of minor measures like fence reflectors and some “research” dollars, or conservation easements that typically allow abusive grazing, predator killing, and other harms to continue, or funds to Game Departments or BLM to once again study highly predictable wildlife declines and species loss will occur. The other standard “mitigation” is killing trees and shrubs – which often has significant adverse impacts and is not really “mitigation” but often is more aimed at appeasing livestock or trophy hunting interests. There is greatly inadequate consideration of the effectiveness and certainty of mitigation measures, and the actual conservation value and positive benefit of the measures that are proposed. We Protest this. Such damaging powerlines that carve up important habitats for sensitive species are virtually always given the greenlight – despite the long-lasting tremendous impact these developments have on wildlife, watersheds, native plant communities and much-increased risk of weed development, cultural sites, wild land recreational uses, etc.	The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMs) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance Management Plan, a Framework Plan for Restoration, a Framework Noxious Weed Plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans. Appendix N includes the PA for complying with the Historic Preservation Act. These plans have been revised and included in the ROD. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.
100814	KATIE FITE	WESTERN WATERSHEDS	BLM and the Forest must clearly state that impacts cannot be mitigated in many segments of potential routes for this line, and this has not occurred.	Mitigation plans are included in Appendix C of the FEIS. Following comments on the FEIS, the Proponents have offered additional mitigation for direct effects. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The FEIS disclosed that, even with the proposed mitigation, there would still be adverse impacts. For example, the fact that the effects on many KOPs would be high is disclosed in the effects analysis for each segment. One of the reasons for completing an EIS is that the Project would result in significant effects on the environment.
100814	KATIE FITE	WESTERN WATERSHEDS	This EIS must fully examine the large-scale deleterious effects of development of this and other foreseeable Corridors/projects, as well as other foreseeable linkage powerlines that will result, and provide some sizable mitigation funding and significant mitigation actions – not just giving agencies some funds to study grouse decline and kill some junipers, and fragment more habitats.	Chapter 4 of the FEIS discusses the adverse effects of this project, present and past activities, and foreseeable developments. The FEIS provides a level of analysis needed to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed. Mitigation is included in the project; see the requirements attached to the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	BLM must use the methodology and science in the Sage Grouse Conservation Assessment (Connelly et al. 2004) and the recent Knick and Connelly (2009/2011) Studies in Avian Biology, including information on long recovery periods for disturbed arid lands sagebrush communities (see also Baker and Bukowski 2013), to conduct a science based analysis of the direct, indirect and cumulative effects of the designation and/or development and use this as the basis for developing alternatives and determining any mitigation actions,	The Connelly et al. (2004) paper, requested for use by the commenter, states that "We are not aware of any approaches that would allow assessment of sage-grouse habitats and populations over relatively broad scales. The techniques so far developed appear most appropriate for mid to small-scale assessments and do not incorporate a simultaneous approach that includes both habitats and populations. However, Pedersen et al. (2003) recently described a model that simulates the effects of grazing and fire on

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			including mitigation by avoidance. The flawed HEA and other “models” are greatly inadequate, and they are often not based on systematic site-specific surveys and a determination of the relative importance of the land areas under all alternatives. This is a particular problem with winter habitats for sage-grouse, and other little-studied aspects of animal habitat needs across much of the project’s route and footprint.	temporal and spatial aspects of sagebrush and sage-grouse population dynamic. Although the model was used to assess a single population in eastern Idaho (Pedersen et al. 2003), this approach appears appropriate for applications at broader scales." However, the approach used by Pederson et al. (2003) was a stochastic population model, which is outside the scope of an assessment of any single transmission line project. The HEA analysis, as developed and approved by the interagency intergovernmental panel (which included the USFWS) incorporates many of the same features of the model described in Chapter 12 of Connelly et al. (2004). The EIS assesses the effects of “fragmentation and loss of habitats - including fire, livestock fences and other infrastructure, roads, existing and foreseeable energy development, powerlines, etc...” on sage-grouse. Impacts to sage-grouse populations are addressed through the Sage-Grouse Framework developed by the interagency-intergovernmental panel, which included the USFWS (see Appendix J of the EIS. The HEA for this project was developed by an inter-governmental working group, which incorporated input from the academic community, and utilizes the best available science. The assessment of sage-grouse is currently conducted at various distances, as required by state and federal regulations, including at 11 miles. [see Appendix L]
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS has not conducted current and updated habitat impact and fragmentation analyses for all sage grouse populations as described in the Connelly et al. 2004 Assessment and Knick and Connelly 2009/2011). It has not examined effects on local and regional populations, including the Northern Great Basin sage-grouse population. In many areas, claimed population increases of sage grouse from much more intensive sampling in the early-mid 2000s are now dropping. There has also been tremendous wildfire habitat loss of critical lek complexes and other habitats. In all of these efforts – the broader populations like northern Great Basin and the local populations, please examine the current effects of fragmentation and loss of habitats – including fire, livestock fences and other infrastructure, roads, existing and foreseeable energy development, powerlines, etc. How much intact little- fragmented sagebrush is left in these populations’ habitats? How will this project further alter and reduce this? Please project effects to populations over time with and without development of this mega utility corridor in the area. Please do this under all of a greatly expanded range of alternatives that focus on siting in disturbed areas.	Appendix J of the FEIS provides the documentation for the sage-grouse impact analysis. Section 3.10 of the FEIS analyzes fragmentation. We recognize that there are numerous ways to assess habitat and impacts to species. The HEA is one of the tools recommended as part of the Interagency Framework to analyze effects on sage-grouse. The HEA was recommended by the USFWS for identifying habitat services lost.
100814	KATIE FITE	WESTERN WATERSHEDS	In Scoping, we asked that you use analyses as found in ICBEMP and other current science-based assessments such as the ICBEMP Wisdom et al. 2002 species examination and other ICBEMP documents, also	Wisdom et al. (2003) was not used to create the habitat service metric for the Gateway West HEA for multiple reasons: 1) Wisdom et al. (2003) describe procedures to evaluate threats to

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			Nevada Wisdom et al. 2003 assessment, and the Wyoming Basin Environmental Analysis (WBEA) to examine the full range of ecological threats and habitat fragmentation that currently exists for other sensitive species, too. This has not been done. We Protest this.	<p>habitat at a scale and resolution that is appropriate for regional planning, but is inappropriate for the analysis of local project-level effects. The datasets and procedures described by Wisdom et al. (2003) are intended for application at large spatial extents (>100,000 hectares) with a 90 m² pixel resolution. The multi-agency working group assigned to the Gateway West HEA decided that a 30 m² pixel resolution was needed to capture adequate habitat and project detail for the Gateway West HEA. A habitat service metric based on the procedures described in Wisdom et al. (2003) would not be able to detect most local habitat service losses due to the project or local habitat service gains due to the habitat improvements proposed for mitigation. 2) Wisdom et al. (2003) use coarse species range data, which is efficient for a regional analysis, but does not utilize the best available data for sage-grouse at the local scale. Wisdom et al. (2003) describe, “Importantly, our definition of a species’ range says nothing about the spatial structure of the population inside each polygon, except to assume that one interacting population exists. This definition contrasts strongly with distribution maps of populations, often generated from documented occurrences of a species. Our definition also differs strongly from maps of predicted distribution of habitats for species, such as those produced by GAP analysis (Scott et al. 1993)” (p. 19). Again, the scale of the data used by Wisdom et al. (2003) is not appropriate to the HEA. The multi-agency working group for the Gateway West HEA insisted on using lek count data as an indicator of habitat use at a local scale. 3) Wisdom et al. (2003) do not provide methods for scoring of habitat services. They provide methods for scoring habitat threats, which is not a surrogate for habitat services. There are similarities between the methods used to develop the habitat service metric for Gateway West and the procedures described by Wisdom et al. (2003). Specifically, the procedures to estimate species habitat requirements are nearly identical to the process used by the multi-agency working group for the Gateway West HEA. Wisdom et al. (2003) describe an example in which habitats for sagebrush-associated species are designated from land cover types using the same process as was used for the HEA: “First, identify the vegetation coverage to be used, in this case the 90-m sagesitich map. Second, associate each species with the cover types known or considered to be source habitats, based on literature review and an evaluation by species experts with specialized knowledge of each taxon (e.g., birds). ... Last, identify other habitat and non-habitat factors beyond source habitats that also could affect species’ persistence, such as population size or presence of roads (e.g., Lee 2000, Marcot et al.</p>

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				2001)” (p. 21). The evaluation of threats is also similar between Wisdom et al. (2003) and the project effects modeled for the Gateway West HEA. Wisdom et al. (2003) describe a plausible modeling approach for representing increased predation risk near transmission lines that was also discussed by the multi-agency working group.
100814	KATIE FITE	WESTERN WATERSHEDS	Again, as mitigation, WWP requests that Idaho Power set up a substantial fund to purchase and retire public lands grazing permits across regions where sage grouse and other native wildlife habitats and populations will be adversely affected by this project. This EIS proponents should work with BLM and the USFS to contain language that amends Land Use Plans and allows for permanent retirement of grazing permits so purchased. We Protest that this has been ignored.	The proposed mitigation plan includes funds to purchase conservation easements on lands with substantial resource values and an endowment fund for managing these lands. Purchasing grazing rights was considered but not selected; purchasing conservation easements on private lands and inholdings in the NCA, as well as habitat restoration were considered more beneficial by the interagency team of biologists.
100814	KATIE FITE	WESTERN WATERSHEDS	This project claims to be decreasing “congestion” and enhancing capability of the grid, but the EIS does not provide necessary analysis to allow understanding of why only the Proposed Action or routes in that and only that location, would magically achieve this compared to a broad range of other alternative disturbed locations, conservation actions, and more localized energy development. In reality, this seems to be to export power from the region, rather than relieve local congestion. We Protest this.	Evaluating the merits of conservation or local energy production vs. building new transmission lines is beyond the expertise of the BLM and beyond the scope of this analysis. The BLM relies on other federal agencies to determine whether new lines are needed. Refer to Section 1.3 in the FEIS for details on routing and reliability.
100814	KATIE FITE	WESTERN WATERSHEDS	Will this facilitate additional phosphate mining, cyanide heap leach gold or other hard rock mineral mining, and linked mercury poisoning of regional airsheds and waters from this?	The FEIS is part of the NEPA process for the Gateway West Transmission Line. Its purpose is not to examine all potential impacts from possible development activities for other resources. Mining activities are discussed in the cumulative effects analysis in Chapter 4 of the FEIS.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS must fully examine the adverse effects to public enjoyment of cultural and historic sites, and potential adverse effects. WSA and roadless inventories (Lands with Wilderness Characteristics) must be conducted, and these lands identified and protected as part of this process.	An assessment of impacts to historic sites is provided in Section 3.3 of the FEIS. Cultural Key Observation Points (KOPs) were used to present the types of impacts that the project might have on public enjoyment of historic and cultural sites potentially impacted by the project. A wilderness characteristics inventory was performed for the Project. Methods and summarized results of this process are discussed in Section 3.17.1.6 of the FEIS. Inventory units potentially crossed by the Project that were identified to have wilderness characteristics were disclosed in this section of the EIS. Segments 4 and 7 were found to have inventory units with potential wilderness characteristics. Inventory survey forms and evaluations are included in the administrative record.
100814	KATIE FITE	WESTERN WATERSHEDS	Please provide mapping and analysis that overlays Dark Night Sky areas with the path. How will this project adversely impact the Darkness of Night Skies?	The towers will not have lights except near the military training area, as noted in Chapter 2. The project would have very little effect on the "dark sky".
100814	KATIE FITE	WESTERN WATERSHEDS	See for example http://www.abcbirds.org/abcprograms/policy/collisions/towers.html . This describes millions of birds being killed across the U. S. at	The effects to migratory birds are discussed in Section 3.10 of the FEIS. APLIC guidelines will be followed for construction specifications. See discussion in Section 3.10 on impacts to birds

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			transmission towers. The power line, its upright towers near ancillary facilities with night lights as well as potentially linked development pose a significant and unassessed and unmitigated risk that will very likely result in significant “take” of migratory birds.	from electrocution and collisions. Also see the Proponents’ Avian Protection Plans.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS has not addressed the likely amount of intrusive lighting that would be associated with various facilities, or with the developments that would be spawned, or developed efforts to avoid or mitigate this. We Protest all of these deficiencies.	The Project would not cause light pollution since all proposed structures are below 200 feet in height and FAA regulations do not require lights. An exception is the approach to the Saylor Creek Air Force Range. Low intensity lights compatible with night vision equipment would be installed in this area. The Project includes three new substations that would have lights, similar to existing substations.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS must do a much better job of describing the type of transmission, gas pipeline and other existing rights-of-way, as well as mining and other activities in or near all segments.	Chapter 4 of the FEIS covers cumulative effects of existing and foreseeable ROWs. Appendix M (Biological Assessment) contains a section on impacts of these actions and infrastructure on species of interest. While one can always wish more information was available, we believe that sufficient information on foreseeable activities is available to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	The Gateway EIS’s sage-grouse, pygmy rabbit and other wildlife baseline environmental information, data presentation and other analyses are greatly deficient. A Supplemental EIS must be prepared that provides a valid basis for development and full and fair evaluation of alternatives.	The analysis of general wildlife species (Section 3.10) and sensitive species (Section 3.11) is in compliance with NEPA, ESA, BLM, and Forest Service requirements, and has been reviewed by applicable agencies. Edits and additions requested by these agencies have been incorporated into the FEIS. We believe that sufficient information on these species is available to make an informed decision on impacts of the various Project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	This EIS is an abject failure in accurately describing the environmental baseline, in examining a viable range of alternatives, and in complying with sage-grouse and other biological conservation plans and protections for native biota of all kinds, as well as protection for long-recognized ACEC, wild land and recreation values of the public lands.	Chapter 3 of the EIS describes the existing condition for vegetation, wildlife habitat, and other resources. Additional information on habitat was added to the FEIS in response to comments and suggestions following publication of the DEIS. Cataloging all past activities and current uses for so vast an area is beyond the scope of this analysis. Additional information on the sage-grouse HEA model was presented to the public and comments were accepted and considered in developing the FEIS. Additional information on cumulative effects has been included in the FEIS. The wildlife sections (3.10 and 3.11) were prepared to meet requirements of NEPA, the Endangered Species Act, Forest Service and BLM special status species policy and other policies, and other applicable laws and statutes. The EIS discusses the risk of wildfire; however, developing a map with the fire history for Idaho, Wyoming, and parts of Nevada and Utah is outside of the scope of this document, as is providing an inventory of all fencing or a history of all grazing activity in this vast area. Managing grazing on lands crossed by the Project is beyond the scope of this analysis. RMPs, MFPs, and Forest Plans requirements on grazing would be followed.

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100814	KATIE FITE	WESTERN WATERSHEDS	We are very concerned about the reliance on the HEA and other models. HEA is supposed to be a “method of quantifying the permanent or interim loss of habitat services [what an absurd term!] from project-related impacts”. This model is not adequate to establish a valid mitigation/compensatory plan, or to regulate/mitigate or understand project activities and impacts during construction, operation and de-commissioning. It omits or downplays key elements of landscape setting and project context, the relative importance and scarcity of undeveloped wild habitats and landscapes impacted by Gateway routes, and many other key attributes necessary to understand impacts of all potential routes.	Appendix J of the FEIS provides the documentation for the sage-grouse impact analysis. We recognize that there are numerous ways to assess habitat and impacts to species. The HEA is one of the tools recommended as part of the Interagency Framework to analyze effects on sage-grouse. The HEA was recommended by the USFWS for identifying habitat services lost.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS must examine conditions to at least 10 miles distance from leks in the context of local populations, and fully consider that grouse may nest even further from leks and move over vast landscapes in the course of the year.	The assessment of sage-grouse is currently conducted at various distances, as required by state and federal regulations, including at 11 miles (See pages 3.11-3, 3.11-24, and 3.11-27 through 3.11-31 of the FEIS).
100814	KATIE FITE	WESTERN WATERSHEDS	There is no detailed population-by-population analysis of habitat quality and quantity, population status, and cumulative impacts and threats to the populations. FEIS Sections 3.10.1.4, 3.10.1.5, 3.10.2, 3.10.2.1 and 3.10.2.2 are greatly inadequate in establishing a species occurrence and habitat quality and quantity baseline.	Although detailed baseline data on population are not available for all areas for all species, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	Delaying surveys to “preconstruction” for bald eagle, black-footed ferret, burrowing owl, Columbian sharp-tailed grouse, ferruginous hawk, flammulated owl, greater sage-grouse, mountain plover, northern goshawk, Preble’s jumping mouse, pygmy rabbit, three-toed woodpecker, white-tailed prairie dog, Wyoming pocket gopher, midget faded rattlesnake, yellow-billed cuckoo, golden eagle, prairie falcon red-tailed hawk, Swainson’s hawk, and other species is greatly inadequate.	General field surveys and review of existing data were used to determine relative effects to species in the analysis areas. Site-specific surveys at the pre-construction stage will ensure that permit requirements regarding species restrictions are met during final construction layout. EPMs and federal and state regulations, in conjunction with these site-specific surveys, will ensure requirements for each species regarding siting limitations are met. Full surveys for all species along more than 3,000 miles of proposed and alternative routes, many of which changed between scoping and DEIS, and between DEIS and FEIS, would not be impractical even if we had access to all lands along these routes (which is not the case). The NEPA process does not require this level of detail,
100814	KATIE FITE	WESTERN WATERSHEDS	All late winter- summer periods should be off-limits to development. See FEIS 3.11.1.4. Vegetation mapping and methods are greatly inadequate (3-11.1.4).	Timing restrictions regarding specific wildlife resources are provided in Appendix I to the FEIS. As stated in the FEIS, using habitat models in conjunction with remote sensing and targeted field surveys is an acceptable approach. The length of the project would make site-specific evaluations for the full analysis area impractical. The NEPA process does not require this level of detail. Site-specific surveys will occur as part of the pre-construction survey process.

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100814	KATIE FITE	WESTERN WATERSHEDS	The COT Report (Budd et al.) is greatly defective, and we Protest BLM reliance on that political document in any way. The Sage-grouse COT report guts protection of vast areas long recognized as critical to sage-grouse, and where habitat is being actively restored for sage-grouse, and large areas of recognized BLM Priority habitats. This is a political document - one of the last FWS acts under Ken Salazar as Interior Secretary, and treats sage-grouse and sage-grouse habitats as expend-able. The report tries to use the names of recognized biologists who wanted nothing to do with this travesty of a political hatchet job on sage-grouse habitats. It demonstrates the failure of the state plans (like Idaho's) to conserve, enhance and restore sage-grouse populations. It is also weighted toward leks, and not the full array of habitats.	Your comments on the use of this report are noted. The final COT Report was prepared by the USFWS. The USFWS states that it is a peer-reviewed report that is based upon the best scientific and commercial data available at the time of its release.
100814	KATIE FITE	WESTERN WATERSHEDS	Regarding the Wyoming core areas - They were drawn up to purposefully exclude many sites where developers wanted to put energy and other projects, or where important ranchers held sway. Then, following the Core Area mapping, Wyoming has proceeded to look the other way as uranium mining and other development has taken place. Gross generalizations about sagebrush are made, complex communities are all lumped together, grazing, facility and other degradation and fragmentation and reductions in habitat quality and quantity are not adequately addressed. We Protest this.	It is outside of the scope this Project to assess the validity of the Wyoming Governor's Sage-Grouse Core Area Approach. Note that the USFWS has reviewed and accepted this approach.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS states: "the 'currency' under the ESA is the number of individuals in a population". First, we object to this characterization – especially from an entity that apparently does not understand that these individuals require undisturbed habitat and the Footprint of the project impacts crucial habitats in myriad ways unexamined in this cursory and incomplete EIS. Second, why is there no site-specific information presented on the CURRENT 2013 local and regional populations and number of individuals impacted of sage-grouse, Columbian sharp-tailed grouse and many other imperiled species?	Your objection to the term is noted. As you no doubt are aware, 2013 site-specific information would not yet have been collected when the FEIS was completed in early 2013; most areas were under snow at that time. The best available information provided by the state and federal agencies was used in the analysis. Although detailed population data are not available, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	Following on this "currency" – It is certainly necessary to understand how reduced populations have become, and predictions of how severe foreseeable declines will be –to understand the "value". How many individuals are found are in all populations in all areas traversed by all potential routes now? Are they viable? How will Gateway and potential linked developments reduce their viability? How are these populations defined, and what are their boundaries? How much available habitat, and of what quality is this habitat, for all existing populations. How will any potential route (such as the calamitous route by the Nevada border – and others in segment 7, or the southern Owyhee route in segment 9, or the various routes that cross the Idaho Deep Creek Range impact habitats and populations of rare and imperiled species? Also following on this "currency" scheme: Money can't buy you enough wild birds to make a sustainable population and make up for the destruction that you do --- If your	Clearly, the intent is not to buy wild birds. The intent is to provide money to purchase land or easements on land with sage-grouse habitat in order to protect these areas from development, as well as to restore damaged habitat (such as fire-damaged public lands). Acres disturbed is one measure; the HEA includes many parameters. Even if it were feasible to count all individuals "found are in all populations in all areas traversed by all potential routes now" across Wyoming and Idaho, this information in not needed to determine the relative effects that the alternatives have a greater effect on sage-grouse. Table 3.11-13g in Section 3.11 of the FEIS shows, for example, that alternative 7K would have a much greater impact on sage-grouse than the BLM's Preferred Route. Alternative 7K would disturb nearly 1,400 acres of

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			<p>route is essentially so damaging it is not mitigatable. This is the case with many portions of the various Alternative routes through intact sagebrush and other wild lands. Sage-grouse and other wildlife need a complexity of connected habitat types – and areas with suitable conditions resulting from topography, vegetation, water sources, etc. can not be replicated. Models based on fallacies or mere acreage replacement are divorced from understanding a species needs in time and space. We Protest the failure to consider the irreparable nature of the losses caused by Gateway's direct, indirect and cumulative effects, and the deficient and minimal measures in FEIS Sections 3.10 and 3.11 in their entirety. Sage-grouse and other wildlife are increasingly boxed into smaller and smaller areas – and industry like Idaho Power refuses to leave these blocks of remaining habitat alone while the BLM abdicates its duty as a steward of the public lands in failing to require that the energy industry route projects in existing Corridors and disturbed areas. Agencies cannot use "acres disturbed" in understanding impacts, or in determining mitigation and other measures. The cumulative impacts, and the entire Footprint of the project on a landscape species – like sage-grouse must be examined. The visual blight/intrusion, noise, roading, weed expansion, predator-promoting disturbance and all other impacts and the greatly expanded linked industrial development potential Footprint of all potential routes must be provided. DDC in the EIS is tied to the Wyoming core area concept model. WWP believes this Core area concept, and continuing and additional development and fragmentation that it allows is not adequate to conserve and protect sage-grouse in nearly all instances. But the Idaho Power EIS doesn't even conduct and present necessary minimal analysis to understand impacts on core areas. A great flaw of the Core concept is that it is focused on leks - and promotes sacrificing/triage of whole land areas and important wintering and other habitats if lek numbers and density are not as high as other areas. Thus, populations that may have fewer birds are being sacrificed. But sage-grouse across the Project Footprint are in such a perilous state that all efforts must be made to retain all populations – and not write some off just because a Core Model does not include them. In fact, reliance on the core concept can have devastating impacts – if, for example, a large wildfire removes the main Core Area in a region, or higher populations collapse due to disease or unforeseen events. Such shortcomings and risks must be fully examined – especially since the project heightens fire risk.</p>	<p>preliminary priority habitat, nearly 10 times as much as the Preferred Route. Although detailed population data are not included, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources.</p>
100814	KATIE FITE	WESTERN WATERSHEDS	<p>Density Disturbance Calculation information and analysis must be provided in a SEIS for all areas not just Wyoming. See 2010 Doherty et al. Westwide Sage Grouse mapping, but considerations must extend far beyond just this.</p>	<p>This Density Disturbance Calculation discussion in Appendix J is a component of the Wyoming Governor's executive order concerning greater sage-grouse management in Wyoming. The Governor's strategy for Wyoming has been accepted by the USFWS and the BLM. The Wyoming policy does not apply to Idaho. The Idaho Governor has developed a greater sage-grouse policy but it has not yet been accepted by the USFWS and was not used in this analysis.</p>

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100814	KATIE FITE	WESTERN WATERSHEDS	A full and fair analysis of the impact of this project on all affected habitats and populations of sage- grouse must be provided. How viable will all populations in all areas of the footprint of all potential routes be? How viable are they now? In 10, 20, 50 and 100 year time frames?	The FEIS provides a full and fair analysis of the impact of this project on sage- grouse. The FEIS discloses the effects on sage- grouse and the mitigation needed to compensate for impacts. The FEIS includes an HEA which identified mitigation for direct effects and, following comment on the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. While studies taking years to complete would provide additional detail, we believe that sufficient information is available to make an informed decision on impacts of the various project alternatives would have on sage-grouse.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS doesn't even guarantee that this minimal DDC level of analysis will be completed – even after a preferred Alternative is selected.	Per the requirements outlined in the BLM's IM and sage-grouse framework, the DDC is only required if the Preferred/Proposed Route is located outside of the Wyoming Governor's Corridor (as established by the Governor's Executive Order). As the BLM's Preferred Route passes through the Governor's corridor in core areas, a DDC is not required (as described in the intergovernmental framework as well as Section 3.11).
100814	KATIE FITE	WESTERN WATERSHEDS	There is no excuse for Idaho Power's failure to have conducted all of these analyses and provide them to the public at the stage of the DEIS. Informed full public comment cannot occur until this is done. The degree and severity of impacts of any route cannot be fully understood. It is also impossible for the agency to understand the need for additional or altered alternatives or how much mitigation would be required until this is done.	The analysis was completed by the BLM and cooperating agencies, not Idaho Power. Although detailed baseline data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	A large flaw in the Core Area concept (FEIS Figure 3-11-1) is that it is lek based. Thus, it may omit essential wintering, nesting, brood rearing or other habitats that are key to the survival of sage-grouse a landscape bird, and also that provide crucial connectivity.	Your opinion that using leks to identify the core-area is noted. The USFWS concurred with the Wyoming's approach. Re-evaluating the state's core area strategy is beyond the scope of this EIS.
100814	KATIE FITE	WESTERN WATERSHEDS	A SEIS must be prepared to provide a tremendous amount of information lacking in the SEIS for sage- grouse and all wildlife species habitats and populations, including US Forest Service MIS species. We can only conclude that Idaho Power is rushing to get this EIS shoved through before public outrage at these expensive and environmentally damaging transmission projects escalates further. As soon as an EIS process is completed, and a record of decision signed, Idaho Power could turn around the day after, and essentially sell the right-of-way to another party. If full analysis is not conducted now, there is no hope that it ever will be adequately done. Foreign developers, energy speculators, or anyone else could buy the right-of-way. Unless iron clad mitigation based on best available science and full current baseline data is laid out and alternatives impacts clearly understood, there is no way that impacts on species and their habitats will actually be minimized or properly mitigated.	Effects on Forest Service MIS species and on sensitive species are discussed in section 3.11 of the FEIS, as well as in the Biological Evaluation (BE) prepared for each Forest affected by the Preferred Alternative. Effects on listed species are discussed in Section 3.11 and Appendix M of the FEIS, as well as in the USFWS's Biological Opinion (BO). The BO and the enhanced mitigation package are included in the ROD (see the response to the previous comment).

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100814	KATIE FITE	WESTERN WATERSHEDS	Additionally, the methods described for Density Disturbance Calculation analysis are greatly inadequate. These include BLM using a DDC “tool” to automatically sum up disturbances within the DDC analysis area, and determine how many occur there. It appears the “disturbance” of a road will be treated the same as the “disturbance” of a powerline – yet the impacts are different and affect different species in various ways (tall visual object avoidance, road noise avoidance – for example). This project will often result in BOTH occurring in the same area. Is a mine disturbance the same as a fence? Is a fence considered a “disturbance”? Since fences cause very significant mortality to sage-grouse, certainly these too must count. Is herding thousands of domestic sheep and sheep camps annually situated on top of grouse leks a “disturbance”? Is a fire a disturbance? How in the world will all of this information be considered and integrated? Is a transmission line disturbance the same as an oil and gas rig disturbance?	This DDC discussion in Appendix J refers to the Wyoming Governor's executive order concerning sage-grouse management in Wyoming. The Governor's strategy has been accepted by the USFWS and the BLM. Revising the strategy is beyond the scope of this analysis. The Proponents have stated: "the density disturbance calculation that is used to determine compliance with disturbed land allowances within Core Areas." In addition, the Proponents have stated: "The HEA includes impacts during both construction and operation of the Project. Indirect impacts of noise and road disturbance are included and modeled in the HEA. Consistent with the analysis presented in the DEIS and Chapter 6 of the Addendum, additional potential indirect or unknown impacts are further mitigated through the robust steps taken during siting of Project facilities to avoid and minimize any potential impact. In additional, these potential indirect or unknown impacts will be even further mitigated and reduced through the implementation of the several environmental plans and measures, such as seasonal restrictions during construction and operation of the project." The BLM has required that the Project adhere to spatial and seasonal restrictions regarding when and where disturbances can occur to sage-grouse habitats (as required by BLM RMPs, IMs, and IBs).
100814	KATIE FITE	WESTERN WATERSHEDS	Sage-grouse use breeding habitats with much greater shrub canopy cover than just 10-25%. This must be corrected, and areas with greater canopy cover included. All mature and old growth sagebrush communities must be identified and protected. Where are these areas in the Project Footprint? This information is ignored. See Bukowski and Baker (2013) showing historical prevalence of mature sagebrush communities, including dense sagebrush. Managing for meager cover will greatly harm pygmy rabbits and many other species.	The text related to the shrub communities and percent shrub cover utilized by sage-grouse is based on current literature; in addition, the EIS assesses impacts to shrublands regardless of canopy closure (see the vegetation section).
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS mentions that sage-grouse are capable of traveling long distances. But there is not an adequate analysis of how and where sage-grouse from all affected populations move through or across the lands affected by all potential routes or project components and linked developments in the course of their annual cycle?	The analysis of sensitive species (Section 3.11) is in compliance with NEPA, ESA, BLM, and Forest Service requirements, and has been reviewed by applicable agencies. Edits requested by these agencies have been incorporated into the FEIS. The discussion of sage-grouse travel distances is followed by a discussion of potential sage-grouse habitat in Idaho and Wyoming and how much of that habitat is crossed by the Project. The direct and indirect effects discussion in Section 3.11.2.2 details impacts anticipated from the lines; taking into consideration habitat fragmentation, disturbance, and direct bird mortality impacts. These assessments take into consideration how these effects can impact the larger population and the determination of magnitude of effects and if the line is likely to contribute to species listings is based on considering species' populations within their range. The FEIS includes sufficient data for the decision makers to assess the

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				relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	Much more current and accurate information must be provided on the number of actually active leks in all four states based on comprehensive systematic baseline surveys within at least 10 miles of all potential routes. Some wildlife departments at times try to conceal how severe declines and losses have been in some areas. Full information on all lek counts for all periods of time for all affected populations of sage-grouse and sage-grouse habitat must be provided.	The analysis of sensitive species (Section 3.11) is in compliance with NEPA, ESA, BLM, and Forest Service requirements, and has been reviewed by applicable agencies. Edits requested by these agencies have been incorporated into the FEIS. The baseline data collection, remote sensing and survey methodologies for threatened, endangered, and sensitive species are discussed in Section 3.11 of the EIS. As is discussed in the EIS, lek presence was assessed at various distances from the route alternatives, including within 11 miles. The FEIS includes sufficient data for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	As part of this project, intensive baseline surveys and lek searches must be conducted across the affected habitat area and population – a minimum distance of 10 miles from all potential routes. Habitat quality and ecological conditions in this area, too, must be assessed and provided.	The baseline data collection, remote sensing and survey methodologies for threatened, endangered, and sensitive species are discussed in Section 3.11 of the EIS. As is discussed in the EIS, lek presence was assessed at various distances from the route alternatives, including within 11 miles.
100814	KATIE FITE	WESTERN WATERSHEDS	Table 3.11-3 provides only “Miles of Habitat Crossed”. Idaho Power cannot be allowed to get away with considering only the immediate area of the powerline as the project Footprint – as appears to be the case with info presented so far. What is the quality of all this habitat? When is it used, and how is it connected to large blocks of undisturbed habitats? How fragmented is this habitat? What is the habitat configuration – as sage-grouse habitat is not linear – and what are the threats to it? There is a significant difference in how states identify active leks – in Idaho – occupied once in 5 years, vs. Wyoming – occupied once in 10 years. WHY haven’t uncertainties “undetermined” status - within ten miles of all potential routes been cleared up by now?	The analysis in Section 3.11 represents the work of the BLM and the State Agencies, not Idaho Power. Table 3.11-2 lists miles of designated habitat crossed by type. Table 3.11-3 provides information on number of leks within specified distances of the Proposed Route centerline (ranging from 0.25 mile to 11 miles), while Table D.11-9, in Appendix D, provides this information for all route alternatives. Table 3.11-2 provides miles of designated greater sage-grouse habitat crossed by the proposed centerline. For miles crossed in Idaho, Key habitats, and restoration habitats (R1, R2, and R3) are all included. These classifications of habitat indicate exiting habitat quality (See page 3.11-10 of the FEIS).
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS 3-11-30 attempted to minimize impacts by looking at leks within a mere 0.6 miles of the Proposed Route in Wyoming. It states there are 9 leks occupied or undetermined within 0.6 miles, 66 leks (DEIS), now stated to be 42 leks in the FEIS within 2 miles, and 511 leks (DEIS), now 412 (FEIS) within 11 miles of the Proposed Route. What about all the other Routes, including the Idaho and Nevada route? WHY isn’t this information provided – for distances of out to 10 miles? Use of 0.6 miles is far too minimal – given all that is now known about how sensitive sage-grouse and other species are to visual, sound, roading and other habitat disturbance. The EIS further tries to minimize the colossal project footprint by claiming that the PR would cross through approximately 677.3 miles of suitable sage-grouse habitat. What about all potential routes? But moreso – focusing only on the exact linear path in no way addresses the full construction and	<p>The text provides a summary of the table results with a discussion of the minimum and maximum distances assessed. It would be cumbersome and confusing to write out the text description for each alternative route analyzed; however, as stated in the text, additional information is provided in Appendix D, Table D.11-9.</p> <p>Idaho Leks are mapped in Appendix E, Figure E.11-3 (Wyoming Leks are mapped on Figure E.11-2). Pygmy rabbit habitat was mapped for analysis in GIS and used to determine impact. This information is available upon request.</p>

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			operation disturbance impact of a mammoth transmission line. Why does mapping only show Wyoming leks, and not Idaho leks? Without mapping this – it is impossible to understand the location of the leks, or the impact of the project. We are dismayed to see despite the series of fancy maps, there is no mapping and identification of the very important pygmy rabbit habitat along all routes, of MIS species habitats, etc. We Protest this.	
100814	KATIE FITE	WESTERN WATERSHEDS	In understanding the degree and severity of impacts of the footprint of this development on wildlife species, rare plants, the health and integrity of native vegetation communities, it is essential that regional, local and site-specific mapping of current cheatgrass/medusahead and other weed presence, as well as risk of expansion, be undertaken.	Existing information is not sufficient to map the exact location of all weed infestations at a regional level; however, pre-construction surveys would be conducted to determine the location of weeds along the project, in order to inform preventative and control measures/programs. In addition mitigation measures and EPMS have been developed to minimize and control spread of weed infestations in project areas.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS woefully fails to provide information necessary to understand and visualize the degree and severity of impacts of project construction and rehab, and the risk of failure including during drought or as weeds invade in chronically grazing-disturbed landscapes.	Chapter 3 of the EIS describes the existing condition for vegetation, wildlife habitat, and other resources. Additional information on habitat was added to the FEIS in response to comments and suggestion following publication of the DEIS. Cataloging all past activities and current uses for so vast an area is beyond the scope of this analysis. Additional information on the sage-grouse HEA model was presented to the public and comments were accepted and considered in developing the FEIS. Additional information on cumulative effects has been included in the FEIS. The wildlife sections (3.10 and 3.11) were prepared to meet requirements of NEPA, the Endangered Species Act, Forest Service and BLM special status species policy and other policies, and other applicable laws and statutes. The EIS discusses the risk of wildfire; however, developing a map with the fire history for Idaho, Wyoming, and parts of Nevada and Utah is outside of the scope of this document, as is providing an inventory of all fencing or a history of all grazing activity in this vast area. Managing grazing on lands crossed by the Project is beyond the scope of this analysis. RMPs, MFPs, and Forest Plans requirements on grazing would be followed. The FEIS includes sufficient data for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100814	KATIE FITE	WESTERN WATERSHEDS	The FEIS woefully fails to provide detailed information on current ecological conditions, rangeland health status, degree of depletion of understory, condition of microbiotic crusts, etc. since many recent BLM assessments have been highly flawed and try to cover up livestock grazing and trampling impacts – new studies must be conducted in the footprint along all possible routes. We Protest that this has not been done.	Existing vegetation conditions are discussed in Sections 3.6 (Vegetation), 3.7 (Special Status Plants), and 3.8 (Invasive Plant Species). Environmental protection measures to prevent cheatgrass spread are included in Table 2.7-1 and Appendix C, and discussed in Section 3.8. The FEIS includes sufficient data on current conditions and likely changes to those conditions for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.

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100814	KATIE FITE	WESTERN WATERSHEDS	In addition, vehicles accessing or passing by the site (both workers and the public) will carry weed seeds to and through the Footprint – and livestock then transport seeds onto bare project-disturbed soils. We commented that as part of this process, any RMP amendment undertaken must amend RMPs to provide for Integrated Weed Management to overcome the standard BLM/FS “spray and walk away” approach. These amendments must include that no grazing occur on the disturbed lands of the project Footprint until recovery of native vegetation occurs. Grazing must be pulled back to existing pasture boundaries – i.e. the “pastures” through which the project and access roads pass must be closed to grazing use until successful rehab with native species is realized.	Refer to Section 3.8 for the discussion on weeds and mitigation measures proposed. There are multiple EPMs proposed to reduce spread of weeds, and prevent transporting weeds to new areas (See REC-1 through REC-15, WEED-1 through WEED-4, and OM-14; among others). The Proponents are continuing to work with the Agencies to refine the POD, including expanding on EPMs.
100814	KATIE FITE	WESTERN WATERSHEDS	In the case of any raptor electrocution, downed line electrocution, or construction-related wildfires caused by the line, the owner of the right-of-way (Idaho Power or any party IP may sell this to– as happened with SWIP) must be held responsible for the costs of rehabbing fires with native vegetation only.	The connectors on 500-kV lines are too far apart (19.5 feet) for a raptor to electrocute itself (Section 3.10.2.2 of the FEIS). No raptors (or other birds) have wingspans approaching that length. The FEIS includes protection measures addressing fire safety and control. Please refer to Table 2.7-1 of the FEIS.
100814	KATIE FITE	WESTERN WATERSHEDS	We are greatly concerned about the amount of herbicide and the types of herbicide that may be used. Instead of reliance on the spray and walk away approach, full and integrated IPM must take place. There is significant potential for soil contamination, drift including on windblown eroded soils, and many other problems with herbicide use. A solid protocol for effective treatment – including preventive actions and prudent post-rehab controls grounded in IPM must be established.	As stated in Section 3.8.2.2, any chemical control will be done in accordance with applicable local, state, and federal rules and regulations (EPM OM-13). Required procedures will be followed to ensure proper application.
100814	KATIE FITE	WESTERN WATERSHEDS	We also stress that there are no adequate protections provided here for prevention of excessive soil erosion, loss of microbiotic crusts, and many other adverse impacts of gateway.	The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMs) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance Management Plan, a Framework Plan for Restoration, a Framework Noxious Weed Plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans. Appendix N includes the PA for complying with the Historic Preservation Act. These plans have been revised and included in the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	We also believe that BLM’s Herbicide EIS is deeply flawed, and cannot be used as the basis for widespread application of herbicides here. Full adverse impacts of a battery of chemicals used in pygmy rabbit habitat, or spotted frog habitat, or sage-grouse nesting habitat, for example, have not been adequately examined. Rabbits may be exposed to chemicals while they are being applied, in soils in burrows, and on	The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMs) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance

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			vegetation consumed. Just how much herbicide, and what type, will be applied in association with any part of this project? Will sprayed dead zones be used around facilities?	Management Plan, a Framework Plan for Restoration, a Framework Noxious Weed Plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans. Appendix N includes the PA for complying with the Historic Preservation Act. These plans have been revised and included in the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	A much higher caliber Biological assessment must be prepared, and the EIS is not sufficient for and informed ESA consultation to occur. We Protest this.	The Biological Assessment has been prepared to ESA standards and provides sufficient information for consultation with the USFWS. The USFWS prepared a Biological Opinion (BO) on the Project. The BO is attached to the ROD).
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS is inadequate in presenting information and analysis for black-footed ferret, Canada lynx, Columbia spotted frog, gray wolf, grizzly bear, mountain plover, northern leopard frog, whooping crane, yellow-billed cuckoo, several spring snails, rare Colorado river fish, and other habitats including those of Forest MIS species.	Effects on listed species and other special status (MIS and BLM sensitive) species are discussed in Section 3.11. In additional, effects on Forest Service MIS and on sensitive species are discussed in the Biological Evaluation (BE) prepared for each Forest affected by the Preferred Alternative and effects on listed species are discussed in the Biological Assessment in Appendix M of the FEIS, as well as in the USFWS's Biological Opinion (attached to the ROD). The whooping crane is not in the Gateway West analysis area; therefore, it was not covered in the FEIS.
100814	KATIE FITE	WESTERN WATERSHEDS	None of the mapping shows all the access routes.	The maps in Appendix A show the routes considered in detail; Figure A-1 shows all of these routes, and the remaining figures show these routes by segment. The maps in Appendix O show the routes considered by not studied in detail. Many of the comments we received on the DEIS showed that the person submitting the comment thought routes listed in the map legend as "Alternative No Longer Studied in Detail" were still being proposed; therefore, we separated the two sets of alternatives to avoid confusion.
100814	KATIE FITE	WESTERN WATERSHEDS	All transmission line wires must be prominently marked to maximize visibility and reduce avian collisions. Visual analyses must be conducted using such marking. Any cell or other towers linked to this line must be "bundled" with other sites, and night lighting hazards minimized. Night lights, especially under cloudy conditions, appear to draw migrating birds in – and they are killed by collisions with wires or tower structures. This is also a concern with the various transformer and other sites associated with this line. "Bundling" of ANY such developments with other night sky light polluters must occur. We Protest the failure to do so. How much will this project and linked developments alter the darkness of night Skies in remote areas?	The Proponents will follow the avian management plan approved by the USFWS in marking connectors. The EIS does not require marking conductors except in special area, as noted in Section 3.10. The visual analysis was completed based on this assumption.

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100814	KATIE FITE	WESTERN WATERSHEDS	How much will dust pollute the air, and add to already very poor air quality in portions of Idaho suffering intensive dairy, feedlot and ag land air quality issues, or Wyoming in areas suffering oil and gas air pollution?	Impacts to air quality are discussed in Section 3.20 of the FEIS. Estimated emissions of criteria pollutants (which include fugitive dust emissions) from Project construction, operations, and total are provided in Tables 3.20-5 through 3.20-7. In addition, emission are summarized by state (Tables 3.20-10 and 3.20-11), areas of concern (3.20-12) and route (3.20-13). EPMs to reduce emissions and fugitive dust are included in the FEIS (See AIR-1 through AIR-5).
100814	KATIE FITE	WESTERN WATERSHEDS	In Section 3-11, the EIS lumps many sensitive species (BLM and Forest). This is greatly inadequate in addressing impacts, especially when Idaho Power hasn't bothered to conduct site-specific surveys across all potential routes. Species are lumped due to habitat requirements or life history traits. This is nonsense. EACH of these species is a species of concern, and has specific habitat requirements.	Analyzing effects on species based on habitat requirements is a reasonable strategy often used in NEPA documents prepared for projects that cross large areas and different habitat types.
100814	KATIE FITE	WESTERN WATERSHEDS	We commented that this entire part of the EIS and its meaningless Appendix Tables must be re-done and detailed baseline surveys, analysis, and mapping occur.	The detailed information in the Appendix D tables is quite meaningful to people interested in comparing impacts from the alternatives. The analysis of sensitive species (Section 3.11) is in compliance with NEPA, ESA, BLM, and Forest Service requirements, and has been reviewed by applicable agencies. Edits requested by these agencies have been incorporated into the FEIS.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS refers to Tables buried deep in Appendices – Table D 11-1 and D-11-2. When a reader looks at these Tables –only simplistic information is found. If species are present, entire segments are where found are numbered, with no specificity of any kind on where in the segment they may be found. Thus there is no way to possibly understand the impacts of the project, its access roads, and entire habitat alteration and destruction Footprint on habitats and populations, and how population viability will be impacted. The species include California bighorn sheep, black-tailed prairie dog, Brazilian free-tailed bat, American marten, and a host of other very important species.	We do not agree that “only simplistic information is found.” The EIS, and the tables in Appendix D, provide an appropriate level of information for a project that covers approximately 3,000 miles of proposed and alternate routes studied in detail. The EIS provides sufficient data to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed. Maps are provided that can help the reader to interpret information for a specific area. Several people commenting on the DEIS requested more detailed maps, e.g., maps that showed individual private parcels. The Project Web site added a link to maps at that scale.
100814	KATIE FITE	WESTERN WATERSHEDS	EIS 3-11-55 to 58 has MIS species for only one two Forests. Sawtooth Forest MIS species - or any others impacted by any potential route must be considered. And is there only one MIS species on the Caribou-Targhee? We Protest the failure to clarify this.	Not all MIS are discussed because only those located in the analysis area. Refer to the Biological Evaluation (BE) prepared for each Forest for additional details.
100814	KATIE FITE	WESTERN WATERSHEDS	TES Plan amendments include Medicine Bow permitting Gateway Proposed route intrusions into northern goshawk habitats. This should not be allowed, due to viability concerns. The same applies to golden crowned kinglet habitats, Lincoln's sparrow habitats, snowshoe hare habitats, three-toed woodpecker habitats, Wilson's warbler habitats	Refer to Appendix F-2 for an analysis of this proposed amendment. Refer to Section 3.10 of the FEIS and to the Biological Evaluation (BE) prepared by the Medicine Bow NF for a discussion of the effects on these species.

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100814	KATIE FITE	WESTERN WATERSHEDS	There must be much more concern and consideration given to intensive surveys and avoidance of all raptor species nest sites during sensitive nesting periods. Golden eagles, for example, may start nesting in January. No project construction (including road activity) can be allowed during sensitive raptor nesting periods. The EIS minor mitigation and avoidance actions are greatly inadequate, especially for species facing such unprecedented threats. Have detailed site-specific surveys over an area 10 miles from the Project been conducted?	As stated in Section 3.10 of the FEIS, surveys were conducted within the analysis area where deficiencies were determined in the existing databases (See Section 3.10.1.4). EPMs, mitigation measures, and timing restrictions, are presented in the FEIS. Discussion of direct impacts on raptors and mitigation and timing restrictions are discussed on pages 3.10-38 through 3.10-41. Appendix I presents timing and spatial restrictions for wildlife.
100814	KATIE FITE	WESTERN WATERSHEDS	All the EIS does here is leave the door wide open for Idaho Power (or whoever the ROW might be sold to) to pressure BLM or the Forest to issue waivers. BLM, in particular, does this all the time in Wyoming for Oil and Gas, and also issues waivers for wind energy - as in Nevada Spring Valley Wind. In fact, the so-called "mitigation measures"/ avoidance periods have often been routinely waived for industry. The Forest leasing is typically overseen by BLM. So the EIS's that promised mitigation/ avoidance really weren't worth the paper they were written on. Gateway's supposed "mitigation measures or "EPMs" and other readily waived non-protections. The DEIS states" "a list of all state and federal restrictions can be found in Appendix 1; the Project would be required to comply with all agency timing restrictions unless an exception is granted by Agencies". This leaves the door wide open for Idaho Power to exert political pressures through backroom methods and get any supposed mitigation and protections promised to the public cast aside as the project is built and operated. Not only are the Gateway FEIS mitigations are greatly inadequate and do not take into account the increasingly dire straits many of these species are now in –like native raptors, migratory birds and sage-grouse, they can be waived at any time. We Protest this.	We see no reason to assume that mitigation measures will be waived. The fact that the BLM has an exception process does not mean that exceptions will be granted. In fact, the process, which requires agreement by multiple agencies and on-site inspectors, makes it likely that a mitigation measure will be enforced. Note that the FEIS states: "There is no exception process for NFS lands; all closure periods will be adhered to."
100814	KATIE FITE	WESTERN WATERSHEDS	Further, many of the agency boilerplate mitigations have proven completely inadequate to protect species like sage-grouse and many other rare animals and rare plants, and much more conservative and protective measures must be put in place. All high quality habitats for species must be avoided to the maximum extent possible. WHERE are these habitats – for all species of concern? A reader of the EIS cannot tell.	The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMs) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance Management Plan, a Framework Plan for Restoration, a Framework Noxious Weed Plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans. Appendix N includes the PA for complying with the Historic Preservation Act. These plans have been revised and included in the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the failure to depict where along the line and the surrounding landscape there is habitat, and to analyze the quality and quantity of the habitat.	Habitat information is mapped in Appendix E. Habitat analyses were conducted for species and reported in Sections 3.6 through 3.11. Methods for literature reviews, remote sensing analyses, and targeted field surveys and analyses are also discussed in these sections.

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100814	KATIE FITE	WESTERN WATERSHEDS	Any Plan amendments must consider much more protective measures for any intact habitats – rather than gutting the already poor protections, as this EIS would do with its many amendments. Why doesn't this EIS also amend the Green River RMP to prohibit Gateway to be built within 0.25 miles of sage grouse leks, or to ban such large-scale intrusions into goshawk habitats in the Caribou Plan area? The EIS does not adequately disclose impacts.	Your comment on adding more protective measures is noted. The effects analysis for goshawk did not indicate that the project would have a significant adverse impact on the species in the Caribou NF due the relatively minor amount of the project compared to the habitat available on the Forest.
100814	KATIE FITE	WESTERN WATERSHEDS	This project must be routed to avoid Canada Lynx LAUs and linkage areas. Please develop alternatives that do this in a greatly revised EIS. It is impossible to understand the project impacts on Columbia spotted frog, rare mollusks or any aquatic species since adequate and detailed mapping of access roads and other disturbance has not been provided and overlaid.	Effects to aquatic species are discussed in Sections 3.10 and 3.11. Sedimentation assessments are discussed in Sections 3.15 (Soils) and 3.14 (Water). Further information on sensitive species is included in Appendix M (Biological Assessment).
100814	KATIE FITE	WESTERN WATERSHEDS	Alteration of hydrology and flow patterns, release of pollutants, increased predators, sedimentation, and many other adverse impacts are highly likely. We Protest the lack of clarity.	Effects to streams and sedimentation are discussed in Sections 3.15 and 3.16. Predation effects are discussed in Sections 3.10 and 3.11. Chapter 3 discusses many resources, their existing conditions and analyses of effects from the Project.
100814	KATIE FITE	WESTERN WATERSHEDS	It appears segments of a potential route in segment 7 in Cassia County are located near the Jim Sage bighorn sheep population is that the case?	Alternative 7H in the DEIS would have been in proximity to the northern portion of the Jim Sage bighorn sheep population. This alternative was dropped from consideration. Alternative 7K is the closest remaining alternative near this bighorn sheep population, and is greater than 5 miles from the Jim Sage bighorn sheep winter range.
100814	KATIE FITE	WESTERN WATERSHEDS	Sage-grouse discussion in FEIS 3.11. This entire section must be re-done and solid comprehensive baseline information collected and presented so that impacts can be understood.	The analysis of sensitive species (Section 3.11) is in compliance with NEPA, ESA, BLM, and Forest Service requirements, and has been reviewed by applicable agencies. Edits requested by these agencies have been incorporated into the FEIS. Although detailed baseline data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS states that “arid landscapes can take many decades to restore”. Disturbed low sagebrush ,black sagebrush Wyoming big sagebrush, juniper communities and many other areas can take hundreds of years to restore. Citations for the tremendous amount of time that disturbance, even under the best of circumstances, will persist must be provided.	Your comment is noted. It is understood that many landscapes take a long time to restore. This knowledge was the basis for the statements in the EIS.
100814	KATIE FITE	WESTERN WATERSHEDS	Idaho Power has offered only limited EPMS, and these are greatly inadequate to “help avoid, minimize, and mitigate direct, indirect impacts on GSG” as the proponent claims they are supposed to do. These EPMS look like something from the 1950s. They are also greatly	The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMS) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several

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			inadequate to conserve, enhance and restore sage-grouse, as required by the BLM's current conservation policies, and described in the NTT Report. We Protest these limited EPMs.	appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance Management Plan, a Framework Plan for Restoration, a Framework Noxious Weed Plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans. Appendix N includes the PA for complying with the Historic Preservation Act. These plans have been revised and included in the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	Idaho Power proposes to survey only "all gsg leks determined to be within one mile of the centerline of the project". This must be increased to within 5 to 10 miles of the line or any access route. There is zero winter or other habitat avoidance. There should be no activity allowed within five miles of ANY lek in ANY habitat. Surface disturbance and occupancy must be prohibited within 5 miles of occupied leks –not the ridiculous 0.6 miles. We Protest the failure to adopt this minimal protective measure. FEIS 3-11-62, 63	The text quoted in the comment refers to EPMs regarding surface occupancy and timing restrictions. The EPM regarding survey areas and methodologies is TESWL-5 and states that "Proponents will provide the Agencies a list of the protocols that the Proponents will use during greater sage-grouse and sharp-tailed grouse pre-construction surveys. The Agencies will either approve these protocols or suggest alternative protocols to be used."
100814	KATIE FITE	WESTERN WATERSHEDS	Idaho Power cannot rely on the greatly inadequate WY Core-derived industry-centric 0.6 mile NSO federal lands only, and no waivers can be allowed. FEIS 3-11-62, 63 for example.	Your comment that Idaho Power cannot rely on the greatly inadequate Wyoming Core-area and 0.6 mile NSO is noted, as is your objection to reducing the temporal avoidance requirement through the BLM's established exception process described in EPM WILD-1. Please note that Idaho Power is not proposing to construct a transmission line in Wyoming.
100814	KATIE FITE	WESTERN WATERSHEDS	We strongly oppose Idaho Power cutting away its already minimal protections when it comes to mitigation on private or state lands. Idaho Power even tries to get out of any lek protections if "agriculture, a highway, or line of sight barrier is present.	Noted. The reasons for considering existing features such as roads are included in the HEA.
100814	KATIE FITE	WESTERN WATERSHEDS	The same protections must be applied across the board on all land ownerships.	The BLM has no authority to require any protective actions on private lands.
100814	KATIE FITE	WESTERN WATERSHEDS	"Agriculture" could be a narrow dryland wheat field. What exactly is a "highway" - a minor paved road? "Line of sight" does not affect sound, blasting, helicopter use and other disturbance. It is impossible to understand how any of this would be applied, as necessary current surveys have not been conducted. Plus the nuts and bolts of all the disturbances that would occur in project construction and operation have not been provided. We Protest this.	The term "highways" does not refer to paved roads; generally it refers to state highways and interstate highways as defined in the Streets Access database. "line-of-sight" information is based on the Green River RMP. This discussion relates to sage-grouse responses to vertical structures in their view. EPMs further define major disturbances and the text specifies that vegetation clearing would occur at specific times to minimize impacts from disturbances such those resulting in noise impacts.
100814	KATIE FITE	WESTERN WATERSHEDS	Why have agencies only applied precautions to sage-grouse pre-construction surveys? These should be applied to all migratory birds and raptors, and sensitive mammal species, too.	Pre-construction survey EPMs apply to species other than sage-grouse. For example WILD-9 discusses avoiding vegetation clearing during avian breeding season and actions to be taken if active nests are found during preconstruction surveys.
100814	KATIE FITE	WESTERN WATERSHEDS	Necessary site-specific studies must occur over all potential routes to determine any potential winter habitat, and it must be avoided. How is	Winter Concentration Areas have not been designated by the State to date. TESWL-10 states: "Sage-Grouse – If Winter

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			“winter concentration area” described? How might this vary from year to year depending on snow depth?	Concentration Areas for the greater sage-grouse are designated, there will be no surface disturbances within the designated areas from November 1 through March 15."
100814	KATIE FITE	WESTERN WATERSHEDS	ALL project activity must be prohibited during migratory bird nesting season. There is no consideration whatsoever for migratory birds, including many rare and sensitive species like loggerhead shrike, brewer's sparrow, sage sparrow, and many others. This should extend from March 1 through July 1, at a minimum and longer in higher elevation areas.	The wildlife sections (3.10 and 3.11) were prepared to meet requirements of NEPA, the Endangered Species Act, Forest Service and BLM special status species policy and other policies, and other applicable laws and statutes. Precautions are applied to all migratory birds, raptors, and sensitive mammals (see Mitigation Measures in Sections 3.10 and 3.11). Brewer's sparrow, loggerhead shrike, and sage sparrow are addressed in Section 3.11. Several EPMs and agency mitigation measures are designed to avoid or minimize impacts to migratory birds (see Mitigation Measures in Sections 3.10.3 and 3.11.3). Clearing of vegetation would generally not take place from April 15 to July 31, and preconstruction surveys for bird nests will take place. Birds that do not have special status cannot be addressed individually in Section 3.10 due to the huge number of species present within the Analysis Area.
100814	KATIE FITE	WESTERN WATERSHEDS	There is a great disparity in MFP-RMP and Forest Plan ages and thus of consideration of ACEC or other protections for special, unique or rare areas, especially in sagebrush habitats, in a modern day context. As part of this process, full surveys must be conducted, and areas with exceptional value completely avoided, as well as Land Use Plans amended to provide RMP protections such as ACEC status. We Protest the failure to do so.	This comment is part of the WWP's Protest of BLM plan amendments. Please refer to the BLM's official response to the protest (Appendix K to the ROD). In regard to the age of Forest Plans, all three plans were completed in 2003 (the Sawtooth Plan was Amended in 2012).
100814	KATIE FITE	WESTERN WATERSHEDS	3.11. No crossing of Rock Creek-Tunp can be allowed. It is not sufficient “mitigation” for any part of this project to put some flight diverters on a fence.	Your comments are noted. Refer to the Mitigation Plan attached to the ROD for information on the mitigation required.
100814	KATIE FITE	WESTERN WATERSHEDS	This has got to be the most meager and measly mitigation ever seen in recent years: If the Kemmerer RMP is amended, fences within a mile will get reflectors and maybe some sagebrush seedlings will be transplanted. Instead of putting reflectors and still leaving a source of mortality standing, significant reductions in fencing i.e. fence removal - all along the project footprint must be considered.	Your comment is noted. Refer to the Mitigation Plan attached to the ROD for information on the mitigation required.
100814	KATIE FITE	WESTERN WATERSHEDS	But first a solid baseline of the fence density and impacts across the Footprint must be provided. This has not been, and the EIS fails to even consider basic alternative actions under NEPA and as mitigation for any development.	The HEA includes an estimate of fencelines. Detailed mapping of all fences across Wyoming and Idaho is beyond the scope of this project-level analysis and is not needed to assess effects.
100814	KATIE FITE	WESTERN WATERSHEDS	Indirect impacts to GSG are described as increased disturbance and poaching along the ROW “due to an increase in human activity created by new access roads”. How many miles of new roads would be needed under all alternatives, and where would they be located? How about road upgrades? We Protest the failure to clearly lay out this basic information.	A discussion of new road miles is provided in Section 3.19. Roads were mapped in GIS based on indicative engineering. Detailed maps for access roads are provided for National Forest areas. The BLM has identified mitigation measures to limit disturbances in riparian areas and near waterbodies, and any disturbances that cannot be avoided through micro-siting would require site-specific crossing plans, see TESWL-1. TESWL-1 states: “These plans shall: 1) demonstrate that vegetation removal is minimized; 2)

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				show how sediment would be controlled during construction and operation within wetland and riparian areas; 3) attempt to intersect the wetland or riparian habitat at its edge; and 4) provide measures to restore habitat and ensure conservation of riparian microclimates. This plan must be submitted to the appropriate land-management agency and approved prior to construction of any portion of the Project within sensitive riparian habitat.”
100814	KATIE FITE	WESTERN WATERSHEDS	Plus the line would increase predation and level of predatory harassment. The EIS describes raven problems – it is our direct observation that livestock grazing activities significantly increase raven presence – especially during nesting season. Example: Jarbidge BLM where extensive supplement feeding is permitted by BLM, and ravens lured to supplements. Dead livestock, afterbirth and other carrion across grazed BLM and Forest land provide abundant food, as well. We have also observed ravens flipping over cattle manure to eat insects underneath. Reduction in grass heights and simplification of sagebrush structure from livestock breaking or eating shrubs also decreases protective cover and makes more vulnerable to predation of all types. So all components of livestock use negatively impact sage-grouse, and are part of the serious direct, indirect and adverse impacts that must be considered. Significant mitigation of all of these effects – not just sticking shiny objects on a very limited area of fence must be undertaken. We Protest the failure to conduct this analysis.	Increased predation due to ravens is discussed in Section 3.10. The adverse impacts due to grazing are discussed in Sections 3.10 and 3.11. Conducting a detailed analysis of grazing across a thousand miles of rangeland is beyond the scope of this EIS. The BLM is currently conducting an analysis of grazing levels under a 2011 court decision. This includes amending 16 land management plans in 6 western states based on the new analysis where appropriate.
100814	KATIE FITE	WESTERN WATERSHEDS	New or increased accessed routes would also increase easy livestock movement corridors – resulting in extending intensive disturbances. Why does the EIS not include the March 2010 Federal Register Warranted But Precluded consideration of tall structures, road disturbance and many other adverse impacts, as well as all the discussion in many of the chapters in the Knick and Connelly 2009/2011 Studies in Avian Biology? We Protest this.	The EIS recognizes that tall structures have been identified as a factor, along with other factors such as fire. The Preferred Route is consistent with the Wyoming sage-grouse policy and avoids PPH for sage-grouse to the extent practicable. Mitigation is provided for the loss of habitat. Appendix J of the FEIS provides the documentation for the sage-grouse impact analysis. We recognize that there are numerous ways to assess habitat and impacts to species. The HEA is one of the tools recommended as part of the Interagency Framework to analyze effects on sage-grouse. The HEA was recommended by the USFWS for identifying habitat services lost.
100814	KATIE FITE	WESTERN WATERSHEDS	3.11-71 states that compensatory mitigation cannot be developed until a quantitative assessment of potential impacts has been finalized, because the magnitude of direct and indirect impacts needs to be disclosed. Well, there is a tremendous amount of multi-year work that must be done before this can happen. Removal of fences and retirement of grazing must be considered. Full and detailed analysis of the environmental effects and effectiveness of any “mitigation” must be provided. The quality of the habitat altered, lost, or destroyed must be fully considered.	We were not able to find this line on page 3.11-71 of the FEIS or on any page in Section 3.11. The HEA was prepared to assess mitigation needed to compensate for impacts to sage-grouse (Appendix J to the FEIS). The mitigation plan is included with the ROD. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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100814	KATIE FITE	WESTERN WATERSHEDS	The EIS has no basis for its claim that after a hodgepodge of mitigation, the project would be “not likely to contribute to a trend toward federal listing or loss of viability for GSG” or other sensitive BLM and Forest species. Several of the potential routes in Wyoming and Idaho and by Nevada would pierce and permanently alter and degrade significant less disturbed habitats.	Refer to the USFWS's Biological Opinion included in this ROD for a confirmation of this conclusion. Refer to Appendix C-3 (Sage-Grouse Avoidance, Minimization, and Mitigation Plan), Appendix J-1 (Sage-Grouse Impact Analysis), Appendix J-2 (Habitat Equivalency Analysis) of the FEIS, as well as the revised mitigation Plan included with the ROD. Note that no land in Nevada is crossed by the Project.
100814	KATIE FITE	WESTERN WATERSHEDS	For raptors, there is one Map with Nevada info. This is Appendix E, Map 10-6 where the map depicts one raptor nest and/or roost in Nevada - a golden eagle. Since there have not been major mines or energy development here, how extensive have any previous surveys been? It is ridiculous for Idaho Power to have us believe that there is only one known raptor nesting location in this wild land area.	The FEIS did not include any routes in Nevada; therefore, the maps in Appendix E of the FEIS do not show resources in Nevada.
100814	KATIE FITE	WESTERN WATERSHEDS	Plus, there is habitat for avian species of significant concern – including pinyon jay, black-throated gray warbler, Virginia’s warbler, juniper titmouse, and other migratory songbirds that may inhabit sagebrush and pinyon-juniper systems.	Brewer's sparrow, loggerhead shrike, and sage sparrow are addressed in Section 3.11. Several EPMs and agency mitigation measures are designed to avoid or minimize impacts to migratory birds (see Mitigation Measures in Sections 3.10.3 and 3.11.3). Clearing of vegetation would generally not take place from April 15 to July 31, and preconstruction surveys for bird nests will take place. Birds that do not have special status cannot be addressed individually in Section 3.10 due to the huge number of species present within the Analysis Area. Pinyon-juniper habitat is discussed in Section 3.6.
100814	KATIE FITE	WESTERN WATERSHEDS	Review of the greatly inadequate Appendix 1 – Land Use Plan Seasonal Stipulations has significant omissions – of protective measures. We Protest this.	There is no Appendix 1 to the FEIS. If the commenter is referring to Appendix I - Wildlife Stipulations, all land use plans were reviewed for seasonal restrictions to present known restrictions and protective measures regarding wildlife resources.
100814	KATIE FITE	WESTERN WATERSHEDS	We protest the failure to provide all necessary Key Observation Points for assessing visual impacts – for humans as well as understanding potential impacts on sage-grouse. Each sage-grouse lek, wintering area, or other important use areas must be KOPs. Any visual impacts on any roadless or significant intact habitat must be provided, and KOPs established and impacts studied.	Visual analyses were conducted in accordance with the BLM and Forest Service methodologies. See Sections 3.2, 3.3, and Appendix G.
100814	KATIE FITE	WESTERN WATERSHEDS	The visibility of the metal uprights and line will change greatly during different times of day. In morning and/or evening, when light is hitting it at a low angle, highly visible bright reflections may occur that result in high visual disturbance several miles from the line. We have observed this repeatedly with transmission lines, such as the existing line to the east of Salmon Falls Reservoir. We note that the photos used for KOP show very significant signs of livestock use and degradation. Some Examples of ecological concerns that are not addressed in the EIS but that show up even in the KOP images: Viewpoint C8 shows heavy to severe use of herbaceous vegetation in lower left photo, and cow manure clearly visible as well. E3=31 C63 shows signs of extensive degradation of understories – with weeds both along dirt track as well	The scenery analysis focused on places where the proposed transmission line would affect people. Section 3.3 discusses effects on historic trails and other historic sites where the setting contributes to the site's eligibility and Section 3.2 discusses the Project effects on scenic resources, including recreationalists and residents. Visual analyses include conditions at the time photographs were taken. This information is provided in all simulations and is discussed in Section 3.2 and Appendix G. Livestock use is addressed in multiple sections of Chapter 3 of the EIS as well as in the assessment of cumulative effects (Chapter 4.0).

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			as extending outward into the sagebrush community (cheatgrass, some halogeton). This highlights how the EIS woefully fails to adequately consider and categorize the ecological condition and health of existing understories, the vulnerability of less disturbed sites to weed proliferation, the harms caused by chronic livestock grazing disturbance, and the difficulties any rehab will face – especially of grazing is continued in pastures traversed by this line. If one looks at photo E-3-36 - one sees that the illustration of powerline visual effects include large round bare disturbed areas at the base of each transmission tower unit, along with a linear path of disturbance. These areas will be highly vulnerable to weed invasion – and livestock will promote proliferation into surrounding areas. Plus, livestock will concentrate by, rub on, wallow by, and otherwise continue to disturb lands by any posts or tower legs – amplifying weed problems, through disturbance and deposition of weed-promoting manure. This will all increase the risk of flammable weeds, and use of harmful herbicides. The serious adverse effects of existing impacts and desertification caused by livestock grazing disturbance, including continued chronic disturbance over the life of the line, must be analyzed and mitigated. These impacts remain ignored in the FEIS. We Protest this. We are also alarmed at the undeveloped wild landscapes this mammoth line would impact – Here are a few examples – but the same concerns apply to the rest of the photos, as well: Figure E 3.19-Sublette Cutoff. The sagebrush landscape in the Tump range appears to provide a continuous block of unfragmented habitat in the center and eastern part of the photo. However, the stream in the photo shows many signs of livestock degradation – including sparse willows, unvegetated cut banks, and many other problems. E 3-23 shows what appears to be very important less fragmented habitat. C40 shows hugely intrusive visually disruptive transmission structures. What a hideous eyesore! Photos 3-27, 3-29 show intact habitats.	
100814	KATIE FITE	WESTERN WATERSHEDS	These are just an example of some of our many concerns. Full analysis of adverse visual effects of roads and structures from all leks and important habitats must be undertaken.	The scenery analysis focused on places where the proposed transmission line would affect people, rather than visual effects from the perspective of sage-grouse. Refer to the wildlife section and Appendix J for impacts to sage-grouse and to their habitat.
100814	KATIE FITE	WESTERN WATERSHEDS	The information in the FEIS remains poor and incomplete. For example, a viewer seeking to understand vegetation communities is provided with a single map – “GAP Habitat” which only shows “shrublands” – lumping ALL sagebrush together, and forests/woodlands – lumping all trees together. There is no indication of how much has burned, the presence of cheatgrass in understories or completely dominating the landscape. As “cheatgrass “grasslands” are apparently mapped the same as crested wheatgrass areas, or others. Mountain big sagebrush is different from low sagebrush from Wyoming big sage, from salt desert shrub, etc. There are greatly varying	The FEIS is a large document. Essential information was provided in order to give the Agency and public reviewers the ability to assess project impacts and determine relative effect between Alternatives. Detailed mapping information regarding habitat quality and disturbance is available by request. This information has been summarized in Appendix D. In addition, not all habitat variations and ecological analyses are necessary for the NEPA-level Project-specific impact assessment.

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			disturbance/fire return and recovery intervals for these communities. See Knock and Connelly 2009/2011, Bukowski and Baker 2013, and full analysis of vegetation destruction and promises about rehab and mitigation require understanding both difficulty and rate of recovery – if it is even possible. We Protest the lack of analysis.	
100814	KATIE FITE	WESTERN WATERSHEDS	We stress that this is also very important in understanding the risk of rapid project-caused or other wildfire spread. It has become increasingly clear that the mix of crested wheatgrass with cheatgrass in severely grazed interspaces promotes extremely rapid fire spread. For example, in 2010 in the northern Jarbidge, in the area of portions of the Proposed Route segment 9 and alternate, the Long Butte fire burned across nearly 300,000 acres mostly in the course of two days – and 90% or more of the area was crested wheatgrass and various seedings on top of seedings – at times with abundant cheatgrass. BLM refuses to remove crested wheatgrass, as it is used by range staff to claim limited use by livestock. It is largely unpalatable so livestock eat the small native Poa and other grasses, and severely degrade interspaces resulting in blankets of cheatgrass between coarse tall grass. This sets up a disastrous wildfire scenario.	The risk of project-related fire is addressed in the Sections 3.10 and 3.22 of the FEIS. Mitigation measures to reduce the risk are included.
100814	KATIE FITE	WESTERN WATERSHEDS	We understand that lek surveys and other more detailed biological studies are being conducted for the Hemingway to Boardman line – but not Gateway.	Lek surveys were conducted for the Hemingway to Boardman line. Surveys are required prior to construction for Gateway West.
100814	KATIE FITE	WESTERN WATERSHEDS	The consideration of biological information is so poor that the Important Bird Areas of the South Hills and the important Ferruginous hawk areas and their surroundings are not even shown.	Important Bird Areas, including South Hills, are discussed in Sections 3.10.1.5 and 3.10.2.2. See Table 3.10-5 for a listing of IBAs and miles crossed by each segment and alternative. The EIS covers approximately 3,000 miles of proposed and alternative routes that were studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have identified different preferred routes. Therefore, the maps are complex by nature. Several people commenting on the DEIS requested more detailed maps, e.g., maps that showed individual private parcels. The Project Web site added a link to maps at that scale. Also, we revised many of the maps in the FEIS and added some new maps.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS is greatly deficient in providing detailed information the location and current condition of all springs, seeps and other waters impacted by any part of the Gateway project. These are critical for migratory birds, sage-grouse brood rating, and many other wildlife needs, as well as highly valued by recreationalists. Yet many have been severely degraded by livestock grazing, de-watering/reduced flows due to harmful “development” for livestock, and many other purposes. In addition, roading almost always accompanies development, and adds to impacts. Now we are faced with Idaho Power considering a series of	Effects to water resources are discussed by segment and alternative in Section 3.16.2.3. Identifying the location of all springs and seeps along thousands of miles of routes is beyond the scope of this analysis. Surveys to identify these features will be required for the selected route prior to construction and the EIS includes measures to protect these features (including WET-1, WET-2, WET-3, WET-4).

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			southern routes in wild lands where any additional stresses to waters will very significantly add to stress on systems. At times agencies have built band-aid exclosures – leaving any unfenced wet area as a sacrificed to extreme levels of livestock use. There is greatly inadequate information on the current ecological health, flows, etc. of all riparian areas, as well as conditions of meadows. We Protest the EIS failure to provide detailed analysis of affected riparian areas, and minimize Gateway impacts on riparian systems, and hydrological connectivity in watersheds.	
100814	KATIE FITE	WESTERN WATERSHEDS	Federal agencies have spent vast sums of taxpayer dollars destroying woody vegetation to produce livestock forage, or to “treat” it often under false claims that fire risk might be reduced. All such areas must be identified. Large wildfires have burned vast areas of the sagebrush and pinyon-juniper landscapes, including the 2012 Holloway and Long Draw fires, with long Draw impacting a very significant area for the Northern Great Basin GSG population. Exotic forage grasses and the weedy forage kochia have been seeded in many areas – with adverse impacts to sage-grouse, migratory birds and many other wildlife. All of this disturbance must be mapped, analyzed, and impacts assessed as part of the baseline of this process. It is necessary to understand the relative scarcity of high quality native habitats, difficulties of rehab in any grazed landscape, and to understand how altered and fragmented many areas area. It is also necessary to highlight differences among alternatives.	<p>The adverse impacts due to grazing are discussed in Sections 3.10 and 3.11. Conducting a detailed analysis of grazing across a thousand miles of rangeland is beyond the scope of this EIS. The BLM is currently conducting an analysis of grazing levels under a 2011 court decision. Grazing is further discussed in Sections 3.17 and 3.18 of the FEIS. Cumulative impacts of grazing on various resources are discussed in Chapter 4, in multiple resource subsections of Section 4.4.</p> <p>Analyzing the long-term effects of grazing is beyond the scope of this analysis. Note that the BLM is currently re-evaluating grazing levels on 16 planning units in six western states.</p>
100814	KATIE FITE	WESTERN WATERSHEDS	Exotic forage grasses and the weedy forage kochia have been seeded in many areas – with adverse impacts to sage-grouse, migratory birds and many other wildlife. All of this disturbance must be mapped, analyzed, and impacts assessed as part of the baseline of this process. It is necessary to understand the relative scarcity of high quality native habitats, difficulties of rehab in any grazed landscape, and to understand how altered and fragmented many areas area. It is also necessary to highlight differences among alternatives. It is also necessary to understand how often greatly overstocked lands were. AUMs in many of the older LUPS - and even continuing to this day – were based on fantasy levels, ad these have never been cut. We Protest the failure to provide this analysis, and the failure to prohibit use of non-native species in any rehab actions related to Gateway.	The FEIS does require the use of seed mixes approved by the applicable land management agency for each area (WEED-1). The BLM does not have the authority to require mitigation on private lands. To date, the Proponents have agreed to apply WEED-1 on all lands in Wyoming, and all lands in Idaho along Segments 6, 8, and 9. Mapping the extent of all weed areas across the 3,000 miles of proposed and alternative routes is beyond the scope of a project-level analysis.
100814	KATIE FITE	WESTERN WATERSHEDS	All current and adequate rangeland health information for all affected lands must be provided.	Assessing the health of all range lands across the 3,000 miles of proposed and alternative routes is beyond the scope of a project-level analysis.
100814	KATIE FITE	WESTERN WATERSHEDS	All CRP land must be mapped, and impacts of any “emergency” or other grazing or disturbance must be provided.	The federal government is prohibited by law from providing the location of CRP lands.

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100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the continued lack of adequate grazing information.	The adverse impacts due to grazing are discussed in Sections 3.10 and 3.11. Conducting a detailed analysis of grazing across a thousand miles of rangeland is beyond the scope of this EIS. The BLM is currently conducting an analysis of grazing levels under a 2011 court decision. Grazing is further discussed in Sections 3.17 and 3.18 of the FEIS. Cumulative impacts of grazing on various resources are discussed in Chapter 4, in multiple resource subsections of Section 4.4.
100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the failure to analyze the impacts of pioneering new routes for energy sprawl.	The CEQ regulation Sec. 1508.25 states the following: “....Actions are connected if they: (i) Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification.” As discussed in Chapter 1, the Gateway West Project is needed to upgrade the capacity and reliability of the existing grid. We considered reasonably foreseeable energy development projects (see Section 4.2.2.5) but did not identify any new power development projects that are dependent on the Gateway West Transmission Line Project or that the Gateway West Project is dependent upon. While it is logical to assume that a wind project would trigger construction of a new transmission line to connect it with the grid, it does not follow that the Gateway West Project will trigger any specific new wind project. Gateway West is one of several new transmission lines being planned, any of which could transport new coal, wind, or solar energy. Power is likely to come from a many sources, both existing and new, but the Project is not dependent on any specific new sources. Therefore, new power generation is considered a cumulative effect, not a connected action. Section 4.2.2.5 discusses proposed new energy facilities and discloses the possible cumulative effects.
100814	KATIE FITE	WESTERN WATERSHEDS	All Transmission, Roothing, Fencing, Water Developments, Veg Conditions, Etc. Must Be Overlaid. Detailed overlaying of information is necessary to understand the landscape and environmental context – and severity of impacts – of any route segment on sensitive species, wild lands, etc. Much of the mapping does not have much of the existing infrastructure shown – so the degree of fragmentation and development cannot be understood. We Protest the lack of information in the FEIS.	The EIS covers approximately 3,000 miles of proposed and alternative routes that were studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have identified different preferred routes. Therefore, the maps are complex by nature. Several people commenting on the DEIS requested more detailed maps, e.g., maps that showed individual private parcels. The Project Web site added a link to maps at that scale. Also, we revised many of the maps in the FEIS and added some new maps. Maps related to cumulative effects, including existing and proposed infrastructure are provided in Appendix E. The Trails Report discusses known dirt roads and trails. More detailed mapping and GIS analyses are available on request.

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100814	KATIE FITE	WESTERN WATERSHEDS	Slickspot Peppergrass and other Rare Plants and Other Concerns Portions of the route north of the Snake River would affect slickspot peppergrass. Since access route and new and expanded roading maps have not been provided, it is impossible to understand the degree and severity of impacts – which are likely to be very significant. New and expanded weeds, increased wildfire risk, and many other threats and adverse impacts are likely. Construction of the line and roading will result in additional altered hydrology, small depressions, ruts – and puddles. Puddles that collect water increase livestock concentration and adverse impacts – especially the very harmful trampling impacts. Detailed plans must be provided, and the full degree of impacts examined. We note that altered hydrological processes will also create additional sites for West Nile virus, especially when combined with cattle troughs, stock ponds, and other West Nile mosquito breeding areas.	Effects to slickspot peppergrass are discussed in Section 3.7. The BLM has included this species in the BA. Note that the Preferred Route generally avoids impacts to this species. Refer to the requirement in the USFWS Biological Opinion attached to the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	Both the baseline and expanded impacts and threats to migratory birds, sage- grouse, and recreational users must be examined here. We Protest the lack of necessary information and mitigation.	<p>The analysis of wildlife species (Sections 3.10 and 3.11) and recreation (Section 3.17 - Land Use) is in compliance with NEPA, ESA, BLM, and Forest Service requirements, and has been reviewed by applicable agencies. Edits requested by these agencies have been incorporated into the FEIS. Cataloging all past activities and current uses for so vast an area is beyond the scope of this analysis. Additional information on the sage-grouse HEA model was presented to the public and comments were accepted and considered in developing the FEIS.</p> <p>18000: Inadequate Reclamation/ Inadequate Mitigation The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMs) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance Management Plan, a Framework Plan for Restoration, a Framework Noxious weed plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans.</p>
100814	KATIE FITE	WESTERN WATERSHEDS	The Appendices C-1, C-2 and C-3 are greatly inadequate to protect and mitigate Gateway impacts to historic properties (C-1), the compensatory mitigation and for monitoring of waters of the US is still draft and inadequate to protect the stressed waters in this very arid region that also suffers chronic livestock grazing, irrigation withdrawals, aquifer depletion, grazing caused sedimentation and manure pollution,	The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMs) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance

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			agricultural runoff, etc. C3 is sage-grouse mitigation and other wildlife mitigation and is plagued with the same problems we have already described. There is little avoidance, minimal minimization and greatly inadequate and uncertain mitigation effectiveness. This package will not adequately conserve, enhance and restore sage-grouse and the habitats upon which they rely. A collaborative committee does not ensure sound mitigation. There is no requirement that the mitigation occur in the same local population area – only the same state. There is no analysis of the effectiveness of the actions.	Management Plan, a Framework Plan for Restoration, a Framework Noxious Weed Plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans. Appendix N includes the PA for complying with the Historic Preservation Act. These plans have been revised and included in the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	Please review WWP's comments on sage-grouse mitigation, which we incorporate by reference into this Protest.	This comment is noted. Please refer to the BLM's response to your protest letter (Appendix K to the ROD).
100814	KATIE FITE	WESTERN WATERSHEDS	The mapping of routes is cluttered and difficult to understand. On Maps such as E.2.4, it is often impossible to understand where existing transmission lines run as there is overlap between old and new lines, it appears. These must be overlaid. In several of the maps, it is impossible to understand where the WVEC runs.	The EIS covers approximately 3,000 miles of proposed and alternative routes that were studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have identified different preferred routes. Therefore, the maps are complex. We apologize for difficulty in reading some of the maps. Reviewing associated tables, in conjunction with the maps can help clarify certain issues. As the project follows the WVE corridor in many locations, it was difficult to overlay the two corridors without grossly exaggerating locations at the map's scale.
100814	KATIE FITE	WESTERN WATERSHEDS	Portions of the Proposed Route in Wyoming come much too close to VRM II and I areas, and strongly conflicts with those designations. We also stress that the reason there are VRM II areas is that modern land use plans are in place- in contrast to the tear it all up VRM categories common under older RMPs and MFPs. As part of this analysis, for all potential routes – a modern day consideration of VRM must occur, and any RMP amendments undertaken must upgrade VRM protections to VRM II or I for all intact native vegetation habitats and important wild land areas.	The Project conformance analysis was required to address existing approved Land Use Plans. VRM restrictions apply to the land designated as such and not adjacent areas. Your comments regarding specific amendment protests are addressed in the BLM's response to the protests filed on this project (Appendix K to the ROD).
100814	KATIE FITE	WESTERN WATERSHEDS	Mapping appears to show the Westwide Energy Corridor. WHY can't Gateway follow this, existing torn up areas and power/energy lines, and the interstate? There is no alternative that effectively does this, and it must be considered.	Refer to Sections 2.2.1 and 2.4.13 (including Table 2.4-3) for a discussion of the Project's use of designated corridors.
100814	KATIE FITE	WESTERN WATERSHEDS	There have not been sufficient alternative routes that follow existing lines considered. Two Gateway lines can parallel each other - separated by a certain "safe" distance, including building a second line if a second line is actually needed) that parallels the energized existing line, and two parallel lines otherwise follows the disturbed lands and other developed areas. It appears that the claim that in a certain part, two lines are needed is really about opening up a huge swath of sensitive less developed country to all manner of development.	Refer to Section 2.2 of Chapter 2 for a discussion of alternative development. Alternatives include numerous route alternatives identified by the BLM and Forest Service, as well as by the county and state governments and local task forces. Placing the lines underground is discussed in Section 2.6.3.1. High-voltage direct current lines are discussed in Section 2.6.3.4. Not building a new transmission line is discussed under No Action (Section 2.3). Alternatives eliminated from detailed study are discussed in Section 2.4.12. The purpose and need for the project, as well as the Proponents'

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				need to meet capacity and reliability requirements, is included in Chapter 1. Section 1.2 includes the federal agencies' purpose and need. Section 1.3.1 includes the Proponents' objectives. Sections 1.3.2 and 1.3.2 discuss federal and state oversight and regulation, respectively. Sections 1.3.4 and 1.3.5 discuss demand, capacity, and reliability.
100814	KATIE FITE	WESTERN WATERSHEDS	Even using reading glasses, it is hard to distinguish the letters that are associated with parts of routes on mapping. We appreciate the big maps, but more clarity is required.	The EIS covers approximately 3,000 miles of proposed and alternative routes that were studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have identified different preferred routes. Therefore, the maps are complex by nature. Several people commenting on the DEIS requested more detailed maps, e.g., maps that showed individual private parcels. The Project Web site added a link to maps at that scale. Also, we revised many of the maps in the FEIS and added some new maps. The maps required a compromise between font size and information. We are sorry you found them difficult to read.
100814	KATIE FITE	WESTERN WATERSHEDS	Deep Creek - 7A is described as: "requested by BLM to examine ... alternatives on public and private land that did not impact the Deep Creek Mountains. Yet this route - as shown on mapping - still slices across the Range, instead of following the "other route" - gray line on Map Figure E 3.8. This route should be moved further north, and out of the Deep Creek range entirely. It should follow the existing line to the north as much as possible. Gateway must follow existing lines to the north, and stay out of the Deep Creek range and sensitive Sublette and other areas.	The gray lines on Figure E.3-8 are the routes considered for Segment 5, not for Segment 7. It appears that this comment is for Segment 5.
100814	KATIE FITE	WESTERN WATERSHEDS	To what degree would any new line here facilitate further large-scale industrial wind development? What would the serious adverse impacts on sage-grouse, sharp-tailed grouse, pygmy rabbit, migratory birds be?	Cumulative effects from existing power generating sources are discussed in Section 4.1 and effects from foreseeable generating developments, including proposed transmission facilities, are discussed in Section 4.2 of the EIS. The cumulative effects of these projects on listed species are also discussed in the Biological Assessment (Appendix M of the FEIS).
100814	KATIE FITE	WESTERN WATERSHEDS	In Segment 6 (and elsewhere) mapping of routes overlaps, and it is impossible to discern what is occurring, see Figure E-3.7. There is no need for a southern route, and degradation of salmon Falls Canyon, rare bat and migratory bird and eagle habitats in unacceptable. In fact, the mailer about Gateway that was sent out does not seem to show what the FEIS mapping is showing.	<p>The EIS covers approximately 3,000 miles of proposed and alternative routes that were studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have identified different preferred routes. Therefore, the maps are complex by nature. Several people commenting on the DEIS requested more detailed maps, e.g., maps that showed individual private parcels. The Project Web site added a link to maps at that scale.</p> <p>The purpose and need for the Project, as well as the Proponents' need to meet capacity and reliability requirements, is included in</p>

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				Chapter 1. Section 1.2 includes the federal agencies' purpose and need. Section 1.3.1 includes the Proponents' objectives. Sections 1.3.2 and 1.3.2 discuss federal and state oversight and regulation, respectively. Sections 1.3.4 and 1.3.5 discuss demand, capacity, and reliability.
100814	KATIE FITE	WESTERN WATERSHEDS	We strongly oppose 9E. OHV use is already out of control (despite BLM efforts at "Travel Planning"). Any further south powerline disturbance in the Owyhees will add greatly to the uncontrollable habitat disturbance and alteration. We oppose all segment outing in western Twin Falls County (Jarbidge BLM) and Owyhee County.	Your opposition to Alternative 9E is noted. Mitigation measures that address potential OHV or any unauthorized vehicle use of the ROW are included in Table 2.7-1.
100814	KATIE FITE	WESTERN WATERSHEDS	The line will increase wild fire risk. The DEIS is greatly deficient in analyzing impacts to a host of sensitive species. Sage-grouse are not a surrogate for sage sparrow, loggerhead shrike, Mojave collared lizard, and other lower elevation Wyoming big sagebrush species, including those that occur at interfaces with salt desert shrub.	Surveys conducted for the EIS and the agencies' determination as to the extent and need for surveys is discussed in the "Biological Field Surveys" portion of 3.11. Baseline information is provided in the "Affected Environment" section. Species are lumped when the habitat requirements and life history traits would result in an identical or redundant assessment. The risk of project-related fire is addressed in the EIS. Sage-grouse are not used as a surrogate for any species discussed in this EIS. Potential impacts of the Project are addressed in the EIS.
100814	KATIE FITE	WESTERN WATERSHEDS	Here too we request that only routes NORTH of the Snake River be considered, with a crossing near Melba to Hemingway. Why can't there be two new parallel lines set up along the path of the existing lines to the north, and no southern route at all? Separate the lines by whatever distance is necessary (please provide a specific distance and describe why separation is necessary)– but co-locate all new lines in the same area as the bulk of existing lines to the maximum extent possible. We fear that the claim that a split and two new routes are needed in places is "cover" for opening up Rockland Valley Cedar Ridge area, the South Hills, northeastern Nevada, portions of the Jarbidge lands to extensive new development. We Protest this.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The purpose and need for the Project, as well as the Proponents' need to meet capacity and reliability requirements, is included in Chapter 1. Section 1.2 includes the federal agencies' purpose and need. Section 1.3.1 includes the Proponents' objectives. Sections 1.3.2 and 1.3.2 discuss federal and state oversight and regulation, respectively. Sections 1.3.4 and 1.3.5 discuss demand, capacity, and reliability.
100814	KATIE FITE	WESTERN WATERSHEDS	High voltage lines produce a very audible crackling noise, which at times is quite loud. How do different weather conditions, voltage loads, etc. - effect this as well as EMF and other hazards?	The electrical environment in analyzed in section 3.21. Noise is analyzed in Sections 3.21 and 3.23 and health in section 3.22.
100814	KATIE FITE	WESTERN WATERSHEDS	This may interfere with animal communication and behavior in various ways, and is annoying to people. What species given their known hearing and communication systems, may be particularly vulnerable?	The electrical environment in analyzed in section 3.21. Noise is analyzed in Sections 3.21 and 3.23 and health in section 3.22.
100814	KATIE FITE	WESTERN WATERSHEDS	"Stray voltage" refers to a phenomenon in wet environments. Recreationists, scientists or others may be near the line under such conditions, in vehicles or hiking on foot. What hazards does this pose – as hikers can't be grounded – and cars can't either. It is difficult to understand what the effects would be from this material.	As stated in the FEIS, Section 3.21.1.4, "transmission lines such as the one proposed are not normally associated with the phenomenon of stray voltage..." The EIS agrees that stray voltage and electric shocks can cause problems under certain circumstances. Dairy farmers report problems with voltage jumping to pumps and other electrical equipment. These issues are discussed in Section 3.21. The nation's roads and trails include

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				thousands (if not millions) of crossing points under transmission lines. We are not aware of any adverse impacts to people driving or hiking under the lines, based on the literature we reviewed.
100814	KATIE FITE	WESTERN WATERSHEDS	Both the human health and the animal adverse impacts have not been analyzed.	Electromagnetic fields and their effects are discussed in Section 3.21 of the FEIS. Hazards such as environmental contamination, electrocution, and fire are addressed in Section 3.22. Additional concerns regarding human and animal safety in agriculture are discussed in Section 3.18 of the FEIS.
100814	KATIE FITE	WESTERN WATERSHEDS	The fire prevention measures are inadequate. No construction activities (blasting, motorized equipment use) should be allowed during periods of “High” fire danger on public lands. Idaho Power must be responsible for paying for the full costs of any fires linked in any way to this line over its entire period of construction and operation. Lands must be rehabbed with local native ecotypes, and grazing removed until recovery of all components occurs.	Fire is a concern, as the FEIS states. A fire prevention and suppression plan approved by the applicable agencies is required (See POD attached to the ROD). Fire risk is discussed in Section 3.22 of the FEIS; fire effects on wildlife are discussed in Sections 3.10 and 3.11.
100814	KATIE FITE	WESTERN WATERSHEDS	How much blasting is proposed, and where – for all segments of the line and access roads? Until full and detailed surveys in the noise Footprint of the line are conducted and detailed plans for this line produced, it will be impossible to understand impacts.	Prior to construction of the Project a blasting plan will be produced to comply with all federal, state and local regulations, which will ensure compliance.
100814	KATIE FITE	WESTERN WATERSHEDS	There is inadequate analysis of impacts of construction and operation.	Chapter 3 of the EIS describes the existing condition for vegetation, wildlife habitat, and other resources. Additional information on habitat was added to the FEIS in response to comments and suggestion following publication of the DEIS. Cataloging all past activities and current uses for so vast an area is beyond the scope of this analysis. Additional information on the sage-grouse HEA model was presented to the public and comments were accepted and considered in developing the FEIS. Addition information on cumulative effects has been included in the FEIS. The wildlife sections (3.10 and 3.11) were prepared to meet requirements of NEPA, the Endangered Species Act, Forest Service and BLM special status species policy and other policies, and other applicable laws and statutes. Although detailed data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	No guy wires should be allowed. They pose a collision risk for bats and avian species, as well as public safety concerns. The EIS describes 4 guy wires each 140 feet long spaced in a square around each tower. 3.22-13. This again highlights the need for detailed study of migratory bird use and movement patterns including migration routes across the footprint of the line. We Protest the use of these lethal guy wires.	The use of guy wires and the effects are analyzed in Section 3.22.2.5 on page 3.22-13. Mitigation measures have been developed to limit the use of guy wires on federal lands; however, the BLM does not have the authority to require this on private or state lands (see Table 2.7-1). The EPM WILD-7 states: “Guy wires will be marked with bird deterrent devices on federal lands to avoid avian collisions with structures, as directed by local land manager.”

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100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the entire cumulative effects analysis, as described below. It is greatly inadequate for all rare, sensitive, and ESA-listed species, for roadless lands, for impacts on cultural and historic properties, and other values of the public lands.	As required by NEPA, the FEIS includes an analysis of cumulative effects from past, present, and reasonably foreseeable future projects. The FEIS discloses direct and indirect effects in Chapter 3 and cumulative effects in Chapter 4. We believe that the analysis documented in the FEIS is sufficient for a reasoned decision.
100814	KATIE FITE	WESTERN WATERSHEDS	The entire cumulative effects analysis is greatly flawed. The EIS attempts to use a Table with a list of some projects listed to avoid full and detailed cumulative impacts analysis. It is impossible cumulative effects as there has been no adequate baseline.	Although detailed baseline data are not available for all areas for all cumulative impacts, the FEIS includes sufficient data for decision-makers to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	The Table also omits many harmful activities occurring chronically in the Footprint of the line – like chronic livestock grazing disturbance.	Chapter 4 (Cumulative Effects) presents multiple tables of various known existing and proposed projects and infrastructure within the analysis area. In addition, discussions of various concurrent impacts are provided, including effects from grazing (such as 4.2.1.6, 4.4.7, 4.4.9, 4.4.10, 4.4.11, 4.4.12, 4.4.16, 4.4.17, and 4.4.19).
100814	KATIE FITE	WESTERN WATERSHEDS	For example, the section on migratory birds and raptors (Section 4.4.11.3) claims that “effects of gateway could occur primarily during construction”. Yes, the construction impacts may be severe – but the effects of the line - combined with chronic grazing disturbance, energy disturbances, roading, etc. will play out over the life of the line. AND the line will be a long-term lethal collision hazard causing death of migratory birds.	The discussion of cumulative effects on migratory birds and raptors discusses mortality from collision and electrocution as well as cumulative effects on prey base and habitat fragmentation. The cumulative impact of existing and future habitat degradation due to other activities, including grazing, is considered to be substantial.
100814	KATIE FITE	WESTERN WATERSHEDS	The Columbian sharp-tailed grouse, sage-grouse and all imperiled species cumulative effects analyses are a joke – and no valid conclusions are drawn.	Your opinion of the analysis for sharp-tailed grouse, sage-grouse and all imperiled species is noted. The FEIS includes a very detailed analysis of the effects on special status species in Section 3.11, the HEA, the BA, as well as the Forest Service BEs.
100814	KATIE FITE	WESTERN WATERSHEDS	We Protest the failure to critically examine the colossal impact of the Gateway routes in pioneering huge new corridors.	Chapter 3 of the FEIS analyzes direct and indirect effects. Chapter 4 of the FEIS examines the cumulative effects of the Gateway West Transmission Line. The analysis is over 4,000 pages. Sufficient data are presented to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	Now in 2013, watersheds, sage-grouse and other sagebrush wildlife are currently under siege. Solid baseline information must be acquired, best available science applied, and route segments with significant conflicts abandoned. Otherwise, Idaho Power's Gateway Project may be a very significant factor in extirpation of affected sage-grouse, Columbian	The HEA presented in the FEIS is a science-based, peer-reviewed analysis which identifies compensatory mitigation requirements to potential Project-related effects, measured as a loss of habitat services from pre-disturbance conditions. It has been used by multiple federal agencies to assess project-related impacts and

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			sharp-tailed grouse, and other wildlife populations. This EIS does not give Priority to sage-grouse and other sensitive species or values of the public lands.	mitigation requirements for other projects in the U.S. within recent years. The HEA used for this project incorporated best available science, and was reviewed by an interagency committee of biologists, which included the BLM, state wildlife agencies, as well as the USFWS.
100814	KATIE FITE	WESTERN WATERSHEDS	Jarbridge RMP 11. Cultural resources. This incompatible use should not be allowed in this historic trail area.	Your protest is noted. Refer to the BLM's response to the protests filed on this project (Appendix K to the ROD).
100814	KATIE FITE	WESTERN WATERSHEDS	Jarbridge RMP 10. Visual or scenic values of the public lands. These RMP protections must be retained. The damaging, intrusive high voltage powerline and jarring visual and other disturbances must be prohibited. This also will help to protect the important wildlife resources, including diminishing populations of migratory birds and rare bats. Impacts cannot be mitigated sufficiently. The areas must be avoided.	Your protest is noted. Refer to the BLM's response to the protests filed on this project (Appendix K to the ROD).
100814	KATIE FITE	WESTERN WATERSHEDS	Jarbridge RMP 9. Salmon Falls Creek Canyon. This is an ACEC, and an increasingly important area as the population of southern Idaho continues to grow, and the Gateway project should not be allowed to mar and destroy this wild land setting. It also poses a significant hazard to migratory birds, rare bats, and other wildlife that inhabit this lovely canyon. Impacts cannot be mitigated. The area must be avoided. Here, as throughout the EIS and its routes, necessary site-specific information on rare bats, migratory birds and other sensitive biota has not been collected and analyzed so impacts simply cannot be properly assessed and mitigated. A Supplemental EIS is required to analyze the relative scarcity of little-disturbed habitats in this landscape.	Your protest is noted. Refer to the BLM's response to the protests filed on this project(Appendix K to the ROD).
100814	KATIE FITE	WESTERN WATERSHEDS	Morley Nelson SRBOPA. This area is tragically mis-managed by BLM, and unfortunately this route is less damaging than the routes to the south.	Your statement on management and preference for a route going through the SRBOP are noted.
100814	KATIE FITE	WESTERN WATERSHEDS	Jarbridge RMP 13. Visual or scenic value protection and prohibition on alteration of the natural landscape. The visual standards help protect habitats for sensitive species, as well as recreational use and enjoyment.	Your comment that visual standards help protect habitats for sensitive species, as well as recreational use and enjoyment, is noted. The FEIS concurs with this.
100814	KATIE FITE	WESTERN WATERSHEDS	Utility avoidance/restriction area. This protection must be upheld.	Your comment that utility avoidance/restriction area must be upheld is noted. See Appendix F for a discussion of this issue.
100814	KATIE FITE	WESTERN WATERSHEDS	W strongly oppose allowing the Gateway project to destroy the visual setting, wildlife habitats, and other values of the ACEC and public wild lands. Gateway must be required to follow existing corridors/line routes located to the north of this area, and be bundled there.	Alternatives 9B and 9C follow the eastern edge of the canyon north. These routes cross irrigated farmland. 9C would impact Balanced Rock State Park. Alternative 9B crossed many miles of irrigated farmland as well as passing over residences.
100814	KATIE FITE	WESTERN WATERSHEDS	Rock Creek/Tunp 37014. The Gateway West EIS conflicts with wildlife and other resource needs and cannot be mitigated in this area, and the area must be avoided. Monitoring is no basis for allowing a route, and mitigation is vague and inadequate to protect natural resources from this huge powerline's damage to animal habitats and populations.	Your comment is noted. See Section 2.4.1.1 for the reason why the Preferred Route was selected.
100814	KATIE FITE	WESTERN WATERSHEDS	The Gateway EIS should not be allowed outside the existing corridors.	Refer to Sections 2.2.1 and 2.4.13 (including Table 2.4-3) for a discussion of the Project's use of designated corridors.

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100814	KATIE FITE	WESTERN WATERSHEDS	Micro-siting and mitigation measures will be greatly in adequate to protect the resources.	The FEIS includes numerous avoidance, minimization, and mitigation measures (referred to as EPMs) that set standards for reclamation. In addition, Appendix B to the FEIS includes the Plan of Development (POD). The POD includes several appendices which outline the restoration efforts proposed by the Proponents. These include an Environmental Compliance Management Plan, a Framework Plan for Restoration, a Framework Noxious weed plan, and several other framework plans. These have been revised and updated and are attached to the ROD. In many cases, comments received on the EIS were used to revise the EPMs between Draft and Final EIS, and between the FEIS and the ROD. In addition, Appendix C to the FEIS includes Proposed Mitigation Plans. Appendix N includes the PA for complying with the Historic Preservation Act. These plans have been revised and included in the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	We are greatly concerned about the potential avian and bat mortality due to collisions with the lines and/or guy wires, fencing, etc. ALL wires should be prominently marked with reflective or other highly visible material.	Effects on migratory birds are assessed in Section 3.10. Additional information on special status birds is included in Section 3.11. The EIS acknowledges that bird and bat collisions may occur.
100814	KATIE FITE	WESTERN WATERSHEDS	We are very concerned about the EIS punting to “micro-siting”. This appears to be yet another segmentation strategy of a sort. It hides the exact path of the line from public review until after the ink is dry in the ROD. Full analysis necessary to understand how intrusive the line will be – and if mitigation by avoidance is necessary – cannot be undertaken if the exact path remains a mystery until the bulldozers roar to blade roads in to build this huge project. The purpose of the EIS is to conduct an analysis so that necessary actions can be taken, and proper mitigation applied – including mitigation by avoidance of choosing a different path entirely or not building the project, or other actions. Putting off hard choices to last minute micro-siting thwarts NEPA’s hard look requirement, and violates FLPMA’s protections for public lands resources, as well.	Exact locations for the transmission line, roads, and other facilities will be developed during the detailed design phase once a route is approved. It would not be practicable to complete a full design on all 3,000 miles of proposed and alternative routes. Even after this design is completed, micro-siting will likely result in additional changes to the route and roads as additional surveys for plants, wildlife, cultural, and paleontological resources are completed. Therefore, a preliminary design was used to provide indicative locations for towers, roads, and laydown yards along all routes. These indicative locations have been used in geographic information system (GIS) analysis to develop the “disturbance footprint” of the Project. This disturbance footprint was used to identify the likely resource impacts of the project at a level sufficient level to meet NEPA requirements.
100814	KATIE FITE	WESTERN WATERSHEDS	The Gateway EIS greatly fails to benefit heritage resources and will destroy and degrade them.	Both the BLM and Forest Service have handbooks (Visual Resource Management) that aid us in analyzing landscapes and the degree of change a project may have on the existing landscape. In that section regarding visual resources, several Key Observation Points were utilized that were not attached to historic trails, TCPs, or historic districts. Those KOPs assisted in analyzing the changes in the landscape that may occur as a result of the preferred route and alternatives regardless of whether or not these landscapes are eligible cultural properties or culturally significant properties that may not meet the NRHP criteria for significance. Those KOPs were identified through public outreach efforts/scoping for the project. We do not have all of the information ahead of the EIS to

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				determine every effect to National Register of Historic Places eligible properties including landscapes because we do not have 100% on-the-ground coverage. We have therefore spent the last four years developing a Programmatic Agreement which addresses how effects to historic properties (which includes significant cultural landscapes) will be avoided, minimized, or mitigated in consultation with interested parties including special interest groups, tribes, and landowners. Tied to this Programmatic Agreement are on-the-ground cultural resource inventories that will identify cultural landscapes prior to the Notice to Proceed for project construction.
100814	KATIE FITE	WESTERN WATERSHEDS	On no part of the route is the full degree of visual and aesthetic intrusion adequately analyzed or mitigated.	Section 3.2 of the EIS analyses the potential effects to landscapes that are generally referred to as "Visual Resources". The BLM uses the National Landscape Conservation System to protect landscapes for not only scenic quality but also for cultural resources on public lands. Both the BLM and USFS have handbooks (Visual Resource Management) that aid us in analyzing landscapes and the degree of change a project may have on the existing landscape. In that section regarding visual resources, several Key Observation Points were utilized that were not attached to historic trails, TCPs, or historic districts. Those KOPs assisted in analyzing the changes in the landscape that may occur as a result of the preferred route and alternatives.
100814	KATIE FITE	WESTERN WATERSHEDS	The EIS process provides no adequate basis for understanding the baseline ecological conditions, and degree and severity of habitat degradation that exists along all potential routes, and how it will impact sensitive, MIS, and T&E species.	Chapter 3 of the EIS describes the existing condition for vegetation, wildlife habitat, and other resources. Additional information on habitat was added to the FEIS in response to comments and suggestion following publication of the DEIS. Cataloging all past activities and current uses for so vast an area is beyond the scope of this analysis. Additional information on the sage-grouse HEA model was presented to the public and comments were accepted and considered in developing the FEIS. Additional information on cumulative effects has been included in the FEIS. The wildlife sections (3.10 and 3.11) were prepared to meet requirements of NEPA, the Endangered Species Act, Forest Service and BLM special status species policy and other policies, and other applicable laws and statutes. The EIS discusses the risk of wildfire; however, developing a map with the fire history for Idaho, Wyoming, and parts of Nevada and Utah is outside of the scope of this document, as is providing an inventory of all fencing or a history of all grazing activity in this vast area. Managing grazing on lands crossed by the Project is beyond the scope of this analysis. RMPs, MFPs, and Forest Plans requirements on grazing would be followed.

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100814	KATIE FITE	WESTERN WATERSHEDS	The FEIS does not adequately examine the adverse cumulative impacts on sagebrush and other native ecosystems and native biota of a plethora of new corridors/lines/energy developments/disturbances.	The EIS provides a level of analysis needed to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed. Mitigation is included in the project; see the requirements attached to the ROD.
100814	KATIE FITE	WESTERN WATERSHEDS	We are concerned that the first sections of the EIS provide the reader with a wall of confusion that can be understood by only a power company insider. Many parts of the EIS are confusing. Information should be provided in a manner able to be understood by the public. Information that might contradict many of these sections must also be fully and fairly presented as well. Clearer mapping and detailed mapping of biological, cultural, scenic viewshed and other conflicts must also be provided. We Protest the failure to do this.	<p>Based on the many comments we received, the public generally understood the document and was able to provide meaningful comments. The EIS covers approximately 3,000 miles of proposed and alternative routes studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have different preferred routes. Therefore this document is complex by nature. We are sorry you found it difficult to understand.</p> <p>The EIS covers approximately 3,000 miles of proposed and alternative routes that were studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have identified different preferred routes. Therefore, the maps are complex by nature. Several people commenting on the DEIS requested more detailed maps, e.g., maps that showed individual private parcels. The Project Web site added a link to maps at that scale. Also, we revised many of the maps in the FEIS and added some new maps. Alternatives not considered in detail were removed from the Project maps (Appendix A) to reduce confusion. A separate set of maps was added showing these routes (Appendix O).</p>
100814	KATIE FITE	WESTERN WATERSHEDS	While all this time has been wasted considering very harmful routes, a route that maximizes paralleling existing lines, major roads, the disturbed land areas of WWEC segments, and energizing Idaho and other Power company's existing lines, has not been fully developed and considered.	Refer to Section 2.2 of Chapter 2 for a discussion of alternative development. Alternatives include numerous route alternatives identified by the BLM and Forest Service, as well as by the county and state governments and local task forces. Placing the lines underground is discussed in Section 2.6.3.1. High-voltage direct current lines are discussed in Section 2.6.3.4. Not building a new transmission line is discussed under No Action (Section 2.3). Alternatives eliminated from detailed study are discussed in Section 2.4.12.
100814	KATIE FITE	WESTERN WATERSHEDS	BLM appears to have ginned up several alternatives that it is clear the agency would just not select. BLM should have denied consideration of many of the alternatives that punch through significant wild lands from the start - due to known serious sage-grouse, recreation and other conflicts.	Refer to Section 2.2 of Chapter 2 for a discussion of alternative development. Alternatives include numerous route alternatives identified by the BLM and Forest Service, as well as by the county and state governments and local task forces. Placing the lines underground is discussed in Section 2.6.3.1. High-voltage

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				direct current lines are discussed in Section 2.6.3.4. Not building a new transmission line is discussed under No Action (Section 2.3). Alternatives eliminated from detailed study are discussed in Section 2.4.12.
100814	KATIE FITE	WESTERN WATERSHEDS	It should have prepared a Supplemental EIS	Your request is noted.
100814	KATIE FITE	WESTERN WATERSHEDS	Bennett Hills/Timmerman Hills.15. It appears that the BLM is amending the RMP to allow outward sprawl development into a visually sensitive area. Instead of building the line to the north, it should be built to the south if no amendment would be necessary there. Kuna MFP. 16. The project should be confined to existing corridors.	Your protest is noted. Refer to the BLM's response to the protests filed on this project (Appendix K to the ROD). Refer to Sections 2.2.1 and 2.4.13 (including Table 2.4-3) for a discussion of the Project's use of designated corridors.
100814	KATIE FITE	WESTERN WATERSHEDS	Idaho Power has spun off a whole series of harmful alternatives – in portions of Wyoming that will facilitate large-scale wind development and other energy sprawl to a degree that is not adequately analyzed in the EIS;	The CEQ regulation Sec. 1508.25 states the following: “...Actions are connected if they: (i) Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification.” As discussed in Chapter 1, the Gateway West Project is needed to upgrade the capacity and reliability of the existing grid. We considered reasonably foreseeable energy development projects (see Section 4.2.2.5) but did not identify any new power development projects that are dependent on the Gateway West Transmission Line Project or that the Gateway West Project is dependent upon. While it is logical to assume that a wind project would trigger construction of a new transmission line to connect it with the grid, it does not follow that the Gateway West Project will trigger any specific new wind project. Gateway West is one of several new transmission lines being planned, any of which could transport new coal, wind, or solar energy. Power is likely to come from a many sources, both existing and new, but the Project is not dependent on any specific new sources. Therefore, new power generation is considered a cumulative effect, not a connected action. Section 4.2.2.5 discusses proposed new energy facilities and discloses the possible cumulative effects.
100814	KATIE FITE	WESTERN WATERSHEDS	The mapping in the EIS appendices is often unclear, and it also uses the same purple color to show the “Alternative Route not Studied in Detail” and WWEC segments – resulting in confusion and a viewer not able to clearly distinguish what is being depicted.	The EIS covers approximately 3,000 miles of proposed and alternative routes that were studied in detail (plus many more alternatives considered but not studied in detail). In addition, county and state governments, as well as federal land management agencies, have identified different preferred routes. Therefore, the maps are complex by nature. Several people commenting on the DEIS requested more detailed maps, e.g., maps that showed individual private parcels. The Project Web site added a link to maps at that scale. Also, we revised many of the maps in the FEIS and added some new maps. Alternatives not considered in detail

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				were removed from the Project maps (Appendix A) to reduce confusion. A separate set of maps was added showing these routes (Appendix O).
100814	KATIE FITE	WESTERN WATERSHEDS	In all of these Forest and BLM land Use Plans, the EIS fails to provide adequate baseline information on the current setting, and status (including relative scarcity) of the resource that will be stripped, altered, and/or destroyed by Gateway.	Although detailed baseline data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources. Although site-specific impacts may vary depending on final design and mitigation, the types and scale of impacts should be similar to those analyzed.
100814	KATIE FITE	WESTERN WATERSHEDS	Many of our concerns have not been addressed.	Substantive comments on the DEIS were addressed in the FEIS. See the comment response in Appendix L.
100814	KATIE FITE	WESTERN WATERSHEDS	Yet Idaho Power is not following the Corridor in many degraded areas so as to avoid sensitive areas. So what was the purpose of that whole exercise, anyway? We Protest Idaho Power's failure to follow established corridors, co-locate the project, increase capacity of existing lines, bundle lines where appropriate, bury lines in flat ag lands, and other common sense actions to conserve public lands and wildlife resources, as well as cultural, historical, recreational, wild land values, and protect quality of life for the region's residents, as well.	Refer to Sections 2.2.1 and 2.4.13 (including Table 2.4-3) for a discussion of the Project's use of designated corridors. Refer to Section 2.6.3 for a discussion of underground alternatives.
100814	KATIE FITE	WESTERN WATERSHEDS	Jarbridge RMP. 12. Visual and scenic values of the public lands must be protected, and that includes the > 5200 acres of VRM Class I lands, which includes the Salmon Falls ACEC and WSA.	Your protest is noted. Refer to the BLM's response to the protests filed on this project (Appendix K to the ROD).
100815	DALE GUST		I would strongly encourage the Route 8 which would run south of the current 345 KW lines.	Your preference for the Proposed Segment 8 routing is noted.
100815	DALE GUST		I write to oppose the Gateway West Route 8D. The Gateway West Route 8D would run right next to our property. We have 120 acres, 15 of which is farmed and planning to expand further next year. We are in the process of building a home within the next few months. We have 2 small children. The reason we chose to build and farm in this particular area was to raise our kids in a safe environment, free from health and safety concerns. Gateway West Route 8D would negatively impact our farming in the following ways. 1.) Our farm land is irrigated using surface flow, hand lines and wheel lines. Hand lines, center pivot, and wheel line irrigation would be almost impossible near the 500 KV transmission line. And according to the Occupational Safety Health Agency rules require farm workers to stay more than 100 feet of the lines. 2.) Many safety and health concerns have been observed near 500 KV Transmission lines. Operating machinery and equipment around transmission towers would be dangerous. Bonneville Power Administration suggests that maximum equipment height under a 500 kv transmission line should be no greater than 14 feet. Most farm equipment is taller than 14 feet and could put me, my family, and my workers in great harm. 3.) Operating irrigation equipment around	Effects on agriculture, including on center pivot irrigation systems, are discussed in Sections 3.4 and 3.18, as well as Appendix K. The analysis shows that lines that run along the edge of the fields have little effect on irrigation center pivot systems. Towers placed near the edge of the field have an impact, but far less than towers in the middle of the field. The independent agricultural specialist who completed the analysis in Appendix K found that a survey of five aerial applicators indicated that a buffer zone of up to 100 feet on each side of a power line is adequate for pilot safety (see page 10 of Appendix K to the FEIS under Soil Compaction). Effects on health are discussed in Sections 3.21 and 3.22.

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			towers and low hanging lines would be hazardous. Hand line pipes are 40 feet long and could easily run into a low hanging line that is 38 feet above ground. 4.) Aerial spraying would be impossible for several miles on both sides. Untreated areas become vectors for the spread of disease and could result in crop loss. 5.) OSHA sets limits on the distance farm workers must keep when working near high voltage electrical lines and can greatly impact our growing farm. 6.) It is also being researched and believed that low productivity in cattle is directly related to high voltage power lines as well as being linked to certain types of cancer.	
100817	JON KRESS, MELANIE KRESS		I am writing about the gateway west project through the Rockland, Idaho area. We have farmland, a home and land which we lease that will be affected by this project. We are NOT in favor of it! Land D257401, D254800, D255000, D255400, D257100, D252800, D253500, D253600, RP0104300, RP0109700, D288100	Your opposition to the Project is noted.
100817	JON KRESS, MELANIE KRESS		Land D257401, D254800, D255000, D255400, D257100, D252800, D253500, D253600, RP0104300, RP0109700, D288100 All of these areas have wildlife on them. The area east of our residence is a mule deer wintering habitat (Bull canyon, Cow canyon area). Deer, elk, moose, sage grouse, sharptail, partridge, pheasants, hawks, jack rabbits and many other animals will be affected by these transmission lines.	Effects on wildlife, including on winter habitat for deer, are discussed in Section 3.10. Specific effects at the parcels level are not included.
100817	JON KRESS, MELANIE KRESS		These lines will also affect the property value along with the beauty and tranquility of living in the country. We do not wish to see these lines through our front windows or back windows. Right now we have a very pleasant view which many visitors have commented on. Please do not go through this area.	Effects on scenery are analyzed in section 3.2, effects on property values in section 3.4.
100819	THERON BLAKE SOUTHWICK, JANA SOUTHWICK		Consider using and improving the existing road to the Power line construction site in Segment 4 in Idaho. Off the County Road from Sharon Idaho there is an existing Road (marking MaCarther-Southwick) that heads west over the hill thru a flat then to the top of the hill where the towers will be build – coordinates: (township T125 Range 43E Section 07) and access road from the southeast Quarter to the top of the hill where the towers are to be built. If these existing roads would be used and improved it would enable the landowners better access to their properties. In retrospect this may give us as landowners a better feeling of powerline project in our neighborhood. As roads have always been an issue in this area, there by helping improve and use these roads, since we can't change the course of the powerline, this may help alleviate some of the tension between landowners and the Gateway project. Thank you for your consideration.	This suggestion has been passed on to the Proponents. The BLM only makes decisions for federal lands.
100820	MATTHEW TEICHERT, TIMOTHY M TEICHERT	TEICHERT BROTHERS, LLC	Conservation Easement in Cokeville Kelly If you have any questions, please give me a call (307) 413-2519. Thanks for your help. [See PDF for Conservation Easement descriptions and WRP Warranty Deed]	This information has been forwarded to the Proponents. The BLM only makes decisions on the ROW on federal lands; however, it has participated in discussions with stakeholders in the Cokeville area and considered alternatives to the preferred route. Refer to the report attached to the ROD..

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100823	KEVIN LARSON		live in Burley, ID and have for the length of my life at 57 years. I am writing you about the Gateway West Power Line. I am in favor of the route the BLM and the power company wants to use. which is route 7 through Cassia County. I want to thank all the people involved and for keeping this project off public lands. The attitude that a lot of people have toward our wildlife and our use of public land is the perfect example of why we need the ESA. These lands are everyone's not just Cassia County of the state of Idaho. I am glad it is owned by the federal government, so we can have proper management and conservation.	Your support for the BLM's Preferred Route along Segment 7 is noted.
100824	MICHAEL CHEN, C DALE WILLIS JR	SNAKE RIVER RANCH, LLC	The purpose of this correspondence is to convey my displeasure, disappointment, and anger which is related to the Bureau of Land Management (BLM) Proposed Alternative with Segment 8B of the Gateway West Transmission Line Project. My partners and I own in excess of 1,000 acres of productive farm and cattle ranch land which is located along the Snake River, just west of Melba, ID (see enclosed picture/map). Since January, 2009 we have worked very closely with other property owners, governmental officials, BLM & Idaho Power (IP) officials, so that a satisfactory solution could be achieved. After many months of private and public meetings on the issue of routing of the transmission lines; a compromise was achieved by locating the Preferred Route through the Morley Nelson Birds of Prey (NCA). It was and has been shown on the Gateway West Transmission Line website as the preferred route.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100824	MICHAEL CHEN, C DALE WILLIS JR	SNAKE RIVER RANCH, LLC	Recently, it was brought to my attention that Mr. Carl Rountree, Director of the Office of National Landscape Conservation System and Community Programs, along with his committee made a decision to change the route to the BLM Preferred Route, which travels through miles and miles of private, productive farmland in Owyhee County, Canyon County and Ada County. How can one individual/committee make such an important decision, without input from the citizens, landowners, elected city, county, state, national officials? Even the local officials at BLM and IP were "taken-back" by the decision. There are no known scientific studies that have shown any detriment to the NCA by having the location of the transmission lines within its boundary; in fact, there has been one 500KV line that has been located within the NCA for many years, which has had no known biological adverse impact to the environment. Our property ownership has invested millions and millions of dollars in our farm and we will not stand-by quietly if the transmission line is located through the middle of our farm. We will be greatly harmed financially if that takes place! My request is to have Mr. Rountree and his committee reconsider the decision to make Segment 8B as the BLM Preferred Route and return the route to the original location (NCA) that was agreed upon by everyone years ago. Please feel free to contact our managing partner: Mr. C. Dale Willis, should you have any questions at 480-507-6200. [See figures in PDF] Sincerely,	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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			Enclosures: cc: Mike Pool, Acting Director, Bureau of Land Management Carl Rountree, Director, Office of National Landscape Conservation System and Community Programs Senator Mike Crapo Senator James E. Risch Congressional Representative Raul Labrador Congressional Representative Mike Simpson Keith Georgeson, Project Leader, Idaho Power Company John Chatburn, Interim Administrator, Idaho Energy Resources Department C. L. "Butch" Otter, Governor of Idaho Aden Seidlitz, Boise District Manager, Idaho Bureau of Land Management Canyon County Commissioners Ada County Commissioners	
100825	W GREG NELSON	CITY OF KUNA	On page 3.4-83 the Idaho legislature provided for a small exemption for operating property tax from the tax rolls, and more importantly, the report indicates that it seems to be the City's responsibility in calculating the tax revenue generated by the transmission lines- at no time has the City been provided with the value of this operating property to make this calculation. Again, instead of providing hard data, the FEIS skirts the issue by summarily shifting its responsibility to perform the studies to the City.	As stated in Chapter 1, the BLM has received ROW applications from the Proponents and must determine whether to allow the use of the National System of Public Lands for portions of Gateway West, in accordance with FLPMA and the BLM's ROW regulations, 43 CFR Part 2800. It does not permit the portion of the route on private lands; this is a County function in Idaho. Determining the taxable value of the line within an individual local taxing entity is beyond the scope of this analysis.
100825	W GREG NELSON	CITY OF KUNA	On page 3.3-64 regarding Cultural Resources, the description of the Silver Trail is woefully inadequate. The BLM prefers to call the wagon and stage route the Boise City - Silver City Road. The Silver trail was an important link between Idaho City, Boise and Silver City, and a vital part of the history of Kuna. In 1864 the Fifteen Mile House/Station was built in Kuna and established the start of the city of Kuna. A pioneer cemetery dating to that time is a recognized landmark within the city. The Silver Trail, in its established and recognized route to Melba and Walters Ferry, will be crossed by the Gateway West Transmission line within the city limits of Kuna. Why is this left out of the EIS? As we celebrate Kuna's 150th Anniversary in 2014 we will be dedicating the location of the Silver Trail Crossing, the location of the 15 mile House/Station and celebrate its vital part of our Cultural Resource and history. The BLM needs to re-address this important cultural resource and re-write this section.	<p>The FEIS explicitly acknowledges that the Boise City-Silver City Road, also known as the Silver Trail, was an important stage and wagon road that ran between Boise and Silver City. The road, now listed in the NRHP, was in use as part of a major transportation corridor from 1864 to 1910. Silver City was the county seat from 1866 to 1935. The Gateway West Proposed Route in Segment 8, and likely the Proposed Route in Segment 9, would cross this historic road in Canyon County near Melba. Assessment of visual effects on this historic property was discussed in the EIS (see Table 3.3-7 and pages 3.3-203 to 3.3-205). The visual assessment included two Key Observation Points (KOP), C88 and C89. The assessments from these KOPs are summarized below(emphasis added):</p> <ul style="list-style-type: none"> • KOP C88 (Figures 3.3-130 and 3.3-131) is located on a segment near Boise City to Silver City Road, immediately south of State Highway 45 at Walter's Ferry Historic Site recreation area on the west bank of the Snake River. The KOP is approximately 3.2 miles southwest of the Proposed Route in Segment 9, 1.9 miles northeast of the Proposed Route in Segment 8, and 1.0 mile south of Alternative 8B (which is part of the Preferred Route). The resource is located on private property and a direct assessment of the resource's condition could not be obtained due to landowner restrictions. Modern developments currently affect the setting of the resource, including a parking lot for a recreation area and a modern bridge. The Oregon NHT crossed the Snake River just south of the ferry's previous location. No trace of

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				<p>the trail is currently visible from this KOP. The Project's design shares similarities with existing structures in the area and, in general, is screened by natural vegetation. Due to these factors and the KOP's distance from the route, the VCR for this KOP is assessed as weak. The Proposed Project elements would not dominate the setting; therefore, there would not be an adverse impact to the resource at this location.</p> <ul style="list-style-type: none"> KOP C89 (Figures 3.3-132 and 3.3-133) is located on a segment of the Boise City to Silver City Road on the northern slope of Kuna Butte, approximately 3 miles from the town of Kuna. The Mora Canal is less than 0.25 mile to the north. Alternative 8B, which is part of the Preferred Route, is 1 mile to the south. The resource at this location consists of a swale. The southwest portion of the swale has been destroyed and is intersected by a modern two-track road. Although it is a short segment, the remaining swale is in good condition. Due to snow, no artifacts or wheel ruts were observed. Several residences are located within 60 meters of the KOP. More residential properties are visible less than 1 mile to the west-northwest. Views of Alternative 8B (which is part of the Preferred Route) are limited by topography in most areas but would be visible directly south of the KOP. The Project's design would introduce new structural elements to this area. Due to these factors, the KOP's proximity to the route, and the potential for the elements to be skylined along Kuna Butte, the VCR for this KOP is assessed as moderate to strong. The proposed Project elements would dominate the setting; therefore, there would be an adverse impact to the resource at this location. <p>Resolution of adverse effects to the Boise City-Silver City Road, as well as other historic linear resources, are addressed in a Programmatic Agreement (PA), which is included with the ROD.</p>
100825	W GREG NELSON	CITY OF KUNA	On page 3.3-253 the FEIS indicates again that the preferred route is inconsistent with the Kuna Management Framework Plan (MFP). The City of Kuna does not support an amendment to the MFP that would allow additional transmission line corridors to be constructed.	Your opposition to the amendment is noted. Refer to Appendix F-1 for a discussion of this amendment.
100825	W GREG NELSON	CITY OF KUNA	On page 3.4-7 table 3.4-5 gives Kuna's population as 15,548, it is now 15,930 and this figure should be noted.	The growth in population is noted.
100825	W GREG NELSON	CITY OF KUNA	Further, the FEIS seems to indicate that the City's concerns with having 150 to 180 foot towers and electric lines running for six (6) miles inside the city limits and for three (3) miles within the city's impact zone is of no consequence, and our estimates that no one would want to live under a 500 kV line is incorrect. Sorry, but having a transmission line with 150 to 180 ft. towers and electric cables that buzz on occasion, or	The FEIS recognizes the impact of a transmission line crossing the city. The analysis considered several alternatives to the route south of Kuna. In response to the issues raised by the City, County, and State governments it has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in

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			maybe more than on occasion, would definitely impact the area from being fully developed, and based upon Idaho Power's presentation, no structures, including residences and other farm structures, could be erected under the transmission lines. The weak admonition in this FEIS that others elsewhere live under 500kV transmission lines is small consolation for those that are pushed under such a scenario.	Segments 8 and 9 of the Gateway West Project.
100825	W GREG NELSON	CITY OF KUNA	It is obvious to the City of Kuna that many sections in the FEIS should have provided an in depth evaluation as to the impacts on the city, but the FEIS simply dismissed the impacts with summary conclusions, unsupported by facts. Perhaps it is because the decision to change came at the 11th hour, and there was no time to go back and analyze the impacts to the City of Kuna.	Section 3.4 includes the city's own estimate of the economic impacts from the route through the city.
100825	W GREG NELSON	CITY OF KUNA	On page 2-47 the City of Kuna is concerned that the FEIS "enhancement" requirement in the legislation is being used to justify the end result- denial of route 8 without proper vetting or consideration. The Act contains wording that protects uses, allows private land ownership and creates a rather fragmented SRBOP in its northern sector. There is plenty of room for Gateway West to cross this fragmented northern part of the SRBOP and its presence would not fragment raptor prey base habitat, rather the towers and lines would become nesting and hunting enhancements for the raptor population. See, Steenhof, K. M.N. Kochert and J.A. Roppe. 1993. Nesting by Raptors and Common Ravens on Electrical Transmission Line Towers. Journal of Wildlife Management. 57:271-281. As the Gateway City to the Birds of Prey, the City of Kuna would not want to sacrifice raptors, but putting the transmission line in our city limits would seem to sacrifice our citizens over birds. Both can be helped by moving the transmission line south within the fragmented parcels of land or in existing corridors. The City points out that the BLM's Natural Landscape Conservation group overruled the involved BLM, local citizenry, cities, counties and states and two (2) plus years of negotiations to pick 8B as the preferred route. The FEIS should reflect the actual process used to determine how the preferred route was selected.	The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. Your disagreement with this finding on the enabling legislation is noted. The BLM has decided to follow the phased decision approach, to provide additional time to work with all stakeholders to develop a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100825	W GREG NELSON	CITY OF KUNA	On page 2-197 in describing the 8B alternative, it states the location within the Kuna city boundary MAY affect future development patterns, should be changed to WILL affect future development patterns. Apart from the loss of up to 647 acres of developable land, who would want to live near or under a massive 500kV line?	All outcomes are cast in terms of would, could, or may in a NEPA analysis because no decision is made in an EIS. The decision is made in the ROD.
100825	W GREG NELSON	CITY OF KUNA	On page 3.2.12 the first paragraph outlines the route for 8B as crossing the Western Heritage Historic Byway Corridor south of the city of Kuna directly east of Kuna Butte. The line does not cross south of the city of Kuna, it crosses inside of the city limits for six (6) miles within the city and three (3) miles within the impact zone. This paragraph needs to be re-worded to be correct.	This error is noted.

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100825	W GREG NELSON	CITY OF KUNA	On page 3.2-57 again the statement that 8B and 8C were dropped from the proposed route is not correct, but this statement seems to preclude the analysis of Visual Resources for 8B that is now the preferred route. In changing the route, the BLM did not properly consider the view of the Owyhee Mountains to the residents of Kuna. Again, this would indicate BLM didn't have time to re-analyze 8B after the National Conservation Landscape group overruled everyone and chose 8B as the preferred route.	The statement in the EIS is correct. Alternatives 8B and 8C are not part of the Proponents' Proposed Route. The Proposed Route is shown on Figure A-10.
100825	W GREG NELSON	CITY OF KUNA	On page 3.2-156 in discussing KOP 329 (3 miles from transmission line) on one of Kuna's athletic fields it was determined impacts on viewers would be low to moderate. Why wasn't a site picked closer to the transmission line within the city and analyzed. The closer you get the higher the level of project visibility and the less desirable the transmission line becomes.	Four KOPs were chosen in the city or between the 8B line and the city (see Figure E.2-9). KOP 329 is located in the city, and KOPs 1333 and 1334 are closer to the line; see the simulations from these KOPs in Appendix E.2 (Figures E.2-35 and -36). These show the line from a distance of 0.9 mile and 1.0 mile, respectively. KOP 89 is also approximately 1 mile from the line. The city is a cooperating agency in the project; if additional KOPs had been requested during review of the DEIS or the AFEIS, we would have included them.
100825	W GREG NELSON	CITY OF KUNA	As an alternative, the City requests that the transmission line be aligned consistent with the collaborative efforts of the power companies, various agencies and the public. This transmission line would run near the original preferred alignment 8 route and then drop south to cross the Snake River at Sinker Butte (8E) and then up to Hemingway. It is significant to note that most of this route follows existing transmission lines and access roads to the Snake River, and the Snake River Birds of Prey National Conservation Area (SRBOP or NCA) can be enhanced with a collaborative effort on the part of various governmental entities and the Proponents.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100825	W GREG NELSON	CITY OF KUNA	Unilaterally (and at the 11th hour), the National Landscape Conservation System, which has management oversight of the Snake River Birds of Prey NCA, in an apparent abandonment of transparency, disregarded the collaborative process that recommended a route that avoids the Cities of Kuna and Melba, and recommended 8B as the BLM's preferred route. This recommendation was made arbitrarily and without an actual assessment as to the financial impacts to the Cities of Kuna and Melba or to the rights of the private property owners. Rather, in justifying its decision, the NCA staff states that an additional 500-kV transmission line in the SRBOP would not meet the intent of the law. Upon inquiry at the open house held on May 7, 2013 in the City of Kuna, the City was informed that the staffs' analysis to support its conclusion is not available in writing. This immediately raises several questions- shouldn't staffs' analysis be vetted publically and in writing where all concerned entities and the public are allowed to comment and address any claimed deficiencies? Was BLM's decision to place the transmission lines into the City of Kuna, on private property, an arbitrary decision and contrary to the evidence provided, in conflict with section 368 of the Energy Act of 2005, and in conflict of the enabling legislation and an abandonment of the collaborative process?	The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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100825	W GREG NELSON	CITY OF KUNA	<p>The City of Kuna is now the 14th largest city in Idaho, and it is the most affected municipal area along the entire proposed 1,149-mile route. As provided during the Draft Environmental Impact Statement (DEIS) comment period, in 2009, the City of Kuna and other entities, commissioned a report performed by Environmental Conservation Services, Inc. to assess the impacts of the Gateway West project. In addition, the City of Kuna staff provided a very detailed analysis of the financial damages that the City will incur if the transmission line is constructed within the City. Upon review of the FEIS, it is very disconcerting to the City that many of the concerns related to the extent of the financial damages associated with the social and economic impacts that the proposed corridor will cause to the City are not adequately addressed. Instead, the FEIS spends approximately two (2) pages (pages 3.4-82,83) discussing the annexed lands called Osprey Ridge with its projected development, and concludes that "however, other outcomes also seem possible at this time, given the current downturn in real estate markets". The City of Kuna would point out that it has experienced growth in the late 1990's and early 2000s of 183%; the City projects that its growth will pick up following the recession. In 2013, Kuna's projection for growth is more accurate than the other outcomes envisioned by the FEIS doomsday projection. For example, in 2013, there are currently nine (9) developments in the works, last year there were two (2) active developments. In addition, businesses are being constructed, industry is expanding and Kuna is growing. We feel this factor must be considered in the FEIS. In addition, the FEIS fails to rebut the City of Kuna's projected loss of tax revenue with any hard data to the contrary. Factually, the 660 feet from centerline of the transmission line right-of-way (ROW) is controlled by City Ordinance. Building is prohibited in this ROW. The City guaranteed Osprey Ridge three (3) dwelling units per acre. The possible net loss of land if the transmission lines run through Osprey Ridge is up to 647 acres. This equates to approximately 1,000 homes, and is approximately twenty (20) percent of the Osprey Ridge development, and yet these important facts are ignored by the FEIS. The Osprey Ridge development was responsible for the city expanding the City of Kuna wastewater treatment facility by 30% to accommodate the projected population increase from Osprey Ridge. The City has already incurred the costs for this expansion, which exceeds a million dollars for construction and annual expenses for maintenance. If Osprey Ridge is not fully developed, the citizens of Kuna ultimately bear the burden for this expenditure.</p>	<p>The FEIS acknowledges that the city has experienced rapid growth (see Table 3.4-5 in Section 3.4 of the FEIS). The EIS goes into greater detail in discussing the economic effects on the City of Kuna than for most other areas, in recognition of the importance of this issue to the city. The issue is not that the city considers the impacts to be greater than the BLM does; it is simply that the route the city recommends crosses the NCA. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 route through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. Adding additional data on the city's growth or the city's future ability to collect taxes would not change this.</p>
100825	W GREG NELSON	CITY OF KUNA	<p>The City of Kuna is also concerned that the FEIS includes the Idaho Army National Guard (IDANG) as a supporter of the 8B Alternative. Frankly, when the National Landscape Conservation Service dropped Proposed Route 8 in favor of Alternative 8B, again, it appears that there</p>	<p>IDANG's comment letter states that they support the Preferred Route for Segment 8 because that route would not adversely impact their training mission. Their letter does not mention support for the Proponents' Proposed Route. They have voiced</p>

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			was not time to readdress the change with anyone including the IDANG. The thrust of the IDANG was to protect the military range where maneuvering and weapons testing would have to curtailed. Since route 8 had already moved the line out of the IDANG training range, they supported route 8. When the preferred route in the FEIS (8B) it appears that the IDANG was automatically in support of change, when in fact it appears that it also would support route 8.	concerns about that route from the beginning of the process. They have also stated that the unlighted existing lines north of the training area adversely affect their training mission.
100825	W GREG NELSON	CITY OF KUNA	The City of Kuna also believes that the Gateway West Transmission line may not actually be needed. It appears that Idaho Power is in an entirely different posture than they were in 2008-09 when the project was proposed. For example, credits allowing farmers to reduce peaking power by irrigating at night were cancelled recently because Idaho Power does not need the power protection after bringing online Natural Gas plants and some green energy. On page 1-1 of the EIS it appears that the operating limitations have been solved, increased capacity has occurred and reliability has already been achieved. Granted an update of the Grid might be necessary, but the purpose and need section of the FEIS doesn't seem to reflect the Grid. The City would hate to think that it is being traumatized only to appease PacifiCorp, which has little or nothing to do with this City.	Refer to the Purpose and Need discussion in Chapter 1.
100825	W GREG NELSON	CITY OF KUNA	In addition to the general comments, above, the City of Kuna specifically notes the following: On page 1-35 if approved in the current preferred location (8A), the Gateway West opens a new Energy Corridor that would go through the City of Kuna. The City of Kuna opposed any decision that would create more corridors going through the City.	The text on page 1-35 refers to PEIS for the WWE corridor, not to the Project; the WWE corridor was completed several years ago. The City's opposition to new corridors in the city is noted.
100825	W GREG NELSON	CITY OF KUNA	The City of Kuna appreciates the opportunity to review and comment on the Final Environmental Impact Statement (FEIS) of the Gateway West Transmission Line Project (transmission line). For the record, the City strongly objects to the current FEIS proposed alignment of the transmission line through the city limits.	The City's opposition to a transmission line in the city is noted.
100825	W GREG NELSON	CITY OF KUNA	On page 3.17-109, the city is again proposing to change the city's comprehensive plan and the result will be that the Gateway West Transmission line will go through the middle of Kuna's proposed heavy industrial zone. The FEIS attempts to cast doubt on Osprey Ridge being built, but the Gateway West project will soon have to deal with our new industrial zone which we have had at least one general meeting to gauge public interest in the site which is contiguous to the city limits and well liked by participants in the meeting. We expect to change the comprehensive plan this summer.	Zoning is a city issue; the BLM has no position on this matter. The Proponents will need to work with the City on siting across private land.
100825	W GREG NELSON	CITY OF KUNA	On page 3.17-105 regarding the amendment of the MFP, the construction of the Gateway West Transmission line in the proposed location outside of existing corridors would automatically open this area for new lines to be routed in the future. The City of Kuna objects to any amendment to the MFP which allows for the creation of additional transmission line corridors.	No amendment concerning a new utility corridor for the Preferred Route for Segment 8 is proposed. The text is misleading. It was meant to only apply to the Proponents' Proposed Route. The Preferred Route follows in the designated utility corridor inside the NCA and is consistent with the Kuna MFP in this respect.

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100825	W GREG NELSON	CITY OF KUNA	On page 3.17-106 Kuna believes that more than 74 residences would be impacted by the transmission line going through the city limits and private properties in the impact zone. The City recently sent out 132 notices to people living within the shadow of the transmission line to attend the hearing and the City believes that is a more accurate figure in 2013 than the 74 in 2009.	The number was recalculated for the FEIS using the most recent coverage we were able to obtain.
100825	W GREG NELSON	CITY OF KUNA	On page 3.6-44 Discussion on Section 8 still includes the statement that 8B and 8C were dropped from the proposed route, so the impact on vegetative communities was not included in the discussion. On page 3.10-85 the statement that 8B and 8C were dropped from proposed route to avoid planned developments in Kuna and Mayfield is again not true after the National Landscape Conservation group chose 8B as the preferred route. This leaves Wildlife and Fish analysis incomplete at best.	This statement in the FEIS is correct; both were dropped from the Proponents' Proposed Route.
100825	W GREG NELSON	CITY OF KUNA	In section 3.11 discussions on Sage Grouse impacts, this year the Idaho Statesman published an article indicating the Sage Grouse react negatively to structures like towers. It is not so much the Sage Grouse dislike of activity and construction, but the towers are not preferred causing leks to finally decrease until there are no nesting sites close to a man made elevated structure. This would indicate the transmission towers themselves would have a dramatic effect on Sage Grouse populations in areas where towers would be built in Sage Grouse Habitat. In 2009 when the research for this EIS was completed, the effect of towers was not fully researched. Now, in 2013, the science seems much more definitive on negative effects of structures on Sage Grouse habitat. The information included in this EIS must be accurate and up to date.	Research for the EIS was not completed in 2009 as the comment states. The sage-grouse analysis has continued throughout the process and additional information has been incorporated into the analysis and mitigation proposals. For example, following comments on the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The tower issue is included.
100825	W GREG NELSON	CITY OF KUNA	In Section 3.21 the City doubts the validity of the studies referenced, the FEIS provides one (1) or two (2) studies to support its position where noise, electromagnetic interference, vibrations, nuisance shocks, and livestock reactions are minimized to the point they hardly exist. The buzz from 500 kV lines can be heard in Kuna from an existing line, shocks routinely occur from certain fences close to that line and dairy impacts occur throughout the nation. For this EIS to simply gloss over impacts or imply they do not exist casts doubt on the validity of the FEIS to this city. Why not provide a complete analysis or commission its own studies versus cherry picking studies to support its position.	The FEIS acknowledges that this is an issue. See the discussions in sections 3.21, 3.22, and 3.23. Figures 3.21-7, -8, and -9 show noise levels at various distances from the lines. Note that the figures show noise travels a greater distance in bad weather than in fair weather. Shocks are a problem when equipment is not properly grounded and also when equipment is near distributor lines.
100825	W GREG NELSON	CITY OF KUNA	The City agrees with the comments on page 4-54 in the Cumulative Effects section when it states "The cumulative visual impact of Alternative 8B when considered together with likely continued development in that area would be substantial. We believe other impacts within the city will also be substantial, but many of the Sections have been generalized to the point they do not address impacts in the city or on the city citizens. Nor are the effects on private land in 8B analyzed sufficiently to draw conclusions on effects in the 8B corridor.	The EIS is analyzes the impact on resources and the human environment over the length of the proposed project, not just effects on the city. There are approximately 3,000 miles of proposed and alternative routes to cover. The EIS goes into much greater detail in discussing the economic effects on the city of Kuna than on most other areas, in recognition of the importance of this issue to the city. We believe that the FEIS includes sufficient detail on the economic and social impacts on

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			If 8B cannot be moved we suggest the BLM re-do the 8B segment to include full impacts on city lands and private lands.	the people of Kuna for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the project alternatives.
100825	W GREG NELSON	CITY OF KUNA	In conclusion, the City of Kuna believes that a route that moves the line south, out of the city is necessary; the City's analysis certainly demonstrates that the transmission line does not belong in a rapidly growing city. The City of Kuna would like the BLM to consider reinstating the proposed route 8 and instead of it crossing the Halvorson Bar in the Snake River Canyon, take the line down the 257kV line to the Sinker Butte crossing of the Snake River (9D) and bring it back up the south side of the river to the Hemingway Station. This would end the dispute with both Kuna and Melba. After the line is built paralleling the 500 kV line and upgrading the 257 kV line the construction roads could be eliminated and existing roads utilized for maintenance.	The city's recommendation is noted. The BLM will continue to work with local interests to search for a consensus route.
100825	W GREG NELSON	CITY OF KUNA	The key word on BLM's mind is the term enhancements. What enhancements would the Gateway West proponents offer for putting the transmission line into the SRBOP Natural Resource Area. The City of Kuna would partner with Melba and other entities, where volunteer labor could be used to plant sagebrush, educate the cities 5,000 plus students and support improvements of habitat within the SRBOP. It may even be necessary to breed jackrabbits to enhance the population and perhaps plant grasses that are native to the area. The City of Kuna has not been asked to help with enhancements, however the City's pride and willingness of our people and students to help with habitat improvements could be accomplished, thus satisfying the goals of the NCA. For example, the City of Kuna is currently working with the BLM and Kuna's 5th grades on researching and planting native plants on the extension of the City's greenbelt along Indian Creek to duplicate the look of the area in 1864 when the Silver Trail crossed this portion of Kuna. It would not be hard to continue this effort in planting sagebrush, grasses, common native flowers and bushes and repairing some of the massive fire losses that have occurred in the SRBOP. With decreasing budgets it seems volunteer labor and Gateway West funding, a lot could be accomplished resulting in enhancements to the SRBOP and a legacy of pride and involvement by the Gateway City to the Birds of Prey. Thank you for allowing us to comment on this Gateway West Transmission Line EIS.	The offer of volunteer help is welcome. The scale of the required mitigation is well above this level. As part of their Final EIS comments, the Proponents submitted an "Enhancement Portfolio" for routes located in the NCA. The Bureau has concluded that the Portfolio, while presently insufficient, has merit and the potential to meet the enhancement requirement in the enabling legislation. However, reaching that sufficiency is estimated to take 1 – 2 years of discussion and negotiation and would unreasonably delay other portions of the project. Therefore, the BLM has decided to follow the phased decision approach to provide additional time to work out these issues.
100826	TAMMY PAYNE	CITY OF GRAND VIEW	It is my and the Grand View community's belief that the Segment 9D option which parallels the existing transmission line route is, and will be, the least invasive to property owners and to the environment. I believe this route and current land use adequately respects wildlife habitat while protecting private property owners.	The city's support for 9D is noted. Alternative 9D includes several miles within the NCA where it does not follow an existing line. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.

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100826	TAMMY PAYNE	CITY OF GRAND VIEW	Thank you for this opportunity to comment on the proposed Gateway West Transmission Line Project route. As mayor of the City of Grand View, I am both privileged and compelled to represent the interests and opinions of the citizen of our 455 member town and those property owners who live in our area of impact. At this time, I endorse Segment 9D, also supported by the Owyhee County Commissioners. This route parallels the existing line and a new road funded with stimulus money	The city's support for 9D is noted. Alternative 9D includes several miles within the NCA where it does not follow an existing line. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100826	TAMMY PAYNE	CITY OF GRAND VIEW	As the project moves forward I would also request a phased decision process to allow for continued citizen input.	The city's support for a phased decision is noted.
100827	DAVID CASE, JOHN CHATBURN, JIM TIBBS, RICK YZAGUIRRE	ADA COUNTY, BOARD OF COMMISSIONERS	Retaining the originally agreed upon alignment of Segment 8 is in the best interest of our community.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100827	DAVID CASE, JOHN CHATBURN, JIM TIBBS, RICK YZAGUIRRE	ADA COUNTY, BOARD OF COMMISSIONERS	The alignment of BLM Preferred Alternative 8B (PA-8B) identified in Appendix A of the FEIS imposes a significant economic impact on the City of Kuna and the Region. The City of Kuna has reported that it stands to lose \$76,310,584 should BLM PA-8B be used [Footnote 1] The alignment of BLM PA-8B also does not comply with Policy 7.3-3 of the Ada County Comprehensive Plan which calls for multiple-use of utility corridors by utility providers [Footnote 2]. BLM PA-8B would require the establishment of an entirely new corridor while the original alignment would follow an existing 500 kV transmission line through the Birds of Prey National Conservation Area. The additional expense of creating a new corridor instead of utilizing an existing alignment is fiscally irresponsible. For these reasons the Board of Ada County Commissioners opposes the alignment of BLM PA-8B.	The FEIS includes the City of Kuna's estimate of its future losses as part of the analysis. The issue is not that the BLM does not recognize that there would be economic impacts to the city's growth and future tax base; it is that the route the city recommends crosses the NCA. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 route through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local stakeholders and the proponents to search for a consensus route.
100827	DAVID CASE, JOHN CHATBURN, JIM TIBBS, RICK YZAGUIRRE	ADA COUNTY, BOARD OF COMMISSIONERS	The alignment of BLM PA-8B also does not comply with Policy 7.3-3 of the Ada County Comprehensive Plan which calls for multiple-use of utility corridors by utility providers [Footnote 2]. BLM PA-8B would require the establishment of an entirely new corridor while the original alignment would follow an existing 500 kV transmission line through the Birds of Prey National Conservation Area. The additional expense of creating a new corridor instead of utilizing an existing alignment is fiscally irresponsible. For these reasons the Board of Ada County Commissioners opposes the alignment of BLM PA-8B.	Permitting the line on private land is within the authority of the county, not the BLM. The BLM only manages federal land and only makes a decision on granting ROWs on federal land. The BLM is required to meet the requirements of the enabling legislation for the NCA, it does not have the option of ignoring the law. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 route through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local stakeholders and the proponents to find a consensus route.
100828	JERRY SWORD, RAMONA SWORD		To Whom It May Concern: Please note that this is a letter of protest regarding the proposed alternate route 8B through the Kuna, Melba ID area. This route directly impacts huge amounts of private land where large numbers of homes are located. The impact to home owners,	Your support for a route through the NCA is noted.

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			developers and farmers especially will be impacted negatively. Idaho Power understood this and proposed the current route and submitted it to the BLM. They are currently working on a proposal for the improvements needed to meet the requirements for improving the route since it goes through the Snake River Birds of Prey. Please note there are already corridors for large power lines through this area.	
100828	JERRY SWORD, RAMONA SWORD		After a number of meetings with Idaho Power, where the BLM was represented, many letters to congressmen, as well as the Idaho Power huge EIS studies, the current proposed route was developed and approved by Idaho Power and the private land owners. This is a good route that impacts little since power lines already exist in this corridor. Many of the local BLM employees we have spoken with also agree this is a good, workable route. It seems that bureaucrats in Washington DC don't see it this way. Instead they choose an alternate route that will cost more due to the need to purchase large amounts of private land.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100828	JERRY SWORD, RAMONA SWORD		This will impact our power bills for years to come, and not positively. It will destroy many local farmers who are already struggling. It seems to us that this is one of the most critical issues with the proposed alternate. Farming is not the most popular way to make a living these days and those that want to farm are being asked yet again to sacrifice for the US Government. Food producing farms are very important to the entire structure of this country, why destroy more?	Effects on agriculture are discussed in Sections 3.4, 3.18, and Appendix K.
100828	JERRY SWORD, RAMONA SWORD		It is also a common fact of medicine that people with heart problems, especially pace makers should not live near these high powered lines. There are many potential victims who will have to sell their homes and move elsewhere so they can survive. This is another huge issue for senior citizens who, due to the economic time, are already struggling.	Refer to Section 3.21 for a discussion of effects on health. In addition, an article published in the Journal of the American College of Cardiology in 2005, based on a study of 245 pacemaker recipients who were exposed to magnetic fields while being monitored, indicates that it is rare for magnetic fields associated with power lines to interfere with cardiac pacemakers. However, there is some evidence that these magnetic fields can cause alterations of devices programmed in the unipolar sensing configuration, according to a new report. Changing the mode generally resolved the problem. As noted in Section 3.21: "The manufacturers of pacemakers have designed their devices in various ways to minimize potential interference from external sources, including powerline EMF. For example, the increasingly prevalent bipolar pacemaker models are virtually immune to interference."
100828	JERRY SWORD, RAMONA SWORD		There is much concern regarding the impact to the SRBOP area and the food sources for the raptors that exist there. They don't know boundary lines and eat outside the boundaries as frequently as in the boundaries. The rodents, rabbits, snakes and other creatures they eat are cyclic species as it is. The raptors will not starve, be assured. The dry desert terrain in the SRBOP is subject to huge range fires that destroy more that the power line ever will. However, there seems to be little if any regard for the welfare of children, grandchildren, pets, livestock and adults that will have to live within the alternate corridor proposed by the BLM.	The issue in the NCA is not the direct effect on raptors but on the fragmentation caused by ground disturbance and new road construction.

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100828	JERRY SWORD, RAMONA SWORD		Please listen to those of us that live in these areas and understand what this will do to our quality of life. We love the raptors and watching them nest in our trees, even out of the SRBOP area. We also love our families, our farmers and our small communities. We are the heart of America and what helps make this country great. The bureaucrats in Washington should visit the area before they make these kinds of decisions with our lives and give us the ability to talk to them directly. We implore you to accept Idaho Power's proposed route. We are not opposed to the power line at all, just the placement of it.	At the Governor's invitation, senior BLM staff did visit the area. However, the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100829	SUSIE LOW		Being a Owyhee County resident. On the Gateway West Transmission Line Project I would like to see this line go To Segment 9D where it would parallel the existing 138kV line and have the new road which was funded by stimulus money in the Snake River Birds of Prey. This route would be the least impact on the Owyhee County.	Your support for 9D is noted. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for 9D which crosses through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100829	SUSIE LOW		Segment 9 route cross's over 50% of private land. Making a living in Owyhee is hard enough without our Gov and Utilities coming in and ruining our land that we have worked for so long to improve our crop fields to where we can help feed this country. It makes no sense to ruin a farmer's livelihood and send them into bankrupt. They put their money back into the community and pay plenty of tax's also to the gov. Why would you eliminate that money? This is what is going to happen with Segment 9. So I suggest that you put the line with the over line in Segment 9E where that's the logical less destructive route	The Project attempted to avoid private land where practicable For example, Alternative 9E was revised to avoid private land near Murphy and 9E leaves the WWE corridor to avoid private land where it first diverges from Proposed 9. However. as stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100830	REBECCA BRIESMASTER	GREEN RIVER CHAMBER OF COMMERCE	The Green River, Wyoming, Chamber of Commerce thanks you for this opportunity to comment on the Gateway West Transmission Line Project, WTW, 174598. We are supportive of the decisions that will allow additional transmission lines near the existing lines and substations in Southwest Wyoming. The proposal will supplement existing transmission and relieve current congestion, capacity and reliability constraints. An additional 1500 mw of energy will likely become available once the line is completed. We recognize there are many issues with locating any power line and this line. We note sage grouse and visibility impairment are two of the many issues addressed in the proposal. The Green River Chamber's community has derived significant economic benefits from past power line construction and operation and envisages similar benefits going forward. We recognize a review of the cooperating agencies speaks to the efforts the proponent and the agency to work with affected parties of this project. We agree with those that think the use of electricity is one of the foundations of our society. We support granting the proponents of the Gateway West Project approval of their Right of Way Request.	Your support for the Project is noted.

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100831	LLOYD AND JOAN NOE		We are writing this letter voicing our concerns with your proposed routes for the Gateway West Transmission Line Project. As farm owners in the Melba, Idaho, area located in the two-mile corridor of one of the proposed routes, we are definitely opposed to this project running through private property in our area. We feel that a project of this magnitude will ruin the workability of the farm property and drastically lower the farm land value. We agree with Idaho Power that the entire project would be better served if placed on public lands (BLM) so as not to disturb private land owners. Also, it would be less costly to go through public lands. Since going through private property is not the only option in this matter, the BLM is being very unreasonable in preferring to take the line through private property instead of through public land. BLM has nothing viable to support their position. Public land belongs to the citizens and BLM should listen to what the people have to say about this matter. No one wants an unsightly transmission line running through their farm or place of residence. We urge the BLM to reconsider their options and take into consideration the private land that will be destroyed by the Gateway West Transmission Line Project running through their property.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100831	LLOYD AND JOAN NOE		We feel that a project of this magnitude will ruin the workability of the farm property and drastically lower the farm land value.	Your concerns are noted. Effects on agriculture are discussed in Sections 3.4 and 3.18. Also see Appendix K.
100832	MERLE AND LINDA CARLSGAARD		First the plan going thru the Birds of Prey area is the most feasible, the reasons being, One shorter distance, two less intrusive to private land/homeowners, third less cost to power companies hence less cost to consumers of that power and finally finally the birds will be using those towers for resting and nesting habitat. The maintenance road/trail will not hamper the birds in hunting and hinder the wildlife in those areas.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The Preferred Route is longer but the Proposed Route includes moving and rebuilding several miles of existing line, thus increasing costs of that route.
100832	MERLE AND LINDA CARLSGAARD		The cost of 2 million a mile should be minimized in the distance for the power companies. The amount paid will be transferred to the consumer in the power bills. The additional costs of easement and purchasing properties will raise these costs. Hence the consumer will be hit with higher power bills.	Cost is one factor in the decision; others include protecting resources, avoiding impacts to individuals, and many other factors. In this case, the decision was shaped by the finding that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100832	MERLE AND LINDA CARLSGAARD		I live in the area affected by the current plans and just outside of the Birds of Prey Area. Fact is despite what Bird advocates say I have had Golden/Bald eagles and multiple hawks, owls resting on the power poles at my residence. They don't mind and even enjoy those roosting spots. I've had many of these birds nesting in my barn, pasture and trees. I cannot accept the agreement that this line thru that uninhabited area would hurt those birds. These animals are very adaptive.	The concern is not that birds will be harmed by the poles, but that the roads and disturbance be consistent with the enhancement requirement of the enabling legislation of the NCA based on the proposed mitigation. The BLM will continue to work with local interests to search for a consensus route.

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100832	MERLE AND LINDA CARLSGAARD		It bothers me that the Sec. of Interior would advocate the building of this line destroying homes and property values, for the individual that doesn't even know what the terrain is and what it looks like or even were Idaho is.	The secretary at the time this decision was made was the former governor of Colorado and was familiar with the lands in Idaho.
100833	SHERRY AGNEW		Lonnie and I live on Lava Lane about a half mile from this proposed line. We have ridden under the existing powerline that goes across the "Birds of Prey" area and feel that an enlargement of that line to the south would really not impact the Birds of Prey any worse than the current line that is there all seems very peaceful when we have been there and have seen multiple different types of Birds of Prey in all their many facets and they seem to be flourishing there – so I don't really believe it shall make a difference at all	Your support for routing the line through the SRBOP is noted. Please see the FEIS for explanations as to why the route, with the mitigation measures as proposed in the FEIS, was not seen to meet the enabling legislation of the NCA.
100833	SHERRY AGNEW		on the other hand should your route follow Barker Road it will very badly affect the neighbors property and/or any proposed subdivisions for the future development of Kuna and I believe that would take in over a 1,000 acres that could be impacted – for also Kuna's new rec park and Boys and Girls club – so not only does it effect property values but the chance of a really nice foreseeable future for Kunas expansion area.	The route analyzed in the FEIS was based on indicative engineering. Final routing on private land will be determined in conjunction with the Proponents, County, and private landowners.
100834	CALVIN LOW		We are disappointed that Idaho Power Co. and our federal government officials refuse to recognize that the best route for this powerline is north of the Snake River which goes through the Birds of Prey area.	Your support for Alternative 9D, routing the line through the Birds of Prey area, is noted.
100834	CALVIN LOW		Segment 9 impacts too many farms and will impact our rural way of life.	Your opposition to Alternative 9E of the Preferred Route for Segment 9 is noted.
100834	CALVIN LOW		Segment 9E, the southernmost route, plows right thru sage grouse land that I thought was supposed to be off limits to development. Why would you want to build hawk perches right thru sage grouse habitat? It makes no sense.	Alternative 9E avoids the preliminary priority sage-grouse habitat (PPH), approximately 7 acres of which would be affected due to improvements of existing roads based on indicative engineering. Final design will endeavor to avoid any impacts to PPH.
100834	CALVIN LOW		Please give Segment 9D the most serious consideration. This route is endorsed by all the local agencies and parallels a new road that was funded by stimulus money thru the Snake River Birds of Prey. This is the very best route for the new power line.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The Preferred Route is longer but the Proposed Route includes moving and rebuilding several miles of existing line, thus increasing costs of that route.
100835	JAMES & MARY FREELAND		The Melba Idaho area is a very beautiful and important, productive agriculture area. We can not have these hideous 20 story power towers crossing our valley period. Every one will be affected. Agriculture is the main business here and our valley is quite small. Too small to have it destroyed.	The actual path that the route takes on private land is up to the state and county, not BLM. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100835	JAMES & MARY FREELAND		The noise from the lines will be a constant problem and who knows how the electrical current will affect our health.	Noise is analyzed in Sections 3.21 and 3.23 and health in Section 3.22.

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100835	JAMES & MARY FREELAND		The noise from the lines will be a constant problem and who knows how the electrical current will affect our health.	Noise is analyzed in Sections 3.21 and 3.23 and health in Section 3.22.
100835	JAMES & MARY FREELAND		Every one travelling north will have to pass under them and they will be a constant eye sore.	This is correct, It is also true that people traveling north already pass under two transmission lines.
100835	JAMES & MARY FREELAND		There is plenty of room south of the snake river, south of Kuna on public land to run the lines and this is where they need to be. They need to be routed so they are not close to or crossing our homes, farms and towns.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.
100835	JAMES & MARY FREELAND		Your representative ask us where we were ten years ago when this started. Well we were here and would not have aproved these crossing our valley then or now. The BLM is employed by the people and you are failing us. You should have known we would not aproved your actions. You should and could be working with the power Co. To design the towers so they will meet curent regulations and make them exceptable for crossing the birds of pray NCA on public land. You should be working with our legislators in Washington crafting a variance to curent regulations so the lines can cross the Birds of pray NCA.	We are not clear who you are referring to as the BLM's representative. If this person's intent was to imply that you had missed to opportunity to comment, it was not a valid question. The BLM worked in good faith with the local community and government on a route that would have the least impact. It plans to continue to seek a consensus route; however, at this time the routes through the NCA cannot be approved based on the mitigation proposed to date.
100837	WILSON R VOLLMAN, TERRY VOLLMAN		We strongly support segment 8 and 9D	Your support for 8 and 9D are noted.
100837	WILSON R VOLLMAN, TERRY VOLLMAN		OPPOSE the BLM Preferred Routes - segment 8b and 9E and proponents proposed segment as expressed in the Final Environmental Impact Statement.	Your opposition to 8B and 9E are noted.
100837	WILSON R VOLLMAN, TERRY VOLLMAN		Segment 8B and 9E would place and undue financial burden on the private citizens and governmental authorities.	Your comment about financial impacts is noted. Refer to Section 3.4 for analysis of economic impacts.
100837	WILSON R VOLLMAN, TERRY VOLLMAN		The enhancement requirements to the Birds of Prey can be met within the construction processes of the project through the Morley Nelson Birds of Prey defined area.	You comment is noted; however, it conflicts with the finding of the BLM.
100837	WILSON R VOLLMAN, TERRY VOLLMAN		The BLMs preferred routes are within one mile of our home, which we have worked very diligently to maintain a country atmosphere for our children, grandchildren and now, great grandchildren - to experience. Given the energy issues that will continue to increase in the decades to come the importance of the individual land/homeowner HAS to come before the birds, training ranges and roadless areas, etc.	Your comment concerning the relative importance of people vs. birds is noted.
100838	LESLEY WISCHMANN	ALLIANCE FOR HISTORIC WYOMING	Our most significant concerns revolve around the insufficiency of your analysis of cultural resources, as defined by the National Environmental Policy Act, and the extent of impacts this project will have on those same resources. For too long, the BLM has assumed that the mandates of the National Historic Preservation Act, including its Section 106 consultation process and all the analyses, documentation and consultations that usually	The FEIS states that all cultural resources affected by the Gateway West Project are considered in the NEPA analysis. The purpose of this analysis is to "present the impacts of the Proposed Route and to compare and contrast the impacts of a range of reasonable alternatives on cultural resources" (pg. 3.3-3). The BLM is also obliged under Section 106 of the NHPA to consider the effects of

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			<p>entails, will be sufficient to address any and all impacts to cultural resources, as mandated by NEPA. While that may be true for a great majority of projects, it does not work in the face of a project the size of Gateway West. These huge, mega-projects demand strict application of the NEPA mandates as regards cultural resources. Simply relying on the Section 106 process and NHPA is insufficient. Section 3.3 of the FEIS recognizes the important difference in the analysis required by these two laws: Cultural resources include all landscapes, buildings, sites, districts, structures, or objects that have been created by or associated with humans and are considered to have historical or cultural value. Historic properties are defined at 36 CFR Part 800.16(l)(1) as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior.” Historic properties include properties of “traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.” For non-historic properties, BLM Manual 8100.03.F (BLM 2004a) states that “[c]ultural resources need not be determined eligible for the National Register of Historic Places (as in the National Historic Preservation Act) to receive consideration under the National Environmental Policy Act.” [emphasis added]</p> <p>Under NEPA, then, it is simply not sufficient to evaluate only those properties eligible for the National Register. NEPA requires the BLM to examine potential impacts to all “cultural resources” which the FEIS, at 3.3.1.3, defines as “encompass[ing] archaeological, traditional, and built environment resources, including but not necessarily limited to buildings, structures, objects, districts, and sites.” Quite correctly, this definition includes no reference to National Register eligibility, as required under NHPA. However, this is the last point in the FEIS where we can confidently say that the BLM has recognized this critical difference. From this point forward, it appears that your entire analysis is predicated on the research done for the programmatic agreement under NHPA. In other words, the rest of your analysis appears to rely on data that dealt only with properties subject to NHPA, i.e., eligible for listing on the National Register of Historic Places. With no evidence that you considered all “cultural resources,” as required by NEPA, your analysis is self-evidently incomplete. Moreover, the sloppy application of language in the FEIS on this complicated but important issue makes it even more difficult to be sure of what you have – and what you have not – analyzed. For instance, on page 3.3-3, you use the following language: This procedure allows for the recognition and disclosure of impacts on known cultural resources, as well as a comparison of alternatives, based on a method that endeavors to assess those alternatives with a uniform and consistent approach. The procedure being referenced is the information developed for the programmatic agreement under Section 106. The above-quoted sentence would be correct if it read: “This procedure allows for the recognition and disclosures of</p>	<p>this undertaking on historic properties, those cultural resources that are considered eligible for listing in the NRHP. The FEIS notes further on (pg. 3.3-4) that “The final determination of impacts and resolution of adverse effects, through the Section 106 consultation process, will not be complete until surveys of all lands to be crossed by the approved Project route have been completed. Only then can the BLM and other federal agencies complete their obligations under Section 106 and the PA.” The first phase of the NEPA analysis was a Literature Review, which identified all known cultural resources within a one-mile-wide corridor along all alternatives of the undertaking (emphasis added). All of the sites identified in the literature review form the corpus of the cultural resources that are considered in the NEPA analysis and are used to inform all subsequent phases of the analysis. The final determination of impacts and resolution of adverse effects to those cultural resources that are considered eligible for listing in the NRHP (i.e., historic properties) will be complete when pedestrian surveys of all lands crossed by the approved Project route have been completed. Because the BLM’s obligations under Section 106 and NHPA have not yet been completed, the cultural resources considered in the NEPA analysis are treated as if they are eligible for listing in the NRHP (emphasis added).</p>

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			<p>impacts on known historic properties” but, in its current language, it is simply inaccurate. The analysis conducted for the PA tells us nothing definitive about all cultural resources, as defined by NEPA. You do say that these two phases of research under Section 106 were “designed to be completed with the intent of informing the NEPA analysis.” [pg 3.3-3] But that assurance is all we get. Nowhere in the list of properties and analysis is one that is identified as not being eligible for the National Register but included due to the mandates of NEPA. We are left with a very uncomfortable assurance that the analysis, meant to “inform” the NEPA process was somehow fully adequate but we have no real evidence to support this general assumption. Since the consultants that are routinely hired to do these Class III inventories for the Section 106 process are used to considering only NRHP-eligible sites, we are far from sanguine when asked to believe they changed that pattern on the non-existent evidence of such in this document. When you add to that what appears to be rather loose and inconsistent use of language in this document, our level of concern is heightened. Again on 3.3-42, we find language that we cannot confidently interpret: Historic Sites – This category comprises the remaining resource types that do not share a related socioeconomic theme. These resource types include inscriptions, military sites, and urban and rural sites: “Historic site,” of course, has a specific meaning under the National Historic Preservation Act. But is that how it is being applied here? We aren’t sure. And then, on 3.3-52, we find: Homesteads, Ranches, and Sheepherding Camps These cultural resources represent important parts of Wyoming’s economic history. Cattle ranching started first in the area as early as the 1850s when Captain William Sublette and Jim Bridger began to supply cattle to emigrants and freighters at nearby military forts (Massey 1992b). When this says “cultural resources,” are you applying the NEPA definition? By this point in the analysis, we really don’t know. We understand as well as anyone how difficult and confusing the terms are when it comes to NEPA and NHPA and how frustrating it can be that what means x in NEPA means y in NHPA. But that makes it all the more important to make sure the language is used precisely and consistently. This entire section of the FEIS detailing the resources along the project route is a wonderful summary, with nice capsule histories for each, but because of a lack of strict attention to language, it is confusing at best as to whether they are being discussed under Section 106 of NHPA or under NEPA. A full, complete and unambiguous NEPA analysis of “cultural resources” as defined by 40 CFR §1508.8. Without being assured that this analysis had occurred, the BLM has failed and commenters on the FEIS, including AHW, are incapable of responding to your section on “Impacts Common to All Alternatives” with any confidence.</p>	

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100838	LESLEY WISCHMANN	ALLIANCE FOR HISTORIC WYOMING	<p>We have an additional concern with the analysis conducted. Nowhere in this document did we find any evidence that the project area has been evaluated to determine whether there might be any historic or cultural landscapes within the very extensive APE. These NRHP-eligible landscapes are very distinct from trail viewsheds, historic districts and Traditional Cultural Properties, all of which we do find have been considered within the FEIS. But we believe this document is deficient in not addressing the possibility of either NRHP-eligible landscapes or culturally significant landscapes that may not be NRHP eligible but which must be considered as a cultural resource under NEPA. Landscape analysis has become ever more important in the last few years and, especially with a project of this size, we must have a full analysis of potentially significant landscapes identified and any potential impacts analyzed.</p>	<p>Section 3.2 of the EIS analyzes the potential effects to landscapes that are generally referred to as "Visual Resources". The BLM uses the National Landscape Conservation System to protect landscapes for not only scenic quality but also for cultural resources on public lands. Both the BLM and Forest Service have handbooks (Visual Resource Management) that aid us in analyzing landscapes and the degree of change a project may have on the existing landscape. In that section regarding visual resources, several Key Observation Points were utilized that were not attached to historic trails, TCPs, or historic districts. Those KOPs assisted in analyzing the changes in the landscape that may occur as a result of the preferred route and alternatives regardless of whether or not these landscapes are eligible cultural properties or culturally significant properties that may not meet the NRHP criteria for significance. Those KOPs were identified through public outreach efforts/scoping for the project. We do not have all of the information ahead of the EIS to determine every effect to National Register of Historic Places eligible properties including landscapes because we do not have 100% on-the-ground coverage. We have therefore spent the last 4 years developing a Programmatic Agreement that addresses how effects to historic properties (which include significant cultural landscapes) will be avoided, minimized, or mitigated in consultation with interested parties including special interest groups, tribes, and landowners. Tied to this Programmatic Agreement are on-the-ground cultural resource inventories that will identify cultural land-scapes prior to the Notice to Proceed for project construction.</p>
100838	LESLEY WISCHMANN	ALLIANCE FOR HISTORIC WYOMING	<p>We do very much appreciate that you have expanded your socio-economic analysis to include an expanded analysis of the potential effects of this project on tourism. [3.4.15] We believe that your finding that tourism is a major component of the economy throughout the state, but most especially in Carbon County, justifies our concerns about this project, especially when considered in combination with all of the other development occurring in southern Wyoming along the I-80 corridor. We were especially interested to note that the 2012 report by Strategic Marketing and Research, Inc., found that, in 2011, 26 percent of those visiting the state included a historic site in their travels. This is an especially significant finding, considering that the same study found that only 4% came to the state specifically to visit a historic site. This proves the peripatetic and synchronistic quality of heritage tourism. Obviously, these visitors saw a site that interested them and stopped to enjoy it. From other studies, we know that this is the kind of behavior that often results in visitors spending more time – and thus, more money – in our state. AHW continues to worry that if visitors</p>	<p>Your comments on tourism are noted.</p>

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			begin to perceive of an area as simply an industrialized zone – as the I-80 corridor is rapidly becoming, thanks to the cumulative effects of all these large projects – they will not look for that serendipitous discovery and Wyoming will lose out on a large chunk of tourist dollars that could have been had. Moreover, this decision by tourists to pass by a state or region can have a devastating impact on small, historic attractions such as local museums and if those institutions fail, there will most definitely be a ripple effect as the “human capital” is diminished.	
100838	LESLEY WISCHMANN	ALLIANCE FOR HISTORIC WYOMING	Finally, we were interested in reading the following in 3-4-17 on Natural Amenities and Quality of Life: Natural amenities and local quality of life have been recognized as important factors contributing to the economic prospects of rural communities in the American West (Rudzitis and Johnson 2000; Hill et al. 2009). While natural amenities do not directly generate income in the same sense as oil and gas exploration or a tourism lodge, they can influence household and business location decisions and act to attract and retain residents and businesses that are not otherwise constrained with respect to their location. We believe that “natural amenities” in this context is very likely a close synonym of “cultural resources” under NEPA. This, then, provides additional support for the importance of conducting a full analysis of “cultural resources” as defined by NEPA, over and above the analysis mandated under Section 106 of NHPA.	Refer to the Programmatic Agreement in Appendix N of the FEIS for details on how cultural resources will be protected.
100839	MICHAEL KERSHNER		The power line should be placed in areas where it affects private property the least.	Your recommendation that the transmission line avoid private land is noted. Avoiding impacts to private property was one of the factors considered in routing.
100840	SHELLEY SEARLE	MOO VIEW COW PALACE	These powerlines will interfere with human livelihood. Is that more important than a bird?	The issue is not that the BLM wants to interfere with people's livelihood; it is that the BLM found that the proposed mitigation and EPM measures provided for the routes through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM is required to follow the law.
100841	CAROL ROWE, CHRIS ROWE		I endorse the Segment 9D route. This route parallels the existing 138 kV line and the new road through the Snake River Birds of Prey. I do not agree with running it through private property or in the foothills of the Owyhee's.	Your support for a phased decision is noted.
100841	CAROL ROWE, CHRIS ROWE		Also we support a "phase decision."	Your support for 9D is noted.
100842	BEVERLY SEARLE		If these are public lines why don't they go on public property? If these lines go up it will interfere with our pivots, GPS, television, radio, and two-way radio. Repairmen will not work on our pivots if they are by these lines. What is the world coming to when birds are more important than human livelihood? We don't want to be liable for these lines on our property.	The issue is not that birds are more important than people; it is that the proposed mitigation and EPM measures provided for the routes through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM is required to follow the laws. The BLM will continue to work with local interests to search for a consensus route.

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100843	CRAIG SEARLE	MOO VIEW COW PALACE	If these power lines are for the public, why don't they go on public property?	The transmission lines are on public lands for the majority of the Project, which crosses over 1,000 miles of land in two states. However, as stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100843	CRAIG SEARLE	MOO VIEW COW PALACE	These lines will interfere with our GPS, television, radio, two way radios, etc.	Refer to the discussion on these issues in Section 3.21.2. Note that the effect dissipates rapidly outside of the 250-foot-wide ROW (see Figures 3.21-6 and 3.52-7).
100843	CRAIG SEARLE	MOO VIEW COW PALACE	Repairmen will not work on our pivots if they are near these lines. We don't want to be liable for these lines on our property.	Refer to Figure 3.18-2 for an example of the proposed tower placement. The distance that the lines must be from structures and other facilities on private lands is a state and county permitting issue. The BLM has no authority to require setbacks on non-federal lands.
100844	MARK KERNS		I think you should route this line through the Birds of Prey area. I spend a lot of time there are lines will not bother me at all.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100844	MARK KERNS		I think you should route this line through the Birds of Prey area. I spend a lot of time there are lines will not bother me at all. This way no private land will be affected. You should run it beside existing line with road in between the two lines.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100845	JIM HOBBS		This project should not cross private land. Private land in the state is almost all agricultural land that is food producing for the entire country and the world. Don't take private land. The towers will not bother the sage grouse. It will inhibit agriculture.	Given the land ownership patterns in Idaho, it is not possible to only site the transmission on public land. Research indicates that towers do adversely affect sage-grouse; see section 3.11.
100846	EUGENE MOON		I believe the BLM has horribly miss-managed public lands. All BLM ground should be sold off to private investors.	Your desire to have the public lands managed by the BLM sold is noted.
100847	JACQUELYN BROTON		I rent a home owned by Frank Sean over which the Gateway West Transmission Line crosses. I object to is line crossing private property. The noise would be prohibitive, due to frequent winds and storms unsafe to people and animals which live here. The must be another area to cross other than the planned.	Your objection to the Project crossing private property is noted. Noise and health effects are analyzed in sections 3.21, 3.22, and 3.23. Figures in Section 3.21 show the noise levels at various distances from the lines, depending on the weather.

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100848	JERRY LANKFORD		What benefit will the people of Idaho see from this line? We must sacrifice for those who don't want us to take down trees, or have fuel for cars and trucks, they don't want the power plants in their back yard; lets let them do without since that is their stand on these issues.	Your concerns are noted. The new lines will improve the overall functioning of the grid and enable the Proponents to meet a growing need for power in their service areas, both within and outside the state.
100849	ROBERT MILLER		My preference of Gateway West Transmission Line would follow 9G commencing south of Bruneau Dunes State Park, westerly to join 9H route, then westerly to join 9 route to Hemingway Butte. This route would most likely avoid private lands and towers and especially avoid the Melba impact farm and city area	Your support for Alternative 9G is noted.
100850	ROBERT GREENE		Preferred alternative by BLM looks like the best choice. Some interest groups will always be unhappy but, decisions on public lands need to be made for the greatest good for the greatest number of public. Good job: let's get started.	Your support for the Preferred Route is noted.
100851	RUSSELL STEINER		My biggest issue is whether IF Idaho Power even needs this additional powerline	The need for the Project is discussed in Chapter 1.
100851	RUSSELL STEINER		Why not take existing lines and put in heavier lines to support additional power, if it is needed. I don't support any of the routes as it diminishes property values no matter where it goes. Our human lives and property values are certainly more important than dim-witted sage grouse and other bird species that BLM thinks is important. Idaho Power needs to prove they really can not do this project in some other fashion.	Refer to the discussion on reliability requirements in Section 1.3 of the FEIS.
100852	RICHARD KERSHNER		This power line should go in the Birds of Prey to Walters Ferry Area as agreed to at the one Melba meeting	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100852	RICHARD KERSHNER		Not near Kuna, ID. The #8 Line	Your support for Proposed Route 8 near Kuna is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100853	DOREEN MCMURRAY		I have serious concerns about the proposed routes. I strongly feel transmission lines should NOT cross private farm ground. This will effect the production and livelihood of our local citizens. Why are you risking their production and operation when you DO have acceptable alternate routes? I ask you to consider private citizens/landowners concerns.	Your opposition to siting the lines on farm land is noted. Effects on agriculture are discussed in Sections 3.4, 3.18, and Appendix K.
100854	MARY REED		Please do not interrupt existing farms and cow, house, pigs and people when there is plenty of ground that can't be used for these things that already exist.	Your opposition to siting the lines on farm land is noted. Effects on agriculture are discussed in Sections 3.4, 3.18, and Appendix K.

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100855	PAT MCCAMMON	SIX S RANCH LLC	I would like to see more consideration to the land owner's of Cassia County. There are two alternate routes, north and south	Effects on private property are discussed in Section 3.4. Effects on Agriculture are discussed in Appendix K, and in Sections 3.4 and 3.18 of the FEIS. The BLM worked with landowners in Power and Cassia Counties for three years and included alternatives requested by the Counties in the EIS. However, the BLM could not approve Power County's preferred route for Segment 5 (Alternative 5C), because the route crosses the Fort Hall Indian Reservation and the Tribal Council voted not to permit the project to cross the Reservation. The BLM has no authority to override this decision (refer to Section 2.4.1.1). The BLM could not approved the Counties' preferred route for Segment 7 (Alternative 7K) because of the adverse effect on sage-grouse and the far greater ground disturbance and cost.
100856	CALEEN HEWARD		concerned about the amount of private land being used for a government/BLM project.	This is not a BLM project. Rocky Mountain Power and Idaho Power have requested a ROW across public lands managed by the BLM and the BLM is required by law to consider this request. See section 1.2.1.
100856	CALEEN HEWARD		concerned that a study of the economic stress on the private land owners was not addressed. It seems to me that if a sage grouse was important enough to have a through study made - WHY isn't private land owners given the same consideration.	Refer to Section 3.4 for effects to private property. In response to requests by farmers in Idaho, an independent agriculture specialist was hired to assess the economic effects on agricultural operations (see Appendix K, as well as in section 3.18 of the FEIS).
100857	MICHELE HINTON		I've seen sage grouse on a lek near Oreana. There is nothing high, no power poles or cliffs or trees, that raptors can per on or roost on. If these power lines are located near a lek then the raptors will have places to perch and will increase their predation on the grouse. The grouse will be negatively affected by putting powerpoles near their leks. The raptors will not be negatively affected by having more powerpoles in the birds of prey area. The raptors use the powerpoles for roosts and perches.	The FEIS discloses that the Preferred Route near Oreana would be adversely affected and includes mitigation. This route (9E) generally avoids preliminary priority habitat (PPH) for sage-grouse but does cross general habitat.
100857	MICHELE HINTON		The raptors will not be negatively affected by having more powerpoles in the birds of prey area.	The issue involves the level of ground disturbance and new access roads in the NCA. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100858	RICHARD KERSHNER		Line 8 to 138 V line from CJ strike Dam line southeast to 9D to 8E 9F 8D is fine CJ strike line NW to 9G and 9H to Murphy area to 9	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.
100859	MELANIE CHRISTENSEN		The BLM did a good job studying the impact of the Gateway West Transmission Line on sage grouse but did not study the economic	The BLM hired an independent agricultural specialist at the request of Power and Cassia Counties to provide an analysis of

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			impact it would have on farmers and private property. I am concerned that the line goes through one of the most productive areas of Cassia County. Also if this is a BLM project why don't they use primarily BLM land instead of 80% private land. I would like to see some adjustments made to the route so that it will not hurt Cassia County's economy.	the effects on agriculture. Refer to Appendix K of the FEIS. This information was used to revise the analysis in the DEIS. See Sections 3.4 and 3.18 in addition to Appendix K.
100860	ERIC CHILD	BASIN FERTILIZER AND FEED	After reviewing the displays and the information expressed by the BLM personel at the open-house held at the Old Kuna Gym, I definately think that the proposed route, not the BLM preferred alternative, would by far be best (Segment 8 Proposed). The Segment 8 Proposed route, would be more cost-efficient, less problem-atic, and less-disrupting for many families. Thank you.	Your support for the Proposed Route in Segment 8 rather than the BLM Preferred Route is noted. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100861	JUNE MILLER		As stressed before, we prefer alt. Segment 8, 8E to 9D as opposed to the route that goes down Melba Road.	Your support for the Proposed Route in Segment 8 rather than the BLM Preferred Route is noted. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100861	JUNE MILLER		As former P+Z Commissioner to Melba I again oppose the idea of any transmission lines near Melba's city impact area. There is no reason to curb the future growth of our city. Yes it would impact future growth.	Your opposition to a transmission line near Melba is noted.
100861	JUNE MILLER		As a second route for transmission lines I propose Segments 9F, 9G, 9H to Murphy and Hemingway. All lines need to follow the Birds of Prey route where available. Stop ruining our farms and cities.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100862	BILL & BEVERLY WHITE		After reading the BLM Decision on the right-of-way application, I believe the portion from Wyoming to about the Cedar Hill area could be granted, But the rest should be put on hold for a bit longer until the cooperating agencies and private citizens can come to a concensus on the remainder of the route. I believe Idaho Power has some good ideas on rebuilding the 130 kw line making it a 500 kw line then hanging the 130 kw line on it also, with less impact on the area. With the work that has all ready been done, this proposal shouldn't take very long compared to the long fight that lays ahead with the BLM proposal. Thank you.	Your support for a phased decision is noted. The BLM has decided to follow the phased decision approach

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100863	ANDREA CHILD		Segment 8 Midpoint Substation to Hemingway Substation avoids most populated areas and stays south of cities like Kuna and Melba and SRBOP areas. Here where we live we often see birds of prey roosting on power poles and hunting rodents etc in the fields on both sides of the road. I like 8e, f, g, h, i best, although 9b (red on Seg 9 map) looks very good and perhaps less expensive than 9e further south. But Segment 8 e f g h i avoids more populated traffic areas.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100864	DOLORES AND NELWYN HOAGLAND		I have commented previously and have nothing more to say except it is my opinion that what the people in Idaho say doesn't matter. BLM and the power companies involved are only concerned with what the so called conservationists back east want. Why not listen to those who live here? Let those back east take care of the east and let Idaho take care of Idaho. It is very disgusting to have New Yorkers, DC folks, and other easterners telling how to manage our great state!!! (and I was told at one of your meetings the east wouldn't let them go through certain areas.)	It is correct that the NLCS staff in the BLM's Washington Office found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The land within the NCA is public land, owned by all the people of the United States whether they live in Idaho or another state. These lands are managed according to a law passed by Congress. The BLM must follow that law in managing these lands. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100865	ROBERT FLOOD		I have followed this project from 2008. I sometimes was active in its proposed route. I now find it interesting and rather disappointing that with the staff of the BLM in Wyoming, Montana, and Idaho, the Idaho governor's office, the local land holders, and county government and city government, conservationist groups, and number public meetings, a route finally agreed upon by all the participants was trashed. By whom? A bureaucrat from Washington. And please don't use the excuse given. That means all the BLM managers and employees do not know the laws and regulations. But also I find it interesting that no one from Washington attended the latest public input hearings. I presume Washington know what's best for us out west!!	Your comments on the process are noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100866	RAEOLA CRANE		I am concerned that BLM project is putting so much stress on private citizens. If it is a BLM project it should be put mostly on BLM ground. It seems that taking 80% of private farm ground out of production would be an extremely hard economic strain on Cassia County. The sage grouse were taken very seriously and given a thorough study. It seems that private farm owners should be given the same time and effort to distinguish the economic stress this project would be on them.	This is not a BLM project. Rocky Mountain Power and Idaho Power have requested a ROW across public lands managed by the BLM and the BLM is required by law to consider this request. See Section 1.2.1.
100867	LONNIE AGNEW		I don't feel that the Birds of Prey area would be effected if power lines go through the area. I read an article which estimated the number of Golden Eagles and other birds which are killed by wind power generators. An amazingly high number. I can't believe it would do more harm to put the lines through birds of prey, I am for moving it further south of Barber Rd. Political donations will probably win. It is a crime that this is allowed to happen.	It is the amount of ground disturbance and new roads that is of concern, rather than the effect of towers on the raptors. Projects in the NCA must enhance the area; new roads and ground disturbance do not enhance the area and suitable mitigation was not offered at the time the FEIS was completed.

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100868	SUSAN KELLY		I live on a nice quiet dead end street that adjoins a route that is about to become my nightmare with power lines. I moved to this property 10 years ago for the peace and quiet. We are a small subdivision, Forrey Heights in Kuna. I am opposed to bringing the power lines in that sub or near it when they can be moved out to the Morley Nelson Birds of Prey along with other power lines that exist. There is no need to have these lines that close to Kuna or my community.	Your opposition to Alternative 8B is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100869	ROGER M MORLEY	JEROME COUNTY, BOARD OF COMMISSIONERS	The dumping of the electrical power occurs in Jerome County. That is where the power goes before it is split off and goes south to Los Angeles. What kind of security is Jerome allotted in protecting the Jerome substation. This station would be a perfect terror operation to strike at L.A. and not even be close to the epicenter. Just a thought.	Security at the Jerome Substation is beyond the scope of this analysis.
100870	JEANA MCBRIDE		I'm a support of private landowners affect by path that passes from RR—Golden Valley. IE Brent Stoker and rest. My heart goes out to those families. I'm a landowner 7 miles west of Burley along Snake River and would be furious if this path was forced through a 3 generation farm such as our Hobson Farms.	Your support for area landowners is noted.
100870	JEANA MCBRIDE		If you, Idaho Power, intend to force this upon the county, have the cables etc buried, as is the practice in Europe.	Burying the transmission line is discussed in Section 2.6 of the FEIS. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
100871	RAY HELMS		Look on back you are backwards anyway Why don't you county laws we have to. Why not put these on public lands. Sage grouse don't pay taxes. Why do we have to support Californias power. Why do our rates always go up I going to find sage grouse. Mabe that will stop you	Your opposition to the Project is noted. The BLM has followed the country's laws, including NEPA, FLPMA, and the enacting legislation. The reasons the BLM identified the preferred route are included in section 2.4.1.1. The BLM is not involved in setting rates for electricity.
100872	BOYD ANDERSON	OSPREY RIDGE PARTNERS, LLLP	On our farm, we have lots of trees and I think a higher concentration of raptors birds than any spot on the designated birds of prey area. Sometimes we have as many as 15 to 20 hawks soaring and gliding above the trees. They seem to be playing in the wind currents here. Right now, a pair of red tail hawks and another larger bird that I haven't been able to identify, are nesting on our place; plus many owls. In the fall and winter there are many thousands of Canadian geese and hundreds of Snow geese; also ducks by the thousands. The flocks circle and circle, then land. What will a taller power line do to them? Our neighbor, LaVar Thornton, when combining grain last fall, counted over 100 hawks on the fence line. This was not a first occurrence. Wildlife will adapt to different environmental conditions. Tractors and machinery in the fields do not discourage them. Building and maintaining a power line will not be a detrement to their environment.	Your observations concerning raptors are noted.
100872	BOYD ANDERSON	OSPREY RIDGE PARTNERS, LLLP	Our farm is surveyed and plotted for a project with houses, golfcourse, greenbelt, clubhouse,etc. A huge power line through the middle will nulify it's feaseablity.	Your comments on converting your farm to a subdivision and golf course and how this would be affected by a power line are noted.

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100872	BOYD ANDERSON	OSPREY RIDGE PARTNERS, LLLP	One powerline already exits on the south BLM ground. Another line parallel to it, seems to be the logical place for The Gateway West Transmission Line Project!	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100875	JON STOSICH		Myself and my household of 6 do strongly support segment 8 and segment 9D and OPPOSE the "BLM preferred Routes"(Segment 8B and 9E and proponent's proposed segment 9) as expressed within the Final Environmental Impact Statement. Our Kuna and Melba Communities will be negatively impacted by the BLM preferred Routes. If BLM preferred routes are excepted, then the collaborative effort as Idaho citizens and our Idaho governmental authorities will be turned back as meaningless by Washington DC. DO THE RIGHT THING WASHINGTON, do not except BLM preferred Routes and select either segment 8 or 9D.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100876	DAVID L PALFREYMAN		I am in favor of the "Proposed Route" not the "BLM Preferred Route." The "Proposed Route" is the least injurious to the Citizens of Idaho. The BLM Preferred Route is the most injurious. If BLM prevails their will be contention and years of litigation. BLM's Preferred Route" will injure many landowners to a significant scar on their property and nearby neighbors. Why are the people of Idaho and their representatives opinions being ignored? We live here!	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100877	DEANNA RATCLIFF		Which ever way you go is fine with me I do not mind the power lines and am fine with having them we need the power and I like everything that power runs	Your comment that we all need power is noted.
100880	VERNON CLIFFORD AND ELAINE MILLER		We greatly oppose Gateway Power Line Route Segment - 7 which goes through 3 miles of our farm land - there will be no land left to raise food + crops for our generation and others to come. We had numerous sage grows on our land in past years	Your opposition to Segment 7 is noted. Effects on agriculture are included in Sections 3.4 and 3.8, as well as Appendix K.
100881	GREGORY SANCHEZ		Please, Don't bring the Power Lines through the Melba Valley. It's our front yard... It's our back yard.... Its our home.	Your opposition to a transmission line in Melba is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100882	PAUL NETTLETON		I support alternative 9-D as the best route for the transmission line.	Your support for Alternative 9D is noted.
100882	PAUL NETTLETON		I also support phasing of the project to give us time to convince the powers that be, not to route this line over my son's house and practically over mine in Sinkers Creek between Murphy and Oreana.	Your support for a phased decision is noted. The BLM has decided to follow the phased decision approach for Segments 8 and 9 of the Gateway West Project.

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100883	DAVID L & BARBARA M LAHTINEN		If this line is built it should go north of the Snake River where there is already one built + all of the maintenance roads + access already there. This is public land + should serve all the people not just the killer birds.	Your comment that the transmission line should be north of the Snake River adjacent to an existing line is noted.
100884	RICHARD KERSHNER		No to lines 8B and 9E	Your opposition to 8B and 9E is noted.
100884	RICHARD KERSHNER		Yes T.138 KV line (CJ strike Dam Line) 8D OK 8E to 9D to 8 CJ strike Dam Line NW to 9G to 9H to Murphy Area to 9 and Hemmingway	Your support for "8D OK 8E to 9D to 8, CJ strike Dam Line NW to 9G to 9H to Murphy Area to 9 and Hemmingway" is noted.
100885	ANONYMOUS		Some time ago I went to a hearing at the Oreana Hall where it was agreed upon by all parties present that the best route would be through the Birds of Prey Area because it would give the Eagles a roost from which to fish. The center route here would blank out all over the air T.V. The southern route would give the Eagles and Hawks roosts to further destroy the Sage - Grouse population.	The Preferred Route (9D) does not go through Oreana; it passes about 2 miles to the west. Alternative 9E would not pass within 1,000 feet of any residence. Refer to Section 3.21 for a discussion of how the transmission lines may affect electronic equipment.
100886	SUZANNE C MURPHEY		The preferred route going to the South of Salmon Falls Creek Canyon is an excellent choice. Not only will it allow future lines to proceed thru the vicinity with little impact but it also prevents the purchase of farm ground if the route were to go on the North side of Salmon Falls Creek.	Your support for the Preferred Route near Salmon Falls Creek is noted. Avoiding impacts to agricultural land was a major factor in choosing this route.
100886	SUZANNE C MURPHEY		The alternate route on the North side of Salmon Falls Creek is unacceptable. It is damaging to protected farm ground, wildlife, and the local way of life.	Your opposition to the route on the north side of the canyon is noted.
100887	MARJ CRANER		the line needs to go on the alternative 7K route on government ground missing private homes and private farm ground. People are more important than sage grouse. The power is not for our area and we should not have to give up personal land for it.	Your support of Alternative 7K is noted.
100888	TONI GRUENWALD, ROSS GRUENWALD		We are protesting the Gateway proposed route through Owyhee County. Most of Owyhee County's private land runs up the State Highway 78 corridor. This includes our communities, our ranchers and our farmers. These people and these communities are important to Owyhee County.	Your comments on the route in Owyhee County are noted.
100888	TONI GRUENWALD, ROSS GRUENWALD		Owyhee County has thousands of acres of public lands that are uninhabited. It is unnecessary to install a high power voltage line through communities when there are several other alternatives. We have been following the Gateway Project and it has become clear to us that Owyhee County residents are not being listened to. We do not ask that the project go away. We ask that this line be constructed on the thousands of acres of public land that are available.	The majority of the Preferred Route in Owyhee County is on public land. Approximately 95 percent of Alternative 9E is on public land, the same as the County's preferred route. Both routes cross 3.3 acres of private land.
100888	TONI GRUENWALD, ROSS GRUENWALD		If the only alternatives were Owyhee county communities or the Birds of Prey I suggest you construct this line through the Birds of Prey. I doubt the birds will mind this intrusion as much as our farmers and ranchers will. However, this is not the only alternative. There are several already mapped out and I am sure several more that have never been mapped. Take this project away from our communities. Use the public lands available to you. This is not Los Angeles where there isn't any public	Due to the ground disturbance and new roads, the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to

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			land. We are surprised we have to point this fact out however we are happy to do so.	siting issues in Segments 8 and 9 of the Gateway West Project.
100889	DONALD L CRANER		I have attended the meetings discussing the Gateway project. I have listened carefully and feel the best route that would affect the least amount of people and property is the 7K route. Whats more important, people or sage grouse?	Alternative 7K would have the least effect on private property. However, it is approximately 30 miles longer, and construction would be approximately 60 million dollars more than the Preferred Route based on the line drawn across the map by the counties. An actual design would likely be somewhat longer (see Figure 2.4-3 for an example). The additional cost would be passed on to the rate payers. Alternative 7K would cross 55.1 miles of private land, compared to 85.8 for the preferred route. Alternative 7K would impact 1,386 acres of sage-grouse PPH compared to 149 for the preferred route. The BLM could not select a route with that level of impact to PPH.
100890	CADE PALMER		I am a paraglider pilot born and raised in Idaho and have flown Test hill outside of Declo, ID multiple times and would love to keep enjoying the great flying opportunities offered there, Power lines would ruin the site and it would be a sad day for paragliding and hangliding in the state of ID. Please explore all other options and if at all possible avoid putting them across test hill.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the Project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100891	CHRIS SANTACROCE		Please don't put the power line on test hill. I have been flying that area since 1992 and would love to fly there with my kids some day. So many places to put power lines	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100891	CHRIS SANTACROCE		please just jockey them off to the side somehow so that they don't disrupt recreational activity etc.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100892	SHARON STRICKLAND, RICHARD STRICKLAND JR		"...proposed transmission line runs in parallel with other lines but at a separation of at least 1500 feet..." OBJECTION: The line that currently runs below our house, approx. 1/4 mile south of us does not have 1500 feet on either side of it in which to put new transmission line--private property (ours and neighbors-not the property owners where line now runs) are closer than that. There are now 80-ft high wooden poles w/transmission lines. You cannot physically put 160/180- foot lattice towers within 1500 feet of that line	The separation criteria (1,500 feet) refers to other 500 kV lines. Segment 8 parallels south the an existing 230-kV line in this area. The line only needs to be offset by the ROW widths of both lines (about 187 feet). Also, your property is on the north side of the existing line. The new line, if built, would be on the south side, based on the current proposal.
100892	SHARON STRICKLAND, RICHARD STRICKLAND JR		and even if you make the separation smaller (IF you could obtain a ROW to do so), it would adversely affect our views and our property values	Noted.

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100892	SHARON STRICKLAND, RICHARD STRICKLAND JR		in addition to area populations of deer, pheasant, ducks, geese, quail, rabbit, fox and coyote	The presence of wildlife is noted. Effects on wildlife are analyzed in Section 3.10.
100892	SHARON STRICKLAND, RICHARD STRICKLAND JR		Did you even bother to check out our "KEY OBSERVATION POINT" from our house, which has southern exposure, with outside decks directly facing the proposed path where you want to put 160/180-ft towers only about a quarter mile from our house?	Viewpoints and KOPs are shown of the maps in Appendix E. Approximately 1,500 were selected. None are located on your porch.
100892	SHARON STRICKLAND, RICHARD STRICKLAND JR		We strongly object to the BLM-preferred route for Segment 8 of the proposed transmission line.	Your opposition to Preferred Route 8 is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100892	SHARON STRICKLAND, RICHARD STRICKLAND JR		Figure A-10 indicates there are other alternatives for the portion of that route between Midpoint Substation and Glenns Ferry, across mostly federal land.	The comment is correct; there are alternatives for Segment 8. Refer to Chapter 2 for a discussion of these alternatives.
100892	SHARON STRICKLAND, RICHARD STRICKLAND JR		My husband's family has owned and lived on this property for over 60 years, and there are parts of our own land that are now in agriculture which we could develop into residential sites for our children in the future. However, 160/180- foot lattice towers within 1/4 mile would ruin those views and those property values well into the future. There ARE other alternatives for this line besides destroying the value of private property! BLM should NOT be allowed to devalue our property by choosing private property for the proposed transmission line.	A 500 kV line within 0.25 mile of your property would affect the view; however, the new line is proposed for the south side of the existing line, and your property is on the north side. The view would still be affected, but somewhat less than if it were closer to your house. The EIS does include alternatives for Segment 8; refer to Chapter 2 for a discussion of these alternatives. See Section 2.4.1.1 for the reasons that the Preferred Route was identified.
100893	JOHN BARSNESS, EDDY PETRANEK		I am voicing my concerns over the routing of the power lines over an area commonly known as "Test Hill", south of the home of Frank and Lorna Gillette located at 903 East, 500 South, Declo, ID. This hill is very important for hang gliding and paragliding flight training in the Southern Idaho region. The hill is uniquely situated to offer a safe training environment for beginner pilots, and also offers an accessible venue for other pilots to fly. I am strongly opposed to placing powerlines in the vicinity of this hilltop.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100894	KELLEY PHILLIPS, MARC PHILLIPS		We live just outside of Kuna near the crossroads of Cloverdale and Kuna Mora Rd. We feel very strongly that the transmission line should not go through our area. During the winter and early spring months there are hundreds of thousands of wild ducks, Canadian, White Fronted and Snow Geese that congregate in this area feeding on the farmers corn fields. During the early evening hours we have watched the wild birds coming into this area from all directions. They form into a giant flying funnel of birds, taking turns going to eat in the fields where there are so many of them that they blacken the field. We are very concerned about the implications of this power line in the wildlife.	Your opposition to the Preferred Route for Segment 8 is noted. Effects on birds are discussed in Section 3.10. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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100895	DAVE ALLEY	A LAZY DOLLAR LAND AND LIVESTOCK	I would like to endorse option 9D, already chosen by Owyhee County.	Your support for Alternative 9D is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100895	DAVE ALLEY	A LAZY DOLLAR LAND AND LIVESTOCK	Before moving to Oreana, I owned a farm (and managed 2 other ranches) crossed by the current line. Many of the problems cause by the lines + right of way issues, have been addressed. These include, grounding of fences, building restrictions, irrigation issues, inspection + repair crew access, and many, many, unintended factors, caused by crossing private properties. The operations in the Melba area, allowed me to observe, "Bird of Prey" use of current towers for nesting + hunting sites (not good for sage grouse in Owyhee County). The BLM preferred route seems like a "scam" to force Idaho Power (paid by customers) to pay for enhancement to the "Birds of Prey" program. This from a B.L.M. representative at the Murphy informational meeting. It's wrong to force, private property owners to change their lives and give up property, when better options are available, I oppose BLM's preferred option. Please, consider the impact, in human terms, on residents who will have to live with this lines, over their heads, in their yards, forever!	The analysis does consider the impact on people. The Preferred Route for segment in the Oreana area (Alternative 9E) was revised to avoid private land where feasible. Approximately 95 percent of Alternative 9E is on public land, the same as the County's preferred route. Both routes cross 3.3 acres of private land.
100896	OPAL WARD		I would like to endorse Segment D for the proposed Transmission Line Project route. This route is the one that makes the most sense. It parallels an existing line and a road. It will be the least invasive to property owners and to the environment. This area depends on the farmers + ranchers, as does our Country. Humans should be at least - if not more - important than critters + plants. Most of the property owners go out of their way to help the environment. Please let the citizens continue to have input as you continue to work on this project. We live here. We care. This affects us and our children's future. I live here, my son + daughter in law lives here, my grandson + his wife live here and my four great-grandchildren live here. Please consider if this was happening to you in your backyard.	It is not clear which segment this refers to, as Segments 5, 7, 8, and 9 all have D routes. We are assuming the comment refers to 9D; If this is the case, please note that both Alternative 9E and Alternative 9D cross the same amount of private property (3.3 miles) and neither route is within 1,000 feet of a residence. Alternative 9E crosses slightly less agriculture land. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100897	MARK STREATAR		This line is for the public and should be on public land as much as possible. Other transmission lines our going to want to follow the same route which will have a major effect on Cassia County in the future. I know this is not the BLMs problem but I feel it should be considered.	Your support for placing the line on public land is noted. The reasons the BLM selected the Preferred Route are discussed in Section 2.4.1.1.
100897	MARK STREATAR		I think that underground technology is growing rapidly and should be considered for future transmission lines.	The reasons the line was not placed underground are discussed in Section 2.6. The BLM concluded that it could not require this option due to the much greater ground disturbance (see the figures in Section 2.6) and the much greater cost.
100897	MARK STREATAR		Cassia County worked hard to make a transmission corridor for these lines, but it was not considered because birds rate above homes, families and farms. I feel this is wrong.	The corridor recommended by Cassia County was considered in the EIS. Refer to Section 2.4.
100897	MARK STREATAR		This line should go north on the river in MiniDoka County on the dessert with the other power lines. I know there is a pinch point below	Your support for placing the line north of the river is noted. Refer to Section 1.3 for a discussion of reliability criteria.

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			Cuaters or the Moon and the river, but WEK is allowing ines to be placed closer together then they were when this project started. This is a much better place for power lines then through populated areas and farms. I know tires and smoke are a concern but I feel with planed grazing this concern could be lessened. I would like to see Gateway and the Blm investigate this option.	
100898	LONNIE AND LYNNE SVEDIN		My name is Lonnie Svedin, and myself and my family live on a farm in Melba, Idaho. Our residence currently resides in the proposed route segment 8 of the Gateway West Transmission Line Project. I am writing to implore you to changing this route to the Alternative 8B segment, which would avoid our residence and many other private homes and land in the Melba Valley.	Your support for an alternative that does not go through Melba is noted. Refer to Section 2.4.1.1 for the reasons 8B was identified as the Preferred Route. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100898	LONNIE AND LYNNE SVEDIN		Inorder to avoid public ground, the current proposed route would directly cross over our ground, or cross directly adjacent to our residence. There would be built a 500 Kv double circuit lattice steel tower on or adjacent to our property. We feel this will not only severely depreciate the value of our home due to obvious aesthetic reasons, but more importantly, we feel it is potentially hazardous to our family's health and hte outcome of milk production that our dairy cows will produce. My wife and I have 3 boys that range from the ages of 8 to 14 years, and we cannot in good conscience expose them to such a close proximity of these dangerous magnetic fields. Although Idaho Power and the BLM claims there are no definitive studies in the U.S. supporting these health hazards, there have been many cases of sicknesses, infertility in humans, and growth hinderance in children, associated with these types of towers being present in close proximity, throughout the world. My wife is a healthcare provider, and unless there are proper studies conducted that show absolutely no ill-effects on humans, we will not live so close to these towers. Consequently we are very concerned over this matter, because we will not be able to sell our home at a fair price, if even at all, due to the decrease in property value. This would result in us having to move from a community we love and potentially being ruined financially.	The proposed line is a single circuit, not a double circuit. Effects on health are documented in Sections 3.21 and 3.22. The effect on property values is included in section 3.4.2.2. This discussion focuses on property crossed by the transmission line. However, one study found that properties within 50 feet of a transmission line have property values that are 6 percent to 9 percent lower than the values of comparable properties. It also found that this reduction in value tends to decrease over time. A recent study in Montreal found that direct views of a transmission line tend to reduce residential property value by roughly 10 percent (Des Rosiers 2002). Other studies found lower effects on property values.
100898	LONNIE AND LYNNE SVEDIN		In addition, our lovely Melba Ccommunity would be aesthetically tarnished, which having been born and raised in Melba, will be very hard to witness.	Your concerns about adversely affecting Melba are noted. The BLM will continue to work with local interests to search for a consensus route.
100898	LONNIE AND LYNNE SVEDIN		My wife and I feel that the alternative 8b segment is an excellent alternative route. It contains a lot more ground that is sparsely populated and affects less private citizens. After speaking with Walk George on May 9, 2013, we learned that even though this route covers part of the birds of prey conservation area, these towers were not found to be detrimental to this area. He said that Washington D.C. showed no studies that showed that these towers would enhance the Birds of Prey area, and therein lies the problem. Having lived across from the Birds of Prey area most of my life, I have witnessed many birds, Hawks in	Note, Alternative 8B is the Preferred Route, not the route that crosses through the middle of the NCA. The route through the NCA would require ground disturbance and new access roads. The BLM found that the proposed mitigation and EPM measures provided for the routes through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM is required to follow the laws. The BLM will continue to work with local interests to search for a consensus route.

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			Particular, who have built nests atop current power line towers, and have noticed no ill-effects, and actually feel it has proven beneficial. Due to all of these important concerns please consider our livelihood in your final decisions.	
100899	ERIC FORSGREN		I am writing in regard to the Gateway West Transmission Line Project and its proposed route thru Canyon Country Idaho. The BLM has proposed that this particular portion of the route run thru private land rather than the Birds of Prey area. BLM has proposed this route despite the objections of citizens, communities, and Idaho Power. The only response that I can tell is that BLM is concerned that running the Line thru Birds of Prey would negatively impact such Birds by harming the small mammal population. I have lived here my entire life and have not seen any reduction but have seen an increase. The proposed line could follow existing lines thru the Wildlife area. reducing impact. to small mammals. I have seen many birds of Prey nesting in existing lines. I believe new lines would be used in much the same way. If the route ran thru private lands as BLM has proposed, it would impact families that have farmed that land for generations. It could also affect the economy of the area if these families were no longer able to farm. Running these lines thru private land is a bad idea. Please consider following Idaho Power, community input, and general citizen feelings and route the lines thru Birds of Prey. Thank you.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project. Refer to Sections 3.4 and 3.18 for effects to farms, and also see Appendix K.
100900	RUTHE HOBBS		1. If this project is accomplished with overhead lines it needs to be on public lands to the south of the proposed route.	Your support for placing the line on public land is noted. The reasons the BLM selected the Preferred Route are discussed in Section 2.4.1.1.
100900	RUTHE HOBBS		2. The main economy of this area is agriculture. To put these lines through agricultural land when the project could go through public land is wrong. It is possible to put these lines in without impacting agriculture. Just because the BLM is using bogus issues such as "sage grouse" to prevent the use of public land doesn't make it right to use private land.	Adverse effects to sage-grouse are not a "bogus issue." The USFWS has determined that the species warrants listing under the Endangered Species Act. The law requires that the BLM not approve actions that contribute to a species being listed. Refer to Sections 3.4 and 3.18 for effects to farms, and also see Appendix K.
100900	RUTHE HOBBS		3. If the lands must go through agricultural land they should be put underground. This technology is in use in Europe and should be an option here	The reasons the line was not placed underground are discussed in section 2.6. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in section 2.6) and the much greater cost.
100901	RICKEY AND LINDA POLLARD		I have reviewed your information and considered this from several view points. I formed my opinion based on the good of the community involved, the good of the public & public lands, the good of the wildlife involved, and, of course, my good. I believe that ALL would be best served by using Route #9, D, F, G, H. The birds (of prey & others) sit on power lines all of the time & will not be harmed by this project. They nest on power poles. Failing in that, the only other route that could be considered reasonable for all those involved is Route #9E. I do not like it but it is all that is left.	The FEIS acknowledges that raptors roost and nest on poles. The route through the NCA would require ground disturbance and new access roads which do not enhance the NCA. The BLM found that the proposed mitigation and EPM measures provided for the routes through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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100901	RICKEY AND LINDA POLLARD		The "proposed route" is intollerable.	Your view of the Preferred Route is noted.
100901	RICKEY AND LINDA POLLARD		I have lived in this same are all of my life. There are no Sage Grouse, and have never been any, in the area of route #9D, F, G, H. They DO NOT winter there and they do not live there in the summer. Please. use your heads & put this line where it causes the least impact to the people who use & pay for power. The home owners, farmers, ranchers, and business owners pay for these lines; help us.	The issue for Alternative 9D, etc., is not sage-grouse. It is meeting the enhancement requirements of the enabling legislation of the NCA, as stated in section 2.4.1.1, and elsewhere in the EIS.
100902	ELLEN KAYE SVEDIN		I have a 160 A farm and a house I Live in on the Farm. I live across the road from one alternative rT. This Farm is for my living as I get older. I am 74 now if the lines go so close to my Farm I will not be able to sell the Land. We milk cows on sight. Cows and power lines don't get along.	We are not clear what the comment means by "alternative rT." This does not match any for the alternatives considered in the analysis. In any case, your concerns about how the transmission line would affect cows and farming are noted. Refer to Sections 3.4 and 3.18, as well as Appendix K for the analysis of effects on agriculture.
100902	ELLEN KAYE SVEDIN		I Fill it would be best To go by The exesting power lines. I live on the south west side of Robinson Rd Kuna and south of Kuna cave Rd.	Your support for placing the lined next to existing lines is noted.
100903	KELLY MURPHEY	MURPHEY FARM	My primary interest has been segment 9. Specifically the portion from just above Lilly Grade to just below Balanced Rock Park! The preferred alternative to the north side of the Salmon Falls Creek Canyon defies logic. The proposed route to the south of Salmon Falls Creek Canyon is an excellent choice. It impacts little to no private ground and allows future lines with minimal impact. The south route was proposed collaboratively and has broad support in the Castleford vicinity.	Alternatives 9B and 9C are follow the northeast side of the creek. The Preferred Route does not; it crosses the creek at Lilly Grade and continues south of the creek.
100904	JAMES HOWARD		The BLM preferred alternative (segment 9E) has a negative impact on this property.	Noted. Both Alternative 9D (the County's preferred route) and Alternative 9E cross 3.3 miles of private property.
100904	JAMES HOWARD		Above the Hart Creek canyon, I constructed an airport to serve the ranch and those who take an interest in back country flight. The missionary aviation fellowship (MAF) located in Nampa, Idaho has been granted use of the strip to train their pilots to land on short unimproved runways. They use it almost weekly. The power line will impact the safe operations of aircraft into and out of the landing strip. This is a very active strip used by the MAF, Top Fun Flyers and the Experiment Aircraft Association out of Nampa, Idaho.	Your use of this airstrip is noted.
100904	JAMES HOWARD		Segment 9E is truly a blight on an otherwise spectacular ecosystem of Hart Creek and to those who enjoy it. On the wall of my dwelling, that is near Hart Creek, is a poster given to me by the BLM. The title is "Taking the Path Less Traveled" it is magnificent photo by local photographer Mark Lisk. It is a photo taken in the canyon lands of the Owyhee's, at the confluence of Deep Creek with the Owyhee river. The photo celebrates 10 years of the National Landscape Conservation System (NLCS). The BLM thought the scenic value of this area was worthy of protecting, by their actions. A 180 foot high power line in the background would have been a tragedy. I feel the areas of Little and Big Hart Creek, with its green belt and majestic waterfalls that flow down the basalt notches during the spring runoff, deserves the same consideration.	Your opposition to Alternative 9E is noted.

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100904	JAMES HOWARD		Segment 9D is an existing corridor that has multiple power lines. I fly over this corridor on my way to the ranch. This route parallels the existing high voltage line and newly constructed road in the Snake River Birds of Prey. Morley Nelson worked tirelessly in protecting the Birds of Prey and found that properly designed power distribution systems have limited impact on the birds of prey and provides an opportunity for a nesting platforms built into the towers. Locating the line in this corridor saves the pristine landscape of the Owyhee front with little impact on the birds. Please do the right thing and place these lines in the existing corridor 9D	Alternative 9D follows an existing line for approximately 9 miles but then turns west and would not be adjacent to any existing lines for several miles. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100905	KATHY ALDER, CRAIG L. HANSON, STEVE RULE	CANYON COUNTY, BOARD OF COMMISSIONERS	The BLM's preferred alternative route would disrupt farming and other agricultural land uses which are the heart of Canyon County's economy.	Your concerns about how the transmission line would affect cows and farming are noted. Refer to Sections 3.4 and 3.18, as well as Appendix K for the analysis of effects on agriculture.
100905	KATHY ALDER, CRAIG L. HANSON, STEVE RULE	CANYON COUNTY, BOARD OF COMMISSIONERS	In addition, the route would negatively impact the Snake River Canyon Scenic Byway.	Section 3.17 discusses scenic byways, including the fact that the preferred route crosses the Snake River Canyon Scenic Byway.
100905	KATHY ALDER, CRAIG L. HANSON, STEVE RULE	CANYON COUNTY, BOARD OF COMMISSIONERS	The BLM preferred route is inconsistent with the following policies in the adopted Canyon County Comprehensive Plan: Preserve agricultural lands and zoning classifications. Protect agricultural operations and facilities from land use conflicts or undue interference created by existing or proposed residential, commercial or industrial development. The BLM preferred alternative route will cut a swath through agricultural land north of the City of Melba and along State Route 45. A 2009 study from the University of Idaho estimated that as land is transformed from agriculture to other uses the Canyon County economy may decline at approximately \$16,000 per converted acre.	Your comments on the Canyon County Comprehensive Plan are noted. Only the land under the towers (spaced approximately 1,500 feet apart) and a small area on each side would be transformed to another use; although there would be adverse effects on a somewhat wider area depending on the tower placement. See the diagrams and text in Appendix K and Figure 3.18-2 in Section 3.18 of the FEIS. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100905	KATHY ALDER, CRAIG L. HANSON, STEVE RULE	CANYON COUNTY, BOARD OF COMMISSIONERS	The BLM preferred route is inconsistent with the following policies in the adopted Canyon County Comprehensive Plan: Encourage beautification along transportation corridors and scenic-byways entering Canyon County. The BLM preferred alternative route will cross the southern terminus of the Snake River Canyon Scenic Byway, seriously damaging the scenic values for which it was designated and reducing tourist interest in Canyon County. In October 2007, the Idaho Transportation Department granted official state byway designation, and it is the only Idaho byway with a focus on agriculture. A corridor management plan was subsequently developed by a committee of interested citizens, agencies and municipal representatives, and was approved by the Canyon County Commissioners in March 2010.	Your comments on the Canyon County Comprehensive Plan are noted. Section 3.17 discusses scenic byways, including the fact that the Preferred Route crosses the Snake River Canyon Scenic Byway.
100905	KATHY ALDER, CRAIG L. HANSON, STEVE RULE	CANYON COUNTY, BOARD OF COMMISSIONERS	The BLM preferred route is inconsistent with the following policies in the adopted Canyon County Comprehensive Plan: National Interest Electric Transmission Corridors: Promote the coordination of providers to develop plans for energy services and public utility facilities for the long-term energy and utility needs of Canyon County. Minimize	Your comments on the Canyon County Comprehensive Plan are noted.

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			negative impacts. Site utility facilities in conformance with the Land Use element of this Plan. As the BLM preferred route will negatively impact areas designated as Agriculture in the Canyon County Comprehensive Plan, the route is not considered in conformance with the land Use element of the Plan.	
100905	KATHY ALDER, CRAIG L. HANSON, STEVE RULE	CANYON COUNTY, BOARD OF COMMISSIONERS	The BLM cannot ignore the input of property owners, citizens and other stakeholders who previously dedicated over two years to collaborating on an alternative route. On behalf of the people of Canyon County we request that the BLM reconsider its preferred alternative route for the Gateway West Transmission line and work with your office and other state and local officials to rectify the problems posed by the current route. We hope that we can return their support to a collaborative route that better serves the interest of Idaho citizens.	The BLM has not ignored input from property owners and local officials. It has worked to obtain consensus for the past several years. However, the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. Therefore, it could not adopt the route preferred by the county and local citizens. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100910	ERICK ESTERHOLDT, BRENDA LAZCANOTEGUI	LINCOLN CONSERVATION DISTRICT (WY),	The Lincoln Conservation District (LCD) board members reviewed the Final Environmental Impact Statement for the Gateway West 230/500 k V Transmission Line Project in Idaho and Wyoming and the final Land Use Plan Amendments at their monthly board meeting on May 28, 2013. Board members were mainly concerned about the proposed transmission line through the Town of Cokeville, Wyoming, vicinity. The proposed BLM Preferred Alternate, Segment 4, the red on the attached map, which goes just north of the existing transmission line, appears to be the best option, especially if the transmission line can be buried south of the Town of Cokeville. It is important that the proposed transmission line be buried for several miles so Cokeville residents will not have any more health or view shed concerns than what they experience now. This has been brought up at several public meetings with no avail or concern by project planners.	Your concern with the route near Cokeville is noted. The BLM has continued to work with local interests to search for a consensus route; refer to the ROD for more details. Please note that siting and permitting the line on private land in Wyoming is a state issue, not a federal one.
100910	ERICK ESTERHOLDT, BRENDA LAZCANOTEGUI	LINCOLN CONSERVATION DISTRICT (WY),	The LCD has also been contacted by the Town of Cokeville mayor and the Office of Planning and Development Lincoln County, Wyoming, about a proposed re-route of the transmission line, shown in black on the attached map, tying into Alternative 4 C transmission line. This would seem like a viable option which would eliminate the Town of Cokeville concerns totally. The board members would support this proposed re-route as a secondary option if the proposed segment 4 line could not be buried through the Town of Cokeville.	The BLM has continued to work with local interests to search for a consensus route. Please note that siting and permitting the line on private land in Wyoming is a state issue, not a federal one; however, crossing through core sage-grouse habitat outside of the governor's corridor as the city has proposed is not consistent with the governor's sage-grouse policy.
100910	ERICK ESTERHOLDT, BRENDA LAZCANOTEGUI	LINCOLN CONSERVATION DISTRICT (WY),	The LCD is definitely against alternative 4 F on the attached map which causes extreme concerns for agriculture operations in the Pine Creek area. The blue line alternative option, south of the existing power transmission line on the attached map causes big concerns for the proposed Sublette Creek Irrigation Water Development Commission and local residents. The LCD supports the need for supplemental irrigation water for district cooperators, thus this alignment would not be feasible.	Alternative 4F is not the BLM's Preferred Route.
100911	IVAN PERMANN		Power line needs to go on government (BLM) ground.	Your support for placing the line on public land is noted.

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100911	IVAN PERMANN		Underground lines need to be studied. If underground lines are used - it would solve a lot of problems - the lines could go anywhere.	Your support for placing the line underground is noted. Refer to Section 2.6 for a discussion of this option.
100911	IVAN PERMANN		This powerline helps no one in this area - we get no use of any of the power - it all goes down the line to the highest bidder, but we suffer in our livelihood by going thru productive field and by family homes. When a person asked about compensation for the ground and disruption of their business - they are ignored. Fair compensation for the length the line is on your ground in a yearly amount. It works for the reservations - it should work for the people who actually pay taxes.	Compensation of effects to private property is a state issue; permitting the line on private property in Idaho is under county authority. The BLM only grants the ROW on federal lands. Note that the new lines would be part of the national grid. Local power is provided via this grid.
100911	IVAN PERMANN		To study the underground line is what is needed. You try to farm around power lines and you would change your mind in a big hurry. Underground study! Yes	Your support for placing the line underground is noted. Refer to Section 2.6 for a discussion of this option. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
100912	OPAL WARD	CITY OF GRAND VIEW CITY COUNCIL	As a representative of the City of Grand View, I would endorse Segment 9D as the proposed Gateway West Transmission Line Project Route. This route parallels the existing 138 KV Idaho Power line in the Snake River Birds of Prey area. This is the Boise District office of the BLM preferred Alternative in February, 2012. This is the proposal accepted by the Owyhee County Commissioners, the citizens of Owyhee County and the citizens of the town of Grand View	Your support for Alternative 9D is noted. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100912	OPAL WARD	CITY OF GRAND VIEW CITY COUNCIL	All other lines will be a hinderance on farming + ranching operations	Your concerns about how the transmission line would affect cows and farming are noted. Refer to Sections 3.4 and 3.18, as well as Appendix K for the analysis of effects on agriculture.
100912	OPAL WARD	CITY OF GRAND VIEW CITY COUNCIL	when the BDO BLM identified 9D as their preferred route: Feb. 27, 2012 ; there was a 100% consensus from groups all over the state - including Idaho State Representatives, Gov. Butch Otter, the 1st congressional District, Idaho power and others	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100912	OPAL WARD	CITY OF GRAND VIEW CITY COUNCIL	Segment 8 proposed route is back onto private property. Alternative 9E has been altered at the edge of Oreana and now crosses private property.	The comment is correct in that the Preferred Route for Segment 8 crosses private land. The majority of Alternative 9E is on public land. Approximately 95 percent of 9E is on public land, the same as the County's preferred route. Both routes cross 3.3 acres of private land.
100912	OPAL WARD	CITY OF GRAND VIEW CITY COUNCIL	Segment 9E would have a high level of impact on the Sage Grouse.	Alternative 9E generally avoids preliminary priority habitat (PPH) for sage-grouse but does cross general habitat.
100912	OPAL WARD	CITY OF GRAND VIEW CITY COUNCIL	Our town depends on the surrounding farms + ranches. We support the route that has the least impact on private property and the environment. This route is Segment 9D! Please use a phased decision process and allow us to have input on this process.	Alternatives 9D and 9E both cross 3.3 acres of private land; the remaining area crossed is public. Your support for a phased decision is noted.

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100913	RYAN HAWKER		I have reviewed the information with respect to Segment Seven and Cassia County. I believe the best siting for this in Cassia County is the 7K alternate route. this is a route after consideration of county that we have chosen to be the best for the resident. It also gives room for added lines. Better yet keep them all north with Section 6.	Your support for Alternative 7K, and for keeping the route north with Segment 6, is noted.
100913	RYAN HAWKER		To put the health and safety of the resident of the county secondary to the Sage hen is an atrocity. It does not take long to find plenty of information on the detrimental effects these types of lines have on humans and animals	Refer to Sections 3.21 and 3.22 for effects on health.
100913	RYAN HAWKER		To waive the request of the County official and the work that has gone into finding an acceptable route is just wrong. It brings out the inconsistency of the proponets of the Gateway Project and the BLM.	Your comments about the process are noted. The reasons that the BLM could not support the county's route (Alternative 7K) are listed in Section 2.4.1.1.
100913	RYAN HAWKER		To forever impair the use and enjoyment of ones land and inhibit the ability to farm or use it in the customary way is just plain wrong.	Your comments on impairing the use and enjoyment of one's land are noted.
100913	RYAN HAWKER		If it costs more to go around this populated area then is still what needs to be done.	Your comment on costs is noted. We assume it refers to the additional \$60 million or more that Alternative 7K would cost to build.
100913	RYAN HAWKER		Another thing that comes to mind is if I recall correctly this power plant near Casper WY is a coal fired plant. So not this administration trying to phase out Coal use for power? Have not heard this issue addressed. Are we taking power from the Northwest to replace it? If so, it is not in the best intent of the Northwest to support the line at all.	Power could come from coal, or from wind and other sources, as noted in Chapter 1. Power could also come from the Northwest hydropower, since the grid is a national resource.
100913	RYAN HAWKER		In short, I feel if this line is to come through Cassia County, it should be in accordance to where the county feels and determined it is best for the County and residents of the County. This route is alternative 7K the impacts to the Sage Hen is less rlean it is to the health and welfare of the Heeman residents of this County.	Your comments about the process are noted. The reasons that the BLM could not support the County's route (7K) are listed in Section 2.4.1.1.
100914	GENE BORN, POLLY BORN		Travel the shortest distance to sub stations, stay off military property, get permission to cross Indian reservation. If needed cross the BLM land (we own it) and wildlife area's. I have been around transmission line crossing range land's + mountain's and these people know what they are doing, they leave a clean path, nice.	Your solutions sound like good advice; however, the shortest distance between substations generally crosses agricultural lands and residences in the path. As stated in Section 2.4.1.1, "in October 2012, the Tribes notified the BLM that they no longer wished the alignment crossing the Fort Hall Indian Reservation to be considered for the Project. The BLM lacks the authority to grant a ROW on tribal lands or any lands other than those prescribed by law. Federal law (25 U.S.C. §324) provides: "No grant of a right-of-way over and across any lands belonging to a tribe organized under the Act of June 18, 1934 (48 Stat. 984) [25 USCS § § 461 et seq.], as amended; the Act of May 1, 1936 (49 Stat. 1350); or the Act of June 26, 1936 (49 Stat. 1967) [25 USCS § § 501 et seq.], shall be made without the consent of the proper tribal officials." The Fort Hall Reservation was organized under the Indian Reorganization Act of June 18, 1934. By law, the BLM must protect listed species and not permit actions that could lead to listing of a species such as sage-grouse.

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100915	ELVIN LEO & UNA CLOYD		We have an existing powerline going thru the Birds of Prey Area now and I see no reason not to parallel this existing line. It would have very little additional impact to the sage brush desert. I have visited with Morley Nelson while he was alive and he had high praise for Idaho Power's work protecting the habitat for his bird friends.	The routes through the NCA would require thousands of acres of ground disturbance and miles of new road. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100916	GEORGENE MOORE		I strongly Support Segment 8 and 9D.	Your support for Segment 8 and Alternative 9D are noted.
100916	GEORGENE MOORE		oppose the "BLM Preferred Routes Seg. 8B & 9E - and Segment 9 - which are in the final EIS statement	Your opposition to BLM Preferred Routes Alternative 8B, Alternative 9E, and Segment 9 are noted.
100916	GEORGENE MOORE		The Morely Nelson Birds of Prey Area is wonderful to have, however, when the land was set aside for it, they said NO restriction to the Public would come about - There have been many Restrictions implemented The birds won't care if they have mroe perches for hunting.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100916	GEORGENE MOORE		The Morely Nelson Birds of Prey Area is wonderful to have, however, when the land was set aside for it, they said NO restriction to the Public would come about - There have been many Restrictions implemented The birds won't care if they have mroe perches for hunting. After the Kuna fire several years ago, the birds have widened their hunting range. Birds go where the food is. Don't worry about the birds. Worry about the human and the econmic health of hte area. Farming/Dair is the lifeblood.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100917	WADE POVEY	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	My name is Wade Povey. I am a farmer in Power County, Idaho and the co-Chair of the Power County Gateway West Citizens Task Force. I have farmed around high voltage transmission lines for many years, as did my father-in-law. I know firsthand that trying to work around electric towers and high voltage lines is an extreme hardship, and the size of the new Gateway West proposed transmission towers will make it impossible to farm.	The EIS acknowledges that transmission lines make farming more difficult; see Appendix K, as well as Sections 3.4 and 3.18. The reasons for selecting the Segment 7 route are included in Section 2.4.1.1 of the FEIS.
100917	WADE POVEY	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	I was very enthused when our task force proposed the possibility of burying the transmission lines, as that would resolved many problems. I was extremely disappointed by the BLM's decision not to analyze the possibilities of burying the lines, and continue with the old, outdated method of just simply erecting big towers, particularly on private property.	Refer to Section 2.6 for a discussion of the impacts associated with buying a 500 kV transmission line. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.

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100917	WADE POVEY	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	Our task force is adamantly opposed to the BLM's decision to place 80% of Segments 5 and 7 on private property. Pushing the line onto someone else's property does not resolve the problem, it just transfers it. Power County residents have farmed their land for many generations, and wish to continue doing so.	Your opposition to placing the lines on private lands is noted.
100917	WADE POVEY	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	Power lines and modern agriculture do not mix well together. An important part of modern agriculture is aerial application or "crop dusting". Crop dusting is essential for many reasons. I personally have witnessed 3 airplane accidents involving transmission lines, which accidents left 6 people dead. Crop dusters will not apply the chemicals in the areas of power lines. I have already had to aerially apply fungicides to over 1,000 acres this year. My entire crop could be destroyed without the option of aerial application. There are many like me that will be impacted by this line. We must be able to crop dust or our farms could become worthless.	The EIS acknowledges that transmission lines make farming more difficult; depending in part on where the towers are placed. See Appendix K, as well as sections 3.4 and 3.18. The reasons for selecting the Segment 7 route are included in Section 2.4.1.1 of the FEIS. Note that page 10 of Appendix K discusses aerial crop spraying under Soil Compaction.
100917	WADE POVEY	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	The BLM has ignored our interests and our expertise. This is not right. The BLM should be working to find a solution, not ignoring the wishes of the citizens. There is nearly unanimous opposition in our task force to the BLM's preferred alternative for segments 5 and 7, and yet the BLM considers themselves to be ultimate dictator. The BLM has made a decision they should be ashamed of. It is not yet too late to try and correct this mistake.	The BLM did consider the task force input, along with other input. See Section 2.4.1.1 for the reasons the BLM chose the Preferred Route for Segments 5 and 7.
100918	RICHARD FARNER, BRYCE D MILLAR, DICK SMITH	NAMPA HIGHWAY DISTRICT #1	We strong oppose the Alternative 8B route for the proposed Gateway West Transmission Line in southern Idaho.	Your opposition to Alternative 8B is noted.
100918	RICHARD FARNER, BRYCE D MILLAR, DICK SMITH	NAMPA HIGHWAY DISTRICT #2	The United States should honor the preferred route that was originally negotiated together by federal, state and local government officials, and local citizens' groups. It runs through remote federal lands, including the Morley Nelson Birds of Prey National Conservation Area.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA given the thousands of acres of ground disturbance and the miles of new road that would be needed. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100918	RICHARD FARNER, BRYCE D MILLAR, DICK SMITH	NAMPA HIGHWAY DISTRICT #3	The Gateway West Transmission Line Project is a needed asset to our nation's commerce, defense and standard of living. Locating it through the Morley Nelson Birds of Prey National Conservation Area, as originally negotiated, poses negligible harm to birds, to our environment or to our society. The Alternative 8B route, however, locates it through private lands, which hurts our economy by taking land out of production, and exposes many more people to any potential safety risks. We insist you stand by the preferred rout as originally negotiated!	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.

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100919	PAUL BERGGREEN, BARBARA M CARROLL, PATRICIA CARROLL-CHEN, LLOYD CHAMPAGNE, MIKE CHEN, MICHAEL CHRISTENSEN, JUSTIN CHRISTENSEN, TRAVIS CHRISTENSEN, SHELLIE WILLIS, C DALE WILLIS JR, JOE ZOLDOS, KATHLEEN ZOLDOS	SNAKE RIVER RANCH, LLC	As a concerned property owners of 1,045 acres along the Snake River, within the corridor area, recently proposed to be arbitrarily amended in the Final EIS Report for the Gateway Transmission Line Project, We strongly oppose the "BLM preferred Routes" (segment 8B and 9E and proponent's proposed segment 9) as expressed in the Final Environmental Impact Statement.	Your opposition to Alternatives 8B and 9E is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100919	PAUL BERGGREEN, ET AL. (see preceding)	SNAKE RIVER RANCH, LLC	We remain determined to support our previous demand that the alternative transmission line be aligned consistent with the collaborative efforts of the power companies, various agencies and the public referred to as segment 8 and segment 9D.	Your support for the route through the NCA is noted.
100919	PAUL BERGGREEN, ET AL. (see preceding)	SNAKE RIVER RANCH, LLC	Upon review of the FEIS, it is very disconcerting to the partners of Snake River Ranch, LLC that many of the concerns related to the extent of the financial damages associated with the social and economic impacts that the proposed corridor will cause are not adequately addressed. Several of which include: •The complete demise of planned development opportunities; due to adverse living conditions created by 500kv transmission lines, with 150 to 180 foot towers and electric cables that buzz due to stray voltage. This loss will result in millions of dollars of lost revenue for, not only our company, but also city, county and state government.	Your comments on potential financial losses if the preferred route is selected are noted. Stray voltage is discussed in section 3.21. The electric field returns to near zero near the edge of the ROW (see Figure 3.21-4). Audible noise travels further in foul weather than in fair. The sound level at the edge of the ROW is approximately the level found in a living room (see Figure 3.21-8 and Table 3.21-10).
100919	PAUL BERGGREEN, ET AL. (see preceding)	SNAKE RIVER RANCH, LLC	•Detrimental effects to farmers in the area being hindered by the immense electrical towers rendering large areas of land useless and blocking pivot irrigation sprinklers, representing millions of dollars in costs, for farmers, to relocate those sprinklers.	The EIS acknowledges that transmission lines make farming more difficult; see Appendix K, as well as Sections 3.4 and 3.18. The reasons for selecting the Segment 7 route are included in Section 2.4.1.1 of the FEIS.
100919	PAUL BERGGREEN, ET AL. (see preceding)	SNAKE RIVER RANCH, LLC	•The loss of homes, buildings and other structures standing in the path of the planned transmission line route. Many of these structures have been in place for decades and represent generations of sacrifice and labor. The cost of re-locating, and or re-building these structures would impose an enormous financial and emotional burden on residents, farmers and other businesses existing in the area of the proposed transmission lines.	Construction of the line would not remove, or cross directly over, any buildings. The line would be micrositied to avoid structures. Note that setbacks on private lands (if the line is approved by the county and state) would be under the County's control, BLM only makes decisions on federal land.

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100920	RICHARD M CHASTAIN		As an adversely effected property owner in the Gateway right of way selection process, in particular area 8B, southern Ada County, I have attended the meetings, read the offered materials to include the final EIS in an attempt to learn why your agency persists in what is referred to as the "BLM Preferred Route." Regrettably, no logic is provided as to why the project would be better routed through a populated area, the future growth area of Boise City, causing increased right of way acquisition and construction costs, decimating property values, causing subsequent increased rate payer costs, and the opposition of all segments, both public and private, of effected Idaho citizenry; when to the south lies acres, miles of "nothingness" which can absorb the project without the negatives enumerated above.	The logic for recommending Alternative 8B over routes that cross the NCA outside the designated utility corridor is found in Section 2.4.1.1. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100920	RICHARD M CHASTAIN		Idaho is a bucolic wonder, one can, in a very brief time, be where no one has ever been, there is ample room for all, birds, bees, people, etc. Why a "bird" sanctuary was allowed to be placed in the path of a rapidly expanding city, when miles of alternative space was available will remain a question unanswered.	Your thoughts on Idaho are noted. Refer to Section 2.4.1.1 for the reasons the Preferred Route was identified.
100920	RICHARD M CHASTAIN		In the writers situation the BLM preferred route locates the line approximately one half mile to the north of said property's northern boundary rendering development plans an assured loss plus sharply and unnecessarily diminishing property values. Many area property owners are similarly effected. Legal recourse is a regrettable alternative, however, in light of the BLM position in this matter, it must be considered.	Your comment on the line hindering development of private property is noted.
100920	RICHARD M CHASTAIN		Listen to Idaho Power, they have to live here, and pay the grievous price of this error, Gateway has no logical or viable reason to trespass southern Ada County and disrupt the lives and enterprise of the folks who abide here, when there are preferable alternatives immediately available. Listen and adhere to common sense, people, taxpayers, rate payers come first. It's time for Gateway to get out of town.	Refer to Section 2.4.1.1 for the reasons the Preferred Route was identified.
100921	LARGE GROUP, NAMES LISTED in FOOTNOTE 2		We strongly SUPPORT segment 8 and segment 9D	Your support for Proposed 8 and Alternative 9D are noted.
100921	LARGE GROUP, NAMES LISTED in FOOTNOTE 2		We OPPOSE the "BLM Preferred Routes" (segment 8B and 9E and proponent's proposed segment 9) as expressed in the Final Environmental Impact Statement.	Your opposition to Alternatives 8B and 9E is noted.
100921	LARGE GROUP, NAMES LISTED in FOOTNOTE 2		1. Segment 8B and 9E (BLM preferred routes) would burden private citizens with costs of millions of dollars.	Your opposition to Alternatives 8B and 9E is noted; the cost of 9E and 8B would likely be greater due to their greater length.
100921	LARGE GROUP, NAMES LISTED in FOOTNOTE 2		2. Should the BLM's Preferred Routes come to fruition, the citizens and governmental authorities of Idaho's reached collaborative consensus would be turned back as meaningless by Washington DC.	While the BLM can reject the route in the NCA, it cannot permit the portion of the route on private land. In Idaho, the county has this authority. Therefore, the local government will be involved in any decision to build the line on private land.

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100921	LARGE GROUP, NAMES LISTED in FOOTNOTE 2		3. The "enhancement requirements" to Birds of Prey can be met within the construction processes of the project through the Morley Nelson Birds of Prey defined area.	Construction processes along will not meet the enhancement requirements. Additional mitigation will be needed, more than what was proposed at the time the FEIS was completed.
100922	THOMAS & PEGGY FRIDDLE		I don't feel it best to put those high voltage towers through residents property or on highly traveled roads such as Melba Road - Melment Road on Highway 45 State Highway 78. Put them through the Birds of Prey. The birds will adapt just like the owls did in Washington State when the lumber industry was shut down. The owls found new territory and have adjusted very well. I'm sure better than people will adjust to the Tower in our fields and roads.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100922	THOMAS & PEGGY FRIDDLE		Secondly, they will reduce the value of our farms and we do not need that in this economy. If the value of land is reduced will that reduce the tax base on each piece of personal property? Doesn't Idaho need all the tax money they can get?	The effect on property values is included in Section 3.4.2.2.
100923	BETTY HAMILTON		Please DO NOT run these lines across our private land. The Morley Nelson Birds of Prey area is much better suited for these types of lines.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100924	ANNA ROGERS		Please listen to the land and homeowners who live close to this route. We will have to live with this every day -	The BLM will continue to work with local interests to search for a consensus route.
100925	DON HAMILTON		Please support putting this line across the people's federal land along the agreed upon route through the Birds of Prey area.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100926	BOYD ANDERSON	BOYD & LOA ANDERSON LP	We are opposed to BLM's preferred routes going thru our (and many other citizens also) private property when an alternate route has been shown by our local authorities. What else can be done?	Your opposition to placing the route on private land is noted. The BLM will continue to work with local interests to search for a consensus route.
100927	GREGORY SANCHEZ		We strongly oppose the BLM Preferred Routes, because they disregard the Health and Quality of Life effected by the "people" living in the proposed AREAS.	Your opposition to the preferred route is noted. Refer to Sections 3.21 and 3.22 for a discussion of effects on health.
100928	WILSON R VOLLMAN, TERR Y VOLLMAN		The BLM's preferred routes are within 1 mile of our home, which we have diligently tried to maintain a country atmosphere for our three generations of family. The importance of the individual land owner HAS to come before the Birds or training ranges or roadless areas.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM must follow the laws governing lands that it manages, it will continue to work with local interests to search for a consensus route.

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100929		ANDERSON ENTERPRISES	This is an example of Washington bureaucrats going against local and state elected officials, and the citizens who own the private lands.	The NLCS staff were following the law governing management of the NCA.
100930	JERILL SJAASTAD		Just do the right thing for a change!	The BLM continually tries to do the right thing. In this case, many people believe the right thing is to cross the NCA while others, including several environmental groups in Idaho, oppose crossing the NCA at all, as the comments in this table attest to.
100931	CYNDY & MERRITT HARKER		For the people by the people!!!!	Noted.
100932	RICK & KRISTI MORINO		We think the comments + the wishes of the local people should not be ignored!!!! We live here - not in Washington D.C. Please listen to us local people. We are the ones who live here.	The BLM did consider the input from local people, along with other input. See Section 2.4.1.1 for the reasons the BLM chose the Preferred Route for Segments 5 and 7.
100933	CRAIG MOORE		The United States Government is supposed to be: Of the People By the People And For the People What happened to the BLM in this regard? The people spoke after months of deliberation and corroboration with Idaho Power Company as well as BLM Idaho and came to a consensus only to have that consensus thrown out by Washington, in what appears to be fear of reprisal from environmental groups over precedent setting.	The law governing the management of the NCA was passed by the Congress, which represents the people of the U.S. The BLM must follow the laws of the country. Adequate mitigation was not offered to meet enhancement requirements of the law at the time the FEIS was completed. The BLM will continue to work with local interests to search for a consensus route.
100933	CRAIG MOORE		Department of Interior and BLM in Washington, I would hope that you would take another look at the issues as set forth below. Since you set us up as a Phase decision status you certainly can do that with no difficulty. However, time is very important so please do not wait for weeks or months to settle this "easy to settle" issue before you.	The BLM will continue to work with local interests to search for a consensus route.
100934	ALICE & PAUL PLINE		Form Letter - 100921]	Your opposition to Alternatives 8B and 9E and support for Preferred 8 and Alternative 9D are noted. While the BLM can reject the route in the NCA, it cannot permit the portion of the route on private land. In Idaho, the county has this authority. Therefore, the local government will be involved in any decision to build the line on private land.
100934	ALICE & PAUL PLINE		We have a dirt landing strip - (grandfather in) that it would obvious affect.	Noted.
100935	SIDNEY SWAILS		With Segment 8B + 9E Construction and Such A High Cost + The High Cost of windmill Electricity which is unneeded would greatly Burden Idaho Residents to the point they may not Be Able To Afford it.	Noted. The Purpose and Need for the Project is discussed in Chapter 1.
100936	BEVERLY MORRIS		If you put the Gateway West Transmission Line within a half mile north of the town of Melba where there are many homes, it would be dangerous to the health of the people that live there.	Effects on health are discussed in Sections 3.21 and 3.22. Research reviewed for this EIS did not support the contention that the line would be dangerous to human health.
100937	JAMES SPENGLER		Form Letter - 100921]	Your opposition to Alternatives 8B and 9E and support for Preferred 8 and Alternative 9D are noted. While the BLM can reject the route in the NCA, it cannot permit the portion of the route on private land. In Idaho, the county has this authority. Therefore, the local government will be involved in any decision to build the line on private land.

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100937	JAMES SPENGLER		4. Section 368 of the 2005 Energy Act, instructs that these transmission lines are to be sited on Federal Lands following existing right of ways.	Nothing in this law mandates that transmission lines only be sited on federal lands. As the maps in Appendix A show, it is not feasible to only site the line on federal land.
100937	JAMES SPENGLER		5. This alteration without input is a violation of the national Environmental Policy Act (NEPA) a Federal Processing Law for all matters of this kind.	The NEPA was not violated. Changes to alternatives or to the preferred route between draft and final EIS are a normal part of the NEPA process; if this were not the case, there would be no point in publishing a draft, holding public meetings, and obtaining comments from agencies, local governments, and individuals.
100938	ELLEN KAYE SVEDIN		I support segment 8 and segment 9D	Your support for Segment 8 and Alternative 9D is noted.
100939	LAVAR THORNTON, LAYNE THORNTON		[Form Letter - 100921]	Your opposition to Alternatives 8B and 9E and support for Preferred 8 and Alternative 9D are noted. While the BLM can reject the route in the NCA, it cannot permit the portion of the route on private land. In Idaho, the county has this authority. Therefore, the local government will be involved in any decision to build the line on private land.
100939	LAVAR THORNTON, LAYNE THORNTON		We have owned + farmed more than 35 years in sec. 1 TIN RIW + Sec 6 to 7 in TINRIE and for over 10 years in Section 2 + 3 in TINRIE the proposed power line would go through or next to our property. We grow alfalfa seed, mint, wheat, corn, + sugar beets. We use aerial spraying. Our land has been annexed into the city of Kuna.	The EIS acknowledges that transmission lines make farming more difficult; see Appendix K, as well as Sections 3.4 and 3.18. The reasons for selecting the Segment 7 route are included in Section 2.4.1.1 of the FEIS. Note that Appendix K discusses aerial crop spraying.
100939	LAVAR THORNTON, LAYNE THORNTON		Several times a year I drive to Swan Falls and may only see a couple of birds. However, when I am combining alfalfa seed in Aug. + sept. there are as many as 50-60 birds of prey around. All through the year there are birds of prey to see over the developed land around us.	Your comments on birds' use of developed land are noted.
100939	LAVAR THORNTON, LAYNE THORNTON		The map shows the proposed line crossing the SEY4 of the SWY4 of sec. 2 TINRIE. The best route would be to stay on the section line.	The line in the FEIS is based on indicative engineering. The actual design will consider landowner recommendations, such as following the section line and property boundaries. Note that siting on private lands is under the authority of the County in Idaho. The BLM only makes decisions for federal land.
100940	RICHARD C WILLIAMS	C T PROPERTIES LLC	It is inconceivable to us that NO consideration has been given to the negative economic impact this project will have if the preferred routes are used. The negative impacts are disruption of agricultural lands, limitations on cities for expansion, loss of scenic views. There should be inverse condemnation claims for mitigate the loss of land values if the proposed routes are used.	Condemnation, if it occurs, is under the jurisdiction of the state courts.
100941	RICHARD C WILLIAMS	ROBINSON R I HONEY CO INC	This project has taken on a life of its own. The gov't wants clean energy, a pristine environment, less pollution, etc yet turns around and promotes the expansion of a coal fired power generator and transmission lines while electricity demand declines. This project is an expensive Boondoggle!	Energy demand is not declining.
100942	RODERICK HARTWELL, VICKI HARTWELL		Along the rim of the Snake River would be the most logical path. Check it out!	Your recommendation to site the line along the rim of the Snake River is noted.

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100943	GORDON L & NANCY A THOMPSON		I do not believe the federal/national officials of your agency should have totally ignored the agreement reached by the local task force for the route south & east of the Hemingway Butte substation. The local people are best able to determine what is best for that area. The transmission line should remain on the North side of the Snake River as much as possible and not be passing to the South through Owyhee County and crossing private land. As to objections to passing through the Birds of Prey area, there are power lines and roads already in existence through that area. If anything the new line would give the raptors a higher perch from which to survey for prey over a larger area. The Alternate route to the North of the river is the one that should be constructed.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100944	GORDON L & NANCY A THOMPSON		As to objections to passing through the Birds of Prey area, there are power lines and roads already in existence through that area. If anything the new line would give the raptors a higher perch from which to survey for prey over a larger area.	The issue involves the level of ground disturbance and new roads, not the perches. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100944	GORDON L & NANCY A THOMPSON		The Alternate route to the North of the river is the one that should be constructed.	Your support for a route north of the river is noted.
100945	PAUL MCCRACKEN		The big problem with this line is you want to go through my private property where there is plenty....plenty of room on both sides of me that doesn't have a residence, home and family living and residing on a small piece of land. I was told in the beginning that you wouldn't touch my property, however this seemed to have changed. I can't be more forward... DON'T PUT THE LINE ON MY PRIVATE PROPERTY, there is no need for it with 30+ miles to the north and 4-5 miles to the south.	Your opposition to a line crossing your property is noted.
100945	PAUL MCCRACKEN		P.S. My ranch is up for the National historic role, due to it's history with native american/ wagon trail	Noted.
100945	PAUL MCCRACKEN		I also have a natural wetland area around the ranch (14 mile reservoir) that draws numerous wildlife, birds and sage grouse	Noted; see Section 3.9 for a discussion of wetland protection.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	The FEIS is an extremely complex and lengthy document. It is a difficult task for professionals who deal with these documents regularly to wade through the data and make specific, meaningful comments. It is even more difficult, if not impossible, for ordinary citizens who are not familiar with the process and the technical aspects of a FEIS to analyze it sufficiently and prepare meaningful comments in a 60 day time period; particularly when they are busy earning a living and caring for their families. Therefore, we respectfully request that the comment period be extended for an additional ninety (90) days to allow those who are most affected by the potential route to have a better opportunity to fully review the document and provide input on the FEIS.	The BLM determined that 60 days was an adequate period; the BLM received many comments on the project in that period.

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100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Our members understand that the Bureau Land Management (BLM) only has the authority to select the transmission line routes on federal land. However, when the BLM grants right-of-ways on federally managed land, its decisions necessarily dictate, to a large degree, the location of the transmission lines on private property. This is particularly challenging when the BLM and other federal agencies are not consistent in the application of their own rules, regulation and guidance, as is the case with BLM's Preferred Alternative in several different segments across the state. Landowners do not have a clear understanding of what to expect as projects move forward.	We understand the frustration involved in planning large projects that cross multiple jurisdictions. We also find it difficult to meet all the concerns of the various interests and governments.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Clearly, residents of Owyhee County were shocked and upset when three years of collaboration and consensus building were thrown out the window by bureaucrats in Washington DC who decided they knew best about where the lines should be drawn than the people who live and work here in Idaho. The local consensus alternative 9D avoided crossing private land except where the landowners were willing to allow the power companies to purchase a right-of-way. This is a very important aspect that has been brushed aside in the BLM's analysis. Since only 17% of Owyhee County is privately owned, each and every time private property is negatively impacted it directly affects the local economy.	Alternatives 9D and 9E both cross 3.3 miles of private land. The BLM revised Alternative 9E between draft and final EIS to reduce impacts to private lands. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	The BLM's own analysis is contradictory and appears to be based on achieving particular results rather than on science and/or their own regulations. Throughout the FEIS, the BLM consistently seeks to avoid impacts in Sage Grouse habitat, until it comes to segment 9, where it suddenly reverses course and places the preferred alternative, 9E straight through Preliminary Priority Habitat for Sage Grouse. This is clearly done in an effort to prevent the project from crossing the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP), even though all locally interested parties, including the Idaho State Director of the BLM had concluded that alternative 9D was the best alternative.	Alternative 9E generally avoids preliminary priority habitat (PPH) for sage-grouse but does cross general habitat.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Route 9D is an advantage to the SRBOP raptor populations, as shown in the BLM's own studies conducted from 1981 to 1989. These studies conclusively proved that transmission lines provided enhanced opportunities for raptors to perch, nest and roost and the productivity of hawks and eagles nesting on transmission towers was as good, and in some cases better, than those nesting in natural environments. (Engel et al. 1992; Steenhof et al. 1993)	The issue involves the level of ground disturbance and new roads, not the perches. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Our members also favor alternative 9D as the route with the least impact on Sage Grouse, which we are working very closely with the Governor's Sage Grouse task force to protect, along with other stakeholders, so as to avoid it becoming a listed species under the Endangered Species Act.	The FEIS agrees that Alternative 9D would have less impact on sage-grouse; however, the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.

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100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Siting the GWTLTP through areas identified by Governor Otter's sage grouse task force as sage grouse habitat clearly flies in the face of the BLM's stated goal of avoiding sage grouse habitat	The issue involves the level of ground disturbance and new roads, not the perches. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Karen Steenhof, one of the biologists hired by BLM to study the effects of transmission lines through the SRBOP, has recently submitted to Carl Rountree, Director of NLCS the following comments: "A new transmission line in Owyhee County (9E) would attract raptors and ravens and could lead to increased predation on declining Greater sage-grouse populations. Golden eagles prey on adult Sage Grouse, and Common Ravens are a major predator of Sage Grouse eggs. Recently, Idaho State University (ISU) biologists have noted a dramatic increase in the predation of Sage Grouse by ravens. Where there are more ravens, nesting female Sage Grouse stay on their nests much longer, leaving less often. Less time foraging may casue "substantial physiological distress" on the Sage Grouse	The issue involves the level of ground disturbance and new roads, not the perches. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	. It would be better to attract raptors and ravens to cheatgrass areas in the NCA where they feed on ground squirrels than to the shrubsteppe areas inhabited by sage-grouse in Owyhee County."	While this is true, it does not change the situation. The proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Clearly, there are sound biological reasons to avoid routing the GWTLTP following the BLM's preferred route 9E	If a better route can be found, the BLM is very open to considering it. However, the fact remains, the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. Should the mitigation offered by the Proponents change, the BLM will review its decision to recommend Alternative 9E.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	while there are also compelling biological as well as local economic and property-rights reasons to return to alternative 9D.	Your comment that there are compelling biological as well as local economic and property-rights reasons to return to Alternative 9D is noted.
100946	JOHN RICHARD	OWYHEE COUNTY FARM BUREAU	Alternative 9D is supported by local landowners, sportsmen, Idaho state agencies, conservation groups, local elected officials, community leaders, interested citizens, state and local BLM offices, and other federal agencies. All of whom participated in a three year collaborative process that determined by consensus the routes that everybody felt would be in the best interest of local landowners, the local economy and both the wildlife and resources involved.	Your comments on local support for Alternative9D are noted.
100947	MATT MORRIS		item 3. the lines currently running through the area have not affected the birds. running an additional set of lines shouldn't either.	The issue involves the level of ground disturbance and new roads, not the perches. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9

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				routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100947	MATT MORRIS		Running lines through private land with homes will only weaken the already damaged property value.	The effect on property values is included in Section 3.4.2.2.
100947	MATT MORRIS		In addition to item 1, whatever the estimate amount is you should double it. the government cannot estimate construction projects.	The government has not estimated the construction cost, the power companies have. It is their proposal, not the BLM's. The BLM is not proposing or building power lines. See the Purpose and Need in Chapter 1.
100948	KATIE JESS		There are a dew historical sites in the area including a historic church, cabins, cemetery, dug outs and an Indian Cave. If this project were to go through it would destroy the whole community. In closing I encourage you to consider the massive negative impact this project would have on the whole community. Many families could and would lose their homes, again many of whom have been there for over 100 years. It breaks my heart to even think of losing my family's history, so much of my life and memories are tied to our ranch. Thank You	Your concern for historic properties is noted.
100948	KATIE JESS		The very idea of destroying this community in the name of progress" is disgusting to me. Ripping land away from families who have poured their blood, sweat, and tears is horrible. Specific to my family it would be taking away our heritage. We have been in the area for 100 years. For our family alone in would be affecting over 150 people. We have created a haven for all our family; we hold gatherings for all our family to feel safe and welcome. We had a family reunion with many generations, of Jess' gathered to share and enjoy our rich family heritage. This land is our past, our present, and our future. I can't and won't understand why the thought of destroying not only my family's heritage but a whole community is okay. Oreana may be a small community but it is rich in history and family. Most of the families living there have lived there or had family there for well over 50 to 100 years.	Your concern that the Project would destroy the community is noted. The analysis in the EIS acknowledges that there would be adverse effects in the area, but it does not support your statement that the community would be destroyed.
100949	CHRIS COLSON		Concerning the Six S Ranch, DU met with IPC engineers on behalf of the ranch owners to discuss realignment of the proposed routes through the ranch. The owners are willing to have the line cross the property, but they are opposed to the existing location. Realignment was proposed and generally accepted by IPC with the exception of any necessary micrositing. The realignment agreed upon by IPC is presented in. DU is opposed to the current location of the route and supports the realignment presented in.	The line shown in the FEIS is based on indicative engineering, it is not the designed route. The BLM expects that the Proponents will work with landowners to microsite the route based on discussions with landowners and the County.
100949	CHRIS COLSON		Additionally, the landowner of Spring Cove Ranch participates in Idaho Fish and Games 'Access YES!' program. By participating in this program, the landowner allows members of the public to access their property to hunt and fish. For this reason, Spring Cove Ranch serves as a public recreation venue and provides a recreational resource that can	The BLM acknowledges the value of the property for fisheries and waterfowl.

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			be limited to the general public – specifically shallow water fisheries and waterfowl habitat. The landowner at Spring Cove Ranch caters exclusively to youth looking for such recreational opportunities.	
100949	CHRIS COLSON		In addition to the direct impact of the disturbance footprint, transmission lines pose additional indirect impacts to migratory waterfowl by providing advantageous hunting perches for predatory raptors and disrupting typically free low elevation fly areas above wetland habitats.	Effects to migratory birds are addressed in Section 3.10. Additional mitigation is being developed, including mitigation for indirect effects on migratory birds.
100949	CHRIS COLSON		DU is generally opposed to any of the proposed routes and alternatives that are located within major valley floodplains and wetland features and prefer those that are situated in upland habitats	Your opposition to routes and alternatives that are located within major valley floodplains and wetlands is noted.
100949	CHRIS COLSON		The EIS does not place adequate consideration to non-regulated natural resources. Wetland habitats have been evaluated from a regulatory standpoint, and as a vegetation community. However, federal and state laws do not recognize imperiled and/or rare habitat communities unless occupied by federally protected or recognized plants or animals that are associated with those respective habitats.	The BLM has no authority to manage or protect resources on private lands.
100949	CHRIS COLSON		DU argues that wetland habitats need to be considered as a limited and imperiled natural resource in the state of Idaho beyond the “no net loss” regulatory standard	Your statement that wetland habitats need to be considered as a limited and imperiled natural resource in the state of Idaho beyond the “no net loss” regulatory standard is noted. The BLM has no authority over resources on nonfederal lands.
100949	CHRIS COLSON		from a regulatory standpoint, we expect the Bureau of Land Management (BLM) and Idaho Power Company (IPC) to honor Clean Water Act guidance that directs permittees to make all reasonable efforts to avoid and/or minimize wetland impacts.	The BLM fully intends to meet the Clean Water Act requirements. Note that these requirements are enforced by other agencies, not the BLM.
100949	CHRIS COLSON		The Project also has the potential to impact three current DU wetland restoration projects. The three projects are on the Bruneau River Ranch in Owyhee County, Six S Ranch in Cassia County, and Spring Cove Ranch in Gooding County. Collectively, the three projects have private, state, and federal restoration funding totaling nearly \$1,000,000. Project partners include private individuals and foundations, Southern Idaho Land Trust, Idaho Fish and Game, Idaho Department of Environmental Quality, Natural Resources Conservation Service, and the U.S. Fish and Wildlife Service. DU is strongly opposed to direct impacts to these properties as substantial public funding has been invested to the restoration of wetland habitats on these properties totaling more than 500 acres	Wetland protection on private lands is not under the BLM; it is a responsibility of the U.S. Army Corps of Engineers. Measures to avoid, minimize, and mitigate effects on wetlands are included in Section 3.9.
100949	CHRIS COLSON		The Bruneau River Ranch is located directly south of IPC’s Turner Ranch. DU is concerned and frustrated that IPC and the BLM have proposed a route that impacts a neighbor of an IPC property as opposed to maintaining their project impacts on their existing properties	Your concern is noted.
100949	CHRIS COLSON		The Bruneau River Ranch is currently enrolled in the Natural Resources Conservation Service’s Wetland Reserve Program and a conservation easement on the ranch is expected to close before the end of the year.	Conservation easements could affect siting, depending on the specifics. Please note the BLM has no authority to site or not site the line on non-federal lands.

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100949	CHRIS COLSON		•Spring Cove Ranch already has an existing IPC right-of-way on the property. The landowner is concerned that contesting the existing siting of the proposed line may only result in realignment onto a neighbor's property. DU proposes consideration of an alternative north of the existing proposed route out of the Clover Creek valley on BLM-owned upland lands.	Your proposal is noted. The BLM expects that the Proponents will work with the landowners on siting issues during project design.
100950	DANE HARRIS		I am a recreational pilot for ultralight aircraft. I've been flying this site for the past 13 years. My mentor/instructor has been flying it for the past 40 years. We would ask that you would reconsider building on this site, and ask you to consider moving your project further south. On the southeast side of Declo, ID the project is going to run directly across valuable property for home owners and hang gliders and paragliders. It will bring down property value, as well as agricultural and dairy land, and completely destroy the launch site used by many sportsmen in the area. I feel that an alternate route is possible, and more beneficial for the people in this county. Please reconsider your placement of this project.	Your concerns about the line affecting recreation, as well as property values and agriculture are noted.
100950	DANE HARRIS		It will bring down property value, as well as agricultural and dairy land	One study found that properties within 50 feet of a transmission line have property values that are 6 percent to 9 percent lower than the values of comparable properties. It also found that this reduction in value tends to decrease over time. A recent study in Montreal found that direct views of a transmission line tend to reduce residential property value by roughly 10 percent (Des Rosiers 2002). Other studies found lower effects on property values.
100951	STEVEN BAHR		Twenty years ago I learned to fly hang gliders in the Declo area (D, Test Hill). Still fly there to this day. The proposed power line would severely impact the safety of our sport in this area.	Your comment on how the Project would affect hang gliding in the area is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100952	CLAIR PACKER		The section of power line 7f to 7j cover an area which has been and is still some of the only training area for hang gliding and paragliding in the area. This has been used for flying for the last 35 to 40 years. The proposed power line in this area would be very hazardous to anyone flying hang gliders or paragliders on these hills. There are also numerous homes and other properties in this area that the power line would be detrimental to.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100952	CLAIR PACKER		We propose that the best route for this power line would be the state line route.	Your support for Alternative 7K is noted. See Section 2.4.1.1 for the reasons 7K was not the preferred route.
100953	DONALD KING		We strongly SUPPORT segment 8 and segment 9D	Your support for Segment 8 and Alternative 9D is noted.
100953	DONALD KING		We OPPOSE the "BLM Preferred Routes" (segment 8B and 9E and proponent's proposed segment 9) as expressed in the Final Environmental Impact Statement.	Your opposition to the Preferred Route is noted. Refer to Sections 3.21 and 3.22 for a discussion of effects on health.

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100953	DONALD KING		1. Segment 8B and 9E (BLM preferred routes) would burden private citizens with costs of millions of dollars.	Alternatives 8B and 9E are both longer, and would cost more to build. However, the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100953	DONALD KING		2. Should the BLM's Preferred Routes come to fruition, the citizens and governmental authorities of Idaho's reached collaborative consensus would be turned back as meaningless by Washington DC	The consensus process took place prior to the BLM's finding that it would not meet the enhancement requirement of the enabling legislation based on the mitigation proposed at the time the FEIS was completed.
100953	DONALD KING		3. The "enhancement requirements" to Birds of Prey can be met within the construction processes of the project through the Morley Nelson Birds of Prey defined area.	The enhancement requirement of the enabling legislation cannot be met in this way.
100954	BRENT J STOKER		Under NEPA section 4332(c) concerning what must be analyzed and included in each Environmental Impact Statement, sub-sections d through g outlines the Federal Agency's burden to find alternatives, which involves unresolved conflicts. There still exists many unresolved conflicts between Federal agencies and Idaho County and State agencies that this EIS does not resolve in its present form.	NEPA does not require identifying alternatives with no unresolved issues. One of the reasons for preparing an EIS is to disclose significant impacts. NEPA requires the agency identify and assess a reasonable range of alternatives (Part 1500.1 (e)).
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 2-45 o More distance is good if BLM requires it. o More distance is bad if Idaho counties requires it.	The FEIS includes sufficient analysis for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts of the various project alternatives would have on resources.
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 2-129 o BLM didn't follow it's own policies and procedures about burying power lines for Sage Grouse habitat. (BLM's own Greater Sage-Grouse Interim Management Policies and Procedures Instruction Memorandum (IM), Page 3.)	The FEIS includes sufficient analysis for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts the various project alternatives would have on resources.
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 2-193 o Longer length on Public land is bad. o Longer length on Private land is good.	The FEIS includes sufficient analysis for the decision makers to assess the relative impacts between alternatives and to make an informed decision on impacts the various project alternatives would have on resources.
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 3.4-42 o Private Property negotiations are overshadowed by Eminent Domain Law interference, which isn't even addressed in the entire EIS.	Condemnation is addressed in Section 3.17. Chapter 1 notes: "The Proponents would be required to obtain ROW on non-federal lands through negotiated easements or under eminent domain laws."
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 3.11-12 o Idaho's Sage Grouse Maps are not included.	The BLM used the federal sage-grouse maps. The USFWS had not yet concurred with the Idaho policy at the time the FEIS was completed. The Idaho policy is one of the alternatives in the BLM EIS for sage-grouse management scheduled for completion in 2015.

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100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 3.18-12 o “No Action” alternative can be for private property as well.	The comment is correct. No action can apply to private lands. Note that the BLM only makes a decision for federal lands. It has no authority to approve any action (or disapprove of any action) on non-federal lands.
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 3.18-21 o 2001 GPS study for Agriculture outdated.	The BLM hired an independent agricultural specialist at the request of Power and Cassia Counties to provide an analysis of the effects on agriculture. He used as up-to-date information as was available. Refer to Appendix K of the FEIS. This information was used to revise the analysis in the DEIS. See Sections 3.4 and 3.18 in addition to Appendix K.
100954	BRENT J STOKER		Gateway West Final EIS is probably sufficient for BLM’s jurisdiction of public lands. For private property, BLM has no jurisdiction or expertise and this EIS is reflective of this with insufficient information from Idaho’s counties.	The comment is correct. The BLM has no authority over decisions on private lands. It is also true that the BLM has little expertise on agriculture; therefore, it hired an independent specialist approved by the County.
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 1-21 o WECC Separation criteria is lowered but not included in this EIS.	This issue is discussed in detail in Section 1.3.2.
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Section 2.91, Page 2-206 o Minor adverse impacts on private property is subjective by BLM. o Multiple power line effects minimized.	The BLM went to great lengths to consider impacts to private property; it met on many occasions with South Idaho task forces and hired an independent specialist approved by the counties to analyze effects.
100954	BRENT J STOKER		These issues were not thoroughly studied: EIS Page 3.18-24 o Crop Spraying and Transmission Line are not compatible.	Refer to the analysis in Appendix K. While the agriculturist's conclusion does not agree with the contention that crop spraying will be precluded, he does analyze the limitations and additional costs and impacts associated in areas near the lines that cannot be sprayed from the air.
100955	JANAN NEILSON		The Gateway West Project as proposed by BLM is for the said purpose of meeting an increased demand for electricity. However, The Idaho Power 2011 Integrated Resource Plan (IRP) does not forecast any increased demand for electricity or renewable energy; in fact Idaho Power customer needs will be met by the Boardman to Hemmingway Project for the foreseeable future. It appears clear that the true purpose of the Gateway West Project is not to serve Idaho Power’s service needs, but to be part of a transmission grid, for customers in other locations.	The need for the Project is discussed in Chapter 1. The transmission lines not only serve local needs but increase the reliability of the national power grid.
100955	JANAN NEILSON		Even if the need for more electricity in the state could be justified, that need should be balanced with other needs. Obviously farmers need their land for production, local economies need the circulation of dollars that support the farmer’s crop production, and the world at large needs the food supply. For example, The High Level Expert Forum projects “that feeding a world population of 9.1 billion people in 2050 would require raising overall food production by some 70 percent between 2005/07 and 2050”—and this must be done with an ever decreasing rural population. With this need in mind, how can Gateway West justify 80% of segments 7 and 8 passing through private	The fact that agriculture is important is not in dispute. Refer to the analysis in Appendix K, as well as in Sections 3.4 and 3.18 for effects from the proposed transmission line on agriculture. The majority of the 1,000-mile plus Preferred Alternative is on public land. Approximately 33 percent of Segment 7 and 17.5 percent of Segment 8 of the Preferred Route cross agricultural lands. The reasons for selection these routes are disclosed in Section 2.4.1.1 of the FEIS.

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			agricultural land? Idaho has a high percentage of federal land, not in agricultural production that could be used for this project, thus allowing both the need for electricity and the need for crop production to be met. Perhaps there is a mistaken notion among decision makers that land can just be put into production as needed. Only a small percentage of land is suited to agricultural production; the land that is suitable must be cleared and cultivated for several years before it becomes productive. Anyone who has been involved in “breaking out” ground recognizes this is no small matter. “The world has the resources and technology to eradicate hunger. It needs to mobilize political will and build the necessary institutions to ensure that key decisions on investment levels and allocation as well as on agricultural and food security policies are taken with the goal of hunger eradication in mind.”	
100955	JANAN NEILSON		I have not mentioned visual impact, negative effects on animal, human, and plant health, or sage grouse habitat which represent still more “needs”. The current plan for Gateway West is shortsighted and lacks balance. Plainly, the Gateway West Project needs to be returned to “the drawing board” and rerouted in a manner that that allows ALL needs to be met.	The EIS disclosed the effects from the proposed and alternative routes considered in the EIS. Effects in visual resources are disclosed in sections 3.2 and 3.3, as well as in Appendix G. Additional simulations are located in Appendix E. Effects on wildlife in Sections 3.10 and 11, plants in Sections 3.6, 3.7, and 3.8. Effects on social and economic resources in Sections 3.4 and 3.5. Effects on agriculture in Sections 3.4, 3.18 and Appendix K.
100956	DENNIS SMITH SR	SHOSHONE-BANNOCK TRIBES/INDIANS	We wish to provide you with this official indication of our review and approval of the copy we have received of the two part report by Walker Research Group, Ltd., concerning the cultural landscapes in our homelands of southern Wyoming and Idaho. We hope that BLM officials and others in authority will take notice of this important ethnographic study in locating the proposed Gateway West power line right-of-way. These landscapes must be protected as an important part of our homeland and living heritage. We also wish to see this report shared with the BLM, but we do not wish to see it made public. The information it contains should be kept confidential. We understand that the BLM is willing to recognize our request and we would appreciate a response concerning who will see this report besides the URS Corporation and BLM.	The report will be used by the BLM but not shared with the public, as requested.
100957	DIANA WILSON		I want the line that impacts our area, which I believe is identified as Segment 9E to be routed through the Birds of Prey area where there is already an existing 138kV line	Your support for routing the line through the NCA is noted. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100957	DIANA WILSON		There apparently is a proposed option of siting the line through private property located in our area. This suggestion is preposterous with the existing line already in place through the Birds of Prey area.	Your opinion of Alternative 9E is noted.

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100957	DIANA WILSON		Idaho is about 80% federal and state owned lands. Why would the government even suggest impacting privately owned property?	Please note that the BLM's preferred route (Alternative 9E) and the county's preferred route (Alternative 9D) both cross 3.3 miles of private property. Approximately 95 percent of each route in on public land. The issue appears to be more a question of whose private land is crossed, not how much is crossed.
100958	FRANK GILLETTE		I have been running a Flying School on Water Canyon and Test Hill for the past 40 years. I have taught 100rds of flyers to come off the top of Test Hill just where you are proposing to put this line. I am very much opposed to it being put there.	Your comment on the importance of Test Hill for flyers is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100958	FRANK GILLETTE		We also have a Golden Eagle that nests in the Water Canyon. It would ruin that nesting habit,	Impacts on eagles are discussed in Sections 3.10 and 11. The line would meet requirements of the avian protection plan approved by the USFWS.
100958	FRANK GILLETTE		From what I can tell the 7E route would be the best of the worst situation	Your lukewarm support for Alternative 7E is noted.
100958	FRANK GILLETTE		I would really prefer you put them underground.	Refer to Section 1.3.2 for an analysis of placing the lines underground.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	1. Placement of Line Underground The FEIS discusses placing the Gateway West Transmission Line underground in Section 2.6.3 based on data provided by the proponents of the project. It appears Section 2.6.3 was written to consider placing the entire line underground and concluded it that was not feasible. See FEIS 2.6.3.4. Underground lines may cost up to 12 to 17 times more than overhead lines and take over twice as long to construct. FEIS 2-91, 2-99. However, the Board only proposes placing approximately 8 miles of the line underground near the residential areas south of Cokeville. This is reasonable mitigation due to the impacts on property values, views from the affected homes, and the quality of life. According to the FEIS, the High Pressure Fluid-Filled Cable (HPFF) and the Self-Contained Fluid Filled Cable (SCFF) are the only two proven and logical technologies for a 500 kV system. The SCFF Cable has proven itself as highly reliable for 500 kV systems for long submarine or subterranean distances. Pumping plants are required to be placed every 7-10 miles and large transition stations are located at each end of the underground portion of the line. FEIS 2-93, 2-98. In addition, access roads, similar to those for the overhead lines, would need to be constructed. FEIS 2-91. This is similar to the routinely buried natural gas and oil pipelines, but with much less environmental risk or harm. The only environmental concerns are the fact that a trench would need to be constructed for the entire underground portion of the Line and there is potential for fluid leaks and pipe corrosion. The environmental impact to existing habitat caused by the trench would be minimal as this portion of the line runs through residential areas with no special management restrictions for wildlife, particularly the sage-grouse. After the trench is covered, the	The EIS addresses burying the transmission line in Section 2.6.3 of the FEIS. The additional cost and disturbance identified in that section would apply to an eight-mile section, as well as to a longer segment. Placing a 500 kV line underground would cost additional 7 to 12 times as much as building an overhead line. Based on an average above ground cost of \$2 million per mile, placing an 8-mile section underground would cost between \$112 and \$208 million compared to \$16 million for an above ground line. This cost would be passed on to ratepayers, assuming the state regulators would approve this unusual alternative. In addition, burying the line requires digging a continuous trench, requiring at least a 30-foot wide disturbance area (see Figure 2.6-2 in the FEIS). Installations similar to substations would be required at each end of the underground section, each of these would require about 4 acres. The reliability of an underground 500 kV line over the life of the Gateway West project is unproven. The BLM appreciates the concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville without the added cost, disturbance, and risk of a buried line.

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			resulting environmental impacts are no greater than those from construction of overhead lines. Though leaks may occur, there are fewer outages than with overhead lines. FEIS 2-91. Further, a majority of outages and damage to underground lines is the result of third party interference with the underground cable. National Grid, Undergrounding High Voltage Electricity Transmission: The Technical Issues, at 8 (Aug. 2009). The underground portion of the line would cross only two roads and a majority of undeveloped land, so the potential for third party influence to the line would be minimal. Surface marking would also prevent third party influence. Several layers of material cover the insulating fluid surrounding the wire, preventing corrosion damage that would result in leaks. National Grid, at 5. Burying high voltage power lines is safer, more reliable and efficient, does not visually blight on the landscape, does not devalue property, has fewer environmental impacts, incurs lower maintenance costs, and is actually cheaper than overhead lines over the life of the line. It has also been very successful in Asia, Europe, and Canada. The Board urges BLM to review the underground alternative to insulate cables with cross linked polyethylene material (XLPE) as well, which provides insulation without fluids, removing this potential cause of system failure or environmental contamination. This possibility was not discussed in the FEIS.	
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	If BLM rejects the underground option, then the Board requests BLM consider the proposed re-route as shown on the attached map. (See Ex. 1).	The route submitted by the County was not considered in detail because it crosses approximately 7 miles of sage-grouse core area outside the Governor's corridor. The BLM appreciates the concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville without the added cost, disturbance, and risk of a buried line.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY, etc. [as preceding]	re-route was proposed in an effort to avoid residential areas in and near the town of Cokeville	The route submitted by the County was not considered in detail because it crosses approximately 7 miles of sage-grouse core area outside the Governor's corridor. The BLM appreciates the concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	The re-route was proposed in an effort to avoid residential areas in and near the town of Cokeville and to avoid the proposed Sublette Creek Reservoir.	The BLM appreciates the concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	It also avoids additional historic trail crossings	Noted. However, the route submitted by the County was not considered in detail because it crosses approximately 7 miles of sage-grouse core area outside the Governor's corridor.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	It also avoids additional historic trail crossings, sage grouse leks	Noted. However, the route submitted by the County was not considered in detail because it crosses approximately 7 miles of sage-grouse core area outside the Governor's corridor.
100959	PAUL C JENKINS,	LINCOLN	avoids the "BLM -designated Bear River and Rock Creek Ridge SRMAs	Noted. However, the route submitted by the County was not

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	JONATHAN TEICHERT	COUNTY, BOARD OF COMMISSIONERS (WY)	along US 30/SR89	considered in detail because it crosses approximately 7 miles of sage-grouse core area outside the Governor's corridor.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	" and visual impacts to Fossil Butte National Monument and Cokeville Meadows NWR	Impacts to visual impacts to Fossil Butte National Monument and Cokeville Meadows NWR for a route not already considered in the FEIS would need to be analyzed.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	By electing the Board's re-route over the current Proposed Route 4, the only additional concern is that the Board's re-route will pass through sage grouse core areas outside of the Wyoming Governor's designated sage grouse corridor. Wyoming Executive Order 2011-5. However, new transmission lines sited outside established corridors are allowed if it is demonstrated that the activity will not cause a decline in sage grouse populations. Id. Regardless of the route chosen, it appears that each of the alternatives analyzed will pass through sage grouse core area, including the Proposed Route. The project proponents have petitioned to allow the Proposed Route 4 outside of the Wyoming Governor's designated sage grouse corridor. The request was made so as to avoid the placement of towers in the Fish Creek area where steep, unstable soils and sloughing had necessitated the relocation of the lines. Obviously, if the proposed route can be re-directed to avoid steep hillsides, it can also be re-directed to avoid residential areas.	The BLM will continue to work with the County and the State on routing. Any reroute must be consistent with the governor's sage-grouse policy on federal land unless approved by the State. As required by the Governor's policy, the existing disturbance and the additional Project disturbance cannot exceed 5 percent in a core area outside the designated corridors. A disturbance calculation was completed for the County's proposed reroute. The existing disturbance was over 23 percent.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	3. Alternative Routes 4B and 4D If neither the underground alternative near Cokeville or the Board's reroute is selected, then the Board supports either Alternative Route 4B or 4D, because neither of these routes directly interferes with human health or residential developments.	Refer to Section 2.4.1.1 for the reasons that these routes were not selected.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	These routes would provide the lowest anticipated visual impacts compared to the Proposed Route, would avoid more VRM Class II lands than the other alternatives	Refer to Section 2.4.1.1 for the reasons that these routes were not selected.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	would impact fewer recreational	Refer to Section 2.4.1.1 for the reasons that these routes were not selected.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	or culturally sensitive areas than the other routes	Refer to Section 2.4.1.1 for the reasons that these routes were not selected.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	Because the Gateway West Transmission Line would result in such a wide impact area through Cokeville residential areas, the Board requests BLM to adopt one of the following alternatives: (1) first, require the proponents to bury the Gateway West Transmission Line for approximately 8 miles as it passes south of Cokeville (See Ex. 1); (2) if alternative (1) proves to be unobtainable, then alter the route near Cokeville by creating a Reroute from the Proposed Route southeast of Cokeville to connect with Alternative 4C south of Cokeville airport (See Ex. 1);	The BLM appreciates the concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville without the added cost, disturbance, and risk of a buried line.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN	and (3) finally, if neither (1) nor (2) is possible, the Board supports	Your support for Alternatives 4B and 4D if other options are not

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	JONATHAN TEICHERT	COUNTY [as preceding]	Alternatives 4B and 4D areas as the preferred route	acceptable is noted. Refer to Section 2.4.1.1 of the FEIS for the reasons that these routes were not selected.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	Either of these two alternatives would require amendments to the Kemmerer RMP similar to those amendments already required if the line is closer than .6 miles of sage grouse leks	Noted; these amendments are discussed in Appendix F-1.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	See FEIS 2-50 - 2-51. Alternative Routes 4B and 4D would be outside the established sage grouse corridors, so a demonstration that construction of the transmission lines will not cause a decline in the sage grouse populations would be required. See Wyoming Executive Order 2011-5.	Noted. The State would need to agree with such a finding. Refer to Section 2.4.1.1 of the FEIS for the reasons that these routes were not selected.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	Further, Alternative 4B should not be considered a "greenfield route" near the Monument, because it follows existing linear features. FEIS 2-51	Your opinion on this is noted. The Monument has not supported these routes in comments on the project.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	B. Alternatives not in Conformance with State of Wyoming Executive Order 2011-5 The Board supports the Wyoming Executive Order 2011-5 sage grouse core area directive to the extent that it allows a two-mile wide corridor through the Sage and Seedskaadee Core Areas. The other Alternative Routes do not conform to this portion of the Wyoming Executive Order. If any of those Routes are chosen for the final decision, then it will have to be shown that construction of the transmission line will not cause a decline in sage grouse populations. The Board has proposed that Alternative Route 4B or 4D become the preferred Alternative if BLM rejects the other changes to the Proposed Route. The Board recognizes that these alternatives are not within the two mile corridor, but they may still comply with the Wyoming Executive Order. Although the scientific data are not currently available, it is very likely that Alternative Routes 4B and 4D will not harm sage-grouse populations considering the impacts that current development and structures, such as highways and railroads, have already changed the sage-grouse habitat. The Board supports the designation of a utility corridor for Alternative Routes 4B and 4D. The Board also recommends a one mile utility corridor for all other routes, especially the Proposed Route, taking into consideration the Board's concerns with the line passing through residences in Cokeville. This would benefit two other transmission lines that have been proposed to shortly follow. An official utility corridor designation would also solve various conformance issues with the RMPs. It would render moot one-time allowances for crossing a NHT, for viewsheds of NHT segments, and for VRM classes.	Refer to Section 2.4.1.1 of the FEIS for the reasons that Alternative Route 4B or 4D were not selected. The BLM will continue to work with the state, the counties, and the Proponents on these issues.
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	Alternatives 4B/C and 4D/E would be visible from the Fossil Butte National Monument visitor center parking lot. Also visible is County Road 300, a busy US HWY 30, the Union Pacific Railroad - Oregon Shortline, two existing powerlines (tall double-pole H-frame with parallel shorter single pole powerline), the townsite of Fossil, cattle shipping yards, the Williams Gas Compressor Station Site, Williams	Visual impacts for these routes are discussed in Sections 3.2 and 3.3, as well as in Appendix G.

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			Northwest Pipeline corridor, telephone lines, electric distribution lines and at least half a dozen fossil quarries. Additional visual impacts would be minimal. Considering the many other land uses and linear corridors nearby, Alternatives 4B and 4D are not creating new land uses negatively impacting the visual resources from the parking lot of the Fossil Butte National Monument.	
100959	PAUL C JENKINS, JONATHAN TEICHERT	LINCOLN COUNTY [as preceding]	On page 3.2-121 of the FEIS, it states that Alternative Routes 4B and 4D “would cross the south end of the Cokeville Meadows NWR, although not lands managed by the USFWS, [which] would result in moderate to high visual impacts in the refuge due to the impact on pristine refuge land with little human-made elements apparent from most views.” The lands crossed by Alternative Routes 4B and 4D are not part of the Cokeville Meadows NWR lands. The only lands which may be managed as wildlife refuges are public lands withdrawn from other uses, lands donated to the agency, lands purchased by the agency, lands exchanged by the agency, or any lands managed as wildlife refuges pursuant to a cooperative agreement with any state or local government, any federal department or agency, or any other governmental entity. 16 U.S.C. § 668dd(a)(6). The lands crossed by Alternative Routes 4B and 4D do not qualify for management as a national wildlife refuge under 16 U.S.C. § 668dd(a)(6). Therefore, the FEIS must make clear that these lands are not legally part of the Refuge and cannot be forcibly managed as if they were part of a wildlife refuge. Further, the Gateway West Transmission Line will not impact the “pristineness” of the portion within the boundaries of the Cokeville Meadows NWR it “allegedly” crosses. Transmission lines currently exist on refuge lands and within the proposed acquisition boundary area. Therefore, the character of these lands will not change from their current condition.	The County’s position on which lands can be managed as part of the refuge and on the “pristineness” of these lands is noted. While these lands are not managed by the USFWS as the comment states, effects on resources must still be considered.
100960	CAROL ANDERSON, SUZANNE BOHAN, ERIK PETERSON	EPA, REGION 8	The EPA commends the BLM for their extensive coordination with cooperating agencies, stakeholders and the general public that occurred throughout the entire NEPA process for this project and their responsiveness to our comments on the Draft EIS. The Final EIS includes improved resource protection measures. For example, the proponents and agencies made project modifications to avoid impacts to greater sage-grouse and developed a mitigation strategy with a commitment to replace the habitat services lost for unavoidable impacts to sage-grouse habitat. As the project moves to the implementation and operation phases, we encourage the BLM and the proponents to continue to seek means to avoid impacts within the selected right-of-way and we offer the following specific suggestions.	The BLM is continuing to work on reducing and mitigating impacts as the project progresses.
100960	CAROL ANDERSON, SUZANNE BOHAN, ERIK	EPA, REGION 9	Overall, the Final EIS addresses the majority of our aquatic resource comments on the Draft EIS. We particularly appreciate that the proponents and the BLM have agreed to additional protections to non federal lands and aquatic resources, such as WET-2. We also appreciate	Your comments on aquatic resource protection are noted.

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	PETERSON		that the Final EIS recognizes that functions and values "will be used to assist in determining the extent of mitigation for unavoidable impacts to wetlands." Also, the additional wetlands geospatial information improved the reader's ability to understand the potential for the project to impact these important resources.	
100960	CAROL ANDERSON, SUZANNE BOHAN, ERIK PETERSON	EPA, REGION 10	The mitigation framework in Appendix C-2 discusses use of an In-Lieu Fee (ILF) to address mitigation needs. It was not clear whether the proponent or a third party would incorporate and manage the ILF. The Final EIS also did not discuss whether an ILF would be the appropriate mechanism for mitigation under the 2008 Mitigation Regulations. Please consider adding clarification of these points in the final mitigation plan.	Appendix C-2 is specifically related to "Waters of the U.S." and is not applicable to the entire project. The compensatory mitigation addressed in this appendix is a typical mitigation practice under Section 404 of the Clean Water Act and overseen by the Army Corps of Engineers. This appendix is a proposal from the Proponents, not originated by the BLM. Please determine the status of this plan with the Corps and request the Proponents to make any changes/clarifications the Corps deems necessary.
100960	CAROL ANDERSON, SUZANNE BOHAN, ERIK PETERSON	EPA, REGION 11	As the project moves to construction, we recommend utilizing existing lodging facilities for housing construction workers whenever possible. If man camps are utilized for some segments, it is important they be sited and designed with waste handling practices that assure protection of surface and ground waters.	We will pass this recommendation on to the Proponents. The BLM has no authority to require this; it is a state issue.
100960	CAROL ANDERSON, SUZANNE BOHAN, ERIK PETERSON	EPA, REGION 12	Siting Constraints The new EIS section 1.3.5, "Existing Transmission System Reliability Constraints," is responsive to EPA's request for additional information regarding the project-wide application of a 1,500-foot minimum separation distance. We note that the Final EIS discussion includes information from a study commissioned by the Wyoming Infrastructure Authority, "Framework for Analyzing Separation Distances between Transmission Lines in Wyoming" by ICF International (ICF Study) that supports flexibility in setting separation distances. We recommend that the BLM consider the feasibility of allowing for site-specific reductions when there are opportunities to reduce impacts to particularly sensitive or rare resources	Some site-specific reductions in the distance between lines were considered in the project, e.g., along segment 1W and Segment 4; however, generally the separation criteria was followed.
100960	CAROL ANDERSON, SUZANNE BOHAN, ERIK PETERSON	EPA, REGION 13	Consistent Application of Environmental Protection Measures Our review found that overall the Final EIS contained a robust package of environmental protection measures (EPMs). We note that some EPMs applied to federal lands and are not used on non-federal lands. The EPA recommends that the proponents consider adopting use of the EPMs on non-federal lands, particularly WET-1, TESWL-14 (formerly TEWSL-1) and VEG-12 (formerly VEG 8).	The BLM also made this recommendation in the DEIS; however, it cannot require the measures be implemented on private land.
100961	ANDRA CATES		Considering the Gateway West project Segment 5 and 7. I would like to know why the BLM is pushing for a plan that benefits only itself, by avoiding the controversy of placing public utilities on public land. The Idaho State Journal reported that between Downey and American Falls, only 13 miles of the proposed line would be on BLM land. The BLM needs to consider how landowners feel about the proposed line occupying their land before they go through with this plan	The reasons for the BLM's Preferred Route in segments 5 and 7 are listed in Section 2.4.1.1 of the FEIS.
100961	ANDRA CATES		Also, just because the transmission line is on private land, it does not mean it will not affect public recreation or the scenic beauty of the	The EIS recognized that developments on private land also affect recreation and scenic beauty. The effect on property values is

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			Deep Creek Mountains. I live on the east side of the Rockland Valley and this transmission line will negatively impact my view of the Deep Creek Mountains. It could also negatively impact the property value of my home. I walk and recreate in this area almost daily. If the Gateway West project is installed as proposed it will negatively impact my quality of recreation and my quality of life. More emphasis should be placed on how these large structures will affect the scenery of Idaho not only now but for future generations.	included in Section 3.4.2.2. This discussion focuses on property crossed by the transmission line. However, one study found that properties within 50 feet of a transmission line have property values that are 6 percent to 9 percent lower than the values of comparable properties. It also found that this reduction in value tends to decrease over time. A recent study in Montreal found that direct views of a transmission line tend to reduce residential property value by roughly 10 percent (Des Rosiers 2002). Other studies found lower effects on property values.
100961	ANDRA CATES		There is new technology which allows transmission lines to be buried. The Power County Gateway West Citizens Task Force requested that buried lines be considered. However, buried lines were not addressed in the Environmental Impact Statement. Buried lines would alleviate my recreational and residential concerns. They would also alleviate the concerns of private landowners. Buried transmission lines would create a win-win situation for everyone involved and they must be considered for Gateway West.	The FEIS considers burying transmission lines in Section 2.6. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	As supporters of the National Conservation Lands, the Foundation and the "Friends" are primarily concerned with the siting of the Gateway West Transmission Line through the Morley Nelson Snake River Birds of Prey National Conservation Area (Birds of Prey NCA). Protected by Congress in 1993, the Birds of Prey NCA provides habitat for the largest concentration of nesting birds of prey in North America, and perhaps in the world. More than 800 pairs of falcons, eagles, hawks and owls gather each spring to mate and raise their young. The Birds of Prey NCA is extraordinarily unique and distinctive and deserves the highest degree of protection. BLM must avoid siting new transmission lines through the Birds of Prey NCA.	The BLM agrees that the NCA is unique and distinctive and deserves the highest degree of protection. BLM has generally avoided siting new transmission lines through the Birds of Prey NCA. The preferred routes for Segments 8 and 9 cross in or near existing corridors along the edges of the NCA and mitigation is required to meet the enhancement requirements of the enabling legislation.
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	In addition, the Foundation is concerned with the siting of a transmission line through greater sage-grouse habitat. Currently, the U.S. Fish and Wildlife Service has found the greater sage-grouse warrants protection under the Endangered Species Act. Allowing development of a large transmission line through this landscape could result in harmful and potentially irreversible impacts to important greater sage-grouse and should be avoided at all cost.	The Preferred Routes for the Project in Wyoming are generally within the Governor's corridor. The Preferred Routes in Idaho generally avoid sage-grouse Preliminary Priority Habitat. It is not practical to completely avoid all sage-grouse habitat crossing Wyoming and Southern Idaho. In addition to the discussion in Section 3.11, refer to the Sage-Grouse Avoidance, Minimization, and Mitigation Plan (Appendix C-3), the Sage-Grouse Impacts Analysis (Appendix J-1), and the Habitat Equivalency Analysis (Appendix J-2).
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	Since the siting, construction and maintenance of a transmission line in an NCA has not been proven compatible with the establishing legislation, BLM must find alternative routes for Segment 8 and 9.	Section 3.17 discloses the issues involved with crossing the SRBOP NCA, Appendix F-1 discussed the issues associated with management requirements for the NCA. Additional mitigation has been offered by the Proponents to compensate for impacts should either the proposed routes for Segments 8 and or 9 or one of the alternative routes be selected.

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100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	In 2012, the BLM released Policy Manual 6220, which set specific guidance for BLM concerning the granting of new rights of ways through units of the National Conservation Lands. In fact, it creates a presumption that BLM will not approve new rights-of-ways in National Monuments and National Conservation Areas. The manual states: To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designating or authorizing use of transportation or utility corridors within Monuments and NCAs. To that end, and consistent with applicable law, when developing or revising land use plans for Monuments and NCAs, the BLM will consider: a. design-ating the Monument or NCA as an exclusion or avoidance area; b. not designating any new transportation or utility corridors within the Monument or NCA if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the Monument or NCA was designated; c. relocating any existing designated transportation and utility corridors outside the Monument or NCA; (BLM Manual 6220). BLM Manual 6220 was released on July 13, 2012, nine months prior to the release of the FEIS. Yet, the FEIS and BLMs preferred alternatives for Segment 8 and 9, which cross through portions of the Birds of Prey NCA, fail to meet the standards set out in Manual 6220. In fact, the FEIS does not even reference the recent rights-of-way manuals or how the Preferred Alternatives meet the requirements set within. The Conservation Lands Foundation requests that the BLM apply its own policy and the appropriate stand-ards for siting segment 8 and 9 of the Gateway Transmission Line.	Manual 6220 states: "District and Field Manager shall: Ensure that all activities on Monument and NCA lands are consistent with the relevant designating legislation..." This is the reason that the BLM did not select the proposed routes or other alternatives for segments 8 and 9. Our review of the EIS indicated that only the Preferred Routes would meet the intent of the enabling legislation. The BLM considered and complied with the direction under Part E of the manual (Rights-of-Way and Transmission and Utility Corridors) in selecting the Preferred Route. A point-by-point review of the direction in Part E demonstrates that the BLM complied with this direction. As required by Manual 6220, Part E, subpart 5, the BLM "to the greatest extent possible" located the routes in existing corridors and will require adequate mitigation.
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	The Conservation Lands Foundation requests that BLM develop alternative routes for Segment 8 and 9 that avoid the Birds of Prey NCA.	The BLM searched for routes between Borah and Hemingway and between Cedar Hill and Hemingway that avoid the NCA. The Preferred Route for Segment 8 largely avoids the NCA, crossing 2 miles of the NCA within a corridor established by the RMP. Refer to the maps in Appendix O and the discussion in Section 2.4.12 concerning why these routes were not carried forward. Routes that would completely avoid the NCA in Segment 9 would have to cross sage-grouse Preliminary Priority Habitat and/or the undeveloped Owyhee Mountains, as well as the Jarbidge Military Operations Area which occupies the area between Nevada and the NCA. The Preferred Route primarily crosses within a corridor established by the RMP.
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	Effects to Safe-Grouse The U.S. Fish and Wildlife Service has found the greater sage-grouse warrants protection under the Endangered Species Act. BLM's Instruction Memorandum (IM) 2012-043 "provides interim conservation policies and procedures to the [BLM] field officials to be applied to ongoing and proposed authorizations and activities that affect the Greater Sage-Grouse and its habitat." Development of transmission lines could result in harmful, and potentially irreversible	The Preferred Routes for the Project in Wyoming are generally within the Governor's corridor. The Preferred Routes in Idaho generally avoid sage-grouse Preliminary Priority Habitat. It is not practical to completely avoid all sage-grouse habitat crossing Wyoming and Southern Idaho. In addition to the discussion in Section 3.11, refer to the Sage-Grouse Avoidance, Minimization, and Mitigation Plan (Appendix C-3), the Sage-Grouse Impacts

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			impacts to sage-grouse. The Conservation Lands Foundation strongly supports the position and recommendations made by the Idaho Conservation League in a letter dated May 28, 2013. We have included the relevant text below: We are particularly concerned about impacts to sage-grouse and ask that the BLM craft any amendments to avoid, minimize and mitigate impacts. Sage-grouse were recently determined to warrant full protections under the Endangered Species Act but were precluded by higher priorities. One of the top threats to sage-grouse are infrastructure projects: Disturbance to important seasonal habitats: Human activity and noise associated with machinery or heavy equipment in proximity to occupied leks or other important seasonal habitats may disturb sage-grouse	Analysis (Appendix J-1), and the Habitat Equivalency Analysis (Appendix J-2).
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	I. Segment 8 and Segment 9 are NOT Proven Compatible with Legislation Establishing the Morley Nelson Snake River Birds of Prey National Conservation Area AND the BLM's policy directives for management of the National Conservation Lands The BLM's Preferred Alternatives for Segment 8 and Segment 9 cross through portions of the Morley Nelson Snake River Birds of Prey National Conservation Area (Birds of Prey NCA). The Birds of Prey NCA is a unit of the National Conservation Lands (National Landscape Conservation System) which was established "in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations." (National Landscape Conservation System Act, 16 U.S.C. § 7202(a) (2009)). Secretarial Order 3308 further expounded on these conservation standards by stating, "BLM shall ensure that the components of the [National Conservation Lands] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values." The Birds of Prey NCA was established for the "protection, maintenance, and enhancement of raptor populations and habitats" and "the natural and environmental resources and values associated therewith, and of the scientific cultural, and educational resources and values." (16 U.S.C § 460iii-3(b)(7)). The Birds of Prey NCA contains the greatest concentration of nesting raptors in North America. About 700 raptor pairs, representing 16 species, nest in the Birds of Prey NCA each spring, including golden eagles, burrowing owls, and the greatest density of prairie falcons in the world. The Birds of Prey NCA is a unique habitat for birds of prey because the cliffs of the Snake River Canyon provide ideal nesting sites, while the adjacent upland plateau supports unusually large populations of small mammal prey species. In the Birds of Prey NCA, BLM must prioritize protection, maintenance, and enhancement of raptor populations and habitat and natural, environmental, scientific, cultural, educational resources and values over other uses in the NCA. The FEIS states that the BLM "determines	The BLM is following direction for the NCA. Refer to Sections 2.4.1.1 and 3.17, as well as Appendix F-1 for a discussion of the management requirements for the NCA. Adequate mitigation is needed to meet the enhancement requirements of the enabling legislation for the NCA. This has not been offered to date. The BLM is continuing to work with local stakeholders toward consensus on these segments.

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			<p>compatibility of those uses with the purposes for which the [NCA] was established.” (FEIS at 3-17.20). Therefore, the BLM must show how the siting, construction and maintenance of a transmission line protects, maintains or enhances: 1) raptor populations and habitat; and 2) natural, environmental, scientific, cultural and educational resources and values. The Gateway West transmission line will be constructed by using steel lattice towers between 145-180 feet tall. The FEIS states that, “To construct towers, vehicular access will be required to each structure. ...New access roads will be constructed and existing roads widened as needed to provide a 14-foot-wide travel way. With few exceptions, construction access roads become roads needed for operations. The installation of transmission structures requires preparation of each site where a structure will be installed, including vegetation removal and grading to obtain a relatively flat surface for the operation of the large cranes used to install structures.” After holes are dug and concrete piers installed “the structures are brought in either by truck or by helicopter. After the structures are assembled and in place, the conductors and the overhead ground wires will be strung from tower to tower. This is generally accomplished using a helicopter.” (FEIS, Appendix B at 3.3.1.3- 3.3.2.1) Disturbance (including visual disturbance and noise) caused by construction workers, construction vehicles and/or equipment, as well as post-construction maintenance work, will negatively affect raptor species and ravens. Disturbance during the nesting season can cause nest abandonment or nest failure in raptor species. Raptors can be especially sensitive to this type of disturbance during courtship, just before the egg laying period. Disturbance during the incubation period and early brooding period can scare adults from nests. In addition, the siting, construction and maintenance of transmission lines is highly impactful to not only raptors themselves, but to their prey and prey habitat. The FEIS states that construction of the towers themselves would have a direct and negative effect on wildlife habitat. “A direct impact on wildlife habitat would be removal of vegetation for roads, pads for transmission towers, transmission line safety, and ancillary facilities...” (FEIS at 3.10-20) The construction of transmission lines will also cause habitat fragmentation. Fragmentation will occur through the clearing of vegetation for the rights-of-way and access roads during construction and will continue for the life of the project. Habitat fragmentation has effects on plants and animal species, fire regime, vegetation structure, wildlife habitat and the overall health of an ecosystem. Taking into account the aforementioned impacts and disturbances, the FEIS has failed to show how the siting, construction and maintenance of transmission lines is compatible with the protection, maintenance and enhancement of raptors and raptor habitat and natural, environmental, scientific, cultural and educational resources and values. We believe that siting of a</p>	

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			transmission line through the NCA is incompatible with the establishing legislation.	
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	The FEIS justifies choosing Segment 8 and 9 by concluding that these segments generally avoid the Birds of Prey NCA and "it is likely" that BLM can satisfy the enhancement requirements of the NCA legislation. (FEIS at 2-48, 2-47). There is no further analysis in the FEIS demonstrating compatibility or enhancement	Additional mitigation has been offered by the Proponents to compensate for impacts should either the Proposed Routes for Segments 8 and or 9 or one of the alternative routes be selected. To date, this is not sufficient to meet the enhancement requirement. The Project would not be authorized without an adequate level of mitigation.
100962	DANIELLE MURRAY, BRIAN O'DONNELL	CONSERVATION LANDS FOUNDATION	Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-125 The Conservation Plan also recommends developing off-site mitigation for unavoidable impacts: Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities. -Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126 With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation: Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure. - Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126 The BLM should consult closely with the Idaho Department of Fish and Game and the Local Sage-grouse Working Group to determine appropriate measures to avoid, minimize and mitigate impacts. The BLM, when considering mitigation requirements for adverse sage-grouse effects, needs to consider both the appropriate spatial scale for considering effects of proposed management activities on sage-grouse and their habitat as well as the adverse impacts of invasive exotic plant species, and the increased threat of wildfire. Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the different habitats throughout the year. Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below: 1)Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush. 2)Movement to winter habitat. 3)Occupation of winter habitat from November through February. The primary requirement of winter	Section 3.17 discloses the issues involved with crossing the SRBOP NCA, and Appendix F-1 discussed the issues associated with management requirements for the NCA. Additional mitigation has been offered by the Proponents to compensate for impacts should either the Proposed Routes for Segments 8 and or 9 or one of the alternative routes be selected. The BLM is evaluating this proposal. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse.

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			<p>habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges. 4)Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009). 5)Female movement to nesting sites and nesting between March and June. Nesting females commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007) 6)Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks. Knick and Hansen (2009) analyzed factors in lek persistence of over 5,000 leks. They used three radii to test for landscape disturbance effects on lek persistence – radii of 3.1 miles, 11.2 miles, and 33.5 miles. Previous studies had shown behavioral effects on sage-grouse related to sagebrush disturbance at the 33.5 mile radius (Swenson et al. 1987, Leonard et al. 2000). Knick and Hansen’s study showed adverse effects on lek persistence from wildfire at the 33.5 mile radius. Avoiding and minimizing human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and brood-rearing habitats. Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, additional mitigation efforts will be needed for disturbance to sagebrush near lekking areas; disturbance and loss of sagebrush and native forbs used for early brood-rearing; and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing. A conservative estimate for the nesting and brood rearing area affected will include buffers with radii of 6.2 miles around known leks. Mitigation specifics could be based on a mitigation template recently created for the Lesser Prairie Chicken, a ground-nesting species facing similar threats (Horton et al. 2010).</p>	

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100964	TONI HILL		Considering segments 5 and 7 of the Final EIS, Gateway West Transmission Line Project. I enjoy visiting my daughter who lives along the Deep Creek Range near Rockland, Idaho. I have recreated in and near Big Canyon, The East Fork of Rock Creek, Cold Creek and Little Creek and have enjoyed the scenery of the Deep Creek Range very much. I am unhappy to learn that the Gateway West Transmission line is proposed to travel across the entire west side of these mountains. It is a shame to ruin yet another mountain range with transmission lines.	Your concern is noted. The alternatives to the Preferred Route require building two transmission lines through the Deep Creek Mountains. Refer to Section 2.4.1.1 for the reasons the Preferred Route was selected.
100964	TONI HILL		I understand that buried lines are now being utilized in many cases. However, buried lines were not studied for Gateway West. This is a great omission of the final EIS. Overhead transmission lines have scarred the west for long enough. Buried lines must be seriously considered for Gateway West and all other new transmission lines.	Refer to Section 2.6 for a discussion of burying the lines. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
100965	SANDY & DUSTIN WEBSTER		I am a member of the Shoshone-Bannock Tribes. I was raised in the Rockland Valley near the Deep Creek mountains. I am upset to learn that the proposed route for the Gateway West transmission line is near my childhood and parents' home. The proposed line will negatively impact the view of the entire west side of the Deep Creek mountains. These mountains are special to me and I do not want to see the view spoiled.	Your concern is noted. The alternative was crossing through the Deep Creek Mountains. Refer to Section 2.4.1.1 for the reasons the Preferred Route was selected.
100965	SANDY & DUSTIN WEBSTER		If one line is put along these mountains others are more likely to follow. Thus the placement of this line will determine the future of the Deep Creek range	Refer to Chapter 4 for a discussion of cumulative effects.
100965	SANDY & DUSTIN WEBSTER		It is my understanding that buried transmission lines are now being utilized in many areas. Burying the transmission lines would alleviate my fears of view destruction of the Deep Creek Range. The feasibility of buried lines must be addressed for this project. The BLM must address new technology available. Transmission lines have already destroyed the view in many areas of the original Shoshone-Bannock homeland. This cannot be allowed to continue. Burial of the Gateway Transmission line must be seriously considered.	Refer to section 2.6 for a discussion of burying the lines. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in section 2.6) and the much greater cost.
100966	KAREN STEENHOF		I strongly support the Phased Decision Approach, which will allow more time to review and evaluate alternatives for Segments 8 and 9.	Your support for a phased decision is noted. The BLM has decided to follow the phased decision approach in Segments 8 and 9 of the Gateway West Project.
100966	KAREN STEENHOF		The BLM's preferred route, 9E, is completely unacceptable due to adverse effects on sage- grouse,, unacceptable impacts on private landowners	Alternative 9E generally avoids preliminary priority habitat (PPH) for sage-grouse but does cross general habitat.
100966	KAREN STEENHOF		BLM's preferred route, 9E, is completely unacceptable due to unacceptable impacts on private landowners	In regard to the private land issue: the BLM's Preferred Alternative (9E) and the County's preferred route (9D) both cross 3.3 miles of private land; approximately 95 percent of each route would be on public land. Alternative 9E affects slightly less agricultural land (1 acre vs. 2) than the County's preferred route. The difference between the two routes is not the amount of private land or (of agricultural land) crossed, but whose land would be crossed.

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100966	KAREN STEENHOF		unnecessary disturbance to soils	Refer to Section 3.15 for an analysis of the effects on soils.
100966	KAREN STEENHOF		unnecessary disturbance to shrubsteppe vegetation	Refer to section 3.6 for an analysis of the effects on vegetation
100966	KAREN STEENHOF		adverse impacts on scenic values	Refer to Section 3.2, Section 3.3, and Appendix G for an analysis of the effects on visual resources for both Alternatives 9E and 9D.
100966	KAREN STEENHOF		Additional time will allow BLM to verify that alternative routes through the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOPNCA) are compatible with goals of the enabling legislation and new NLCS regulations: i.e., that they truly enhance raptors within the SRBOPNCA. Alternative 9D likely will have no adverse effects on raptors and, if properly constructed, has the potential to enhance raptor populations. Alternative 9D follows an existing 138-kV line and an existing road so the footprint would be small. There would be no new habitat fragmentation, no adverse impacts to raptors, and effectively no additional visual impacts.	Your support for a phased decision is noted.
100966	KAREN STEENHOF		Alternative 9D follows an existing 138-kV line and an existing road so the footprint would be small.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100966	KAREN STEENHOF		The net effect of Segment 8E on raptors, their habitat, and their prey is still unclear; it appears that some shrub habitat and Lepidium populations may be affected adversely. Delaying a decision through a phased approach will allow BLM to assess issues associated with routing Segment 8 through the SRBOPNCA and to evaluate different alternative routes	Your support for a phased decision is noted.
100966	KAREN STEENHOF		Some of the comments I submitted on the Draft EIS have been addressed and others have not. The overall analysis of impacts on raptors is still flawed because it is based on “active and historical nests within 1 mile of proposed transmission line routes.” As I noted in my comments on the DEIS, whether a transmission line will adversely affect a nesting raptor depends on the species of raptor and the topography surrounding the nest (see below). It is erroneous to rank impacts of various alternatives based on the total number of known raptor nests in an incomplete database. Furthermore, the FEIS still implies that impacts on raptors nesting within 1 mile of the lines will be negative, which is not the case. For example, some Golden Eagles in and near the Project area nest successfully on cliffs in close proximity to the Pacificorp 500-kV transmission line (Steenhof et al. 1993).	Although detailed baseline data on raptor nests are not available for all areas, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives. Although site-specific impacts to raptors may vary and our knowledge of raptor behavior is not perfect, the types and scale of impacts should be similar to those analyzed.

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100966	KAREN STEENHOF		The FEIS now acknowledges that “Transmission lines could have some limited beneficial impacts to raptors” (3.10 p. 54), but it still fails to cite BLM’s own data that productivity of hawks and eagles nesting on transmission towers was as good as and sometimes better than that of those nesting in the Snake River Canyon. In some cases, transmission towers provided more secure nesting substrate than natural nesting sites. Towers offered protection from mammalian predators and wildfires—a benefit especially for Ferruginous Hawks that often nest on the ground or in low shrubs (Steenhof et al. 1993). Research showed that transmission line towers provided both new and alternative nesting substrate for raptors and ravens in and near the SRBOPNCA. A 500-kV line provided raptors and ravens an opportunity to nest in areas where nest sites were previously unavailable.	Steenhof et al. (1993) was included in the analysis; see Chapter 7 (References).
100966	KAREN STEENHOF		The new argument that “increased perching and nesting could lead to unsustainable levels of predation on small mammals, with the potential to decrease the raptors’ prey base” (3.10 p. 54 and earlier pages 29-30 of 3.10) is sheer speculation and is not supported by the scientific literature. All evidence suggests that mammalian prey populations regulate raptor populations and not the other way around. The SRBOPNCA, in particular, is a “bottom up” rather than a “top down” ecosystem. Ground squirrel and jackrabbit populations are limited by their food supply, and there is no evidence that raptors can deplete small mammal populations to a point where they would affect potential competing raptors (see Steenhof and Kochert 1985). The assertion in Section 3.10, page 29 that “increase[d] predation rates on jackrabbits in SRBOP has [sic] the potential to impact the population size and health of golden eagles in SRBOP “ makes no sense. Golden Eagles defend their foraging territories. New transmission lines within existing territories would not cause increased predation on rabbits, and any new eagles attracted to transmission lines would be taking jackrabbits outside existing eagle hunting territories, thereby enhancing rather than diminishing eagle populations	Your comments on raptor behavior are noted. The NLCS are concerned that the ground disturbance and new roads would fragment prey habitat (see Section 2.4.1.1) and this would not meet the enhancement requirement of the enabling legislation of the NCA, based on the mitigation offered at the time the FEIS was completed.
100966	KAREN STEENHOF		Again, a supplemental EIS prepared with input from raptor scientists would avoid these misconceptions	Noted
100966	KAREN STEENHOF		Protection and enhancement of raptor populations within the SRBOPNCA requires a careful consideration of locations where transmission lines cross canyon nesting areas. Although collision with wires has not been a problem for raptors on the SRBOPNCA benchlands, it could be a bigger threat when wires are close to canyon nesting sites. Young birds learning to fly and adults engaged in territorial defense and courtship could be far more susceptible to collision—especially when wires are below the cliff face. Alternative 9D follows the existing 138-kV line where it crosses the Snake River Canyon, just upstream from Swan Falls. It should have no additional adverse effects on raptors, particularly if the new 500-kV line could be stacked on the existing 138-kV line.	While Alternative 9D follows a small transmission line, the conductors would not be right next to the lower voltage lines. They would be at least a ROW width away and much higher. It is uncertain how much additional risk there would be.

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100966	KAREN STEENHOF		In contrast, Alternative 9G, which crosses the Snake River at the mouth of at the mouth of Sinker Creek and then crosses Sinker Creek canyon itself would have unacceptable impacts on cliff -nesting and riparian nesting raptors. It also would have unacceptable impacts on one of the most scenic segments of the canyon within the SRBOPNCA.	The BLM has not selected Alternative 9G.
100966	KAREN STEENHOF		Unfortunately, Segment 8 is competing with 9D for the safe canyon crossing, just above Swan Falls. BLM should consider an alternative route for Segment 8 that parallels the existing Pacificorp 500-kV line from Swan Falls Road to where it crosses the Snake River downstream from Guffey Butte. It is not clear why this route was not part of the original analysis.	It was added following discussions with local BLM and other stakeholders as the analysis was being conducted. It is normal for additional information and alternatives to be formulated during the analysis. This shows the value of holding meetings with local stakeholders and in asking the public for comments.
100966	KAREN STEENHOF		Section 3-10 of the FEIS cites numerous data and guidelines for raptor protection in specific areas of Wyoming, but references to the numerous important published and unpublished data about raptors, habitat, and prey species in the SRBOPNCA are still rare. I found no reference to the specific guidelines released by BLM's National Land Conservation System in August 2012. This points to the need for a harder look at the southwestern Idaho situation via a phased decision and possibly a supplemental EIS, prepared with input from people who are more familiar with raptor ecology in southwestern Idaho.	Your support for a phased decision is noted. The comment is correct in pointing out that not every available study was incorporated into this analysis. However, a wide range of studies was reviewed and incorporated, including research conducted by the commenter.
100966	KAREN STEENHOF		The selection of 9E as a preferred alternative is completely inconsistent with the BLM's commitment to conserve Greater Sage-grouse populations, and it appears to ignore the expanded discussion on page 71 of section 3.11 about the effects of increased raven populations on sage-grouse. Locating Alternative 9E outside of but along the edge of PPH and CHZ habitat will not reduce the rate of raven predation on grouse nests. Given that ravens forage several miles from their nests, roosts, and perches, sage-grouse nests within 15 miles of new transmission lines will be vulnerable to ravens that are attracted to transmission lines. Betting on the long-term effectiveness of perch deterrents is a poor strategy because very few perch deterrents have	Alternative 9E was revised between draft and final (see Section 1.1.1) and generally avoids preliminary priority habitat (PPH) for sage-grouse but it does cross general habitat.
100966	KAREN STEENHOF		In addition, recent research from eastern Idaho suggests that increases in raven populations are associated with increases in the amount of "edge" in shrubsteppe habitats. The FEIS correctly notes on page 29 of Section 3.10 that transmission lines cause fragmentation and increased edge effects	Noted. The concern over the edge effects and fragmentation resulted in the NLCS finding that the routes through the NCA would not meet the enhancement requirement of the enabling legislation, based on the mitigation offered at the time the FEIS was completed.
100966	KAREN STEENHOF		Page 1-5 of the FEIS states that:"A compatibility review of Public Law (P.L.) 103-64 and the purposes for which the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) was created was undertaken." This analysis resulted in the BLM's decision to support preferred alternatives outside the NCA. Unfortunately, the details of this analysis do not appear in the FEIS. It is unclear who conducted the analysis and on what information it was based. As noted above, much of the information in the FEIS about transmission line impacts on raptors is flawed and incomplete, and clearly, a transparent re-analysis of compatibility is warranted. A phased decision will allow this re-analysis to occur.	Senior NLCS staff in the BLM Washington office made this decision based on the project analysis documented in the draft administrative FEIS.

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100966	KAREN STEENHOF		The legislation that established the SRBOPNCA directed the BLM to manage the area to allow “for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats.” A properly routed transmission line would be consistent with the enabling legislation, particularly when it averts an alternative that could have devastating effects on another wildlife resource. The rationale for disallowing all new transmission lines in the SRBOPNCA is not based on scientific data. In fact, research data show that properly designed transmission lines can be compatible with and even beneficial for raptors. Alternative 9D could be a win/win situation for raptors, grouse, landowners, and utility customers. BLM and Idaho Power should engage local raptor experts and national organizations such as the Raptor Research Foundation to develop a strategy that will ensure enhancement of raptor populations within the SRBOPNCA. The strategy should include restoration of native shrubs and grasses, construction of nesting platforms on transmission towers, and research and monitoring to evaluate the effectiveness of enhancement efforts	Your opinion that Alternative 9D could be a win/win situation for raptors, grouse, landowners, and utility customers is noted.
100966	KAREN STEENHOF		The phased decision will allow time to develop such a strategy. The analysis should explore opportunities for potential alternatives based on WECC’s recent relaxation of separation requirements. In addition, alternative routes not analyzed in the FEIS should be considered, and Idaho Power and BLM also should re-evaluate whether two separate lines are needed in southwestern Idaho. The need for the line appears to be based on projections that are outdated.	Your support for a phased decision is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project. We are not aware of any changes in WECC criteria since the FEIS was completed. The BLM has no expertise in analyzing the need for transmission lines. It relies on other federal agencies for this. Refer to Chapter 1 for a discussion of the need for the project.
100967	NORM SEMANKO	IDAHO COUNCIL ON INDUSTRY & ENVIRONMENT	We need the additional transmission lines proposed in the Gateway West Final EIS because the existing grid is at capacity and additional infrastructure is needed to provide power to existing and future businesses in southern Idaho. We need to ensure that the electric grid is reliable and provides flexibility to move power efficiently to where it is needed.	Noted.
100967	NORM SEMANKO	IDAHO COUNCIL ON INDUSTRY & ENVIRONMENT	The definition of a straight line is the shortest distance between two points. That is an important concept to remember. Because the cost of the additional transmission will ultimately be paid by the system’s ratepayers, it is incumbent on the power companies and the federal government to propose transmission lines that are as close to the shortest distance as possible. It means that whenever possible those lines should be located in manner that minimizes impacts to both public and private property. Routes 8 and 9D were developed through a process that involved all interested parties from federal, state and local governments, private property owners, environmental organizations and other stakeholders. ICIE believes that these routes are the “shortest distance between two points” that provides the best balance between the impacts on the environment, impacts on private property and impacts on local communities.	Noted. While cost is a factor considered in the analysis, it is not the only factor. Often the resources that would be impacted by a straight line route are more important than the cost, to a point.

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100968	RAYMA CATES	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	Concerning the Gateway West Final EIS, Segments 5 and 7 I am a member of the Power County Task Force. I am very disappointed that the BLM did not do any work on discussing the feasibility of incorporating underground lines into the Gateway West project EIS. I attended a presentation on underground lines and was impressed with the underground technology that is now available and in use in other areas. The BLM should be open to examining new technology. Underground lines would likely eliminate the controversy involved with placing Gateway West on privately owned land. The BLM must be open to new ideas. Underground placement of power lines must be studied.	Underground technologies are discussed in Section 2.6. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
100968	RAYMA CATES	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	The Deep Creek Mountains are a great resource for Power County. Above ground placement, whether on private or public land, will greatly diminish this resource. This is another reason underground placement must be carefully considered.	Your comments on the importance of the Deep Creek Mountains are noted. The BLM agrees and did not select the Proposed Route through the Deep Creek Mountains.
100968	RAYMA CATES	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	The final EIS places almost the entire Gateway West project in Power County on private ground. Our County Task Force does not agree with placing public transmission lines on private land against the desires of landowners. It appears to me that the BLM has tried to avoid the unpleasant topics of sage grouse and visual effects on view sheds by pushing the line onto public ground. Much of the transmission line in Power County, as proposed in the final EIS, would travel just off of public ground on private land. Thus as proposed, the line would have the same effects on sage grouse and view sheds as if it was placed on private ground. The only differences are these negative effects can apparently be ignored by the BLM if the line runs across private ground. Making the EIS process easier for BLM is not an excuse for placing a transmission ground on private ground. In Idaho, counties have the authority to site public transmission lines. Thus, the path Power County selected for Gateway West should have been honored.	The County's objection to the Preferred Route in the county are noted. Contrary to the comment, nothing about the Gateway West process has been easy for the BLM. Please note that this is not a BLM project. As stated in Chapter 1, "The BLM has received ROW applications from the Proponents and must determine whether to allow the use of the National System of Public Lands for portions of Gateway West. In accordance with FLPMA and the BLM's ROW regulations, 43 CFR Part 2800, the BLM must manage public lands for multiple uses that take into account the long-term needs for future generations of renewable and non-renewable resources." The BLM does not have the option of ignoring its obligation to protect resources on the public lands it manages. It has tried to balance this need with other Project impacts. Most of the Project is on public lands.
100968	RAYMA CATES	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	I would like to note that the maps utilized for sage grouse habitat siting have not seemed to be consistent among agencies and that Fish and Game officials have confessed to me that sage grouse leks are often present, but not marked on private land. I know that numerous leks were recently documented in the Arbon Valley area. This documentation was done at the request of landowners who wanted to enroll land in the SAFE, Conservation Reserve Program, and needed to have documentation of a lek within a certain distance to qualify. I feel that the maps being used for Gateway West are not entirely accurate with conditions in the field. I also think further research is needed to determine the effect transmission lines actually have on sage grouse survival.	While maps of sage-grouse leks are not perfect, the BLM believes sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives. The BLM has no authority to protect habitat on private lands; it has an obligation to protect habitat on the land it manages.
100968	RAYMA CATES	POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE	On a personal note, I have lived along the foothills of the Deep Creek Mountains for over twenty years. I walk in these foothills almost daily and greatly enjoy the view. I have worked for the federal government in several different positions and so I understand that to the BLM this	The BLM makes decisions for the land it manages. It has determined that burying the lines across the Deep Creek Mountains is not a reasonable option, given the amount of ground disturbance this would require. Disturbance much greater than

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			transmission line is likely just another project, with deadlines, that must be seen to completion. However, to the people of Power County, this is our homes nestled in the foothills of a beautiful place and in many cases, it is our livelihood. The placement of this transmission line will create a new electric transmission corridor and if placed overhead, will affect the scenery and the quality of life for our grandchildren, great grandchildren and great-great grandchildren. This is why studying underground placement and working with Power County for final placement of Gateway West is so important.	what is required for an above ground line. It is not up to the BLM to determine the siting and permitting requirements on private land. Permitting on private land is under state and county authority.
100969	BILL SHELMAN, TRINA SHELMAN		We strongly SUPPORT segment 8 and segment 9D	Your support for Segment 8 and Alternative 9D is noted.
100969	BILL SHELMAN, TRINA SHELMAN		OPPOSE the “BLM Preferred Routes” (segment 8B and 9E) as expressed in the Final Environmental Impact Statement.	Your opposition to Alternative 8B and Alternative 9E is noted.
100969	BILL SHELMAN, TRINA SHELMAN		Should the BLM’s Preferred Routes come to fruition, the citizens and governmental authorities of Idaho’s reached collaborative consensus would be turned back as meaningless by Washington DC contrary to the EIS statement under Preferred Alternatives (Chapter 2 pg. 38) that “... decisions on siting and construction requirements on non-federal lands are under the authority of state and local governments”.	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
100969	BILL SHELMAN, TRINA SHELMAN		The “enhancement requirements” to the Birds of Prey can be met within the construction processes of the project through the Morley Nelson Birds of Prey defined area.	The enhancement requirements cannot be met through the construction process.
100969	BILL SHELMAN, TRINA SHELMAN		Segment 8B and 9E (BLM preferred routes) would burden private citizens with costs of millions of dollars.	Both routes are longer and are expected to cost more to build. Alternative 8B would cross more private land than the proposed route through the NCA; however, Alternatives 9D and 9E both cross 3.3 miles of private land. Approximately 95 percent of each route is on public land.
100969	BILL SHELMAN, TRINA SHELMAN		Alternate 8B narrowly threads a 500 KV transmission line through 5 private residences, potentially affecting property values and increasing the likelihood of wildfires.	The route shown in the EIS is based on indicative engineering; it is not a designed route. It would be up to the county to determine permitting and setback requirements on private land.
100969	BILL SHELMAN, TRINA SHELMAN		Alternative 8B is 0.5 mile longer than the comparison portion of the Proposed Route and would cross 24.6 more miles of private land and 25.8 fewer miles of BLM-managed land” (EIS Section 3.17 pg. 100 Land Ownership).	Noted. This is disclosed in Table 2.8-6.
100969	BILL SHELMAN, TRINA SHELMAN		Alternative 8B, which is part of the Preferred Route, would pass within 1,000 feet of 60 residences versus 12 for the comparison portion of the Proposed Route. ... Twenty-four of the residences within 1,000 feet of Alternative 8B are located within 300 feet of the proposed ROW centerline versus 2 for the comparison portion of the Proposed Route” (EIS Section 3.17 pg. 107 Number of Residences within 1,000 feet and 300 feet – Segment 8).	The route shown in the EIS is based on indicative engineering, it is not a designed route. The design route agreed to by the county (which has permitting authority for transmission lines on private land) may differ.
100969	BILL SHELMAN, TRINA SHELMAN		Other accommodations have been made elsewhere for private residences – “... the route angles northwest away from the existing 230-kV corridor at the Gooding County/Elmore County line for approximately 7 miles to avoid impacts to a residence in the Clover	The route shown in the EIS is based on indicative engineering, it is not a designed route. The design route agreed to by the county (which has permitting authority for transmission lines on private land) is likely to differ from the route shown in the FEIS.

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			Creek area". (EIS Chapter 2 pg. 75 under 2.4.9.2 Proposed Route (8, 8a, 8b, 8c, 8d, 8e, 8f, 8g, 8h, 8i, 11).	
100969	BILL SHELMAN, TRINA SHELMAN		The South Pleasant Valley residences affected by Alternate 8B are not future planned developments but long existing family residences, unlike the area mentioned in EIS Section 3.4 pg. 83 - The Osprey Ridge development proposal has a recorded agreement with the City of Kuna; however, the City had not received an application for development as of September 2012."	Noted.
100969	BILL SHELMAN, TRINA SHELMAN		The potential for increased wild fire activity due to the transmission line proposed for Alternate 8b is acknowledged multiple times in section 3.17 of the EIS yet there is no defined fire protection for the private family homes affected on South Pleasant Valley Road "the Project area often experiences fire ignitions that quickly escalate to large fires, due to fuel types including annual grasses and brush" (EIS Section 3.17 pg. 29 Fire Management). "the proposed transmission line would increase the potential for ignitions along the corridor, particularly during summertime red flag warnings" (EIS Section 3.17 pg. 58 Fire Management).	The FEIS requires a fire plan be prepared. See the POD attached to the ROD.
100969	BILL SHELMAN, TRINA SHELMAN		An alternative suggestion to the South Pleasant Valley road section of Alternate 8B is to follow the existing transmission lines near Kuna Mora road (potentially named the Danskin to Hubbard Substation 230 line). Although the need for "physical separation is needed due to existing transmission line congestion (multiple lines in the same area) and wildland fires resulting in outages" (EIS Chapter 1 pg. 28 Table 1.3-3 Segment 8—Midpoint to Hemingway) there are other areas where multiple transmission lines exist (for example 5 transmission lines north of I-84 in the Boise – Mountain Home vicinity).	Actual siting of the line on private land would be up to the county; however reliability constraints would need to be met.
100970	CURTIS R DERR		oppose the "BLM Preferred Routes" (segment 8B and 9E and proponent's proposed segment 9) as expressed in the Final Environmental Impact Statement.	Your opposition to Alternative 8B and Alternative 9E is noted.
100970	CURTIS R DERR		The BLM Preferred Routes will burden private citizens with millions of additional costs. Please listen to the citizens affected by this project. Please consider the impact on the local homeowners!	Both routes are longer and are expected to cost more to build. Alternative 8B would cross more private land than the proposed route through the NCA; however, Alternatives 9D and 9E both cross 3.3 miles of private land. Approximately 95 percent of each route is on public land.
100970	CURTIS R DERR		I strongly support segment 8 and segment 9D	Your support for Segment 8 and Alternative 9D is noted.
100971	CHARLES A LENKNER		I am writing this in respect to what is being called the Gateway West Transmission Line Project. Were I to judge from the information that I have gotten on this matter one would assume that this was a US BLM project. But why would the BLM undertake to initiate a transmission line since at least ostensibly, as far as it is known to the general public and taxpayers generally the BLM is not in the power generation, power transmission or sale of power game. It would only be fair and forthright were the public to be told specifically just WHO plans to profit by the very extensive and costly project.	As stated in Chapter 1, "The BLM has received ROW applications from the Proponents and must determine whether to allow the use of the National System of Public Lands for portions of Gateway West. In accordance with FLPMA and the BLM's ROW regulations, 43 CFR Part 2800, the BLM must manage public lands for multiple uses that take into account the long-term needs for future generations of renewable and non-renewable resources."

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100971	CHARLES A LENKNER		I think that I am clear on the fact that no one in Idaho will be receiving any power from this project. If that is correct then I say route the damn thing most directly through and to those who will. For example if California is the target for delivery of the power from this development there are several options. Shoot it right out of Wyoming through Utah and Nevada (places where population growth is very likely also planned/ projected and where power needs will of necessity increase) say aimed right at Valmy and then to the Golden State. Or if California and the Northwest Coast are the market locations then just ship the coal there as if it were going to China for export and generate the power from burning the coal right where it will be used. Think of the energy saving just from the reduction in electrical power loss over all those miles of line. And then also the customers there could enforce proper regulations to make sure that the new coal burning plants had the most stringent pollution reducing designs and operating modes.	As stated in Chapter 1, the purpose includes upgrading the national power grid and providing power to the Proponents' service areas. Idaho Power's service area is in Idaho. Rocky Mountain Power's service area includes customers in several states.
100971	CHARLES A LENKNER		If the "power elite" behind this project persist in having their way with commonly held resources and places with the Windstar to Boise route plan then the following comments are offered by me. Just how can you/ BLM or the whole consortium be pretending to deal with "the final EIS" when from the last map that I have been sent still has multiples of various colored lines on multitudinous trajectories. Which route is the FINAL EIS for? I think it would only be fair to specify same to we the 'share holders', minimally.	Please refer to Section 1.1.1 for the many changes between the draft and final EIS. Some routes have been dropped, one has been added, and many have had small changes, often to avoid residences or important habitat. The BLM will continue to work with local interests to search for a consensus route where there is controversy.
100971	CHARLES A LENKNER		Picking between the lines and segment trajectories in this case, I strongly recommend segments 6 & 8 between American Falls and Ada County.	Your support for Segments 6 and 8 is noted. The segments are not alternatives to each other. Segment 6 is the rebuilding of an existing line and no alternatives are being considered for this segment. There are several alternatives being considered for Segment 8.
100971	CHARLES A LENKNER		Being an owner of property adjacent to segment 9 south of Twin Falls I am against this route for many reasons.	Your opposition to Segment 9 is noted.
100971	CHARLES A LENKNER		In respect to the sagehen question I am all for the birds and affording them protection to the point of assuring recovery. I do suspect that Gateway will be less an issue in their survival and prosperity than would reduction of bromus tectorum, range fires, natural caused and "cowboy lightening" caused and range abuse thru poorly managed subsidized grazing.	The analysis found that habitat loss due to fires and other factors, including development, are major factors in the sage-grouse decline.
100972	MELODY LENKNER		Initially I am opposed to the whole project of running transmission lines through Idaho that don't benefit Idaho, but I guess this is a moot point at this time.	Your opposition to new transmission lines in Idaho is noted.
100972	MELODY LENKNER		Secondly, I find it very difficult to comment on the "proposed" route when there is no clear proposed route.	There is a proposed route for each segment (the segments are not alternatives; the Proponents want to build all 10 segments). The Proposed Routes are shown in red on the maps in Appendix A and described in Section 2.4.
100972	MELODY LENKNER		We own 360 acres by the Cedar Hill proposed route. Why trash the scenic South Hills with giant transmission lines when there is an option	The area north of the river has several lines (see Figure A-11 in Appendix A) and is congested. One of the main reasons for the

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			for crossing north of the Snake River using a less scenic and more direct route	Project is to increase reliability by place line a new line in a different location.
100972	MELODY LENKNER		For this reason, I oppose the proposed route running from #7 through #9	Your opposition to these routes is noted.
100973	FRANK & LORNA GILLETTE		I have heard of the impact on the sage grouse but very little about a study of the impact a line would have on our financial and health issues. We are living in a housing development at the foot of the south hills, Water Canyon.	Effects on health are discussed in Sections 3.21 and 3.22, and economic effects in Section 3.4.
100973	FRANK & LORNA GILLETTE		I work on the computer 8 to 10 hours a day. I enjoy watching television. I understand these lines would effect the reception of both of these things.	Effects on reception are discussed in Section 3.21.
100973	FRANK & LORNA GILLETTE		I don't need to have a study done to tell me it would effect the value of our property.	The effect on property values is included in Section 3.4.2.2. This discussion focuses on property crossed by the transmission line. However, one study found that properties within 50 feet of a transmission line have property values that are 6 percent to 9 percent lower than the values of comparable properties. It also found that this reduction in value tends to decrease over time. A recent study in Montreal found that direct views of a transmission line tend to reduce residential property value by roughly 10 percent (Des Rosiers 2002). Other studies found lower effects on property values.
100973	FRANK & LORNA GILLETTE		Put the lines underground then it would be an eye sore, the grouse would be happy and so would the rest of us.	The BLM makes decisions for the land it manages. It has determined that burying the lines across public lands is not a reasonable option, given the amount of ground disturbance this would require. Disturbance much greater than what is required for an above ground line. It is not up to the BLM to determine the siting and permitting requirements on private land. Permitting on private land is under state and county authority.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	The members and board of GEAS are strongly in favor of routing options that have minimal adverse impacts on birds and native plant communities that support birds and wildlife. We feel that transmission line placement should seek optimum compromise among ecological, social, and regulatory interests.	Noted.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	We are also strongly in favor of a phased approach to decision making for this project (page 1-9). We recognize that some segments of the entire line are likely to have minimal environmental impacts, or at least the impacts are well understood and handled. We feel this is not the case for proposed segments 8 and 9 in the area of SRBOP. We feel that the extensive science on raptor and sage-grouse ecology and habitat associations in the area has been largely ignored and that local expertise on both taxa has not adequately been engaged.	Your support for a phased decision for Segments 8 and 9 is noted. We do not agree that science on sage-grouse and raptors has been ignored in this analysis. The sage-grouse analysis, which includes the HEA, is a state-of-the-art analyses. Although detailed baseline data on raptor nests are not complete, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives. Although site-specific impacts to raptors may vary and our knowledge of raptor behavior is not perfect, the types and scale of impacts should be similar to those analyzed.

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100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	In SW Idaho, there are no routes that satisfy all publics and criteria and some compromises are going to be necessary. That said there are a few logical compromises that lead to routes which: (1) have minimum impacts on key wildlife and habitats, (2) minimize visual impacts to residential areas, and (3) adhere to regulations and standards set forth by the many policy documents guiding transmission line placement and natural resource conservation. Specifically: The critical decision regarding segment 9 (particularly segments west of reference point 9g on Fig. A-11) is among segments that run through native sagebrush habitat south of population centers in northern Owyhee County (Alternative 9E, Fig. A-11), segments that run through those population and agricultural centers (Proposed Route, Fig. A-11), and routes that cross the Snake River and pass through SRBOP (i.e., Alternative 9D, Fig. A-11). Of these, GEAS recommends that segment [9n, 9o, 9p] is clearly the superior choice because it represents the best compromise among residential and wildlife interests.	The comment is correct in stating that there are no routes without impacts. The route between 9n and 9p (which connects to 9D) crossed the NCA. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The main issue is not the fact that towers would harm raptors but rather the ground disturbance and new roads they would require.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	The Proposed Route (i.e., through reference points 9h, 9i, 9j; Fig. A-11) is a nonstarter as it impacts extensive agricultural, residential, and visual resources in the Oreana and Murphy areas. We believe that you received extensive feedback during draft phases of the EIS and there is no further reason to elaborate here.	Alternative 9E was revised to avoid Oceana and Murphy. It would cross 3.3 miles of private land, the same as the route the County favors through the NCA.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	Alternates routed through SRBOP (principally Alternative 9D in our opinion) are much more conducive to conservation and political compromise and, in the opinion of GEAS, the most suitable option for Segment 9. We recognize the value of SRBOP to raptors, its status as the densest raptor nesting area in the world, and the enabling legislation that SRBOP “provides for the conservation, protection, enhancement, of the raptor populations and habitats” in the conservation area. We disagree, however, with the FEIS finding that routing a line through SRBOP is inherently detrimental to raptors. In fact, we propose there are multiple benefits to routing a line there, especially Alternative 9D which would parallel an existing 138 kV transmission line and existing road. These benefits could actually enhance raptor populations and habitats if a holistic, ecological approach is followed while planning and placing the line. Moreover, there are no visual or residential impacts. The single impediment to such placement is disagreement with guidance set forth in recent BLM planning and management manuals.	Your support for 9D is noted.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	Siting the 500-kV line through native sagebrush habitat to the south of northern Owyhee County, at 9E, would be an egregious ecological and political error and we most strongly urge you to abandon this option as the “BLM Preferred Alternative.” Siting a line here (even just planning such a line) would be disastrous to conservation efforts for greater sage-grouse. As you well know, sage-grouse are currently a candidate species for listing under the Endangered Species Act and the U.S. Fish and Wildlife Service is under court order to make a final decision on the	Alternative 9E generally avoids preliminary priority habitat (PPH) for sage-grouse but does cross general habitat. The BLM will continue to work with local interests to search for a consensus route.

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			species in September 2015. The landscape 9E is routed through skirts designated Priority Sage-grouse Habitat (IDFG; see: https://www.sciencebase.gov/catalog/item/4fc6706ee4b0f02c1d6a8099) and slices through occupied and suitable (though “undesigned”) sage-grouse habitat including several well-known and long-occupied lek clusters. From an ecological perspective, the 9E alternative would effectively reduce habitat connectivity of sagebrush habitat north of 9E with the population centers to the south – connectivity deemed important by every landscape scale assessment for the area (i.e., Stiver et al. 2006, Knick and Connelly 2011, Knick et al. 2013). From a political perspective, planning on Route 9E is equivalent to project suicide. If sage-grouse are listed in 2015 there is virtually no way route 9E would be acceptable, and even if BLM and the Proponents chose to proceed with construction, lawsuits would surely ensue.	
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	We support the FEIS contention that “transmission lines could have some limited beneficial impacts to raptors” (3.10). Field research collected at SRBOP indicate that transmission line towers provide new and alternative nesting substrate for raptors and ravens and that productivity of hawks and eagles nesting on towers was as good as and sometimes better than that of those nesting on nearby natural substrates (Steenhof et al. 1993). Transmission towers offer several enhanced benefits to nesting raptors including: a more secure nesting substrate and protection from mammalian predators and wildfires. Therefore, local data (that was not addressed in the FEIS) suggest a 500-kV line could enhance raptor nesting opportunity in the Conservation Area and align with the enabling legislation. Further it is highly unlikely that “increased perching and nesting could lead to unsustainable levels of predation on small mammals, with the potential to decrease the raptors’ prey base” (3.10 p. 54). Basic wildlife ecology (i.e., Leopold 1933) and nearly every study since (i.e., Craighead and Craighead 1975) informs us that prey populations regulate predators. Proposing that raptors could decimate a healthy prey base is unfounded. Two real concerns regarding adverse impacts on raptors from a new transmission line in SRBOP are placement where the line crosses the Snake River canyon and direct effects on small mammals and songbirds inhabiting the ROW. Some of those direct effects on mammals and birds (and their role as raptor prey) would be offset by recommended habitat restoration mitigation (see below), however fragmentation effects of the expanded ROW would need to be addressed. The second concern is the potential for raptor collision with wires especially when wires are close to canyon nesting sites; adults (in courting flight, foraging, and defending territories) and young birds (learning to fly) may be susceptible to collision, especially when wires are below the cliff face. We suggest that alternative 9D follows the existing 138-kV line where it crosses the Snake River Canyon, just upstream from Swan Falls. There it should	The EIS included research in the local area, such as Steenhof et al. (1993). The issue in the NCA is not that the towers would harm raptors, but the level of vegetation disturbance and new roads. The proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes to offset this disturbance were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.

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			have minimal adverse effects on raptors especially compared to other alternatives (9G for example). In contrast, we see great potential for the 9D route to enhance raptor habitat in SRBOP if the installation were carefully planned and involved habitat restoration specialists during planning and construction. SRBOP has a 30-yr history of habitat degradation due to successive fires leading to loss of shrub cover. By pairing sound fire management practices with thoughtful installation, the addition of 9D to SRBOP could improve landscape-scale fuels and fire management, enhance response time for suppression crews, and begin the sorely needed restoration process that would improve small mammal, songbird, and raptor habitat in SRBOP. Recently published manuals guiding National Conservation Area management (Manuals 6100 and 6220) call for mitigation of impacts of Rights-Of-Way applications. We suggest that mitigation is more appropriate and necessary within SRBOP than in adjacent areas. Therefore placement of 9D in the SRBOP can enhance raptor nesting, prey, and habitat conditions and therefore is consistent with enabling legislation.	
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	We support the FEIS contention that “transmission lines could have some limited beneficial impacts to raptors” (3.10). Field research collected at SRBOP indicate that transmission line towers provide new and alternative nesting substrate for raptors and ravens and that productivity of hawks and eagles nesting on towers was as good as and sometimes better than that of those nesting on nearby natural substrates (Steenhof et al. 1993). Transmission towers offer several enhanced benefits to nesting raptors including: a more secure nesting substrate and protection from mammalian predators and wildfires. Therefore, local data (that was not addressed in the FEIS) suggest a 500-kV line could enhance raptor nesting opportunity in the Conservation Area and align with the enabling legislation. Further it is highly unlikely that “increased perching and nesting could lead to unsustainable levels of predation on small mammals, with the potential to decrease the raptors’ prey base” (3.10 p. 54). Basic wildlife ecology (i.e., Leopold 1933) and nearly every study since (i.e., Craighead and Craighead 1975) informs us that prey populations regulate predators. Proposing that raptors could decimate a healthy prey base is unfounded. Two real concerns regarding adverse impacts on raptors from a new transmission line in SRBOP are placement where the line crosses the Snake River canyon and direct effects on small mammals and songbirds inhabiting the ROW. Some of those direct effects on mammals and birds (and their role as raptor prey) would be offset by recommended habitat restoration mitigation (see below), however fragmentation effects of the expanded ROW would need to be addressed. The second concern is the potential for raptor collision with wires especially when wires are close to canyon nesting sites; adults (in courting flight, foraging, and defending territories) and young birds (learning to fly) may be susceptible to	Your comments on how transmission lines affect raptors is noted, as is your suggestion that mitigation is more appropriate and necessary within SRBOP than in adjacent areas. The BLM will continue to work with local interests to search for a consensus route.

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			collision, especially when wires are below the cliff face. We suggest that alternative 9D follows the existing 138-kV line where it crosses the Snake River Canyon, just upstream from Swan Falls. There it should have minimal adverse effects on raptors especially compared to other alternatives (9G for example). In contrast, we see great potential for the 9D route to enhance raptor habitat in SRBOP if the installation were carefully planned and involved habitat restoration specialists during planning and construction. SRBOP has a 30-yr history of habitat degradation due to successive fires leading to loss of shrub cover. By pairing sound fire management practices with thoughtful installation, the addition of 9D to SRBOP could improve landscape-scale fuels and fire management, enhance response time for suppression crews, and begin the sorely needed restoration process that would improve small mammal, songbird, and raptor habitat in SRBOP. Recently published manuals guiding National Conservation Area management (Manuals 6100 and 6220) call for mitigation of impacts of Rights-Of-Way applications. We suggest that mitigation is more appropriate and necessary within SRBOP than in adjacent areas. Therefore placement of 9D in the SRBOP can enhance raptor nesting, prey, and habitat conditions and therefore is consistent with enabling legislation.	
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	GEAS acknowledges that siting Segment 8 is a much more challenging task. We recommend that this be a major focus of subsequent planning and discussion in the phased approach we support.	The BLM will continue to work with local interests to search for a consensus route. Siting Segment 8 will be part of that process.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	Selecting Alternative 8D would require a new road which would increase fragmentation and possibly affect sensitive <i>Lepidium</i> sites.	Road construction and improvement, as well as other clearing, would be needed in the NCA. Mitigation for this disturbance is the issue which, to date, has not been resolved.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	Further, 8D poses problems associated with the Idaho National Guard Orchard Training area	The EIS discusses how the various alternatives effect the IDANG training area.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	GEAS acknowledges that siting Segment 8 is a much more challenging task. We recommend that this be a major focus of subsequent planning and discussion in the phased approach we support. We contend that siting Segment 8 in the SRBOP (i.e., Alternative 8D) would not have the same multiple benefits as Alternative 9D (described above). Selecting Alternative 8D would require a new road which would increase fragmentation and possibly affect sensitive <i>Lepidium</i> sites. Further, 8D poses problems associated with the Idaho National Guard Orchard Training area and with the location of its crossing of the Snake River. We also recognize that Alternative 8B poses significant visual, residential, and agricultural impacts in and near the communities of Kuna and Melba, ID. On the other hand, our understanding of the need for a northern Segment is in part to “serve loads along the way” (ES-4). If so, the case could be made that residential and agricultural concerns must compromise on some siting decisions, especially if other compromises (i.e., in Segment 9) avoided residential impacts. We feel	The BLM will continue to work with local interests to search for a consensus route. Siting Segment 8 will be part of that process.

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			these points need to be considered during 'phase 2' of a phased approach, which we especially support regarding Segment 8 planning.	
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	Our final comments involve an improved process during subsequent phases of the phased approach. First, BLM appears to have ignored several of their own planning manuals (i.e., Manual 6100 and 6220) during FEIS development. While this omission is perplexing there would be time to rectify it during subsequent planning. Second, the SRBOP and surrounding area is one of the best-studied areas in the western US, and SRBOP is one of the most cared for reserves. This is reflected in its designation as the Morley Nelson Snake River Birds of Prey NCA. Mr. Nelson and dozens of colleagues have provided ecological and biological data on raptors since the 1960's. The area is well understood. In addition, the Idaho Department of Fish and Game, U.S. Fish and Wildlife Service, U.S. Geological Survey, Peregrine Fund, Army National Guard and many graduate projects have studied sage-grouse and other sagebrush obligate wildlife in an around SRBOP for decades. GEAS implores the BLM to consider this very localized and available research data as they consider siting the Gateway line in southwest Idaho. Dozens of local wildlife science experts working in the public and private sector are available for consultation. The members of Golden Eagle Audubon Society urge the BLM to engage these experts as they conduct subsequent planning in the area.	This comment is not correct. Manual 6220 states: "District and Field Manager shall: Ensure that all activities on Monument and NCA lands are consistent with the relevant designating legislation..." Similarly, Manual 6100 states: "District and Field Managers...shall: Ensure that all activities within NCLS units are consistent with the relevant designating legislation or proclamation, BLM NCLS policy and guidance, and approved land use plan decisions." This is the reason that the BLM did not select the Proposed Routes or other alternatives for Segments 8 and 9. Our review of the EIS indicated that only the Preferred Routes would meet the intent of the enabling legislation. The BLM considered and complied with the direction under Part E of Manual 6220 (Rights-of-Way and Transmission and Utility Corridors) and Part J (Lands and Realty) in selecting the preferred route. A point-by-point review of the direction in Part E and J demonstrates that the BLM complied with this direction. As required by Manual 6220, Part E, subpart 5, the BLM "to the greatest extent possible" located the routes in existing corridors and will require adequate mitigation.
100974	SEAN FINN	GOLDEN EAGLE AUDOBON SOCIETY	We contend that siting Segment 8 in the SRBOP (i.e., Alternative 8D) would not have the same multiple benefits as Alternative 9D (described above). Selecting Alternative 8D would require a new road which would increase fragmentation and possibly affect sensitive <i>Lepidium</i> sites. Further, 8D poses problems associated with the Idaho National Guard Orchard Training area and with the location of its crossing of the Snake River.	Your comment that Alternative 8D would have different effects than Alternative 9D is noted.
100975	GREGORY BOTTELBERGHE		Not a good idea to put power lines on or near a recreation site for glider type of recreation flight. there is not very many sites at all to fly gliders. Glider pilots will fly even if the power lines are there. Eventually one of them will be in the wires. I'm sure it wouldn't be too far to move them to accomodate.	Noted.
100976	STEVE & DARLENE BILLS		I, along with my fellow residents and citizens of Melba and the state of Idaho, ask that The Gateway West Transmission Line corridor once again be placed on public lands in segments 8 and 9 running through the existing right of way in the Snake River Birds of Prey area in compliance with the federal 2005 Energy Act, and to avoid a great injustice and economic injury to the members of our communities.	All routes considered in the FEIS are in compliance the the 2005 Energy Act. However, the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100976	STEVE & DARLENE BILLS		I'm a Melba land owner on the BLM's proposed corridor for the Gateway West Project . I strongly SUPPORT segment 8 and segment 9D	Your support for Segment 8 and Alternative 9D are noted.

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100976	STEVE & DARLENE BILLS		strongly OPPOSE the “BLM Preferred Routes” (segment 8B and 9E and proponent’s proposed segment 9) as expressed in the Final Environmental Impact Statement.	Your opposition to Preferred Routes 8B and 9E are noted.
100976	STEVE & DARLENE BILLS		The BLM’s preferred route transits a mere quarter of a mile north of the town of Melba. The BLM’s preferred corridor running along Melba Road conflicts dramatically with Melba’s Comprehensive Plan for future residential and commercial growth for the town. Because of the geographical layout of the city, the natural growth area for Melba is predominately to the north and west, directly in the path of the proposed transmission line. Rock rim cliffs to the south of the city provide a natural barrier to growing the city in the southern direction. In addition, Melba’s natural growth will be towards highway 45 one mile to the west to provide easy access to the city from a major throughway. The combination of the rock rim cliffs on the southern edge of town and the proposed Gateway West transmission line on the city’s northern edge will effectively hem in Melba’s potential future growth.	The route displayed in the FEIS is based on indicative engineering; it is not a designed route. It would be up to the County and the Proponents to determine the actual route on private lands, including setbacks for residences. Permitting on private land is under the county's authority, not the BLM's.
100976	STEVE & DARLENE BILLS		Additionally, the unsightly 180 foot transmission towers running along the city’s northern boundary will dramatically impact the desirability of living in Melba.	The EIS acknowledges that the transmission line adversely affects visual resources. Appendix E includes photo simulations of the Preferred Route between Kuna and Melba.
100976	STEVE & DARLENE BILLS		This project has the prospect of killing the town’s future growth potential and saddling current residences and businesses with millions of dollars of unreimbursed personal financial losses resulting from the devaluation of their properties, current and potential. It would be difficult to overstate the negative impact to the city of Melba of running the Gateway West 500kV transmission line through the northern boundary of our city.	Effects on growth are discussed in Section 3.4
100976	STEVE & DARLENE BILLS		The city government of Melba and its residents were unaware of this project until the spring of 2009. We were left out of the initial determinations and decisions to place the corridor along our northern boundary and through private property. In 2009 through 2012, working with the state of Idaho, the local governing bodies of Ada and Canyon counties, and the city of Kuna, the residents of Melba worked to find a solution that properly placed this public utility on public land through the existing right of way of the 500 kV transmission line that currently transits the Snake River Birds of Prey. All of this was done properly in compliance with the 2005 Energy Act (section 368 Energy Right-of-Way Corridors on Federal Land) which requires the placement of such power transmission lines on public lands and not private property. This agreement with the BLM and the citizens of Idaho was ultimately set aside by a Washington political appointee in the fall of 2012, subverting the will of the citizens of Idaho and violating federal law.	The first public scoping meetings for the Project were held in June of 2008: one was in Murphy and one in Boise. The first meeting with the county government was in May of 2008. Alternatives were formulated following scoping. No decisions on selecting a preferred route were made before 2012.
100976	STEVE & DARLENE BILLS		Additionally, much has been published regarding the environmental impact on the Birds of Prey area. The science supports placing the 500 kV power line in the existing power-line right of way that currently	The issue involves the effects to prey species due to habitat fragmentation caused by construction disturbance and new roads associated with the routes in the NCA, not that towers would

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			passes through the Snake River Birds of Prey. NCA Enabling Legislation (Public Law 103-64 August 4th 1993) SRBOP NCA provided for continued and future use for grazing, continued military use (the Orchard Training Center), and continued and future use of hydroelectric generation and transmission. The Law further stipulates that the Snake River Birds of Prey NCA has been adequately studied and is not suitable for wilderness designation.	harm the raptors. To date, the Proponents have not offered adequate mitigation for these impacts. The BLM will continue to work with local interests to search for a consensus route.
100978	NEIL MILLER, JENNIFER MILLER		Please consider an alternative route for this transmission line that will protect sage grouse habitat and our National Historic Trails.	Effects on trails are disclosed in Section 3.3, and effects on sage-grouse in Section 3.11. The decision makers must balance effects on trails and wildlife with effects on other importance resources. Mitigation for sage-grouse and trails is required.
100979	CORY TURNER		I am in opposition to the proposed Gateway west transmission lines running across the top of test hill at the base of the Albion foot hills. It would negatively affect our flying site and the view for the local residents as well. I strongly urge the BLM to find an alternate route with less impact to local residents and pilots.	Noted.
100980	BOB JANZEN		I hope to fly Test Hill someday. I hope that power lines are not put across or on top of the hill.	Noted
100981	KERRY MELANIE BOWEN		EIS Chapter: 2 Section Number: Page Number: -72, 73 Comment: I feel that there has been a lot of window dressing to pacify people living on the corridor segment 7. If this power line is for the public good, then use public property to route it over. There has been an alternative route that would run the line over more public land. The proposed route was ignored with the excuse that it was to expensive. If the builder would be required to pay market rates to rent or pay a use fee to private owners the alternative would be by far the cheapest route to use. It is my impression that the paper work is to difficult to use public property. So ignore the wishes of the people and put the line the easiest and cheapest way.	The route the County proposes is 30 miles longer than the BLM's Preferred Route, and would cost approximately \$60 million dollars more to build. In addition, and more importantly, it would adversely impact approximately 1,400 acres of preliminary priority habitat (PPH) for sage-grouse, approximately 10 times as much as the Preferred Route.
100982	GERRY WINGENBACH		Recreation is a huge, huge reason why many of us live and love Utah. It's also a multi-billion-dollar business. You're wrong to take away a prime paragliding site for power lines. You've got other options, paraglider pilots do not. Please consider another option for your power lines. Make it a win-win for everybody.	The Gateway West Project does not cross Utah. If this is a comment on a paraglider site in Idaho, then the concern is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the Project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100983	PETE SCHAEFER		I oppose the placement of power lines on Test hill. I am a paraglider pilot would like this site preserved for that use.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the Project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang-gliding site.
100984	JOHNNY DORNING		It would really be sad to see power lines installed along the "Test" Hill as this would be a major impact on the residences that live below and the local hanggliding/paragliding community. Please find another less	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties

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			"impactful" area to install these power lines.	into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang gliding site.
100985	REGINA ZIEGLGAENSBERGER		I know everyone is telling you please don't build it here because...that must be difficult. Sometimes I do wonder, if it wouldn't be possible to find a compromise for everyone involved, either by rerouting or potentially putting the Lines underground. I know now you will say more expensive, but in the end who will suffer and who will pay the money - people.	The BLM has worked for several years trying to find routes that meet everyone's needs and concerns, with varying levels of success. The BLM will continue to work with local interests to search for a consensus in areas of controversy. Placing lines underground not only costs much more, it requires much greater levels of disturbance than an above ground line. See Section 2.6 of the FEIS.
100985	REGINA ZIEGLGAENSBERGER		I heard that the power lines are being put on top of test hill. I am strongly opposing this. The hanggliding and paragliding community will lose an important site, there are only a few sites and they are disappearing as projects like these will succeed. I ask you to please preserve this flying site. We had a similar battle going on in San Diego, CA with high voltage power lines going through one of our flying sites and of course lost it. We got lucky that it didn't go directly on top of the hill, however pilots have to fly over these dangerous lines and one of these days it will come to the unfortunate and will cost a human life - is that really worth it?	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang gliding site.
100986	MICHAEL KINNEY		I really hope that the common sense appreciation for nature, the outdoors, and outdoor sports overcomes the proposed (probably cheapest) solution of placing the large power lines over the top of Test hill. Please consider what "progress" is, and what you would like our landscape to be like in the future.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang gliding site.
100987	REBECCA BREDEHOFT	JACKSON HOLE FREE FLIGHT CLUB	This is an important hill to the Hang gliding and Paragliding communities of the Western US. I would someday like to fly this site and would be unable to safely do so if these power lines were to be constructed. Please understand the intrinsic value of this hill to our sport and put the power lines somewhere else. Thank you	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang gliding site.
100989	DAN BRUCE		I would like to request that the proposed transmission lines impacting the test hill area be relocated so as not to effect those of us who would like to use this site for paragliding	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang gliding site.
100990	JENNIFER DORNING		Please do whatever you can to move the proposed power lines from Test Hill (Gillette property). There are fewer and fewer places in the United States for pilots to safely hangglide and paraglide. Please don't let us knowingly lose this one. The powerlines would stop it forever here, and make it extremely dangerous if people chose to continue flying with the powerlines installed.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang gliding site.

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100991	JUSTIN BRIM		I am writing to urge the BLM to find another location for power lines other than at "test hill" in Declo, ID. This place is a perfect location for paragliding and hang gliding training and has a long history of flight. The installation of power lines would make this location unsafe for flying and would be a huge loss to the flying community both in Idaho as well as nation wide.	Your opposition to the route near Test Hill is noted. It may be possible to develop an alignment between the Proposed Route and Alternative 7E during the design stage of the project that ties into the southern part of Alternative 7F. Such an alignment would avoid impacts to the subdivision as well as the hang gliding site.
100992	LEAH D OSBORN		BLM Preferred Alternative for Segment 9 will have a negative visual impact.	This is correct; all routes adversely affect scenery in some areas. Refer to Section 3.2 of the EIS.
100992	LEAH D OSBORN		I am writing in support of Segment 9D of the Gateway West Transmission Line in Owyhee County Idaho	Your support for Alternative 9d is noted.
100992	LEAH D OSBORN		I do not support the BLM's Preferred Alternative 9E.	Your opposition to Alternative 9E is noted.
100992	LEAH D OSBORN		•The BLM Preferred Alternative for Segment 9 will have a negative impact on the quality of recreational experiences.	Your concern for effects to recreation along Segment 9 is noted; see Section 2.17 for effects of the various Segment 9 routes considered.
100992	LEAH D OSBORN		Segment 9 of the BLM Preferred Alternative will have a negative impact on non-consumptive recreationist. Horseback riders, walkers, mountain bikers, motorized vehicle users and sightseers. The BLM Preferred Alternative will have a negative impact on the quality of the experience.	Your concern for effects to recreation along Segment 9 is noted; see Section 3.17 for effects of the various Segment 9 routes considered.
100992	LEAH D OSBORN		This area of Owyhee County is serene and beautiful. ???This view is within the impact area of the BLM Preferred Alternative Segment 9 E. ??Castle creek, Owyhee County. [See PDF for figure] This view will have the BLM Preferred Alternative of Segment 9 E 500 KV transmission line running across it. Castle Creek, Owyhee County [See PDF for figure] This quiet canyon may have a 500 KV power line running overhead. This canyon is very close to the middle of the impact area of the BLM Preferred Alternative of Segment 9 E . This is a beautiful spot to stop for lunch while out riding.	Effects to scenery from Alternative 9E are discussed in Section 3.2, as are the effects due to the alternatives to 9E.
100992	LEAH D OSBORN		Browns Creek, Owyhee County. [See PDF for figure] This is a popular area for many outdoor recreationists. Many trails cross this area. The Segment 9 of the BLM Preferred Alternative will cross this area of peach colored pumice. It is quiet here. There is no buzzing of a 500 KV transmission line. The BLM Preferred Alternative of Segment 9 E will have a negative audible impact on recreationists seeking that quiet day away from the hustle and bustle. Browns Creek area, Owyhee County [See PDF for figure] The BLM Preferred Alternative of Segment 9 E might go over this recreationist and her dog. 500 KV transmission lines will have a negative impact on even outings for pets. Browns Creek area, Owyhee County. [See PDF for figure] Sinker Canyon, Owyhee County. This canyon is very popular with every sort of recreationist. It is heavily used. The BLM Preferred Alternative for Segment 9 E will cross Sinker Canyon. This popular canyon will be negatively impacted [See PDF for figure] This unique rock formation and seasonal creek draw many motorized and non-motorized recreationists. The BLM's Preferred Alternative to Segment 9 E will very negatively impact the solitude and awe inspiring harsh beauty of this area. Birch Creek,	Your concern for effects to scenery along Segment 9 is noted; see Section 3.2 for effects of the various Segment 9 routes considered. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.

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			Owyhee County. All photos are within the 2 mile Corridor of the BLM's Alternative Route 9E. I do not support BLM Preferred Alternative 9E. I support Alternative 9D.	
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	The agreement between BLM and Owyhee County (documented in Enclosures 1 and 2) for the 9D route segment was mutually agreed upon and was consistent with all laws and regulations. Any deviation from the 9D route agreed to in Enclosures 1 and 2 will be vigorously fought and contested by the citizens of Owyhee County and by the Board of Owyhee County Commissioners. BLM shall be held to the law.	The local BLM staff worked closely with the County to develop a route that met all concerns. However, senior BLM staff reviewed the EIS and concluded that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. There is nothing illegal about this. The BLM will continue to work with local interests to search for a consensus route.
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	Owyhee County does support delaying a final decision on segments 8 and 9 for a period of a minimum of 180 days for the following purposes. To work cooperatively with state, county, and city governments on routes through the NCA. To complete the required NEPA analysis which properly analyzes the beneficial impacts of transmission lines in the NCA and which properly analyzes adverse impacts of the proposed routing.	Your support for a delayed decision is noted. The BLM has decided to follow the phased decision approach, it will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project.
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	BLM's arbitrary action to prevent the line from transiting the NCA is a prime example of an agency crafting regulations that are outside the law they are intended to implement. In this case, the agency (and by the BLM's action, the Secretary of Interior) willfully ignored the law as evidenced by the failure to include the transmission line and the West Wide Energy Corridor in the NCA RMP which was under development after the passage of the Energy Act. If the FEIS is not amended to place the line in the NCA, that will indicate the Agency's, and the Secretary of Interior's, continued willful violation of federal law.	Senior BLM staff review of the project was not arbitrary; it is their responsibility to review major project decisions. Their review found that the mitigation offered as of the completion of the FEIS was not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM must comply with the laws and regulations in effect. Nothing in the process violates the 2005 Energy Policy Act.
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	6. Owyhee County has commenced an effort to designate specific zones for power transmission lines. This effort is being conducted by the Owyhee County Planning and Zoning Commission. Public Notices have been published for the initial hearings. This action is pertinent as follows: The Consistency Review process provides for an additional check on consistency not only with Documented State or local plans, but also with "policies" or "programs" and can give a Governor an opportunity to influence the final RMP even after most other forms of public involvement are no longer available. The Council on Environmental Quality has interpreted the term "policies" (In its "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," which has been found to be persuasive authority for interpretation of NEPA by the U.S. Court of Appeals for the Tenth Circuit. Davis v. Mineta , 302 F.3d 1104, 1125 (10th Cir. 2002) to include: formally adopted statements of land use policy as embodied in laws or regulations;	The BLM recognizes that the County is in the process of designating transmission corridors and that the County has the authority to permit transmission lines on private lands in the county. However, the BLM is responsible under federal law for issuing ROW grants on federal land that it manages. The BLM will continue to search for a consensus route but any route across the NCA must be consistent with the enabling legislation for the NCA.

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			proposals for action, such as the initiation of a planning process; and formally adopted policy statements of a local, regional or State executive branch, even if they have not yet been formally adopted by the local, regional or State legislative body.”	
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	This is a project that is beneficial to the general good and belongs on the federal lands as determined by the Congressional passage and Presidential signature of The Energy Act of 2005. As noted in sections provided from the NRC Plan, the federal agencies manage the federal lands for the Congress. While the agencies may write regulations intended to implement the laws passed by the Congress, it must remain within the dictates of the law.	The BLM is following the laws passed by Congress including NEPA, FLPMA, the 2005 Energy Policy Act, and enabling legislation for the NCA.
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	Numerous studies show that the placement of a transmission line within the NCA will be beneficial to the enhancement of raptor populations. Furthermore, the area proposed already contains existing power transmission lines and a road which was recently significantly improved under the ARRA Stimulus Act. Photographs found in enclosure 3 provide documenting examples.	The issue involves the effects to prey species due to habitat fragmentation caused by construction disturbance and new roads associated with the routes in the NCA, the issue in not that towers would harm the raptors. To date, the Proponents have not offered adequate mitigation for these impacts. The BLM will continue to work with the Proponents and local interests on this issue.
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	GENERAL AND BACKGROUND INFORMATION: On February 17, 2012 Boise District Manager Aden Seidlitz provided a letter to this Board (Enclosure 1) which indicated BLM had proposed a few changes to the route previously submitted by the board and which requested: “... a confirmation of your acceptance to our recommendation for a route that we believe is viable and would result in achieving the majority of goals identified by both parties.” That letter was the end product of considerable involvement between the County and BLM in an attempt to find a viable route through our county that met the needs of the the BLM and Idaho Power while minimizing adverse impacts to Owyhee County and its citizens. On February 27, 2012, the Board signed and delivered the confirming letter to Mr. Seidlitz (See Enclosure 2). The agreement reached on that date was the result of extensive involvement by the County and BLM through the coordination process required under the Federal Land Policy and Management Act of 1976 (FLPMA). Owyhee County has been engaged in such coordination with BLM for nearly twenty years and has operated under the provisions of a signed “Protocol for Coordination Between BLM and Owyhee County” since July of 2002. In numerous meetings over the span of multiple years, we have pointed out to BLM the adverse impacts which would occur if the initial proposed location (along highway 78 and crossing large areas of private property) was not altered. We worked in good faith, under the provisions of our Protocol, to reach an agreeable solution which would achieve the needs of the transmission line without causing such significant impact to our county and to our citizens. The solution we agreed to in February 2012 is workable, consistent with County Plans and consistent with Section 368 of the Energy Act of 2005 which was signed into law by President George W. Bush.	The local BLM staff worked closely with the County to develop a route that met all concerns. However, senior BLM staff reviewed the EIS and concluded that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. This process was consistent with all laws, including the Energy Policy Act of 2005. The BLM will continue to work with local interests to search for a consensus route.

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100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	<p>SPECIFIC INCONSISTENCIES WITH FEDERAL LAW AND COUNTY PLANS: 1. Section 368 of the Energy Act of 2005: The Act required the establishment within two years of energy corridors in the eleven western states. Specifically, the law required the following:</p> <p>(a) Western States- Not later than 2 years after the date of enactment of this Act, the Secretary of Agriculture, the Secretary of Commerce, the Secretary of Defense, the Secretary of Energy, and the Secretary of the Interior (in this section referred to collectively as 'the Secretaries'), in consultation with the Federal Energy Regulatory Commission, States, tribal or local units of governments as appropriate, affected utility industries, and other interested persons, shall consult with each other and shall--</p> <p>(1) designate, under their respective authorities, corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land in the eleven contiguous Western States (as defined in section 103(o) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1702(o));</p> <p>(2) perform any environmental reviews that may be required to complete the designation of such corridors; and</p> <p>(3) incorporate the designated corridors into the relevant agency land use and resource management plans or equivalent plans.</p> <p>You will note that the act does not exempt federal lands in the National Landscape Conservation System (NLCS) from the requirements to incorporate the corridors in various land use plans.</p> <p>At the time the locations of the corridors were been considered, the Boise District Office was developing Resource Management Plans for the Bruneau Field Office and the Birds of Prey NCA.</p> <p>Owyhee County had agreed to be a Cooperating Agency on those two planning efforts and had staff members participating as members of the BLM's Interdisciplinary Team who were creating the plans. Prior to its completion, the Bruneau RMP was suspended. In the drafts which came out of the NCA planning effort, the West Wide Energy Corridors were included in an alternative which was noted as the preferred alternative. However, when NCA Manager John Sullivan appeared before the Owyhee County Commission to present the final draft and preferred alternative, the Corridors and associated transmission line plans had been removed from the NCA and the Corridors pushed out of the NCA.</p> <p>We were told by Mr. Sullivan that the decision had been made on the basis that while the transmission lines were compatible with raptor preservation, the pipelines which could be associated with the corridor projects was ground disturbing and, therefore not compatible. We were not aware of the specific language of Section 368 at the time of that presentation and ultimate signing of the Record of Decision on the</p>	<p>Your comments on the WWE Corridor process are noted. The County's issues with how the WWE corridors were created are beyond the scope of this analysis. The Proponents' Proposed Route follows the WWE corridor along Highway 77. We understand that the County objects to the corridor that follows Highway 78; therefore, the BLM selected one of the two alternatives identified by the county task force (9E), revised to avoid PPH and a planned subdivision. Please note that approximately 95 percent of Alternative 9E is on federal land. Both Alternatives 9E and 9D cross 3.3 miles of private land. The issue appears to not be the amount of private land crossed but where that land is located.</p>

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			<p>NCA Plan. Had we been aware, we would have protested the proposed decision on that basis.</p> <p>We only became aware of the provisions of Section 368 in the course of research related to the specific route locations for the Gateway West Project and have made numerous references to the inconsistency in letters to you as Project Lead and to Acting BLM Director Mike Pool. We have yet to received any BLM response as to how the Agency can simply ignore the requirements to place these projects on federal lands and, if necessary amend federal plans in order to do so.</p> <p>Therefore, our first noted inconsistency is with Section 368 of the Energy Act of 2005.</p>	
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	<p>2. The Owyhee County Natural Resources Plan (NRC Plan): Because Owyhee County is predominantly comprised of federal (76%) and state (7%) owned lands, we recognized early that the effects of federal and state management had significant impacts on the 17% of land in the county which is in private ownership. We have had a version of the NRC Plan in existence and known to Federal Land managers since 1994. The latest version was revised and adopted in 2009 and has been provided to Federal Land Managers. From the earliest version to the present, the plans call for preservation of private property, preservation of agricultural lands and the custom, culture and economy of the county. Because of our awareness of the impact of the federal and state land management on the private property we have watched carefully and engaged often in various plans and actions by the federal and state land management agencies. The specific areas of inconsistency with the NRC Plan are: From the NRC Plan Chapter I Page 2: The custom and culture of Owyhee County has never altered from its historic beginnings. Mining, ranching, and farming activities provide the heritage of the County's residents, and they continue those activities today. Page 3: Private property rights and interests are important to the residents of Owyhee County. Private ownership and the incentives provided by that ownership is a driving force behind the innovativeness which has allowed the continuation of the custom, culture and lifestyle of the County. As a result of the importance of property rights to its citizens, Owyhee County's government was one of the first in the state act under the Local Planning Act of 1975. Owyhee County's people had commenced their planning process designed to continue the lifestyle, which assures quiet enjoyment of property rights and interests and the highest possible degree of protection of those rights. The history of Owyhee County land use planning began with formation of the Owyhee County Planning Commission in 1945, the first organized Planning Commission in the state. That history is set forth at length in the Interim Comprehensive Land Use and Management Plan issued by the Board of Commissioners in July, 1993. Page 4: During most of the fifty years of the planning activities in Owyhee County, attention was</p>	<p>The BLM acknowledges that the county plan calls for preservation of private property and of agricultural lands. It also acknowledges the importance of coordinating with local governments in the planning process. The BLM worked with the County to develop routes that avoid private land. The Owyhee County Task Force submitted two routes, these became Alternatives 9D and 9E. Alternative 9D crosses through the NCA while Alternative 9E crosses near the edge of the NCA, mostly in or adjacent to a designated utility corridor. The BLM modified Alternative 9E to further reduce impacts to private land. Approximately 95 percent of Alternative 9E is on federal land. Both Alternatives 9E and 9D cross 3.3 miles of private land. Both alternatives are equally effective at avoiding private property. Alternative 9E crosses slightly less agricultural land than Alternative 9D. The BLM agrees that NEPA requires federal agencies to consider the impact of their actions on the people on Owyhee County and their way of life. The FEIS meets this requirement. Refer to Sections 3.4 and 3.5. Refer to Section 3.18 (as well as Section 3.4) for the effects on agriculture.</p> <p>The BLM has gone to great lengths to coordinate with local government on this project. The comment states that BLM's land use plan must be "consistent with State and local plans" to the maximum extent possible under federal law. In this case the BLM cannot select the County's preferred route because, based on the offered mitigation, this route would not meet federal law (i.e., the enabling legislation for the NCA). However, there is a possibility that a solution may be found. Therefore, the BLM has decided to follow the phased decision approach, it will continue working with the Proponents and other stakeholders to seek a consensus resolution to siting issues in the NCA.</p>

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			<p>placed on development of private lands. But, as federal policies began to change toward a direction of reducing livestock grazing, reducing recreation use, seizing ownership of private property, water rights and rights-of-way, it became clear that Owyhee County would have to extend its planning efforts to an area of concern for the federal lands. The Board of Commissioners appointed the Land Use Planning Committee in 1992 and the Committee assisted the Board in developing the Interim Plan which was issued in July, 1993. After the creation of the Owyhee County Planning and Zoning Commission the Land Use Planning Committee was renamed the Owyhee County Natural Resources Committee to avoid confusion on the roles of the two entities. The economy of the County has always been, and is today, still largely dependent upon ranching and agricultural operations. Page 5: Privately owned land is intermingled with the federal and state lands. Management decisions for the federal and state lands directly impact use of, and the economic value of, private land. Page 6: The limited amount of private property greatly restricts the tax revenue of the County. In such a slightly populated County as Owyhee, all sources of economic support must be maintained at their highest possible level. In order to sustain the economic stability of the County, the Board of Commissioners and the Natural Resources Committee have dedicated themselves to a coordinated land use planning effort which can hold the federal management agencies to standards set by Congress regarding continuation of multiple use of the federal lands. Page 7: It is therefore the policy of Owyhee County that the Natural Resources Committee and the Board work constantly to assure that federal and state agencies shall inform the Board of all pending or proposed actions affecting land use, local communities and County citizens and coordinate with the Board in the planning and implementation of those actions. (See Appendix I, Federal Land Policy and Management Act)</p> <p>Such coordination of planning is mandated by federal laws. The Federal Land Policy and Management Act, 43 U.S. § 1701, declared the National Policy to be that "the national interest will be best realized if the public lands and their resources are periodically and systematically inventoried and their present and future use is projected through a land use planning process coordinated with other federal and state planning efforts." (See 43 USC § 1701 (a) (2)).</p> <p>43 U.S.C. § 1712 (c) sets forth the "criteria for development and revision of land use plans." Section 1712 (c) (9) refers to the coordinate status of a county which is engaging in land use planning, and requires that the "Secretary [of Interior] shall" "coordinate the land use inventory, planning, and management activities... with the land use planning and management programs of other federal departments and agencies and of the State and local governments within which the lands are located." This provision gives preference to those counties which</p>	

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			<p>are engaging in a land use planning program over the general public, special interest groups of citizens, and even counties not engaging in a land use planning program. Section 1712 also provides that the "Secretary shall" "assist in resolving, to the extent practical, inconsistencies between federal and nonfederal government plans."</p> <p>This provision also gives preference to those counties which are engaging in the planning process over the general public, special interest groups of citizens, and even counties not engaging in a land use planning program. Page 8: In view of the requirement that the Secretary [of Interior] "coordinate" land use inventory, planning and management activities with local governments, it is reasonable to read the requirement of assisting in resolving inconsistencies to mean that the resolution process takes place during the planning cycle instead of at the end of the planning cycle when a draft federal plan is released for public review. The section further requires that the "Secretary [of Interior] shall" "provide for meaningful public involvement of state and local government officials... in the development of land use programs, land use regulations, and land use decisions for public lands." When read in light of the "coordinate" requirement of the section, it is reasonable to read "meaningful involvement" as referring to ongoing consultations and involvement throughout the planning cycle not merely at the end of the planning cycle. This latter provision of the statute also distinguishes local government officials from members of the general public or special interest groups of citizens. Section 1712 (c) (9) further provides that the Secretary of Interior must assure that the BLM's land use plan be "consistent with State and local plans" to the maximum extent possible under federal law and the purposes of the Federal Land Policy and Management Act. It is reasonable to read this statutory provision in association with the requirement of coordinated involvement in the planning process. The coordination requirements of Section 1712 (c) (9) set apart for public involvement those government officials who are engaged in the land use planning process as is Owyhee County. The statutory language distinguishing the County because it is engaged in the land use planning process makes sense because of the Board's obligation to plan for future land uses which will serve the welfare of all the people of the County and promote continued operation of the government in the best interests of the people of Owyhee County. Page 9: The National Environmental Policy Act requires that all federal agencies consider the impacts of their actions on the environment and on the preservation of the culture, heritage and custom of local government. In 16 U.S.C. § 4331 (a) (4) the law provides as follows: "It is the continuing responsibility of the federal government to use all practicable means, consistent with other essential considerations of national policy, to: (4) Preserve important historic, culture, and natural aspects of our national heritage." The term</p>	

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			<p>"culture" is defined as "customary beliefs, social forms, and material traits of a group; the integrated pattern of human behavior passed to succeeding generations." See Webster's New Collegiate Dictionary at 277 (1975). Thus, by definition, the National Environmental Policy Act requires federal agencies to consider the impact of their actions on the custom of the people as shown by their beliefs, social forms, and "material traits."</p> <p>It is reasonable to read this provision of the National Environmental Protection Act as requiring that federal agencies consider the impact of their actions on rural, range-oriented, agricultural counties such as Owyhee County where, for generations, families have depended upon the "material traits" of ranching, farming, mining, timber production, wood products, and other agricultural lines of work for their economic livelihoods. Page 10: The Natural Resources Committee and the Board now call upon the federal and state management agencies to coordinate in advance with the Board any proposed actions which will impact either the federally and state managed lands in Owyhee County, the private property rights and private property interests including investment backed expectations of citizens of the County, the economic stability and historically developed custom and culture of the County, or provisions of this Land Use Plan. Such management agencies are requested to so coordinate their actions by providing to the Board in a timely manner, prior to taking official action, a report on the proposed action, the purposes, objectives and estimated environmental, social, cultural and economic impacts of such action. In other words, the Natural Resources Committee and the Board request no more from the federal management agencies than what is required by the federal laws governing their management processes as well as Executive Order 12630 issued by former President Reagan on March 15, 1988 and implemented by guidelines prepared for all federal agencies by the Attorney General of the United States.</p> <p>The Natural Resources Committee and the Board request no more from the state management agencies than what was clearly intended by the Idaho Legislature through enactment of the Local Planning Act of 1975. In exchange for compliance with federal law by the federal management agencies, the Natural Resources Committee and the Board commit to a positive planning process through which the County will maintain its commitment to true multiple use of the federally managed lands. In exchange for participation by the state management agencies, the Natural Resources Committee and the Board commit to a positive planning process through which the County will equitably consider the best interest of all the people of the state of Idaho in the use of the state managed lands. The County commits to an effort to develop and maintain Memoranda of Understanding with these agencies through which coordinated planning can be better implemented. Chapter II</p>	

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			<p>Page 1: The federal lands which form the bulk of the land mass in Owyhee County are under management direction from the Congress of the United States. Article IV, Section 3(2) of the United States Constitution provides that “The Congress shall have power to dispose of and make all needful rules and regulations respecting the territory or other property belonging to the United States...” Page 1 and 2: The Congress has passed many statutes in exercise of this Constitutional power and authority. Most of those statutes authorize the Secretary who heads an executive management agency to issue rules and regulations to implement the statutes. But the management power and authority never leaves the Congress. The management agencies simply manage the land for the Congress. Their regulations must be consistent with the statutes and must not exceed the authority granted by the statutes. Page 2: Through coordinated planning, the federal lands can be managed so as to sustain productivity for this and future generations, to maintain the quality of the resources, to protect and preserve private property rights and interests, to maintain full multiple use, and to preserve and maintain the custom, culture and economic stability of the County. Page 4: The Natural Resources Committee and the Board will carefully evaluate all federal or state actions relating to private property and private property interests including investment backed expectations in light of the mandate of the Fifth Amendment to the United States Constitution. In so evaluating federal and state actions the Natural Resources Committee and the Board will apply also the principle established by former President Ronald Reagan in issuing Executive Order 12630 which required any and all federal agencies to prepare a Takings Implication Assessment prior to taking any action, issuing any rule, or making any decision which would constitute a taking of private property or private property interest including investment backed expectation. Appendix H Owyhee County Wildland Urban Interface Fire Plan The plan contains numerous references to the low to moderate danger of fire starts from power transmission lines throughout the county. Page 7 of the Fire Plan Appendices contains a High Fire Prone area map which shows the area proposed for the preferred alternative to be in a high risk area. From the Index of Appendices: Appendix A-1: Regional Economic Impact Model of Owyhee County, Idaho and the Four County Area Including Ada, Canyon, Elmore, and Owyhee Counties. Tim D. Darden, Neil R. Rimbey, and J.D. Wulforth: Agricultural Economics Extension Series No. 03-06, June 2003 Appendix A-2: Social and Community Impacts of Public Land Grazing Policy Alternatives in the Bruneau Resource Area of Owyhee County, Idaho: J.D. WULFHORST, NEIL R. RIMBEY, AND TIM D. DARDEN, Agricultural Economics Extension Series No. 03-07, September 2003 Appendix A-3: Ranch Level Economic Impacts of Public Land Grazing Policy Alternatives in</p>	

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			the Bruneau Resource Area of Owyhee County, Idaho. Neil R. Rimbey, Tim D. Darden L. Allen Torell, John A. Tanaka, Larry W. Van Tassell and J.D. Wulforth: Agricultural Economics Extension Series No. 03-05 June 2003. As you will note from the cited sections of the NRC plan, Owyhee county's intent, which is consistent across multiple county plans, is the preservation of the limited private property in the county and the continuation of the economic activity which occurs on those lands that would be harmed by the placement of the line as proposed. The placement of the line as agreed between Boise District BLM and the County in February of 2012 would avoid inconsistency with the elements of the NRC Plan.	
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	The NRC Plan points out that it is the Congress, through legislation signed into law by the President, that establishes how the federal lands will be managed. While the Secretary is granted the authority to create regulations for the implementation of the law, the Secretary does not have the authority to create new law in those regulations or to ignore elements of law in carrying out the management of the federal lands. The FEIS blatantly ignores Section 368 of the Energy Act of 2005, which constitutes action by the Secretary which is not lawful or permitted.	The FEIS is not violating this law as the comment states. The Energy Policy Act of 2005 does not require that transmission lines be placed only on federal land; it requires that the WWE corridor only be designated on federal lands. Nowhere in section 368 (which is quoted in full here) does it state that transmission lines must only be on federal land. Section 368. ENERGY RIGHT-OF-WAY CORRIDORS ON FEDERAL LAND. (a) Western States- Not later than 2 years after the date of enactment of this Act, the Secretary of Agriculture, the Secretary of Commerce, the Secretary of Defense, the Secretary of Energy, and the Secretary of the Interior (in this section referred to collectively as 'the Secretaries'), in consultation with the Federal Energy Regulatory Commission, States, tribal or local units of governments as appropriate, affected utility industries, and other interested persons, shall consult with each other and shall-- (1) designate, under their respective authorities, corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land in the eleven contiguous Western States (as defined in section 103(o) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1702(o)); (2) perform any environmental reviews that may be required to complete the designation of such corridors; and (3) incorporate the designated corridors into the relevant agency land use and resource management plans or equivalent plans. (b) Other States- Not later than 4 years after the date of enactment of this Act, the Secretaries, in consultation with the Federal Energy Regulatory Commission, affected utility industries, and other interested persons, shall jointly-- (1) identify corridors for oil, gas, and hydrogen pipelines and electricity transmission and (2) schedule prompt action to identify, designate, and incorporate the corridors into the applicable land use plans. (c) Ongoing Responsibilities- The Secretaries, in consultation with the Federal Energy Regulatory Commission, affected utility industries, and other interested parties, shall establish procedures

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				under their respective authorities that-- (1) ensure that additional corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on Federal land are promptly identified and designated as necessary; and (2) expedite applications to construct or modify oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities within such corridors, taking into account prior analyses and environmental reviews undertaken during the designation of such corridors. (d) Considerations- In carrying out this section, the Secretaries shall take into account the need for upgraded and new electricity transmission and distribution facilities to-- (1) improve reliability; (2) relieve congestion; and (3) enhance the capability of the national grid to deliver electricity. (e) Specifications of Corridor- A corridor designated under this section shall, at a minimum, specify the centerline, width, and compatible uses of the corridor.
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	3. The "Sage Grouse Management Plan for Owyhee County, Idaho" (SG Plan) which was initially adopted in June 2002, amended and updated in 2004 and 2013. The following inconsistencies exist between the BLM's proposed preferred alternative and the SG Plan: p.13 SAGE-GROUSE THREATS AND EXISTING CONDITIONS THAT AFFECT OR MAY AFFECT SAGE-GROUSE AND THEIR HABITAT IN OWYHEE COUNTY: The placement of energy development and associated infrastructure in and around sage-grouse habitat also may affect sage-grouse populations. p.15 HABITAT FRAGMENTATION AND PERENNIAL GRASSLANDS Habitat fragmentation can result from reduced sagebrush cover due to wildfire and from subdivision and development in rural areas. p. 16 INFRASTRUCTURE/ENERGY DEVELOPMENT Energy development is rapidly encroaching in the western United States and has emerged as a major issue in conservation of Greater Sage-Grouse and their habitats (Naugle et al. 2011). Sage-grouse populations in Wyoming, Montana, and Alberta have declined following the development of natural gas wells and associated roads and power lines. Currently, natural gas development is not a concern in Owyhee County. However, two major 500-kV transmission lines are proposed to run through a large swath of intact sage-grouse habitat from Wyoming through southern Idaho to Hemmingway Butte (Gateway West) and from Hemmingway Butte to Oregon (Boardman/Hemmingway). The BLM's preferred alternative route for one of the transmission lines, runs through prime sage-grouse habitat south of State Highway 78 in Owyhee County. Twenty-two wind-energy proposals have arisen during recent years throughout Owyhee County (Idaho Division of Building Safety 2011). Sage-grouse avoid infrastructure developments in Wyoming (Doherty et al. 2008), and both Lesser (Tympanuchus pallidicinctus) and Greater Prairie Chickens (T. cupido) avoided power lines and highways by at least 100 m in	Alternative 9E generally avoids preliminary priority habitat (PPH) for sage-grouse but does cross general habitat. The FIES considers the effects that transmission lines have on ravens and how that affects sage-grouse and other prey species in Sections 3.10 and 3.11.

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			<p>Kansas and Oklahoma (Pruett et al. 2009). Blickley et al. (2012) found that increased noise associated with vehicular traffic near oil and natural gas fields had a detrimental effect on breeding sage-grouse. In a broad-scale study assessing influences of environmental and anthropogenic features on Greater Sage-Grouse, Johnson et al. (2011) found that lek trends increased with distance to nearest communication tower and analogously decreased as the number of towers increased. New transmission line and wind energy development should be placed outside core sage-grouse areas where possible. Sage-grouse require large, intact sagebrush habitats to maintain populations. The addition of power lines and wind towers and their associated infrastructure development will be detrimental to sage-grouse populations in Owyhee County. Transmission line towers provide both new and alternative nesting substrate for raptors and ravens (Steenhof et al. 1993). Raven numbers on transmission lines will increase over time, as offspring of productive pairs colonize transmission towers (see Table 1 and Figure 3 in Steenhof et al. 1993). Increases will be associated not only with an increase in potential perch sites but also an increase in nesting and roosting opportunities. Radio telemetry studies in southwestern Idaho (Engel and Young 1992) revealed that ravens moved an average of 7 km (about 4.5 miles) and as far as 65 km (about 40 miles) from transmission line roosts in each day. Given that ravens forage several miles from their nests and roosts, sage-grouse nests within 15 miles of new transmission lines will be vulnerable to ravens that roost on transmission lines. p.19</p> <p>MITIGATION New infrastructure, construction, urban development, and agricultural expansion should be sited to avoid important sage-grouse habitat whenever possible. These types of projects should include best management practices to minimize sage-grouse impacts and restore affected areas, such as timing construction to minimize disturbance and re-vegetating of disturbed lands. Measures to mitigate impacts at off-site locations also should be employed to offset unavoidable alteration and losses of sage-grouse habitat caused by these projects. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities. p. 24 K. Habitat Fragmentation – The LWG, in cooperation with Federal, State, and Private partners, will attempt to minimize and/or mitigate habitat fragmentation associated with infrastructure developments (roads, fences, etc.). p.27 H. Investigate the impacts of energy and infrastructure development on sage-grouse in Owyhee County. . Accomplishments i. BLM and IDFG have increased efforts to identify all active leks within the proposed transmission line corridor. Routing the line through the NCA, as agreed to between Boise District BLM and Owyhee County in February 2012 will avoid all the above inconsistencies and will be consistent with the Energy Act of 2005.</p>	

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100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	4. The Owyhee County Energy Plan: The BLM Proposed Preferred Route is inconsistent with the following elements of the County Energy Plan: Preservation of existing natural resources Preservation of prime agricultural cropland, The County will establish an Energy and Environment Department. The purpose of the department is to develop methods to encourage and monitor development of environmentally sound alternative energy developments. The department will develop, coordinate, and recommend ordinances or legislative changes to further this energy plan and environmental issues affecting the county and its residents.	Noted.
100993	KELLY ABERASTURI, JERRY HOAGLAND, JOE MERRICK	OWYHEE COUNTY, BOARD OF COMMISSIONERS	5. The Owyhee County Comprehensive Plan: The BLM Proposed Preferred Route is inconsistent with the following elements of the Owyhee County Comprehensive Plan (Some elements have been emphasized by Bold and Underline): It is the intent of the people of Owyhee County to preserve and protect the historic customs, traditions, and way of life unique to Owyhee County in so far as this is consistent with a reasonable and orderly rate of growth and development and with the protection of private property rights. It is also the intent of the people of Owyhee County to use this plan as a guide and framework which will provide for reasonable and sound land development, a safe and healthy living environment, and a successful economic climate while at the same time conserving the best of the historic ranching and farming tradition and way of life. Decisions of the Planning and Zoning Commission and the Board of County Commissioners regarding land use must be consistent with this Plan and the ordinances which are enacted to implement the Plan. Within the time frames established by state law, on a regular basis the Planning and Zoning Commission and the Board of County Commissioners will review the plan and update it as necessary to meet the changing needs of the County. This Comprehensive Plan which is directly applicable to planning for the private lands in the County has been developed for consistency with the Natural Resource Plan for the federally and State Managed Lands. The nature of the checkerboard location of private lands, state lands and federal lands makes it imperative that the Planning and Zoning Commission always keep in mind the impact management actions on the federal lands and state lands will have on private land, and that the Commission insist on compliance with this Plan by federal and state land management agencies where the law allows it to insist on such compliance. The Plans must be implemented in coordinated fashion, and should complement each other in planning for the future of Owyhee County. The Planning and Zoning Commission will coordinate its activities with the Owyhee County Natural Resources Committee to ensure proper planning for the entire County and the protection of private property rights which are critical to the custom, culture, and economic stability of Owyhee County. To protect, enhance and insure private property values and rights within the national, state, and local laws. To recognize the value of all land uses and protect the right to those uses, in recognition of health, safety and welfare	The County's opposition to the BLM's Preferred Route for Segment 9 is noted. The BLM will continue to work with local interests to search for a consensus route.

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			<p>standards and in compliance with the Comprehensive Plan. To recognize that surrounding property owners also have the right for protection of their property rights and values. To protect existing agricultural uses and rights, as allowed under State law. The federal and state governments control 82.7% of the land situated within Owyhee County. As the Comprehensive Plan is updated, new or modified zones may be created. As part of this process, consideration of existing commercial and industrial uses and platted residential subdivisions will be taken into account and zoned according to their use at the time of the adoption of the zoning map if such use is reasonable and appropriate to that area and does not constitute a substantial incompatibility to adjacent property. The purpose of the agricultural zone is to preserve and protect the decreasing supply of agricultural land, and to control the infiltration of urban development into agricultural areas which will adversely impact agricultural operations and will result in an adverse impact on the county's tax base and economy. To conserve and encourage the best of the County's historic ranching and farming tradition and way of life. To anticipate and provide for a variety of uses in Owyhee County to meet the needs of the citizens while recognizing the importance of maintaining and enhancing agricultural opportunities. To protect and maintain soil, water, air, wildlife and other natural environmental and scenic so that they may be utilized now and in the future. protect private property rights of all persons within the county. To respect the uses already existing within the county. To discourage, through the Zoning Ordinance, the mixing of incompatible uses that may be detrimental to surrounding properties or uses. To conserve and encourage the best of the County's historic ranching and farming tradition and way of life. To discourage development in areas of the County that are remote from County services and public facilities.</p> <p>Natural Resources Goals</p> <p>To protect and preserve the natural resources of the County by managing development and the use of those natural resources as necessary components of agricultural, commercial and recreational activities.</p> <p>Avoid unsuitable remote rural development by maintaining open space and access to natural resources through coordination of this Plan with the Owyhee County Land Use and Management Plan for Federal and State Land.</p> <p>Natural Resources Objectives:</p> <p>Promote and encourage good stewardship of the natural resources.</p> <p>Promote and encourage cooperation of various entities desiring to use the natural resources in different ways.</p> <p>Protect the historical and customary rights of use, development, and enhancement of natural resources. As much as possible, do not take existing natural resources use from one user for the use of another.</p> <p>Develop standards to minimize conflicts between development and irrigation systems.</p> <p>Any state, federal, or governmental actions shall follow the requirements of law and regulation regarding notification, coordination, and consistency with</p>	

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			<p>county policies and plans. Agencies shall contact and coordinate with the County in these areas.</p> <p>Carefully weigh the effect on natural resources from pollution or detrimental impacts before approving development or changes of historic use.</p> <p>Explore alternative uses for natural resources that “add value”</p> <p>Community design is established by the combined physical elements which contribute to the overall visual character of a place. The natural landscape, the form and arrangement of structures on the landscape, and the aesthetic continuity of neighboring parcels of land are the most common design considerations. Development will be encouraged to incorporate a reasonable measure of rural atmosphere, country life style and open space. The natural beauty of unincorporated Owyhee County is its existing landscape dominated by vast expanses of open rangeland, and undeveloped state and federal lands.</p> <p>Community Design Goals:</p> <p>Encourage development within appropriate zones. Encourage preservation of cultural resources. Encourage preservation of open rangeland. Encourage preservation of recreation lands. Encourage preservation of open spaces. Coordination of land management objectives with federal agencies.</p> <p>Encourage new development to incorporate a reasonable measure of rural atmosphere, county life style and open space.</p> <p>Encourage compatible new development.</p> <p>Community Design Objectives:</p> <p>Encourage public utilities and utility corridors to be located on public lands</p> <p>Utility and Energy Goals:</p> <p>Protect the property rights of Owyhee County citizens and not allow the infiltration of public utilities and energy corridors to negatively impact those citizens or their private property.</p> <p>The Plan, and the process of implementation of the Plan is to: Protect property rights and enhance property values; ensure adequate public facilities and services at a reasonable cost; protect and enhance the economy of the county; ensure protection of important environmental features, protect prime agricultural lands and mineral resources, encourage urban development within and near cities; ensure development consistent with the land’s physical character, protect fish, wildlife and recreational resources’ and to avoid water and air pollution.</p>	

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100994	JOSH PETERSON, DIANE PETERSON	PETERSON OUTFITTERS LLC	Peterson Outfitters owns 40 acres (SW1/4 SW1/4: SEC 26 T 21 R 84) South of the town of Walcott, Wy near the railroad. It appears on your map that the agency preferred route will come directly across our southern half of our property. The property includes a residence which houses outfitter clients and employees of Peterson Livestock year round. The agency preferred blue line on the map is running directly over our water line and water cistern. The property also includes a shooting range and hunting blind for our clients. My concern is the close proximity of the line to a year round used residence and business	The design was shifted south from the original alignment in order to avoid multiple crossings of the railroad tracks to the north. The alignment in Segment 2 was also constrained by pipeline corridors to the south, Saint Mary's Creek to the north, and sage-grouse core area and the Governor's corridor to the east. It may also be constrained by Transwest Express and Gateway South. Because the line is on private land, design siting and impact avoidance will need to be discussed with Rocky Mountain Power and or the Wyoming Infrastructure Authority.
100994	JOSH PETERSON, DIANE PETERSON	PETERSON OUTFITTERS LLC	am strongly opposed to the agency preferred route, as this would be extremely detrimental and a safety issue to our employees and business	Your opposition to the route is noted.
100995	JED WAYMENT		BLM's preferred route as outlined in 3.7 is based principally on speculation as evidenced by their own statements; "The Preferred Route Proposed Route and Route Alternatives would pass through multiple habitats that could support special status plant species." and "This section will then conclude by describing the methods used to determine the probable locations of and the potential impacts to these species", and "the TES plant species potentially present within this area".	All areas in and adjacent to the ROW would be surveyed for plants prior to any ground disturbance. See TESPL-3, "Qualified botanists shall conduct preconstruction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micro-siting of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to land management agency for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction." as well as other mitigation measures in Table 2.7-1.
100995	JED WAYMENT		The Proposed Alternative Route posed by the citizens of Cassia County takes into consideration the aforementioned effects to all elements (plant, animal, human) affected by the power line siting. As pertaining to Cassia County, the proposed Southern Alternative Route should be, undoubtedly, the route of choice	Your support for Alternative 7K is noted. Refer to Section 2.4.1.1 for the reasons 7K was not selected as part of the BLM's preferred alternative.
100995	JED WAYMENT		Effects on economic values of property and livelihoods of people negatively affected are much more definitive. Compensation for such losses is unquestionably inadequate and unfair as evidenced by escalating land values and very recent historical empirical data. An interesting, well-known fact is that Cassia County is approximately 63% public land, while 80% of the power line's siting is on private land.	Economic impacts, including impacts to agriculture, are disclosed in Section 3.4, Section 3.18, and Appendix K.
100995	JED WAYMENT		In addition, BLM's speculations as to effects on potentially endangered species are markedly different from the State of Idaho's conclusions on the same subjects. With regards to the BLM's proposed Preferred Route, the so-called science used to establish sufficient losses of "potential" TES species is at best limited and self-serving with little regard to overall impacts to land, plants, animals and, most importantly, people.	The route the County proposes is 30 miles longer than the BLM's Preferred Route, and would cost approximately \$60 million dollars more to build. In addition, and more importantly, it would adversely impact approximately 1,400 acres of preliminary priority habitat (PPH) for sage-grouse, approximately 10 times as much as the Preferred Route.
100996	OWEN RALPHS	AGRICOL WEST, INC	Besides that, what of the negative impact that it will have on individual farmers in the valley.	The EIS discloses that there would be adverse impacts to farmers; see Sections 3.4 and 3.18, as well as Appendix K.

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100996	OWEN RALPHS	AGRICOL WEST, INC	The proposed route that BLM has put forward is going right through the middle of our property, property that we just spent thousands of dollars to break out of CRP over the last two years, all to become a money maker for Idaho Power, while we lose that source of income generation.	The intent is to microsite the line to reduce impacts to irrigated fields; see Figure 3.18-2. Please note that the County to has the authority to approve the alignment on private land, not the BLM.
100996	OWEN RALPHS	AGRICOL WEST, INC	What of the negative impacts that stray voltage will have on people? Is there a study about that? I doubt it, because the BLM is more worried about Sage Grouse than it is about humans.	Refer to Section 3.21 for the effects of stray voltage and other health concerns.
100996	OWEN RALPHS	AGRICOL WEST, INC	What if I need to hire an airplane sprayer? I hope I can find a suicide bomber to come in and do it for me. No sane pilot is going to try and fly around these massive towers. What happens when the towers interfere with my GPS systems on my tractors? What of the impact that it will have on irrigation systems? BLM hasn't taken into consideration any of this. They're only worried about a few birds, not the impact that it will have on the agricultural industry in Rockland or Idaho in general.	Appendix K includes an analysis of how the transmission lines affect the use of aircraft to spray agricultural fields. Appendix K was prepared by an independent agricultural specialist at the request of Cassia and Power Counties.
100996	OWEN RALPHS	AGRICOL WEST, INC	What happens when the towers interfere with my GPS systems on my tractors?	Refer to Section 3.21 for an analysis of the effects of 500 kV lines on GPS systems.
100996	OWEN RALPHS	AGRICOL WEST, INC	Rockland has been in need of power line upgrades for several years, and Idaho Power is unwilling to do anything about it. Instead, they just let our power go off several times a month, causing electrical damage to sensitive electrical components. This line is not good for Idaho and it's not something that should be put on private land. If Idaho Power thinks that they need it, then BLM can figure out a route on BLM land that they can put their towers.	One objective of the Project is to better provide power to the Proponents' service areas. Refer to Section 2.4.1.1 for the reasons the Preferred Route was selected.
100996	OWEN RALPHS	AGRICOL WEST, INC	Quit hiding behind the lie of Sage Grouse.	Noted. Sage-grouse are a serious concern for both the state and federal governments.
100996	OWEN RALPHS	AGRICOL WEST, INC	The Gateway West transmission line will have a large negative impact on huge amounts of private land owners, who rely on their property to make a living as most of it is farm land.	Noted. Economic impacts on landowners are discussed in Section 3.4. Impacts to agriculture in Sections 3.4 and 3.18, as well as Appendix K.
100996	OWEN RALPHS	AGRICOL WEST, INC	The BLM has essentially ignored the tax payers in the route that it has chosen, using the excuse of Sage Grouse as the reason that 80% of the line is on private property instead of public.	The reason why the BLM chose the Preferred Routes in Segments 5 and 7 are disclosed in Section 2.4.1.1 of the FEIS. Sage-grouse are a serious concern for both the state and federal governments. The effect on property owners is discussed in Section 3.4 of the FEIS. Approximately half the Project is on public lands: 47 percent BLM, 7 percent State, 44 percent private, 1 percent National Forest System (NFS) land, and 1 percent Other. Within the Pocatello Field Office, the general land base includes 12 percent BLM, 21 percent NFS, 10 percent Indian Reservation, 6 percent State, 2 percent Water, and 48 percent private.
100996	OWEN RALPHS	AGRICOL WEST, INC	One of the BLM directors even had the nerve to tell me that it wasn't in the best interest of BLM to put the line on public property. I was unaware that what was in the best interest of the BLM was in direct conflict with what was in the best interest of the public. Afterall, they work for the public, do they not? Well, the public have stated that they DO NOT want this line coming through the Rockland valley. It is not a	The majority of the Preferred Alternative for the Gateway West transmission line is on public land; this is not the case for all segments. Approximately 79 percent of Segments 5 and 7 are on private land, while approximately 42 and 8 percent, respectively, of Segments 8 and 9 are on private land. See Table ES-1 and Tables 2.8-1 to 2.8-7 for additional details.

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			fact that the Sage Grouse will die out if these lines are put on public land. They will simply move to another spot. If the BLM is so worried about wildlife, what of the Sharptail Grouse? The Fish and Game has spent countless time in the Rockland valley over the last couple of years trying to reestablish the Sharptail Grouse population. You mean to tell me that this project wont impact them?	
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	In addition, we believe that the mitigation outlined in the Final EIS is insufficient or lacking for streamside reclamation impacts	Noted.
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	4. Lack of consistent application of seasonal stipulations. As we discussed in our comments in October 2011, TU believes the setbacks or buffer stipulations to streams and river crossings are basically inadequate, particularly for sensitive native fish. This is primarily because there is no consistency among field offices or across state BLM land jurisdictions with respect to stipulations. This must be remedied. The BLM is within its jurisdiction to create a consistent set of stipulations for impacts associated with energy development projects when there is an edge- effect among field office boundaries.2 TU believes this can be remedied by three actions: First, we support the 1,000 foot buffer application defined in the Kemmerer RMP and request that this stipulation be applied for all sensitive fish waters. Second, the 500-foot buffer recommended in the Rock Springs field office and the Wyoming statewide 500-foot buffer for staging, refueling, drilling activities and disturbances be implemented along the entire route where public lands are accessed. Third, no construction activities should be allowed during spawning activities in any watershed where this Project crosses.	Seasonal restrictions are based on the land management plan for each area. These restrictions reflect the fact that each area is different and require stipulations tailored to that area, rather than one blanket prescription for all areas across the 1,000 miles of the Project.
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	5. Segment 4 Fish and Wildlife Concerns. Our primary concerns center on that portion of the transmission line route identified as Segment 4 in western Wyoming. In our comments to the Draft EIS, we provided detailed analysis for the numerous alternatives identified in the Segment 4 route. Yet, after reviewing the Final EIS, we are left with the impression that our concerns have been disregarded. Rather than choose the least environmentally intrusive routes of Alternative 4 (identified in our comments as 4C and 4E), the BLM has chosen the route (4A)	The identification of a preferred route considers more than just fish and big game. Many other resources must be considered. Following the Wyoming Governor's sage-grouse corridor through core sage-grouse habitat was a major concern. Section 2.4.1.1 discusses the reasons for selecting the Preferred Route in Segment 4. Effects on historic trails, Fossil Butte National Monument, and the Rock Creek Ridge SMA were also important factors in selecting the Segment 4 route.
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	Rather than choose the least environmentally intrusive routes of Alternative 4 (identified in our comments as 4C and 4E), the BLM has chosen the route (4A) that: - has the most stream crossings (59), many which contain sensitive Bonneville cutthroat trout habitat, and a species designated as a Wyoming Game and Fish Department (WGFD) Species of Greatest Conservation Need (SGCN- 2010). - crosses through more important Critical Stream Corridors (Wyoming Game and Fish 2010) - crosses through more areas of Aquatic	Section 2.4.1.1 discusses the reasons for selecting the Preferred Route in Segment 4. Effects on historic trails, Fossil Butte National Monument, and the Rock Creek Ridge SMA were also important factors in selecting the Segment 4 route.

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			Conservation Areas (WGFD-2010) including the Hams Fork, Twin Creek and Bear River ACA, - crosses through important Bluehead Sucker habitat, Flannelmouth Sucker habitat, and Roundtail Chub habitat, all considered Species of Greatest Conservation Need, and which were not covered in the Final EIS,	
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	Rather than choose the least environmentally intrusive routes of Alternative 4 (identified in our comments as 4C and 4E), the BLM has chosen the route (4A) that: - has the greatest amount of cumulative overlap with big game species (4), - includes important parturition areas for elk, - includes important migration corridors for elk, pronghorn, mule deer, and moose, which have not been identified in the Final EIS, and - crosses through lynx units and wolf pack areas (WGFD).	Section 2.4.1.1 discusses the reasons for selecting the Preferred Route in Segment 4. Effects on historic trails, Fossil Butte National Monument, and the Rock Creek Ridge SMA were also important factors in selecting the segment 4 route.
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	Rather than choose the least environmentally intrusive routes of Alternative 4 (identified in our comments as 4C and 4E), the BLM has chosen the route (4A) that: ? has the most stream crossings (59), many which contain sensitive Bonneville cutthroat trout habitat, and a species designated as a Wyoming Game and Fish Department (WGFD) Species of Greatest Conservation Need (SGCN- 2010). ? crosses through more important Critical Stream Corridors (Wyoming Game and Fish 2010) ? crosses through more areas of Aquatic Conservation Areas (WGFD-2010) including the Hams Fork, Twin Creek and Bear River ACA, ? crosses through important Bluehead Sucker habitat, Flannelmouth Sucker habitat, and Roundtail Chub habitat, all considered Species of Greatest Conservation Need, and which were not covered in the Final EIS, ? has the greatest amount of cumulative overlap with big game species (4), ? includes important parturition areas for elk, ? includes important migration corridors for elk, pronghorn, mule deer, and moose, which have not been identified in the Final EIS, and ? crosses through lynx units and wolf pack areas (WGFD). All of this data is available through the Wyoming Game and Fish Department's 2010 Wildlife database updates. We urge the BLM to reconsider their Preferred Alternative and Proponent Alternative selection of Segment 4A, not only because of the current potential fish and wildlife impacts, but also because of the future impacts to this landscape's ecosystem as more and more energy development plans materialize.	Section 2.4.1.1 discusses the reasons for selecting the Preferred Route in Segment 4. Effects on historic trails, Fossil Butte National Monument, and the Rock Creek Ridge SMA were also important factors in selecting the Segment 4 route.

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100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	6. Resource Management Plan adequacy. The Green River BLM Resource Management Plan (RMP) is currently under revision in the Rock Springs BLM Field Office and the Draft RMP is expected to be released this summer. The Green River RMP (1997), while fundamentally containing fairly strong protection measures for some activities, is a dated document and does not account for an increase in broad landscape projects and their comprehensive impacts, such as those which may come with this Project. Nor does the Green River RMP consider the range of new species issues and impacts to the resource management area. We request that the BLM include the Rock Springs planning revision documents in the final decision, which means that the Record of Decision for this Project potentially be delayed.	Until a revised RMP is adopted (which could take years to complete), the existing plan guides management. There is no requirement that project-level analyses be put on hold until this process is complete.
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	7. Mitigation Options Need to be Expanded. In June 2012, a Mitigation Workshop was held in Washington, D.C. to examine the landscape scale mitigation opportunities for ways to more effectively conserve habitat and offset impacts of development actions. 3 Attended by more than 70 experts, including state and federal resource agencies, conservation organizations, and the energy industry, the workshop attempted to develop new approaches to mitigation on public lands. We suggest the BLM review the Workshop Summary and presentations (https://www.dropbox.com/home/Mitigation%20Workshop) in order to gain potential insight into some new mitigation principles that can be applied to this Project.	Mitigation options include the EPMs (summarized in Table 2.7-1) and the measures identified in Appendix C. The USFWS's Biological Opinion will determine the additional mitigation required to offset effects on listed species.
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	We have addressed our concerns regarding the BLM's need to reduce and limit the amount of potential disturbance along the transmission route, in particular along portions of Segment 4. We feel the BLM has thoughtfully considered the majority of the route and we understand the controversy that Section 4 has created. TU feels it is extremely important for the BLM to think about the long-term cumulative landscape impacts in choosing Route 4A. The construction activities along this section of the transmission route are significant and will have considerable environmental impacts. We urge the BLM to reconsider Route Segment 4A and instead select Route Segment 4C-4E in an effort to minimize habitat loss, watershed impacts, and to remain within an active right-of-way corridor.	The BLM and the Proponents are working with the County and State to reduce impacts through changes to the Segment 4 route in Lincoln County.
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	1. West-wide Energy Corridor Study required. The Final EIS references the 2009 West-wide Energy Corridor Programmatic EIS (PEIS) of 2009 but does not acknowledge the latest developments brought on by the 2012 settlement of a federal lawsuit that, among other things, required a reassessment of all the corridors and completion of a corridor study. The four principal components of the July 3, 2012 Settlement Agreement 1 requires the Agencies (BLM, US Forest Service, Department of Energy, and the Department of Justice) to: - Complete an interagency Memorandum of Understanding (MOU)	Studies to reevaluate the WWE corridor are being conducted as part of the land management planning process, as required by the settlement agreement. Where feasible, the Gateway West route and alternatives follow existing transmission lines; many of these are also in the WWE corridor. The EIS identifies the routes that are within or adjacent to a WWE corridor. Segment 1W, as an example, follows an existing transmission line and is also within a WWE corridor on federal land. This route is part of the Wyoming Governor's sage-grouse corridor network. A driving

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			<p>addressing periodic corridor reviews;</p> <ul style="list-style-type: none"> - Update agency guidance; - Update agency training; and - Complete a corridor study. <p>Until these components are completed, we believe the Final EIS cannot be approved as written or a supplement EIS is necessary.</p>	<p>force in establishing the Governor's corridors was the need to concentrate development, rather than create new disturbance across the landscape. Therefore, these corridors follow existing lines. In order to be consistent with the Governor's sage-grouse policy, the new line must be with the Governor's corridor in sage-grouse core habitat. This will be the case regardless of whether this is a WWE corridor or not; therefore, any change to the WWE corridor would not change the location of Segment 1W. The environmental effects associated with all routes are fully analyzed in this EIS regardless of whether they are within the WWE corridor or not.</p>
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	<p>2. Lack of cumulative analysis, multiple projects, and landscape impacts. Overall, due to expected levels of short-term and long-term permanent impacts to fish and wildlife habitat, as identified in the Final EIS, we feel the BLM did not adequately provide a thorough comprehensive and cumulative analysis for portions of the alternate line segments, specifically with respect to identified future transmission projects. The Final EIS specifically identifies additional transmission projects similar to Gateway West and because of these known projects, many of which are currently under draft development, the EIS did not fully consider the impacts of these future projects in a cumulative and comprehensive manner. Once the preferred alternative (in this case, the BLM Preferred Alternative and Proponent Proposed Route) is selected, it most likely becomes the right-of-way route for all other large transmission line projects. Thus, the scope of impacts becomes significantly broader and much more invasive since these large transmission projects require broad right-of-ways, extensive staging areas, and year-round access for regular maintenance operations.</p>	<p>Cumulative effects, including those associated with other proposed transmission lines, are analyzed in Chapter 4, pages 4-1 to 4-92. Landscape impacts are analyzed in detail throughout chapters 3 and 4, as well as in the appendices. For example, Appendix G includes a detailed analysis of effects on scenery associated with the plan amendments considered in the Project, Appendix K includes a detailed study on effects on agricultural, and Appendix M includes the biological assessment for listed species.</p>
100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	<p>3. Additional fisheries analysis is required. The Final EIS acknowledges that a range of environmental impacts are expected in the selection of the BLM Preferred Alternative and Proponent's Proposed Route, particularly in Segment 4 (Segment 4A). In fact, the Final EIS states in the Environmental Consequences discussion (Chapter 3) that permanent impacts are expected as a result of vegetation removal and sedimentation issues at stream/river crossings, including water withdrawals and the potential for permanent downstream impacts from increased sedimentation issues. In addition, we believe that the mitigation outlined in the Final EIS is insufficient or lacking for streamside reclamation impacts. By acknowledging that these impacts are inevitable, the BLM threatens the survival of native fish species in certain stream segments. We respectfully request the BLM to take a second hard look at the fisheries impacts that are likely to occur along the routes, with particular attention to Segment 4 (where 59 stream crossings are expected within the BLM's Preferred Alternative and Proponent Proposed Route).</p>	<p>Effects on fish are analyzed in Sections 3.10 and 3.11. The EIS discloses that there will be effects on fish, the biological assessment (Appendix M) analyzed the effects on listed fish species.</p>

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100997	CATHY PURVES	TROUT UNLIMITED, WYOMING	Because of the precedent-setting nature of this Project, TU continues to have concerns with issues related to watershed issues, stream crossings, and fish and wildlife species impacts. These concerns are centered primarily in Wyoming. We believe the BLM did not address our concerns despite our extensive analysis presented in our October comments.	Trout Unlimited requested additional stream by stream impact analysis be included in the FEIS. As noted in Appendix L (Response to Comments on the DEIS) additional information has been added as requested, including a detailed analysis of sagebrush habitat. The analysis covers over 3,000 miles of proposed and alternative routes. Exact stream crossings will not be known until a final route is selected and final design is completed. A very large number of plant, fish, and wildlife species are within the area crossed by one or more of the routes. Discussing each and every species is not needed to understand the effects on plants, fish, and wildlife. The level of detail requested in the comment for water crossings and plant/fish/wildlife species is beyond the level needed to make a reasoned choice between alternative routes.
100999	LISA W GANLEY, PETER NICOLAYSEN	COLE CREEK SHEEP COMPANY, PARKE RTON RANCH INC	We commend, support, and appreciate the BLM for its decision to recommend the routing of Section 1 W(a) in the existing utility corridor in the FEIS. This route is also the State of Wyoming's preferred route, and overall the appropriate project choice. We also thank Rocky Mountain Power for being available to listen to our concerns and for also selecting the 1 W(a) route for this segment of the proposed line. The alternate route, 1 W(a)-B, would be simply unacceptable in terms of its impact on resident sage grouse populations and its impairment of and disruption upon the environment and private property.	Noted.
101001	LARRY BETHKE		1. It has been asked of you to study the HVDC buried line, and you have said NO because it was not feasible. How can you say it is not feasible without even studying the process? Technology has advanced so much in the last 10 years, that you are basing your answer on old technology. Please have it studied by HVDC professionals before you just say NO. You are mandated by law to study all alternatives.	Please refer to Section 2.6.3.4 for an explanation of why this is not being considered on federal land. The level of ground disturbance would be unacceptable and the cost would be several times greater; therefore, the BLM could not require this on federal lands it manages.
101001	LARRY BETHKE		2. In past meetings with Power County you were asked to ADOPT Power County's alternative route proposals, not just study them. If you did study them you just did NOT ADOPT them, with no reason's. Again, Power County has been given SITING AUTHORITY BY THE STATE OF IDAHO. Please listen to Power County as they have the last word in siting. REMEMBER SITING AUTHORITY HAS PRECEDENT OVER EMINENT DOMAIN.	The BLM agrees that the County has siting authority for private lands. However, the BLM is responsible under federal law for issuing ROW grants on federal lands it manages. Impacts along Alternative 7K to sage-grouse and other sensitive species were too great for the BLM to select this route.
101001	LARRY BETHKE		3. The current proposal is not acceptable to Power County. Please meet with Power County to come to some sort of resolution to the siting of the GATEWAY WEST TRANSMISSION LINE.	The BLM will continue to work with local interests to search for a consensus route.
101001	LARRY BETHKE		4. Last but not least, please extend the comment period for another 90 days.	The BLM believes that a 60-day period is adequate. We received approximately 400 comment letters and emails during this period.
101002	MICHAEL KOCHERT	US GEOLOGICAL SURVEY, SNAKE RIVER FIELD STATION	I think it is a good stroke that the FEIS acknowledges the beneficial effects of transmission lines; however, the statement, "Transmission lines could have some limited beneficial impacts to raptors" (3.10 p. 54) tends to understate the beneficial effects of the lines. The FEIS falls short in that it does not recognize that success of raptors nesting on transmission towers was sometimes better	The FEIS included Steenhof et al. (1993) in considering the effects on raptors.

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			than raptors nesting on nearby natural substrates (Steenhof et al. 1993). The same study (funded in part by BLM) showed that transmission towers provided more secure nesting substrate than natural nesting sites, particularly for Ferruginous Hawks. This research showed that transmission line towers provided both new and alternative nesting substrate for raptors and ravens, and the 500-kV line provided raptors and ravens an opportunity to nest in areas where nest sites were previously unavailable. In that light, the assumption, as implied in the FEIS, that raptors nesting within 1 mile of the proposed transmission line will be adversely affected is not valid. During the 32 years since the construction of the Pacificorp 500-kV transmission line, we have observed that some Golden Eagles nested successfully numerous times on cliffs only 140 to 400 meters (459 to 1,312 feet) from the transmission line and continue to do so (Steenhof et al. 1993; USGS, Snake River Field Station, unpublished data).	
101002	MICHAEL KOCHERT	US GEOLOGICAL SURVEY, SNAKE RIVER FIELD STATION	The statement that “increased perching and nesting could lead to unsustainable levels of predation on small mammals, with the potential to decrease the raptors’ prey base” (3.10 p. 54 and earlier pages 29-30 of 3.10) needs to be supported with data or the scientific literature. As written, the statement is essentially unsubstantiated speculation. Studies in the NCA suggest that prey populations regulate raptor populations. I know of no evidence that raptors regulate mammalian prey populations or where raptors will deplete prey populations to the point of having a negative effect on the raptors themselves.	Noted.
101002	MICHAEL KOCHERT	US GEOLOGICAL SURVEY, SNAKE RIVER FIELD STATION	I believe the statement on 3.10, page 29 “increase predation rates on jackrabbits in SRBOP has the potential to impact the population size and health of golden eagles in SRBOP” is erroneous based on my 43 years of working on the Golden Eagle population in the NCA. This statement needs to be supported with evidence or the scientific literature. Research in the NCA and elsewhere showed that Golden Eagles essentially have exclusive home ranges and defend their foraging territories. Thus, it does not seem very likely that new transmission lines within existing territories would cause increased predation on rabbits. New eagles attracted to transmission lines would be taking jackrabbits outside existing eagle hunting territories and would probably have a positive effect on the overall eagle population.	We do not disagree with the comment; however, the text regarding the effects of the transmission line on golden eagles and rabbits was directly requested by the National Science Coordinator, National Landscape Conservation System, for the BLM Snake River Birds of Prey NCA.
101002	MICHAEL KOCHERT	US GEOLOGICAL SURVEY, SNAKE RIVER FIELD STATION	The statement on pages 29 and 30 on 3.10 “Golden eagle hunting ranges vary by season and location, but are typically very large (e.g., around 161.6 square miles [260 square kilometers]; DeGraaf and Yamasaki 2000)” needs to be clarified. I wonder why the FEIS cites DeGraaf and Yamasaki (2000), a reference that deals with New England, and the FEIS does not cite the Golden Eagle species account (Kochert et al. 2002) that presents home range information for Wyoming and Idaho (where the proposed lines will pass). These studies show that breeding season home range size ranged between 20 – 33 km ² , which are not very large as raptor ranges go. The non-breeding	The intent was to cite the maximum distance that this species would travel while hunting, which is why we used a record taken in other areas (which is where these maximum distances were recorded).

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			<p>season home range tends to be quite variable, ranging from 14 to 1,760 km² in Idaho.</p> <p>Literature Cited DeGraaf, R., and M. Yamasaki. 2000. New England Wildlife: Habitat, Natural History, and Distribution. 1st ed. University Press of New England, Lebanon, New Hampshire.</p> <p>Kochert, M.N., K. Steenhof, C.L. McIntyre and E.H. Craig. 2002. Golden eagle (<i>Aquila chrysaetos</i>). No. 684. In A. Poole and F. Gill [eds.]. The Birds of North America. The Birds of North America, Inc., Philadelphia, PA.</p> <p>Steenhof, K., M.N. Kochert and J.A. Roppe. 1993. Nesting by raptors and common ravens on electrical transmission line towers. Journal of Wildlife Management 57: 271-281.</p>	
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	<p>This office represents the Idaho Dairymen's Association, Inc. (herein "IDA"). Please accept this letter, and its attachments, as comments on behalf of IDA relative to the Gateway West Transmission Line Project Final Environmental Impact Statement, published April 26, 2013 (herein "FEIS"). IDA believes there are material errors in the FEIS analysis of effects of the proposal in relation to the animal environments related to agriculture (in particular - the dairy industry), and further that other reasonable alternatives could have been selected to avoid those significant impacts.</p>	Your comment that there are factual errors in the effects analysis and that routes could have been selected to avoid impacts to dairy facilities is noted. Responses to individual comments are listed below.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	<p>As part of the NEPA analysis, BLM must analyze the potential environmental impacts of the Project, whether those effects will be realized on public or private lands. See, e.g., Citizens for a Better Henderson v. BLM, 768 F.2d 1051 (10¹ Cir. 1985) (holding that, in an EIS for a proposed power transmission line, BLM was required to determine hazards posed by the electrical line to private citizens residing on private land adjacent to a federal right-of-way corridor). As part of the analysis of the Project, significant issues for analysis have been identified. As is relevant to the comments provided herein, the following significant issues have been identified- Land Use and Recreation • How would the project affect concentrated animal feeding operations (CAFO), which include dairy producers? FEIS, at 1-49.</p> <p>• How would the project affect current agricultural systems, including pivot irrigation and advanced positioning systems used in farm equipment? FEIS, at 1-49.</p> <p>Agriculture</p> <p>• How much agricultural land would be impacted, and what would the effects be? FEIS, at 1-50.</p> <p>• What would be the impacts to agricultural production including equipment operation and aerial spraying? FEIS, at 1-50.</p> <p>• Would there be a disruption to dairy operations and other types of CAFOs? FEIS, at 1-50.</p> <p>• Would the transmission line cause electronic interference with agricultural equipment? FEIS, at 1-50.</p>	Agricultural issues are discussed in Section 3.18 and in Appendix K of the FEIS. The EIS analyzed the hazards posed by the electrical line to private citizens in Section 3.21. The amount of agricultural land affected in each segment is disclosed in Section 3.17; the acres are based on indicative engineering, and the final design may alter these numbers.

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101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	Electrical Environment <ul style="list-style-type: none"> • Would electric and magnetic fields (EMF) associated with transmission lines cause health effects? FEIS, at 1-51. • Would stray voltage be a concern in the context of animal care where unwanted voltage on feeders, watering stations, or equipment such as milking machines, can lead to reduced food or water intake? FEIS, at 1-51. [Footnote 1] All of the above issues describe potential impacts to IDA members' dairy operations	These issues are discussed in Section 3.21.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	For example, one IDA member, Curtis DeVries, is a dairy producer with facilities located near Kuna Cave Road, Kuna, Idaho. This area of operation is indicated on Attachment 1, and is located within the area impacted by the preferred alternative. As is readily apparent, the transmission line would cut through the middle of two pivot-irrigated fields, and comes within less than one mile of milking parlors. Had BLM instead selected the Project proponent's proposed route, several miles to the south, any impacts to dairy producers would have been avoided. See Attachment 2.	The analysis in the FEIS is based on indicative engineering. Final siting will follow all safety and permitting requirements. The County is the permitting authority for private land in Idaho, not the BLM. The EIS agrees that stray voltage and electric shocks can cause problems under certain circumstances. The Proponents state that they have programs in place to assist farmers. They also state that "Due to the routing, distance to adjacent facilities, and design of the transmission line, the proposed line should not pose a concern." These issues are discussed in Section 3.21. See Figure 3.18-2 for an example of how towers would be placed in irrigated fields. See Appendix K and Section 3.18 for effects on agriculture.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	Another IDA Member, Aardema Dairy, is a dairy producer with facilities located just west of U.S. Highway 93 and the E 700 N Road, near Jerome, Idaho. This area of operation is indicated on Attachment 3, and is located within the area impacted by the preferred alternative. Another dairy, along River Ranch Road south of Gooding, is also adjacent to the preferred alternative. The transmission line in these areas will interfere with several pivot irrigated fields, and impact milking parlors and feedlots associated with the dairy that are located within the impact zone. Had BLM instead selected the Project proponent's proposed alternative route, just to the south, several other dairy operations would be located within the impact zone. These include operations along the E 2400 S Road near Hagerman, Idaho, and along the S 1300 E Road, also near Hagerman. See Attachment 4. For these reasons, the IDA suggests consideration of two other reasonable alternatives, one at the Midpoint Substation, proceeding north there from and bypassing the nearby dairy operations to connect back to the preferred alternative, and the other bypassing River Ranch Road south of Gooding to avoid that dairy operation. See Attachment 5.	The analysis in the FEIS is based on indicative engineering. Final siting will follow all safety and permitting requirements. Note that the County is the permitting authority for private land in Idaho, not the BLM. The EIS agrees that stray voltage and electric shocks can cause problems under certain circumstances. These issues are discussed in Section 3.21.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	Yet another IDA member, Bettencourt Dairies, is a dairy producer with facilities located along the 800 S Road south of Kimberly, Idaho. This operation is indicated on Attachment 6, and is located within the area impacted by the preferred alternative. As is readily apparent, the transmission line would come within less than one mile of milking parlors. Had BLM instead selected the Project proponent's proposed alternative route, incoming from the south, any impacts to dairy producers would have been avoided. See Attachment 7.	Your comment is noted. The BLM does not make decisions as to siting on private land; the County has this authority. The EIS did not consider placing a transmission line 1 mile from a facility would be an issue. The analysis in Section 3.21 does not indicate that this would be an issue that could not be resolved through proper grounding of equipment.

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101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	There may be other affected dairy operators, and the concerns of IDA extend to all dairy operations potentially impacted by the Project. After the FEIS was published, the detailed mapping of CAFOs conducted by Tetra Tech was requested of the BLM, but it has yet to be received. [Footnote 2] After analysis of that data, once provided, the IDA will be better positioned to identify all impacted dairies, and reserves the right to supplement these comments once the BLM provides the previously requested information.	The BLM project manager does not have a record of this request. We apologize for this misstep. In response to this comment, we mailed a CD to you with the file we used to identify the concentrated animal feeding operations (CAFOs), which include dairies. The report referenced in the FEIS has the entire vegetation and wildlife habitat study for the 2-mile-wide analysis area used for the EIS. The GIS file is over 100 MB. It includes agriculture businesses along with every polygon of vegetation type, wildlife habitat type, agricultural land, developed land, etc. The file we provided will better show the CAFOs that we identified for the analysis.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	Stray Voltage and its Effects The primary concern of the IDA with respect to location of the transmission line is stray voltage and its effects on the domestic animal environment. To avoid these effects, the transmission line should be located away from dairy operations, milking parlors and dairy feedlots. Stray voltage is basically a form of neutral-to-earth voltage to a specific location. See Abed, Salem & Burke, Evaluation of Induced Stray Voltages from Transmission Lines using EMTP, at 1 (copy at Attachment 8). Most concerns with stray voltage in the dairy industry occur due to induction. Id. Animals are sensitive to stray voltage and suffer effects there from even when humans may not notice the stray voltage. Id. At 1 volt of contact, a cow experiences negative effects such as decreased milk production, reluctance to eat or drink, and other erratic behavior are noticeable. Id. In the Abed, Salem & Burke study, a 13.8 kV transmission line, with three-phase multi-grounding consistent with the IEEE National Electric Safety Code, was analyzed for stray voltage effects. Id. at 2. The study found that such a transmission line, through almost any scenario, induced stray voltage of an amount significant enough to effect animal behavior. Id. at 5. Recall that the Project will involve 230 kV and 500 kV transmission lines, well in excess of the study model, making it a near certainty that stray voltage induction will be significant in the dairy environment. Exacerbating the stray voltage effects of transmission lines is the effect of nearby distribution lines. Studies have confirmed that transmission lines will cause parallel distribution lines within one mile to induce stray voltage. See Patel & Lambert, Induced Stray Voltages from Transmission Lines (copy at Attachment 9 and Attachment 10). In the referenced study, the experts examined the interplay between a 500 kV transmission line and a 13kV distribution feeder line. Id. at 1. They found induced stray voltage as high as 18 volts along a distribution feeder parallel to the transmission line- an amount of voltage clearly enough to effect animal behavior. Id. Of the stray voltage, 73% was due to the load current in the 500 kV transmission line, while the remaining 27% was due to the distribution feeder. Id. The experts were able to rule out any other contributors to stray voltage, such as corroded neutrals or	Your comments on the analysis in Section 3.21 are noted. The BLM is not an expert on this issue and relied on the Proponents and for a response. This is an issue that only affects private land, the BLM has no authority to require of prohibit any of the Proponents' actions on private lands. While the route selected by the BLM for federal lands does affect the location of the line on adjacent private land, it does not prohibit the County from requiring setbacks and micrositings to avoid impacts to dairies and other operations. In Idaho, there are long sections of the line between federal parcels. The local governments, through zoning, can determine how close the transmission can be placed near residences, businesses, and irrigation systems. The BLM recommends (but cannot require) that the Proponents work with the County and the landowners to resolve conflicts.

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			<p>other conditions on the farm property. Id. They then evaluated various means of mitigation. Id. at 2-5. It was determined that traditional means of mitigation, such as a balanced load on a three phase circuit, was not effective to eliminate the stray voltage. Id. at 6. Also, installing neutral isolators at areas with high stray voltage would cause an increase in stray voltage in other areas. Id. So, in essence, proper mitigation would require isolation transformers at nearly all distribution areas parallel to the transmission line, and cable and telephone grounding circuits would need to be isolated from the electric isolation transformers. Id. In most cases, this would require significant modifications to existing systems. The FEIS acknowledges that dairy farms could be subjected to stray voltage once the Project goes live. FEIS, at 3.18-25. However, the FEIS incorrectly concludes that stray voltage effects on cows are due to "electrical equipment on the farm and local electrical wiring, not because of the operation of nearby transmission lines." Id. The actual scientific data, as detailed above and in the attachments, demonstrates that transmission lines carrying loads equivalent to the Project contribute 73% of the stray voltage in areas where power is locally distributed within one mile of the transmission line, and which is experienced after isolating all on-farm contributors.</p> <p>The FEIS also concludes that "most cows would need a current of 3 to 4 volts before behavioral changes could be noticed." FEIS, at 3.18-25. This is another error in the FEIS conclusions. Available science actually indicates cow behavior changes at as little as one volt of induced stray voltage. Moreover, the test case on a transmission line comparable to the Project found induced stray voltage as high as 18 volts, admittedly enough to effect dairy cow behavior under the FEIS conclusion. The 500 kV proposed transmission lines will undoubtedly induce stray voltage of a high enough amount to effect dairy cow behavior, and the FEIS fails to recognize this fact and analyze the alternatives in light of this information.</p>	
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	<p>Later, the FEIS concludes that "transmission lines such as the one proposed are not normally associated with ... stray voltage because the transmission line is a balanced, three-phase line." FEIS, at 3.21-12. This is yet another flaw in the FEIS. As detailed above, test cases on transmission lines as low as 13.8 kV, with three-phase balanced loads, have found induced stray voltage high enough to effect animal behavior.</p>	<p>Your comments on the analysis in Section 3.21 are noted. While the route selected by the BLM for federal lands does affect the location of the line on adjacent private land, the route in Idaho crosses long areas of private land between the federal parcels. The route across federal land does not dictate how the county requires micrositng to avoid impacts to dairies and other operations on private lands. The BLM recommends (but cannot require) that the Proponents work with the County and the landowners to resolve conflicts.</p>
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	<p>The FEIS also concludes that the Project should not pose a concern to dairies in Idaho because the preferred route is not close enough to any dairies to cause an impact. This is simply untrue. As detailed above, at least two dairies are within the impact zone of the preferred route, and the available studies indicate that stray voltage with a negative effect on</p>	<p>Your comments on the analysis in Section 3.21 are noted. The BLM recommends (but cannot require) that the Proponents work with the County and the landowners to resolve this issue.</p>

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	STEENSON		cow behavior will likely occur as a result. The FEIS fails to acknowledge this, and fails to accept other alternatives that could avoid such an impact.	
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	The FEIS concludes that "Gateway West should not affect local distribution systems or create a change in the occurrence of stray voltage." FEIS, at 3.21-33. This is yet another fundamental flaw in the FEIS' conclusions regarding stray voltage. The scientific studies, detailed above and attached, show that a 500 kV transmission line will significantly effect induced stray voltage, will heighten the same, and will contribute as much as 73% of the resultant stray voltage.	Your comments on the analysis in Section 3.21 are noted. The BLM recommends (but cannot require) that the Proponents work with the County and the landowners to resolve this issue.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	The FEIS is significantly flawed with respect to its analysis of induced stray voltage and the effect thereof on dairy operations. The FEIS fails to acknowledge the effects the stray voltage will have on domestic animal behavior. The FEIS should have appropriately addressed these issues as explained above.	Your comments on the analysis in Section 3.21 are noted. The BLM recommends (but cannot require) that the Proponents work with the County and the landowners to resolve this issue.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	The FEIS is significantly flawed with respect to its analysis of induced stray voltage and the effect thereof on dairy operations. The FEIS fails to acknowledge the effects the stray voltage will have on domestic animal behavior. The FEIS should have appropriately addressed these issues as explained above. In light thereof, with respect to Segment 8, from 1-84/Boise Stage Stop to Hemingway Substation, the FEIS should have selected the Project proponent's proposed route.	Your comments on the analysis in Section 3.21 are noted. The BLM recommends (but cannot require) that the Proponents work with the County and the landowners to resolve this issue.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	Also with respect to Segment 8, from the Midpoint Substation to north of Glenns Ferry, the FEIS should have selected, or at least considered, two different alternatives, as reflected on Attachment 5, so as to avoid dairy impacts.	Noted. See Section 2.4.1.1 for the reasons the BLM selected the Preferred Alternative for federal land. The BLM will continue to work with local interests to search for a consensus route.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	With respect to Segment 7, from Albion Valley Road to the Cedar Hill Substation, the FEIS should have selected the Project proponent's proposed alternative route. These selections would have completely avoided any dairy impacts.	Noted. See Section 2.4.1.1 for the reasons the BLM selected the Preferred Alternative for federal land.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	The IDA suggests that either: (1) any record of decision select the above alternatives with respect to the designated segments; or, alternatively, (2) that further study and analysis be conducted of the Project corridor, in light of the above stray voltage discussion, and a supplemental EIS be issued for further comment, analysis and discussion.	Noted.
101003	BONNIE BUTLER, DAVID CLAIBORNE, CELIA GOULD, DANIEL STEENSON	IDAHO DAIRYMENS ASSOCIATION INC, SAWTOOTH LAW OFFICES	[Footnote 2: This office requested that information by email to Gateway West WYMail@blm.gov on May 9, 2013. The email requested the Tetra Tech 2010a report and mapping referenced at Ch. 3, Sec. 18, pg. 12 of the FEIS. No response to that communication has been provided.]	The BLM project manager does not have a record of this request. We apologize for this misstep. In response to this comment, we mailed a CD to you with the file we used to identify the concentrated animal feeding operations (CAFOs), which include dairies. The report referenced in the FEIS has the entire

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				vegetation and wildlife habitat study for the 2-mile-wide analysis area used for the EIS. The GIS file is over 100 MB. It includes agriculture businesses along with every polygon of vegetation type, wildlife habitat type, agricultural land, developed land, etc. The file we provided will better show the CAFOs that we identified for the analysis.
101004	CONNIE HOLLOWAY		The cheapest, less risky and most efficient plan would be for the Companies to use existing power corridors whenever possible, it makes no sense what so ever in my mind to do anything else.	Noted.
101004	CONNIE HOLLOWAY		Furthermore, I understand private landowners will be compensated for any encroachment on their land. I don't own land around the Owyhee Mountains where the Route 9E and Segment 9 are proposed to go. It is mostly BLM land which is why my letter is directed to you. I am not sure BLM would be compensated, but I am a citizen of this country, and it belongs to the government to manage, so it is my land too. I want to say NO AMOUNT of money could be offered in exchange for putting the proposed Route 9E below the Owyhee Mountains. And no amount of money could be offered me that could replace the feeling I get riding and hiking here, or sitting on my land enjoying the natural beauty in all the changing seasons.	BLM charges a yearly fee for the ROW. Your comments on the value of public land to you are noted.
101004	CONNIE HOLLOWAY		In conclusion, I am pleading to the BLM to protect the surrounding area and the Owyhee Mountains, and demand the Companies use as much as possible existing routes that already have transmission poles and lines.	Noted. Refer to Chapter 1 for the Project's purpose and need. The BLM will continue to work with local interests to search for a consensus route.
101004	CONNIE HOLLOWAY		I strongly oppose Segment 9 as it traverses private property , will destroy our beauty and natural habitat.	As you note above, the majority of the Preferred Route in Owyhee County is on public land. Approximately 95 percent of Alternative 9E is on public land, the same as the County's preferred route (9D). Both routes cross 3.3 acres of private land.
101004	CONNIE HOLLOWAY		I strongly oppose 9E which impacts our open space, where we hike and ride, and private and historical property and the endangered Sage grouse.	Noted.
101004	CONNIE HOLLOWAY		I also strongly oppose 9G . It has unacceptable impacts to cliff nesting and riparian nesting raptors. It also spoils the natural beauty we so strongly value.	Noted.
101004	CONNIE HOLLOWAY		If there has to be more power lines then I do support 9D . The route should follow existing 138-kV line including the section where it crosses the Snake River Canyon ,just upstream from Swan Falls. It will have less environmental impact because of the existing road. 9D will not adversely affect raptors and if properly designed could enhance raptor populations. The BLM should encourage Idaho Power to stack the new 500-KV line on the existing 139-KV line.	Your support for Alternative 9D is noted. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.
101004	CONNIE HOLLOWAY		I also strongly endorse the Phased Decision , this will allow more time for the citizens and the BLM to find better solutions to the problems this project is creating for private citizens and wildlife by destroying their natural habitat and place of worship.	Your support for a phased decision is noted.

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101004	CONNIE HOLLOWAY		I believe that the best way is to limit stress on the environment and limit the degradation of the natural beauty of the environment .To do this the Project would need to utilize existing power corridors and not to encroach on our existing open spaces. I mentioned this to three different Power company personnel at a previous informative meeting in Murphy. I told them I thought they should be using all existing power corridors ,why did they have all these new proposed routes? They told me they could not use existing corridors where there were already transmission lines because they were worried about fires, redundancy .Their argument still did not make any sense, I don't think that is a good theory on their part, but they happened to live in Salt Lake City and this was not in their backyard.	See the discussion on reliability in Section 1.3 of the FEIS.
101004	CONNIE HOLLOWAY		Furthermore, I believe that there is an increase risk of fire from the Project. We that live on Bates Creek road worry about fires because we are out of fire district. I have noticed that the Owyhees get most of the weather, the snow, the rain, and the electrical storms which increases the risk of fire in the region. I believe that putting the transmission towers and lines right above us would increase our chance for fires thus making it very dangerous for surrounding small communities. I am convinced there are more chances for fires on the 9E proposal.	Fire is a concern, as the FEIS states. A fire prevention and suppression plan approved by the applicable agencies is required.
101004	CONNIE HOLLOWAY		My neighbor, Stephanie Teeter , organizes 12 horse endurance rides a year and besides me ,people come from all over the USA, Canada , Europe , Australia ,Middle East , the World actually , to ride in our beautiful open area, of high desert , mountains , the snake river , mesas ,canyons ,winding creeks. With the help of BLM and private landowners we can ride for miles in any direction, in an unspoiled area. You can see forever when you are on top of the plateau, the skys the limit. In 3 directions you will not see a building let alone a power line. Our rides cover a distance from 30 , 50, 75, and 100 miles so we have all gotten to know the area intimately , not just staring at the beauty, but riding amongst it. The Proposed 9E alternative goes directly through this area below the mountains.	The BLM is aware that the area is used for horse rides.
101004	CONNIE HOLLOWAY		I am worried in this day and age where there is a disregard for nature and natural beauty and the benefits we as people reap from being in nature; much has been sacrificed in our world for financial gains. Financial profit and loss are often how decisions are made. I have seen firsthand the Northern Spotted Owl sacrificed for logging interests, and ask any experts, they are on their way to extinction, another species gone. Money comes and goes but once you destroy something, a species, and ecosystem, you often never get it back, and only later realize the benefits it had. I know it does not really matter on a grand scale that I am fighting for the surrounding area of the Owyhee Mountains from the stance of beauty alone,against two giant corporations ,that is not going to be reason enough for them to be protected in this day and age. How about the health issues, the	Power use increases as population and electronic equipment use increases. Updating the grid, which is several decades old, is an important national priority.

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			correlations of high voltage lines and cancer ? How about the issue of protecting the Greater Sage Grouse's habitat? What is it going to take for us to protect ourselves and our area from these two Power Companies?	
101004	CONNIE HOLLOWAY		I do not support the Project as proposed and I am fully aware that Project will likely proceed as planned in spite of my concerns and the concerns of similar minded citizens. However, I do want to respond to the Project as proposed by the Rocky Mountain Power Company and Idaho Power Company (the Power Companies). I am extremely uncomfortable and threatened with the Project as I have understood it. Why? because the Power Companies are publicly owned and primarily beholden to their shareholders to provide financial gains. In my opinion, this project is more about selling power to California and elsewhere, with extra power provided by a less populated region of the country that have surplus power to sell, like Wyoming and Idaho. I just can't imagine that the Project is really all about the needs of citizens of Idaho or Wyoming but more about profits gained from selling power to huge markets elsewhere in the country. Yet, I and my fellow citizens will be asked to sacrifice our environment quality for your power lines, your profits, and to provide power to other regions of the country.	Your opposition is noted.
101004	CONNIE HOLLOWAY		Even if the Project is purely about the needs of the citizens of Idaho and Wyoming, I am still not willing to let the beauty and natural energy of the Owyhee Mountains be sacrificed for the Gateway Projects plan to construct giant steel structures and transmission lines and run them across the lower Owyhee Mountain range, as proposed in Segment 9E of the project . Therefore, I am counting on the Bureau of Land Management (BLM) and hopefully Owyhee County Planning and Zoning , to protect the Owyhee Mountains for me, other citizens ,and future folks ,who enjoy the open spaces and the serene beauty the mountains ,surrounding canyons,and plateau provide, and the access they provide for riding horses and motorized vehicles, biking, and hiking. I am counting on the BLM , the State and especially Owyhee County Commissioners to protect the interests of the people who live here and not the corporate interests. I think they should demand the Project use existing power corridors wherever possible.	Your opposition is noted.
101004	CONNIE HOLLOWAY		I am counting on the BLM , the State and especially Owyhee County Commissioners to protect the interests of the people who live here and not the corporate interests. I think they should demand the Project use existing power corridors wherever possible.	Noted.
101004	CONNIE HOLLOWAY		It is rare to have these mountains in my backyard, and they are the reason I bought 40 acres up Bates Creek Road out of Oreana. I am the last house off Pickett Creek, and I have underground wiring as well. It is the most magical and serene place. Not a house or a light or a wire to be seen from my house to the mountains. Except for the occasional flyovers from Mountain Home, it is quiet. Coyotes, frogs, crickets and	The natural beauty of the area is recognized in the EIS (see Section 3.2).

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			owls are what you hear at night. Every evening I walk up the hillside and get on the plateau and follow the setting sun, not a soul in site usually, and ahead lay the vibrant Owyhee Mountains. Not too far from where an alternative proposed route 9E was offered up, by a few individuals, to the BLM and Power Companies out of desperation to keep them away from Oreana. Everyone is desperate here to keep these obtrusive ugly and unhealthy structures out of their eyesight, and out of their backyard, something a Company or shareholder could care less about, despite the propaganda in brochure that says they are not that noticeable. Trust me they are, I see them everytime when I drive the highway to town. But I would rather see them along the highway, and leave the areas away from the roads alone.	
101005	CHRIS STEWART		I am very concerned about some of the options being considered for the new Gateway west transmission line project. I am strongly opposed to the "BLM Preferred routes" segment 8B and 9E and proponent's proposed segment 9) as expressed in the Final Environmental Impact Statement.	Your opposition to Preferred 8 and 9E is noted.
101005	CHRIS STEWART		I strongly SUPPORT segment 8 and segment 9D.	Your support for Segment 8 and Alternative 9D is noted.
101005	CHRIS STEWART		Segment 8B and 9E (BLM preferred routes) would burden private citizens with costs of millions of dollars.	Your concern with the cost of Preferred 8 and 9E is noted.
101005	CHRIS STEWART		Should the BLM's Preferred Routes come to fruition, the citizens and governmental authorities of Idaho's reached collaborative consensus would be turned back as meaningless by Washington DC.	It is true that local groups and the BLM worked to find a consensus route. However, senior BLM staff reviewed the analysis and concluded that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
101005	CHRIS STEWART		The "enhancement requirements" to Birds of Prey can be met within the construction processes of the project through the Morley Nelson Birds of Prey defined area.	The "enhancement requirements" to Birds of Prey cannot be met within the construction processes. The construction process involves clearing of vegetation for the ROW and the roads; the avoidance, minimization and mitigation (the EPMs) do not meet the mitigation requirements for enhancement.
101005	CHRIS STEWART		I have talked with many of my neighbors as well and we all strongly feel the same way. Please DO NOT use the BLM Preferred routes or the proponents segment 9.	Your opposition to Preferred 8 and 9E is noted.
101005	CHRIS STEWART		Please use routes outlined in segment 8 and 9D.	Your support for Segment 8 and 9D is noted.
101006	JAMES W BURCH		I strongly oppose BLM's preferred Segment 8B for a number of reasons, not the least of which is the serious detrimental impact that such routing of transmission lines would have on the future development of the cities of Melba and Kuna. Placement of the towers and power lines on private property outside of the Morley Nelson Snake River Birds of Prey National Conservation Area ("Birds of Prey Area") will stifle what would otherwise be upscale residential housing and small farms along and to the south of such lines. Melba will be cut	Your opposition to Preferred 8 is noted.

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			off from the rest of the valley in an “other side of the tracks” fashion, and estate style, large acreage housing on the bench south of Kuna will not materialize. Development will still occur, but it will be of an undesirable nature that will not increase the property values of Melba or Kuna, and, by virtue of the severely devalued nature of the property in the area of the towers and power lines, will attract persons and businesses that are far less likely, willing or able to support present and future initiatives related to the Birds of Prey Area.	
101006	JAMES W BURCH		<p>For the past several years, citizens, businesses and community leaders in the impacted areas have worked extensively with BLM officials and Idaho Power to develop a feasible and responsible route for the transmission lines that would (a) take into account the goals of the BLM, (b) support habitat and protected species within the Birds of Prey Area, (c) minimize the economic and social impact on private citizens, (d) reduce the potential detrimental effect to the cities of Melba, Kuna and the affected regions of Ada County and Canyon County, and (e) be cost effective for Idaho Power and the ratepayers of Idaho. The combined wisdom and labors of all persons involved over countless meetings was a consensus that Segment 8 is the best route for the transmission lines. Routing within Segment 8B would override all of such efforts. The long-term result, if Segment 8B is ultimately implemented, will harm all of the affected parties, and will negatively affect the very benefits that were sought to be safeguarded by the establishment of the Birds of Prey Area.</p> <p>I urge the BLM to reconsider its support of Segment 8B and to accept the collaborative recommendation of local BLM officials, Idaho Power and affected citizens, businesses and local governments to route the Gateway West transmission lines through the Birds of Prey Area in the manner proposed by Segment 8. I know that enhancement requirements in the Birds of Prey Area can and will be met if the Segment 8 route is accepted. The end result of such action will satisfy all of the concerned parties, and will enhance the Birds of Prey Area.</p>	It is true that local groups and the BLM worked to find a consensus route. However, senior BLM staff reviewed the analysis and concluded that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
101007	MARTHA DRODGE, DAVID HURD		While the precise routing of the transmission line is being determined, the project planners should note that numerous state- and locally-owned public parks along the route are perpetually protected solely for public outdoor recreation purposes by the Land & Water Conservation Fund Act enforced by the National Park Service. Installing the transmission line within one of these LWCF-protected boundaries -- known as the "6(f) Boundary" for section 6(f) of the LWCF Act -- may provoke a conversion requiring acquisition of a replacement parcel equal to highest and best economic value in current dollars. If the project planners believe the transmission line's routing will come close to a state- or locally-owned public park, please contact this Martha Droge at Martha_j_droge@nps.gov.	The BLM is aware of this.

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101008	PETE NIELSEN		Dear Sir, I'm Representative Pete Nielsen District 23B of The Idaho House of Representatives sending in my comments on the Gateway West Transmission Line Project. I'm in support of the GWTLTP as stated in the letter dated March 28, 2013 by the Owyhee County Task Force under the signature of Frank Bachman, chairman.	Your support for the Owyhee task force route is noted.
101008	PETE NIELSEN		Under Snake River Birds of Prey National Conservation Area in the State of Idaho Public Law 103-64 Sec. 3 (a) 2 states " The purposes for which the conservation area is establish, and shall be managed, are to provide for the conservation, protection. and enhancement of raptor populations and habitats and the natural and enviromental resources and values associated therewith,and of the scientific, cultural, and educational resourses and values of the public lands in the conservation area. The GWTLTP will actually fit very nicely into this area when looked at through the eyes of the birds of prey. What better place could they have in making their nests and rasing their young from man and natural predators than the tops of the electrical towers without any danger of electrical shock in their goings and comings. These towers are constructed so that any birds of prey in this area will not be killed by electrical shock. From these towers the birds of prey have excellent access to their food supplies whether on close by irrigated farms or the desert itself. This certainly will be an enhancement through the eyes of the birds of prey and to us humans because there will be many more birds for viewing and enjoying. Nothing has been done to create harm to their habitats. In fact the birds will take advantage of these towers and include them quite naturally into their habitats and the same goes for the natural and enviromental resources by the birds having a better access and use of this area. The food supply will remain intact in the local area and in the close by farming area the supply there will not grow smaller because of farm ground being take out of production by the GWTLTP. The birds will actually benefit a great deal and really isn't that why this area was created in the first place. The scientific, cultural, and educational resources and values of the public lands in the conservation area are also enhanced when viewed and taught how man and animals can live very nicely together enhancing the whole namely the Birds of Prey and the GWTLTP.	The issue is not the towers killing raptors, but the level of ground disturbance and new access roads in the NCA. The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that cross through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), SWEETWATER COUNTY, CONSERVATION DISTRICT, SWEETWATER COUNTY, BOARD OF COMMISSIONERS,	The Lincoln Conservation District (LCD) and the Sweetwater County Conservation District (SWCCD) are also members of the Coalition. Wyoming law authorizes the conservation districts to assist, promote, and protect the natural resources that include the soil, water, wildlife and other related resources, to develop water and to prevent floods, to stabilize the ranching and agriculture industry, to protect the tax base, and to provide for the public safety, health and welfare of the citizens. Wyo. Stat. §11-16-103(b). Conservation districts are charged with conserving, protecting and developing these resources on all lands, both private and public, within the conservation districts. The alternatives	The BLM is continuing to work cooperatively with Lincoln County, the City of Cokeville, the Lincoln County Conservation District, and the State of Wyoming to find a route that meets everyone's needs. Remaining within the Wyoming Governor's sage-grouse corridor was a primary driver of the route in Wyoming. The Governor's executive order does not include an option of routing new transmission lines through core habitat outside the Governor's corridor in order to avoid private land.

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		LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY), COALITION OF LOCAL GOVERNMENTS	provided in the proposed public land Resource Management Plan Amendments impact the management of lands and resources covered by the conservation districts' land use plans. Conservation districts accomplish these policies and mandates through research and education, implementation of erosion control, water, and range projects with landowners, development of comprehensive plans, demonstration projects, providing financial and other assistance to landowners, management of flood control projects or lands under cooperative agreements with the United States and/or State of Wyoming, and adoption of rules and ordinances. Wyo. Stat. §11-16-122(b). The LCD revised and adopted its land use plan in 2010. Ex. 3, LCD, Land Use and Natural Management Long Range Plan 2010-2015 (2010). The SWCCD revised and adopted its land use plan and policy in 2011. Ex. 4, SWCCD, Land & Resource Use Plan & Policy (Feb. 3, 2011). The LCD is also adversely affected whereby the proposed route will affect private land rather than federal lands. By pushing the impacts onto private lands, the BLM has not mitigated the impacts it has merely displaced them.	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	The Coalition members protest BLM's Land Use Plan Amendments as they apply to Segment 4, which crosses land in Lincoln County south of Cokeville Wyoming and as identified in Appendix F of the FEIS for the Gateway West Transmission Line Project. The Coalition members demonstrate that this segment location is: (1) inconsistent with the Lincoln County and LCD land use plans and BLM's failure to modify the transmission line route violates Section 202(c)(9) of the Federal Land Policy and Management Act (FLPMA) and effects a partial taking of private land without compensation by reducing the value of private lands;	Please refer to the BLM's official response to the Coalition's protests (Appendix K to the ROD).
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	The Coalition members protest BLM's Land Use Plan Amendments as they apply to Segment 4, which crosses land in Lincoln County south of Cokeville Wyoming and as identified in Appendix F of the FEIS for the Gateway West Transmission Line Project. The Coalition members demonstrate that this segment location is: (2) in violation of the National Environmental Policy Act (NEPA) due to BLM's failure to consider proposed mitigation measure of burying eight miles of the line that will be closest to Cokeville or an alternative route proposed by the Coalition to mitigate the adverse impacts and conflicts with the Lincoln County and LCD land use plans;	Please refer to the BLM's official response to the Coalition's protests (Appendix K to the ROD).
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	The Coalition members protest BLM's Land Use Plan Amendments as they apply to Segment 4, which crosses land in Lincoln County south of Cokeville Wyoming and as identified in Appendix F of the FEIS for the Gateway West Transmission Line Project. The Coalition members demonstrate that this segment location is: (3) based in improper factors, because the affected segments of the Sublette Cutoff that lack the required integrity to merit continued	Please refer to the BLM's official response to the Coalition's protests (Appendix K to the ROD).

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			protection, a fact that BLM improperly dismisses, and thus, BLM's rationale to move the route next to Cokeville residences is arbitrary and capricious	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>The Coalition members protest BLM's Land Use Plan Amendments as they apply to Segment 4, which crosses land in Lincoln County south of Cokeville Wyoming and as identified in Appendix F of the FEIS for the Gateway West Transmission Line Project.</p> <p>The Coalition members demonstrate that this segment location is: (4) in violation of the Kemmerer RMP by authorizing a permanent transmission line through lands classified as VRM Class II for retention of the view shed. FLPMA requires BLM to manage public lands in accordance with the RMP, 43 U.S.C. §1732(a) and, in this case, the plan amendments flatly contradict the VRM Class while not amending the VRM decisions.</p>	Please refer to the BLM's official response to the Coalition's protests (Appendix K to the ROD). The transmission line would not be in conformance with the VRM class, therefore, the FEIS includes an amendment to the Kemmerer RMP.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>CLG members, Lincoln and Sweetwater Counties, were cooperating agencies throughout the EIS process. Gateway West FEIS at ES-2. The Coalition, on behalf of its members, raised all legal and factual arguments submitted in this protest internally as a cooperating agency and during the scoping period, on the proposed alternative routes, on the Gateway West Transmission Line Project Draft EIS (DEIS), and on the Administrative FEIS (FEIS). See Ex. 5, CLG Comments on Potential Alternative Routes (Sept. 4, 2009), CLG Supplemental Comments on Revised Siting (March 29, 2010); Ex. 6, CLG Comments on DEIS (Oct. 28, 2011); Ex. 7, CLG Comments on FEIS (Nov. 9, 2012). Further, it expressed its concerns regarding the alternative routes and land use plan amendments in submitted comments as a cooperator during the cooperator meetings and before the release of the DEIS. As soon as it became apparent that the alternative routes selected by BLM for the Gateway West Transmission Line project could impact a significant amount of private land and residential areas, the Coalition objected to the disproportionate impacts to private lands. CLG argued that adverse impacts on private lands should only occur as a last resort compared to impacts on public lands and that BLM must fully disclose any eminent domain or condemnation issues through the EIS process. Ex. 5, CLG Comments on Alternative Routes at 4; see also Ex. 7, CLG Comments on FEIS at 1-6 (proposing mitigation methods and alternative routes to minimize impact to private lands and residential areas). Impacts to private land require County approval and landowner consent. Id. Further, the Coalition has provided comments based on actual accounts of the condition of the historic trail segments near Cokeville, Wyoming, including the Sublette Cutoff, that such segments no longer possess the physical integrity necessary to be eligible for designation as National Historic Trails. Ex. 6, CLG Comments on DEIS at 5-11; Ex. 7, CLG Comments on FEIS at 6-10. As such, associated VRM restrictions and National Historic Trail (NHT)</p>	Please refer to the BLM's official response to the Coalition's protests (Appendix K to the ROD). The BLM has continued to work with the county on siting issues. The BLM recognizes that the county disagrees with some decisions in the Kemmerer RMP protecting historic trails. The EIS discusses eminent domain laws in Section 1.6.

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			viewsheds may not be used to restrict development near trails no longer exhibiting the physical integrity necessary to be designated National Historic Trails. Id. Based on these considerations, the Coalition proposed mitigating the impacts to private lands and residential areas along the proposed route by burying the transmission lines for approximately eight miles or in the alternative, connecting the proposed route with alternative route 4C south of Cokeville to avoid private residential areas. Ex. 7, CLG Comments on FEIS at 1-6. BLM failed to consider or even respond to either of these proposals. Gateway West FEIS at App. L 189-193.	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	Agency action under the Administrative Procedure Act (APA) is to be set aside if it is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. §706. An agency action is arbitrary and capricious when it conflicts with federal law or policy. Rademacher v. Colo. Ass'n of Soil Conservation Districts Medical Benefits Plan, 11 F.3d 1567, 1569 (10th Cir. 1993). The proposed Land Use Plan Amendments conflict with FLPMA, because they contradict Lincoln County and LCD plan provisions. There is no federal law that authorizes BLM to override the local land use plans and approve actions not authorized in the 2009 RMP contrary to FLPMA.	FLPMA does not require that BLM make management decisions for federal lands based on local plans, only that the BLM coordinate with local governments. The BLM has coordinated with state and local governments throughout the project and will continue to do so.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	These comments incorporate and adopt the comments filed by Lincoln County, Wyoming. The comments also incorporate the issues raised in the protest filed on May 28, 2013.	Noted.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	While BLM responded to many of the earlier comments regarding proposed routes, there remains a single but very important issue. The FEIS proposes in the preferred alternative to route the transmission line through the residential areas of Cokeville, Wyoming. [Proposed Route 4]. The Coalition filed a protest on May 28, 2013 on several grounds including the fact that BLM failed to mitigate the adverse impacts of this route and it was inconsistent with local government land use plans. NEPA requires that BLM consider mitigation measures to reduce the direct, indirect and cumulative impacts of the proposed action. 42 U.S.C. §4332(C)(ii); 40 C.F.R. 1502.14. The FEIS fails to consider methods to mitigate the impacts to private land uses or conflicts with local government plans. CLG asked BLM to consider burying the route segment of about eight miles. This mitigation was not even discussed even though it is the only way short of revising the route to mitigate these significant conflicts. See Protest of CLG at 10-11.	The FEIS includes extensive avoidance, minimization, and mitigation measures. See the summary in Table 2.7-1 as well as Appendix C, as well as numerous places in the FEIS. As noted above, remaining within the Wyoming Governor's sage-grouse corridor was a primary driver of the route in Wyoming. Routing through core habitat outside the Governor's corridor in order to avoid private land was not consistent with the Governor's executive order. The EIS addresses burying the transmission line in Section 2.6.3.1 of the FEIS. The additional costs and disturbance identified in that section would apply to an 8-mile section, as well as to a longer segment. While the BLM does not make decisions on permitting the line on private lands, it is continuing to work cooperatively with Lincoln County, the City of Cokeville, the Lincoln County Conservation District, and the State of Wyoming to find a route that meets everyone's needs.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	In addition, the FEIS fails to address the Lincoln County proposal to bury this short segment. FEIS, App. L-2. The CLG and Lincoln County comments submitted in November 2012 recommended burying the segment near the homes or revising the route. The FEIS record is	The EIS addresses burying the transmission line in Section 2.6.3.1 of the FEIS. The additional costs and disturbance identified in that section would apply to an 8-mile section, as well as to a longer segment. However, the BLM makes no decisions on

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		PRECEDING)	bereft of the comment, request for mitigation or BLM's response. NEPA also requires BLM respond to such comments, 40 C.F.R. §§1502.9(b), 1503.1, and the failure to do so is inconsistent with NEPA and FLPMA obligations to coordinate and resolve land use conflicts.	permitting the line on private lands. It would be up to the state and county to determine whether the line should be buried on private land near Cokeville, not the BLM.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	CLG sincerely hopes that BLM will write the Record of Decision to provide that the transmission line for Alternative 4 will be buried for the eight mile segment near Cokeville, Wyoming. If the project proponent objects to burying even this short portion of the line, then the route must be modified to avoid being within sight and sound of the residential areas.	The BLM ROD determines the route and the terms for building the line on federal lands. It would be up to the state and county to determine the permitting requirements on private lands, not the BLM. While the BLM recognizes that where it permits the line on federal land affects the location on adjacent private lands, it has no authority to require (or prohibit) burying the line on private lands. The BLM is continuing to work cooperatively with stakeholders in the Cokeville area to find a route that meets everyone's needs; see the report attached to the ROD.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	Finally, BLM justifies putting the transmission line next to homes to protect historic trail segments while failing to deal with the fact that the trail segments lack the necessary integrity.	The BLM recognizes that the county and the district have a different view on the integrity of some the trail segments than the BLM.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	The Land Use Plan Revisions Contradict FLPMA by Violating Local Land Use Plans Pursuant to FLPMA, BLM must ensure that "land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act." 43 U.S.C. §1712(c)(9) (emphasis added). Further, FLPMA requires BLM to coordinate with the land use planning and management programs of the States and local governments. Id. Because the majority of the land in Lincoln and Sweetwater County is federally owned, management of these lands directly impacts the economies, the customs and culture, and the health and safety of the citizens of Lincoln and Sweetwater County. Ex. 1, Lincoln County Plan at 3-4; Ex. 3, LCD Land Use and Natural Management Long Range Plan at 1; Ex. 2, Sweetwater County Plan at 8.1-8.3; Ex. 4, SWCCD Land and Resource Use Plan and Policy at 27 (2011). In order to enhance these values and provide for the general well-being of its citizens as well as respect private property rights, the Coalition and its members favored Alternative 4A, because it followed an existing transmission line corridor and minimized the adverse impacts to private land. Ex. 5, CLG Comments on Potential Alternative Routes at 4 (Sept. 4, 2009). As originally contemplated, this route would reduce surface disturbance and adverse impacts to the environment and private property. Most importantly, the proposed route reduces impacting private land values when feasible routes exist on public lands or existing utility corridors. This loss of property values primarily affects residences, which are citizens' primary assets. The Coalition has consistently requested that BLM minimize its impact on private lands	FLPMA requires that BLM coordinate with local governments in its planning actions; it does not require that federal lands be managed as directed by county plans. As the quote in the comment shows, FLPMA grants the Secretary the authority to determine when federal plans will be consistent with local plans. The BLM has coordinated with state and local governments throughout the project and will continue to do so.

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			<p>for federal projects. Ex. 5, CLG Comments on Potential Alternative Routes at 4; Ex. 6, CLG Comments on DEIS at 1-3, 9-11; Ex. 7, CLG Comments on FEIS. This protects the health and safety of its citizens, protects property values and the tax base of the counties, and minimizes impacts to the environment and wildlife, such as sage grouse. Ex. 1, Lincoln County Plan at 3-4 (objectives of the Lincoln County Public Lands Policy)); Ex. 3, LCD Land Use and Natural Management Long Range Plan at 1; Ex. 2, Sweetwater County Plan at 8.1-8.3; Ex. 4, SWCCD Land & Resource Use Plan & Policy at 19-20. Further, the Coalition members work with BLM to preserve private property rights and values for its citizens and minimize impacts by public land use decisions. See Ex. 1, at 3-10, 3-28; Ex. 2, at 2.5, 2.10, 8.1; Ex. 3, at 13; Ex. 4, at 19-23.</p> <p>The Coalition and its members recommended that the Gateway West Transmission Line follow the existing 345-kV transmission lines from Jim Bridger Power Plant for most of Segment 4. The Coalition, however, supported a revision in Segment 4 and stated that the route must avoid privately owned lands to the extent possible, whether it be private lands within the checkerboard or residential areas near Cokeville, WY. Instead, BLM deviated from the existing transmission line route near Cokeville, WY, with a preferred route that disproportionately affects residential and private lands. The proposed route deviates to the north from the existing transmission line route near Cokeville, WY by a distance much more than Coalition members anticipated. This deviation results in the transmission line running very close to residential areas. The revised route will also have greater surface disturbance and will adversely affect property values. Construction and operation will interfere with the landowners' peace and enjoyment of their homes, which in most cases, represents their most valuable asset.</p>	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>The adverse impacts on private lands are unnecessary, because the route could have been located away from residences. BLM failed to consider any effective mitigation measures proposed by the Coalition and its members, when it ignored the Coalition recommendations to bury the transmission line for a mere eight miles near Cokeville, Wyoming in order to be consistent with the county plan. Ex. 7, CLG Comments on FEIS at 2-4.</p> <p>Anticipating BLM hostility to the burial option and in consideration of the project proponent potentially rejecting the burying mitigation measure, the Coalition also suggested moving the line to the south of the existing route to again avoid adversely affecting the residential areas. Id. This proposed route also would be located south of the Lincoln Conservation District's proposed reservoirs identified during scoping. BLM failed to consider either the mitigation measure or the alternative route in violation of both FLPMA and NEPA. BLM only considered and rejected analyzing the technical and economic feasibility of burying</p>	<p>The BLM considered burying the line (see section 2.6.3.1 of the FEIS) as well as many other routing options (see Chapter 2). The BLM has worked cooperatively with the Lincoln County Conservation District and the state and counties to find a route that meets everyone's needs. Remaining within the Wyoming governor's sage-grouse corridor was a primary driver of the route in Wyoming. The Governor's executive order does not list avoiding private land as a justification for routing through core habitat outside a designated corridor. As required by the Governor's policy, the existing disturbance and the additional project disturbance cannot exceed 5 percent in a core area outside the designated corridors. A disturbance calculation was completed for the County's proposed reroute in July 2013. The existing disturbance was over 23 percent.</p>

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			the Gateway West Transmission Lines for the entire distance of the project, approximately 990 miles. See Gateway West FEIS, Sec.2.6.3.5, at 2-138 (admitting that burying lines is justifiable for limited distances, which is exactly what the Coalition proposed but BLM failed to analyze). The Coalition proposed burying the line for eight miles near Cokeville, Wyoming, or less than 1% of the total distance of the Gateway West Project. Ex. 7, at 1-6. The second alternative proposed by the Coalition would direct the Gateway West Transmission Line from the proposed route and connect with route alternative 4C south of Cokeville, WY. Ex. 7, CLG Comments on FEIS at 3-4. However, BLM failed to analyze or even respond to this alternative proposed by the Coalition in the FEIS comments even though the alternative was reasonable, technically and economically feasible, resulted in less impacts, and accomplished the intended purpose of the Gateway West Transmission Line Project. See Gateway West FEIS at App. L 189-93 (no response to the suggested route alternative); see also S. Utah Wilderness Alliance (SUWA), 182 IBLA 377, 391 (2012) (stating the standard for considering a proposed alternative). These mitigation measures and alternatives should have been considered and analyzed pursuant to FLPMA and NEPA.	In addition, placing the line on the south side of the three existing lines on federal land would impact cultural resources (refer to Section 3.3) as well as other resources that the BLM is required to consider.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	BLM justifies the deviation north of the existing transmission lines, which unnecessarily impacts private lands and residential areas, by stating that it provides a better crossing of U.S. Highway 30 and the Bear River and lessens impacts on wetlands. Gateway West FEIS at 2-43. However, BLM does not explain why these issues support contradicting the local government land use plans or diminishing land values so as to effect a partial taking. Nor does BLM address whether or how the project proponent will secure rights-of-way across the private lands. The omission of these issues renders the analysis of the FEIS deficient and also demonstrates that the proposed decision violates FLPMA's mandate that land use plans (and amendments) be consistent with those of local governments to the extent practical and consistent with federal law. 43 U.S.C. §1712(c)(9). No federal law directs that rights-of-way be granted on private lands rather than federal nor are the mitigation measures proposed by CLG impractical. Indeed they are quite practical.	As noted in Chapter 1, "The BLM has received ROW applications from the Proponents and must determine whether to allow the use of the National System of Public Lands for portions of Gateway West. In accordance with FLPMA and the BLM's ROW regulations, 43 CFR Part 2800, the BLM must manage public lands for multiple uses that take into account the long-term needs for future generations of renewable and non-renewable resources. The Secretary of the Interior is authorized to grant ROWs for "systems for generation, transmission, and distribution of electric energy" "over, upon, under, or through [public] lands" (43 U.S.C. § 1761(a)(5))." The BLM is not making a decision on whether or how the Proponents will acquire access across private lands; this is an issue for the State court. The BLM has no authority to require mitigation on private lands.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	The Coalition provided BLM with a reasonable mitigation measure for the preferred alternative and a reasonable alternative in its comments on the FEIS in order to be consistent with the county land use plan and to avoid harming residences and land values. See Ex. 7, CLG Comments on FEIS at 1-6. CLG's proposal would have reduced the environmental, social and economic impacts of the project on affected private lands and residences near Cokeville, WY and was feasible under the Coalition's proposed land use plan amendments. Id.	The suggested route is not consistent with the Governor's sage-grouse policy because it crosses core habitat outside the designated corridor. As required by the Governor's policy, the existing disturbance and the additional project disturbance cannot exceed 5 percent in a core area outside the designated corridors. A disturbance calculation was completed for the County's proposed reroute in July 2013. The existing disturbance was over 23 percent. Also, the BLM must consider the impacts to other resources as well as impacts to landowners.

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101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>BLM Failed to Follow NEPA Procedures</p> <p>Pursuant to the Council on Environmental Quality regulations, BLM must “rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.” 40 C.F.R. §1502.14. Further, BLM must “include appropriate mitigation measures not already included in the proposed action or alternatives.” Id. Finally, BLM has a duty to respond to all substantive comments as provided in 40 C.F.R. §1503.4, such as developing and evaluating alternatives not previously given serious consideration by the agency and at the very least explaining why certain comments do not warrant further agency response. See also 40 C.F.R. §1503.1 (includes responding to comments on the DEIS and comments sought by the agency on an FEIS prior to the actual decision being made). “A ‘rule of reason’ applies to both the range of alternatives that must be considered and the extent to which each alternative must be addressed.” SUWA, 182 IBLA at 390-91 (citing 40 C.F.R. §§1500.2(e), 1508.9(b); 516 DV 3.4(A); Headwaters, Inc. v. BLM, 914F.2d 1174, 1180-81 (9th Cir. 1990); Mo. Coalition for the Environment, 172 IBLA 226, 241 (2007)). “Appropriate alternatives are those that are reasonable alternatives to the proposed action, will accomplish its intended purpose, are technically and economically feasible, and yet have a lesser or no impact.” Id. (citing 40 C.F.R. §1500.2(e); WildEarth Guardians, 182 IBLA 100, 107 (2012); Or. Chapter Sierra Club, 176 IBLA 336, 351 (2009); Wilderness Workshop, 175 IBLA 124, 135 (2008); Biodiversity Conservation Alliance, 174 IBLA 1, 24-25 (2008)).</p> <p>1. Mitigation Measures Excluded</p> <p>NEPA requires that BLM mitigate the consequences of its actions. 40 C.F.R. §§1502.1, 1502.14(f), 1502.16(h), 1508.20. BLM must consider and analyze mitigation measures. 40 C.F.R. §1502.1 (the EIS “shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.”), 1502.14(f) (the alternatives section of the EIS “shall include appropriate mitigation measures not already included in the proposed action or alternatives.”), 1502.16(h), 1508.20. BLM’s failure to consider the local governments’ reasonable mitigation measure violates NEPA.</p> <p>In response to BLM’s proposed alternative route and consistent with County and Conservation District land use objectives, the Coalition proposed that Rocky Mountain Power bury the transmission line where it passes near the residential areas in Cokeville Wyoming in order to mitigate the impacts to private lands and residential areas. Ex. 7, Coalition Comments on FEIS at 2-4. BLM ignored this mitigation</p>	<p>The BLM has spent several years working with all parties and Chapter 2 of the FEIS documents that the BLM rigorously explored and objectively evaluated the proposed action and reasonable alternatives. See Section 2.4.12 for alternatives that were eliminated from detailed study and the reasons for their having been eliminated. The FEIS includes numerous mitigation measures (summarized in Table 2.7-1). The alternatives proposed by the County were not considered in detail because routing through core habitat outside the Governor’s corridor was not consistent with the Governor’s executive order. The FEIS addresses burying the transmission line in Section 2.6.3.1. The additional costs and disturbance identified in that section would apply to an 8-mile section, as well as to a longer segment. However, the BLM makes no decisions on permitting the line on private lands. It would be up to the state and county to determine whether the line should be buried on private land near Cokeville.</p>

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			<p>measure and undertook no mitigation measures that would make the project conform to the county zoning. Similarly, BLM also failed to consider or analyze the alternative route that would be south of the existing transmission line rather than north of it. FLPMA and NEPA require that BLM address these material issues and failure to do so violates FLPMA and NEPA.</p> <p>As mitigation, the Coalition proposed to bury the lines for eight miles near the residential areas of Cokeville, WY. Ex. 7, CLG Comments on FEIS at 1-4. BLM dismissed this route after only considering the economic and technical feasibility of burying the Gateway West Transmission Line along the entire route, which is not what the Coalition proposed at all. Gateway West FEIS, Sec. 2.6.3, at 2-169-2-138. Even the FEIS admits that burying transmission lines is economically and technically feasible for limited distances. Gateway West FEIS at 2-138. However, BLM never acknowledged either the short segment burial proposal.</p>	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>BLM Failed to Follow NEPA Procedures</p> <p>Pursuant to the Council on Environmental Quality regulations, BLM must “rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.” 40 C.F.R. §1502.14. Further, BLM must “include appropriate mitigation measures not already included in the proposed action or alternatives.” Id. Finally, BLM has a duty to respond to all substantive comments as provided in 40 C.F.R. §1503.4, such as developing and evaluating alternatives not previously given serious consideration by the agency and at the very least explaining why certain comments do not warrant further agency response. See also 40 C.F.R. §1503.1 (includes responding to comments on the DEIS and comments sought by the agency on an FEIS prior to the actual decision being made).</p> <p>“A ‘rule of reason’ applies to both the range of alternatives that must be considered and the extent to which each alternative must be addressed.” SUWA, 182 IBLA at 390-91 (citing 40 C.F.R. §§1500.2(e), 1508.9(b); 516 DV 3.4(A); Headwaters, Inc. v. BLM, 914F.2d 1174, 1180-81 (9th Cir. 1990); Mo. Coalition for the Environment, 172 IBLA 226, 241 (2007)). “Appropriate alternatives are those that are reasonable alternatives to the proposed action, will accomplish its intended purpose, are technically and economically feasible, and yet have a lesser or no impact.” Id. (citing 40 C.F.R. §1500.2(e); WildEarth Guardians, 182 IBLA 100, 107 (2012); Or. Chapter Sierra Club, 176 IBLA 336, 351 (2009); Wilderness Workshop, 175 IBLA 124, 135 (2008); Biodiversity Conservation Alliance, 174 IBLA 1, 24-25 (2008)).</p> <p>2. Failure to Consider Local Government Alternative</p> <p>BLM was equally dismissive of the Coalition’s proposed alternative</p>	<p>The BLM has spent several years working with all parties and Chapter 2 of the FEIS documents that the BLM rigorously explored and objectively evaluated the proposed action and reasonable alternatives. See Section 2.4.12 for alternatives which were eliminated from detailed study and the reasons for their having been eliminated. The FEIS includes numerous mitigation measures (summarized in Table 2.7-1). Routing through core habitat outside the Governor's corridor in order to avoid private land was not consistent with the Governor's executive order. Placing the line on the south side of the three existing lines on federal land would impact cultural resources (refer to Section 3.3) as well as other resources that the BLM is required to consider. The FEIS addresses burying the transmission line in Section 2.6.3.1. The additional costs and disturbance identified in that section would apply to an 8-mile section, as well as to a longer segment. However, the BLM makes no decisions on permitting the line on private lands. It would be up to the state and county to determine whether the line should be buried on private land near Cokeville.</p>

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			route to deviate the Gateway Transmission Line south of the existing transmission lines and connect with alternative route 4C. Gateway West FEIS at App. L 189-193. This route would only add a few miles of transmission line, would not impact private residential areas near Cokeville, WY, and would avoid proposed water storage reservoirs proposed by LCD. It would be less total distance than alternative routes 4B-4F. BLM completely failed to respond to this proposed alternative route. Id. The Coalition only proposed the mitigation of burying the transmission line for eight miles or the alternative route once it was apparent in the FEIS that BLM was planning on locating the Gateway West Transmission Line much further north of the existing 345-kV transmission lines than the rest of the proposed route. Ex. 7, CLG Comments on FEIS at 1-6. There is no adequate explanation to justify not considering the mitigation or alternative route. Mitigating the impacts on residences and ensuring the project is consistent with the county plan and is economically and technically feasible and meets the purpose and need of the proposed action. The revision of the route is equally feasible and only adds a few miles to the route. Therefore, pursuant to NEPA and CEQ regulations, the Coalition's mitigation measure or alternative route should have been considered, analyzed, and properly responded to by BLM. As is evident in the FEIS, BLM ignored these points.	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>BLM Must Adjust VRM Classifications to Reflect Underlying Land Uses</p> <p>Decision #6051 states that a visual corridor extending up to 1 mile on either side of the Sublette Cutoff and Slate Creek Cutoff would be designated through VRM Class II areas north of U.S. Highway 180 and east of Slate Creek Ridge in consideration of NHT views. Gateway West FEIS at App. F 1-10. The Coalition supports a reclassification to VRM Class III for all routes, including the preferred route located north and east of U.S. Highway 30 and west of the Hams Fork River. Ex. 6, at 7-8; Ex. 7 at 8.</p> <p>"The approved VRM objectives shall result from, and conform with, the resource allocation decisions made in the RMPs." BLM Manual 8400.0-6A.2. BLM cannot enforce a VRM Class II designation if it conflicts with the underlying resource allocation. As stated by the IBLA, BLM must expressly alter the VRM classification to the level which would be consistent with approved land use determinations. SUWA, 144 IBLA 70, 84 (1998).</p> <p>The objective of VRM Class II is to "retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape." BLM Manual H-8410-</p>	Please refer to Section 3.2 for a detailed discussion of how the VRM process was followed. Refer to Appendix G for a detailed analysis of scenery associated with plan amendments. Also see Appendix E (as well as G) for photo simulations showing the expected Project impacts.

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			<p>1.V.B.2. The existing 345- kV transmission lines running through the area north and east of U.S. Highway 30 do not comply with VRM Class II, nor will the Gateway West Transmission Line. Therefore, BLM must amend the VRM classifications to reflect the underlying resource designation of allowing transmission lines through this area, including crossing and in the vicinity of the Sublette Cutoff NHT. SUWA, 144 IBLA at 84-85; BLM Manual H-8410-1.I.A (“During the RMP process, the class boundaries are adjusted as necessary to reflect the resource allocation decisions made in the RMPs.”). Therefore, the plan amendments should adjust the VRM classifications to reflect the approval of the existing transmission lines as well as the Gateway West Transmission Line.</p> <p>BLM is complying with the Manuals and IBLA holdings by amending the Jarbidge RMP and the Bennett Hills/Timerman Hills MFP on preferred routes 8 and 9. See Gateway West FEIS at ES-6 (Table ES-2) (“The VRM Management decision and Map 9 are amended to accommodate a major powerline R/W. Approximately 5, 200 acres of VRM Class I associated with the Oregon Trail is reclassified to Class III.”); id. (“The area within the WWE Corridor will be reclassified as VRM III.”); id. (The VRM Class II area within 3,000 feet to the north of the existing transmission line ROW will be reclassified to VRM IIII (including the existing ROW.”). BLM must do the same in the Kemmerer RMP amendments.</p>	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>Historic Trail Criteria Are Not Valid Grounds to Deviate Transmission Line Onto Private Residential Areas near Coleville, Wyoming</p> <p>In the 2009 Omnibus Public Lands Act, Congress authorized a feasibility study of the Sublette Cutoff in consideration for part of the Oregon National Historic Trail, which has not gotten past scoping. No recommendations will be made for several years. More importantly as shown below several of the affected segments will not meet the National Park Service (NPS) criteria for protection and landowner consent is highly unlikely. Regardless of whether the Sublette Cutoff is included as part of the Oregon National Historic Trail or the California National Historic Trail, the route deviation the Coalition is concerned with is not based on any factual analysis of the segments and thus is arbitrary, because it preserves segments regardless of the extent to which such segments have lost all integrity and no longer qualify as an historic site. The fact that there is an existing power corridor, an airport, and residential subdivisions are all factors suggesting that any trail remnants are only that and the affected segments have lost all integrity.</p>	The BLM recognizes the County’s position on the suitability of these trail segments; however, the BLM has an obligation to protect historic trails until the integrity of the segments is determined. Refer to the Kemmerer RMP for a discussion of these trails and the protection required.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	<p>Decision #6054 BLM proposes Amendment #4 to Decision #6054, which provides, “Allow the Gateway West Project where it would otherwise be in conflict with the historic viewshed preservation management actions. Micrositing and mitigation measures will be implemented to minimize visual impacts to affected historic sites and</p>	The BLM recognizes the County’s position on the suitability of these trail segments; however, the BLM has an obligation to protect historic trails until the integrity of the segments is determined. Please refer to Appendix F-1 and Appendix G-1 for the analysis of the effects on scenery in this area. Also see

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			<p>trail segments.” Gateway FEIS at App. F 1-17. Otherwise, BLM must preserve the viewshed within 3 miles of Class 1 NHT segments within the Tunp/Dempsey area and 1 mile outside of the Tunp/Dempsey area. Id. at App. F 1-10-1-11. BLM must also preserve the existing character of the landscape of Class 2 trail segments north of Highway 30. Id.</p> <p>Segments of the Sublette Cutoff are located just south of Cokeville along the existing transmission line. This is the same location where the Coalition proposed its alternative to the proposed route.</p> <p>Representatives of Coalition members personally walked the entire length of the Sublette Cutoff near Cokeville, Wyoming and found that almost the entire length of the Trail is no longer visible and has lost its historic integrity. If properly analyzed pursuant to the NHT, NHPA, and VRM guidelines, BLM should not have ignored the Coalition’s alternative route based on the location of this trail.</p> <p>The Coalition objects to the classification of the trail segments near the existing transmission lines as Class 1 or 2, because most have lost their physical integrity and do not qualify for protection under NHPA. See How to Apply the National Register Criteria for Evaluation, National Register Bulletin 51, at 44-47 (1995) (When roads or trails are mostly invisible or difficult to follow, then they have not retained the essential physical features necessary to meet the criteria for integrity.). Nor are these segments appropriate for NHT designation based on the NPS criteria.</p> <p>For National Historic Trails, the management corridor need not be continuous through the planning area. A National Historic Trail Management Corridor will include Federal Protection Components, including the high potential historic sites and high potential route segments identified in the trailwide Comprehensive Plan. The corridor will include those areas that meet the criteria established in the NTSA; the designated route that contains evidence of history, including artifacts and remnants; National Register eligible and/or listed properties; and proposed supporting development actions or uses, such as access trails, overlooks, and interpretive sites.</p> <p>Ex. 9, BLM Manual 6280, Sec. 4.2., D.2.iv; see also How to Apply the National Register Criteria for Evaluation, National Register Bulletin 51, at 44-47 (1995). Indeed, the California Trail Comprehensive Management and Use Plan FEIS shows that there are no high potential trail segments or high potential sites located in the immediate vicinity of the Coalition’s proposals. Ex. 10, at 14, 233, 273.</p> <p>Therefore, the Coalition recommends that BLM reclassify the relevant viewshed classifications to Class III segments within the portion of the planning area south of Cokeville, WY. In response to the Coalition’s comment that BLM should not even consider historic trail segments which no longer have any physical evidence of the trail, BLM</p>	Sections 3.2 and 3.3.

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			responded that it “does consider that these trails could be eligible for listing on the National Register of Historic Places until studies show otherwise.” Gateway West FEIS at App. L 193. As explained above, the CLG information demonstrated BLM cannot assume eligibility when the trail has lost its physical integrity. The assumption of eligibility is contrary to regulations and policy. See How to Apply the National Register Criteria for Evaluation, National Register Bulletin 51 at 44-47 (1995).	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	Pursuant to NEPA and CEQ regulations, BLM must explain why burying the lines or rerouting the lines south to alternative route 4C as proposed by the Coalition in its FEIS comments would not alleviate these supposed issues. There is no reason this route could not have been considered, unless BLM was relying on a misapplication of its NHT policy.	Please refer to Section 2.6.3 for an analysis of underground alternatives. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	Decision #5010 BLM proposed to permit a one-time allowance for the Gateway West project to cross the Sublette Cutoff in Section 11 of T23N, R118W. Gateway West at App. F 1-15. According to BLM policy, BLM cannot permit a one-time violation of the VRM class for this portion of the proposed transmission line route, because it is a permanent structure that alters the context and historic values, to the extent that they exist anymore. See NHPA rules, 36 C.F.R. part 800 (construed to protect specific trail features and their associated historic landscape); E.O. 13195, “Trails for America in the 21st Century, 66 Fed. Reg. 7391 (2001) (requiring federal agencies to ensure trail corridors are protected and that trail values remain intact); BLM IM No. WY-2002-001. Instead, the Coalition proposes the BLM amend Decision #5010 to state, “Manage the viewshed to preserve the existing character of the landscape within the federal sections where physical evidence of the trail occurs (routes and traces, grades, campsites, landmarks).” See Ex. 6, CLG Comments on DEIS at 6-7; Ex. 7, CLG Comments at 6-7. Because much of these trail segments cross private land, the NHTA requires landowner and local government involvement and cooperation in protecting those segments. 16 U.S.C. §1244(b). This has not occurred and no landowner has consented to designation. Further, the CLG proposed amendment takes into account the need to establish the physical integrity of the trail segment before concluding that it is eligible for protection under the National Historic Register. See How to Apply the National Register Criteria for Evaluation, National Register Bulletin 51 at 44-47 (1995). For instance, even if a trail can be seen, if it is made by mechanical tire tracks or has been bladed and graded, it no longer qualifies as an historical trail. Id. Therefore, the project need not be relocated or further land use plan amendments be necessary for this project or future projects based on historic trails which no longer exhibit any physical characteristics required for protection.	It is within the BLM's authority to approve an amendment allowing with a one-time allowance or one that changes the VRM class. The Kemmerer Field Office determined that a one-time allowance would be appropriate in this location for the Gateway West Project.

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			If BLM had accepted the Coalition's proposed amendment of Decision #5010, the Gateway West Transmission Line could run along the Coalition's proposed alternative route deviating south of the existing transmission lines without interfering with residential areas near Cokeville, WY and connecting with route alternative 4C. BLM must provide an explanation for not analyzing the Coalition's proposed route and not abiding by the National Park Service's guidelines for National Historic Trails.	
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	Finally a one-time allowance as proposed in Decision #5010 by BLM would be rendered moot if BLM simply designated a 1-mile wide utility corridor centered on the existing 345-kV transmission lines. Further, BLM would not need to change VRM classifications or NHT viewsheds. Not only would this address trail issues, but also prevent infringements upon residential areas near Cokeville, WY and benefit future transmission line proposals. In response to this comment by the Coalition, BLM responded that "utility corridors are not designated where they are in conflict with NHT's management objectives." Gateway West FEIS at App. L 193. This shows that BLM is basing its current routes near Cokeville, WY on the location of historic trails without determining whether the trail segments exhibit the physical integrity to be protected and whose setting are already compromised by the existing 345-kV transmission lines.	Noted. The BLM does not agree that designating a 1-mile wide utility corridor in the location is appropriate.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	A 1-Mile Wide Utility Corridor should have been Considered by BLM to Address Future Projects and Render Moot One-Time Allowances for Crossing NHTs, Viewsheds of NHT Segments, and VRM Class II Areas. The BLM proposed Decision #6008 should be amended to designate a 1-mile wide utility corridor generally centered on the Gateway West Transmission Line if either routes 4B or 4D were selected. Gateway West DEIS at App. F 1-21. The current language of Decision #6008 states that "utility corridors are not designated, where they are in conflict with NHT's management objectives." Id. The Coalition supported creating a 1-mile utility corridor for all route alternatives, not just routes 4B and 4D. Ex. 6 at 7. However, because alternative routes 4B and 4D were not selected as the preferred alternative in the FEIS, BLM removed the amendment to Decision #6008. Gateway West FEIS at App. L 193. This response completely ignores the suggestion by the Coalition that a 1-mile corridor be considered for all alternatives, including the preferred alternative or its proposed alternative connecting with route 4C south of Cokeville, WY, as a means to resolve issues with crossing NHTs and their accompanying viewshed and VRM classifications. Ex. 6 at 7; Ex. 7 at 7. Once again, BLM failed to consider and respond to a reasonable alternative and mitigation method proposed by the Coalition.	The comment is correct in stating that a one-mile utility corridor on each side of the line was considered if either Alternatives 4B or 4D was selected but not for other routes. It is within the authority of the BLM to consider, or not consider (as well as to approve or not approve), utility corridors when proposing plan amendments.

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101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	At least two future transmission lines are currently being proposed (TransCanada and Zephyr) and a utility corridor will create an existing route for these projects. Id. If a utility corridor along the preferred route is created, the Coalition still supports mitigating the impact on private and residential properties near Cokeville, WY by burying the lines for eight miles. A utility corridor does not permit BLM to unnecessarily impact private and residential property to avoid public lands or NHTs. S. Utah Wilderness Alliance (SUWA), 182 IBLA 377, 391 (2012); see supra Sec. D at 10.	Based on the recently released DEIS for TransWest Express, the project would not cross Lincoln County. It crosses Sweetwater County near the eastern edge of the county. Zephyr has not begun the NEPA process but it is expected to closely follow the TransWest line. The BLM's recently released preferred route for Gateway South, this route also does not cross the County.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	Based on the foregoing, the Coalition, on behalf of its respective members, requests that the BLM Director set aside and remand BLM's Proposed Land Use Plan Amendments as stated in Appendix F of the FEIS for the Gateway West Transmission Line Project and: (1) Supplement the FEIS to add the burial of the transmission line as it passes near Cokeville Wyoming residences; or in the alternative (2) Supplement the FEIS to move the affected segments south of the existing line. (3) Adjust the VRM Classifications to reflect the underlying land use resource allocations. (4) Manage NHTs to only protect those segments which currently exhibit physical characteristics of an historic trail. (5) Create a 1-Mile Utility Corridor on whichever route is chosen to resolve issues of NHTs, NHT Viewsheds, and VRMs for the Gateway West project and other future transmission line projects.	Please refer to the BLM's official response to the Coalition's protests (Appendix K to the ROD).
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	The revised location of the transmission line directly contradicts the Lincoln County land use plan and also conflicts with local zoning laws. Notwithstanding BLM's mandate that it coordinate and resolve such conflicts, BLM has ignored this issue and proceeded to place the transmission line nearly overhead of residential homes, yards, and adjacent barns and other buildings, at a distance of less than 250 feet away, with resulting loss of value. Depending on the exact final location, the transmission line may even enter the town limits of Cokeville, Wyoming.	The Conservation District, as well as Lincoln County and the State, commented on the DEIS that the BLM should select Alternative 4A, the route that follows the existing Bridger lines, and drop the original proposed route. The Proponents dropped the original route and adopted Alternative 4A as the new Proposed Route (see Section 1.1.1 of the FEIS). Maps in the DEIS show the location of Alternative 4A and the route is described in Chapter 2 of the DEIS. The BLM agreed with the State and local recommendation to adopt 4A (now the Proposed Route) as the Preferred Route. The BLM has continued to work with the State and local governments to resolve issues near Cokeville.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	The location and mitigation or lack of mitigation for the preferred alternative analyzed in the Land Use Plan Amendments adversely and directly affect Lincoln County. The preferred alternative will reduce land values and county tax receipts due to the fact that it will be constructed near residential areas in Cokeville Wyoming.	Final placement of the line on private lands, as well as mitigation required on private lands beyond what is identified in the FEIS, is up to the state and local governments. Effects on property values is discussed in Section 3.4.2.2. This discussion focuses on property crossed by the transmission line. However, one study found that properties within 50 feet of a transmission line have property values that are 6 percent to 9 percent lower than the values of comparable properties. It also found that this reduction

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				in value tends to decrease over time. A recent study in Montreal found that direct views of a transmission line tend to reduce residential property value by roughly 10 percent (Des Rosiers 2002). Other studies found lower effects on property values.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	BLM made a choice to sacrifice land values of citizens of Lincoln County for the ostensible reason of not placing the transmission line on public lands due to alleged conflicts with now invisible segments of the Sublette Cutoff trail.	Sage-grouse and historic resources were key resources considered in identifying the Preferred Route in this area. Refer to Sections 3.11 and 3.3, respectively, for the analysis. Refer to Section 2.4.1.1 for a discussion of why the Preferred Route was selected.
101009	KENT CONNELLY	LINCOLN CONSERVATION DISTRICT (WY), ET AL. (SEE PRECEDING)	BLM failed to follow NEPA procedures by not considering mitigation measures proposed by CLG members and by ignoring a proposed alternative route that would have mitigated the adverse impacts and avoided contradictions with the local land use plans.	The BLM followed NEPA procedures as well as other pertinent the laws and regulations in preparing this FEIS. Mitigation requirements on private lands beyond what is identified in the FEIS are up to the state and local governments. As noted above, the BLM has no authority to require mitigation on private lands.
101011	NANCY J. THOMSON, J. BRENT THOMSON	BRENT THOMSON FAMILY TRUST	We are the owners of the Brent Thomson Family Trust and are concerned about the effect of the Gateway West Project on the value of three parcels of land in Ada County (#S2008314900, # S2008320000, and #S2017212125). Initially it was our understanding that the proposed power line would pass South of our Property, through the BLM property, just inside the Morley Nelson Snake River Birds of Prey area. We were surprised and disappointed to learn that the BLM preferred corridor, which is two miles wide, includes all three of our parcels of property.	Refer to Section 2.4.1.1 for a discussion of why the Preferred Route generally avoids crossing through the NCA.
101011	NANCY J. THOMSON, J. BRENT THOMSON	BRENT THOMSON FAMILY TRUST	We prefer the Idaho Power and Rocky Mountain Power Route which was proposed. We understand the reluctance to locate the power line in the Birds of Prey Area, however we believe that it can be designed and constructed to minimize the impact to the raptors. The impact of the power line seems to be minimal relative to the fatalities caused by the Windmills being built to generate the power for the line.	Your support for the Proponents' Proposed Route is noted.
101011	NANCY J. THOMSON, J. BRENT THOMSON	BRENT THOMSON FAMILY TRUST	It is our understanding that the Windmill Power is being subsidized by the taxpayer and the law requires the power companies to buy the power in spite of its higher cost and lack of 24 hour availability. As a consequence, we expect that the power costs will be increased significantly.	Analyzing the costs associated with wind energy is beyond the scope of this analysis.
101011	NANCY J. THOMSON, J. BRENT THOMSON	BRENT THOMSON FAMILY TRUST	We hope you will revise it so that the power line route conforms to the proposed Idaho Power and Rocky Mountain Power Route.	Your support for the Proponents' Proposed Route is noted.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Fundamentally the Southern WWE Corridor Alternative tracks along I-80 into the Utah and then tracks north through the heavily developed Wasatch Front area to reconnect with the proposed Gateway West corridor in Idaho. I-80 is the appropriate corridor for the Gateway West project to follow, not the more northern route near Kemmerer. This is recognized in the Kemmerer RMP, which designates a high voltage	Your support for the alternative that follows I-80 is noted. The reasons that the I-80 route was eliminated from detailed study are explained in section 2.4.12.4 of the FEIS. This route is 266 miles long, 136 more miles on private land than the Preferred Route. The Southern WWE Corridor Alternative (as it was called in the EIS) crosses densely populated portions of the Salt Lake Valley.

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			corridor along I-80 and certainly not in the more northern area that the current preferred alternative would intrude into. (See Kemmerer RMP Record of Decision at Map 13) This routing has the advantage of avoiding the significant special management areas provided for in the Kemmerer RMP, such as the Raymond Mountain and Rock Creek/Tunp areas, as well as the protected visual environments and the National Historic Trail Corridors. (See Kemmerer RMP Record of Decision at Maps 19, 20, and 21) This route would also probably totally avoid sage-grouse core areas. (See FEIS at Figure 3.11-1). The BLM rejects this routing choice from detailed consideration because it claims there are five problems with the route. In turn, these problems are, and the reasons they are not valid reasons to eliminate the route from consideration include: 2. BLM points out that this route is 64 miles longer than the proposed route. But as was true with the Shirley Basin segment, this is a minor and even trivial difference in a 1000 mile long transmission line. This should not be used as the basis for rejecting the Southern WWE Corridor Alternative where environmental impacts would be greatly reduced compared to the preferred alternative. Construction and related cost will be amortized over many decades of service and in this context become even more trivial in terms of costs. On the other hand, additional maintenance and repair cost for the 64 mile stretch will, over the decades, represent an insignificant cost and one paid for by the end consumer. Costs cannot be cited as a disqualifier for this alternative.	In addition, it does not access the Populus or Borah Substations. Accessing these substations would require many more miles of new transmission line, resulting in even more disturbance than the Preferred Route.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Fundamentally the Southern WWE Corridor Alternative tracks along I-80 into the Utah and then tracks north through the heavily developed Wasatch Front area to reconnect with the proposed Gateway West corridor in Idaho. I-80 is the appropriate corridor for the Gateway West project to follow, not the more northern route near Kemmerer. This is recognized in the Kemmerer RMP, which designates a high voltage corridor along I-80 and certainly not in the more northern area that the current preferred alternative would intrude into. (See Kemmerer RMP Record of Decision at Map 13) This routing has the advantage of avoiding the significant special management areas provided for in the Kemmerer RMP, such as the Raymond Mountain and Rock Creek/Tunp areas, as well as the protected visual environments and the National Historic Trail Corridors. (See Kemmerer RMP Record of Decision at Maps 19, 20, and 21) This route would also probably totally avoid sage-grouse core areas. (See FEIS at Figure 3.11-1). The BLM rejects this routing choice from detailed consideration because it claims there are five problems with the route. In turn, these problems are, and the reasons they are not valid reasons to eliminate the route from consideration include: 3. BLM claims this route will cross 136 miles more of private land than the proposed route. The significance of this as a preclusive factor needs to be elaborated on. From BLM's	Your support for the alternative that follows I-80 is noted. The reasons that it was eliminated from detailed study are discussed in Section 2.4.12 of the FEIS. The Southern WWE Corridor Alternative (as it was called in the EIS) crosses densely populated portions of the Salt Lake Valley. In addition, it does not access the Populus or Borah Substations. Accessing these substations would require many more miles of new transmission line, resulting in even more disturbance than the Preferred Route. We do not find increased overall disturbance to public and private lands to be consistent with advancing the public interest.

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			<p>perspective, it is not clear this is a detriment at all. Reducing impacts to the public lands should be BLM's goal and fundamental objective. This maximizes advancing the public interest, as BLM is required to do.</p> <p>While we recognize this project will have to involve considerable cooperation and collaboration among different entities, it is not clear that having 136 more miles of this project on private lands is necessarily so significant that more of the project needs to be built on the public lands. For example, along the Wasatch Front portion of this route, where most of the land is probably private, it could well be there are number of existing power lines than can be used for corridors (According to the FEIS, the rout will "then [go] west into Utah, following existing transmission lines over the Wasatch Mountain Range and into the Salt Lake Valley north of Ogden, Utah. The alternative would then turn north for approximately 45 miles, paralleling existing transmission lines on the east side of I-15." (FEIS at 2-91). If increased construction on private lands is accompanied by following existing powerline corridors, that does not seem undesirable.</p>	
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	<p>Fundamentally the Southern WWE Corridor Alternative tracks along I-80 into the Utah and then tracks north through the heavily developed Wasatch Front area to reconnect with the proposed Gateway West corridor in Idaho. I-80 is the appropriate corridor for the Gateway West project to follow, not the more northern route near Kemmerer. This is recognized in the Kemmerer RMP, which designates a high voltage corridor along I-80 and certainly not in the more northern area that the current preferred alternative would intrude into. (See Kemmerer RMP Record of Decision at Map 13) This routing has the advantage of avoiding the significant special management areas provided for in the Kemmerer RMP, such as the Raymond Mountain and Rock Creek/Tunp areas, as well as the protected visual environments and the National Historic Trail Corridors. (See Kemmerer RMP Record of Decision at Maps 19, 20, and 21) This route would also probably totally avoid sage-grouse core areas. (See FEIS at Figure 3.11-1)</p> <p>The BLM rejects this routing choice from detailed consideration because it claims there are five problems with the route. In turn, these problems are, and the reasons they are not valid reasons to eliminate the route from consideration include:</p> <p>4. The BLM then states this route will lead to 131 more miles in Utah "including densely populated portions of the Salt Lake Valley." It is not at all clear why this should preclude choice of this route. In fact, installing this mammoth industrial scale project in a densely populated area would seem to make more sense than building it in remote, environmentally sensitive areas, that are nominally supposed to receive protection to preserve these values, unlike most densely populated areas.</p>	Your support for the alternative that follows I-80 is noted. The reasons that it was eliminated from detailed study are discussed in Section 2.4.12 of the FEIS.

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101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Fundamentally the Southern WWE Corridor Alternative tracks along I-80 into the Utah and then tracks north through the heavily developed Wasatch Front area to reconnect with the proposed Gateway West corridor in Idaho. I-80 is the appropriate corridor for the Gateway West project to follow, not the more northern route near Kemmerer. This is recognized in the Kemmerer RMP, which designates a high voltage corridor along I-80 and certainly not in the more northern area that the current preferred alternative would intrude into. (See Kemmerer RMP Record of Decision at Map 13) This routing has the advantage of avoiding the significant special management areas provided for in the Kemmerer RMP, such as the Raymond Mountain and Rock Creek/Tunp areas, as well as the protected visual environments and the National Historic Trail Corridors. (See Kemmerer RMP Record of Decision at Maps 19, 20, and 21) This route would also probably totally avoid sage-grouse core areas. (See FEIS at Figure 3.11-1) The BLM rejects this routing choice from detailed consideration because it claims there are five problems with the route. In turn, these problems are, and the reasons they are not valid reasons to eliminate the route from consideration include: 5. And last, the BLM attempts to negate the benefit of this route following the WWE to a greater degree, saying that the increased length of this route negates the benefit of following the WWE. We have discussed the insignificance of the increased route length above, and maximizing the use of the WWE should clearly be a priority in route selection	Your support for the alternative that follows I-80 is noted. The reasons that it was eliminated from detailed study are discussed in Section 2.4.12 of the FEIS.
101012	BRUCE PENDERY,DUANE SHORT,JULIA STUBLE	WYOMING OUTDOOR COUNCIL,BIODIV ERSITY CONSERVATION ALLIANCE	All in all, it is clear the Southern WWE Corridor Alternative should be chosen as the preferred route for the Gateway West Transmission line in western Wyoming. This is the best way to avoid the substantial environmental impacts that will accompany BLMs' current preferred alternative in the Kemmerer area.	Your support for the alternative that follows I-80 is noted. The reasons that it was eliminated from detailed study are discussed in Section 2.4.12 of the FEIS.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	The existing transmission line corridor between Kemmerer and Bear Lake also deserves greater analysis as an alternative route for Gateway West. It appears that this corridor route, running west to west-north-west from Kemmerer to Bear Lake (starting just west of Kemmerer, running south of Fossil Butte National Monument, then crossing U.S. 30 near Cokeville, and then running northwest to Bear Lake) was not fully considered in the FEIS. (See FEIS Figure A-5). This route may not have any environmental advantages over the current preferred alternative or any of the feasible alternative routes. But then again, it could. The BLM should at least consider whether this is true, and if this route has fewer adverse environmental impacts it might be chosen. Again, it does not appear that BLM has previously considered this route; it certainly is not shown as a feasible alternative. Failure to consider a viable, practical alternative is a significant flaw in a NEPA analysis.	Constructing a 500 kV transmission line across the wetlands in the Bear Lake National Wildlife Refuge was not considered a reasonable alternative.

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101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	The third routing alternative that deserves greater analysis in the Kemmerer area is the existing transmission line corridor that runs from the Naughton Power Plant southwest into Uinta County, WY and then into Rich County, Utah. This route is also shown on Figure A-5 in the FEIS. It too does not appear to have been considered in detail at all in the FEIS. It appears to us this route should be considered. It would likely greatly reduce the environmental impacts relative to the preferred alternative now under consideration. It appears to us this route would be a natural extension of the 4B,C, D, E Feasible Alternative route that is shown in Figure A-5. In all likelihood, this route would have less impact on National Historic Trails and visually sensitive areas than the preferred alternative will have. It would generally avoid specially designated areas, it appears. For that reason this route should be carefully considered as an option. While this route also crosses a sage-grouse core area, it does not appear to us this route would have any greater impacts than the preferred alternative, which also crosses this core area. The BLM may tend to reject this route for some of the same reasons addressed above in the discussion of the Southern WWE Corridor Alternative. We have already discussed why those claimed detriments are not persuasive.	NEPA does not require an analysis of all conceivable routes. NEPA requires a reasonable range of alternatives be analyzed. Many routes were considered for Segment 4: eight were analyzed in detail and nine were eliminated from detailed study.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	The above options for route choices for the Gateway West transmission line, one in the Shirley Basin and three in the Kemmerer area, are practical and viable and therefore must be fully considered. An EIS must “[r]igorously explore and objectively evaluate all reasonable alternatives.” 40 C.F.R. § 1502.14(a). All of these routes would follow an existing power line or were at least peripherally considered by the BLM already, so there is no doubt regarding their reasonableness. We have explained in some detail above why these alternatives are reasonable, especially relative to BLM’s preferred alternative. Therefore, the BLM must fully consider them. The alternatives section of an EIS “is the heart of the environmental impact statement.” Id. § 1502.14. If these alternatives are not fully considered, this requirement will not be met for the Gateway West FEIS.	NEPA does not require an analysis of all conceivable routes. NEPA requires a reasonable range of alternatives be analyzed. Many routes were considered for Segment 1 and 4. Refer to Section 2.4 for a discussion of these routes, including those eliminated from detailed study.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	IV. Supplemental Environmental Impact statement Given that we are at the final EIS stage of this NEPA process, it may be necessary for BLM to issue a supplemental EIS so as to evaluate these routing alternatives for both eastern and western Wyoming, as well as to fully develop the necessary cumulative impact analysis and better implement the Purpose and Need statement into the EIS. Among other things, agencies may prepare a supplemental EIS “when the agency determines that the purposes of the Act will be furthered by doing so.” 40 C.F.R. § 1502.9(c)(2). This would seem to clearly be the case here—preparing a supplemental EIS so as to fully consider the alternatives we have highlighted and analyze cumulative impacts would advance the purposes of NEPA. Therefore a supplemental EIS should	NEPA does not require an analysis of all conceivable routes. NEPA requires a reasonable range of alternatives be analyzed. Numerous routes were considered for the Project. Refer to Section 2.4 for a discussion of these routes, including those eliminated from detailed study. The Gateway West analysis took place over several years, and the BLM believes that it took a very hard look at all reasonable routes and their advantages and disadvantages.

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			<p>be prepared. Policies of NEPA are to “foster and promote the general welfare” and to “create and maintain conditions under which man and nature can exist in productive harmony.” 42 U.S.C. § 4331(a). The government is to “use all practicable means and measures” to achieve these policies. Id. In addition, all practicable means are to be used to the end that six environmental protection objectives can be achieved. Id. § 4331(b)(1)-(6). To achieve these policy goals, a supplemental EIS should be issued for the Gateway West project that more fully considers a wider range of routing options.</p> <p>Considering a supplemental EIS for the Gateway West, because of the inadequacies of this FEIS, is also relevant given the similarities between this project and the Ruby Pipeline, which is also undergoing supplemental analysis. The BLM is preparing a draft supplemental EIS for the Ruby Pipeline project (which starts in Wyoming at Opal and follows a route that is roughly similar to the Gateway West route west into Utah and Nevada) as result of litigation ordering it to do so. The purpose of this draft SEIS will be to develop sufficient quantitative information and detailed data about cumulative impacts to sagebrush steppe vegetation and habitat. The SEIS will provide information about the original and past condition of the sagebrush steppe habitat and analyze cumulative impacts. It could lead to new terms and conditions for the Ruby Pipeline project.</p>	
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	<p>Considering a supplemental EIS for the Gateway West, because of the inadequacies of this FEIS, is also relevant given the similarities between this project and the Ruby Pipeline, which is also undergoing supplemental analysis. The BLM is preparing a draft supplemental EIS for the Ruby Pipeline project (which starts in Wyoming at Opal and follows a route that is roughly similar to the Gateway West route west into Utah and Nevada) as result of litigation ordering it to do so. The purpose of this draft SEIS will be to develop sufficient quantitative information and detailed data about cumulative impacts to sagebrush steppe vegetation and habitat. The SEIS will provide information about the original and past condition of the sagebrush steppe habitat and analyze cumulative impacts. It could lead to new terms and conditions for the Ruby Pipeline project.</p> <p>The BLM should fully consider this SEIS at it moves toward approval of the Gateway West project. This information could be highly relevant to the Gateway West project, which also traverses large areas of sagebrush steppe habitat. The Ruby Pipeline terms and conditions might be just as relevant (perhaps in a modified way) to the Gateway West project, and the BLM should carefully consider whether to include these terms and conditions as components of this project in its Gateway West record of decision.</p>	We see no reason to require a supplemental EIS at this point given the extensive, detailed analysis presented in the FEIS.
101012	BRUCE PENDERY,	WYOMING OUTDOOR	There is an additional reason to consider a supplemental EIS: in BLM’s efforts to comply with the Wyoming Executive Order 2011-5, the	Avoiding effects on historic trails and historic sites in the Kemmerer area was a major factor in identifying the Preferred

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	DUANE SHORT, JULIA STUBLE	COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	<p>agency is in danger of not fulfilling its multiple use mandate. While we strongly support efforts to ensure sage- grouse conservation, we believe there is some danger in BLM's apparent almost single-minded focus on compliance with this Executive Order. It appears the BLM is giving compliance with the EO more weight—much more weight—than any other multiple use concern. This is especially apparent in the Kemmerer area where BLM seems mostly intent on ensuring compliance with the EO and has far less concern about compliance with RMP provisions intended to protect historic trails, visually sensitive areas, and special management areas. BLM seems more than willing to weaken RMP provisions if they stand in the way of Gateway West approval, but it will not even dream of not complying with the EO.</p> <p>This logic is contrary to BLM's multiple use mandate, as stated in the purpose and need statement for this project. The BLM should ensure that all multiple uses are receiving equivalent consideration and are valued similarly. A National Historic Trail is just as valuable and has just as much legal protection as does a sage chicken. This should be reflected in BLM's decision-making, which is not currently the case. BLM should be no more willing to violate the current provisions of its RMPs than it is to violate the sage-grouse EO. Accordingly, we ask the BLM to reconsider all decisions being made in the FEIS and ensure that all multiple use values are given equivalent levels of consideration and where the values are significant, equivalent levels of protection. No one resource value should trump all other resource values.</p>	Route, along with protecting sage-grouse and other multiple use considerations. Refer to Section 2.4.1.1 for a discussion of the preferred alternative.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	<p>Often, there is reticence on the part of the BLM and all stakeholders to undergo the processes necessary for additional analysis. While we deny that this is not a valid reason to not complete an SEIS to address the FEIS' shortcomings for a variety of reasons, we would also like to note that there is no rush to complete Gateway West, even from the Proponents' perspective. In early June 2013, one of the Gateway project proponents (Rocky Mountain Power) told media that, because of the Environmental Protection Agency's new rules on regional haze, "Many of the company's coal-fueled generating plants in Wyoming may face early shut-down," (Casper Star-Tribune, June 6, 2013). The company owns four coal-powered plants, one of which—the Dave Johnston—is the origin point for Gateway West. If the company is considering shutting down this power plant, there is no need to consider a ROW grant application. While proponents argue there may be other electrons they can feed onto Gateway West after completion, these are not currently available, thus, their generation (wind farms in the Shirley Basin, we fear) must be considered as a cumulative impact of this project. Once again, the incomplete cumulative impact analysis is, by itself, a reason to complete another SEIS and if Rocky Mountain Power is considering shutting down the plant that would provide energy to the Gateway West line there is no need to rush this analysis.</p>	After years of analysis and working with stakeholders across the two states, we believe the Gateway West Project has been thoroughly analyzed and see little that could be gained by redoing the analysis in a supplemental EIS.

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			The most recent news regarding President Barack Obama's additional regulations on existing power plants (New York Times, June 13 2013 and New York Times June 25, 2013) to limit carbon dioxide emissions will also have sweeping impacts on coal-fired power plants, like the one that would feed energy into the Gateway West line. While the Proponents may want to receive ROW approval and build this line as soon as possible, it is not in the BLM's or the public's interest to rush approval, especially in light of incomplete analysis. Arguably, if coal-fired power plants become less viable because of environmental regulations, the Proponents will desire a transmission line, like Gateway West, to transmit energy from renewable sources, like wind. But as we have stated many times, this cumulative impact is not adequately analyzed in this FEIS and deserves supplemental analysis for the BLM to complete its multiple use mandate and comply with NEPA regulations regarding complete analysis.	
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	In conclusion, we are grateful for the ability to provide comments on this plan and to the BLM for the extensive effort already invested in this FEIS. However, we find it is incomplete and that there is standing for the agency to complete another SEIS in order to do it its due diligence regarding environmental impact analysis for the Gateway West line. We believe the BLM's multiple use mandate, through its Purpose and Need must be better implemented and considered during alternative development, that the cumulative impact analysis is inadequate, and that several routing alternatives in eastern and western Wyoming deserve further analysis. We urge the BLM to address these shortcomings by completing a supplemental environmental analysis.	The FEIS documents an extensive and detailed analysis of the proposed and alternative routes. It includes numerous avoidance, minimization, and mitigation measures, including additional off-site compensatory mitigation which has been included in the ROD. We do not agree that the analysis is inadequate or that a supplemental EIS is required.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Please accept these comments from the Wyoming Outdoor Council regarding the final environmental impact analysis for the Gateway West Transmission Line Project. We appreciate the ability to further comment on the Bureau of Land Management's environmental analysis for this project. We have previously submitted three sets of comments regarding this project: two on the draft environmental impact statement and dated October 28, 2011 and one set on the supplemental environmental impact analysis, dated August 3, 2012. These three sets of comments are hereby enjoined to these by this reference.	Noted.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	We have previously focused our comments on the Gateway West project on the proposed routes and impacts to viewsheds, wildlife habitats, cultural resources. We continue to be concerned with the impacts this proposed development could have on these resources. In particular, we will again address the inadequate purpose and need statement for this analysis, the incomplete cumulative impact analysis, and reemphasize the need for the BLM to fully analyze alternative routing for certain segments of the transmission line. We will advocate the BLM completes a supplemental environmental impact analysis to fill in the gaps left in this analysis.	The EIS documents an extensive and detailed look at the proposed and alternative routes and their effect on resources. It includes numerous avoidance, minimization, and mitigation measures, including additional off-site compensatory mitigation which has been included in the ROD. We do not agree that the analysis is inadequate or that a supplemental EIS is required.

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101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	<p>I. Purpose and Need</p> <p>The BLM received numerous comments about inadequate purpose and need statement in the draft environmental impact analysis for the Gateway West project. The Wyoming Outdoor Council finds that the statement in the FEIS is technically correct, but the implementation or follow-through on this statement remains inadequate.</p> <p>The BLM acknowledges that the impetus for this project analysis was a request for a Right-of-Way grant across the National System of Public Lands from Idaho Power Company and PacifiCorp, doing business as Rocky Mountain Power, and hereafter, the Proponents. The FEIS states that the proposed 990 miles of new 230-kilovolt and 500-kilovolt alternating current (AC) electrical transmission system is needed “to supplement existing transmission lines” to “relieve operating limitations, increase capacity, and improve reliability in the existing electrical transmission grid.” Additionally, the project is “principally necessary to serve the Proponents’ customers” as well as “other markets.” (FEIS Chapter 1-1)</p> <p>While analyzing the “purpose and need” for this project for other federal agencies, the BLM then correctly states that in accordance with the Federal Land Policy Management Act and the agency’s own ROW regulations, 43 CFR Part 2800, the BLM manages public lands for multiple uses that “take into account the long-term needs for future generations of renewable and non-renewable resources.” In responding to the Proponents’ project proposal, the BLM can grant, grant with modifications, or deny the application. These modifications can range from granting only a portion of the project, modifying the proposed use, or changing routes or locations of facilities in accordance with managing for the public interest (43 CFR § 2805. 10(a)(1)). We find that this Purpose and Need statement is technically correct, but it is not implemented throughout the FEIS. While it is stated accurately it is not accurately put into practice. We would find better evidence the BLM was balancing multiple use as its purpose for this project if alternative routes were not discarded because of less economic feasibility for the proponent. This type of decision-making skews the purpose and need for this analysis to fit the proponents’ purpose and need, not the BLM’s. (see FEIS 2.2.2. “Was the alternative economically feasible?”) We have previously stated this position, but need to re-emphasize it at the FEIS stage as it has continually not been re-addressed by the BLM. If an alternative route (as we suggest below, in section III.) satisfies the BLM’s multiple use mandate, regardless of whether or not it is the cheapest route for the Proponents’, it must be considered in full. The purpose and need for the project is the BLM’s multiple use mandate, not the Proponent’s profit-and-loss statement for the project. This type of decision-making has excluded several viable alternative routes we will discuss in more detail below.</p>	<p>The FEIS documents how the BLM and other agencies have balanced the need for upgrading the electric grid with protecting resources on public lands. For example, routes across preliminary priority sage-grouse habitat in Idaho and in core habitat in Wyoming outside the Governor’s corridor are generally avoided, as is the SRPOP NCA and routes near parks, monuments, wilderness study areas, and refuges. Preferred routes were identified that reduced effects on cultural resources and trails. An intensive analysis of impacts to sage-grouse was completed.</p>

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101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	<p>II. Cumulative Impact Analysis: We appreciate the BLM's effort to augment its cumulative impact analysis between the draft and final EIS in response to comments from WOC and other organizations. However we find this analysis is still inadequate. Instead of adding substantive analysis to the cumulative impacts the Gateway West transmission line would have on the landscape, the BLM has chosen to simply review the latest NEPA hotsheet and list potential projects in the area. This is a good start. But cumulative impact analysis necessitates much meatier analysis, one which does not simply list proposed projects in the same area as the Gateway West line. What is needed is in-depth analysis of the scope and scale of projects that would be incentivized, made more feasible, or allowable because of the Gateway West project. A proper analysis of cumulative impacts includes a hard look at connected and similar actions. In addition, a thorough look at cumulative impacts satisfies the following question: How and where are direct, secondary, indirect, and cumulative effects and impacts defined? The CEQ regulations (40 CFR §§ 1500 -1508) define the impacts and effects that must be addressed and considered by Federal agencies in satisfying the requirements of the NEPA process. This includes direct, indirect and cumulative impacts: Direct effects are caused by the action and occur at the same time and place. (40 CFR § 1508.8). Indirect effects 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 CFR § 1508.8)</p> <p>Cumulative impact is the impact on the environment, which results 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. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR § 1508.7)</p> <p>The terms "effect" and "impact" are used synonymously in the CEQ regulations (40 CFR §1508.8). "Secondary impact" does not appear, nor is it defined in either the CEQ regulations or related CEQ guidance. However, the term is used in the Federal High Way Administration's Position Paper: Secondary and Cumulative Impact Assessment In the Highway Project Development Process (April, 1992) but is defined with the CEQ definition of indirect impact (40 CFR § 1508.8).</p>	As required by NEPA, the FEIS includes an analysis of cumulative effects from past, present, and reasonably foreseeable future projects. The FEIS discloses direct and indirect effects in Chapter 3 and cumulative effects in Chapter 4. We believe that the analysis documented in the FEIS is sufficient for a reasoned decision.
101012	BRUCE PENDERY, DUANE SHORT,	WYOMING OUTDOOR COUNCIL,	In particular, we have two concerns that are not addressed by the FEIS cumulative impacts analysis in Chapter 4. They are primarily related to the Gateway West project because they are "reasonably foreseeable	Currently, there is one 230-kV line which crosses north/south through Shirley Basin area. The Gateway West Project would include a second 230-kV line being built adjacent to the existing

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	JULIA STUBLE	BIODIVERSITY CONSERVATION ALLIANCE	<p>future actions.” Our first problem with the current cumulative impact analysis concerns the Aeolus substation in the Shirley Basin. The FEIS states that before the Aeolus substation, the Gateway West will be a 230 kV line. After this substation, the Gateway West will have a 500 kV capacity. This dramatic increase is evidence that new energy generation facilities are being planned for—or could be developed now that a high- capacity line is in the region. Without Gateway West, these energy generation facilities would be less feasible. Being dependent on the Gateway West’s increased capacity after Aeolus makes any possible wind generation a cumulative impact on the Gateway West line and demands full analysis now—to wildlife, viewshed, cultural, historic and other resources. The Wyoming Outdoor Council has identified the Shirley Basin as a Heritage Landscape: a place with irreplaceable and threatened wildlife habitat, phenomenal recreation opportunities, and matchless viewsheds. We identify the Shirley Basin as an important, relatively undeveloped mixed-grass prairie and sagebrush landscape that supports abundant wildlife, including sensitive species such as golden eagles and greater sage-grouse, big game, and the endangered black-footed ferret. We are particularly concerned with the potential impacts that the Gateway West transmission line would pose for golden eagles and greater sage- grouse if it were routed through the Shirley Basin. These impacts are multiplied many times over if additional wind generation facilities are made possible by the Gateway West as an alternative current transmission line that doubles its capacity at a substation in the Shirley Basin. The BLM is remiss in its cumulative impact analysis if it approves, without full analysis of all indirect impacts, a transmission line that facilitates future industrial development in a sensitive and relatively pristine landscape. We urge the BLM to fully analyze cumulative impacts for the Gateway West project, in particular, giving a hard look to the increased capacity of the Aeolus substation and the resultant energy generation facilities for which that capacity would provide.</p>	<p>line, and the existing line would be rebuilt. The effects of the additional line are disclosed in the FEIS, as are the impacts resulting from development of the Aeolus and Shirley Basin substations. Chapter 4 discusses the proposed transmission lines that may connect with the Aeolus Substation. These lines are displayed in Figure E.24-1 in Appendix E to the FEIS. Figure E.24-3 displays the existing and proposed power generating sites in Southeast Wyoming, none of which are in the Shirley Basin. As Figure E.24-1 shows, we did not identify any foreseeable transmission line projects in Shirley Basin. The BLM recognizes that the Shirley Basin is an important area for wildlife and recreation. Surveys were completed to evaluate the area for wilderness values; refer to Section 3.17.1.6 for the results.</p>
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	<p>We also find the cumulative impact analysis lacking in regard to several other proposed high-voltage transmission lines. We have long applauded the BLMs dedication to co-locating these types of developments to ensure they pass through “brown” not “green” fields. This has been a sound policy. However, in light of the quantity of sizable transmission lines that are currently proposed for Wyoming, the co- location policy may need revision. At the least, this policy is relevant to Gateway West’s cumulative impacts as, after Gateway is built, it will be a development that invites co-location. We have particular concern, again, for the Shirley Basin and the possibility that other high capacity transmission lines will be able to cross the Basin by paralleling Gateway West. This will further the industrialization and degradation of this unmatched landscape and its wildlife habitat. In particular, the impacts</p>	<p>Shirley Basin lies to the north of the Freezeout Mountains. The Aeolus Substation lies to the south. Our analysis in Chapter 4 of the FEIS indicates that new lines are proposed to the east and south of Aeolus. We did not identify any reasonably foreseeable transmission lines or power generating facilities in the Shirley Basin. See Figures E.24-1 and E.24-3 in Appendix E to the FEIS.</p>

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			of the proposed Gateway South transmission line must be fully analyzed during the Gateway West process as the Gateway South line depends on the construction of the Aeolus substation on the Gateway West line and may follow Gateway West out of the Shirley Basin to Interstate 80. (see Appendix A: Gateway South Scoping Routes) It is untenable that another high-voltage transmission line will possibly be constructed dependent on the infrastructure of another project, and yet not be analyzed as a cumulative impact. We urge the BLM to also complete this section of the cumulative impact analysis of Gateway West in order not to be remiss on the scope of its environmental analyses.	
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Additionally, it is highly concerning to us that not only the Gateway West line would increase in capacity at Aeolus, but the Proponents have proposed an additional high- voltage transmission line beginning at that substation. This can only mean additional energy generation—probably as wind farms—are either currently being planned or will be planned soon after the transmission line development. That this is not a fully analyzed cumulative impact of the Gateway West project is indefensible.	Shirley Basin lies to the north of the Freezeout Mountains. The Aeolus Substation lies to the South. Our analysis in Chapter 4 of the FEIS indicates that new lines are proposed to the east and south of Aeolus. We did not identify any reasonably foreseeable transmission lines or power generating facilities in the Shirley Basin. See figures E.24-1 and E.24-3 in Appendix E to the FEIS.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	III. Transmission Line routing As we have previously stated in our comments on Gateway West's DEIS and SEIS, we are concerned about the proposed route in the Shirley Basin and in the Kemmerer area and we urge the BLM to modify these routes from the current preferred alternative. Some of the alternatives that have been excluded from full analysis have been arbitrarily excluded, we argue, and should be re-evaluated.	Section 2.4.12 describes the reasons alternatives were eliminated from detailed study. All alternatives have adverse impacts on important resources, as well as on individuals. After years of analysis, it is clear that no alternative is likely to garner universal support in Segments 1 and 4.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Shirley Basin Regarding proposed routes through or around the Shirley Basin, we urge the BLM to give more analysis to a route that would travel south along the eastern side of the Laramie Mountains. Specifically, we believe a route should be considered and adopted that follows the existing transmission line corridor shown on Figure A-2 in the FEIS that runs from the Dave Johnstown Power Plant to in the vicinity of Wheatland. The power line could then run west from there to the Aeolus substation. In its comment response, the BLM cites that this alternative adds additional miles, crosses more big game crucial winter range, and may impact more greenfield than brownfield. We challenge these assertions. First, 48 additional miles is not significant in relation to the full extent of the Gateway West line—and this reasoning sounds more in line with the Proponents' Purpose and Need, not the BLM's. Second, this alternative may impact more big game crucial winter range, but less crucial habitat for a variety of avian and sagebrush obligate species as it would in the Shirley Basin. We argue that the impacts of a high-voltage transmission line creates more negative effects on avian species, including golden eagles and	Following the route referred to as "East of Laramie Mountains Alternative" in the DEIS would avoid Shirley Basin; however, it would be approximately 75 miles longer than 1W, resulting in much greater disturbance. Also, about 75 percent of the East of Laramie Mountains Alternative route would be greenfield. We do not agree that the additional 75 miles of disturbance is insignificant. Please note that the 48 miles the comment refers to is from the comparison with Proposed 1E, not with 1W (1E is 27 miles longer than 1W). If the route followed the existing line all the way to Wheatfield as the comment recommends, the route would be even longer and involve even more disturbance. The Preferred Route, which follows an existing line, is consistent with the Governor's sage-grouse policy and involves substantially less new disturbance than the much longer route east of the mountains. If the main objective is to avoid Shirley Basin, then the route east of the mountains meets the objective. It also avoids sage-grouse core areas (but not sage-grouse habitat). In most other respects, however, it is less desirable.

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			greater sage-grouse, than it does on big game. If the BLM insists on using big game winter range as a reason to cross the Shirley Basin, we ask for evidence of the impacts a high-voltage transmission line has on big game as compared to a variety of avian species. Third, we believe the BLM has overstated the impact this route would have on greenfield. We note that at least half and probably more of this proposed route would follow an existing transmission line. Thus, the impacts to greenfields certainly would not necessarily have "substantially more disturbance along the entire corridor, relative to the considered routes." (See FEIS at 2-87)	
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	A route east of the Laramie Mountains has several advantages over the preferred alternative. These include avoiding sage-grouse core areas, as shown by Figure 3.11-1 in the FEIS. This is direct contrast to the preferred alternative and proposed route through the Shirley Basin, which traverses a significant amount of sage-grouse core area. Avoidance of core area must be a fundamental priority of the BLM during the siting of this transmission line and must trump the need to avoid some big game winter range east of the Laramie Mountains.	The Preferred Route, which follows an existing line, is consistent with the Governor's sage-grouse policy and involves substantially less new disturbance than the much longer route east of the mountains. The East of Laramie Mountain Route would be more than twice as long and crosses 56 more miles of crucial big game winter range. Also note the new 1W line would be built on the east side of the existing line, not through the large, undeveloped area to the west of the existing line.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Additionally, avoiding the Shirley Basin is a distinct advantage by helping to maintain the incredible wide open spaces of this area. Avoiding this area is also extremely valuable for big game species, raptors, and endangered species such as the black-footed ferret.	The Preferred Route for the proposed 230-kV line follows an existing 230-kV line. The existing line has been in place for many years. The additional line will not be crossing through undisturbed "wide open spaces". The East of Laramie Mountains Route is approximately 75 miles longer than the Preferred Route (more than double the length) and would cross 10 miles of steep slopes.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	This wide open, wild area is also tremendously valuable to the public which values these undeveloped landscapes and which would prefer that they remain undeveloped.	The Preferred Route for the proposed 230-kV line follows an existing 230-kV line. The existing line has been in place for many years. The additional line will not be crossing through undisturbed "wide open spaces". Surveys were completed in the Shirley Basin area to determine if there were lands in the area that had wilderness characteristics, and none were identified. Please refer to Section 3.17.1.6 for a summary of the results.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Following a route east of the Laramie Mountains would avoid the Bates Hole Management Area, which is to receive special protections pursuant to the Casper RMP. A travel management plan is currently being developed for the Bates Hole Management Area. A cumulative impacts analysis must include known future connected and similar actions. Rerouting in this instance would avoid any need to amend the Casper RMP and ensure this important natural area is protected. Also, this route would avoid the Medicine Bow National Forest and the need to amend that Forest Plan relative to issues such as raptor protection.	Following the route to the east of the Laramie Mountains would be 75 miles longer than the Preferred Route (more than a 100 percent increase); it would involve more disturbance compared to following the existing line. Most of the route would be greenfield. The Preferred Route, which follows an existing line, is consistent with the Governor's sage-grouse policy and involves far less new disturbance than the much longer route east of the mountains.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY	Following a route east of the Laramie Mountains would avoid the Bates Hole Management Area, which is to receive special protections pursuant to the Casper RMP. A travel management plan is currently being developed for the Bates Hole Management Area. A cumulative	Following the route referred to as "East of Laramie Mountains Alternative" would avoid Bates Hole; however, it would be approximately 75 miles longer than the Preferred Route (1W), resulting in much greater disturbance. Also, about 75 percent of

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		CONSERVATION ALLIANCE	impacts analysis must include known future connected and similar actions. Rerouting in this instance would avoid any need to amend the Casper RMP and ensure this important natural area is protected. Also, this route would avoid the Medicine Bow National Forest and the need to amend that Forest Plan relative to issues such as raptor protection.	the East of Laramie Mountains Alternative route would be greenfield. The Preferred Route, which follows an existing line, is consistent with the Governor's sage-grouse policy and involves much less new disturbance than the much longer route east of the mountains. Also, Bates Hole lies to the west of the existing 230 kV line. The new transmission line would be on the east side of the existing line and would avoid Bates Hole. No amendments to the Casper RMP are proposed for the Preferred Route so the comment is not correct in this regard. It is correct that the Medicine Bow Forest Plan amendment for goshawk would be avoided if the East of Laramie Mountains Route was used; however, other resources would be affected, including about 60 additional miles of crucial big game winter range.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	In any event, we do support the BLM's decision to choose Alternative 1W(c) over Alternative 1W(a). If BLM maintains its Preferred Alternative as a route through the Shirley Basin, Alternative 1W(c) is a better option. This alternative would reconstruct an existing 230 kV line rather than also constructing a new line. This significantly reduces environmental impacts and we urge the BLM to adopt this alternative.	Segment 1W includes both 1W(a) and 1W(c), one is a rebuild of the existing line and the other is a new line running parallel to the existing line. The 1W(a) and 1W(c) routes are not alternatives to each other; both are part of the proposed action.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Kemmerer area There a number of problems with the Preferred Alternative in western Wyoming, making this route one that must be avoided and analysis given to other alternatives (that may have been disregarded, inappropriately, due to confusing the Proponents' and BLM's Purpose and Need statements). The proposed power line in the Kemmerer area has a great number of significant environmental problems. These include impacts to National Historic Trails and impacts to visually sensitive areas. This level of impact must be reduced by entirely rerouting or, if possible, by meticulously threading the lines, as necessary, to avoid these conflicts. In this area the impacts of the Gateway West project are too significant and long-lasting to allow for approval of the project as proposed under the preferred alternative.	The Preferred Route in the Kemmerer area follows three existing transmission lines. It was widely supported in the public and agency comments on the DEIS. The route is within the Governor's sage-grouse corridor and has less impact on historic trails than other options considered. Refer to Table 2.8-3 of the FEIS for a comparison of resource effects.
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	There a number of problems with the Preferred Alternative in western Wyoming, making this route one that must be avoided and analysis given to other alternatives (that may have been disregarded, inappropriately, due to confusing the Proponents' and BLM's Purpose and Need statements). The proposed power line in the Kemmerer area has a great number of significant environmental problems. These include impacts to National Historic Trails and impacts to visually sensitive areas. This level of impact must be reduced by entirely rerouting or, if possible, by meticulously threading the lines, as necessary, to avoid these conflicts. In this area the impacts of the Gateway West project are too significant and long-lasting to allow for approval of the project as proposed under the preferred alternative. The FEIS repeatedly emphasizes the significance of these problems if the project were built as contemplated in the preferred alternative. These	The BLM worked with local stakeholders and the local BLM Field Office staff to develop alternatives for the Kemmerer area. No alternative completely avoided all important resources. Please refer to the description of the routes considered but eliminated (Section 2.4.12 in the FEIS) for the reasons why these were not selected. The I-80 route was eliminated from detailed study as explained in Section 2.4.12.4 of the FEIS. This route is 266 miles long, 136 more miles of which is on private land than the Preferred Route. The Southern WWE Corridor Alternative (as it was called in the DEIS) crosses densely populated portions of the Salt Lake Valley and crosses steep mountain areas where it follows existing lines. In addition, it does not access the Populus or Borah Substations. Shifting the line south would result in greater disturbance to important resources, not less.

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			impacts appear to exist or occur even if the various feasible alternative routes were selected. Therefore, other alternative routes should be considered and adopted in the record of decision. We believe there are three additional routing possibilities. In turn they are: the Southern WWE Corridor alternative, the existing transmission corridor between Kemmerer and Bear Lake, and the transmission corridor from Naughton Power Plant southwest to Uinta County and then into Rich County, Utah. The Southern WWE Corridor alternative was considered in the FEIS but not in detail (see FEIS at 2-91). This alternative should be adopted as the preferred alternative for this segment of the Gateway West project because it would virtually eliminate the extreme environmental problems that would accompany the current preferred route in the Kemmerer area. Fundamentally the Southern WWE Corridor Alternative tracks along I-80 into the Utah and then tracks north through the heavily developed Wasatch Front area to reconnect with the proposed Gateway West corridor in Idaho. I-80 is the appropriate corridor for the Gateway West project to follow, not the more northern route near Kemmerer. This is recognized in the Kemmerer RMP, which designates a high voltage corridor along I-80 and certainly not in the more northern area that the current preferred alternative would intrude into. (See Kemmerer RMP Record of Decision at Map 13) This routing has the advantage of avoiding the significant special management areas provided for in the Kemmerer RMP, such as the Raymond Mountain and Rock Creek/Tunp areas, as well as the protected visual environments and the National Historic Trail Corridors. (See Kemmerer RMP Record of Decision at Maps 19, 20, and 21) This route would also probably totally avoid sage-grouse core areas. (See FEIS at Figure 3.11-1)	
101012	BRUCE PENDERY, DUANE SHORT, JULIA STUBLE	WYOMING OUTDOOR COUNCIL, BIODIVERSITY CONSERVATION ALLIANCE	Fundamentally the Southern WWE Corridor Alternative tracks along I-80 into the Utah and then tracks north through the heavily developed Wasatch Front area to reconnect with the proposed Gateway West corridor in Idaho. I-80 is the appropriate corridor for the Gateway West project to follow, not the more northern route near Kemmerer. This is recognized in the Kemmerer RMP, which designates a high voltage corridor along I-80 and certainly not in the more northern area that the current preferred alternative would intrude into. (See Kemmerer RMP Record of Decision at Map 13) This routing has the advantage of avoiding the significant special management areas provided for in the Kemmerer RMP, such as the Raymond Mountain and Rock Creek/Tunp areas, as well as the protected visual environments and the National Historic Trail Corridors. (See Kemmerer RMP Record of Decision at Maps 19, 20, and 21) This route would also probably totally avoid sage-grouse core areas. (See FEIS at Figure 3.11-1)	The reasons that the I-80 route was eliminated from detailed study are explained in Section 2.4.12.4 of the FEIS. This route is 266 miles long, 136 more miles of which is on private land than the Preferred Route. The Southern WWE Corridor Alternative (as it was called in the DEIS) crosses densely populated portions of the Salt Lake Valley. In addition, it does not access the Populus or Borah Substations. Accessing these substations would require many more miles of new transmission line, resulting in even more disturbance than the Preferred Route.

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			<p>The BLM rejects this routing choice from detailed consideration because it claims there are five problems with the route. In turn, these problems are, and the reasons they are not valid reasons to eliminate the route from consideration include:</p> <p>1. The BLM claims that this route “Does not meet the Proponents’ Objectives, as it would neither be feasible to connect to the Populus Substation nor would this alternative allow for the proposed connection between Populus and Borah Substations along Segment 5.” (FEIS at 2-92.) This claim needs substantiation before it is used as a basis for rejecting this route. As we have previously noted, BLM’s purpose and need for this project is take into account the agency’s multiple use mandate while responding to a ROW application—an application that can be granted, modified, or denied depending on the ability to manage it under the multiple use mandate.</p> <p>These objectives clearly can be met even if the route was placed along I-80. There is nothing in BLM’s purpose and need for this project that demands that a Populus station connection be achieved nor is there a requirement for a connection between Populus and Borah under the terms of BLMs’ purpose and need statement. BLM specifically has the right to grant construction of this project with modifications. It is obligated to reduce environmental impacts, as the I-80 route clearly would do relative to the more northern route. The public interest is the fundamental guide, and the public interest will clearly be better served by routing this transmission line along I-80 than through the environmentally sensitive Kemmerer area.</p>	
101013	CORDELL KRESS		<p>My name is Cory Kress. I am a farmer in the Rockland Valley. My family has farmed in this valley for 101 years spanning 5 generations. I am the current Vice-President of Guardians of Agricultural Lands, Inc. (GOAL, Inc.). That entity was formed to protect the continuing encroachment and destruction of agriculture. I have participated with the Power County Gateway West Citizens Task Force and attended meetings with the BLM and other groups.</p> <p>I am extremely upset at the BLM’s preferred alternatives for Segments 5 and 7. It seems like they paid no attention to all of our comments and concerns about the impact the BLM action could have upon our agricultural livelihood.</p>	The BLM did listen to your comments and concerns. However, there are many factors to consider in selecting the preferred alternative. Please refer to Section 2.4.1 for the reasons that the BLM’s preferred alternative was identified. Please refer to the discussion of siting through agricultural lands in Section 3.18, including Figure 3.18-2 which shows how towers would be sited in agricultural lands.
101013	CORDELL KRESS		The BLM does seem concerned about the visual impacts of placing the line on public land, but seems absolutely unconcerned about placing the line on private land. The BLM’s preferred alternative for Segment 7 would run the transmission line directly over my house. I do not understand why that visual impact is not a consideration for the BLM, but placing the line on public land is.	The line shown in the FEIS is based on indicative engineering. The design line would not pass directly over anyone’s house. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit the project on private or state lands.
101013	CORDELL KRESS		Our task force and Power County, as a Cooperating Agency, has worked hard with the BLM and other state and federal agencies to find acceptable alternatives that would not have such a tremendous negative	BLM listened to the task force, as it did to other stakeholders. The County selected Alternative 5C as the Preferred Route and BLM supported this route. The BLM confirmed its Preferred Route for

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			impact. The BLM paid lip service to our work and then completely ignored it in favor of their own preferences. As a citizen and a taxpayer, I would hope my federal government would have my interests more in mind than they have shown with this decision.	Segment 5 following government-to-government consultation with the Shoshone-Bannock Tribes. However, in October 2012, the Tribes notified the BLM that they no longer wished the alignment crossing the Fort Hall Indian Reservation to be considered for the Project. The BLM lacks the authority to grant a ROW on tribal lands or any lands other than those prescribed by law. Federal law (25 U.S.C. §324) provides: “No grant of a right-of-way over and across any lands belonging to a tribe organized under the Act of June 18, 1934 (48 Stat. 984) [25 USCS § § 461 et seq.], as amended; the Act of May 1, 1936 (49 Stat. 1350); or the Act of June 26, 1936 (49 Stat. 1967) [25 USCS § § 501 et seq.], shall be made without the consent of the proper tribal officials.” The Fort Hall Reservation was organized under the Indian Reorganization Act of June 18, 1934. Following the Fort Hall Business Council’s decision not to permit the Project to be built across the Reservation, the BLM reviewed the remaining route choices analyzed in the Draft EIS, all of which potentially impacted BLM-managed lands, and selected the Proposed Route across federal land incorporating Alternatives 5B and 5E as its Preferred Route for Segment 5.
101013	CORDELL KRESS		Many people, including the federal government will be hurt if this line is built so that it negatively impacts our economy.	Economic impacts are discussed in Section 3.4 of the FEIS.
101013	CORDELL KRESS		In Idaho the counties have the authority to locate electric transmission lines. Again, the BLM ignored the county’s stated preference for location of this line. They did so because of some vague guidelines that gave them great leeway, which they chose not to exercise. The BLM needs to back to stage 1 and work with the landowners, not just dictate to them where it is going.	The comment is correct, the BLM has no authority to make any decision on siting the project on non-federal lands. It only makes a decision on where and whether the Project will be permitted on federal land that it manages.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Prairie Falcon Audubon(PFA) would expect some adjustments when putting in a large transmission line, but the fact BLM RMPs across the project area have to be amended to accommodate Gateway is a red light for PFA. This sacrifices important, irreplaceable, and sensitive areas, including important wildlife habitat, and visual resources, etc., by reducing or removing protective restrictions to allow the project.	The BLM worked with stakeholders to site the project where it would have the least impact. Sometimes this meant crossing areas that would not be in conformance with the management plan; in these cases, the BLM identified the plan amendments that would need to be approved if the alternative were selected. Refer to Appendix F for a discussion of the amendments considered in this Project.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Project proponents are aware of this too, as stated in the FEIS: “The amendment(s) allowing a new Right Of Way(ROW) outside the existing corridors 2 could result in cumulative impacts from future development, such as additional impacts on visual, wildlife, plant, cultural, and vegetation resources” FEIS F.1-30.	The FEIS acknowledges that this is possible.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	PFA is against changes to all 18 Bureau of Land Management(BLM) Field Offices' Resource management Plan(RMP) amendments in the FEIS in general and in particular, amendments to the Cassia RMP, Twin Falls Management Framework Plan(MFP), and the Jarbidge RMP.	Your position on these issues is noted.

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101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	PFA is against changes to all 18 Bureau of Land Management(BLM) Field Offices' Resource management Plan(RMP) amendments in the FEIS in general and in particular, amendments to the Cassia RMP, Twin Falls Management Framework Plan(MFP), and the Jarbidge RMP. Reasons in particular, Cassia RMP, Twins Falls MFP, and Jarbidge RMP are as follows: 3.6 Cassia RMP Amendments FEIS F.1-28: Parts of the route through BLM Burley Field Office(F.O.) are in a National Audubon Society" International Important Bird Area (IBA) for the protection of sage-grouse.	The Preferred Route generally avoids preliminary priority sage-grouse habitat and the IBAs. Table 3.10-5 of the FEIS discloses where the alternatives cross an IBA and the miles crossed.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	3.7 Twin Falls MFP Amendments FEIS F.1-31 and 3.8 Jarbidge RMP, FEIS F.1-37: BLM Burley F.O. management and proponents arbitrarily decided, without public knowledge, input, or regard; to change the route, in segment 9, after the Draft EIS, and take the line along rim of and across the Salmon Falls Creek Canyon, including Lily Grade. Interested public was not given this information or a opportunity to comment.	This was not an arbitrary change. The Draft EIS is just that, a draft. It is standard practice to collect information between draft and final and make adjustments. These are presented to the public in the FEIS for comment. The reason for the change is presented in Section 1.1.1 of the FEIS.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	3.7 Twin Falls MFP Amendments FEIS F.1-31 and 3.8 Jarbidge RMP, FEIS F.1-37: BLM Burley F.O. management and proponents arbitrarily decided, without public knowledge, input, or regard; to change the route, in segment 9, after the Draft EIS, and take the line along rim of and across the Salmon Falls Creek Canyon, including Lily Grade. Interested public was not given this information or a opportunity to comment. 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 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). There was a different publicly disclosed route, Alternative 9C, in the Draft EIS 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.", .. "An alternative crossing of the river (Alternative 9C) would avoid the eligible WSR and the ACEC (emphasis added)." ... "The Burley FO has stated that the WSR classification at this location is "Recreational" and that this crossing would not have a negative effect on the outstandingly remarkable values (ORVs) for that classification (emphasis added). Amendments for crossing the ACEC and VRM Class II lands are therefore provided in the Final EIS." FEIS F1-31. 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. Why? It's also very difficult to assess 9c on the map in the handouts, and it's not included on the map in FEIS appendix F.1-34. Both Jarbidge RMP and Twin Falls MFP direction for Visual Resources gives explicit instructions on how the ACEC and Salmon Falls Creek Canyon should be managed.	This was not an arbitrary change. The Draft EIS is just that, a draft. It is standard practice to collect information between draft and final and make adjustments. These are presented to the public in the FEIS for comment. The reason for the change is presented in Section 1.1.1 of the FEIS. Figure 3.17-10 clearly shows Alternative 9C and the Lilly Grade crossing (at a scale of one-half inch equals one mile). The text associated with this figure explains the issue. We are sorry that you had trouble viewing the map on the Web site; however, we believe that the analysis in the Lands and Recreation section (3.17) is very clear. Also, see the figures and photos for the area in Appendix G-1. Figure 5.8-3 shows the area at a scale of 1.25 inches to the mile. Figure B-14 shows a photo of the Lilly Grade Road from within the canyon (it is a paved two-lane road that crosses the ACEC).

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101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	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. Why? It's also very difficult to assess 9c on the map in the handouts, and it's not included on the map in FEIS appendix F.1-34.	Figure 3.17-10 clearly shows Alternative 9C and the Lilly Grade crossing. The text associated with this figure explains the issue. We are sorry that you had trouble viewing the map on the Web site; however, we believe the analysis in the Lands and Recreation section (3.17) is very clear. Also, see the figures and photos for the area in Appendix G-1. Figure 5.8-3 shows the area at a scale of 1.25 inches to the mile. Figure B-14 shows the Lilly Grade Road from within the canyon (it is a paved two-lane road that crosses the ACEC).
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	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. Excepting wind energy which is essentially costly, inefficient, and if sited wrong, deadly to wildlife. As referenced "In a Rational Look at Energy" by Kimball Rasmussen, President and CEO of Deseret Power.	Your position on siting increased transmission capacity is noted. See Section 1.3 for a discussion of transmission planning and reliability.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	there's been 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 the future development of proposed ill-sited wind farms: Cotteral Mountains, China Mountain, Simplot, and South Hills Important Bird Area,etc. Thereby further degrading sage-grouse and other wildlife's habitat.	As stated in Section 2.1: "The Proponents have proposed this split because of the need to serve customers along each route and also to increase reliability."
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	the reasoning behind many of the amendments is unclear and confusing.	The reason for the proposed amendments, as well as for amendments associated with other alternatives, is included in Appendix F.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	the FEIS acknowledges direct, indirect, and cumulative impacts, but at the same time draws the conclusion, that because of proponent's "purpose and need", the project should proceed despite these negative impacts.	As stated in Section 1.2, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM relies on DOE and FERC to evaluate the Proponents' objectives. Based on the analysis in the FEIS, the BLM has selected Preferred Alternatives that seek to reduce environmental effects while also meeting both the federal and Proponents' purpose and need. The FEIS includes numerous avoidance, minimization, and mitigation measures, including additional off-site compensatory mitigation. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. See Appendix C of the FEIS for mitigation plans.

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101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>Instead of working within the confines set by the BLM FO.s' RMPs, for the protection of invaluable natural resources for the public good; proponents seek to undermine it.</p> <ul style="list-style-type: none"> Many of the impacts throughout the project area can't be mitigated. As undeveloped areas of public land are becoming scarce, true mitigation becomes impossible. How can the proponents mitigate visual values? 	<p>Mitigation plans are included in Appendix C of the FEIS. Following comments on the FEIS, the Proponents have offered additional mitigation for direct effects. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The FEIS disclosed that, even with the proposed mitigation, there would still be adverse impacts. Visual impacts are an example. The fact that the effects on many KOPs would be high is disclosed in the effects analysis for each segment in Section 3.2.2. One of the reasons for completing an EIS is that the Project would result in significant effects on the environment. NEPA requires such environmental impacts to be analyzed and considered in decisions regarding major federal actions; it does not require agencies to avoid all adverse effects.</p>
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	FEIS does not adequately address ongoing threats to the project area such as livestock overgrazing and invasive grasses and weeds, etc. The proposed project would only increase these impacts, these amendments would significantly downgrade protections to important natural resources such as visual, wildlife, and special designated areas .	The Project involves construction and operation of a transmission line. It would not increase impacts from grazing. The proposed mitigation plans for sage-grouse and for the NCA (attached to the ROD) include compensatory mitigation, such as habitat restoration and purchase of conservation easements and land, to offset adverse impacts on habitat. Refer to Section 3.8 for the analysis of invasive species impacts. Also see Table 2.7-1 for avoidance, minimization, and mitigation designed to limit any adverse impacts from invasive species.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	We believe amending RMPs for Gateway will set a precedent for projects in the future. The very thing the older, more thoughtful, and protective RMPs protect, the FEIS states, "If the amendment 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." Allowing a second project will be much easier.	As stated in Appendix F, any new proposal would require a separate NEPA analysis. However, the FEIS discloses that future proposed utility lines would be likely to consider following the Gateway West alignment if it is approved and built.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	In particular, PFA is against amendments to the Cassia RMP, Twin Falls MFP, and the Jarbidge RMP. Members and supporters make extensive use of these public lands because of it's close proximity to where we live	Your opposition to these amendments is noted. Please refer to the BLM response to protests of these amendments (Appendix K to the ROD).
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>The FEIS states, "there is concern about major transmission lines causing serious adverse environmental impacts in the Foothills area, the Shoshone Basin, and along Salmon Falls Creek."</p> <p>The above sited areas are in Burley F.O., and their Twin Falls District. Cassia RMP Amendments FEIS F.1-28:3.7</p> <ul style="list-style-type: none"> There is a National Audubon Society International Important Bird Area(IBA), The South Hills, that comprises 640,000 acres of US Forest Service land in the Minidoka R.D. Sawtooth National Forest and the BLM Burley Field Office (see map on page 8) where alternative 7K will follow from the Nevada border to the proposed Cedar Hill Substation, 	<p>Alternative 7K crosses the Sawtooth NF and approximately 37.6 miles of the South Hills and Raft River-Curlew IBAs. The Preferred Route for Segment 7 does not cross the Sawtooth NF. It does crosses about 10 miles of the South Hills IBA. The Preferred Route for Segment 7 impacts 149 acres of Preliminary Priority Habitat (PHH) for sage-grouse, compared to 1,366 acres for Alternative 7K. Refer to Sections 3.10 and 3.11 of the FEIS.</p>

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			<p>which is sited between two roads used by many in Magic Valley to enter the South Hills for recreation, Sunday drives, and other other pleasant pursuits, sited on the edge of the IBA as well. A substation located along the Hills would be a ugly reminder of BLM's apparent lack of commitment to upholding their F.O. RMP protections in the interest of the public.</p> <ul style="list-style-type: none"> • The South Hills IBA was jointly approved by the US Forest Service and BLM. The IBA is designated for protection of sage-grouse and is home to over 150 bird species. The USFS Minidoka Ranger District(RD). BLM Burley Field.Office(FO), and Twin Fall BLM District are important stopover areas for migrating birds and bats on their way across the Snake River Plain. The project manager was advised that this is a IBA when alternatives comprising the now 7k were announced in a email (2-23-2012) and it was fully explained in our comments and addendum.. <p>The importance of the Burley F.O. to sage -grouse is significant. Idaho Fish and Game have tracked them in the project area along the South Hills. There is also ongoing project to enhance sage-grouse habitat throughout Burley BLM including the project area.</p> <ul style="list-style-type: none"> • Habitat fragmentation from livestock overgrazing, developments, roads, and infrastructure, documented by members of PFA, are factors in contributing to the ongoing degradation of sagebrush-steppe and sage-grouse populations in the Burley F.O. With soil disturbance, invasive weeds and grasses follow as does chronic wildfire, further degrading sagebrush steppe. <p>Power lines give predators perches and associated roads give the public ready access to sensitive areas. These factors are well known to BLM as is the threat of listing sage-grouse as an endangered species.</p>	
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	The area's fragile soils erode easily and as 4 mentioned in the FEIS would "result in effects to the existing environment". FEIS F.1-30.	Refer to the mitigation measures summarized in Table 2.7-1 for measures designed to avoid, minimize, and mitigate soil erosion.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	Disturbance from the construction phase and as well as "routine and corrective operations and maintenance activities throughout the year" FEIS F, require new roads to areas that have very little traffic now. The USFS Minidoka RD. is already in litigation over their travel plan, because of high road densities and motorized trails in sensitive areas. 3.7 Twin Falls MFP Amendments FEIS F.1-31	All roads built for the project on the Minidoka RD would be closed following construction. Roads needed for transmission line maintenance would be reduced to an 8-foot-wide vegetated path that would be blocked and closed to public use. All other roads would be decommissioned and the vegetation restored.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	We are very disappointed, disturbed, and alarmed that BLM F.O. management and proponents arbitrarily decided without public knowledge, input, or regard; to change the route, in segment 9, and take the line along rim of and across the Salmon Falls Creek Canyon, at Lily Grade. We believe this is highly unethical, as we understand it, it's not in accordance with NEPA and possibly illegal.	This was not an arbitrary change. The Draft EIS is just that, a draft. It is standard practice to collect information between draft and final, including public and agency comments, and make adjustments to the alternatives. These are presented to the public in the FEIS for comment. The reason for the change is presented in Section 1.1.1 of the FEIS. We believe that the analysis in the

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				Lands and Recreation section (3.17) is very clear. Figure 3.17-10 clearly shows Alternative 9C and the Lilly Grade crossing at a scale of one-half inch to the mile. The text associated with this figure explains the issue.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	This is a golden eagle nest site and though BLM has allowed it to be grossly degraded by livestock it still has all the unique features that made it a ACEC. This area on both sides of is designated as a ACEC the canyon is a Outstanding Natural Area, eligible WSR, and SRMA. All for good reason, the designation has little to do with "recreation" and everything to do with wildlife and visual resources. It should be managed as a destination for people to come and enjoy because it 's close to town.	See Section 3.10 for effects to raptors, including golden eagles. All construction would comply with the Bald and Golden Eagle Protection Act. Construction would be prohibited during the nesting season, as required by environmental protection measure WILD-9; also see WILD-1. There is no reason to believe that the proposed Project would have a significant adverse effect on the golden eagle. In fact, there is considerable research indicating that transmission towers improve hunting by providing roosts.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	There was a 3-year Red Willow/Prairie Falcon Audubon monthly bird count done in the Burley BLM F.O. allotments including the Project area. It is detailed and site- specific. More then one hundred species of birds were found including BLM sensitive species and sagebrush and grassland obligate species. Again, We believe this change is highly unethical and does not follow the NEPA process.	Your comment is noted. The project is in full compliance with NEPA.
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	The proponents were aware that this area was designated as a ACEC and eligible WSA, As stated in the FEIS, "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. An alternative crossing of the river (Alternative 9C) would avoid the eligible WSR and the ACEC (emphasis added). The alignment for Segment 9 was adjusted to cross just north of the road crossing at Lilly Grade and adjacent to an existing distribution line. The Burley FO has stated that the WSR classification at this location is Recreational" and 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 F.1-31 The FEIS states, the canyon itself is also managed as an ACEC, Outstanding Natural Area, eligible WSR, and SRMA. Proponent are aware of these important designations and choose to ignore them. • Interested public was not given this information; there was already a route laid out in the DEIS . A route change should be given to the public before the final EIS. This does not follow NEPA. • 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. Why? It's also very difficult to assess 9c on the map in the handouts, and it's not included on the map in FEIS appendix F.1-34. • When given the chance to go through or around a area designated for protection. BLM Burley FO manager and proponents chose to go through it without public input or regard. Why? • "Congress mandated the designation of ACECs through the Federal Land Policy and Management Act (FLPMA) to manage	The comment is correct in saying the route was moved out of the eligible Wild portion of the river to an area near the Lilly Grade Road and an existing low-voltage transmission line. This is documented in the FEIS, including in Sections 1.1.1 and 3.17, as well as in Appendix F-1. This was presented to the public for comment as NEPA requires during the 60-day public comment period on the FEIS. There is nothing odd or unethical about this; it is a normal part of the NEPA process to make changes between draft and final. As the comment notes, "The FEIS states, the canyon itself is also managed as an ACEC, Outstanding Natural Area, eligible WSR, and SRMA," and the FEIS proposed plan amendments for crossing the canyon. The BLM considered other routes but determined that this route would have the least adverse effect on the full range of resources, including irrigated agricultural lands and the State Park, which would have been adversely impacted by other routes. Figure 3.17-10 clearly shows Alternative 9C and the Lilly Grade crossing. The text associated with this figure explains the issue. We are sorry that you had trouble viewing the map on the web site, however the analysis in the Lands and Recreation section (3.17) is very clear. While visual impacts cannot be fully avoided, the FEIS includes measures that minimize the effects to the extent practicable; also, the route across the canyon was sited near a paved two-lane road and a low-voltage powerline to confine impacts to a limited area. Refer to the analysis in Appendix G-1.

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			<p>areas containing truly unique and significant resource values” and “WSAs are managed to a “non-impairment” standard that excludes surface disturbing activities and permanent structures that would diminish the areas’ natural character...” “ACEC designations highlight significant resources or hazards where special management measures are needed to prevent irreparable damage. ” We don't believe this designation can be written off so easily or under highhandedly. In the FEIS the proponents state:</p> <p>3.7.1 Purpose and Need to Amend the Twin Falls MFP The Project's Preferred Route 9 and Route Alternatives 9A and 9B would cross through areas managed by the Twin Falls MFP. The route locations were selected to comply with WECC requirements and to protect significant resources to the greatest extent feasible. These include, but are not limited to, TES species, sensitive lands, cultural resources, and visual resources”(emphasis added). To us, this route change doesn't protect “significant resources” to any extent! Twin Falls MFP direction for Visual Resources gives explicit instructions on how the ACEC should be managed. PFA included the importance of the ACEC in our comments on grazing permits in the allotments in and around the project area which were never finalized to our knowledge. BLM has ignored it's own directives. This area along the rim of the canyon has been grossly mismanaged and is degraded but still has most of the elements that makes it a ACEC and has great potential for future restoration. Permanently degrading it with towers and more roads would be a disgrace and again would show BLM's commitment to big business over public interest because there are better alternatives. Again, we believe many of the negative impacts throughout the project can”t be mitigated, especially when visual resources in areas such as this are essentially obliterated.</p>	
101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>3.8 Jarbidge RMP FEIS F.1-37: Again, We are very disappointed and alarmed that BLM F.O. management and proponents arbitrarily decided without public knowledge, input, or regard; to change the route, in segment 9, and take the line along rim of and across the Salmon Falls Creek Canyon at Lily Grade. We believe this is highly unethical, not in accordance with NEPA, and possibly illegal. Both sides of the canyon are ACECs and both the Burley and Jarbidge RMP gives explicit direction on how the they should be managed. The canyon itself is also managed as an ACEC, Outstanding Natural Area, eligible WSR, and SRMA. As stated in FEIS “the RMP decisions that are proposed to be amended relate to cultural and visual resources”. How will these resources can be mitigated? We believe they can't be. To us, it is only in the best interest of the proponents to allow these amendments to Jarbidge and Burley's RMPs. This route change is senseless and unnecessary, and can essentially cause irreparable harm natural resources in these designated areas because there are other alternatives already considered across degraded lands.</p>	<p>This was not an arbitrary change. It is standard practice to collect information between draft and final, including public and agency comments, and make adjustments to the alternatives. These are presented to the public in the FEIS for comment. The reason for the change is presented in Section 1.1.1 of the FEIS. Also see the analysis in Section 3.17.</p>

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101015	JULIE RANDELL	NATIONAL AUDUBON SOCIETY- PRAIRIE FALCON SOCIETY	<p>In regards to route change in the Twin Falls MFP after the DEIS, the public was left out of the decision making process, is not in accordance with NEPA and is unethical, and possibly illegal.</p> <p>We believe the change is unnecessary and harmful as the area is designated for protection under FLPMA, as proponents are aware of and had an publicly known alternative already in place. We ask, what will BLM do to remedy this situation?</p> <p>In view of the the many reasons stated above we ask BLM to not grant the amendments and to keep the Gateway Transmission Line to the designated energy corridors with little exception.</p> <p>Instead of allowing private interests to destroy public lands piecemeal, we would also ask BLM to vigorously protect their Field Offices” RMPs that protect and regulate for true sustainable multiple use of our natural resources on public lands now and in the future,</p>	The public was not left out of the change. The change to this and other routes was presented to the public for comment (i.e., the 60-day comment period following publication of the FEIS).
101016	MATT MEAD		<p>The EIS has been under environmental review for a number of years. No inconsistencies between the FEIS and state plans or policies were identified. This alternative meets the needs of Rocky Mountain Power while protecting the interests of Wyoming. I appreciate the work of the Bureau of Land Management and cooperators in coming to this result.</p>	Your support is noted.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	<p>The Board of County Commissioners of Lincoln County has determined that the Gateway West Transmission Line Project - Proposed Land Use Plan Amendments and Final Environmental Impact Statement (FEIS) conflicts in several material respects with the county's land use plan and zoning. The Bureau of Land Management (BLM) selected a route through Lincoln County that brings the transmission line within 250 feet of residences and residential lot lines and, possibly within the city limits in Cokeville, Wyoming. Lincoln County recommended to BLM two ways to resolve the conflict: (1) bury the transmission line for about eight miles or (2) revise the proposed route to exclude homes in and near Cokeville. BLM unfortunately did neither, and this left Lincoln County with no choice but to protest the Gateway West FEIS, because the BLM decision will greatly devalue the affected land and homes.</p>	Please refer to the BLM response to the County's protest letter (Appendix K to the ROD). The BLM is continuing to work with the County on routing.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	<p>Consistency with Local Land Use Plans and Policies Wyoming law confers broad authority on the counties to regulate the construction of buildings and facilities on unincorporated land within the county. The Counties have broad authority to protect the public health and welfare of county residents and this includes providing for transportation, land use and zoning, building codes, and assuring a supply of water for agriculture, municipal, and industrial purposes. Wyo. Stat. §§18-5-102, 18-5-105, 18-5-201 (zoning commission authority under board of county commissioners). Lincoln County has adopted land use plans and policies addressing various public land uses, including transmission lines and energy development. Ex. I, Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy (Lincoln County Plan),</p>	The BLM recognizes that the County has authority over unincorporated private lands in the county. The BLM has coordinated closely with the County and other local governments over several years, as documented in Chapter 5 of the FEIS and in the notes from bi-weekly meetings. As the comment states, the Secretary has the authority to determine when meeting federal law and the purposes of FLPMA requires a decision that is not consistent with local plans. Routing the line over historic trails and gravesites and through core sage-grouse habitat outside a corridor when other options are available would not meet federal policy as directed by FLPMA. The BLM worked with the County after the FEIS comment period to find a solution that might meet all

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			<p>Appendix 3 (Nov. 16, 2006). Lincoln County has jurisdiction over lands in Wyoming impacted by the alternatives analyzed in the Gateway West Transmission Line Project FEIS. The BLM's Preferred Alternative is inconsistent with local government land use plans in violation of the Federal Land Policy and Management Act (FLPMA). BLM failed to resolve the inconsistencies even though the local government plans are not contrary to federal law, and FLPMA requires BLM to make every effort to resolve such inconsistencies. BLM Comment Response Doc. at 35-37, I 55; 2012 OSTs PFEIS at App. M-3 to M-4. Pursuant to FLPMA, BLM must ensure that "land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act." 43 U.S.C. § 1712(c)(9) (emphasis added). Further, FLPMA requires BLM to coordinate with the land use planning and management programs of the States and local governments./d. Because the majority of the land in Lincoln County is federally owned, management of these lands directly impacts the economies, the customs and culture, and the health and safety of the citizens of Lincoln County. Ex.1, Lincoln County Plan at 3-4; Ex. 3.</p> <p>In order to enhance these values and provide for the general well-being of its citizens as well as respect private property rights, the County favored Alternative 4A, because it followed an existing transmission line corridor and minimized the adverse impacts to private land. Ex. 5, CLG Comments on Potential Alternative Routes at 4 (Sept. 4, 2009). As originally contemplated, this route would reduce surface disturbance and adverse impacts to the environment and private property. Most importantly, the proposed route would also reduce impacts to private land values when feasible routes exist on public lands or existing utility corridors. This loss of property values primarily affects residents, whose homes are their primary asset. The County opposes any proposal that fails to conform to the County planning and zoning criteria and further fails compensate either the county and/or its residents for the lost property taxes and reduced land values. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-37 (Nov. 16, 2006) Lincoln County has been a cooperating agency throughout the EIS process. Gateway West FEIS at ES-2. Lincoln County raised all legal and factual arguments submitted in comments internally as a cooperating agency and during the scoping period, on the proposed alternative routes, on the Gateway West Transmission Line Project Draft EIS (DEIS), and on the Administrative FEIS (FEIS). See Ex. 5, CLG Comments on Potential Alternative Routes (Sept. 4, 2009), CLG Supplemental Comments on Revised Siting (March 29, 2010); Ex. 6, CLG Comments on DEIS (Oct. 28, 2011); Ex. 7, CLG Comments on FEIS (Nov. 9, 2012). Further, we expressed our concerns regarding the alternative routes and land use plan amendments in submitted</p>	<p>stakeholders' needs. Crossing core sage-grouse habitat outside the Governor's corridor would need State approval. As required by the Governor's policy, the existing disturbance and the additional Project disturbance cannot exceed 5 percent in a core area outside the designated corridors. A disturbance calculation was completed for the County's proposed reroute in July 2013. The existing disturbance was over 23 percent. Finding a solution that everyone can support (or be neutral to) has been a difficult process.</p>

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			<p>comments as a cooperator during the cooperator meetings and before the release of the DEIS. As soon as it became apparent that the alternative routes selected by BLM for the Gateway West Transmission Line project could impact a significant amount of private land and residential areas, the County objected to the disproportionate impacts to private lands. Lincoln County argued that adverse impacts on private lands should only occur as a last resort compared to impacts on public lands and that BLM must fully disclose any eminent domain or condemnation issues through the EIS process. Ex. 5, CLG Comments on Alternative Routes at 4; see also Ex. 7, CLG Comments on FEIS at 1-6 (proposing mitigation methods and alternative routes to minimize impact to private lands and residential areas). Impacts to private land require County approval and landowner consent. Id. The County has consistently requested that BLM minimize its impact on private lands for federal projects. Ex. 5, CLG Comments on Potential Alternative Routes at 4; Ex. 6, CLG Comments on DEIS at I-3, 9-I1; Ex. 7, CLG Comments on FEIS. This protects the health and safety of its citizens, protects property values and the tax base of the county, and minimizes impacts to the environment and wildlife, such as sage grouse. Ex. I, Lincoln County Plan at 3-4 (objectives of the Lincoln County Public Lands Policy). Further, the County works with BLM to preserve private property rights and values for its citizens and minimize impacts by public land use decisions. See Ex. I, at 3-IO, 3-28; Ex. 2, at 2.5, 2.10, 8.1; Ex. 3, at 13; Ex. 4, at 19-23.</p>	
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	<p>Public Zone The Gateway West Transmission Line Project falls within several different Lincoln County primary and overlay zones. The Public Zone recognizes areas owned/administered by the federal government, the State of Wyoming, and Lincoln County. The purpose of the Public Zone is to provide for land uses consistent with historical uses. (Lincoln County Land Use Regulations, Chapter 1, Page 2). No structure is to be built or used, except in conformity with County regulations setting forth the zones in which the building or structure is located. For this reason, Lincoln County recommended that the proposed route follow as closely as possible existing lines, with structures of similar design and height. Ex. 5, CLG Comments on Potential Alternative Routes at 4. The BLM Proposed Alternative deviates from existing/historic linear features and create Greenfield routes across miles of coal and gas fields, crucial big game winter range, sage-grouse core areas, proposed ACEC's, raptor nests, historic trails and other constraints. Most of the area traversed by the proposed routes is undeveloped (compared to the area crossed by the existing transmission lines). The impacts to most natural resources are expected to be significantly higher compared to building the transmission line adjacent to existing linear features. The impacts to nearly all natural resources would be higher compared to constructing along the existing transmission lines.</p>	<p>The Preferred Route in Lincoln County closely follows the existing transmission lines, separated as needed to meet reliability requirements. The line used for analysis deviates slightly from the existing lines near Cokeville to provide a better crossing of the highway. The exact crossing, which is on private land, is up to the County and State to determine, not the BLM. The BLM only makes decisions for federal land. If the State and County determine that the new line should be close to the existing lines on private land, they can decide this through the permitting process.</p>

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101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	Airport Overlay Zone The purpose of the Airport Overlay Zone is to ensure the policies of the Federal Aviation Administration are implemented with regard to the height of structures and certain land uses in close proximity to the Afton, Cokeville, and Kemmerer Airports. (Lincoln County Land Use Regulations, Chapter 1, Page 3). Lincoln County recognizes the importance of maintaining the long-term operation of airports within the county by enforcing FAA regulations concerning development around airports. (Lincoln County Comprehensive Plan, IX. Transportation Goal A, Objectives 2) The BLM's Preferred Alternative and Alternative 4C would cross the Cokeville Airport Overlay Zone and would be subject to height restrictions. Since the tower height exceeds the 150 foot horizontal ceiling limit, Lincoln County asked that the transmission line be buried or located elsewhere. BLM failed to consider either the mitigation measure or the alternative route in violation of both FLPMA and NEPA. BLM only considered and rejected analyzing the technical and economic feasibility of burying the Gateway West Transmission Lines for the entire distance of the project, approximately 990 miles. See Gateway West FEIS, Sec. 2.6.3.5, at 2-138 (admitting that burying lines is justifiable for limited distances, which is exactly what the County proposed but BLM failed to analyze). The County proposed burying the line for eight miles near Cokeville, Wyoming, or less than 1% of the total distance of the Gateway West Project. Ex. 7, at 1-6.	The FEIS did consider the Kemmerer and Cokeville Airports in siting. The BLM's Preferred Route is on the opposite side of the three Bridger transmission lines from the Cokeville Airport, and it is 1,500 feet north of those lines. The Kemmerer Airport is several miles to the south, and on the opposite side of the Bridger lines from the Preferred Route. The Afton Airport is many miles to the north of the Gateway West Project. Burying the lines is addressed in Section 2.6 of the FEIS. The alternative route the County recommends would cross approximately 7 miles of sage-grouse core area outside the Governor's corridor and is not consistent with state policy. A disturbance calculation was completed for this area in July 2013. The existing disturbance was over 23 percent. The Governor's order limits disturbance to 5 percent in core areas outside a corridor. Therefore, this alternative was not considered.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	Multiple Use Community Overlay Zone The Multiple Use Community Overlay Zone is comprised of land mostly owned by the federal government, the state government, and the county. There are some small pockets of private lands. This Community Area contains the Fossil Butte National Monument and Cokeville Meadows National Wildlife Refuge. The public lands of this Community Plan Area are to be used and managed with the multiple use concept, in harmony with the local economies. Any updating of National Forest and Bureau of Land Management Plans in this Community Plan Area shall include human uses and human economies within any ecosystem analysis rather than exclude human uses. (Lincoln County Land Use Regulations, Chapter 1, Pages 8- 9)	County plans do not override federal laws and policy. Federal land use plans determine use on federal lands; these plans consider human uses and economic effects on local communities. Some federal areas are managed for multiple use, others for a predominate use (e.g., wilderness study areas, national monuments, and wildlife refuges). Nearly all lands are open to human use.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	The location and lack of mitigation for the preferred alternative analyzed in the Land Use Plan Amendments adversely and directly affect Lincoln County. The preferred alternative will reduce land values and county tax receipts due to the fact that it will be constructed near residences in Cokeville Wyoming.	The effect on land values is discussed in Section 3.4.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	BLM made a choice to sacrifice land values of citizens of Lincoln County for the ostensible reason of not placing the transmission line on public lands due to alleged conflicts with sage grouse core areas and now obliterated segments of the Sublette Cutoff trail.	The line was sited to be consistent with the Governor's sage-grouse corridor in core habitat. We recognize that the County does not agree with the BLM on the importance of some historic trails identified in the RMP.

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101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	The revised location of the transmission line directly contradicts the Lincoln County Land Use Plan and also conflicts with local zoning laws, because the proposed transmission line runs through residential subdivisions. Notwithstanding BLM's mandate that it coordinate and resolve such conflicts, BLM has ignored its obligation to reconcile conflicts and conform to local land use planning. BLM instead proceeded to place the transmission line nearly overhead of residential homes, yards, and adjacent barns and other buildings, at a distance of less than 250 feet away, with resulting loss of land value. Depending on the exact final location, the transmission line may even cross through the town limits of Cokeville, Wyoming.	The BLM has not placed the line directly over people's houses. As stated many times in the EIS, the line analyzed in the FEIS is not the final design. The final design, as permitted by the state and county, will determine the location on private land. The BLM has coordinated with the state and county throughout the project, as documented in Chapter 5 and in the meeting notes from bi-weekly meetings over several years. The BLM is not required to follow County direction that is not consistent with federal policy and law in managing federal lands, only to coordinate with local governments, which it has done (see Chapter 5). Siting the line on private land is up to the state and county governments, not the BLM.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	<p>The Lincoln County Land Use Regulations state that no conditional use permit shall be recommended to be granted unless the Commission finds it will not substantially impair the appropriate use of neighboring property; and will serve the public need, convenience and welfare. The use must be designed to be compatible with adjacent land uses and the area of its location. Lincoln County Land Use Regulations, Permit Compliance, Chapter 3, Page 4. The County's objectives and subsequent policies shall be the basis for public land management planning that will further define this policy. • To ensure management decisions are accomplished with full participation of the County and supported by tested and true scientific data. Decisions shall fully analyze and disclose impacts on the Lincoln County economy, tax base, culture, heritage, and life styles and rights of area residents. • To mitigate and compensate for impacts to the County and its residents. If action results in a taking, all applicable law must be applied.</p> <p>• To ensure public and private access and rights-of-way for utilities and transportation of people and products on and across public lands. Access must be provided to merit such needs. The County recommended that the Gateway West Transmission Line follow the existing 345-kV transmission lines from Jim Bridger Power Plant for most of Segment 4. The County, however, supported a revision in Segment 4 and stated that the route must avoid privately owned lands to the extent possible, whether it be private lands within the checkerboard or residential areas near Cokeville. Instead, BLM deviated from the existing transmission line route near Cokeville with a preferred route that disproportionately affects residential and private lands. The proposed route deviates to the north from the existing transmission line route by a distance much more than the County anticipated. This deviation results in the transmission line running very close to residential areas. The revised route will also have greater surface disturbance and will adversely affect property values. Construction and operation will interfere with the landowners' peace and enjoyment of their homes, which in most cases, represents their most valuable asset.</p>	The Preferred Route in Lincoln County closely follows the existing transmission lines, separated as needed to meet reliability requirements. The line used for analysis deviates from the existing lines near Cokeville to provide a better crossing of the highway. The exact crossing, which is on private land, is up to the County and State to determine, not the BLM. The BLM only makes decisions for federal land. If the State and County determine that the new line should be closer to the existing lines on private land, they can decide this through the State permitting process. It is up to the state to determine mitigation for adverse impacts to landowners and residents on private land through the WIA, not the BLM.

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			PageS The adverse impacts on private lands are unnecessary, because the route could have been located away from residences. BLM failed to consider any effective mitigation measures proposed by the County, when it ignored recommendations to bury the transmission line for a mere eight miles near Cokeville, Wyoming in order to be consistent with the county plan. Ex. 7, CLG Comments on FEIS at 2-4.	
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	BLM justifies the deviation north of the existing transmission lines, which unnecessarily impacts private lands and residential areas, by stating that it provides a better crossing of U.S. Highway 30 and the Bear River and lessens impacts on wetlands. Gateway West FEIS at 2-43. However, BLM does not explain why these issues support contradicting the local government land use plans or diminishing land values so as to affect a partial taking. Nor does BLM address whether or how the project proponent will secure rights-of-way across the private lands. The omission of these issues renders the analysis of the FEIS deficient and also demonstrates that the proposed decision violates FLPMA's mandate that land use plans (and amendments) be consistent with those of local governments to the extent practical and consistent with federal law. 43 U.S.C. §1712(c)(9). No federal law directs that rights-of-way be granted on private lands rather than federal nor are the mitigation measures proposed by Lincoln County impractical. Indeed they are quite practical.	The line used for analysis deviates from the existing lines near Cokeville to provide a better crossing of the highway. This is based on indicative engineering, not final design. The exact crossing, which is on private land, is up to the County and State to determine, not the BLM. The BLM only makes decisions for federal land. If the State and County determine that the new line should be closer to the existing lines on private land, they can decide this through the permitting process. The BLM has never indicated that it has authority to grant a ROW on private or state lands. In fact, it has repeatedly stated the opposite. Section 3.17.1.3 of the FEIS discusses the process for condemnation in Wyoming. The BLM has also repeatedly stated that the lines in the FEIS are based on indicative engineering and will be adjusted based on the final design. The BLM has an obligation under federal law to coordinate with local governments. This does not mean that federal land management plans must follow county planning direction. The project record demonstrates that the BLM has coordinated with the state and county on this project, and continues to do so.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	Water Resources In our seeping comments, the Board of County Commissioners asked that the Gateway West Transmission Line be located on the north side of this corridor to reduce conflict with the proposed Sublette Reservoir near Cokeville. In an effort to demonstrate its commitment to ongoing cooperation with BLM, the Operators revised the proposed routing to address concerns raised about the location of the transmission line. None of the revised modifications, however, addressed our concerns. While the Plan of Development mentions that the "alignment between mile 107.7 and Dempsey Basin (mile 114) was established to avoid historic trail segments and a planned reservoir expansion," Gateway POD at 13, it is impossible to discern from the Segment 4 map whether the location was actually revised to respond to our specific routing request. The BLM, therefore, must clearly state that the proposed route has been modified to avoid the site of the proposed water storage reservoir.	As stated previously, the line shown on the maps in the EIS is based on indicative engineering, not final design. The final design will need to be approved by the Wyoming Siting Authority prior to any construction on private land (and by the BLM prior to construction on federal lands). As stated in the FEIS, the BLM only grants a ROW on federal lands that it manages, not on private land. As stated in the FEIS, siting the route on private land is a local and state government issue.
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS	The Lincoln County Public Lands Policy states: • Agency actions must analyze impacts on facilities such as dams, reservoirs, delivery systems, monitoring facilities, etc., located on or downstream from land covered by any water related proposal.	The fact that the EIS does not include these items required by the county plan is noted. The analysis meets NEPA requirements. Historic waterworks in Wyoming (and Idaho), including canals

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		(WY)	<ul style="list-style-type: none"> All potential reservoir sites and delivery system corridors shall be protected from any federal or state action that would inhibit future use. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-37. <p>The FEIS failed to analyze impacts of the preferred route on the proposed Sublette Creek Reservoir location south and east of Cokeville. The site is currently being considered at a level III study. Depending on location, nearly 5000+/- feet of transmission line may cross the reservoir. In order to be consistent with local land use policy, Lincoln County asked the BLM to consider siting the transmission lines away from the proposed reservoir location. This has yet to be analyzed in the agency actions.</p> <p>The FEIS does analyze several Wyoming Waterworks projects, such as the Seedskadee Project and the Rawlins Wood Pipeline. The Bear River has the earliest water rights in the state of Wyoming, many of which precede statehood. The proposed route would cross nearly a dozen canals and ditches with territorial water rights that have not been evaluated for listing but would certainly be assumed NRHP eligible. These include the Forgeon (1885) Collett (1886) Mau (1886) Stoffers (1882) and Stoner (1882) canals, among others. These were not considered in the Summary of Cultural Resource Visual Impact Analysis by Segment and Resource and so fail to meet Lincoln County policy.</p>	<p>and ditches, are treated as a class of resources and discussed generally throughout Section 3.3 (Cultural Resources) of the EIS. The Rawlins Wood Pipeline, in Segment 3, is mentioned specifically as an example of such historic features. Other historic canals and ditches, if directly affected by any of the Preferred or Alternative Routes, will be discussed in the Class III (intensive pedestrian) survey reports, which are now in preparation. Section 3.3 explicitly addresses indirect effects on historic trails, those resources for which visual setting is an important factor for NRHP eligibility. Visual effects to other linear resources, such as waterworks, were not considered in this discussion because visual setting generally does not contribute the NRHP eligibility of these class of resources. That is, historic canals and ditches are usually evaluated as eligible for listing in the NRHP for aspects other than visual setting.</p>
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	<p>Cultural and Heritage Resources</p> <p>The National Historic Preservation Act (NHPA) is the basis for cultural and historical preservation and defines federal agency's responsibility for protection and preservation of County Cultural and heritage resources. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-37. The protective measures adopted in the Kemmerer RMP are based on BLM's authority under the NHPA. The FEIS incorrectly assumes that these resources could be on the National Historic Register without performing the integrity analysis required by the National Park Service (NPS). How to Apply the National Register Criteria for Evaluation, National Register Bulletin 51 (1995), p. 44 (NRB #51). Even if a resource has been deemed eligible, unless listed, it fails to meet County land use policies for protection and, as explained below, the trail segments in the disputed area have lost the requisite integrity and no longer meet the criteria for protection. Lincoln County objects to the FEIS classification of the trail segments as Class I or 2. Virtually all of the affected trail segments have lost their physical integrity and, thus, would not meet the NPS for listing on the National Historic Register. The KFO RMP did not apply this level of analysis and thus the FEIS needs to correct the premise that NHPA can be invoked regardless of the lack of physical integrity. Under the NPS guidelines for integrity, these trail segments should not be the basis for additional mitigation measures or any recognized protection.</p>	<p>The BLM recognizes that the County has a different view on the integrity of some the trail segments than the BLM. Refer to the Kemmerer RMP for BLM direction on trail protection. County policy does not override federal laws and policy. The BLM has an obligation to protect historic trails. Section 3.3 of the FEIS details the methodology used to assess impacts to cultural and historic resources, including historic trails. The FEIS analysis is based on extensive field work, literature review, and follows all applicable federal laws and policies. The BLM has coordinated with the state and county throughout the Project, as documented in Chapter 5 and in the meeting notes from bi-weekly meetings over several years. The BLM is not required to follow county direction in managing federal lands, only to coordinate with local governments and provide opportunities for public comment, which it has done. Siting the line on private land is up to the State and County governments, not the BLM.</p>

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			<p>Lincoln County has provided comments based on actual accounts of the condition of the historic trail segments near Cokeville, Wyoming, including the Sublette Cutoff, that such segments no longer possess the physical integrity necessary to be eligible for designation as National Historic Trails. Ex. 6, CLG Comments on DEIS at 5-11; Ex. 7, CLG Comments on FEIS at 6-10. As such, BLM restrictions may not be used to limit development near trails no longer exhibiting the physical integrity necessary to meet the NPS criteria for the National Historic Register or to be designated National Historic Trails. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-37 (Nov. 16, 2006). The physical features must "define both why a property is significant and when it was significant." Id. p. 46. Moreover, it must retain its essential physical character. Id. When it is lost through development or the mere passage of time, NHPA criteria no longer mandate or permit imposition of restrictions to protect what is no longer physically there.</p> <p>The BLM instead imposed historic trail protections without determining whether the trail features warrant NHPA protection. Sites and trails will be allocated to other resource uses based on their natural and relative preservation value. Such use allocation must be based on cultural resources, not areas of land. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-37 (emphasis added).</p> <p>Most of the work in the Gateway West FEIS has been done internally and without regard to the fact that the trail segments cross the Checkerboard or are on private land. These federal protections necessarily push those impacts onto private lands along waterways where the Oregon and California trails were located. The Lincoln County plan does not distinguish between cultural resources on private and federal lands. All management decisions providing for the protection of cultural resources must be based on the quality and significance of that particular resource, not where it is located. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-37.</p> <p>Lincoln County policy and the National Historic Trails Act require landowner and local government involvement and cooperation, which has not occurred. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-37; 16 U.S.C. §1244(b). The FEIS interpretation of the NHPA and the Executive Order circumvent the statutory limits that otherwise apply to historic trail protection. It also creates significant land use conflicts and management issues.</p>	
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS	<p>Visual Resources</p> <p>The BLM improperly assigned VRM Class II designations without adjusting the VRM Class to the existing land uses, such as existing transmission lines, rather than having the VRM class reflect the</p>	Please refer to Section 3.2 for a detailed discussion of how the VRM process was followed. Refer to Appendix G for a detailed analysis of scenery associated with plan amendments, including photo simulations showing the expected project impacts. Also

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		(WY)	<p>permitted land uses.</p> <p>VRM classifications should be narrowly tailored to reflect previous and appropriate land uses. Southern Utah Wilderness Association, 144 IBLA 70, 85 (1998) citing DM 8410 V.B. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-52. These classifications also contradict BLM visual resource management policy. The Kemmerer RMP imposed VRM Class II along historic trail segments to protect cultural resources without determining whether the trail segments had retained their integrity. A blanket VRM Class II cannot be imposed absent documentation of significance and sensitivity. This evaluation does not occur until the project level. The FEIS failed, however, to conduct its own evaluation of significance and sensitivity. As explained above, if the trail segments are now invisible or not physically evident, they are neither significant nor sensitive. Thus the FEIS cannot apply VRM Class II measures to protect an historic trail segment until it has done the site-specific analysis.</p> <p>This contradiction should also be addressed in the checkerboard lands and other areas where much or most of the land is owned by the State or private individuals. For example, the southern and central VRM Class II areas cover areas which are more than half private land. The County opposes the use of VRM classification that will impair or impede land uses on private and state lands. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-52 (Nov. 16, 2006). Putting most of the land north of Highway 30 (lumping) also fails to meet the VRM classification criteria. This does not conform to County policy, since it applies a Class II VRM objective to areas without regard to the resource allocation, let alone one consistent with preservation of view scape. Lincoln County, Wyoming, Comprehensive Plan, Public Lands Policy at Appendices 3-52 (Nov. 16, 2006).</p>	<p>see Appendix E includes additional photo simulations. The BLM has followed all applicable federal laws and policies, and has stated that it has no authority for siting/permitting decisions on private lands.</p>
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	<p>Based on the foregoing, Lincoln County requests that the Governor conclude that the BLM's Proposed Land Use Plan Amendments and FEIS for the Gateway West Transmission Line Project is not consistent with the Lincoln County Plan and that BLM must undertake the following changes to meet its consistency obligation:</p> <ol style="list-style-type: none"> 1. Supplement the FEIS to add the burial of the transmission line as it passes near Cokeville; or in the alternative; 2. Supplement the FEIS to alter the proposed route near Cokeville by adopting the re-route jointly proposed by the Town of Cokeville and Lincoln County that would avoid human core habitats; or in the alternative; 3. Adopt Alternative 4B/4D as the preferred alternative, which will avoid human habitats and residential areas; 4. Adjust the VRM Classifications to reflect the underlying land use 	<p>Your request to the Governor is noted. The Governor's comments on the FEIS do not include these items. The BLM has continued to work with local stakeholders and the State to find a consensus route (see the analysis attached to the ROD).</p>

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			resource allocations; 5. Manage NHTs to only protect those segments which currently exhibit physical characteristics of an historic trail and revise the Kemmerer RMP VRM classes as appropriate; and 6. Designate a 1-Mile Utility Corridor on whichever route is chosen to resolve issues of NHTs, NHT Viewsheds, and VRMs for the Gateway West project and other future transmission line projects.	
101017	PAUL C. JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	Based on these considerations, the County proposed mitigating the impacts to private lands and residential areas along the proposed route by burying the transmission lines for approximately eight miles or in the alternative, connecting the proposed route with alternative route 4C south of Cokeville to avoid private residential areas. Ex. 7, CLG Comments on FEIS at 1-6. BLM failed to consider or even respond to either of these proposals. Gateway West FEIS at App. L 189-193. Yet, the BLM did consider to proposals made by Fossil Butte National Monument and Cokeville Meadows National Wildlife Refuge to avoid their viewsheds.	The BLM considered burying the line (see section 2.6.3.1 of the FEIS) as well as many other routing options (see Chapter 2). The BLM has worked cooperatively with Lincoln County and the State to find a route that meets everyone's needs.
101017	PAUL C. JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	Anticipating BLM hostility to the burial option and in consideration of the project proponent potentially rejecting the burying mitigation measure, the County also suggested moving the line to the south of the existing route to again avoid adversely affecting the airport and residential areas. /d. This proposed route also would be located south of the proposed Sublette Creek Reservoir site identified during scoping. BLM failed to consider either the mitigation measure or the alternative route in violation of both FLPMA and NEPA. BLM only considered and rejected analyzing the technical and economic feasibility of burying the Gateway West Transmission Lines for the entire distance of the project, approximately 990 miles. See Gateway West FEIS, Sec. 2.6.3.5, at 2-138 (admitting that burying lines is justifiable for limited distances, which is exactly what the County proposed but BLM failed to analyze). The County proposed burying the line for eight miles near Cokeville, Wyoming, or less than 1% of the total distance of the Gateway West Project. Ex. 7, at 1-6. The second alternative proposed by the County would direct the Gateway West Transmission Line from the proposed route and connect with route alternative 4C south of Cokeville. Ex. 7, CLG Comments on FEIS at 3-4. However, BLM failed to analyze or even respond to this alternative proposed in the FEIS comments even though the alternative was reasonable, technically and economically feasible, resulted in fewer impacts, and accomplished the intended purpose of the Gateway West Transmission Line Project. See Gateway West FEIS at App. L 189-93 (no response to the suggested route alternative); see also S. Utah Wilderness Alliance (SUWA), 182 IBLA 377, 391 (2012) (stating the standard for considering a proposed alternative). These mitigation measures and alternatives should have been considered and analyzed pursuant to FLPMA and NEPA. The	The EIS addresses burying the transmission line in Section 2.6.3 of the FEIS. The additional cost and disturbance identified in that section would apply to an eight-mile section, as well as to a longer segment. Placing a 500 kV line underground would cost <u>approximately</u> 7 to 12 times as much as building an overhead line. Based on an average above ground cost of \$2 million per mile, placing an 8-mile section underground would cost between \$112 and \$208 million compared to \$16 million for an above ground line. This cost would be passed on to ratepayers, assuming the state regulators would approve this unusual alternative. In addition, burying the line requires digging a continuous trench, requiring at least a 30-foot wide disturbance area (see Figure 2.6-2 in the FEIS). Installations similar to substations would be required at each end of the underground section, each of these would require about 4 acres. The reliability of an underground 500 kV line over the life of the Gateway West project is unproven. The BLM has worked cooperatively with Lincoln County and the state and counties to find a route that meets everyone's needs. The proposal to connect to 4C involved crossing Core habitat outside the Governor's corridor. Remaining within the governor's sage-grouse corridor was a primary driver of the route in Wyoming. Routing through core habitat outside the Governor's corridor in order to avoid private land was not consistent with the governor's executive order. Placing the line on the south side of the three existing lines on federal land would impact cultural resources (refer to Section 3.3) as well as other resources that the BLM is required to consider. The BLM appreciates the concern of local residents and is working with local stakeholders and the

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			County provided BLM with a reasonable mitigation measure for the preferred alternative and a reasonable alternative in its comments on the FEIS in order to be consistent with the county land use plan and to avoid t harming residences and land values. See Ex. 7, CLG Comments on FEIS at 1-6. The proposal would have reduced the environmental, social and economic impacts of the project on affected private lands and residences near Cokeville and was feasible under the proposed land use plan amendments./d.	Proponents to develop a route that avoids impacts to the City of Cokeville without the added cost, disturbance, and risk of a buried line and that is consistent with other resource requirements (see the analysis report attached to the ROD).
101017	PAUL C JENKINS	LINCOLN COUNTY, BOARD OF COMMISSIONERS (WY)	Regardless of the route selected, BLM must revise the Kemmerer RMP or grant an exception to conform to the current Kemmerer RMP. Because the transmission line is for all practical purposes a permanent structure, and other transmission lines are being proposed, this does not meet the criteria for an exception. Lincoln County recommends designating a corridor for future utility placement since there are two other transmission lines being proposed (TransCanada and Zephyr). Lincoln County has repeatedly asked the BLM to officially designate this route as a corridor. There have been two previous opportunities to do so, during the Kemmerer RMP Revision and during the West-Wide Energy Corridors EIS. Again we request the Kemmerer FO to recognize this as a utility corridor.	The Preferred Route in the Kemmerer area follows three existing transmission lines. It was widely supported in the public and agency comments on the DEIS, including the County's comments. The route is within the Governor's sage-grouse corridor and has less impact on historic trails than other options considered. Refer to Table 2.8-3 of the FEIS for a comparison of resource effects. Designating a one-mile utility corridor on each side of the line was considered in the EIS if either Alternative 4B or Alternative 4D was selected but not for other routes. It is within the authority of the BLM to consider, or not consider, utility corridors when proposing plan amendments.
101018	WALLY JOHNSON		As a result of Sweetwater County's review of this FEIS, the County supports the Bureau of Land Management's (BLM) Preferred Alternative Route across Sweetwater County. To ensure that the selected route addresses the County's socio-economic, permitting and land use concerns, Sweetwater County welcomes the opportunity to work with the BLM, the State of Wyoming and Rocky Mountain Power through the required Wyoming Industrial Siting Council and the Sweetwater County Development Code perm i tting processes.	Your support for the BLM Preferred Alternative is noted.
101018	WALLY JOHNSON		Since Sweetwater County is a neighbor to Lincoln County and both counties are members of the Coalition of Local Governments, Sweetwater suppms the Coalition of Local Government's "PROTEST OF THE PROPOSED LAND USE PLAN AMENDMENTS REGARDING THE GATEWAY WEST TRANSMISSION LINE PROJECT" and strongly encourages the BLM to select a route through Lincoln County that is approved by the Lincoln County Board of County Commissioners. This position is backed by many Sweetwater County residents who work, recreate and own property in Lincoln County.	Please refer to the BLM's official response to the Coalition's protests (Appendix K to the ROD).
101019	LEAH D OSBORN	OWYHEE CITIZENS TASK FORCE	I am writing in support of Segment 9D of the Gateway West Transmission Line in Owyhee County Idaho	Your support is noted.
101019	LEAH D OSBORN	OWYHEE CITIZENS TASK FORCE	I do not support the BLM's Preferred Alternative 9E.	Your opposition is noted.
101020	LEAH D OSBORN		I am writing in support of Segment 9D of the Gateway West Transmission Line in Owyhee County Idaho	Your support is noted.

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101020	LEAH D OSBORN		I do not support the BLM's Preferred Alternative 9E	Your opposition is noted.
101020	LEAH D OSBORN		General Wild Life and Fish , page 3.10-1 , Segment 9. <ul style="list-style-type: none"> • Segment 9: The BLM's Preferred Route is the Proposed Route incorporating Alternative 9E, which was revised to avoid PPH and the community of Murphy (Figure A-11). • BLMs Alternative 9E is within Sage Grouse habitat. The photo below clearly states this. This photo was taken within the corridor on the Alder Creek Road. GPS coordinates. 11T NH 48603, 56414. Thank You, 	The FEIS acknowledges impacts to sage-grouse habitat, as discussed in Section 3.11. Alternative 9E generally avoids preliminary priority habitat (PPH) for sage-grouse but does cross general habitat. Approximately 7 acres of PPH would be impacted due to improvements to existing roads.
101021	MERRI MELDE		I oppose the BLM's preferred route, 9E.	Your opposition is noted.
101021	MERRI MELDE		The adverse effect on sage grouse habitat and ecosystems have already been amply demonstrated	The FEIS acknowledges impacts to sage-grouse habitat, as discussed in Section 3.11. Numerous avoidance, minimization, and mitigation measures have been included in the FEIS to reduce impacts as much as possible.
101021	MERRI MELDE		This route would have maximal impact on the land, soil	Effects to soils are analyzed in Section 3.15 of the FEIS. The FEIS includes avoidance, minimization, and mitigation measures to reduce impacts to soils; see Table 2.7-1).
101021	MERRI MELDE		This route would have maximal impact on the land, soil, flora, fauna	Noted. The FEIS analyzes impacts to resources in Chapter 3.
101021	MERRI MELDE		This route would have maximal impact on the land, soil, flora, fauna and scenery, as has been amply demonstrated	The FEIS analyzes impacts to resources of each alternative in Chapter 3. We do not agree that the analysis indicates that Alternative 9E would have "maximum" effects on these resources. Alternative 9E has greater effects on some resources, less on others, as disclosed in the sections of Chapter 3.
101021	MERRI MELDE		The closer one gets to the Owyhee mountains and the rainshadow they cause, the more fragile the soil becomes. Tearing it up more with trucks, equipment, supplies, roads and a powerline will cause irreversible destruction – once the tenuous plants disappear, the land turns to blowing sand, and the ground can't recover.	Effects to soils are analyzed in Section 3.15 of the FEIS. The FEIS discloses the susceptibility of soils in this area to erosion, soil loss, and drought, and the greater soil disturbance associated with Alternative 9E as compared to the Proponents' Proposed Route. The FEIS includes avoidance, minimization, and mitigation measures to reduce impacts to soils; see Table 2.7-1.
101021	MERRI MELDE		That it will significantly impact both the aesthetics	The FEIS acknowledges that there will be adverse effects on scenery. Visual effects are analyzed in Section 3.2 of the FEIS.
101021	MERRI MELDE		That it will significantly impact both the aesthetics and property values of private property has been amply demonstrated.	Impacts to property values are assessed in Section 3.4 of the FEIS. Alternative 9E is located on public land for approximately 95 percent of its length, crossing 3.3 miles of private land, The same amount of private land as the County's preferred route, Alternative 9D would cross.
101021	MERRI MELDE		How can excess impact in even one of these aspects even be justified when other viable and practical options are available? The argument that power lines have to be separated by a certain distance is bogus. Look at I-84 in Oregon west of where I-82 joins it. There are no less than FIVE large capacity power lines running parallel within a quarter mile of each other.	The issue of separation distances between transmission lines is discussed in detail in Chapter 1 of the FEIS. The BLM has concluded that the minimum separation distances proposed by the Proponents are reasonable and consistent with regional conditions. Refer to Section 1.3.5 for some examples on common line failures that occurred where lines were located close together.

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101021	MERRI MELDE		The rationale that Boise will one day need this extra power has not been factually proven. The lines ARE NOT NECESSARY. Wyoming BLM being the lead on such an impactful project for Idaho is ludicrous. Is the destruction of one more beautiful and pristine and somewhat primitive area necessary in the quest for extra power that has not proven necessary in the first place?	The FEIS documents how the BLM and other agencies have balanced the need for upgrading the electric grid with protecting resources on public lands. Chapter 1 discusses the basis for the federal purpose and need and Proponents' objectives at length.
101021	MERRI MELDE		I support Route 9D as proposed by the Owyhee Task Force The advantage of using this route has already been amply demonstrated – advantages to nesting birds of prey, the minimal impact on the land, soil, flora, fauna and scenery, minimal impact on sagegrouse.	Your support for Alternative 9D is noted.
101021	MERRI MELDE		Roads are already in place, and the soil is not so fragile in this area. Ignoring the studies that have proved that the existing powerlines in the NCA support birds of prey would set a dangerous precedent.	BLM Manual 6220 states: "District and Field Manager shall: Ensure that all activities on Monument and NCA lands are consistent with the relevant designating legislation..." This is the reason that the BLM did not select the Proposed Routes or other alternatives for segments 8 and 9. Our review of the EIS analysis indicated that only the Preferred Routes would meet the intent of the enabling legislation. The BLM considered and complied with the direction under Part E of the manual (Rights-of-Way and Transmission and Utility Corridors) in selecting the preferred route. A point-by-point review of the direction in Part E demonstrates that the BLM complied with this direction. As required by Manual 6220, Part E, subpart 5, the BLM "to the greatest extent possible" located the routes in existing corridors and will require adequate mitigation.
101022	KEN MILLER	SNAKE RIVER ALLIANCE	We appreciate that the FEIS attempts to address the many comments and responses to the DEIS regarding the need for this project, but we do not believe the FEIS adequately addresses those concerns in its revised Chapter 1 (Purpose and Need). BLM responded to our comments to the DEIS on this issue at length. While we appreciate the responses to our comments, we continue to believe the proponents have not satisfactorily addressed this most important component of the proposed project, and that the responses that were provided to our comments and those of many others continue to lack needed specificity.	We received many comments on the WECC criteria, the benefits of conservation and/or local energy production vs. building new lines, and the need for additional transmission lines in Idaho since the DEIS was released. The BLM has no expertise in analyzing the need for transmission lines, the alternatives to upgrading the power grid (such as locally generated electricity from solar panels), or the accuracy of the WECC criteria. The BLM relies on other federal agencies for this. Refer to Chapter 1 for a discussion of the need for the Project.
101022	KEN MILLER	SNAKE RIVER ALLIANCE	In response to our concern that Proponents' Purpose and Need (DEIS 1.3) fails to sufficiently justify this project, BLM responds that: "Additional information on purpose and need has been added to Chapter 1." And in response to our lengthy comments addressing such specifics as whether proponent utilities' IRPs and other plans presented a need for the project, BLM again referred to the additions in Chapter 1. Clearly, the Agency believes it has adequately addressed the concerns raised by the Alliance and myriad other commenters regarding the need for this project. Unfortunately, the revised Chapter 1 fails to adequately address these and related concerns.	As stated in Chapter 1, "the BLM's purpose and need is to respond to an FLPMA ROW application submitted by Idaho Power Company and PacifiCorp to construct, operate, maintain, and decommission the Gateway West transmission line and associated infrastructure on public lands administered by the BLM in compliance with FLPMA, BLM ROW regulations, and other applicable federal laws and policies." It is not up to the BLM to determine if the regulated utilities (the Proponents) are in fact correct in their conclusion that the grid should be upgraded. This is for other agencies to determine. Information on the need for the Project was added to the FEIS including FERC's finding that

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				the Gateway Project “would establish for the first time a backbone of 500 kV transmission lines in PacifiCorp’s Wyoming, Idaho and Utah regions. This would provide a platform for integrating and coordinating future regional and sub-regional electric transmission projects being considered in the Pacific Northwest and the Intermountain West, connection existing and potential generation to loads in an efficient manner, thus reducing the cost of delivered power. Also, the Petition cites the 2006 DOE National Electric Transmission Congestion Study and the 2004 Rocky Mountain Area Transmission Study in stating that that proposed Project will reduce congestion or maintain reliability in the Western Interconnection. Additionally, the project would establish a direct link between PacifiCorp’s east and west control areas, providing numerous benefits including increasing transfer capability, reducing the need for curtailments, and reducing transmission congestion.”
101022	KEN MILLER	SNAKE RIVER ALLIANCE	We agree with BLM that the Proponent Utilities are bound by FERC and other regulators that the utilities are bound to: “Plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers’ energy demands ... but also meet the customer’s peak load demands. Both are important in determining the need for the project.” [1-1] We further take notice of BLM’s position that: “The proposed transmission line is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the proponents’ larger service areas and to the other interconnected systems. The project is principally necessary to serve the proponents’ customers, though other markets may also be served.” [1-1] We also take notice of Idaho Power’s stated objectives for the project (1-14): “Idaho Power is also a public utility under the jurisdiction of the FERC. Idaho Power is obligated to expand its transmission system to provide requested firm transmission service, and to construct and place in service sufficient capacity to reliably deliver resources to network and native load customers as provided in their Open Access Transmission Tariff (OATT) under Sections 15.4 and 28.3 (FERC 2008). Idaho Power’s OATT requires planning for the expansion of the transmission system to provide network integration transmission service that complies with regulatory reliability standards.” Page 1-14 of the FEIS then takes notice of Idaho Power’s 2011 Integrated Resource Plan and its 20-year planning horizon: “The first 10-year period is analyzed first (2011-2020), followed by the second 10-year period (2021-2030). Idaho Power customer needs are largely met in the first 10-year period with the construction of the Boardman to Hemingway transmission line project (B2H). For the second 10-year	Your comments on Idaho Power’s power needs are noted. Refer to Section 1.3 for a discussion of the Proponents’ objectives.

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			<p>period, ten resource portfolios were analyzed in the IRP and some of these portfolios required Gateway West transmission capacity to deliver energy to major load centers in southern Idaho while others did not. The need for Gateway West capacity in each of these portfolios was driven by the assumed locations of the resources in each portfolio.”</p> <p>Much has changed since the above scenario was outlined for purposes of the FEIS. The Agency should know that Idaho Power’s 2011 IRP preferred alternative does not contemplate development of Gateway West, at least not within the time frame projected in the IRP. More important, in the Company’s 2013 IRP, none of the portfolios that have been analyzed or modeled by Idaho Power includes Gateway West, and it is highly unlikely that any new supply side resources proposed by Idaho Power will be resources that would require development of Gateway West for delivery to Idaho Power’s primary load centers in southwest and southern Idaho. All of those portfolios anticipate meeting the Company’s peak demand requirements with other supply side and demand side resources. Idaho Power’s primary needs during the time frames covered by the 2011 and 2013 IRPs are for added capacity rather than energy. It is impractical to believe that peak demand issues can be addressed by new remote supply side resources regardless of their dispatchability. That being the case, one of the primary needs offered to justify this project cannot be addressed by this project, but must be addressed through more modern, distributed generation and other methods to readily dispatchable address peak load. We understand this is a transmission line FEIS and not a power planning document, but we also believe that decisions in a project as encompassing as this one cannot be made in a regulatory vacuum by excluding the diverse factors that support or detract from a project such as this. It is clear from the just-concluded development of the 2013 IRP that Idaho Power is not counting on Gateway West to satisfy its energy or capacity needs – at least over the course of the next two decades.</p>	
101022	KEN MILLER	SNAKE RIVER ALLIANCE	<p>The Purpose and Need section of the FEIS also says that: “Idaho Power has reported in the most recent POD (December 2012, Appendix B of this FEIS) that without adequate transmission capacity across southern Idaho, its ability to site future generation resources will be limited. The long lead time required to permit design and construct high voltage transmission lines simply will not allow new transmission capacity to be built in conjunction with the construction schedule of such primary new generation resources. Therefore, Idaho Power believes it is prudent to continue to pursue additional transmission capacity across southern Idaho through Gateway West.” This, according to the FEIS, is Idaho Power’s primary Purpose and Need for Gateway West. It closely tracks that of PacifiCorp (Rocky Mountain Power), which has identified similar needs, although given the size of its</p>	Your recommendation is noted. The BLM is implementing a phased decision.

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			service territory needs those needs are described as being much greater. The Alliance proposes that BLM withhold its Record of Decision (ROD) in this case until such time as the IRPs that are or will soon be considered by Idaho Power's and PacifiCorp's regulators in their respective states are reviewed by the public and either accepted or acknowledged, depending on the regulatory jurisdiction. PacifiCorp's 2013 IRP has been filed in all of its jurisdictions; Idaho Power's was to be filed June 28, and along with it a an application for a Certificate of Public Convenience and Necessity (CPCN), which will attempt to justify the need for significant coal plant investments to thermal plants that are central to some of the purported needs for Gateway West. Given the repeated delays encountered over the course of development of this EIS, it is not unreasonable to allow the additional time needed to adequately address all issues identified in the Purpose and Need section of this proposal.	
101022	KEN MILLER	SNAKE RIVER ALLIANCE	As mentioned above, much has changed since the IRPs (and IRP updates) filed by the Proponent Utilities, and as a result much of the language in the Purpose and Need Chapter in the FEIS is outdated and even subject to contrary proposals by the utilities. Those who have followed development of these IRPs know, for instance, that in the case of Idaho Power, the company's preferred alternative in its 2013 IRP contains no new supply side resource development over the 20 years covered by the plan, but rather will rely on expanded demand response measures in addition to the Boardman-Hemingway transmission project. Idaho Power is referenced on 1-15 of the FEIS as expecting that in the second decade covered by its IRP: "Some of these portfolios required Gateway West transmission capacity to deliver energy to major load centers in southern Idaho while others did not. The need for Gateway West capacity in each of these portfolios was driven by the assumed locations of the resources in each portfolio." If Idaho Power's 2013 IRP preferred alternative does not propose building new resources, it is difficult to understand how it and its partner, PacifiCorp, have justified the need for this project – at least at the present time and regardless of the long lead times required in developing a transmission project of this magnitude. In the case of Idaho Power, the utility's enthusiasm for moving forward with this project appears to wane with each IRP. Gateway West is not identified as a committed asset over the next 20 years – longer, actually, judging from the documents provided to the Company's IRP Advisory Council. It is also likely that the existing load on the east-west path that would presumably be expanded by Gateway West will diminish given the uncertain future of the coal assets owned or co-owned by Idaho Power and PacifiCorp.	Your comments on the need for the Project are noted. Refer to Chapter 1 for the Project's Purpose and Need.

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101022	KEN MILLER	SNAKE RIVER ALLIANCE	As planning for this project has advanced over the years, it has become clear that it is a project based on speculation of uncertain future requirements by both utilities. At a cost to utility customers of somewhere between \$1.5 billion and \$2.8 billion and climbing, BLM must evaluate the impacts to customers of both utilities should it propose advancing this project in light of the lack of demonstrated need. If the Agencies are factoring into their consideration the unproven need for the project, they should also be mindful of the enormous and long-lasting costs the project would place on utility customers.	Your comments on Idaho Power's needs for additional transmission lines are noted.
101022	KEN MILLER	SNAKE RIVER ALLIANCE	On 1-24 at 1.3.6 [Purpose of the Gateway West Proposed Action], the FEIS notes that: "The proponents state that from Windstar to Populus, Gateway West will deliver up to 1,500 MW of primarily wind energy for transmission to markets south and west of Populus, including the Wasatch Front." What the FEIS fails to acknowledge is that Idaho Power has identified no new wind additions to its system beyond that required by the 1978 Public Utility Regulatory Policies Act [PURPA]. The Company has made it clear that, aside from the wind it is statutorily required to accommodate on its system through PURPA, it has no interest in adding more during the 20-year time frame and beyond. All of this is to say that, as with the DEIS, the FEIS fails to present a Purpose and Need that is required to justify the significant environmental and related impacts –including the economic ones that would accompany this project in Wyoming and Idaho and burden customers of these utilities and presumably those served by other utilities that might purchase capacity on these lines for their own needs, which is addressed in Appendix B of the FEIS [Transmission Line and Substation Components, B-1] and which attempts to further demonstrate the need for this project: "The proposed transmission line is intended to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the Company's larger service areas and to other interconnected systems." Even though this language is contained in an appendix and therefore lacks the background to support it, it is nonetheless a problematic "everything but the kitchen sink" defense of this proposal. We agree absolutely in the need for a stable and reliable transmission system and in the region-wide resource adequacy, which has been and continues to be sufficient. But the Utility Proponents have fallen short in justifying the need for 1,500MW of new east-west capacity in an era in which certain thermal units owned or co-owned by the proponents might be retired even before this line would be built. It remains unclear where this 1,500MW would come from and how it would be generated inasmuch as coastal markets will not accept additional energy from	As stated in Chapter 1, "the BLM's purpose and need is to respond to an FLPMA ROW application submitted by Idaho Power Company and PacifiCorp to construct, operate, maintain, and decommission the Gateway West transmission line and associated infrastructure on public lands administered by the BLM in compliance with FLPMA, BLM ROW regulations, and other applicable federal laws and policies." These two regulated utilities have requested a ROW; FERC has issued a finding that this is needed. It is not the BLM's role to decide that FERC is incorrect and the lines are not needed.

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			<p>carbon-heavy thermal resources given their respective state clean energy requirements. And the potential for interconnecting this line to other systems, presumably serving southwestern markets, has not been clearly explained. This point is driven home as well by the Utility Proponents [Letter Number 100343] in their discussion of Chapter 4 – Cumulative Impact – 4.422 – 95 – Entire Section:</p> <p>“The analysis of electrical effects determined that the Gateway West project would have no effects o health or safety; therefor, there would be no cumulative effects to other past, present, or reasonably foreseeable future projects. This is the case across all alternatives. Cumulative impacts of noise due to corona effects are treated in Section 4.4.24 – it is unclear why the cumulative impacts analysis for electrical environments centers on health and safety, which is covered in the next section. This section should discuss the cumulative impacts of all the reasonable foreseeable future actions and this project on electrical capacity, reliability, public needs, peak usage, etc. The Draft EIS should be revised to incorporate these suggestions.” That BLM has struggled with this balancing act is reflected in its response to Idaho Power and Rocky Mountain Power: “The impact of this project on capacity, reliability, public needs, and peak usage is appropriately addressed in the Proponent’s Integrated Resource Plans (IRPs) that are reviewed and acknowledged by each state’s public utility commission. That analysis is beyond the scope of this EIS.”</p>	
101022	KEN MILLER	SNAKE RIVER ALLIANCE	<p>This point is driven home as well by the Utility Proponents [Letter Number 100343] in their discussion of Chapter 4 – Cumulative Impact – 4.422 – 95 – Entire Section:</p> <p>“The analysis of electrical effects determined that the Gateway West project would have no effects o health or safety; therefor, there would be no cumulative effects to other past, present, or reasonably foreseeable future projects. This is the case across all alternatives. Cumulative impacts of noise due to corona effects are treated in Section 4.4.24 – it is unclear why the cumulative impacts analysis for electrical environments centers on health and safety, which is covered in the next section. This section should discuss the cumulative impacts of all the reasonable foreseeable future actions and this project on electrical capacity, reliability, public needs, peak usage, etc. The Draft EIS should be revised to incorporate these suggestions.” That BLM has struggled with this balancing act is reflected in its response to Idaho Power and Rocky Mountain Power: “The impact of this project on capacity, reliability, public needs, and peak usage is appropriately addressed in the Proponent’s Integrated Resource Plans (IRPs) that are reviewed and acknowledged by each state’s public utility commission. That analysis is beyond the scope of this EIS.” The FEIS expands on that at ES-27 in the Executive Summary: “In other cases, although the effects of Gateway West would be minor, when taken together with effects of</p>	<p>The cumulative impacts discussion for electrical environments centers on health and safety because there was a concern raised by the public concerning the effect of the transmission lines on health. As the comment states, electrical capacity, reliability, public needs, and demand are discussed in Section 1.3.</p>

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			other past, present, and proposed future actions, many of which collectively already present a substantial cumulative effect, the cumulative impact may be considerable. Finally, there are some effects of Gateway West that would by themselves be large and, when considered with other effects also be cumulatively substantial.”	
101022	KEN MILLER	SNAKE RIVER ALLIANCE	For both Utility Proponents, wind generation is identified as a “purpose” for Gateway West. It is not a resource sought by Idaho Power, which has a 2013 IRP preferred portfolio that does not include significant additions of wind other than the statutorily required PURPA additions referenced above. And also as mentioned, Idaho Power’s projected needs between now and 2032 are mostly capacity needs and not energy needs, and it is unlikely those needs will be met with a portion of a 1,500MW east-side transmission addition or significant new supply side resources. Yet the Purpose and Need identified in this FEIS points to wind as the primary driver for the need of this project. Idaho Power has said repeatedly that wind has almost no capacity value, so any attempts to try to portray this proposed transmission project as a way to move wind energy to Idaho Power’s load centers should be carefully scrutinized if it is to be offered as one of the purposes for Gateway West. At 1-25 of the FEIS, the Agency notes that: “Gateway West is independent of, and would be built regardless of, any particular new generation project.” We disagree, and we don’t believe that existing regulations require the Agencies to consider the proposal “regardless of any particular new generation project,” since these projects, cumulative or not, are precisely why Gateway West has been proposed. While the need for this project is based not on one particular supply side resource (wind, as mentioned above, or coal, which is unlikely), it is clear from the FEIS that the proponent utilities believe their respective (though not yet identified) projects demand a new high-voltage transmission line. If it is true that the loss of one project here or one there would not alter the nature of the utilities’ request, it is also clear that without most of the projects individually, there would be no need for Gateway West.	The EIS states (in Chapter 2) that: "The objectives of the Project, 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". This does not imply that it is dependent only on wind energy.
101022	KEN MILLER	SNAKE RIVER ALLIANCE	In response to the Snake River Alliance’s DEIS comments proposing that the FEIS more fully examine the issue of regional adequacy and in particular the analysis contained in the [Northwest Power and Conservation Council’s 6th Power Plan, BLM reiterates its position that such a consideration of the Pacific Northwest’s regional electricity adequacy is beyond the scope of its review: “Analyzing regional needs for power is beyond the scope of this analysis. See the Purpose and Need discussion in Section 1.2 of Chapter 1.” Referencing Table 2.7.1 [Rating and Capacity of Paths With and Without the Gateway West Project, 2-7], we note that the five transmission paths identified appear to have no existing available transmission capacity. Yet at 1-39 in the Purpose and Need section under Generation, we find this seemingly contradictory statement regarding the need for this line: “Independent	Analyzing the Pacific Northwest’s regional electricity adequacy is beyond the scope of its review. Your conjecture that "new projects might advance with or without Gateway West" may be correct. It has no bearing on BLM's need to respond to the request under FLPMA.

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			producers are building new wind farms and have proposed many more. Some of these projects would be constructed, sending power into the grid before the Gateway Project is permitted. Therefore, their wind farms are not driving the Project and are not 'connected actions' under the 'part of a larger action' criterion." This seems to indicate that some of these new projects might advance with or without Gateway West, yet at the same time it is being argued that the relevant transmission paths lack capacity to accommodate those projects.	
101022	KEN MILLER	SNAKE RIVER ALLIANCE	Similarly, the FEIS states that the project is not dependent on one particular transmission route segment. Yet it is clear that in the case of the Bonneville Power Administration, Gateway West has little utility unless the Boardman-Hemingway line is completed. While we agree that this project, if built, would be built one segment at a time, we disagree that individual segments without regard to the value of another segment can analyze this project. In the case of Bonneville, for example, its new need to access southeast Idaho customers would depend not only on some sections of Gateway West, but also of Boardman-Hemingway.	Your opinion on the utility of individual segments is noted. The Proponents' responded to our question on the utility of individual segments by stating that each link between substations has independent utility to the Proponents' system. The BLM is not in the business of providing and distributing electricity and relies on the Proponents to evaluate the utility of individual segments of their own system.
101022	KEN MILLER	SNAKE RIVER ALLIANCE	Finally, at 1-39, the FEIS notes that: "Because the public utilities commissions of Idaho and Wyoming must allow the utilities to pass on the capital costs of system improvement, including but not limited to Gateway West, those commissions prohibit "speculative" construction and only permit capital improvement that show a clear demand ahead of construction." While this does include predictive models that estimate future growth, they are subject to review and approval by the commissions. Therefore, a project like Gateway West is in response to, rather than in anticipation of, load growth." While that may be true, it raises a question about why the FEIS includes at 1-14 and 1-15, in the Purpose and Need section, detailed references to anticipated load growth by both of the utility proponents. If the purpose of the FEIS is to respond to load growth, then references to anticipated load growth seem inappropriate given the current wording at 1-39.	The statements on pages 1-14 and 1-15 are in Section 1.3. As stated in the heading for Section 1.3, these statements are part of the Proponents' objectives. The BLM's Purpose and Need is provided in Section 1.2.
101022	KEN MILLER	SNAKE RIVER ALLIANCE	We would also point out that the FEIS in Chapter 45 – Cumulative Effects at 4-40, in Table 4.2.14 [Proposed Natural Gas-Fired Power Plants in Idaho], there is reference to the Mountain View Power Inc. Gateway project at 180MW, yet there are no indications that project will be built. Similarly, the Langley Gulch natural gas plant has been in operation for about one year. The proposed geothermal facilities section at 4-41 references five proposed geothermal projects in Idaho, yet those projects are unlikely to be developed for various reasons.	Your opinion that the Mountain View Power Inc. Gateway project and proposed geothermal facilities may never be built is noted. The Cumulative Effects chapter includes foreseeable projects. It is quite possible some will not be built and some not considered foreseeable will be built. We used the best information we were aware of. Although complete data are not available for all areas for all resources, sufficient data are available to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision on impacts of the various project alternatives would have on resources.

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101022	KEN MILLER	SNAKE RIVER ALLIANCE	<p>The federal agencies indicate that they are indifferent to the kinds of energy that would be moved on Gateway West and its related lines, if built. But it is difficult if not irresponsible to view this project in such a way that the agencies are indifferent to the commodity that would be shipped across their lands, and the environmental and other impacts associated with such a development. On a megawatt basis, it is reasonable to assume that energy from the Dave Johnston and Bridger coal plants in Wyoming are one of the primary commodities that would be shipped via an expanded transmission line. Without those resources, the need for Gateway West would evaporate, to the extent it even exists today. The FEIS concludes at 1.7.3.1 {1-39} that: "Given the [Council on Environmental Quality] definition, electrical generating sources that might use the Gateway West Project to transmit their power are not connected actions. Therefore, electrical generating sources are not analyzed in the direct and indirect effects analysis, but are included in the consideration of cumulative impacts. The requests for generation interconnection, whether they be fossil or renewable, to which the proponents must respond under FERC regulations, are made to multiple carriers, including other utilities if they are unable to respond to an interconnection request due to a denial of a ROW grant from BLM, other carriers may respond. Therefore, the new generation requests do not qualify as connected actions under the 'automatically trigger' criterion. The Gateway West Project can proceed without any one generation project. Multiple generators have made interconnection requests. The overall demand, rather than any one project, provides part of the impetus for the Project. Therefore, no particular project is necessarily tied to Gateway West." In response to a Snake River Alliance comment to the DEIS [Letter Number 100333] in which the Alliance noted that: "As of June 2011, all of the generators requesting transportation on Gateway West were wind energy..." BLM responded: "The commenter is correct, as of June 2011, only wind energy producers have requested transportation. Wind energy is an important energy source and the amount of wind energy used in the country is expected to grow. One study by the U.S. Department of Energy indicates that wind may provide 20 percent of the country's energy by 2030."</p> <p>We hope that DOE is correct, but even if wind provides 20 percent of the country's energy by 2030, that has no bearing on this application, particularly in light of the Alliance's comments above regarding Proponent Utility resource acquisition plans. Besides, also as noted above, this FEIS does not consider specific energy projects or types of energy generation, yet it repeatedly refers to them. Given the proven and growing impacts that coal extraction, transportation, and combustion are having nationwide and particularly in the West, and despite BLM's insistence that the nature of the resource that would be transmitted on Gateway West is immaterial, the Alliance cannot support new transmission projects that facilitate an expanded reliance on coal for energy projection. We are mindful of the</p>	The BLM has no authority to determine what forms of power may and may not be transported through transmission lines built across BLM-managed lands.

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			need to maintain and in some cases build new transmission projects for purposes of grid reliability and to accommodate expanded load, but contrary to BLM's assertions, reviews of such projects cannot be made in a vacuum and without regard to their environmental and climate impacts. In addition, the Alliance would not support expanded wind power development simply for the stake of building new wind farms: Any new energy resource must be considered for its overall environmental impacts regardless of its carbon emissions.	
101022	KEN MILLER	SNAKE RIVER ALLIANCE	It is difficult to escape the fact that a disproportionate amount of land that would be crossed by the proposed Gateway West project is private land. According to Table 1.7-2 [138], about 45.2 percent of the land impacted by construction would be private lands. About 44.7 percent of the land impacted by operations would be private land. Yet private lands account for less than 30 percent of the ownership in Idaho. We respect and are sensitive to concerns raised by affected local communities and their residents and the perception that the use of private lands for a project such as this may be preferred by certain proponents as a matter of expediency for the sake of environmental review. Those concerns are being made effectively by other commenters with greater familiarity of these issues than we have.	Your concern that too much of the Preferred Route in Idaho is on private land is noted. Many people commented that electricity is a public need; therefore, the lines should be placed on public lands. Others have commented that the power is needed to supply activities on private lands. Therefore, the transmission lines should be on private lands and not cross undeveloped land managed for wildlife habitat and recreation. The Preferred alternative seeks to balance the two concerns.
101022	KEN MILLER	SNAKE RIVER ALLIANCE	The Snake River Alliance appreciates the earnest efforts by the Proponent Utilities, the BLM, and state and federal participants and preparers of the FEIS to address the many questions, suggestions, concerns, and observations posed by the hundreds of individuals and entities that commented on the DEIS. We believe this document is stronger for those efforts. The revised Chapter 1 language in the FEIS, however, continues to be unpersuasive with regard to the Purpose and Need for this project. We are confronted with a scattershot of reasons why the Utility Proponents believe this project is necessary, but many of those arguments, like the FEIS itself, are based on information that is clearly outdated and that must be freshened if it is to be included at all in this FEIS. We understand the time required to date in preparation of this document, but much has changed since the DEIS and as a result much of the case made in Chapter 1 is readily refutable. We encourage the BLM to consider the comments it is receiving in response to this document and to reconsider whether it is prepared to defend a Record of Decision in support of the proposed Gateway West proposal.	That you find the FEIS "unpersuasive with regard to the Purpose and Need for this project" is noted. Many of the recommendations received from the public are beyond the scope of the BLM's purpose and need, which is stated in Chapter 1: "...the BLM's purpose and need is to respond to an FLPMA ROW application submitted by Idaho Power Company and PacifiCorp to construct, operate, maintain, and decommission the Gateway West transmission line and associated infrastructure on public lands administered by the BLM in compliance with FLPMA, BLM ROW regulations, and other applicable federal laws and policies."
101023	KENT AND FRANCINE RUDEEN		Please accept the following comments concerning the Gateway transmission power line project. Most of our concerns are centered on the impact in Power County as you have proposed putting the line on our personal property. We strongly object to the location due to environmental and economic impacts	The BLM does not have authority to grant ROW access on private property. Siting of the transmission line on private property will be determined through the state and county permitting processes.

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101023	KENT AND FRANCINE RUDEEN		Sharp Tail Grouse and Sage Grouse; The impact on birds and habitat on our private property has not been assessed as it is on Public lands. If our land was Public you would have found a way around it. We have a plentiful population of sharp tail grouse and many other birds (pheasants, partridges, etc.). The Pro and Amateur field dog trials have been held on my lands next to Cold Creek (and under the proposed line sites) for 24 years. It is one of the finest areas for their trials in the northwest due to the abundance of sharp tails. They will probably discontinue this location due to the influence of your transmission line.	An intensive analysis of impacts to sage-grouse was completed across their known habitat range, regardless of land ownership. Results are discussed in Section 3.10 of the FEIS. Sharp-tailed grouse are discussed in Section 3.10. The exact location of the lines has been determined. The line in the FEIS is based on indicative engineering. It would be up to the county to determine where the final design would cross any individual property, not the BLM.
101023	KENT AND FRANCINE RUDEEN		View shed: Why is the sight of these transmission lines a reason not to locate on public lands but not taken into account on private lands?	Visual impact analysis was conducted for both public and private lands, presented in Section 3.2 of the FEIS. The BLM manages resources on federal lands under its jurisdiction. It manages visual resources on these lands as required by applicable laws and regulations. It has no authority to protect visual resources on private lands.
101023	KENT AND FRANCINE RUDEEN		The sight of them on my lands will be apparent every day when I look out my window. They will deter many future land sales in the area	The analysis recognizes that the transmission line would affect scenery and property values on private land. Visual impact analysis was conducted for both public and private lands, presented in Section 3.2 of the FEIS. Impacts to property values are discussed in Section 3.4.
101023	KENT AND FRANCINE RUDEEN		and interfere with my right to enjoy my property and recreational uses for others.	The line shown in the FEIS is based on indicative engineering. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit or prohibit the project on private or state lands. Recreational impacts are discussed in Section 3.17 of the FEIS.
101023	KENT AND FRANCINE RUDEEN		Eagle Corridor; My property near Cold Creek Road serves as an Eagle flight corridor in winter months. Wind companies have studied and determined not to build in this area due to the fact that they think it will deter Eagles from accessing the Bowen Canyon Bald Eagle Sanctuary. Your transmission line runs thru this corridor without study or consultation with the Fish and Wildlife Service. Not only will you risk impacts with Eagles but you most likely will deter them from the route most commonly used.	BLM has consulted with the U.S. Fish and Wildlife Service and conducted analysis of impacts to eagles; the results are discussed in Section 3.10 of the FEIS.
101023	KENT AND FRANCINE RUDEEN		Land Impacts; It is likely that your transmission lines will have a negative impact on my ability to use my lands i.e.: for recreational and hunting income. CRP leases could be impacted. Construction such as road work and tower placement will decrease the value of my property. The proposed way of compensation (buying an easement at market price) does not come close to the economic impact I will endure from the transmission lines.	Economic impacts are discussed in Section 3.4 of the FEIS, and the CRP is discussed in Section 3.18 – Agriculture.

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101023	KENT AND FRANCINE RUDEEN		WECC Requirements; Separation of lines by a wide distance was the main argument used to pick your routes. The WECC standards are applied differently across the country or not followed at all. You should rethink using these standards and be more adaptable in route selection. I object to your use of WECC criteria for site selection since it is inconsistent and impractical.	The issue of separation distances between transmission lines is discussed in detail in Chapter 1 of the FEIS. The BLM has concluded that the minimum separation distances proposed by the Proponents are reasonable and consistent with regional conditions.
101023	KENT AND FRANCINE RUDEEN		Need to build: I think that since the concept and proposal of this project began things have changed in the need for it. MISTI recently put their project on hold due the fact of the natural gas boom has made it so power can more easily and economically be generated where it is going to be used, rather than building large transmission lines to ship wind and coal power through Idaho to the West Coast. They told me the opportunity to contract delivery of power had changed so much that their project was not feasible at this time. Gateway should change their way of thinking before building this line.	Your comments on rethinking the need for the project are noted. Chapter 1 of the FEIS discloses the BLM's purpose and need, which is to respond to the request for a ROW grant as required under FLPMA and BLM's ROW regulations. The BLM's purpose does not include determining the need for additional transmission lines. It relies on other agencies to make this determination, See the discussion in Section 1.3 of the FEIS.
101023	KENT AND FRANCINE RUDEEN		In summary, the environmental and economic impacts on private lands have been under estimated and under evaluated. Please look at the impacts you are creating for the citizens who are carrying the burden for your project and postpone it indefinitely. We strongly object to the project. Sincerely,	Your opposition to the Project is noted. Following comments on the adequacy of our economic analysis in the DEIS, the BLM contracted with an independent agricultural specialist approved by the Cassia and Power County task forces. We revised our analysis in sections 3.4 and 3.18 based on his input. The BLM has sought to balance the need to update the electric grid with protecting economic and environmental resources.
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	Our concern with the project is primarily with the placement of the route and the apparent reluctance of the BLM to site the project on federally managed lands as much as possible. Our specific comments will be primarily related to segments 5, 7 and 9 which run through Power, Cassia and Owyhee Counties in Idaho, where most of the controversy over negative effects on private land are centered.	Your concern with Segments 5, 7, and 9 is noted. The BLM only has the authority to permit the Project on BLM-managed lands and has no position on siting decisions on private land. Permitting on private lands will be conducted by the state and counties. The FEIS, however, analyzed effects across all ownerships, and the preferred alternative seeks to balance the effects on both public and private land, as well as avoid, minimize, and mitigate impacts to the greatest extent possible. The majority of the 1,000-mile Gateway West line is sited on public land; however, this is not the case in all segments.
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	Snake River Birds of Prey National Conservation Area (SRBOP) The Owyhee County Task Force (OCTF) had worked out a carefully crafted proposal balancing the needs of the local economy with protection of the resources. Under their proposal, the GWTL only crossed private property where landowners were willing to allow a right-of-way to be negotiated and much of the route paralleled existing lines through the SRBOP. Page 2-202 of the FEIS states "constructing an additional transmission line across the SRBOP would not meet the intent of the enabling legislation for the SRBOP." To throw out those efforts under the guise of vague language in the enabling act of the SRBOP which states the purposes of the SRBOP are "to provide for the conservation, protection and enhancement of raptor populations	Many of the studies referenced in the comment were considered in the analysis for the FEIS (see the reference list in Chapter 7), and the FEIS agrees that conductor spacing for the 500 kV lines is too great (19.5 feet) to pose a danger to raptors (Section 3.10.2.2 of the FEIS). However, BLM Manual 6220 states: "District and Field Manager shall: Ensure that all activities on Monument and NCA lands are consistent with the relevant designating legislation..." The NLCS staff review of the EIS analysis indicated that only the preferred routes would likely meet the intent of the enabling legislation. The ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available

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			<p>and habitats" is preposterous, especially given the BLM's own studies indicating that power lines do in fact enhance raptor habitat. As the Owyhee County Task Force has already pointed out in their previous comments, in 1981, less than a year after Secretary of the Interior, and former Governor of Idaho, Cecil Andrus withdrew 482,000 acres of BLM managed land to protect birds of prey nesting in the Snake River Canyon in southwestern Idaho, Pacific Power and Light (now PacifiCorp) began construction of a 500 kV transmission line across what is now the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP). At that time raptor expert Morley Nelson, the namesake of the subsequent SRBOP, assisted PP&L with the routing of the line so it would not adversely affect raptors and with designing platforms for transmission towers that would encourage raptor nesting (Nelson 1976, Nelson and Nelson 1982).</p> <p>In addition, and again prior to the designation of the SRBOP as a National Conservation Area, from 1981 through 1989, the BLM and PP&L biologists monitored the response of raptors and ravens to the transmission line. These studies conclusively proved that transmission lines provided enhanced opportunities for raptors to perch, nest and roost; and the productivity of hawks and eagles nesting on transmission towers was as good, and in some cases better, than those nesting in natural environments. (Engel et al. 1992; Steenhof et al. 1993)</p> <p>The BLM's own scientific studies fly in the face of the political decisions from Washington DC bureaucrats that no more transmission lines can ever be sited in a National Conservation Area.</p>	<p>at the time the FEIS was prepared. This is the reason that the BLM did not select the proposed routes or other alternatives for Segments 8 and 9.</p>
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	<p>Sage Grouse The Gateway West EIS issued a Sage Grouse Addendum in June 2012, which stated "the [Idaho] task force's recommendations would be incorporated into the final EIS if approved by the Governor prior to the publication of the EIS." Sage Grouse Addendum, Page 7. The Governor's Task Force issued its recommendations June 15, 2012. Those recommendations were incorporated into the Federal Alternative of Governor C.I. Butch Otter for Greater Sage-Grouse Management in Idaho, September 5, 2012. Despite the promise of the BLM in the Sage Grouse Addendum, the BLM has completely ignored and contradicted the Idaho Sage Grouse management plan in the GWTLF FEIS and instead relied upon outdated BLM data. In fact, no consideration was given to the Idaho Sage-Grouse Task Force findings or the Idaho sage-grouse habitat map which differs greatly from that of the BLM. This makes no sense, particularly in light of the stated intent of BLM to include the new Idaho data. Specifically, in Owyhee County, our members favor alternative 9D as it is the route with the least impact on Sage Grouse, which we are working very closely with the Governor's Sage Grouse task force to protect, along with other stakeholders, so as to avoid it becoming a listed species under the Endangered Species Act.</p>	<p>Your support of Alternative 9D is noted. The Idaho Governor's Task Force recommendations are addressed in FEIS Section 3.11.1.3. The Governor's Alternative was finalized, as stated in the comment, in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on the BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis.</p>

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101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	<p>A number of Idaho environmental groups have commented that the BLM's preferred alternative route 9E would pass through Preliminary Priority Habitat (PPH) for sage-grouse. PPH, as Identified in the BLM's Greater Sage-Grouse Interim Management Policies and Procedures, IM 2012-043 (12/27/11}, "comprises areas that have been identified as having the highest conservation value to maintaining sustainable Greater Sage-Grouse populations". IM2012-043 requires additional procedures for pending ROW applications that would affect more than 11linear mile of Sage Grouse habitat.</p> <p>Segment 9E would affect nearly fifty miles of PPH according to the environmental groups' assessments.</p> <p>Not long ago, Karen Steenhof, one of the biologists who studied the effects of transmission lines through the SRBOP, submitted the following comments to Carl Rountree, Director of NLCS: "A new transmission line in Owyhee County (9E) would attract raptors and ravens and could lead to increased predation on declining Greater sage-grouse populations. Golden eagles prey on adult Sage Grouse, and Common Ravens are a major predator of Sage Grouse eggs. Recently, Idaho State University (ISU) biologists have</p> <p>noted a dramatic increase in the predation of Sage Grouse by ravens. Where there are more ravens, nesting female Sage Grouse stay on their nests much longer, leaving less often. less time foraging may cause "substantial physiological distress" on the Sage Grouse. It would be better to attract raptors and ravens to cheat grass areas in the NCA where they feed on ground squirrels than to the shrubsteppe areas inhabited by sage-grouse in Owyhee County."</p>	<p>Alternative 9E was revised between the draft and final EIS to avoid sage-grouse preliminary priority habitat (PPH) and incorporate a recommended route change submitted by Owyhee County that avoids a planned subdivision near Murphy (though it is not the County's preferred alternative). Based on indicative engineering, Alternative 9E would impact 7 acres of PPH during construction (mainly due to improvement of existing roads) and 2 acres during operation of the Project (see Section 3.11.2.3 of the FEIS). PPH would be avoided to the extent feasible during final design of Alternative 9E. Numerous protection measures, summarized in Table 2.7-1 and detailed in Appendix C to the FEIS, have been included to avoid, minimize, and mitigate impacts to greater sage-grouse consistent with federal laws and policies, including BLM's IM 2012-043. A discussion of predation due to increased perching habitat is located in Section 3.11.2.2 of the FEIS.</p>
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	<p>We have similar concerns for segment 7. On page 2-191,of the FEIS section 2.8.S it mentions twice that key sage-grouse habitat should be avoided as a pretense to dismiss the locally preferred alternative 7K. However, alternative 7K does in fact avoid all "core" habitat (CHZ) as identified by the Idaho Sage Grouse Task Force, although it does cross "important" habitat (1HZ) which is compatible with the Idaho plan using mitigation measures. Here again, BLM habitat data is seriously out of sync with the Idaho Sage Grouse Task Force habitat maps.</p>	<p>As noted above, the Governor's Task Force recommendation was provided to BLM in September 2012 for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis. Based on currently identified sage-grouse Preliminary Priority Habitat (PPH), Alternative 7K would impact roughly 10 times more PPH during operation of the Project than the entire length of the BLM Preferred Route (175 acres vs. 17 acres). Section 3.11.2.3 of the FEIS provides detailed analysis of impacts of Alternative 7K on sage-grouse and other special status species, which are all greater than the Preferred Route.</p>

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101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	It is disappointing that the Bureau land Management (BLM) states that their decisions "could affect private lands adjacent to or between federal areas" on page 3.18-1 of the FEIS. Our members fully understand that the BLM only has the authority to give final approval of the transmission line routes on federal land. However, when the BLM authorizes the route on federally managed land, its decisions directly impact the location of the transmission lines on private property. Therefore, clearly the decisions of the BLM do indeed directly impact how much private property is affected as this project moves forward.	Noted. The BLM did listen to comments and concerns regarding impact to private lands, including agricultural lands. However, there are many factors to consider in selecting the preferred alternative. Please refer to Section 2.4.1 for the reasons that the BLM's Preferred Alternative was identified. Please refer to the discussion of siting through agricultural lands in Section 3.18, including Figure 3.18-2 which shows how towers would be sited in agricultural lands to minimize disturbance. The state and counties are responsible for additional siting specifications and any permitting on private lands.
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	For example, only 17% of the land in Owyhee County is privately owned. Because the BLM has rejected the collaborative efforts of all interested local stakeholders who recommended alternative 90 after three long years of intense study, discussion and consensus building, there are additional negative impacts to private property under the agency's preferred alternative 9E. This is unacceptable.	Both Alternatives 9D and 9E are located almost entirely on BLM-managed lands. Approximately 95% of Alternative 9E is located on public lands, crossing 3.3 miles private land, the same length of private land as Alternative 9D. Alternative 9D, however, would cross 54.3 miles of the Snake River Birds of Prey National Conservation Area (SRBOP). The BLM's NLCS staff review of the Agency's proposed Preferred Alternative and mitigation measures available at the time the FEIS was prepared determined that 9D would not be consistent with the enhancement requirements of the enabling legislation of the SRBOP, which the BLM is required to meet by law.
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	Every acre of private property lost in Owyhee County shrinks the local economy. Furthermore, the preferred alternatives that run through Power and Cassia Counties are nearly 80% on private property. This will present significant negative impacts on the local economy as agricultural operations will be affected.	Economic impacts are discussed in Section 3.4 of the FEIS, and agricultural effects are discussed in Section 3.18, Agriculture. Section 2.4.1.1 of the FEIS discusses why the preferred alternatives were chosen in Power and Cassia counties.
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	On page 3.4-42 and again on pages 3.18-13 and 3.18-17 it states "Viewed in terms of agricultural operations in the potentially affected counties, total estimated construction and operations disturbance represents a very small share of the 17 (15) million acres of land in farms in the 19 potentially affected counties and is unlikely to noticeably affect overall agricultural production and employment in any of the affected counties. Impacts could, however, be potentially significant to the individual operations affected, as discussed in Section 3.18-Agriculture." This is an understatement at best and deliberately misleading at worst. Certainly if you took the number of actual private agricultural acres affected by the GWTIP compared to the total number of agricultural acres in the counties it crosses, it would be a relatively small percentage. Yet the impact on each individual landowner is very significant. More relevant statistics would be the total acres of construction disturbance and operation disturbance as a percentage of private acres within the ROW for the project area.	The effects to agricultural lands analyzed in Section 3.18 are provided in the context of existing agricultural lands within the analysis area. The analysis area is defined as an area of 250 feet on each side of the route alternatives, as well as 25 feet on each side of the centerline for access roads that extend outside this area, and includes the areas needed for new or expanded substations and temporary facilities such as multi-purpose yards. Table 3.18-1 provides the existing acres of agricultural land use and the percent of the analysis area. Each alternative is then evaluated for impacts to agricultural lands during construction and operation of the project, providing acres disturbed and reiterating the analysis area baseline for comparison for each project segment (see Section 3.18.2.2). While not provided as a separate column in the impact tables, the percentage of land that would be disturbed within the analysis area can be readily calculated with the information provided. For example, in Segment 5, an estimated 32 acres of cropland would be disturbed by the BLM's Preferred Route during operations, out of a total 1,651 acres in the analysis area, or approximately 1.9 percent (p. 3.18-34). Different metrics can be

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				calculated using the analysis provided in Section 3.18 depending on the specific interest of the reader. The FEIS discloses potential adverse effects to individual agricultural operators, including an additional independent economic analysis in Appendix K, and states that the Proponents would negotiate damage-related issues, such as reductions in the acreage available for cultivation, with affected farmers during the easement acquisition process (p. 3.18-17).
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	Page 3.4-46 illustrates an example of the projected annual increased costs to landowners along 4 sections of proposed route 7 in Cassia County, each segment being two miles long. The increased annual projected operating costs due to the towers within or on the edge of the fields ranged from \$2,235 to \$7,749 for each two mile segment. These are estimated annual costs at today's prices. These additional expenses must be paid by the proponents to the landowners each year just to recover their extra operating expenses, not to mention additional compensation for the value of the right-of-way. Inflation will need to be factored in, as well as the loss of managerial options for future expansion and/or improved efficiencies for the operation. There are a great deal of actual cash damages that the landowners will need to be compensated for so as not to be in a worse position in their operation than prior to the GWTLF. There are legitimately grave concerns of landowners that they will be in a worse position with the GWTLF crossing their property than they would be otherwise. If these concerns are realized, it will have a detrimental effect on each agricultural operation, which, when taken in aggregate, will make the local economy worse off than it would have been without the GWTLF. This will mean fewer agricultural jobs, fewer purchases at local businesses, and a lower multiplier in the local economy. Greater use of federally managed lands for the routing of the GWTLF would alleviate these potentially devastating consequences to the local economy and the agricultural sector of the state. As noted above, there is serious concern from our members over the cavalier attitude of the BLM regarding the impact to agricultural operations of the GWTLF. That private property owners must "negotiate" with the proponents of the project, under the threat of eminent domain, is not addressed. It is simply stated on page 3.4-48 and again on page 3.18-17 and elsewhere that Proponents recognize that construction of the project has the potential to have detrimental impacts on farms and "would negotiate damage-related issues, such as reductions in the acreage available for cultivation, with affected farmers during the easement acquisition process." The reality is that very rarely, if ever, is a private landowner fully compensated for the value of the actual land he loses, much less for the additional out-of-pocket expenses he bears each year in perpetuity, the loss of efficiency to his operation, loss of future upgrades/expansions he will have to forego	The BLM has listened to concerns from landowners and takes them seriously. The FEIS takes a hard look at impacts to agricultural lands in Sections 3.4, 3.18, and in Appendix K. Condemnation under eminent domain laws is addressed in Section 3.17. Chapter 1 notes: "The Proponents would be required to obtain ROW on non-federal lands through negotiated easements or under eminent domain laws." The easement process is a standard method for landowners to negotiate compensation and stipulate terms of use on their property. If a fee ownership or an easement cannot be negotiated with a landowner, the Proponents may acquire the rights needed under eminent domain laws prevailing in the affected states. State and county laws have been enacted that define the acquisition process on private and non-federal public lands for utilities. The BLM is not making a decision on whether or how the Proponents will acquire access across private lands; this is an issue for the individual landowner and in some cases the state court. The BLM has no authority to require certain compensation or mitigation on private lands.

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			and any other related losses he may suffer. These other costs, both tangible and intangible, can be much higher than the value of the actual and lost to construction. If there were no threat of eminent domain, then the proponents would indeed be forced to pay what the various landowners needed in order to make an equitable agreement. Unfortunately, this is not the case. Eminent domain is a huge hammer held over the head of any landowner who wants to be fairly compensated for the actual damages caused by the ongoing disruption to his operation. Furthermore, on page 3.18-17 it states "The effect that a transmission line easement may have on agricultural property values is a damage-related issue that would be negotiated between the landowner and Proponents during the fee simple or easement acquisition process. The easement acquisition process is designed to provide fair compensation to the landowner for the right to use the property for transmission line construction and operation. The easement value in theory is equal to the difference in value of the affected property before and after easement acquisition and construction of the proposed facilities." This explanation does not address whether the difference in value is on the entire farming operation before and after the project is completed, which would more fully address our concerns, or simply on the actual "affected property" within the ROW. There is a huge difference between the two.	
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	<p>Additional Concerns</p> <p>Alternative 5C appears to have been dismissed from consideration by the BLM because it would cross the Fort Hall Indian Reservation for approximately 12 miles parallel to an existing transmission line and the Shoshone-Bannock Tribal Business Council voted to not allow the project through the Reservation. This appears to be a poorly concealed double standard. The Power County Commission, which the BLM acknowledges as the lawful siting authority under Idaho law on non-federally managed lands, has rejected the BLM preferred alternatives in both segment 5 and segment 7, yet the BLM continues to not only consider, but to actually pursue these alternatives as their preferred alternative. How can one local government authority receive complete deference to their decisions, while another local government authority is completely ignored? This inconsistency must be addressed.</p>	<p>The County may consider this a double standard but there is a major difference between the County government and the Tribes. The Shoshone-Bannock are a sovereign nation, the county is not; the BLM is upholding all applicable laws and policies. The BLM lacks the authority to grant a ROW on tribal lands or any lands other than those prescribed by law. As described in Chapter 2 of the FEIS, federal law (25 U.S.C. §324) provides: "No grant of a right-of-way over and across any lands belonging to a tribe organized under the Act of June 18, 1934 (48 Stat. 984) [25 USCS § § 461 et seq.], as amended; the Act of May 1, 1936 (49 Stat. 1350); or the Act of June 26, 1936 (49 Stat. 1967) [25 USCS § § 501 et seq.], shall be made without the consent of the proper tribal officials." The Fort Hall Reservation was organized under the Indian Reorganization Act of June 18, 1934. Following the Fort Hall Business Council's decision not to permit the Project to be built across the Reservation, the BLM reviewed the remaining route choices analyzed in the Draft EIS, all of which potentially impacted BLM-managed lands, and selected the Proposed Route across federal land incorporating Alternatives 5B and 5E as its Preferred Route for Segment 5. The Preferred Route minimizes impacts to public land resources in the Deep Creek Mountains. The final alignment across private land will be determined by the local government, private landowners, and the Proponents, following state law and local procedures.</p>

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101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	Finally, the FEIS is an extremely complex and lengthy document. It is a difficult task for professionals who deal with these documents regularly to wade through the data and make specific, meaningful comments. It is even more difficult, if not impossible, for ordinary citizens who are not familiar with the process and the technical aspects of a FEIS to analyze it sufficiently and prepare meaningful comments in a 60 day time period; particularly when they are busy earning a living and caring for their families. Therefore, we respectfully request that the comment period be extended for an additional ninety (90) days to allow those who are most affected by the potential route to have a better opportunity to fully review the document and provide input on the FEIS.	The BLM considered the request for an extended comment period but believes, based on the comments received, that 60 days was adequate for the public to respond with meaningful comments.
101024	JULIE CHRISTOFFERSEN, FRANK PRIESTLEY	IDAHO FARM BUREAU FEDERATION	After reviewing the FEIS, we are not persuaded that the BLM has shown conclusive and convincing proof that the agency preferred alternatives in segments 5,7 and 9 are better choices than the locally supported alternatives of SE,7K and 90. Even when viewed through the lens of the agencies own regulations there is not an advantage to the preferred alternatives, and in many cases the locally supported alternatives are superior using your own criteria. Therefore, we urge you to abandon the agency preferred alternatives in segments S,7 and 9 in favor of the routes that have been supported by local stakeholders who live, work and own property along the routes. We respectfully request the BLM support alternatives SE,7K and 90 in your Record of Decision. Again, thank you for the opportunity to provide these comments on the GWTLF FEIS.	Your support of the locally supported alternatives for Segments 5, 7, and 9 is noted. Many factors influenced the selection of the preferred alternatives, including extensive environmental analysis, public comment, and interagency and inter-governmental coordination over several years. The reasons for selecting the BLM Preferred Routes in each segment are explained in Section 2.4.1.1. The BLM lacks the authority to grant a ROW on tribal lands or any lands other than those prescribed by law. As described in Chapter 2 of the FEIS, federal law (25 U.S.C. §324) provides: “No grant of a right-of-way over and across any lands belonging to a tribe organized under the Act of June 18, 1934 (48 Stat. 984) [25 USCS § § 461 et seq.], as amended; the Act of May 1, 1936 (49 Stat. 1350); or the Act of June 26, 1936 (49 Stat. 1967) [25 USCS § § 501 et seq.], shall be made without the consent of the proper tribal officials.” The Fort Hall Reservation was organized under the Indian Reorganization Act of June 18, 1934. Following the Fort Hall Business Council’s decision not to permit the Project to be built across the Reservation, the BLM reviewed the remaining route choices analyzed in the Draft EIS and selected the Proposed Route across federal land incorporating Alternatives 5B and 5E as its Preferred Route for Segment 5. The exact alignment across private land will be determined by the local government, private landowners, and the Proponents, following state law and local procedures. Alternative 7K would cross nearly 1,400 acres of Preliminary Priority Habitat (10 times as much as the Preferred Route), be in close proximity to important California NHT features such as the City of Rocks National Reserve and Granite Pass, and be approximately 35 miles longer than the BLM Preferred Route. In the Segment 9, both Alternatives 9D and 9E are located almost entirely on BLM-managed lands, each cross 3.3 miles private land. However, the NLCS staff review of the Agency’s proposed Preferred Alternative and the mitigation measures available at the time the FEIS was prepared determined that 9D would not be consistent with the enhancement requirements of the enabling legislation of the SRBOP, which the BLM is required to meet by law.

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101025	JOY BANNON	Wyoming Wildlife Federation	In our Draft Environmental Impact Statement (DEIS) comments, WWF identified avoiding environmental and social impacts to the greatest extent possible. In addition, WWF commented that the transmission line should be developed within existing corridors and co-located with other transmission lines, when possible. Areas that should be avoided include crucial big game winter ranges/severe winter ranges, migration corridors, Greater Sage-grouse core areas, National Wild, Scenic, and Recreational Rivers, wetlands, National Historic and National Scenic trails, and cutthroat trout habitat. WWF also provided our preferred siting route that satisfied the priorities mentioned.	Noted. The BLM's Preferred Alternatives do seek to follow existing corridors where possible, as well as avoid wildlife habitat additional protected resources as suggested by the comment.
101025	JOY BANNON	Wyoming Wildlife Federation	The Final EIS preferred segment 1 did change from the preferred segment 1 in the DEIS. WWF accepts segment 1 in the FEIS because it is in compliance with Wyoming's Greater sage-grouse core area strategy, is primarily within designated corridors or is parallel to existing linear infrastructure for more than 90% of its length, rebuilds an existing transmission line, which limits surface disturbance, and will run parallel to an existing transmission line.	This comment is noted.
101025	JOY BANNON	Wyoming Wildlife Federation	Segment 2 and 3 were maintained or had few changes from the DEIS, thus WWF remains in support of those segments.	Your support is noted.
101025	JOY BANNON	Wyoming Wildlife Federation	With respect to segment 4, WWF suggested 4F/4A or a combination of the preferred and 4F. Due to the fact that 4F doesn't comply with Wyoming's Greater sage- grouse core area strategy, WWF concedes that the route can't be considered. We chose the preferred in combination with 4F because 4F has lesser impacts to Visual Resource Management (VRM) Class II status. WWF finds segment 4 sufficient in that it will follow an existing transmission line for 75% of its segment and does avoid crossing Seedskaadee National Wildlife Refuge, minimizes wetland impacts, avoids unstable soils and step terrain, and avoids sage grouse leks.	Your support is noted.
101025	JOY BANNON	Wyoming Wildlife Federation	Recreation In the DEIS comments submitted by WWF, we recommended avoiding transmission line construction during the hunting season so that big game are not disturbed and don't move out of a hunters area due to habitat fragmentation, noise, increased traffic, and general construction activity. The BLM's response to our DEIS comment reads, "Given the restrictions on operating during most of the year to protect wildlife (see the closure periods in Appendix I) it would not be practical to also restrict construction during hunting periods." (FEIS, Appendix L-57) WWF realizes that the proponents have many time frame restrictions to abide by, but for the BLM and the proponents to make no effort what so ever to accommodate hunting and Wyoming sporting heritage is an insult. Hunting is an economic contributor to Wyoming's communities and state coffers. Over 37 million Americans took part in hunting, fishing or both, spending \$90 billion." (National Survey of Fishing, Hunting, and Wildlife-Associated	Potential impacts to hunting as a recreational activity are assessed in Section 3.17 of the FEIS. The FEIS discloses potential effects, which can vary widely as hunting in the project area varies by season and location, as permitted by the Wyoming Game and Fish Department and Idaho Department of Fish and Game. In addition, some wildlife may be attracted to disturbed areas (see Section 3.10 - General Wildlife and Fish), which could improve hunting and wildlife viewing opportunities in some areas, while reducing or temporarily eliminating opportunities in other areas. Any adverse impacts would be limited and short-term in nature. The Multiple Use Sustained Yield Act of 1960 applies to National Forest lands administered by the Forest Service. The BLM is in compliance with the Federal Land Policy and Management Act (FLPMA) and BLM ROW regulations, 43 CFR Part 2800, that require the BLM to manage public lands for multiple uses that

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			Recreation State Overview Report, U.S. Fish and Wildlife Service, Issued September 2012) In addition, “the 2011 National Survey data show that hunters, anglers and wildlife watchers spent \$145 billion last year on related gear, trips and other purchases such as licenses, tags and land leasing or ownership.” (National Survey of Fishing, Hunting, and Wildlife-Associated Recreation State Overview Report, U.S. Fish and Wildlife Service, Issued September 2012) Hunting should not be overlooked or dismissed as a multiple use and economic driver. The BLM and the proponents could establish a general rule to limit construction activity in the early morning and during dusk when big game are more apt to be eating, out of cover, and have a greater chance of being harvested by a hunter. WWF finds it unacceptable for the BLM and the proponent to just throw their hands up and deny the ability to work with sportsmen on this issue. We would also suggest taking a close look at the Multiple Use and Sustained Yield Act to make sure the BLM is in compliance with that Act for this issue.	take into account the long-term needs for future generations of renewable and non-renewable resources. Where needed to be in compliance with applicable land use management plans, both the BLM and Forest Service have proposed amendments to those plans, analyzed in detail in Appendix F to the FEIS.
101025	JOY BANNON	Wyoming Wildlife Federation	<p>Environmental Protection Measures WWF’s DEIS comments recommended several environmental protection measures (EPM) that we requested the BLM address and incorporate within the FEIS. The following EPMs were incorporated into the FEIS and WWF supports their inclusion.</p> <ul style="list-style-type: none"> • Decontamination of equipment should occur before work begins around or near water, as well as when construction equipment leaves the area. • Areas disturbed during construction that contribute sediment to surface waters should be re-vegetated as quickly as possible to ensure water quality. • Riparian vegetation should be protected by leaving a 200 foot buffer on each side of streams and water courses. The buffer should be expanded to 500 feet in the case of waterways with sensitive aquatic species. • Equipment should be serviced and fueled away from riparian areas. • All lines should be constructed in a raptor proof manner, ensuring the safety of raptors throughout the area. • Shuttles/busses should be used whenever possible to reduce vehicle traffic in the area. <p>Vehicle traffic and increased human interaction can result in increased movement in mule deer and increased physiological stress (Group 2007). Interactions should be minimized whenever possible.</p> <ul style="list-style-type: none"> • No construction activity should take place from November 15 – April 30 in big game crucial winter range to minimize impacts to wintering wildlife. <p>The following EPM’s were provided with responses from the BLM that are not adequate. WWF understands that the BLM doesn’t have authority on all things, but the Environmental Impact Statement could</p>	Extensive avoidance, minimization, and mitigation measures are included in the FEIS, summarized in Table 2.7-1 and identified in Appendix C. The BLM can only require mitigation for resources it manages on public land. The Proponents have proposed and included additional mitigation measures voluntarily in cooperation with the BLM. In regard to the additional measures you recommend, the BLM cannot tell private citizens that they may not have dogs or guns though. The contractors would be required to follow all laws, including those covering trespassing, poaching and harassing wildlife. We will pass these recommendations on to the Proponents for their consideration.

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			<p>talk about discussing a specific topic, like the topics below, with the proponent and recommending the proponent establish trainings, education, reprimands and employee guidelines on their own. Proactive approaches to some of these easier tasks will make a more informative and responsible workforce that support's the 2013 State of Wyoming's Energy Policy on stewardship of our natural resources and education advancement.</p> <ul style="list-style-type: none"> • Employees should be required to participate in an Environmental Awareness Training Program. Trespass laws, laws on public lands, and current Wyoming Game and Fish regulations should be covered for the benefit of employees new to the area. o The answer provided by the BLM: CON-1 requires hazardous materials training, REC-1 requires training in identifying noxious and invasive weeds (see Table 2.7) 1). The BLM has no authority to require other training. • Mandatory reprimand should be used in cases of employees convicted of poaching or harassing wildlife while employed by the company, its contractors, or subcontractors. o The answer provided by the BLM: The BLM has no authority to require this. o Once again, the BLM and the proponents need to be proactive here instead of not trying or recommending improvements. • Guns should be prohibited on any job site to prevent harassment or poaching of wildlife. o The answer provided by the BLM: The BLM has no authority to require this. • Dogs should be prohibited on any job site to prevent harassment of wildlife. o The answer provided by the BLM: The BLM has no authority to require this. 	
101025	JOY BANNON	Wyoming Wildlife Federation	<p>Timing Restrictions for Big Game The FEIS offers language on exception requests from timing restrictions. "Requests for exceptions from closure periods and areas will be submitted by the Proponents to the appropriate BLM Field Office in which the exception is requested through the Environmental CIC." (FEIS, Chapter 3, Page 3.10-27)</p> <p>Winter is a critical time for wild ungulates. As such, crucial winter range for pronghorn, mule deer, and elk is often the focus of management and a criterion for analyzing the impacts on big game. Research has shown that timing limitations may not be achieving their desired results.¹ Exceptions are often given to energy companies to allow them to drill and perform development and production activities during winter or critical times when wildlife are particularly vulnerable. WWF requests no exceptions to the timing limitations or stipulations be allowed</p>	Any exception requests will be considered by the BLM Field Offices on a case-by-case basis, taking local wildlife population sensitivities and habitat conditions into account. Any exception requests that could affect listed species would require consultation with the USFWS.

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101025	JOY BANNON	Wyoming Wildlife Federation	Reclamation Reclamation should begin immediately following completion of construction. The FEIS indicates that a reclamation plan will be submitted and approved by the BLM prior to construction, which will cover temporary road decommissioning and restoration. Monitoring will also be required on federal public lands. WWF strongly recommends that the BLM only accept reclamation plans that are to be performed immediately following construction completion with reclamation to be completed within five years. WWF appreciates that our recommendation to the BLM and the proponents to use new straw technologies to reduce erosion, sedimentation, dust control and prevention of noxious or invasive weeds was noted and will be discussed with the proponents. Super Straw is an innovative product that utilizes beetle kill pine and spruce and is free of seeds, chemicals and dust (Sleeping Giant Industries 2011).	This comment is noted. The BLM agrees that prompt restoration efforts are important; however, measures such as planting and seeding require waiting for the proper season. Note that the BLM requires the use of weed free materials, including certified weed free straw and gravel, on federal lands
101025	JOY BANNON	Wyoming Wildlife Federation	Conclusion Overall, Wyoming Wildlife Federation is satisfied with the transmission line segments outlined for Wyoming. We do feel the BLM and the proponents need to take a proactive approach to training proponent staff and finding a solution to aid hunters during the hunting season. Thank you for taking our comments into strong consideration as you move forward with the Record of Decision. Please feel free to contact me to discuss these comments in further detail. Sincerely,	This comment is noted.
101026	LATISHA HULET, TRAVIS HULET		We strongly SUPPORT segment 8 and Segment 9D	Your support is noted.
101026	LATISHA HULET, TRAVIS HULET		OPPOSE the "BLM Preferred Routes" (segment 8 B and 9E and proponent's proposed segment 9) as expressed in the Final Environmental Impact Statement.	Your opposition is noted.
101026	LATISHA HULET, TRAVIS HULET		We live and own property in Melba and will be adversely impacted if the BLM Preferred Routes are adopted for the Gateway West Project. This project is placing a burden on the private property owners, and instead should be routed through BLM ground where the impact is minimal and the benefits that the project will bring to the general public - will exist on "the public's ground."	Noted. Impacts to private property values are assessed in Section 3.4 of the FEIS.
101026	LATISHA HULET, TRAVIS HULET		We own and operate property that produces crops, and our livelihood will be compromised by this proposal. High voltage power lines are a risk for aerial fertilizer applicators and large pieces of farm machinery, compromising our ability to care for our crops and also our ability to operate pivots on our ground. It is unreasonable that the proposed route will take productive farm ground out of use, while infertile stage brush ground that the BLM has jurisdiction over, is being protected. The needs of citizens should be a first priority, rather than the agendas of a few special interest groups.	Section 3.4, Section 3.18, and Appendix K of the FEIS address impacts to agricultural operations. The BLM is not making a decision regarding siting of the transmission line on private land; we do not have that authority. Siting on private land will be determined through state and county permitting processes, and damages to individual properties will be negotiated between landowners and the Proponents, as governed by applicable state and county statutes.
101026	LATISHA HULET, TRAVIS HULET		The noise of the lines can be heard from a long distance and it will ruin the aesthetic aspect of our home, and significantly impact the value of our home and property. We are not comfortable having high voltage power lines near our home, compromising the safety and health of our	Your opposition to the BLM Preferred Routes and support of the Segment 8 Proposed Route and Alternative 9D are noted. Refer to Section 3.21. As shown in figures this section, the electric field generated by a 500 kV line falls to near zero outside the ROW.

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			family. This proposal places an unreasonable burden on private citizens and we disagree with the actions of both Idaho Power and the BLM. For those reasons, we strongly OPPOSE the "BLM Preferred Routes," and strongly SUPPORT segment 8 and segment 9D instead. (right click to copy highlighted text)	Figure 3.21-8 shows audible noise in foul weather can travel further that in fair weather. At the edge of the ROW, it would be as high as 55 dBA (decibels with A rating) in foul weather approximately the level found in an office while in fair weather it would be approximately the level found in library (Tables 3.23-10 to 3.21-12).
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	I. BLM must ensure that the proposal is compatible with protection of the NCA and provide appropriate mitigation for impacts this project may have on the NCA The Federal Land Policy and Management Act (FLPMA) requires BLM to manage public lands under multiple-use principles unless an area has been designated by law for specific uses, in which case BLM must manage the land for those specific uses. 43 U.S.C. § 1732(a). Secretarial Order 3308 reiterates this for the National Conservation Lands by stating that BLM "shall ensure that the components of the NLCS are managed to protect the values for which they were designated, including where appropriate, prohibiting uses that are in conflict with those values. If consistent with such protection, appropriate multiple uses may be allowed, consistent with the applicable law and the relevant designations under which the components were established." As BLM rightfully acknowledges in the FEIS, the NCA "is managed by the BLM under the concept of dominant use rather than multiple use." FEIS at 3-17.20. BLM must prioritize those dominant uses for which the NCA was established over all other uses in the NCA. In order to do this correctly, BLM "determines compatibility of those uses with the purposes for which the SRBOP was established." Id. The purposes of the NCA are "to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural and educational resources and values of the public lands in the conservation areas." 16 U.S.C. § 460iii; Public Law 103-64. Any use that is not compatible with these purposes must either not be authorized or must be regulated or mitigated to be compatible with the enabling legislation.	The BLM Preferred Routes in Segment 8 and 9 generally avoid the SRBOP. The Preferred Route in Segment 8 crosses a 2-mile portion of the SRBOP within an approved utility corridor. The Preferred Route in Segment 9 crosses 8.8 miles of the SRBOP, 6.7 miles of which is in a designated corridor. The BLM finds that the impacts on the SRBOP in these areas can be mitigated to meet the enhancement criteria of the enabling legislation. A proposed land use plan amendment would allow the portion of the Preferred Route in Segment 9 outside of the designated corridor (see Appendix F of the FEIS). Mitigation measures are summarized in Table 2.7-1 of the FEIS.
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	A. Compatibility Review In the FEIS, BLM states that it conducted a "compatibility review" of the legislation establishing the NCA and selected segments 8 and 9 as its preferred alternatives as most consistent with respect to "associated compensatory off-site mitigation." FEIS at 1-5. However, there is no physical compatibility review discussion in the FEIS itself or a separate compatibility review document provided. BLM can and should provide documentation of its analysis of compatibility with the purposes of the NCA legislation. For example, BLM provided a Livestock Impacts Study for the compatibility of grazing with protection of the monument objects in Cascade-Siskiyou National Monument, available at:	The BLM based its review of alternatives in Segments 8 and 9 and their compatibility with the enabling legislation of the SRBOP on the extensive analysis in the FEIS and mitigation measures offered at the time the FEIS was completed. These were presented to the public for review and comment during the 60-day comment period following publishing of the FEIS.

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			http://www.blm.gov/or/resources/recreation/csnm/csnm-impact-study.php . BLM also provided an analysis of recreational target shooting with the management of monument objects in the RMP/EIS for the Ironwood Forest National Monument, available at: http://www.blm.gov/pgdata/etc/medialib/blm/az/pdfs/nepa/library/resource_management/ifnm-feis.Par.46958.File.dat/015_Appendix_I.pdf . Recommendation: We recommend that BLM provide its evaluation of compatibility for public review and comment.	
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	B. Mitigation Measures BLM should provide adequate measures in the EIS to mitigate impacts to the NCA from the project proposal. BLM is required to discuss mitigation measures in an EIS. 40 C.F.R. §§ 1502.14, 1502.16. In general, in order to show that mitigation will reduce environmental impacts to an insignificant level, BLM must discuss the mitigation measures “in sufficient detail to ensure that environmental consequences have been fairly evaluated.” <i>Communities, Inc. v. Busey</i> , 956 F.2d 619, 626 (6th Cir. 1992). Simply identifying mitigation measures, without analyzing the effectiveness of the measures, violates NEPA. Agencies must “analyze the mitigation measures in detail [and] explain how effective the measures would be...A mere listing of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA.” <i>Nw. Indian Cemetery Protective Ass’n v. Peterson</i> , 764 F.2d 581, 588 (9th Cir. 1985), rev’d on other grounds, 485 U.S. 439 (1988).	Extensive avoidance, minimization, and mitigation measures are included in the FEIS, summarized in Table 2.7-1 and identified in Appendix C. Environmental protection measures and off-site mitigation are discussed and assessed as appropriate throughout the FEIS resource sections to ensure environmental consequences have been fairly evaluated. Additional details on mitigation and on the routes in the NCA are included in the ROD.
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	As mentioned in further detail below, BLM Manuals 6100 and 6220 provide BLM with certain directives when considering proposals for rights-of-way in NCAs. These policy manuals require rights-of-way to share, parallel, or adjoin existing rights-of-way as well as mitigating the effects of projects from granting the right-of-way. In addition, the manuals state that “the BLM should work with holders of existing ROWs to consider new, additional, or modified terms and conditions to minimize impacts to the Monument or NCA’s values.” This project provides BLM with the opportunity to directly apply these provisions of the relatively new (issued in July 2012) manuals for the National Conservation Lands.	Manual 6220 states: “District and Field Manager shall: Ensure that all activities on Monument and NCA lands are consistent with the relevant designating legislation...” Similarly, Manual 6100 states: “District and Field Managers...shall: Ensure that all activities within NCLS units are consistent with the relevant designating legislation or proclamation, BLM NCLS policy and guidance, and approved land use plan decisions.” This is the reason that the BLM did not select the proposed routes or other alternatives for Segments 8 and 9. Our review of the EIS indicated that only the Preferred Routes would meet the intent of the enabling legislation. The BLM considered and complied with the direction under Part E of Manual 6220 (Rights-of-Way and Transmission and Utility Corridors) and Part J (Lands and Realty) in selecting the preferred route. A point-by-point review of the direction in Parts E and J demonstrates that the BLM complied with this direction. As required by Manual 6220, Part E, subpart 5, the BLM “to the greatest extent possible” located the routes in existing corridors and will require adequate mitigation.
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS,	IDAHO CONSERVATION LEAGUE, THE	Further, BLM recently released its draft Manual 1794 regarding regional mitigation as an interim policy. See, IM 2013-142. The intent of releasing the policy in this manner is to allow for a period of	Your recommendation is noted. The FEIS states that BLM is considering a phased decision.

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	JOHN ROBISON	WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	<p>implementation in order to learn where the manual can be improved upon and adjusted as necessary. This project provides BLM with the opportunity to apply the content of the manual (which is effective immediately) in a way that both applies and tests the policy directives in this manner. BLM should use Gateway West as a pilot project for implementing the new mitigation policies.</p> <p>There is only one specific mitigation measure discussed and actually adopted in the FEIS which would require frame structures to be equipped with anti-perch devices. FEIS at 3.10-30. The FEIS states that power companies have questioned the effectiveness of this mitigation measure in the past and is "one tool amongst the total minimization/avoidance measures necessary to limit potential impacts." Id.</p> <p>Otherwise, for both segments 8 and 9, the FEIS merely lists management decisions already in the RMP (such as restoring and rehabilitating shrub habitat, suppressing wildfires) and then summarizes these as "restoration and outreach opportunities that could help mitigate for project-related impacts." FEIS at 3.17-20, 3.17-104, 3.17-120. While there are many ideas for mitigation in the FEIS, BLM clearly has not evaluated them in any type of depth yet or developed any specific plan, let alone evaluated a mitigation plan's likely effectiveness for mitigation.</p>	
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	<p>Recommendations: The FEIS justifies selecting segments 8 and 9 by highlighting the conflicts that all of the routes for segments 8 and 9 have with NCA purposes and then concluding that "it is likely" that the preferred routes can meet the enhancement requirements of the NCA legislation. FEIS at 2-47, 2-48. In order to support the conclusion that the preferred routes actually meet these standards, or that any other routes evaluated or chosen may or may not meet these standards, BLM needs to design a mitigation plan and analyze its effectiveness in the EIS. BLM should use interim Manual 1794 to guide the design of its mitigation plan and should look at Gateway West as a pilot project for implementing this draft policy guidance.</p>	Additional details on mitigation and on the routes in the NCA are included in the ROD.
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	<p>II. BLM must follow its own policy guidance on authorizing rights-of-way across the National Conservation Lands</p> <p>BLM's policy manual for the management of National Conservation Lands, Manual 6100, as well as Manual 6220 for the management of national monuments and NCAs, were released in July of 2012. While a host of other BLM manuals are referenced in the FEIS, BLM does not list these highly pertinent manuals as reference documents and does not incorporate the specific measures from these manuals into its management alternatives in the FEIS.</p> <p>Manuals 6100 and 6220 set out specific requirements for rights-of-way and transportation and utility corridors. These manuals contain a strong preference for locating rights-of-way and utility corridors outside of</p>	Manual 6220 states: "District and Field Manager shall: Ensure that all activities on Monument and NCA lands are consistent with the relevant designating legislation..." Similarly, Manual 6100 states: "District and Field Managers...shall: Ensure that all activities within NCLS units are consistent with the relevant designating legislation or proclamation, BLM NCLS policy and guidance, and approved land use plan decisions." This is the reason that the BLM did not select the Proposed Routes or other alternatives for Segments 8 and 9. Our review of the EIS indicated that only the Preferred Routes would meet the intent of the enabling legislation. The BLM considered and complied with the direction under Part E of Manual 6220 (Rights-of-Way and

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			national monuments and NCAs, stating that the BLM “shall exercise its discretion to deny ROW applications in Monuments and NCAs and similar designations if they are inconsistent with the component’s designating authority.” The manuals also state that when BLM is processing a new right-of-way application, the BLM will: a. determine consistency of the ROW with the Monument or NCA’s objects and values; b. consider routing or siting the ROW outside of the Monument or NCA; c. consider mitigation of the impacts from the ROW; d. when processing ROW applications that propose use of a designated transportation or utility corridor that exists at the time of release of this manual, the BLM will consider relocating the transportation or utility corridor outside the Monument or NCA through a land use plan amendment.	Transmission and Utility Corridors) and Part J (Lands and Realty) in selecting the preferred route. A point-by-point review of the direction in Parts E and J demonstrates that the BLM complied with this direction. As required by Manual 6220, Part E, subpart 5, the BLM “to the greatest extent possible” located the routes in existing corridors and will require adequate mitigation.
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	Recommendation: As mentioned in the section above, BLM must perform a proper evaluation of the compatibility of this project with the protective purposes of the NCA legislation. BLM must also explicitly comply with the directives of Manuals 6100 and 6220. Through full compliance, BLM can also set out the standards by which proposed transmission routes will be evaluated in monuments and NCAs, and what will be required to approve such proposals. By doing a thorough job of complying with the directives of the legislation and its own guidance, BLM can both correctly evaluate Gateway West and set a good roadmap for responding to future proposals.	As stated above, the BLM considered and complied with all directives in Manuals 6100 and 6200 in selecting the Preferred Routes in Segments 8 and 9. These routes avoid the SRBOP to the greatest extent possible, and additional mitigation is required to ensure the enhancement criteria of the NCA enabling legislation is met.
101027	BRAD BROOKS, NADA CULVER, DALY EDMUNDS, JOHN ROBISON	IDAHO CONSERVATION LEAGUE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES	Conclusion In its “Dear Reader” letter for the FEIS, BLM discusses the potential for a phased approach to the project in order to allow stakeholders and cooperating agencies to have additional input, and for BLM to conduct additional analysis. We are supportive of this approach as a way to allow for additional evaluation of segments 8 and 9, which impact a host of important values, as detailed in our previous letter of October 12, 2012. We believe that this approach will provide BLM with the opportunity to design the best routes for Gateway West, while also complying with the NCA legislation and setting good precedent for implementing new BLM policy guidance on mitigation and the National Conservation Lands. We look forward to resolving the concerns raised in this letter and participating in the next phase of this project evaluation. Please feel free to contact us with any questions you may have. Sincerely,	Your support for a phased decision and your interest in additional analysis is noted.
101028	JON BELAK, ALEX DAUE, DALY EDMUNDS,ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON	Thank you for accepting these comments on the greater sage-grouse (sage-grouse) Habitat Equivalency Analysis (HEA) for the Gateway West project, as presented in the Final Environmental Impact Statement (EIS). As noted in comments submitted on both the draft EIS and Sage Grouse Addendum, we remain extremely concerned that the Bureau of Land Management (BLM) and U.S. Fish and Wildlife	An HEA is not an “opinion-based approach” as the comment asserts; it is a science-based, peer-reviewed method of scaling compensatory mitigation requirements to potential Project-related effects, measured as a loss of habitat services from pre-disturbance conditions. HEAs have been used by multiple federal agencies to assess project-related impacts and mitigation

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		SOCIETY, ROCKIES	Service (FWS) are utilizing an opinion-based approach instead of a peer-reviewed [Footnote 1], data-driven approach to assess the impacts of development on sage-grouse, habitat services lost, and resulting mitigation needed for the species. Given the BLM's stated intent to use the Gateway West HEA as a template for assessing sage-grouse mitigation for future and ongoing projects, we believe the proposed approach could lead to significant negative impacts on this species.	requirements for other projects in the U.S. within recent years. The HEA used for this project incorporated best available science, and was reviewed by an interagency committee of biologists, which included the BLM, state wildlife agencies, and the USFWS.
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	Sage-grouse are an especially disturbance prone species, with 99% of active leks range-wide in landscapes which have less than 3 percent coverage of developed land types [Footnote 2]. For this species, accurate assessment of habitat services requires assessment of direct, indirect, and cumulative effects, particularly the effect of tall structures on habitat services. Unfortunately, the Habitat Services Metric model (HSM model) used at Gateway West does not adequately incorporate and assess indirect and cumulative effects when evaluating habitat services—making it unclear how the agencies and developer will mitigate for those effects. In practical terms, this will likely lead to undisturbed habitat being undervalued, disturbed habitat being overvalued, and an overall underestimate of the amount of mitigation necessary and the area over which it is required.	The HEA includes cumulative effects from past and present projects but it does not include foreseeable projects. Estimating the spatial extent of foreseeable projects would be problematic since most of these projects have not been fully designed and permitted.
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	This project comes at a critical time for the conservation of greater sage-grouse. This “warranted but precluded” candidate species requires management and protection focused on ensuring local conservation success, in conjunction with an overall strategy to incorporate indirect and cumulative effects and to provide for rangewide persistence for the species. The adoption of objective methods based on the most complete and current science is the key component of such a strategy. We are optimistic that further refinement of HEA for sage-grouse can lead to sound development with lasting conservation benefits. To address and remedy the flaws in the HSM used for Gateway West, we recommended in previous comments that the BLM objectively evaluate the HSM model results against the existing peer-reviewed, data-based greater sage-grouse habitat model created by USGS for the Wyoming Basins Ecoregional Assessment (WBEA) [Footnote 3]. This comprehensive analysis employed sage-grouse habitat use data gathered across the ecoregion to model relative sage-grouse habitat use vs. availability, selecting the best habitat predictors from a large set of candidates using objective methods, incorporating indirect and cumulative effects and scale when estimating habitat services, and making use of improved habitat predictors using readily available data. This model represents the most complete and current habitat suitability analysis for the species. Our main recommendation in previous comments, that habitat services estimated by the HSM model be compared to the publicly available USGS Wyoming Basins Ecoregional Assessment (WBEA) sage-grouse	The sage-grouse habitat model created by the USGS for the Wyoming Basins Ecoregional Assessment (WBEA Model; Hanser et al. 2011) was considered for the Gateway West analysis. It was determined that while the WBEA model may be useful to characterize baseline habitat quality and characterize habitat injury (the left hand side of the HEA equation), it was unable to quantify the benefits of the habitat improvements proposed as mitigation (the right hand side of the HEA equation). This imbalance makes it a poor candidate for a habitat service metric for the Project HEA, which must balance habitat service losses and gains with the same metric.

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			habitat models by an independent group of experts, was not incorporated into the FEIS, leaving us no basis to conclusively evaluate the HSM model performance. Our prior evaluations of both models are still relevant, however, and are detailed below.	
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	<p>Additional recommendations are summarized in Table 1, below, along with a description of the methods used in the DEIS, Sage-Grouse Addendum, and FEIS. Most of these recommendations—build habitat models based on habitat use, statistically evaluate competing predictors and competing models, objectively test competing models, include all potentially relevant effects—are standard best practices enforced through peer review in the research community, and should be non-controversial. The BLM must adopt a HEA process that models actual sage grouse habitat use to identify the strongest habitat predictors. The attempt to define them a priori through an expert opinion process lacks sufficient biological realism and is inherently inaccurate.</p> <p>Table 2, also below, compares the extensive set of predictors used in the WBEA models to those used in the Gateway West HSM model. This comparison highlights the strengths of a model like that used for the WBEA over one based on existing research filtered through expert opinion (e.g. the HSM model used for Gateway West). The WBEA models tested 28 predictors, 19 of these at multiple spatial scales, in order to determine objectively the scale at which both negative and positive impacts on sage grouse habitat influence sage-grouse habitat use. The only predictors retained in the final models were those most effective at explaining the patterns in observed sage-grouse habitat use. Short-range, cumulative effects of disturbance were wrapped into evaluation of habitat services through predictors that quantify disturbance density within various spatial neighborhoods. Although this process of formulating and testing competing predictors and competing models to fit observed data represents the standard of modern ecological research, such testing is not even possible with the structure of the HSM model. This leaves no objective basis to evaluate how any given predictor, or the model overall, is performing and no basis to assess the adequacy of proposed mitigation. When uncertainty exists, the agencies need to make decisions based on sound science and proven methodologies that can be independently validated. The BLM and FWS could have done this at Gateway West by adopting the modeling process used to create the WBEA model. Instead, the proposed HEA has developed no data-based, objective assessment of sage-grouse habitat use against which to make this determination.</p>	<p>An HEA is not an “opinion-based approach” as the comment asserts; it is a science-based, peer-reviewed method of scaling compensatory mitigation requirements to potential project-related effects, measured as a loss of habitat services compared to pre-disturbance conditions. It has been used by multiple federal agencies to assess project-related impacts and mitigation requirements for these projects in the U.S. within recent years. The HEA used for this project incorporated best available science, and was reviewed by an interagency committee of biologists, which included the BLM, state wildlife agencies, and the USFWS.</p>
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL	Two of the 11 predictors included in the HSM model were omitted from testing in some form within the WBEA model framework, and in both cases these omissions are well supported; these predictors should not have been included in the HSM model. First, distance to fences was excluded due to basic inadequacies in existing fence data; deficiencies	The parameters used in the model, as well as their sufficiency for inclusion, were reviewed by an interagency committee of biologists, which included the BLM, state wildlife agencies, and the USFWS.

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		AUDUBON SOCIETY, ROCKIES	<p>that were also acknowledged in the Gateway West DEIS meeting notes (see Table 3). As discussed further below, the choice of distance from fences as a predictor of habitat services for the HSM model seems to have been driven primarily by the desire to pursue fence marking as mitigation. Although properly targeted fence marking has been shown to be effective to prevent sage-grouse collision mortality by a preliminary study, the authors caution that direct inferences to population-level benefits resulting from reduced sage-grouse collision risk cannot be made [Footnote 4]. More fundamentally, fence marking does not provide habitat services; it just potentially removes one source of mortality from fences without affecting increased mortality risk due to providing predator perches or any disturbance effects of fences. Similarly, in the WBEA model distance to occupied leks was also excluded, and lek data were instead used as a means to independently validate the models. Areas with high predicted habitat value in the final WBEA brood and general habitat use models overlapped lek locations with greater than 75% accuracy. A strong argument can be made that it is far more useful to have a model that is predictive of leks than one which includes leks as a predictor; since lek locations are generally known, it is always possible to overlay lek data to modify habitat suitability predictions, and it is a very desirable trait of a model to be able to make accurate predictions about potential sage-grouse habitat services beyond some proximity of known leks.</p> <p>Most of the predictors used in both the HSM and WBEA analyses were quantified in a more effective manner in the final WBEA models. Some of the predictors used in the HSM model, such as slope, were insignificant in the WBEA models in their raw form, but were significant when used in a composite index more predictive of habitat use (Topographic Ruggedness Index). Other HSM predictors, such as sagebrush canopy size, were implied in the more detailed vegetation layers used for the WBEA models, which split sagebrush vegetation into different classes (the HSM model considered all sagebrush types as suitable for sage-grouse, a biologically invalid assumption). Still other predictors used in the HSM model, such as distance to nearest sage or shrub-dominated area, were quantified using metrics more consistent with landscape ecology best practices (sage edge density, patch size, and contagion) but when tested still had little or no ability to predict observed habitat use. The key point again is that with the WBEA model this fine tuning to increase performance can be done, but with the HSM model there's no ability to objectively gauge the effectiveness of any model predictors since variables were chosen based on judgment, not data.</p> <p>Table 3 summarizes predictors used in the Gateway HSM model itself, followed by comments from the meeting notes/FEIS that relate to the choice of each predictor and decisions on scoring, as well as our</p>	

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			<p>recommendations for improvement. The most obvious conclusion that can be drawn from reading the “BLM Comment” field in Table 3 is that there’s actually little basis in the published literature to construct an opinion based model that would accurately estimate sage-grouse habitat services, reinforcing the need for a data-driven model and approach; Table 3 details multiple instances where decisions were made based on incomplete information and group consensus, often with the acknowledgement that scores were not supported by peer-reviewed literature and were being made on a heuristic basis. In these situations, multiple sources of bias can strongly influence outcomes, as detailed by Martin et al (2012): [Footnote 5]</p> <p>Humans are susceptible to a range of subjective and psychological biases (overview in Supporting Information), often unknowingly (Slovic 1999; Kynn 2008; McBride & Burgman 2011). Motivational biases arise from the context of the expert, personal beliefs, and from the personal stake one might have in a decision. Accessibility biases arise when information that comes more easily to the mind of an expert exerts a disproportionate influence on an expert's judgments. Anchoring and adjustment biases occur when an expert anchors an estimate on a benchmark and then is unable to adjust this estimate much above or below the benchmark. Overconfidence bias arises when the confidence of experts in their judgments is higher than is warranted by the accuracy of their estimates (McKenzie et al. 2008). This bias sometimes results in systematic underestimation, in which experts fail to express the extent of uncertainty (O’Hagan et al. 2006).</p> <p>In the context of evaluating habitat services, these sources of bias are best avoided by use of an objective modeling process driven by observed species use of habitat in relation to a broad set of predictors, including all relevant types of disturbance and quantified across a range of scales. When a full suite of predictors is tested against the data, predictors that are not useful and their associated biases drop out due to their negative impacts on predictive power. The HSM model, since it is entirely expert opinion-based and has not been objectively verified by any independent data, cannot be disentangled from these biases due to its basic structure. Previous comments detail the extreme influence that inaccuracy and bias can have in HEA model results when projected out over time [Footnote 6], and how this can result in grossly inadequate mitigation [Footnote 7]. With the proposed HSM model, there are no analytical safeguards to prevent this from happening, and in fact, as noted in most detail in previous comments by The Nature Conservancy, the model scoring is structured so that restoration of poor quality habitat as mitigation for the loss or impairment of high quality habitat is likely. In other words, all information indicates the HSM model is biased, and that these biases in the model will lead to inadequate mitigation.</p>	

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101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	The BLM's responses in Appendix L note that while the WBEA model is useful for characterizing habitat quality and quantifying habitat injury, it was not designed to specifically address power line impacts, particularly in terms of being able to quantify the benefit of proposed mitigation projects with respect to the habitat lost or degraded through development. This is a key point, and there are several valid counter-responses. The most obvious is that equivalency has not been established for most of the proposed mitigation methods, as discussed further below, and that is the exact reason why the current Habitat Equivalency Analysis for Gateway West, which is entirely based on assumptions, represents such an unacceptable risk at this time. Second, it was notable that the final WBEA models both contained the predictor "decay distance to transmission lines within 0.5 km" as a highly significant predictor. Although the models were not specifically designed for a transmission project, they are clearly sensitive enough to detect impacts of existing transmission on sage grouse habitat use, and as repeatedly stated, the approach of testing variables rather than excluding them based on inadequate support in the literature is the one that needs to be taken over the approach taken of modeling only those habitat service losses that could be defensively quantified using existing literature, literature which everybody agrees is not adequate. It's true that revisiting the WBEA model process for Gateway West and other potential projects that affect sage-grouse within the ecoregion would produce a more accurate result tailored to the specific development context. This is not a full re-invention of a process, however, but rather an iteration of an existing process with modified inputs and possibly a few new ones.	The intergovernmental committee of biologists that developed the HEA believes that it is an appropriate tool for modeling certain mitigation options and this is what it was used for. It is correct that the HEA cannot measure the effectiveness of all mitigation measures. As noted above, the committee included biologists from the BLM, Idaho and Wyoming State wildlife agencies, and the USFWS.
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	The HEA fails to include any predictor of disturbance effects of tall structures, including transmission lines, on the species. Overall, the WBEA models tested a wide range of thoughtfully constructed predictors against sage-grouse habitat use data. Of the variables tested and found to be highly effective in the WBEA models that were not used in the HSM model, the most important omission was any predictor to assess disturbance effects from power lines and tall structures themselves. The meeting notes state that decay distance from power lines was not included in the HSM model due to the consensus of the interagency group that existing research is not sufficient to show power lines have an impact on the species. This conclusion is at odds with the findings of a recent, rigorously designed study that found greater sage-grouse avoid areas within 600 m of transmission lines [Footnote 8], and also conflicts with numerous studies that, although they were not able to completely control for other disturbance effects to isolate the effects of tall structures themselves, strongly associated negative impacts on greater sage-grouse with human disturbance and with transmission infrastructure [Footnote 9, 10]. The	The committee of biologists that developed the HEA considered the effects of tall structures on sage-grouse when developing the HEA; however, currently there are no quantitative scientifically supported spatial data that could be used to qualify the exact extent of impacts that could occur to sage-grouse as a result of tall structures. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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			group's conclusion is also at odds with the FWS [Footnote 11] assertion that avoidance impacts of transmission lines on prairie grouse species are essentially the same; if the FWS is correct, the multiple studies that have documented negative effects on lesser prairie chicken are also relevant. Finally, decay distance from power lines within a half kilometer was highly predictive as a negative influence on sage-grouse habitat use in the WBEA models. The fact that a key conclusion of the data-based WBEA approach, which as detailed above represents the best available analysis for over 50% of the project area, is directly at odds with assumptions made for the Gateway West HEA on the basis of expert opinion indicates that this assumption of the HSM model is not supported by the most current, peer-reviewed science.	
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	<p>Habitat Services Cannot be Defined for Experimental Restoration or Fence Marking</p> <p>As mentioned above, some predictors in the HSM model either have no relationship with habitat services or a relationship that cannot be defined based on current research. We assert that such predictors fundamentally have no place in a model to evaluate habitat services for a HEA. In particular, fence marking, conifer removal, and bunchgrass/forb seeding were chosen because they mirror ongoing priority habitat restoration efforts, and they are chosen in the FEIS as the preferred mitigation approaches for the project. No relationship is explained between how many marked spans of fence, removed conifers, or seed applications equates to each acre of habitat developed. As a result, we see no basis to make these judgments, making these predictors unsuitable for use in determining habitat equivalency until such relationships are established. This would require linking this proposed mitigation to sage-grouse productivity and survivorship through well-designed research. Some of this is ongoing through the NRCS Sage-Grouse Initiative, but is still in initial stages.</p>	Fence marking is not currently included in the mitigation being offered. Appendix J to the FEIS explains how this item was modeled.
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	<p>Conclusion</p> <p>As previously stated, this project comes at a critical time for the conservation of greater sage-grouse. This "warranted but precluded" candidate species requires management and protection focused on ensuring local conservation success, in conjunction with an overall strategy to incorporate indirect and cumulative effects and to provide for rangewide persistence for the species. The adoption of objective methods based on the most complete and current science is the key component of such a strategy. We are optimistic that further refinement of HEA for sage-grouse can lead to sound development with lasting conservation benefits.</p> <p>If the tools needed to implement sage-grouse HEA are not developed to their full potential, however, and the HEA approach used for Gateway West is allowed to become a template for future projects, agencies will be missing a huge opportunity to contribute to sage-grouse</p>	Undertaking new research studies into the accuracy of various variables to predict impacts to sage-grouse beyond the scope of this assessment. Best available science based on literature available at the time the HEA was developed was used. The HEA was developed and reviewed by an interagency committee of scientists.

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			<p>conservation. It is vital for the recovery of this candidate species to set a high bar in terms of scientific credibility and conservation effectiveness. Adaptive management with a focus on preserving high-quality habitat is the key to effective conservation of sage-grouse and other sagebrush obligate species. To accomplish the ambitious conservation goals required of this analysis, HEA must be finely honed tool with the level of precision and accuracy needed to be responsive to changes in habitat that are meaningful to the species itself.</p> <p>We are available to clarify these comments and would be happy to meet with you to learn what steps the BLM and the proponents are taking to address our concerns. Thank you for the opportunity to comment on this precedent-setting analysis, which we believe must continue to evolve to make it an effective tool for both conservation and development.</p>	
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	<p>The emphasis of a HEA, as typically formulated, is on establishing equivalency between impacts and mitigation used to compensate for those impacts. In the cold desert sagebrush ecosystem where this mitigation approach is currently being implemented, however, this equivalency of x units of effort producing x units of sage-grouse habitat services has not been established at all, or is at best very tenuous. In addition, restoration in these water-limited areas is inherently risky, and it's uncertain how successful restoration can be at the landscape scale given climate change and drought. Wisdom et al (2003) [Footnote 12] assert that retaining and protecting high quality sagebrush habitat is more effective, efficient, and economical than attempting to restore habitats already degraded by cheatgrass invasion, fire, and juniper encroachment. Given this uncertainty in the equivalency and projected benefits, the emphasis in sage-grouse HEA analyses should be on identifying and protecting intact habitat and on evaluating habitat value in both development and mitigation areas with the highest level of accuracy possible, not on specifying restoration to offset impacts. The approaches above are promising and should be pursued, but until equivalency with respect to habitat loss and degradation can be firmly established for sage-grouse, these types of mitigation are inappropriate in the context of mitigation used to provide habitat services for a Habitat Equivalency Analysis. A HEA for this candidate species should focus on precise evaluation of habitat services to be developed with respect to habitat used for mitigation. We strongly support the full development of such an approach.</p>	The absence of firm proof that the mitigation will be sufficient is not a reason to not include mitigation. The HEA incorporated the best available science. It was developed and reviewed by an interagency committee of scientists.
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY,	<p>Table 1: Summary of Past Recommendations [table below formatted as follows: Recommendation -- Gateway West DEIS Methods -- Gateway West FEIS Methods] Incorporate all relevant indirect effects possible at the appropriate scale when estimating habitat quality of areas proposed for development. -- Only noise, human presence, fences, and roads were incorporated in the impacts analysis, and only proxies for these</p>	Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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		ROCKIES	<p>effects as represented by distance from nearest feature were used in the HSM model. -- No change. Baseline habitat service level does not account for all habitat service losses associated with existing environmental disturbances, and the FEIS states that omission of these disturbances is a conservative approach to the analysis of Project-related habitat service losses since the analysis assumes that the habitats affected by the Project are of higher-quality than they actually are, and so requires a greater amount of mitigation to offset Project-related habitat service losses.</p> <p>When using distance-based predictors, instead of using distance to nearest feature as a predictor, use feature density within a set of spatial neighborhoods and test the predictive power of each to determine which is most predictive for sage grouse habitat use. -- 5/11 predictors in the model were based upon distance to the nearest feature (highway, road/well pad/mine, fence, occupied lek, and sage/shrub dominant vegetation). Predictors that instead incorporated feature density per unit area were discussed but not used. -- No change</p> <p>Include all relevant indirect and cumulative effects when evaluating habitat services; Disturbance has a strong effect on sage-grouse habitat selection, and the indirect and cumulative effects of disturbance must be incorporated into evaluation of habitat services; the absence of published studies on disturbance effects does not justify excluding them from consideration, it means that these relationships must be modeled using the best available data. We recommend use or adaptation of the model developed for the USGS WBEA that used sage-grouse pellet counts as a proxy for habitat use and tested the influence of disturbance on habitat use over various spatial extents. -- The DEIS Supplemental states HEA is a method to quantify loss of habitat services and define mitigation rather than an impacts analysis. The Framework for Sage-Grouse Impacts Analysis for Interstate Transmission developed limits disturbance to one per 640 acre section to justify not considering cumulative impacts, and includes only noise and human presence as potential indirect impacts to habitat services. Transmission structures, while present, are assumed to only affect habitat quality in terms of habitat removed by tower foundations; the ROW is assumed to return to 95.8% of the original habitat service value. Tertiary roads were not included by group consensus. Disturbance-based predictors do not express disturbance density and were assigned values through expert opinion. The meeting notes detail the group's explicit decision to exclude indirect impacts from the HEA (DEIS page F-15), and also note that this change allowed the study corridor width to be decreased from 18 km to 9 km (F-24). -- No change</p>	

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101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	Table 2: Comparison of Wyoming Basins Ecoregional Assessment Sage-Grouse Model with Habitat Services Metric Model [see attachment	The sage-grouse habitat model created by the USGS for the Wyoming Basins Ecoregional Assessment (WBEA Model; Hanser et al. 2011) was considered for the Gateway West analysis. It was determined that while the WBEA model may be useful to characterize baseline habitat quality and characterize habitat injury (the left hand side of the HEA equation), it was unable to quantify the benefits of the habitat improvements proposed as mitigation (the right-hand side of the HEA equation). This imbalance makes it a poor candidate for a habitat service metric for the Project HEA, which must balance habitat service losses and gains with the same metric.
101028	JON BELAK,ALEX DAUE,DALY EDMUNDS, ERIN LIEBERMAN	THE WILDERNESS SOCIETY, DEFENDERS OF WILDLIFE, NATIONAL AUDUBON SOCIETY, ROCKIES	Table 3: Summary of HSM Model Predictors and Recommendations [table below formatted as follows: Predictor -- Predictor Value (3,2,1,0) -- BLM Comment -- Recommendation] Distance to interstate or US highway (m) -- >5000, 700-5000, 100-700, <100 -- Scoring "not perfectly supported in the peer-reviewed literature" (FEIS App J) -- Retain distance to nearest roads, but also use road density and test this within various spatial neighborhoods Distance to county highway, surfaced high-use road, well pad, or mine footprint (m) -- >200, 50-200, 25-50, <25 -- Scoring "not perfectly supported in the peer-reviewed literature" (FEIS App J) -- Retain distance to nearest roads, but also use road density and test this within various spatial neighborhoods Distance to fence (km) -- >2, 0.4-2, <0.4, NA -- The minimum value of 0.4 km was based on preliminary results of an ongoing fence marking study that did not examine strikes vs. distance to lek. The highest values in were based on guidelines from two general sage-grouse management papers. The middle value was assigned using a linear relationship. The meeting notes detail problems with this predictor (effects are site specific and close range, fence data are generally inaccurate and incomplete) and suggestions to use fence density in place of distance to nearest fence, but there were no changes. -- This predictor reflects the relatively recent interest in using fence marking for mitigation, an approach that makes intuitive sense and has been shown to be effective in reducing collision mortality when properly targeted, but provides no sage-grouse habitat services and has an unknown equivalency with respect to habitat loss and/or degradation; determining the number of spans to mark to offset each unit area of habitat lost or degraded is not possible to address given current knowledge, as acknowledged in Stevens et al. (2013). Given that, this form of mitigation should be pursued in contexts other than HEA. Distance to occupied lek (km) -- 0-5, 5-8.5, .8.5, NA -- Current sage-grouse habitat management guidance uses occupied leks as focal points for nesting habitat management, so distance to lek was used as a variable in the Habitat Services Metric. -- BLM uses recommended guidelines for lek protection along with three different radio collar studies to arrive at	Conducting additional research is beyond the scope of this EIS. This analysis is based on best available science available at the time the HEA was developed. The offered mitigation does not include fence removal and marking. Sage-grouse use data were not available for all areas. Data on occupied leks were the best available information for all areas; therefore, they were used to determine use. The data on leks were provided by the state agencies and updated where additional information was available. The interagency committee of biologists determined that slope was an appropriate metric to use.

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			<p>distance values for scoring. Instead, use observed grouse use data to test the ability of distance to the nearest lek and lek density within various neighborhoods to predict sage-grouse habitat use. Distance to sage or shrub dominant area (m) -- <90, 90-275, >275, NA -- This was included since sage-grouse use other shrub types for escape cover during brood rearing, and the values were derived from loosely applying guidelines and recommendations from two sources (Lincoln County s-g technical team and Stiver et al. 2010). -- As above, generate multiple versions of the predictor and test their ability to predict observed grouse habitat use, as has been already done already in the WBEA sage-grouse model. % slope -- <10, 10-30, 30-40, >40 -- Areas less than 5% slope were assigned the high score, with those exceeding 10% intervals subjectively assigned after that and areas with greater than 40% unsuitable (0). -- Slope was tested in the WBEA model and had no power to predict observed sage-grouse habitat use, but Topographic Ruggedness Index, a neighborhood-based index more typical of modern GIS-based predictors, was significant. % sagebrush cover -- 15-25, 5-15 or >25, <5, NA -- In general, the recommended sagebrush cover for nesting habitats was intermediate to and overlapped that of brood-rearing and winter habitats. Thus, favorable conditions for nesting were given the highest scores for percent sagebrush cover in the sage-grouse habitat services metric. The sagebrush cover scores assigned for nesting habitat in the sage-grouse habitat assessment framework by Stiver et al. (2010) to different sagebrush cover categories were assigned to this variable. -- This metric has the strongest link to sage-grouse habitat services based on existing research, but nesting habitat requirements were subjectively prioritized in the scoring based on conjecture about seasonal habitat overlap. Variables should be tested for their power to predict different types of habitat use. % bunchgrass cover -- 5-15, 2-5 or >15, <2, NA -- Literature reviewed defined an optimum range of bunchgrass cover for nesting and brood rearing; above and below this ideal range, lower scores were assigned subjectively with no support. -- The WBEA study methods define separate models for brood/nesting habitat and general habitat since brood pellets are easily differentiated from general habitat use pellets due to clustering. The brood/nesting habitat model would be ideal for exploring bunchgrass as a habitat predictor. Sagebrush patch size (ha) -- >130, 10-130, <10, NA -- A 130-hectare (ha) patch size for sagebrush was used as the recommended service condition (score of 3) based on professional judgment. Professional judgment was used because "conclusive data are unavailable on minimum patch sizes necessary to support viable populations of sage-grouse" (Connelly et al. 2011). -- As above, generate multiple versions of the vegetation predictors and test their ability to predict observed grouse habitat use, as has been already done already in the WBEA sage-grouse model. Sagebrush canopy</p>	

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			height (cm) -- 30-80, 20-<30 or >80, <20, NA -- The sagebrush canopy heights that provided high quality nesting habitat generally also provided high quality winter habitat, thus favorable conditions for nesting were given the highest scores overall. -- As with sagebrush cover, although values are based on research, nesting habitat requirements were subjectively prioritized in the scoring based on conjecture about seasonal habitat overlap. Variables should be tested for their power to predict different types of habitat use Vegetation -- NA, NA, All Other Veg Types, Forested Open Water Roads Well pads Mine Footprints -- Habitats typically avoided by sage-grouse (roadways, urban, open water, forest) were scored zero to give them no habitat service value in the output. -- This layer was included as a screen and basically contributes nothing to the scoring beyond eliminating areas known to be unsuitable.	
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	I. BLM Should Take the Time Needed to Fix Major Problems with Its Approach to Compensatory Mitigation for Sage Grouse Impacts. These comments point out serious flaws in the FEIS' approach to compensatory mitigation of the sage grouse impacts of the Gateway West Project. We respectfully request that BLM establish an inclusive process to fix these problems that draws on policy and scientific experts from the project proponents, key wildlife and resources agencies, and stakeholders experienced in mitigation science and practice. We are convinced that these concerns can be resolved through a purposeful and constructive engagement with the goal of producing a biologically effective and economically feasible compensatory mitigation plan. The stakes are high. The Gateway West Project will set crucial precedents regarding BLM's approach to infrastructure mitigation at a time when the federal and state governments are working to establish "adequate regulatory mechanisms" that can avoid the need to list sage grouse under the Endangered Species Act. Progress on other fronts is promising. The BLM has just issued draft Manual [Footnote 1] provisions that represent a major step forward in off-site compensatory mitigation planning and implementation. The State of Idaho has advanced a state sage grouse conservation alternative that adopts the Idaho Mitigation Framework to offset infrastructure impacts. In Idaho, where large swaths of sage grouse habitat are being lost nearly every year to fire and invasive plants, it is critical that we develop policies and funding sources that can replace some of that habitat being lost. Utility companies, conservationists, ranchers, and everyone linked to our rangelands have a stake in developing effective compensatory mitigation programs. The FEIS undermines this progress at a critical time. The major categories of sage grouse impacts – long recognized by the BLM as well as state and federal wildlife agencies – are simply excluded from the compensatory mitigation plan. The costs and benefits of mitigation actions are stipulated with little analysis and few procedures to ensure	Mitigation plans are included in Appendix C of the FEIS. Following comments on the FEIS, the Proponents completed an HEA for indirect effects and have offered additional mitigation for direct and indirect effects. The FEIS disclosed that, even with the proposed mitigation, there would still be adverse impacts. The extensive mitigation measures were developed through an inclusive process that drew on policy and scientific experts with significant input from stakeholders during the DEIS and FEIS comment periods, as well as the public comment period for the Addendum to the DEIS regarding effects on greater sage-grouse. Additional stakeholder outreach included a conference call to discuss mitigation options for sage-grouse, held in November 2012 with non-governmental organizations and the sage-grouse HEA working group.

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			that those actions will actually accomplish the expected benefits. Some proposed mitigation actions, such as fence marking, are inappropriate to offset the type of impacts associated with Gateway West. The result of the FEIS would be that hundreds of miles of transmission lines will be placed in sage grouse habitat with compensatory mitigation that is incomplete and insufficient. No one's long-term interest is served by this outcome. The BLM has the time to remedy this situation. With the time that remains between the FEIS and the issuance of Notices to Proceed, we ask the BLM to: (1) reach out to the project proponents to request their support for a more open process on compensatory mitigation; (2) re-open certain elements of the Habitat Equivalency Analysis (HEA); (3) integrate indirect impacts into the compensatory mitigation analysis and (4) align the mitigation for this project with the planning approaches described in the BLM's draft Manual provisions and Idaho's Mitigation Framework	
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	II. The FEIS Fails to Mitigate for Significant Impacts to Sage Grouse and Their Habitats. The compensatory mitigation package for the Gateway West is based on a Habitat Equivalency Analysis (HEA) set forth in Appendix J-2 of the FEIS. The document describes the HEA as a "standardized method to determine a one-to-one ratio [of] habitat services lost to habitat services mitigated." [Footnote 2] The project proponents, acting at the direction of BLM, used the HEA-generated sum of habitat services lost to develop a package of compensatory mitigation projects. As explained below, the compensatory mitigation recommendations that emerged from the HEA process do not even come close to providing one-to-one mitigation for habitat services lost because the most significant project effects on sage grouse were excluded from the HEA analysis. The project impacts that were incorporated into the HEA included the permanent and interim loss of sage grouse habitat services as a result of vegetation loss, noise and human presence anticipated with project construction and operation as well as the physical footprint of project structures. The central flaw in the HEA is that it encompasses only a small portion of the sage grouse impacts that the U.S. Fish and Wildlife Services (USFWS) has linked to transmission lines. 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 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	Your comments are noted. We agree that mitigation is needed for indirect effects of the project. Following comments on the FEIS, an HEA was completed to determine what mitigation was needed to offset indirect effects. Mitigation for impacts is included in the plans attached to the ROD. We believe that the HEA is an appropriate tool for determining mitigation for both direct effects, and this is supported by the interagency committee that reviewed the analysis. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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			<p>road access allowing poaching/hunting in previously inaccessible locations, and changes to habitat structure resulting from altered fire regimes [Footnote 3]. None of the first six factors listed by USFWS are considered in the HEA and are therefore excluded from the mitigation package developed by the project proponents. This means that the HEA model fails to account for the synergistic and cumulative impacts of this transmission line, especially the indirect impacts of placing permanent and tall infrastructure in previously unaltered high quality habitat. For ease of reference, these excluded effects are referred to here as “indirect impacts.” Even though indirect impacts are not integrated into the HEA, the FEIS acknowledges they exist. For example, the FEIS quotes repeatedly from Connelly et. al. (2000) that “analysis of sage-grouse populations that attend leks within 18 kilometers (11 miles) of the Project is a critical component of an impacts analysis for the species because these sage-grouse may be indirectly affected by the loss of habitat functionality during other seasons of the year (Connelly et.al. 2000).” (emphasis added) The FEIS also recognizes indirect effects, stating that “Long-term beneficial effects (of decommissioning) would include the removal of tall structures (towers) from grouse habitats, and the decommissioning of Project facilities and access roads, both of which could increase the connectivity and size of wildlife habitat.”</p> <p>[Footnote 4] The FEIS’ recognition of the existence of indirect effects has ample scientific support. The U.S. Geological Survey’s recently issued Baseline Environmental Report (BER; Manier et al. 2013) [Footnote 5] provides a recent summary of research showing that the effects of transmission lines far exceeds their direct “footprint” and construction effects. While the evidence is not extensive, the report provides a clear rationale for including indirect and cumulative effects in the compensatory mitigation plan. The relevant selection from the BER report is set forth below: Transmission- and distribution-line construction (power lines) may result in substantial indirect habitat loss (that is, avoidance) due to sage-grouse avoidance of vertical structures, potentially because of changes in raptor concentrations and raptor species’ composition relative to perches on flat landscapes. Additionally, the tendency of sage-grouse to fly relatively low, and in low light or when harried, may put them at a particularly high risk of collision with lines. The erection of a transmission line located within 650 ft (200 m) of an active sage-grouse lek, and between the lek and day-use areas, in northeastern Utah resulted in a 72 percent decline in the mean number of displaying males and an alteration in daily dispersal patterns during the breeding season within 2 years (Ellis, 1985). This project also reported that the frequency of raptor–sage-grouse interactions during the breeding season increased 65 percent and golden eagle interactions alone increased 47 percent between pre- and post-transmission line comparisons (Ellis, 1985). Negative effects of power lines on lek</p>	

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			<p>persistence were documented in northeastern Wyoming; the probability of lek persistence decreased with proximity to power lines and with increasing proportion of power lines within a 4 mi (6.4 km) window around leks (Walker and others, 2007a). Braun (1998b) reported that use of areas near transmission lines by sage-grouse increased as distance from transmission lines increased up to 1970 ft (600 m). Sage-grouse avoided brood-rearing habitats within 2.9 mi (4.7 km) of transmission lines in south-central Wyoming (LeBeau, 2012). Power line collisions accounted for 33 percent of juvenile (1st winter) mortality in low-elevation areas in Idaho (Beck and others, 2006). In general, it appears sage-grouse may avoid habitats within 0.4–2.9 mi (0.6–4.7 km) of a transmission line, and erection of a transmission line close to a lek will negatively influence sage-grouse lek attendance and breeding-season behavior. Additionally, higher densities of power lines within 4 mi (6.4 km) of a lek may negatively influence lek persistence. Power lines may be locally significant causes of mortality due to collisions. Potentially more important, poles and towers associated with transmission lines have been shown to influence raptor and corvid distributions and hunting efficiency resulting in increased predation on sage-grouse (Steenhof and others, 1993; Connelly and others, 2004). Foraging distances of avian, sage-grouse predators have been estimated at 4.3 mi (6.9 km; Knick and Connelly, 2011a), suggesting that transmission and power lines may influence sage-grouse at large spatial scales (Connelly and others, 2004; Cresswell and others, 2010). Based on these data, the direct footprint within any given MZ is relatively small (1.1–5.0 percent; table 8), but the area of relative influence is more extensive (25.2–62.8 percent PGH; table 8). (emphasis added) This conclusion is backed by a significant body of scientific research, including both peer reviewed publications and significant additional evidence, discussing the effects of transmission lines and tall structures on sage grouse habitat. These effects include habitat fragmentation and habitat loss caused by behavioral avoidance of transmission corridors. In particular, the U. S. Fish and Wildlife Service issued a briefing paper titled “Prairie Grouse Leks and Wind Turbines: U.S. Fish and Wildlife Service Justification for a 5-Mile Buffer from Leks” (2004) which places sage grouse and prairie grouse in the same “prairie grouse” category, and concludes that the avoidance impacts from vertical structures to both species are the same. This guidance goes on to say that “the Service feels it is important to clarify that avoidance of vertical structures by grassland and sage steppe-obligate wildlife is not a new issue.” As we explained in our comments on the DEIS, peer-reviewed studies conducted on other North American grouse species with similar life history traits to the sage grouse (i.e., the lesser and greater prairie-chickens) have shown that the birds’ use of quality habitat is reduced when tall structures are located nearby, because prairie grouse instinctively avoid tall structures (Manes</p>	

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			et al. 2002). Three additional peer-reviewed studies found additional relevant evidence. In Utah, golden eagle predation of sage grouse increased from 26% to 73% (of total predation) after a transmission line was constructed within 200 yards of an occupied lek. The lek was extirpated and the author concluded that the presence of the transmission line resulted in both changes in sage grouse dispersal patterns and fragmentation of the habitat (Ellis 1985). In Kansas, the average displacement of prairie-chicken use areas was about 450 meters from power lines and the average displacement of nests was about 650 meters from power lines (Hagen et al. 2004). In Oklahoma, the displacement of lesser prairie-chickens from a power line was at least 500 meters (Pruett et al. 2009). Other studies not published corroborate this evidence. In California, power lines resulted in sage grouse lek abandonment and reduced lek attendance up to 3 miles away from the lines (Rodgers 2003). In Colorado, pellet transects illustrated declining habitat use by sage grouse up to 600 meters from power lines (Braun 1998). In Washington, 19 of 20 leks (95%) documented within 7.5 km of 500 kV power lines were abandoned by the birds. In contrast, the vacancy rate for leks further than 7.5 km is 59% (22 of 37 leks) (Schroeder 2010). Based on this body of scientific research, we conclude that any attempt to limit the compensatory mitigation package to direct and construction/operation impacts explicitly ignores the main influences of a transmission line on sage grouse habitat.	
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	III. The Compensatory Mitigation Plan Should Include Indirect Impacts. The FEIS' rationale for narrowing the HEA to just direct, construction, and operation impacts is that indirect impacts, such as predation, fragmentation, invasive species, etc., are difficult to quantify within the HEA model. Importantly, the FEIS never contends that these effects are non-existent or insignificant. [Footnote 6] Instead, they are excluded because they are difficult to tally within the specific model the agency selected for scaling project mitigation. Rather than weigh these effects in the mitigation analysis, the agency states that "indirect impacts to sage-grouse and their habitats are qualitatively assessed" outside the scope of the HEA process. Thus, the FEIS effectively concedes that the HEA does not capture the full range of impacts of the project. We understand that indirect impacts can be difficult to quantify precisely but disagree that this is an adequate basis for entirely failing to mitigate for them. It is insufficient for the FEIS to state that, because the indirect effects of hundreds of miles of transmission line cannot be "accounted" for in the HEA, no mitigation of any sort for those impacts is necessary. Although there may be a range of uncertainty regarding the extent of indirect impacts, that range does not include a "zero effect." This situation calls for BLM to exercise its judgment and determine how to account for indirect effects in the mitigation package – either within the HEA or, preferably, as an	Mitigation plans are included in Appendix C of the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The FEIS disclosed that, even with the proposed mitigation, there would still be adverse impacts. The fact that there are unavoidable impacts does not mean a project cannot be approved. One of the purposes of an EIS is to disclose the unavoidable adverse impacts of a project in order for the responsible officials to weigh the benefits against the impacts and make an informed decision.

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			additional component of the mitigation analysis. The BLM's Framework for Analyzing Sage Grouse Impacts, prepared prior to the draft EIS, states that it is reasonable to make predictions about indirect impacts: Qualitative and quantitative measures of habitat change must be considered in describing the potential impacts of the project. In the context of managing a species that requires such a large landscape of habitats to meet their lifecycle needs, and the nature of the proposed disturbance, it is reasonable to make some assumptive predictions about the relative impacts within 18km. [Footnote 7] The FEIS itself at one point appears to contemplate a quantitative approach to assessing indirect impacts: The general Analysis Area used for wildlife habitat mapping (see Section 3.11.1.4) consisted of a 1,000-foot-wide area centered on the Proposed Route and Route Alternatives (500-foot-wide on either side of the centerline of each route).... While most of this Analysis Area would not be directly impacted by the Project, information gathered for this larger area allows for an understanding of the context in which the impacts would occur and allows an assessment of indirect effects. [Footnote 8] Our concern is that neither this nor any other approach for assessing indirect effects (other than construction noise) was ever incorporated into the compensatory mitigation analysis. We request that BLM work with the project proponents, federal and state experts, and stakeholders to develop a defensible approach to compensating for indirect effects prior to issuing notices to proceed for the project.	
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	IV. Scientific Research Documents Quantifiable Indirect Impacts and Serves as a Basis for Incorporating These Impacts into the Compensatory Mitigation Plan. The following table summarizes studies of indirect effects of transmission lines on sage grouse, including reproductive behavior, predation, and vital rates. Although these studies discuss impacts at different distances from transmission lines, they all come to the same conclusion that these impacts are real and detrimental. Taken together, these studies provide a reasonable starting point for quantifying how indirect impacts can be integrated into the compensatory mitigation package. A Literature Review of Transmission Line Effect Distances [table below formatted as follows: Effect Distance Value -- Source -- Comments] No effect detected at 5 and 18km of a lek -- (Johnson et al. 2011) -- Authors examined trends in lek counts and anthropogenic features (1997-2007). No general pattern/association was found across the entire study area with transmission at tested 5km and 18km of lek. 200 m -- (Ellis 1985) -- The erection of a transmission line located within 650 ft (200 m) of an active sage-grouse lek, and between the lek and day-use areas, in northeastern Utah resulted in a 72 percent decline in the mean number of displaying males and an alteration in daily dispersal patterns during the breeding season within 2 years. This project also reported that the	We agree that mitigation is needed for indirect effects of the project. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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			<p>frequency of raptor–sage-grouse interactions during the breeding season increased 65 percent and golden eagle interactions alone increased 47 percent between pre- and post-transmission line comparisons. 360 m +/- 60, 630 m +/- 40 -- (Robel et al. 2004) -- Data are from a 6 year study of energy development on lesser prairie-chickens in Kansas. Distances are mean (+/- SE) distance to electric power lines avoided by 90% of 187 nesting prairie checking and mean distance to power lines across which 95% of 18,866 telemetry locations of prairie chickens were absent, respectively. 450-650 m -- (Hagen et al. 2004) -- In Kansas, the average displacement of prairie-chicken use sites was about 450 meters from power lines and the average displacement of nests was about 650 meters from power lines. 400m -- (Pitman et al. 2005) -- Data are from a study on lesser prairie-chickens in Kansas and found that nest proximity was “seldom less than 400 meters from a transmission line” (Table 3) 500m -- (Hanser et al. 2011) -- Wyoming Basins Ecoregional Assessment: Study of responses of sage-grouse to anthropogenic effects. Authors tested effects at .5 km and 1km and found the most significant effect of transmission lines on sage-grouse abundance at .5 km. 500m -- (Pruett et al. 2009) -- Oklahoma prairie-chicken study found that displacement of prairie-chickens was at least 500m from a power line. 600 m -- (Braun 1998) -- In Colorado, pellet transects illustrated declining habitat use by sage-grouse up to 600 meters from power lines. 600 m -- (Gillan et al. 2013) -- Using a spatial statistical approach with telemetry data from Idaho, this study found that sage-grouse avoided power transmission lines by 600 m. 0-4.7 km - (LeBeau 2012) -- A wind turbine effects and infrastructure study that examined infrastructure related to wind development within the two study areas in SE Wyoming and found that the estimated odds of sage-grouse selecting brood-rearing habitat within the Seven Mile Hill study area increased as distance from nearest overhead transmission line increased up to 4.7 km (90% CI: 2.2–18.5 km), then declined. However, LeBeau also found that sage-grouse selected for nesting habitat closer to transmission lines within Simpson Ridge study area. 4.8 km -- (Rodgers 2003) -- In California, power lines resulted in sage-grouse lek abandonment and reduced lek attendance up to 3 miles away. 6.4 km -- (Steenhof et al. 1993, Connelly et al. 2004) -- Additionally, higher densities of power lines within 4 mi (6.4 km) of a lek may negatively influence lek persistence. Power lines may be locally significant causes of mortality due to collisions. Potentially more important, poles and towers associated with transmission lines have been shown to influence raptor and corvid distributions and hunting efficiency resulting in increased predation on sage-grouse. Recommendation: Based on this information, The Nature Conservancy recommends that compensatory mitigation be based on loss of habitat services within .6 kilometers either side of the centerline of the Gateway West Transmission Line</p>	

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			route. We note that the literature supports the conclusion that indirect impacts, such as predation, occur at much larger distances. Therefore, a 600 meter “band” on either side of the transmission line represents a moderate approach to quantifying habitat services losses that should be subject to compensatory mitigation based on available information for the habitat types affected. We calculate that this approach would include 19,084 acres in preliminary priority habitat and 39,599 acres in preliminary general habitat.	
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	<p>V. The Record of Decision Should Address Mitigation Planning and Oversight.</p> <p>Replacing sage grouse habitat that has been lost due to infrastructure project development is difficult yet essential. Success depends on investing compensatory mitigation funds at sites where sage grouse actually benefit from improved conditions, where vegetation status and trends are well enough understood to calculate mitigation project benefits or “uplift,” and where land management practices are consistent with maintaining the durability of mitigation benefits. The project proponents recognize these challenges in their compensatory mitigation proposal at Appendix C-3 and propose a collaborative “oversight committee” to help them select appropriate projects and locations. We think that this approach has merit and encourage BLM to include it in the Record of Decision (ROD). The ROD should elaborate on the committee’s composition and responsibilities and give it broad authority to align the implementation of compensatory mitigation measures with the BLM’s draft Manual provisions on mitigation and the Idaho Mitigation Framework. Specifically, we request that the oversight committee be given broad latitude to address:</p> <ol style="list-style-type: none"> 1. The selection of mitigation sites based on a landscape analysis that considers locations that provide greatest benefit to sage grouse populations, ensure compatible land management policies and practices, and maintain the persistence of mitigation benefits; 2. The mix of conservation projects included in the compensatory mitigation package; 3. Estimates of conservation project cost and mitigation benefit (uplift); and; 4. Stewardship and monitoring plans. <p>The oversight committee should have discretion to direct mitigation funds to off-site projects in accordance with the guidance discussed in the draft BLM Manual – 1794.</p>	Noted. See the ROD.
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY	<p>VI. Key Elements of the HEA Are Unsupported and Should Be Revised.</p> <p>As a general matter, the application of the HEA model used for the Gateway West Project is not fully supported in the administrative record. The BLM should re-open the HEA to address shortcomings</p>	The HEA is not unsupported as the comment asserts; it is a science-based, peer-reviewed method of scaling compensatory mitigation requirements to potential project-related effects, measured as a loss of habitat services compared to pre-disturbance conditions. HEAs have been used by multiple federal

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		OF IDAHO	<p>and should consider other analytical approaches for this and future projects.</p> <p>A. The HEA's Approach to Habitat Characterization Is Vulnerable to Inaccuracy and Undervalues High Quality Habitat. We believe that the HEA model is overly simplistic in ways that compromise its results. The HEA description states that "The Habitat Equivalency Analysis, described [below], provides a standardized basis to determine a one-to-one ratio for habitat services lost to habitat services mitigated."</p> <p>[Footnote 9] The key to the validity of the process is how "service" is defined. HEA relies on categorical measures ("bins") derived from expert opinion that are not weighted to reflect their relationship with sage grouse habitat utilization. This introduces unquantifiable inaccuracy into the HEA model. We recommend the use of data-driven, likelihood-based models that allow variables to be weighted based on observed habitat use similar to the U.S. Geological Survey's Wyoming Basins Ecological Assessment sage grouse model. Similar models should be developed in Idaho. In the HEA, scores of each category (i.e., 0,1,2,3) were assigned arbitrarily. In an analytical sense these are ordinal variables – and simply rank one class against the others. Yet, these scores are treated as meaningful in a mathematical sense. The model sums these ordinal variables to generate a single score. In a very real sense, the model adds 5 fairs, 2 excellents, and 4 goods, to come with a value of 19. In order for the model to be truly meaningful, the BLM must provide evidence that there is a mathematical relationship between these categories. For example, in the current model a site 51 meters from a county/state highway is twice as good as an identical one 50 meters away, but a site 1 km from the same highway is only 50% better than one 51 meters removed. This relationship holds true for all the variables; there is an exponential decline in value gained with improving quality (rate of improvement declines at a rate of $x-1$). As a result, the model dramatically undervalues quality habitat relative to poor or fair habitat. We believe that most scientists familiar with sage-grouse and sage-steppe systems would argue the exact opposite, that habitat value increases exponentially with improving quality, likely at a rate of $x10$. If the BLM wants to use this framework as a quantitative model for assessing habitat quality, it must provide the mathematical relationships between these categories, and relate them to the published literature. Seven of the eleven variables in the model cannot have a score <1. This further undervalues the best quality habitat by arbitrarily increasing scores for the poorest quality sites. The model completely ignores the regional and landscape context of the impacts. For example sage-grouse priority habitat areas should be highly valued and these values should be reflected in the site scores. Currently, this is not the case. By design, the model explicitly ignores any interaction among variables that might impact habitat quality. For example, a site that is</p>	<p>agencies to assess project related impacts and mitigation requirements for these projects in the U.S. within recent years. The HEA used for this project incorporated best available science, and was reviewed by an interagency committee of biologists that included biologists from the BLM, state wildlife agencies, and the USFWS.</p>

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			<p>close to a lek and is in a large patch of intact sagebrush is most likely far more valuable to sage grouse than one that has a similar patch size but is >8 km from an active lek (all other variable held constant). Yet, the model values the former as having only a 7.5% greater value to sage grouse. A cursory examination of the variables reveals many such interactions documented in the literature (e.g., sagebrush cover and bunchgrass cover). These clearly need to be reflected in the model. By ignoring these interactions, the current model is a significant step backward from the Habitat Suitability Index models developed for other prairie grouse species. Finally, by not incorporating interactions among variables, the current model further undervalues the highest quality sage grouse habitat. The importance of the “service” currency is accentuated when it is used to value mitigation lands. The model is explicit that “successful” mitigation occurs when the total service value impacted is replaced by mitigation. As a result, service value gained by mitigating poor quality habitat to moderate quality habitat is the same as that from moderate to high quality. Thus, for example, the loss of an acre of high quality habitat could be mitigated by seeding three acres of post-fire rehabilitation to bring those lands up to marginal quality. We disagree with the notion that this reflects effective, or appropriate, mitigation. TNC’s sage-steppe mitigation experience is that it is far easier to create low to moderate quality sage grouse habitat than to (re)create that of high quality. Thus, the current model’s structure would foster restoration of poor quality habitat as mitigation for the loss of that of highest quality. Rather, we suggest that the valuation model be used to identify quality classes (e.g. acres with a score >20 = quality class 1) and mitigation must replace all acres of quality class 1 with quality class 1 lands. This ensures that the total habitat quality is not ratcheted downward by constantly replacing high quality lands with those of lower quality. Finally, the HEA Technical Advisory Team identified five classes of projects suitable to mitigate the impacts of development: fence marking/modification, sagebrush restoration/reclamation, conifer/juniper removal, grass/forb enhancement, and conservation easements. Only two of these activities, sagebrush restoration/reclamation and grass/forb enhancement, are related to the 11 variables in the HEA model, and thus would have any measurable impact on the service value of the mitigated lands. And, as noted above, the known challenges of restoring high quality sage-steppe could, without careful planning and oversight, result in the restoration of poor quality habitat to moderate quality habitat as mitigation for the loss of the highest valued areas. B. The BLM Should Address Specific Shortcomings in the HEA. We have the following specific comments about the HEA: 1. The HEA’s treatment of the risk of mitigation project failure is arbitrary. The habitat conservation projects modeled in the HEA include actions that have a significant risk of project failure –</p>	

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			<p>particularly sagebrush steppe restoration and improvement projects and bunchgrass and forb seeding projects. The Conservancy strongly supports including these actions in the mitigation package. However, given the substantial risk of project failure, it is essential that the cost of these actions must be increased enough to offset the risk that vegetation treatments may not achieve the expected benefits. The HEA states that “conservative growth rates were sufficient to offset the potential for mitigation project failure.” [Footnote 10] This is an overly general approach to an issue that deserves a more precise treatment. A better approach would be to examine actual project histories and existing restoration project databases to determine the likely risk of project failure for the different types of conservation projects. The risk of project failure could then be reflected as a multiplier on the estimated cost of the action. The BLM’s recently issued Instruction Memorandum and Draft Manual Section—1794 suggests the use of ratios is an appropriate way to ensure that mitigation benefits will be proportional to impacts in light of uncertainty. [Footnote 11] 2. Fence marking should be removed from the list of eligible habitat projects. Two reasons support this request. First, fence marking does not replace habitat services lost due to direct or indirect habitat effects of the project. At most, fence marking offsets direct mortality due to power line strikes. Second, other funding sources and efforts are targeted on fence marking. These efforts should proceed and the Gateway West mitigation should be focused on projects that replace habitat services through protection, restoration, and enhancement. 3. The values for habitat services gained and cost per services gained are not adequately disclosed in the record. With the exception of fence marking, the mix of habitat conservation projects modeled in the HEA is appropriate. However, we are unable to understand how the specific habitat services gained values and costs per services gained, shown in Table 8 of Appendix J-2, were derived. Appendix D of Appendix J is difficult to understand. 4. Conservation projects will likely require a mix of measures that was not modeled. The HEA did not attempt to model a mix of different conservation actions, such as combining sagebrush restoration and conservation easements. However, vegetation treatments and other habitat enhancement projects on private lands will require some sort of long-term agreement to ensure that the mitigation site is not disturbed or developed. A conservation easement or other long-term management agreement is likely required as a component of such projects. This cost should be reflected in the estimates of cost per services gained.</p>	
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL	THE NATURE CONSERVANCY OF WYOMING, THE NATURE	VII. The FEIS Lacks the Findings Needed To Comply with Legal Standards for the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). The BLM preferred routes for Segments 8 and 9 would cross portions of the NCA, a unit of the National Landscape Conservation System.	The BLM Preferred Routes in Segment 8 and 9 generally avoid the SRBOP. The Preferred Route in Segment 8 crosses a 2-mile portion of the SRBOP within an approved utility corridor. The Preferred Route in Segment 9 crosses 8.8 miles of the SRBOP, 6.7

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	WHELAN	CONSERVANCY OF IDAHO	<p>In fact, the FEIS contains no alternative that entirely avoids the NCA. Therefore, BLM's decision to issue a right-of-way for the project must comply with the standards established in the 1993 statute establishing the NCA. In addition, the decision should also be consistent with the BLM Manual's standards implementing the National Landscape Conservation System Title of the Omnibus Public Lands Act of 2009. The FEIS lacks the findings needed to comply with these standards. As explained below, these standards require two findings: (1) the proposed project must not be incompatible with the values that NCA was established to protect and (2) the project must "protect, mitigate and enhance" the NCA. Compatibility Finding: The BLM Manual provides that the agency will not designate utility corridors within NLCS units if it determines the "corridor would be incompatible with the designating authority or the purposes for which the NLCS unit was designated." BLM Manual 1.6.J.5 (emphasis added). See also, 16 U.S.C. 460iii-3(b)(7) (allowing non-military uses within the NCA that are "compatible" with NCA purposes). The NCA purposes to be considered in making such a finding include: the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area. 16 U.S.C. §460iii-1(a)(2). The BLM Manual does not define the terms "compatible" or "incompatible." However, compatibility determinations are a familiar feature of administering the National Wildlife Refuge System and Wild and Scenic Rivers. In the context of Wildlife Refuges, an action is deemed "compatible" if it "will not materially interfere with or detract from the fulfillment of the mission of the System or the purposes of the refuge." 16 U.S.C. § 668ee(1). BLM's compatibility determinations for livestock grazing and recreational shooting at the Cascade-Siskiyou National Monument may also offer useful guidance on this point. Enhancement Finding: The NCA legislation requires that non-military uses must be consistent with "protection, maintenance, and enhancement" of raptors and other NCA purposes. See 16 U.S.C. 460iii-3(b)(7). The term "enhancement" requires more than simply minimizing or offsetting impacts. It calls for actions that leave the NCA better off than it would have been without the construction of transmission line. See also 16 U.S.C. 460iii-3(a)(2) (allowing activities in the NCA that "further the purposes for which the conservation area was established"). Prior to issuing the right-of-way for the project, BLM must analyze proposed enhancement measures and determine their effectiveness. We do not believe that these standards bar the project from NCA lands. However, no project right-of-way should be issued without findings in the administrative record that comply with these standards.</p>	<p>miles of which is in a designated corridor. The review by the NLCS found that the impacts on the SRBOP in these areas can be mitigated to meet the enhancement criteria of the enabling legislation. The BLM will continue to work with local government and stakeholders to seek a consensus resolution in this region.</p>
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY	<p>VIII. Enhancement Measures Offer an Important Opportunity to Improve the Condition of the NCA.</p> <p>The Birds of Prey National Conservation Area has been highly degraded by repeated fire and invasive plants. The area's native sagebrush/bunchgrass/forb assemblages have been lost across large portions</p>	<p>Thank you for your recommendations. These will be considered as the BLM continues to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.</p>

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		OF IDAHO	<p>of the NCA. The area is in urgent need of restoration and enhancement. A well-designed package of enhancement measures could provide significant benefits to the area.</p> <p>The enhancement package should focus primarily on the major threat to raptor populations within the NCA: the decline of the raptor's prey base due to the loss of shrub and perennial grass vegetative cover. Most of the NCA has burned in the last 25 years, and native shrub steppe vegetation has been replaced by annual grasslands dominated by cheatgrass and other non-native species. The change in vegetation has reduced the populations of small mammals that form the prey base for raptors. This decline has reduced the productivity of raptors within the NCA. In particular, efforts are needed to restore black-tailed jackrabbit and Paiute ground squirrel populations. Recommended measures include:</p> <ol style="list-style-type: none"> 1. Restore native shrubs and perennial grasses. Given the low precipitation levels within the NCA and the extent to which NCA lands have been invaded by annual grasslands, some non-native species that provide the structure needed by prey species may be used as necessary. The guiding principle should be to produce more resilient vegetation that provides better habitat for raptor prey species. 2. Work with ranchers or grazing permittees to improve riparian areas and springs. 3. Protect private inholdings through fee or conservation easement acquisition where lands have special features of high conservation value, such as canyon rims and adjacent areas that offer important nesting, perching, and foraging habitat. The goal for any acquisitions should not simply be NCA expansion. There is little value in BLM acquiring more annual grasslands or degraded range. Acquisition should be focused on specific natural, scenic or recreational features that add significant value to the NCA. <p>The existing NCA Resource Management Plan provides important guidance on the best places and techniques for this work.</p> <p>In addition, to these measures, we think there is a great opportunity to include measures to communicate with recreational users regarding seasonal or area closures or other best practices to reduce impacts and fire risks associated with off-highway vehicles, shooting, and other recreational activities. Interpretive signage, kiosks and other out-reach could help reverse the pace of fire and degradation in the NCA. As noted above, the goal for the enhancement package should go beyond one-to-one replacement of impacts. The BLM's recently issued draft Manual makes it clear that designations such as National Conservation Areas are appropriately considered in determining the value of the affected resource. [Footnote 12] We believe that a well-designed enhancement package could provide significant net benefits to the NCA.</p>	

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101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	IX. The Final Route for Segment 4 in Wyoming Should Avoid Pending Conservation Easements and Address a Local Proposal to Protect Important Wildlife Habitat. With respect to the proposed and alternative routes of the Gateway West transmission line in Lincoln County, Wyoming, identified on Figure A-5, Segment 4-WY in Appendix A of the FEIS, the Conservancy expresses the following concerns and recommendations: - The BLM Preferred Alternative and Proposed Route would diagonally bisect property that the Conservancy is in the process of establishing a conservation easement on, in cooperation with the property owners. This conservation easement will be purchased using both private and public dollars as well as a substantial donation from the landowners. As a result, we are concerned with the proposed construction of a transmission line that would impact the wildlife habitat, open spaces and agricultural operation that the landowners, the state of Wyoming, the federal government, private funders and the Conservancy feel warrant protection. We recommend a route that would avoid these impacts. - With respect to Feasible Alternative 4F, identified on Figure A-5, Segment 4-WY in Appendix A of the FEIS, we are concerned with the route's identified intersections with multiple properties that are in the process of establishing conservation easements. We recommend that alternative transmission line routes avoid impacting wildlife habitat, open spaces and culturally significant properties by avoiding properties with conservation easements in place or near completion. - The Conservancy is aware of the efforts of local stakeholders (landowners, community members and Lincoln County leaders) who have worked with representatives from Gateway West throughout the development of this project. From conversations with these stakeholders we understand they have recommended a route that would follow the existing transmission line corridor, and therefore minimize impacts on wildlife habitat and the community. Our understanding is that local stakeholders assumed the BLM Preferred Alternative route would be constructed slightly to the south of the existing line but still within the existing corridor, rather than to the north as in the current Preferred Alternative. From our understanding of these recommendations, we support this local stakeholder-recommended route that would follow an existing transmission line to the south and reduce impacts to properties that will be placed under conservation easement. Footnote	Following comments on the FEIS, the BLM met with local stakeholders and the Proponents to develop reroute options that avoid easements (see the ROD). The BLM will continue to work with local government and residents as requested to help resolve issues outside of federal lands.
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	Footnote 6: In fact, the draft EIS states that the project's direct and indirect impacts plus the absence of an agreed-upon compensatory mitigation plan is "likely to contribute to a trend toward federal listing or loss of viability for the greater sage-grouse." DEIS at 3-11-72 – 3-11-73 (emphasis added, referencing Region 4 language. It is hard to imagine how the minor amount of mitigation required via the HEA-based approach would serve as a sufficient basis for altering this finding.	The FEIS acknowledges adverse impacts to sage-grouse; however, it reaches a different conclusion than the DEIS in severity based on the Proponents' compensatory mitigation plan developed after the DEIS. Specifically, while the Project is likely to impact individuals or habitat, it is not likely to result in a loss of viability or cause a trend towards federal listing. However, the cumulative effects of the Project combined with other reasonably foreseeable projects could be substantial, and are addressed in Chapter 4 of the FEIS.

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101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	<p>Although these comments raise serious concerns about the adequacy of the compensatory mitigation proposed in the Gateway West Final Environmental Impact Statement (FEIS), we remain convinced that there is still time for the BLM, the project proponents, and key stakeholders to reach an appropriate balance between protecting the environment and building an electrical grid that meets the country's energy needs.</p> <p>SUMMARY OF COMMENTS</p> <p>1. BLM should take the time needed to fix major problems with its approach to compensatory mitigation for sage grouse impacts. page 2</p>	<p>Mitigation plans are included in Appendix C of the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The FEIS disclosed that, even with the proposed mitigation, there would still be adverse impacts. The extensive mitigation measures were developed through an inclusive process that drew on policy and scientific experts with significant input from stakeholders during the DEIS and FEIS processes, as well as the public comment period for the Addendum to the DEIS regarding effects on greater sage-grouse.</p>
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	<p>2. The FEIS fails to mitigate for significant impacts to sage grouse and their habitats. page 3</p> <p>3. The compensatory mitigation plan should include indirect impacts. page 6</p>	<p>Mitigation plans are included in Appendix C of the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The extensive mitigation measures were developed through an inclusive process that drew on policy and scientific experts with significant input from stakeholders during the DEIS and FEIS processes, as well as the public comment period for the Addendum to the DEIS regarding effects on greater sage-grouse. The FEIS disclosed that, even with the proposed mitigation, there would still be adverse impacts. One of the purposes of an EIS is to disclose the unavoidable adverse impacts of a project in order for the responsible officials to weigh the benefits against the impacts and make an informed decision.</p>
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	<p>4. Scientific research documents quantifiable indirect impacts and serves as a basis for incorporating these impacts into the compensatory mitigation plan. Page 8</p> <p>Recommendation: Compensatory mitigation of indirect impacts should be based on the loss of habitat services within .6 kilometers each side of the centerline of the Gateway West Transmission Line. We calculate that this measure would include 15,903 acres in preliminary priority habitat and 32,999 acres in general habitat. page 9</p>	<p>Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.</p>
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	<p>5. The record of decision should address mitigation planning and oversight. page 10</p>	<p>The ROD addresses mitigation planning and oversight.</p>
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	<p>6. Key elements of the Habitat Equivalency Analysis are unsupported and should be revised. page 10</p>	<p>The HEA is a science-based, peer-reviewed method of scaling compensatory mitigation requirements to potential Project-related effects, measured as a loss of habitat services from pre-disturbance conditions. It has been used by multiple federal agencies to assess project related impacts and mitigation requirements for other projects in the U.S. within recent years. The HEA used for this project incorporated best available science, and was reviewed by an interagency committee of biologists, which included the BLM, state wildlife agencies, as well as the USFWS.</p>

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101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	7. The FEIS lacks the findings needed to comply with legal standards for the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). page 14	The BLM is continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Project.
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	8. Enhancement measures offer an important opportunity to improve the condition of the NCA. page 15	We agree with this statement.
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	9. The final route for Segment 4 in Wyoming should avoid pending conservation easements and address a local proposal to protect important wildlife habitat. Page 16	Following comments on the FEIS, the BLM met with stakeholders and the Proponents to develop reroutes that avoid the easements (see the ROD).
101029	ANDREA ERICKSON QUIROZ, TONI HARDESTY, WILL WHELAN	THE NATURE CONSERVANCY OF WYOMING, THE NATURE CONSERVANCY OF IDAHO	Footnote 1: Draft MS-1974 – Regional Mitigation Manual Section (P), attached to Instruction Memorandum No. 2013-142 (6/14/13). Footnote 2: FEIS at Appendix J-1, page 3. Footnote 3: FEIS at 3.11-61 – 3.11-62. Footnote 4 FEIS at 3.11-135. Footnote 5 USGS, Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-Grouse (<i>Centrocercus urophasianus</i>) at 50. (Manier et al. 2013) Footnote 6: In fact, the draft EIS states that the project's direct and indirect impacts plus the absence of an agreed-upon compensatory mitigation plan is "likely to contribute to a trend toward federal listing or loss of viability for the greater sage-grouse." DEIS at 3-11-72 – 3-11-73 (emphasis added, referencing Region 4 language. It is hard to imagine how the minor amount of mitigation required via the HEA-based approach would serve as a sufficient basis for altering this finding. Footnote 7: FEIS at Appendix J-1, pg. 2. Footnote: 8 FEIS at 3.11-2 – 3.11-3 (emphasis added). Footnote 9: FEIS at Appendix J-1, pg. 2. Footnote 10: FESI at Appendix J-2, page 12. Footnote 11: Draft MS-1974 – Regional Mitigation Manual Section (P) at page 12 , attached to Instruction Memorandum No. 2013-142 (6/14/13). Footnote 12: Draft MS-1794 – Regional Mitigation Manual Section (P) Section 1.6.D.11.c.i. at page 1-10. Literature Cited Braun, C. E. 1998. Sage grouse declines in western North America: what are the problems? Proceedings of the Western Association of State Fish and Wildlife Agencies Pages 139-156. Connelly, J. W., S. T. Knick, M. A. Schroeder, and S. J. Stiver. 2004. Conservation assessment of greater sage-grouse and sagebrush habitats. Western Association of Fish and Wildlife Agencies, Cheyenne, WY. Connelly, J.W., Schroeder, M.A., Sands, A.R., and Braun, C.E., 2000b, Guidelines to manage sage grouse populations and their habitats: Wildlife Society Bulletin, v. 28, p. 967–985. Ellis, K.L., 1985, Effects of	This comments on the importance of mitigation are noted. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The extensive mitigation measures were developed through an inclusive process that drew on policy and scientific experts with significant input from stakeholders during the DEIS and FEIS processes, as well as the public comment period for the Addendum to the DEIS regarding effects on greater sage-grouse.

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			<p>a new transmission line on distribution and aerial predation of breeding male sage grouse: Final report, 28 p. Gillan, J. K., E. K. Strand, J. W. Karl, K. P. Reese, and T. Laninga. 2013. Using spatial statistics and point-pattern simulations to assess the spatial dependency between greater sage-grouse and anthropogenic features. Wildlife Society Bulletin 37:301-310. Hagen, C. A., B. E. Jamison, K. M. Giesen, and T. Z. Riley. 2004. Guidelines for managing lesser prairie-chicken populations and their habitat. Wildlife Society Bulletin 32(1):69-82. Hanser, S. E., C. L. Aldridge, M. Leu, M. M. Rowland, S. E. Nielsen, and S. T. Knick, editors. 2011. Chapter 5: Greater Sage-Grouse: General Use and Roost Site Occurrence with Pellet Counts as a Measure of Relative Abundance. Allen Press, Lawrence, KS. Johnson, D. H., M. J. Holloran, Connelly J. W., S. E. Hanser, C. L. Amundson, and S. T. Knick, editors. 2011. Influences of environmental and anthropogenic features on Greater sage-grouse populations, 1997-2007. University of California Press, Berkeley, CA. Knick, S. T., S. E. Hanser, and K. L. Preston. 2013. Modeling ecological minimum requirements for distribution of greater sage-grouse leks: implications for population connectivity across their western range, U.S.A. Ecology and Evolution. LeBeau, C. W. 2012. Evaluation of Greater Sage-Grouse reproductive habitat and response to wind energy development in south-central Wyoming, M.S. thesis. Masters. University of Wyoming, Laramie, Wyoming. Leu, M., S. E. Hanser, C. L. Aldridge, S. E. Nielsen, B. S. Cade, and S. T. Knick, editors. 2011. Chapter 4: Sampling and Analytical Approach to Develop Spatial Distribution Models for Sagebrush-Associated Species. Allen Press, Lawrence, KS. Manes, R., S. Harmon, B. Obermeyer, and R. Applegate. 2002. Wind energy & wildlife: an attempt at pragmatism. Wildlife Management Institute, Washington D.C. Manier, D.J., Wood, D.J.A., Bowen, Z.H., Donovan, R.M., Holloran, M.J., Juliusson, L.M., Mayne, K.S., Oyler-McCance, S.J., Quamen, F.R., Saher, D.J., and Titolo, A.J., 2013, Summary of science, activities, programs, and policies that influence the rangewide conservation of Greater Sage-Grouse (<i>Centrocercus urophasianus</i>): U.S. Geological Survey Open-File Report 2013–1098, 170 p., http://pubs.usgs.gov/of/2013/1098/. Pitman, J. C., C. A. Hagen, R. J. Robel, T. M. Loughin, and R. D. Applegate. 2005. Location and success of lesser prairie-chicken nests in relation to vegetation and human disturbance. Journal of Wildlife Management 69:1259-1269. Pruett, C. L., M. A. Patten, and Wolfe. D. H. 2009. Avoidance Behavior by Prairie Grouse: Implications for Development of Wind Energy. Conservation Biology 35:1253-1259. Robel, R. J., J. A. Harrington, C. A. Hagen, J. C. Pitman, and R. R. Recker. 2004. Effect of energy development and human activity on the use of sand sagebrush habitat by Lesser Prairie-Chickens in southwestern Kansas. Pages 251-266 in Transactions of the North American Natural Resources Conference. Rodgers, R. 2003.</p>	

Letter #	Owner	Organization	Comment	Response
			Wind Power Generation: Biological Concerns. Wind Energy Symposium April 10, 2003. Ft. Hays State University, Hays, Kansas. Schroeder, M. A. 2010. Greater sage-grouse and power lines: reasons for concern. Report, Washington Department of Fish and Wildlife, Olympia, Washington. Steenhof, K., M. N. Kochert, and J. A. Roppe. 1993. Nesting by Raptors and Common Ravens on Electrical Transmission Line Towers. The Journal of Wildlife Management 57:271-281. U.S. Fish and Wildlife Service, 2010, Endangered and threatened wildlife and plants, 12-month findings for petitions to list the Greater Sage-Grouse (<i>Centrocercus urophasianus</i>) as threatened or endangered: Washington, D.C., FWS-R6-ES-2010-0018, Federal Register, v. 75, no. 55 (March 23, 2010), 107 p. U.S. Fish and Wildlife Service. 2013. Greater Sage-grouse (<i>Centrocercus urophasianus</i>) Conservation Objectives: Final Report. U.S. Fish and Wildlife Service, Denver, CO. February 2013 Walker, B. L., D. E. Naugle, and K. E. Doherty. 2007. Greater sage-grouse population response to energy development and habitat loss. Journal of Wildlife Management 71:2644-2654. Wisdom, M., C. Meinke, S. T. Knick, and M. A. Schroeder. 2011. Factors associated with extirpation of Sage-Grouse. Pages 451-472 in S. Knick and Connelly JW, editors. Greater Sage-Grouse: ecology and conservation of a landscape species and its habitats. University of California Press, Berkeley, California. [See PDF for Article attached: Using Spatial Statistics and Point-Pattern Simulations to Assess the Spatial Dependency Between Greater Sage-Grouse and Anthropogenic Features]	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 8. EIS Page 1-22. The WECC also notes that utilities are expected to use their history of experience and prudent judgment to ensure reliability, and not rely upon strict rules. Even Idaho Power on this page notes that common corridor outage must consider undue impact to the environment and surrounding areas. This is further evidence that the BLM needs to, independently, analyze the Proponent's claim of a need for separation.	The issue of separation distances between transmission lines is discussed in detail in Chapter 1 of the FEIS. The Proponents' proposed project, which includes the separation criteria, was approved by both the FERC and the WECC (see Section 1.3.2 of the FEIS). The Gateway West Project included the minimum separation distances used in this analysis with some deviation where needed. The BLM relies on federal agencies with expertise on power transmission lines to make determinations on issues such as separation. As a point of interest, a fire took out all three Bridger lines in Segment 4 and recently a similar event occurred on the Proponents' lines in Utah. See Section 1.3.5 of the FEIS.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 9. EIS Page I-23. The Proponents note that they received approval for the project based upon the old 1,500 foot separation criteria, and apparently they do not want to go back and reroute under the new separation criteria. The EIS also notes that the Wyoming Infrastructure Authority commissioned a study which concluded that minimum separation distance should be 260 feet. Fire, high winds, tornadoes and lightening are to be considered. Tornadoes are not a threat in Idaho and the possibility of fire creating smoke and shorting out adjacent lines can not be shown to be a problem. In any case the	The issue of separation distances between transmission lines is discussed in detail in Chapter 1 of the FEIS. The Proponents' proposed project, which includes the separation criteria, was approved by both the FERC and the WECC (see Section 1.3.2 of the FEIS). The Gateway West Project included the minimum separation distances used in this analysis with some deviation where needed. The BLM relies on federal agencies with expertise on power transmission lines to make determinations on issues such as separation. See Section 1.3.5 of the FEIS for examples of multiple line outages.

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			BLM adopts the old, outdated and illogical 1,500 foot criteria the Proponents urged without substantial analysis. Power County and Cassia County request the BLM fulfill its requirement and independently and officially analyze the WECC separation criteria in light of revisions and updates as noted above.	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 13. EIS Page 2-66. This page discusses alternative 5C, which is the only route allowed by Power County through Ordinance. Alternative 5C would have the least impact in every aspect the BLM is supposed to analyze including generalgentile terrain, less visual impact and less environmental impact. The BLM apparently did not endorse this alternative because the Fort Hall Shoshone-Bannock Tribal Business Council voted to not allow the project through the Reservation. If governmental is approval is required prior to an analysis being conducted, the BLM preferred alternative for Segment 5 and the BLM preferred alternative for Segment 7 has route have been rejected by Power County and Cassia County, which the BLM acknowledges has siting authority through the county on non-federal land. Therefore the BLM cannot select a preferred alternative other than the ones approved by the Counties, who are the legal siting authority. The BLM cannot have it both ways, , refuse to endorse an alternative because one governmental agency has rejected it and yet adopt an alternative that another governmental agency has rejected	The BLM lacks the authority to grant a ROW on tribal lands or any lands other than those prescribed by law. As described in Chapter 2 of the FEIS, federal law (25 U.S.C. §324) provides: “No grant of a right-of-way over and across any lands belonging to a tribe organized under the Act of June 18, 1934 (48 Stat. 984) [25 USCS § § 461 et seq.], as amended; the Act of May 1, 1936 (49 Stat. 1350); or the Act of June 26, 1936 (49 Stat. 1967) [25 USCS § § 501 et seq.], shall be made without the consent of the proper tribal officials.” The Fort Hall Reservation was organized under the Indian Reorganization Act of June 18, 1934. Following the Fort Hall Business Council’s decision not to permit the Project to be built across the Reservation, the BLM reviewed the remaining route choices analyzed in the Draft EIS, all of which potentially impacted BLM-managed lands, and selected the Proposed Route across federal land incorporating Alternatives 5B and 5E as its Preferred Route for Segment 5. The Preferred Route minimizes impacts to public land resources in the Deep Creek Mountains. We disagree that this is a double standard; the BLM is upholding all applicable laws and policies. Unlike the county government, the Shoshone-Bannock Tribes are a sovereign nation with treaty rights that must be considered.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 14. EIS Page 2-68 Mention is made that I-84 creates an East-West corridor and was considered. That is not the case. The only consideration was a very short stretch off-I-84. I-84 would be a very natural corridor for the transmission system, and would be particularly appropriate for underground lines. Given the fact that the purpose for this line is not to serve Idaho Power customers, but to simply serve as a highway for the transmission grid, this matter should be remanded for new planning and an analysis conducted which would allow underground line following I-84 across Southern Idaho.	Please refer to Section 2.6.3 for an analysis of underground alternatives. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 15. EIS Page 2-129 Power and Cassia County, among others, requested that the BLM independently analyze buried transmission lines as an underground alternative. The BLM surreptitiously ignored that request and just allowed the Proponents to prepare a response, which BLM adopted. It is clear that the Proponents are opposed to burying the lines because they have never buried lines and they are more familiar with overhead lines. Furthermore the Proponents firmly believe that overhead lines are cheaper and the Proponents are not particularly concerned about the impact of overhead lines to either private or public land. As the Counties noted in	Please refer to Section 2.6.3 for an analysis of underground alternatives. This analysis meets the requirement of BLM Instruction Memorandum (IM) 2012-043 to "Identify technically feasible best management practices, conditions, etc. (e.g., siting, burying powerlines) that may be implemented in order to eliminate or minimize impacts." The primary emphasis of BLM IM 2012-043 is the: 1) protection of unfragmented habitats, 2) minimization of habitat loss and fragmentation, and 3) management of habitats to maintain, enhance, or restore conditions that meet sage-grouse life history needs. Specifically,

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			<p>detail, buried line technology is rapidly evolving and becoming a very common form of power transmission. Rather than analyze this evolving technology, the BLM has allowed it to be ignored. As the BLM noted, burying transmission lines would eliminate many of the visual impacts and would reduce the susceptibility of the system to weather and fire hazards. It also clearly would eliminate any concern about sage grouse habitat, which concern is apparently two-fold; that ravens will roost on the lines and prey on sage grouse, and that the sage grouse will run into the structures. Instead of analyzing the possibility of burying the lines, the BLM just deferred to the Proponents' position. This is completely contrary to the requirements of the BLM's own Greater Sage-Grouse Interim Management Policies and Procedures Instruction Memorandum (IM), Page 3, which require the BLM to consider burying power lines in sage grouse habitat. It is clear that burying the line in sage grouse habitat would eliminate the sage grouse objection to the County's preferred route 7K. As the BLM is required by those policies and procedures to analyze buried lines in sage grouse habitat, the failure of the BLM to do that in this case, renders the EIS fatally flawed. See BLM Instruction Memorandum number 2012-043. The Proponents similarly dismissed HVDC underground lines, without the analysis required for an Environmental Impact Statement. The BLM cannot simply allow the Proponents to refuse to analyze viable alternatives, it is the job of the BLM to independently analyze those possibilities.</p>	<p>BLM IM 2012-043 describes interim conservation policies and procedures that are to be used by BLM within greater sage-grouse PPH and PGH during this interim period, to conserve sage-grouse. PPHs are defined as areas that have the highest conservation value to maintaining sustainable sage-grouse populations. These areas would include breeding, late brood-rearing, and winter concentration areas. PGHs are areas of occupied seasonal or year-round habitat outside of Priority Habitat. Both PPH and PGH were delineated cooperatively between federal and state management agencies. BLM IM 2012-043 states that: "The BLM field offices do not need to apply the conservation policies and procedures described in this IM in areas in which (1) a state and/or local regulatory mechanism has been developed for the conservation of the Greater Sage-Grouse in coordination and concurrence with the FWS (including the Wyoming Governor's Executive Order 2011-5, Greater Sage-Grouse Core Area Protection); and (2) the state sage-grouse plan has subsequently been adopted by the BLM through the issuance of a state-level BLM IM." Wyoming has established a state regulatory mechanism for the conservation of sage-grouse (see the "State Regulations and Policies" section below), and the BLM has adopted this state strategy through the issuance of BLM IM Wyoming-2012-019; therefore, PPH and PGH will not be designated in Wyoming, and the Wyoming Core Areas have been adopted by the BLM for federal planning purposes. PPH and PGH were designated in Idaho on April 2012.</p>
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	<p>COMMENT 16. EIS Page 2-189</p> <p>The Table 2.8-4 is length and landownership comparisons for the BLM preferred route, the Proponents' preferred route and the other alternatives. Power County and Cassia Counties' preferred alternative for Segment 5 shows some interesting figures. Segments 5C and 5E total 31.3 miles. The Proponents' proposal touted 55.7 miles. The BLM preferred segment is 73.3 miles. Thus the BLM's preferred route is approximately 18 miles longer than the proposed segment and 42 miles longer than Power County's preferred segment. The BLM's preferred segment is 80% on private land. Even the Idaho Power proposal is not as bad; 69% on private land. The BLM modifications to the preferred route were solely for BLM preferences on public land. However, the fact that the BLM's chosen route impacts greatly more private land, working agricultural land, seems to be no consideration for the BLM. The BLM is only interested in the public land without considering that where the route leaves public land, by necessity, it goes onto private land.</p>	<p>The BLM's Preferred Route incorporates Alternative 5E. The reasons Alternative 5C could not be selected are discussed in Section 2.4.1.1 of the FEIS. The comment is correct that the BLM's Preferred Route is longer than the preferred alternative of Power and Cassia counties. The commenter's interpretation of Table 2.8-4 is not entirely correct, however. To calculate the full length of Power and Cassia counties' preferred alternative, which incorporates Alternatives 5C and 5E, the difference between the alternative lengths and the comparison portion of the Proposed Route (i.e. 32.9 miles - 26 miles = 6.9 miles for 5C, and 5.8 minus 5.3 = 0.5 miles for 5E) must be subtracted from the total length of the Proposed Route for Segment 5: 55.7 minus 7.4 = 48.3 miles. The BLM's Preferred Route is thus 25 miles longer than Power County's preferred alternative. The Preferred Route minimizes impacts to public land resources in the Deep Creek Mountains and requires the least amount of road construction because of the use of existing roads. The final alignment across private land will be determined by the local government, private landowners, and the Proponents, following state law and local procedures. Potential impacts to private lands and agriculture are analyzed in Sections 3.4, 3.17, and 3.18 of the FEIS.</p>

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101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 17. EIS Page 2-193 Again the BLM preferred segment is 12 miles longer than the Proponent's segment. Power and Cassia Counties' preferred Alternative 7K is 30 miles longer than the Proponent's segment and 18 miles longer than the BLM preferred segment. Again the BLM preferred route is 80% on private land which is again greater than the Proponents' proposal which is at 72% private land. The counties' preferred alternative is 37% on private land which is the same proportion of private to public land as the entire State of Idaho. The BLM and the Proponents have largely touted the fact that the overall route will be approximately 50% on private land and 50% on public land. However, the BLM is intentionally targeting Power and Cassia Counties by requiring them to carry the brunt of the private land burden in some of the most valuable, productive and important agricultural land in the entire state. This could be devastating to the private economies of Power and Cassia County.	The BLM has worked cooperatively with Power and Cassia counties throughout the EIS process and has sought to address concerns regarding impacts. The Preferred Route in Segment 7 was selected to avoid sage-grouse Preliminary Priority Habitat and impacts to other significant public land resources that the BLM is required to protect. The final transmission line route across private land will be determined by the local government (Power and Cassia counties), private landowners, and the Proponents, following state law and local procedures. The BLM does not have the authority to permit a ROW across lands outside of its jurisdiction. The FEIS discloses potential adverse effects to individual agricultural operators, including an additional independent economic analysis in Appendix K, and states that the Proponents would negotiate damage-related issues, such as reductions in the acreage available for cultivation, with affected farmers during the easement acquisition process (p. 3.18-17).
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 18. EIS Page 3.2-53- Figure 3.2-3 This map shows alternative 7K to be 2 miles away from the outer boundary of the City of Rocks National Reserve. This is important, because on several occasions throughout the EIS, 7K is rejected by the BLM because it might be visible from the City of Rocks. This again, is an inconsistent application of visual resources	The BLM was unable to select Alternative 7K for multiple reasons, including but not limited to the proximity to City of Rocks National Reserve, which is a sensitive visual, cultural, and recreational resource. The major reason for not selecting 7K is the adverse effect on sage-grouse Preliminary Priority Habitat as well as impacts to other significant public land resources that the BLM is required to protect. Please refer to Section 2.4.1.1 for a discussion of BLM's Preferred Alternatives and Section 3.2 and Appendix E for the detailed visual analysis.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 19. EIS Page 3.2-147 This page contains the conclusions concerning the BLM' s preferred route. They note that the visual impacts of the preferred route would be moderate to high impact to residences in the Rockland and Arbon Valley. The BLM proudly notes that the preferred route is 12 miles longer than the proposed route, but will cross mostly private land and less Idaho State land in the proposed route. It also notes that the preferred route will be located closer to more residential viewers than the proposed route. What all this means is that residents viewing the transmission towers on the preferred route are not given the same consideration as being able to see the towers from public land. What this attitude ignores is the fact that transmission lines on private land are just as visible from adjacent public lands as they are from adjacent private land. Public land and private land do not exist apart from the other in Southern Idaho. They are adjacent and interwoven. They do not exist independently of each other	The BLM has conducted a thorough visual effects analysis across all land ownerships and disclosed impacts in Section 3.2, Appendix E, and Appendix G. This analysis is one of many analyses that the BLM had to consider and weigh when selecting its preferred alternatives. We appreciate the interwoven nature of public and private lands in Idaho. The BLM does not have the authority to permit a ROW across private lands or to require mitigation on private lands. The final siting of the Project on private lands would be determined through the state and county permitting processes.

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101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 20. EIS Page 3.2-148 Notes that our alternative 7K, due to its increased length as well as its proximity to the City of Rocks will have higher visual impacts than the other routes. The BLM ignores the fact that placing the project 80% on private lands will have much higher visual impact to the people who lives on those private lands and who have to see and try to live around the project on a daily basis	The high visual impacts to residences of the Preferred Route in Segment 7 are noted on page 3.2-147 and discussed in the full analysis in Section 3.2, and Appendix E.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 21. EIS Page 3.4-42 Schneider's economic analysis of the impact upon agriculture begins at this page and runs through 3.4-48. The conclusion of the BLM is that the economic impacts upon private industry would be something for negotiation with the Proponents during the easement acquisition process. This ignores the reality of eminent domain law in Idaho.	The analysis by Schneider Consulting Services for agricultural impacts requested by Cassia and Power counties is presented in full as Appendix K to the FEIS. Individual losses are considered damage-related issues and compensation would be negotiated between the landowner and the Proponents during the easement acquisition process. This process is governed by state and county laws and policies. As noted in Chapter 1 of the FEIS, if a fee ownership or an easement cannot be negotiated with the landowner, the Proponents may acquire the rights needed under eminent domain laws prevailing in Idaho. Statutes have been enacted that define this process on private and non-federal public lands for utilities.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 22. EIS Page 3.1 1-12 On this comment the BLM notes that the Governor of Idaho issued an Executive Order to establish an Idaho sage grouse task force. The Governor's alternative Sage Grouse Task Force management plan was completed in September 2012, and is an alternative possibly to be adopted by the BLM's sage grouse planning strategy. The BLM notes that routes involving Segments 1, 2, 3 and 4, are consistent with the Wyoming Governor's Executive Order. No such comparable concurrence was given to the Idaho segments. In fact the BLM's discussion of sage grouse impact is inconsistent with Idaho's sage grouse task force maps and recommendations. The BLM EIS notes that the BLM's national policy will not be made final for some years. That is no reason to not have the BLM routes in compliance with the Idaho Governor's Executive Order, which this EIS is they are not. As, in fact, construction of the segments, at the earliest, will not be until 2018, there is no reason to ignore the Idaho habitat maps, which the BLM alternatives do. Alternative 7K would not be inconsistent with the Idaho Governor's Executive Order, contrary to the BLM's findings.	The Idaho Governor's Task Force recommendations are addressed in FEIS section 3.11.1.3. The Governor's Alternative was finalized, as stated in the comment, in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis. Wyoming Governor's Executive Order 2011-5 set specific, mapped core habitat areas in their state and the Wyoming management plan has been accepted by the federal agencies. This is not yet the case for Idaho. The FEIS must be consistent with the existing regulations and direction at the time it is completed.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY	COMMENT 23. EIS Page 3.5 The BLM is required to analyze potential impacts from a Preferred Route under the Environmental Justice Requirement 3.5. On 3.5-6, it is noted that both Power County and Cassia County's percent of population below the official poverty level is higher than the national average. On Page 3.5-10 it is understood that	The FEIS concludes that effects to agricultural operations are not expected to noticeably affect overall agricultural production and employment in the affected counties (FEIS p. 3.5-10). It also acknowledges that effects to individual landowners may be more substantial (Section 3.18); however, the issue of agricultural

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		GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	the impact of the Preferred Route will impact agricultural operations which will have a disproportionate effect on minority and low income farm workers. The EIS then defers to Section 3.18 as the analysis of the economic impact upon agriculture. The BLM should specifically analyze the negative impact this line will have upon the agricultural economies of the land impacted, and its related impact upon the farm workers who work that land. It is simple common sense that if you hurt the agricultural economies of Power and Cassia Counties, and reduce the number of farms, that will have a disproportionate impact upon the minority and low income farm workers. Placing the line 80% upon private, agricultural land in these counties by definition will harm that private land, make agricultural activities less. economical and take land out of production	production losses are damage-related issues that will be negotiated with the Proponents for appropriate compensation during the easement acquisition process. Even within individual agricultural lands, impacts are not expected to take a substantial amount of land out of production with appropriate tower siting in final design (Appendix K).
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 24. EIS Page 3.18.2.1 On Page 3.18-12 the "No Action" alternative is discussed. Apparently in that analysis the only reason for not adopting the "No Action" alternative is that the demand for electricity is projected to continue to grow in the Proponent's service territories. Similarly the BLM reports that there will be increased transmission demand. As previously discussed and thoroughly analyzed in the Section discussing the Idaho Power Integrated Resource Plan, these BLM assumptions are faulty. See Comment on ES-18 & 29 above. Given the fact that there is no foreseeable increased demand for electricity that makes this project necessary, and given the detrimental impact to existing economies and business, the "No Action" alternative should be adopted by the BLM.	Your preference for the No Action alternative is noted. As stated in Section 1.2 of the FEIS, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM relies on DOE and FERC to evaluate the Proponents' objectives.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 25. EIS Page 3.18-21 On that Page the BLM noted that the Power County Gateway Citizens' Task Force presented concern about agricultural guidance systems receiving interference from the proposed transmission line. In fact, the Power County Task Force gave specific examples to this occurring under current, smaller transmission lines. The BLM relied upon studies from the years 2000 and 2001 to dispute the experience of the Power County Task Force. The Power County and Cassia County Task Forces do not believe that 12 and 11 year old studies reflect the modern realities of automated irrigation and equipment guidance systems. The BLM should require the Proponents to conduct a modern analysis with up to date information. The Power County and Cassia County Task Forces did not make up their concerns, they have experienced them personally. For the BLM to dismiss those based upon old studies is inappropriate. GPS technology has evolved greatly since 2001.	The FEIS analysis in Section 3.18 is based on the most recent studies available at the time of FEIS preparation. Please share any more recent studies that you have with the BLM.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY	COMMENT 26. EIS 2.8.5, Page 2-191. In the BLM announcement to release the final Environmental Impact Statement, April 2013, BLM described key routing issues considered in developing the BLM's preferred alternatives. The description for the BLM preferred alternative for Segment 7 twice mentioned avoiding "preliminary	The Idaho Governor's Task Force recommendations are addressed in FEIS section 3.11.1.3. The Governor's Alternative was finalized, as stated in the comment, in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's

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		GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	<p>priority sage-grouse habitat." In fact it appears the major rationale for rejection of Power and Cassia County's preferred alternative for Segment 7 was additional length and crossing BLM identified preliminary priority sage-grouse habitat. Power and Cassia County dispute this conclusion. Pursuant to Idaho Executive Order 2012-02, Idaho Governor Butch Otter established an Idaho Sage Grouse Task Force. That task force issued recommendations which were accepted by the Governor. The Gateway West EIS issued a Sage Grouse Addendum in June 2012, which stated "the [Idaho] task force's recommendations would be incorporated into the final EIS if approved by the Governor prior to the publication of the EIS." Sage Grouse Addendum, Page 7. The Governor's Task Force issued its recommendations June 15, 2012. Those recommendations were incorporated into the FEDERAL ALTERANTIVE OF GOVERNOR C.L. BUTCH OTTER FOR GREATER SAGE-GROUSE MANAGEMENT IN IDAHO, SEPTEMBER 5, 2012. Despite the promise of the BLM in the Sage Grouse Addendum, the BLM, in the Gateway EIS, has completely ignored and contradicted the Idaho Sage Grouse management plan. A review of the Idaho Task Force Sage-Grouse maps show that Power and Cassia Counties' proposed alternative route 7K would not cross any "Core" habitat (CHZ) but would cross some "Important" habitat (IHZ). The Idaho habitat maps show that Core habitat contains approximately 75% of male sage grouse while Important habitat contains approximately 20% of male sage grouse. "General" habitat contains very few sage grouse. This is important, as under Governor Otter's task force report, "management within the IHZ [Important] permits a greater degree of flexibility to develop new infrastructure projects than does the CHZ [Core] [sic IHZ]." Page 10 Specifically the Governor's Task Force report allows for limited infrastructure development in IHZ, under several circumstances, which include micro-siting, demonstration of a high value benefit to the State of Idaho, appropriate mitigation and other analyses. See Task Force Report, Page 14-15. See also Governor Otter's Federal Alternative, September 5, 2012. In this case the BLM has chosen to totally ignore the Idaho Governor's Executive Order, contrary to the promise made by the BLM in the Sage Grouse Addendum. Alternative 7K was rejected, out of hand, by the BLM because of BLM interim guidelines concerning sage grouse. No consideration was given to the Idaho Sage-Grouse Task Force findings or the Idaho sage-grouse habitat map, which differs greatly from that of the BLM. Governor Otter's Federal Alternative incorporates the Task Forces' habitat designation and habitat maps. The BLM's unilateral dismissal of Alternative 7K for sage grouse reasons is contrary to Idaho law, the Idaho Governor's Executive Order, and county law. Power County and Cassia County request the BLM properly analyze Alternative 7K in compliance with</p>	<p>RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis. Alternative 7K would affect significant amounts of Preliminary Priority Habitat (PPH) for sage-grouse that was delineated cooperatively between federal and state management agencies. Alternative 7K would impact 1,386 acres of PPH compared to 149 for the preferred route. The BLM could not select a route with that level of impact to PPH.</p>

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			<p>the Idaho Governor's executive Order and Sage-Grouse Task Force Recommendations. The counties submit that such an analysis will eliminate the BLM's sage grouse objection to 7K. The BLM's preferred alternative route for Segment 9, in fact, crosses what has been identified by Governor Otter's Task Force as Important habitat. Segment 9 also crosses substantial General habitat. Power and Cassia Counties' proposed Segment 7, similarly crosses a small amount of Important habitat and some General habitat. However, under the Governor's Task Force Report, some intrusions into Important habitat is allowed for infrastructure such as transmission towers, under certain circumstances. The BLM has taken advantage of that ability in Segment 9, but has denied Power and Cassia Counties' requests to put Segment 7 on similar standing. According to Table 8-7, the BLM preferred Segment 9 is 171.4 miles long, of which 153.5 miles are BLM land. Only 13.4 miles of that preferred segment is private land. One of the BLM's objections to Power and Cassia Counties proposed Segment 7 was that it placed the line 63% on public land. BLM's preferred Alternative 9 is 90% on BLM land alone. That objection for Power County and Cassia County are not consistent with the BLM's attitude in other parts of the EIS. Owyhee County is seriously important sage grouse habitat. The BLM has allowed the line to cross public lands in important sage grouse habitat in its preferred alternative for Segment 9, but has not treated Power County and Cassia Counties' proposed Segment 7 with the same standard. The Bureau of Land Management is currently preparing a Sage Grouse strategy for Idaho and Southwest Montana. The Unedited Internal Administrative Draft has been circulated among Cooperating Agencies. The BLM would be well served to delay making preferred alternatives for Segments 5 and 7 until that project is completed, perhaps sometime in 2014. Time is not of the essence in the Gateway West project and the UIADEIS contains far different analysis concerning sage grouse than the Interim guidelines the BLM has used for Gateway. The BLM has chosen preferred alternatives for Segments 5 and 7 which force the transmission line 80% onto private property. The main reason for this is sage grouse. However, the more modern thinking is that, though a variety of measures, transmission line impacts to sage grouse can be minimized. It was previously noted that the BLM's own Interim guidelines suggested burying transmission lines in sage grouse habitat. That requirement is being carried forward in the Sage Grouse Task Force Draft. In addition, research suggests that anti perch devices can be placed upon transmission towers to reduce or eliminate predator perches. The possibility of raven predation, and ravens perching on transmission towers was cited as part of the reason the BLM rejected suggested alternatives which would transverse sage grouse habitat. Specific sage grouse management Guidelines submitted by the Idaho Department of Fish & Game, the Washington</p>	

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			<p>Department of Fish & Wildlife, the Bureau of Land Management, and the Colorado Division of Wildlife, published in the Wildlife Society Bulletin, suggested both non perching design features on lines as well as burying power lines in sage grouse habitat is a viable solution to those problems. Connelly, et al., 2000 Wildlife Society Bulletin 28(4): 967-985. The Connelly study also noted that relatively high raven populations may decrease sage grouse nests success, but rigorous field studies using radio telemetry do not support this hypothesis. It seems that the BLM in addressing proposed alternative 7K, has attempted to take the easy way out, and push the line onto public land so that they do not have to study the true impact of transmission lines on public land. They have taken assumptions and accepted them as accurate without proper analysis. The BLM has overemphasized possible negative impacts such as predation without proper analysis, and as an excuse to claim they are helpless to comply with Power County and Cassia County law. Presuming, without proper analysis that transmission lines have a negative impact upon sage grouse is not proper, given the fact that this Environmental Impact Statement has been pending for many years. Power and Cassia County have frequently requested the BLM conduct a proper analysis and not just blindly accept these presumptions, which resulted in the BLM's decision. The most important and definitive analysis of the relationship between sage grouse and high voltage transmission lines has been pursued by eminent sage grouse experts from the University of Nevada-Reno. Dynamics of Greater Sage-Grouse Populations in Response to Transmission Lines in Central Nevada, Dan Nonne, Eric Blomberg, James Sedinger, Department of Natural Resources and Environmental Sciences, University of Nevada-Reno, February 2013. (Nonne) In Fall 2003 Sierra Pacific Power Company (now N.E. Energy) began construction of a 345 kilovolt transmission line between Falcon and Gondor, Nevada. Construction was completed in the Spring of 2004 and the line was energized in May. The line is 290 kilometers long and has 735 towers. The line runs through the middle of Eureka County's prime sage grouse habitat. Although this is a preliminary analysis, it is based upon ten years of actual surveying, study and analysis on the Falcon to Gondor transmission line in Nevada. That preliminary analysis, based upon this thorough study, shows that there is no negative effect on sage grouse that could be explained by proximity to a transmission line. This is a very important finding, not only because of the nature of the study, but it's determination that the location of a transmission line in primary sage grouse habitat is irrelevant to male survival, male movement, female survival, pre-fledgling chick survival, and nest survival. A copy of the published manuscript is attached to this comment. In February of 2013 Nonne published a progress report on year 10 of the monitoring and analysis of sage grouse demographics in Eureka County, Nevada. The</p>	

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			Nonne analysis is very thorough. They banded 1,381 sage grouse during the 9 years and have radio collared 288 sage grouse, in addition to the bands. They monitored 427 nests and captured and marked 349 chicks and recaptured 92 of the marked chicks at one month of age. In all situations and occasions, proximity to the Falcon to Gondor transmission line was irrelevant to any impact on sage grouse. The Nonne analysis understood the thesis that utility lines can provide perches for avian predators. Nonne's analysis found that prior studies on the impact of utility lines in sage grouse leks did not answer many questions or account for confounding factors. This is an important study, which is not yet complete, but should be considered the most important study for purposes of Gateway West. The BLM should not allow potentially false or disproved theories to create the impact that is known will occur if the line runs through agricultural land, rather than public land.	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 27. EIS Page 3.18-24 This section of the EIS discusses the problems with crop dusting and transmission lines. The section notes that the Power County Task Force provided substantial evidence concerning problems created by transmission lines. The report notes, on 3.18-25, that Idaho Power has several hundred miles of high voltage transmission lines in Power and Cassia County. Members of the Power County Task Force provided direct testimony that they had witnessed fatal aviation accidents on their property due to crop dusters coming into contact with transmission lines. Amazingly, on 3.18-24 the EIS indicates that crop dusting pilots could fly under the lines. Did the BLM receive testimony or information from crop dusting pilots that they would be willing to aerially apply agricultural chemicals by flying under 500,000 volt electric lines? All of the information provided to the BLM is contrary to this statement. This type of minimizing the impact of the project on agricultural is not supported by any indication that pilots would apply chemicals by flying under the lines. The Environmental Impact analysis itself shows that aerial application is not possible near power lines. Appendix K, Page 10 shows that Schneider Consulting Services took a survey that indicated a buffer zone would be necessary of up to 100 feet on each side of a power line. Thus, 100 feet on each side of a power line would be a "no fly" zone and thus, aerial application would not be possible. The Schneider analysis in Appendix K, also discusses ground application and the damage that causes. However, there are times of the year when ground application is simply impossible, the field is too wet or grown. In such a case, fungicide applications would not be possible and an entire crop could be lost. As Schneider notes, many times there can be a late occurring plant disease, such as late blight, stripe rust or insects which can be very destructive. Schneider noted that "Ground spraying would be considered in lieu of aerial spraying, but may not be possible on short notice due to the field	The citation is provided in Appendix K: "A survey of five aerial applicators indicated that a buffer zone of up to 100 feet on each side of a power line is adequate for pilot safety (Parker 2011; Hubler 2011; Driscoll 2011; Shamblin 2011; Bybee 2011)." The FEIS does not dispute that there have been fatal accidents associated with crop spraying (as there have been with other aspects of farming). The FEIS simply reports the information on aerial application it derived based on a survey of professional aerial applicators operating in the area.

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			being too wet, particularly under wheel line systems." Thus, the EIS statement that aerial applicators could fly under the power lines is rejected by the actual survey of aerial applicators as referenced in Appendix K. This is just another verification of the reasons not to force the line onto private agricultural land.	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 28. EIS Section 2.9.1, Page 2-206 The EIS makes the comment that "Gateway West, by itself would have minor adverse impacts to private land uses or to agriculture with the degree of impact varying by alternative." Unfortunately the BLM has chosen the most impactful alternative, which unnecessarily and substantially increases the adverse effects to private land uses and agriculture. The BLM preferred alternative for Gateway West, for Segments 5 and 7, crosses 160.9 miles of private land. Power County has identified at least 175 separate parcels and 81 land owners impacted, crossed by the proposed route in Power County alone. The farmers impacted, as shown by the Schneider study (EIS 153 .4-42), do not believe these impacts to be minor. On the same page, the BLM concludes that Gateway West, by itself, would have "significant adverse effects on some cultural resources." Saying that Gateway West would have minor adverse effects to private land uses, but then increasing the impact to significant adverse effects on cultural resources is inappropriate and does not give the proper weight to realistic review of the impacts. The BLM preferred alternative for segments 5 and 7 are 80% on private land. The agricultural economic impact analysis conducted by Schneider Consulting Services, Appendix K to the EIS contradicts the above BLM conclusion. In summary, Schneider stated "Construction of power lines in agricultural areas causes a tremendous amount of disruption to producers on whose property the lines are constructed." Appendix K, Page 13. Overall, the EIS downplays the cumulative impact on private property and agricultural uses while at the same time significantly overstating the cumulative effect on something like "cultural resources." The BLM does recognize, on Page 2-206 that there are "other past, present and foreseeable future projects including additional transmission lines which make the cumulative effects also significant." The BLM notes that there are several "proposed transmission lines" in the area. The BLM lists MSTI, and several other proposed routes, but does not list all of the routes that have been suggested or proposed. The Chinook transmission line proposal would largely follow Gateway West through Power and Cassia Counties. The Northern Lights project would have a substantial impact upon Power County agriculture. Compounding the Gateway West project by locating another one or two transmission lines along the same route, but 1,500 feet apart, could very well render that agricultural land of no use. Federal government programs such as the CRP program could be eliminated by the presence of numerous transmission lines. Power and Cassia Counties submit that the BLM has	The FEIS discloses adverse impacts to agricultural lands in Section 3.18 and, as noted in the comment, in Appendix K. The cumulative effects analysis in Chapter 4 of the FEIS also concludes that when taken together with future projects and other factors that constrain and limit agriculture, the additional withdrawal of land for utility uses can be very important to individual farmers and agricultural communities. The reasons for the BLM's Preferred Routes in Segments 5 and 7 are detailed in Section 2.4.1.1 of the FEIS.

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			not sufficiently studied the cumulative impact upon private land uses and agriculture. Again the Schneider Analysis recognizes this fact. "The addition of another power line to the existing matrix would compound the problems landowners already face. This would particularly be true with aerial spraying, which would be very significant in some cases." Appendix K at Page 13.	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	<p>COMMENT 1. Page ES-13 The Power County and Cassia County preferred route, Alternative 5E is criticized in the EIS as it would not meet the WECC separation criteria (1500 feet) from existing lines that the Proponent established as part of the project's Purpose and Need. The EIS does note that it would have fewer visual effects, would avoid potential disturbance to nesting raptors, and would affect less agricultural ground. It would also cross within 1,000 feet of 8 fewer residences.</p> <p>Power and Cassia Counties do not agree that any separation criteria have been established. The EIS itself notes WECC has recently lowered its separation criteria to 250 feet. The Wyoming Governor's Conference called for a 260 foot separation. Idaho Power is holding on to the old separation criteria because that is what was in effect at the time they planned the project. Power and Cassia Counties reject the assertion that the Proponent established anything as part of the project's Purpose and Need. That was not any sort of proceeding which invited or received any commentary or scrutiny. Power County and Cassia County do not agree that its purpose and need have been established through this process. WECC itself says that the separation criteria have to be flexible and analyzed in terms of common sense experience and consideration of the situation involved. As an example, one of the most widely mentioned reasons for separation criteria is wildfires.</p> <p>Alternative 5E largely crosses green fields, irrigated agricultural land and the Snake River. Wildfires are not an issue in that area and, in anyone's memory there has never been a wildfire in that area. Similarly, WECC concerns about vandalism or airplanes dragging lines are not a conceivable problem in this area. Applying a strict rule without ample analysis of the specifics involved is nonsensical. This is particularly true when the citing authority has adopted 5E as the only allowable route. Power County and Cassia County request that the BLM fully endorse Alternative 5E and eliminate any negative comments about WECC separation criteria.</p>	The BLM's Preferred Route for Segment 5 incorporates Alternative 5E on the condition that WECC reliability issues can be resolved. Nearly all of this route is on private land, the Proponents and the County will need to resolve the issue.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L.,	<p>COMMENT 2. ES-15</p> <p>On that page there is a discussion of why Alternative 7K, endorsed by Power County and Cassia County, was not a preferred route. The discussion does note that Alternative 7K would cross less private land. There was a concern on crossing sage grouse habitat, which can be resolved. It was noted that the 7K was not supported by the</p>	Alternative 7K would affect significant amounts of Preliminary Priority Habitat (PPH) for sage-grouse that was delineated cooperatively between federal and state management agencies. Alternative 7K would impact 1,386 acres of PPH compared to 149 for the preferred route. The BLM could not select a route with that level of impact to PPH.

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		INC	<p>Proponents due to higher costs, presumably because of length. It was also noted that it may impact visitors to the City of Rocks. Alternative 7K was specially prepared to avoid the City of Rocks, and in fact is approximately 2 miles from the closest exterior boundary of the City of Rocks. The BLM's own VRM guidelines do not consider passing within 2 miles to be a problem. This is particularly true when the BLM VRM guidelines would allow visual impacts on private land much closer than 2 miles. It is noted that 7K would cross less farmland and pass within 1,000' feet of fewer residences.</p> <p>As to higher costs, the BLM's preferred alternative is substantially longer than the Proponents' proposal, 12 miles. It does not seem to have bothered the BLM to increase the length of Segment 7 to avoid public land at a greater cost to the private land. The BLM did not comment that its lengthening Segment 7 by 12 miles would increase construction costs substantially. That seemed acceptable to serve BLM purposes of avoiding public land. However it is inconsistent to dismiss the local government and landowners' preferred route because it will involve higher costs for construction.</p> <p>The same is true for the BLM's preferred alternative for Segment 5; it is much longer than either the Proponent's route or the County's preferred route.</p> <p>The Governor's Task Force on sage grouse would allow infrastructure in the sage grouse habitat crossed by 7K, under many circumstances. Mitigation would and should be required of the Proponents for any interference in sage grouse habitat in this area, however, it is allowed under the Governor's designations. There is no Core or Prime Habitat impacted by 7K.</p>	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	<p>COMMENT 3. ES-18 & 2929</p> <p>Under the "No Action" alternative the BLM concludes that the demand for electricity and especially renewable energy would continue to grow in the Proponents' service territories. It also notes that the demand for transmission services identified by the Proponents would not be met, without the construction of Gateway West through Idaho. Neither of these arguments are true for Idaho Power or the segments within the State of Idaho. The Idaho Power 2011 Integrated Resource Plan (IRP) does not forecast any increased demand for electricity or renewable energy, that cannot be met through existing resources. Similarly there is not identified demand for transmission services that would justify the Idaho segments. See also comment 4. The IRP projects that with the completion of the Boardman to Hemmingway line, Idaho Power will be able to meet its anticipated load for the next ten (10) years. For the ten years after that, 2021-2030, only one of the ten planning scenarios uses Gateway West as a potential source of additional power. The other nine have other sources. It is also noteworthy that green power such as</p>	Your preference for the No Action alternative is noted. The No Action alternative is analyzed in the FEIS. As stated in Section 1.2 of the FEIS, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM relies on DOE and FERC to evaluate the Proponents' objectives.

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			<p>solar and wind is currently not competitive in a cost analysis. Combining this with the current concerns about upgrading and remodeling the Jim Bridger plant, which would require a substantial expenditure to meet current Clean Air Act requirements, should further indicate that Gateway West is not needed for Idaho Power.</p> <p>The Jim Bridger Plant is currently in the middle of an adverse and contentious argument in the Wyoming Public Services Commission. Jim Bridger is aging rapidly, and the owners of the plant have proposed a remodeling and a rebuilding. The Wyoming Public Services Commission has heard testimony from many rate payers groups that the cost of renewing Jim Bridger, with the cost of replacing the old coal-fired power plant technology with new and cleaner technology to meet Clean Air Act standards would make the power non-competitive with power rates. Many have testified that this could impact the need for the Gateway West project if the Jim Bridger coal plant is not renewed. It is not expected that this process in the Wyoming Public Services commission will be complete. This uncertainty further lessens the explained need for Gateway West.</p> <p>The "no action" alternative needs to be seriously analyzed. Developments since the beginning of this process have shown that the "no action" alternative is probably the best option.</p> <p>In explaining the "No Action" alternative, the BLM indicates that not building Gateway West could potentially have detrimental socio-economic impacts, with negative impacts to existing businesses and economic activities. Certainly that is very true if Gateway West is built, as it will have negative socio-economic impacts and negative impacts to existing businesses and economic activities in these counties and as explained in the economic analysis at 3.4-42.</p>	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	<p>COMMENT 4. EIS Page 1.1 The BLM concludes that Gateway West is principally necessary to serve the Proponents' customers. That is not true for Idaho Power, and the IRP analysis proves that. As noted on Page 1-14, Idaho Power customer needs are largely met in the foreseeable 10 year period with the Boardman to Hemmingway project. Further on Page 1-15 the EIS notes that even in a longer out period, 2021- 2030, most of the scenarios in the selected scenario portfolios in the IRP do not project a need for Gateway West Transmission capacity. In fact, the Idaho Power County IRP specifically states, for the planning period of 2021 - 2030 "Although the resources in the preferred portfolio for the second 10-year period were analyzed without the addition of the Gateway West Transmission project, Idaho Power plans to continue permitting the Gateway West project because of uncertainty associated with the location of resources planned so far in the future and the long lead time required to permit high voltage transmission projects." IRP at P. 123. Thus, as Idaho Power is specifically saying, they do not plan on needing any power from</p>	<p>As stated in Section 1.2 of the FEIS, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM relies on DOE and FERC to evaluate the Proponents' objectives.</p>

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			Gateway West until possibly after the year 2030. For that reason it makes no sense to ignore such issues as the quickly developing buried line technology or even to press forward with Gateway West before the BLM's own sage grouse plan is finalized. However, the BLM defaults to Idaho Power's beliefs that it is prudent to continue to pursue the Gateway West project in case there is a future need. This is pure speculation, which is shown to be very costly to rate payers and damaging to the economies of Power and Cassia Counties.	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 5. EIS Page 1-16 The EIS notes that Idaho Power is taking a lesser role in this project and there is no defined role for Idaho Power in Gateway West, as of December 2012. Again, to pursue this project at expense to rate payers and effected land owners, with such an uncertain future and speculation is not consistent with the BLM requirements or the requirements of an Environmental Impact Statement. The "no action" alternative would make much more sense at this point.	Your preference for the No Action alternative is noted. As stated in Section 1.2 of the FEIS, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM relies on DOE and FERC to evaluate the Proponents' objectives. Page 1-16 in the FEIS notes that Rocky Mountain Power has taken the lead in permitting; this does not mean that Idaho Power does not have a role. As stated on the previous page, Idaho Power believes it is prudent to continue to pursue additional transmission capacity across southern Idaho through Gateway West.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	EIS Page 1-18 Under Purpose and Need, the Idaho Power plans on filing for cost recovery of the building costs of building Gateway through a PUC rate case, which means that Idaho Power customers will be paying their share of this 2 billion dollar project, without any benefit to Idaho Power customers.	The Proponents may file for cost recovery; however, whether it is granted is up to state regulators. The state reviews the prudence of project alternative selection, cost control, customer benefits, and usefulness of the facilities resulting from the investment in the project. A rate change would only be approved if state regulators agree there is a benefit to customers in the state.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 7. EIS Page 1-21 This section involves WECC Separation Criteria. Again, the BLM falls back to an old, discredited example or common mode failures, including "a snagged shield wire from one line being dragged into the adjacent line, an aircraft flying into more than 1 one line and smoke from a fire."Id. We have previously commented that WECC itself has criticized these common mode failures, noting that they should not be the basis for a separation criteria. The WECC separation criteria drafting team specifically, in revising the criteria, noted that the possibility of an airplane dragging the conductor from one circuit to another circuit on a separate tower "is an extremely low probability event and practically impossible. Designing a system for this very low	The issue of separation distances between transmission lines is discussed in detail in Chapter 1 of the FEIS. Both FERC and WECC have approved the Gateway Project, the separation criteria are part of the proposed project. The BLM has concluded that the minimum separation distances proposed by the Proponents are reasonable and consistent with regional conditions. During final design, the Proponents will evaluate where this distance can be decreased to avoid impacts to sensitive resources on a site-specific basis.

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			<p>probability event by treating the two circuits as if they are on the same tower is not appropriate." FEIS Appendix L-1.</p> <p>For some reason the BLM indicates it has nothing to do with WECC separation criteria and accepts the Proponent's version without investigation. It is not proper for the BLM to defer to the Proponent's own, flawed interpretation which is totally inconsistent with the actual criteria.</p> <p>The BLM in the EIS notes that the 1,500 foot separation criteria has been substantially revised, and in fact, has gone down to 250 feet. Despite this fact, the BLM has chosen not to re-analyze many of the Proponent's arguments for the wide spread separation that were based upon the old criteria. The BLM essentially states that it is too late to go back and revisit that. It is obvious that having this broad separation criteria impacts substantially more private land and essentially condemns it without justification or reason. Given the fact that construction of any Idaho segments of Gateway West are at least 5 years away, and probably substantially longer, it is not good planning to look backwards and use old, outdated analyses. This section and statement needs to be revised, to reflect modern analysis, and some common sense.</p>	
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	<p>COMMENT 10. EIS Page 1-24 The purpose of the Gateway West Project is then shifted to a different form, and not so much as meeting Idaho Power's service needs but to be part of the transmission grid. This change substantially modifies the "Purpose and Need" of the project and severely impacts the decision of the BLM to shift the line onto private land. If the BLM wants the line, because the federal government wants to upgrade the transmission grid, then public land should carry the substantial burden of that line. The federal government needs to work in conjunction with its various entities to resolve issues such as Visual Resource Management and sage grouse habitat and place the line primarily on federal land. With pressure from Washington D.C., this project has been put on a fast track, and the BLM has taken the unfair position that they will govern the location of the line on private property. The fact that Idaho is 63% federal land, and yet Segments 7 and 5 are 80% on private land is completely inconsistent with the new purpose for the Gateway West Project.</p>	<p>The purpose and need for the Project is explained in detail in Chapter 1, and includes meeting Idaho Power's service needs. Based on 2012 figures, which the most recent available, 52 percent of the electricity consumed in Idaho in 2010 was imported from other states (http://www.eia.gov/state/?sid=id). The citizens of Idaho, as well as in most other states, rely on the national grid to provide electricity. It is generally agreed that the grid needs to be upgraded to provide for a growing population and increased use of electronic devices.</p>
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	<p>COMMENT 11. EIS Page 2-45</p> <p>The BLM alternative for Segment 5 is 18 miles longer than the proposed route and crosses 19 more miles of private land. The BLM chose that route, placing the route 80% on private land to avoid impacts to public land values. This is contrary to County law, and specifically contrary to Power County and Cassia County Ordinances concerning transmission line corridors. It makes no sense to intentionally avoid the Counties' well- conceived and negotiated</p>	<p>Please refer to Section 2.4.1.1 for the reasons the BLM selected its preferred alternative in Segment 5. The effect on property owners is discussed in Section 3.4 of the FEIS. Approximately half the Project is on public lands: 47 percent BLM, 7 percent State, 44 percent private, 1 percent National Forest System (NFS) land, and 1 percent Other. Within the Pocatello Field Office, the general land base includes 12 percent BLM, 21 percent NFS, 10 percent Indian Reservation, 6 percent State, 2 percent Water, and 48 percent private. The BLM could not select the County's preferred</p>

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			preferred routes, say "this is the little bit of public land that can be crossed by the transmission lines and it is now up to the Counties to connect those public corridors."	route because the BLM lacks the authority to grant a ROW on tribal lands or any lands other than those prescribed by law. As described in Chapter 2 of the FEIS, federal law (25 U.S.C. §324) provides: "No grant of a right-of-way over and across any lands belonging to a tribe organized under the Act of June 18, 1934 (48 Stat. 984) [25 USCS § § 461 et seq.], as amended; the Act of May 1, 1936 (49 Stat. 1350); or the Act of June 26, 1936 (49 Stat. 1967) [25 USCS § § 501 et seq.], shall be made without the consent of the proper tribal officials." The Fort Hall Reservation was organized under the Indian Reorganization Act of June 18, 1934. Following the Fort Hall Business Council's decision not to permit the Project to be built across the Reservation, the BLM reviewed the remaining route choices analyzed in the Draft EIS and selected the Proposed Route across federal land incorporating Alternatives 5B and 5E as its Preferred Route for Segment 5. The exact alignment across private land will be determined by the local government, private landowners, and the Proponents, following state law and local procedures.
101030	DOUGLAS BALFOUR, JULIE YEATES	MOVEIT, LLC, CASSIA COUNTY GATEWAY WEST TASK FORCE, POWER COUNTY GATEWAY WEST CITIZENS TASK FORCE, G.O.A.L., INC	COMMENT 12. EIS Page 2-47 The BLM notes that the County's alternative Segment 7K is 35miles longer than the BLM's preferred route and therefore the BLM would not select it. The BLM's preferred route is 12 miles longer than the Proponents preferred route for Segment 7 and 18 miles longer than the Proponents' route for Segment 5. This is an inconsistent application of this objection	Many factors were considered in selecting BLM's preferred alternatives. Length was often but not always a main indicator of significance of impacts depending on the distribution and concentration of sensitive resources. Not only is Alternative 7K longer, it impacts 1,386 acres of PPH compared to 149 for the preferred route. The BLM could not select a route with that level of impact to PPH.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG reiterates a concern noted in our comments about the AFEIS regarding Segment 9E, the BLM preferred alternative for Owyhee County. We pointed out that Alternative 9E has greater adverse impacts on special status wildlife than Alternative 9D, particularly for sage-grouse. Alternative 9E traverses BLM's Preliminary General Habitat (PPH), and skirts habitat classified as BLM Preliminary Priority Habitat (PPH) and State of Idaho Important Habitat (Governor Otter's Alternative). Additionally, several active sage-grouse leks are located within two miles of the proposed route. Alternative 9D traverses the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). Raptors and corvids have been shown to utilize transmission lines and associated lattice towers for nesting, roosting, and perching (Engel et al. 1992, Steenhof et al. 1993). For Alternative 9E, this could lead to increased raptor and corvid predation on sage-grouse and sage-grouse eggs. A new transmission line in the NCA (Alternative 9D) is not expected to adversely affect sage-grouse and may provide additional nesting, roosting, and perching substrates for raptors, the focal species for which the NCA was created so the benefits of the preferred Alternative 9E over 9D are unclear and should be stated more clearly to	Alternative 9E generally avoids Preliminary Priority Habitat (PPH) for sage-grouse but does cross general habitat. The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with Idaho State and local government, as well as other stakeholders, to seek a consensus route in Segment 9 as part of a phased decision approach.

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			<p>clarify the BLM decision framework.</p> <p>We note that south of Twin Falls at the base of the South Hills, the proposed line barely skirts Core Habitat west of the proposed Cedar Hill substation and bisects Important Habitat east of the substation (see attached map). We are unaware that any active/occupied leks occur in close proximity to the proposed route. An existing 345 kV transmission line does run roughly parallel to the proposed GWW line west of the proposed substation.</p> <p>We raise this points with the specific request that the FEIS reflect siting and mitigation guidelines found in the Federal Alternative of Governor C.L. "Butch" Otter for Greater Sage-Grouse Management in Idaho, September 5, 2012 (Governor Otter's Alternative).</p>	
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	<p>Specific Comments Related to Impacts on State Endowment Land</p> <p>Idaho Department of Lands, at the direction of the Idaho State Board of Land Commissioners, manages Endowment Trust Lands with the State. [Footnote 23] In December 2007, the Land Board adopted the State Trusts Lands Asset Management Plan addressing the overall management of Endowment Lands within Idaho.</p> <p>State Trust Lands are not managed for the public at large and should not be referred to as "public lands" or "open space," either specifically or in a generic sense. These are working lands producing revenue for the Beneficiary Institutions.</p> <p>Any routes that cross state endowment land must be located to minimize impact to the remainder of the parcel. A 20-year term easement would be the authorizing instrument issued to allow the project on trust land. Application for use can be obtained from any IDL office.</p>	Idaho State Endowment Lands are addressed in Section 3.17.1.3 of the FEIS, and are described as working lands intended to provide long-term financial returns for schools and other institutions. The word "lease" has been changed to "easement" in the errata sheet to more accurately describe the legal instrument that would have to be negotiated with IDL for crossing endowment lands. The exact siting of the transmission line on these lands would be determined during the easement acquisition process. Idaho endowment lands are included in calculations of state land for land ownership analysis, and in this sense may be part of what is referred to as public lands to generally distinguish between state-owned land and privately owned lands. The BLM has no authority to require the Proponents to either cross or avoid State trust lands; however, the BLM expects the Proponents to work with the State on siting the transmission line through or near state trust lands.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	<p>According to the FEIS, the application of Environmental Protection Measures (EPMs) on State and private lands in Idaho is voluntary (see Table 2.7-1). Recognizing that the BLM lacks authority to impose mitigation measures for these lands, we note that there may be considerable effects of the transmission line to species like sharp-tailed grouse (over half of the occupied habitat in south-central Idaho occurs on private property) and wintering big game (especially mule deer). We strongly encourage the proponent to work with private landowners and the State of Idaho to implement applicable EPMs on private and State lands to mitigate for potential project-related effects. Implementation of EMPs can help ensure state wildlife management objectives are upheld. IDFG notes that no compensatory mitigation is identified for any species other than sage-grouse. We recognize there will be some overlap between the application of mitigation for sage-grouse and other species that rely on sagebrush habitats, however, there are areas of non- or low quality sage-grouse habitat where mitigation of effects for other state-important species (e.g., wintering big game) are not addressed but could</p>	The BLM supports the recommendation that the Proponents work with IDFG and the Natural Resources Conservation Service to further assess if routes intersect any of the SAFE acreage.

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			<p>be meaningful. We have repeatedly commented about this issue and have advised broader application of mitigation measures than just sage-grouse relative to the state's wildlife.</p> <p>More specifically, we raise the possibility that some of the routes proposed in southeast Idaho (generally from the state line to Borah Substation) may intersect with private lands that have been enhanced for sharptail grouse using a portion of the Conservation Reserve Program called "State Acres for Wildlife Enhancement," (SAFE) in Power, Cassia, Bannock, Oneida, and Caribou counties. A map illustrating icons located on the centroids of each SAFE contract is attached. We request that BLM and the Proponents work with IDFG and the Natural Resources Conservation Service to further assess if routes do intersect any of the SAFE acreage. Because financial resources have been used to enhance these private lands for wildlife, primarily sharptail grouse, we request additional mitigation or compensation discussion if SAFE acres are affected.</p>	
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	<p>it is unrealistic to claim that the decision on where and how the lines will be built on private property is not dictated by BLM. [Footnote 1] The reality is that when BLM grants right-of-ways on public land, its decisions dictate the location of the transmission lines on private property. This is particularly challenging when BLM refuses to cooperate in siting energy infrastructure on federally managed land when it is available and in close proximity, as is the case with BLM's Preferred Alternative in several different areas.</p>	<p>The BLM recognizes that its choice of preferred alternatives does also impact where the transmission line may cross private and state lands. We have stated that we do not have the authority, however, to permit the transmission line across private and state lands and that precise routing would still need to be determined through local processes. Over half of the project would be located on federal lands, and most of that on BLM-managed lands. We have worked cooperatively with the state and local governments for several years to analyze a range of alternatives. The BLM's Preferred Alternatives represent difficult choices and compromises among many different resources we are charged to manage and protect. We will continue to work with state and local government as requested during final siting deliberations off of BLM-managed land.</p>
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	<p>BLM should abandon its Preferred Alternative for Segments 8 and 9 because of impacts on future development and sage-grouse. The National Environmental Policy Act (NEPA) requires that "... statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses." [Footnote 2] Using this standard, BLM did not do sufficient analysis on the impacts for Preferred Alternatives 8B and 9E. This analysis should include the economic impact that BLM's Preferred Alternative has on the future development of private property, specifically within the City of Kuna's Area of Impact and the City of Melba. NEPA requires that an EIS "shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned)." [Footnote 3] BLM's analysis for its Preferred Alternative on Route 8 (Route 8B) fails to address the issues of future development for both the City of Kuna</p>	<p>The BLM is continuing to work with landowners, local officials, and other federal agencies to determine an acceptable route in Segments 8 and 9. We are following a phased decision approach, and at this time, no decision has been made for this portion of the Project.</p>

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			and the City of Melba. If Route 88 is selected, Kuna estimates that it will lose \$76,310,584 in tax revenue from future development because of interference caused by BLM's Preferred Alternative. [Footnote 4] Additionally, the two-mile study corridor for Segment 8B bisects Melba's current city limits, and is directly in the path of Melba's natural growth. [Footnote 5] The FEIS fails to address either Kuna or Melba's concerns about future development, and fails to acknowledge either cities' Comprehensive Plan or Area of Impact. The FEIS also ignores the financial damages associated with the social and economic impacts that the proposed corridor will cause if Route 8B is selected. This includes developers, and landowners that relied on Kuna's Comprehensive Plan to guide decisions to develop land that will be significantly devalued because of Route 8B. Millions of dollars stands to be lost by private property owners in the Kuna and Melba areas if BLM chooses to move forward with its Preferred Alternative.	
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	BLM's Preferred Alternative for Route 9 encroaches on sage-grouse habitat as identified both in Governor Otter's proposed sage-grouse management plan [Footnote 6], as well as the one issued by BLM in the National Greater Sage-Grouse Management Planning Strategy. [Footnote 7] In the FEIS, BLM admits that its Preferred Alternative would result in an increased impact for sage-grouse when compared to Alternatives that were not selected, including Route 9D, the consensus route for this segment which does not contain any sage-grouse habitat. [Footnote 8] Importantly, BLM avoided certain routes of the Project because sage-grouse habitat was affected, and for Segment 9E BLM contradicts that reasoning, choosing instead to interfere with sage-grouse habitat. The solution to the issues discussed above is for BLM to abandon its Preferred Alternative in favor of the consensus routes that travel through the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP-NCA). The State's position on BLM's reasoning to avoid the SRBOP-NCA in the FEIS is discussed in detail below.	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with Idaho State and local government, as well as other stakeholders, to seek a consensus route in Segment 9 as part of a phased decision approach.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	NEPA also encourages collaboration, and public involvement in decisions which affect the quality of the human environment. [Footnote 13] Additionally, BLM touts that collaboration is the touchstone of managing public lands. BLM defines collaboration as "a cooperative process in which interested parties, often with widely varied interests, work together to seek solutions with broad support for Federal, State and county managed public lands." [Footnote 14] The authority for use of this collaboration comes from Executive Order 13352, "Facilitation of Cooperative Conservation" (August 26, 2004), which "... directs agencies to implement environmental and natural resource laws to promote collaborative activity among Federal, State, local, and Tribal governments, private for-profit and nonprofit institutions, other non-governmental entities and individuals." [Footnote 15] Prior to releasing	The BLM coordinated closely with local governments throughout the project. However, the BLM concluded that the ground disturbance and new access roads associated with the routes through the NCA would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with Idaho State and local government, as well as other stakeholders, to seek a consensus route in Segment 9 as part of a phased decision approach.

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			its Preferred Alternative, BLM encouraged interested stakeholders to work together to find the "correct" route for the transmission line in Segments 8 and 9, following its own practice of collaboration. Accordingly, Idaho state agencies, conservation groups, local elected officials, community leaders, interested citizens, state and local BLM offices, and other federal agencies successfully participated in a three year collaborative process that determined consensus routes that traveled through the SRBOP-NCA. Ultimately, the Washington D.C. BLM office acted in contravention to its own goals and directions on collaboration when it ignored these routes in favor of its Preferred Alternative. The mistrust created by promising collaboration, and working at state and local levels towards a solution that was universally accepted only to have the Washington D.C. office unilaterally reject the solution is substantial. Only time will tell how much the agency's relationship with the State, and its citizens has been damaged.	
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	BLM should reconsider its Preferred Alternative on Segments 8 and 9, and BLM's avoidance of the Morley Nelson Snake River Birds of Prey National Conservation Area. NEPA requires that environmental information is "high quality." The Purpose of NEPA is to ensure that agencies use "accurate scientific analysis, expert agency comments, and public scrutiny" when analyzing environmental effects. [Footnote 9] BLM has completed scientific studies in the past on the relationship of raptors with transmission lines, including monitoring raptor responses to transmission lines in the SRBOP-NCA from 1981 through 1989. Reports from those studies found that 500-kV transmission lines enhanced opportunities for raptors to perch, nest and roost. Raptors and ravens are attracted to 500-kV lines, and the productivity of hawks and eagles nesting on transmission towers was found to be equal to, or better than those nesting in the canyon. [Footnote 10] These BLM studies are high-quality, peer reviewed, and provide accurate scientific analysis. In the FEIS, BLM justifies its decision to avoid the SRBOP-NCA by asserting that the proposed mitigation does not currently meet the enhancement requirements in the enabling legislation. BLM claims that a transmission line through the SRBOP-NCA would have residual impacts after mitigation, especially raptor populations and habitats due to collision, fragmentation and because currently offered mitigation does not offset the impacts of the disturbance and fragmentation of raptor prey base habitat. [Footnote 11] However, BLM does not provide any justification for these conclusions, and it is clear that BLM did not use high quality scientific analysis, including its own studies, in its decision to avoid the SRBOP-NCA. Moreover, BLM misuses the term "mitigation" in regard to impacts on the SRBOP-NCA in the FEIS. BLM defines mitigation as "... Rectifying an impact by repairing, rehabilitating, or restoring the affected environment; [and] Reducing or eliminating an impact over time by preservation and maintenance	The EIS does not contest that towers provide enhanced opportunities for raptors to perch, nest and roost. This is not the issue. The NLCS staff reviewed the Agency's proposed Preferred Alternative and concluded that the ground disturbance and new access roads associated with Proposed 8 and Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with Idaho State and local government, as well as other stakeholders, to seek a consensus route in Segments 8 and 9 as part of a phased decision approach.

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			operations during the life of the action... " [Footnote 12] By context taken from this definition, the term mitigation assumes a negative impact. However, it is clear from BLM's own scientific studies that a transmission line does not have negative impacts to raptor populations as discussed above.	
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	BLM's Record of Decision should include the habitat designations found in the Federal Alternative of Governor C.L. "Butch" Otter for Greater Sage-Grouse Management in Idaho Governor C.L. "Butch" Otter submitted an alternative to BLM for inclusion in the National Greater Sage-Grouse Management Planning Strategy (Governor's Alternative). The Governor's Alternative was developed utilizing a diverse group of stakeholders, including representatives from agricultural, energy or mineral development, local sage-grouse working groups, environmental organizations, wildlife or sportsmen's groups, State elected officials, county elected officials, and representatives of the public at large. The sage-grouse task force was assisted by state and federal agencies, including the Idaho Department of Fish and Game, Idaho Office of Species Conservation, Idaho Department of Lands, Idaho Office of Energy Resources, Idaho State Department of Agriculture, Idaho Department of Parks and Recreation, United States Fish and Wildlife Service, Bureau of Land Management, and the National Resources Conservation Service. The sage-grouse task force was formed in response to an invitation from the Secretary of Interior. [Footnote 16] As you know, the Governor's Alternative is a more accurate description of potential sage-grouse habitat than the alternative offered by BLM and incorporated into the FEIS. [Footnote 17] The National Environmental Policy Act (NEPA) requires that BLM use "high quality" environmental information, and that "accurate scientific analysis" is used when analyzing environmental effects. [Footnote 18] BLM's failure to include the habitat designations found in the Governor's Alternative does not meet this standard. BLM's incorporation of the Greater Sage-Grouse Core Area Protection from the Wyoming Governor's Executive Order 2011-5 (June 2, 2011) highlights the importance of adopting state specific solutions to sage-grouse management. [Footnote 19] The State of Idaho requests that BLM utilize the habitat designations and map found in the Governor's Alternative when reporting the effects of Gateway West on sage-grouse as it moves forward to the Record of Decision.	The Idaho Governor's Task Force recommendations are addressed in FEIS Section 3.11.1.3. The Governor's Alternative was finalized in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO,	Whenever practicable, BLM should site the Gateway West Transmission Line on federal land, especially when federal land is in close proximity to the study corridor BLM's insistence on siting its Preferred Alternative on private land, especially when federally managed land is in close proximity, is problematic. As noted above, we understand but do not accept the premise that BLM siting decisions do not also affect siting of energy infrastructure on private property. When	The BLM recognizes that its choice of preferred alternatives does impact where the transmission line may cross private and state lands. We have stated that we do not have the authority, however, to permit the transmission line across private and state lands and that precise routing would still need to be determined through local processes. Over half of the project would be located on federal lands, and most of that is on BLM-managed lands. We

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		OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	BLM dictates the point of entry and point of exit on public land, it by necessity decides what private land is affected. As an example, BLM's Preferred Alternative Route 5B parallels the Deep Creek Mountains, but is entirely located on private property. [Footnote 20] BLM cites visual resources near the Deep Creek Mountains as justification for refusing to site its Preferred Alternative on federally managed land. [Footnote 21] This is misguided reasoning because micro-siting will reduce the visual impacts of the Project. Moreover, the visual impacts remain virtually the same because the BLM's Preferred Alternative will be sited within the Deep Creek Mountains' view-shed. This is a classic example of an area that it is practicable for BLM to site the transmission line on federal land. Unless there is a compelling reason, BLM should place the Gateway West Transmission Line Project on federally managed land to the greatest extent possible. This includes areas where the line is placed on private property when federally managed land is in close proximity.	have worked cooperatively with the state and local governments for several years to analyze a range of alternatives. The BLM's preferred alternatives represent difficult choices and compromises among many different resources we are charged to manage and protect. We will continue to work with state and local government to resolve local issues.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	Specific Comments Related to <i>Lepidium Papilliferum</i> from Idaho Office of Species Conservation The Idaho Governor's Office of Species Conservation (OSC) coordinates the state's policies and programs related to the conservation of threatened, endangered and candidate species in Idaho [Footnote 22] OSC submits the following statement on the current status of slickspot peppergrass: <i>Lepidium papilliferum</i> , more commonly known as slickspot peppergrass, was removed from the "threatened" list under the Endangered Species Act by court order in August 2012. This decision was vacated because the U.S. Fish and Wildlife Service did not adequately define the term "foreseeable future" for slickspot peppergrass and the decision was not appealed by the Service. At this time there is no requirement to take special precautions in slickspot peppergrass habitat, as it is no longer on the "threatened" list.	While not federally listed, the BLM will continue to conference with the USFWS and will treat slickspot peppergrass as a species proposed for listing (67 Federal Register 46411). Refer to the USFWS's Biological Opinion attached to the ROD.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	The Idaho Sage-Grouse Task Force recommendations and Governor Otter's Alternative are discussed but not analyzed in the FEIS. IDFG offered to provide the habitat layers (core, important, and general) during our review of the AFEIS but we do not see evidence that the State's policy guidance for sage-grouse conservation was evaluated in the assessment of effects or mitigation recommendations. Please see the attached map for reference. A specific point to consider relative to evaluation of effects relative to the Idaho policy guidance of Governor Otter's alternative is that any loss of sage-grouse nesting or wintering habitat in core-designated habitat, regardless of ownership, is counted against the baseline for the habitat trigger.	The Idaho Governor's Task Force recommendations are addressed in FEIS Section 3.11.1.3. The Governor's Alternative was finalized in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis.

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101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	The FEIS continues to state that IDFG, as a member of the interagency technical group, recommends the Habitat Equivalency Analysis (HEA) (page 3.11-25) as the analytical tool for mitigation. To date, the Department has not offered a policy recommendation regarding the HEA or any other mitigation tool or mitigation strategy for this project. Our role has been to offer our technical expertise and advice to BLM and the Proponents to help them develop a HEA and its outcomes, including mitigation proposals, that are technically grounded.	The FEIS states that the framework developed by the interagency group recommends the HEA as a method for determining the extent of habitat services lost due to project-related impacts, as well as to scale the extent of necessary compensatory mitigation (p. 3.11-25). The BLM recognizes that IDFG has not offered a specific policy recommendation. The FEIS is, however, correct in stating that the IDFG was a member of the interagency group that developed the framework. The framework is provided in Appendix J of the FEIS. Appendix J-2 includes meeting notes and lists of participants for the multiple interagency meetings that were held between January 2011 and March 2012.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	No monitoring or mitigation is proposed for indirect effects to sage-grouse or any other wildlife. IDFG recognizes that the indirect effects of tall structures and potential increased predation and depredation by raptors and ravens (for example) are not fully understood and we understand that is why indirect effects were not addressed in the HEA (also see Appendix D within Appendix C, IPC's 2008 letter to the USFWS concerning indirect effects). However, the lack of knowledge or understanding is not the same as the lack of effect. We continue to strongly suggest that an indirect effects monitoring component, potentially under an adaptive framework with the potential for compensatory mitigation, should be a requirement of the Record of Decision for this project. The issue of indirect effects as they pertain to sage-grouse was vetted by the HEA team on a couple of different occasions (see HEA team meeting minutes from December 2011 and March 2012). It is our recollection that BLM committed to work with the proponents to address the issue; however, we are unaware that any progress has been made. The proponents propose that sage-grouse habitat mitigation will be conducted using a fixed, in lieu fee approach (Appendix C-3). The proponents did add a monitoring component but it is unclear what happens when monitoring determines mitigation isn't effective and the mitigation dollars are depleted. Because the HEA will provide a dollar figure estimate of cost to replace habitat services lost at a one-to-one mitigation ratio, it appears the benchmark (or currency) becomes dollars spent, not the actual acres of lost/impacted habitat mitigated or service restored. We reiterate that mitigation needs to include an effectiveness component. We are also concerned that the time lag between lost and restored services, particularly for habitat restoration projects, has not been adequately accommodated in mitigation discussion.	Mitigation plans are included in Appendix C of the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.

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101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	We are ambiguous about the respective proportions assigned by the proponents to regain lost services and the resulting adequacy/relevancy of projects (Appendix C-3): fence marking/removal (25%), sagebrush restoration (5%), seeding grasses and forbs (5%), juniper control (30%), and conservation easements (35%). We have previously commented to BLM and the Proponents about our perspective that conservation easements do not "regain" lost environmental services of habitat unless there is imminent threat to the habitat slated for conservation easement (i.e., if you are only protecting what is already there, you are not regaining something that was lost). We suggest the bulk of the mitigation effort should focus on strategically restoring and reconnecting sagebrush habitat (sagebrush restoration, seeding grasses and forbs, and juniper control) with an option for conservation easement on existing habitat imminently threatened by development or other land use.	The BLM agrees that restoring and reconnecting sagebrush habitat are important components of the mitigation plan, along with other important considerations addressed in the updated POD submitted by the Proponents (included with the ROD). The BLM also believes that preserving existing habitat through conservation easements is important.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG -- Table 2.7-1 and elsewhere -- TESWL-4 indicates sensitive species nests, burrows, colonies, etc. will be flagged. This is not a currently acceptable means of marking elsewhere or identifying a biological location.	The intent of TESWL-4 is that any nests, burrows, or colonies found will be flagged in the field by biologists in a manner that will allow other people to locate the nest, but not to disrupt active nesting/breeding use by sensitive wildlife species. Typically, a flag is positioned a sufficient distance away with distance and compass bearing. Flagging will be used only if appropriate. Flagging or not depends on the species, local conditions, and whether there is active construction.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG -- Table 2.7-1 and elsewhere -- According to the table, EPMs TESWL-4 through TESWL 11 will not and apply to State and private lands in Idaho. This could be problematic elsewhere for species like Columbian sharp-tailed grouse given over half of the occupied habitat in southern Idaho occurs on private property. Failure to apply spatial and temporal EPMs on private and State lands could exacerbate project-related effects on sharp-tailed grouse and other species of conservation concern.	TESWL-4 through -11 apply to state and private lands in Idaho in Segments 6, 8, and 9 of the Project, but not in the Idaho portion of Segment 4, or Segments 5 and 7. It would be up to the state agency to require these measures in the Idaho areas not covered. The BLM lacks the authority to require measures outside of federal lands when it has not been agreed to by the Proponents.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF	IDFG -- 3.10-8 and Table 3.10-1 -- Please clarify which definition of winter range, and subsequent big game winter range data set, was used in the analysis. Text on page 3.10-8 states "General winter range has certain year-long stipulations related to it that restrict certain types of development. Crucial winter range is dosed to physical access during	The following layers, specific to Idaho, were used for the EIS. The decision of which layers to use was based on a meeting with IDFG and Idaho BLM staff in November 2009. The only update requested for big game during the EIS process was to identify bighorn sheep lambing areas which was provided in December

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		PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	winter, though an exception process exists for certain activities. Designated general and crucial winter range (Wyoming) and winter range (Idaho) will be referred to collectively in this document as "winter range." We are unclear whether access to winter range in Idaho is subject to stipulations or physical closure. Further, footnote 2 on page 3.10-3 defines winter range as "a portion of winter range... during the heaviest snow cover." It is unclear whether a subset of winter range data was used in the analysis based on this definition.	2012 and used for the Final EIS. Winter Range - Bighorn Sheep: IDFG_BHSheep_Draft20091105_DONOTDIST Winter Range – Pronghorn: IDFG_Gateway Pronghorn Winter Range Winter Range - Mule Deer: IDFG_MVD_deer winter range02 Winter Range – Elk: IDFG_MVD_elk winter range 2002.shp <u>and</u> PFO_biggame_region_elk_shp Winter Range - Mule Deer: IDFG_SED_Critical Deer Winter Range Winter Range - Mule Deer: IDFG_SED_deerwinter3_Clip1 Winter Range - Mule Deer: IDFG_SED_deerwinter3_Clip1 Winter Range – Elk: IDFG_SWD_Critical Elk Winter Range The Pocatello RMP states that “ <i>Motorized vehicles would be restricted to existing roads from May 15 to June 30 within known or discovered calving/fawning areas. Snowmobile use restricted in mapped big game winter range.</i> ”
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG -- 3.10-45 -- The grassland fragmentation discussion is poorly worded and based on assumptions not supported by the analysis or literature.	While this statement in Section 3.10 of the FEIS may be poorly written, Section 3.10 states elsewhere that "Native grasslands (dominated by native species) are an important wildlife habitat type but are rare and decreasing within the Analysis Area." The FEIS discloses that there is very little undisturbed grassland in the analysis area. The FEIS discusses grassland vegetation in Section 3.6, noting that while grasslands are present along all segments, accounting for approximately 16 percent of the area crossed; almost all of these grasslands are disturbed grassland, not native grassland. Over 60 percent of the analysis area is covered with shrubland vegetation. The abundance of the two vegetation types suggests that animals would be able to move to adjacent areas while the ROW is being restored. This was the intent of the statement commented on.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG -- 3.10-49 -- The analysis states "ROW maintenance would remove thermal and hiding cover... This habitat loss is not likely to have a substantial impact on big game populations, as this is a minor loss relative to the amount of home range that big game species typically range over (usually hundreds of acres up to ten thousand acres). In addition, transmission line structures and access roads are not expected to affect the movement or distribution of big game species through fragmentation; big game will readily cross a double-track road or pass under a transmission line. Approximately 36 percent of the line is collocated with existing developments, which minimizes new disturbances by collocating the line in areas where existing lines already occur, thereby decreasing the potential impact of the Project on big game migratory movements." This reasoning is problematic because it	The comment is correct; the analysis does imply that big game would likely shift use to other areas during the brief period when maintenance is performed. We believe that this is a reasonable conclusion given that maintenance activity would affect a narrow strip of land in habitats where forested areas are crossed, and would occur once every few years at most. This activity would occur outside of seasonal restricted periods. ROW clearing would not be necessary in most of the project ROW because the vegetation does not naturally grow over 35 feet tall in grass and shrub habitats.

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			assumes 1) no impact occurred to big game movements when the existing developments were built, which in many (most) cases cannot be confirmed and 2) there's no threshold of development at which continued big game movement is disrupted/ceases. In the absence of site-specific data or studies, the only way these statements can be substantiated is through pre- and post-construction monitoring. The analysis also states that a loss of habitat is minor relative to the amount of habitat available, implying that big game would likely shift use to other areas. This statement assumes suitable, unoccupied, and accessible habitat exists in close proximity. We are unaware these conditions occur.	
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG -- 3.11-27 -- The essence of the USFWS's current listing decision was that Factor A (habitat fragmentation-fire) and Factor D (regulatory mechanisms) were significant threats to sage-grouse, resulting in the determination that listing was warranted. As such, it is unclear to us why the discussion of the listing decision is not more focused on Factors A and D, rather than mentioning habitat loss in the same context as non-significant factors like hunting (Factor B).	The paragraph referred to in the comment on page 3.11-27 provides an overview summary of the regulatory status of greater sage-grouse under the ESA. It does not analyze which factors the USFWS found more or less significant in its decision; however, the discussion does note both habitat loss and inadequate regulatory mechanisms as reasons the USFWS provided for the "warranted but precluded" status of the species.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG -- 3.11-27 -- We are troubled by the inference of the statement "Although there is concern regarding this species' current status, hunting of this upland game-bird is still permitted by many states, including Idaho and Wyoming." We suggest removing the statement because it has no bearing on the analysis of the environmental effects of a transmission line. The USFWS concluded that Factors A (habitat) and D (regulatory mechanisms) were significant threats to sage-grouse, resulting in their finding that listing was warranted. Hunting falls within Factor B (use). In regards to hunting as it relates to Factor B, the USFWS concluded: "The present level of hunting mortality shows no signs of being a significant threat to the species. However, in light of present and threatened habitat loss (Factor A) and other considerations (e.g., West Nile virus outbreaks in local populations), States and tribes will need to continue to carefully manage hunting mortality, including adjusting seasons and harvest levels, and imposing emergency closures if needed." IDFG has adjusted or closed its sage-grouse hunting season as needed throughout the years. In 1996 IDFG began to consistently make hunting seasons more conservative. In 2000, IDFG instituted a permit system to hunt sage-grouse and sharp-tailed grouse to allow us to better track and estimate harvest numbers. About the same time, we implemented "Sage-grouse Reporting Zones" which were defined based	The statement referred to in the FEIS is included to provide a complete summary of the regulatory status of the species in the states crossed by the Gateway West Project. As hunting is an activity that would be prohibited were sage-grouse to be federally listed under the ESA, we believe it is relevant to note that hunting is currently still allowed in Idaho and Wyoming. Also, as noted in Section 3.11.2.2, increased poaching/hunting along the ROW due to an increase in human activity and access created by new roads is an indirect effect to sage-grouse from project operations. Therefore, the current legal status of hunting has bearing on the analysis of the environmental effects of a transmission line.

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			on known sage-grouse ecology and movements, topographical barriers, and administrative boundaries in some areas. In 2008, IDFG began to formally follow the hunting season and bag-limit guidelines in the Conservation Plan for the Greater Sage-grouse in Idaho (Idaho Sage-grouse Advisory Committee 2006}. This process allows for annual evaluations at the local level that considers circumstances that can change annually.	
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	IDFG -- 3.11-123 -- Please provide scientific rationale for determination that vegetation clearing is not expected to negatively affect bighorn sheep "due to the small amount of habitat affected compared to the large home ranges of this species, and the stimulation of forage growth that vegetation clearing could induce (i.e., clearing of shrubs can increase herbaceous species growth by increasing light penetration to ground surfaces)." This assertion assumes 1) soil disturbance associated with vegetation clearing will not create an environment for invasive annuals or other unwanted vegetation, 2) the affected habitat is not limiting so its loss will have little effect, and 3) suitable unoccupied habitat exists elsewhere. None of these assumptions can be supported.	The EIS includes measures to prevent invasive weeds from becoming established, monitoring to insure these measures are successful, and requirements for rework if they are not (see Table 2.7-1). Very little habitat is involved. Approximately 75 acres of bighorn sheep habitat would be crossed by the preferred route for the entire Gateway West Project.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	Land Use 3.17-21 (Figure 3.17-3) -- The OCTC is not identified, nor is the associated Airspace Restriction. This has still not been corrected.	The OCTC is addressed in Section 3.17.2 of the FEIS, and identified in many figures in the FEIS and its appendices, including Figure 3.17-9. Different figures of the same general area highlight different features in color to avoid making maps that are too complicated to follow.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	2.1.1 Structure Lighting) Page. 2-11 -- The current power line poses a safety issue and reduces the overall area for training because they are not lighted. As such, The IDANG strongly recommends that the lighting standards be included in all alternatives as they relate to the area between Gowen Field and the OCTC (MP 90-108 roughly).	The existing 500 kV transmission line does not belong to the Proponents, Rocky Mountain Power or Idaho Power. Requiring the Proponents to install lights on another company's transmission line is not within the scope of the project.

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101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	3.17-20 (Land Use and Recreation) -- IDARNG training is only restricted in areas of 10% or greater canopy density in shrub communities per the 2008 RMP.	The comment is correct that the RMP only restricts training from shrub stands with 10 percent or greater canopy cover. The FEIS is consistent with the summary statement on page R-1 of the Record of Decision for the 2008 RMP, which provides an overview of key decisions without going into detail about the definition of shrub community in the plan: "...by limiting vehicular maneuver training to non-shrub communities to protect existing shrub communities. "
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	We appreciate the additional visual analysis done for Bruneau Dunes State Park. Bruneau Dunes State Park is a special place. The park boasts the tallest single-structured sand dune in North America with a peak rising 470 feet above the surrounding desert floor. Visitors are able to explore the dunes in hiking boots or on skis or snow board; fish for bluegill in the lakes; unlock the mystery of the desert with a breathtaking hike or horseback ride; plan a group picnic or visit the Bruneau Dunes Observatory and gaze at the night sky through the Observatory's collection of telescopes. Visual Quality is a high visitor value for the park. The proposed power line will impact the visual quality of the park. How much of an impact it will have depends on where the power line will be constructed. Alternative 9E (BLM Preferred) only passes by the park on the southern boundary. Alternative 9D (Owyhee County Preferred) passes by the park on the southern boundary and the eastern boundary. Alternative 9D has a greater visual impact on Bruneau Dunes State Park than Alternative E. The power line will have to be micro sited to lessen the visual impacts to Bruneau Dunes State Park and other recreation facilities along Alternative D's route. It also appears that Alternative 9D would impact more private property owners in Elmore and Ada Counties.	The BLM is continuing to work with state and local governments to resolve siting issues in Segment 9 of the Project, and is deferring a decision on Segment 9 at this time. Your input on visual impacts is noted and appreciated.
101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	Another issue that will have to be addressed is the lighting to the power line towers for the U.S. Air Force Aircraft traveling to the Saylor Creek Range. Lighting of the towers can potentially impact Dunes night sky viewing opportunities. We are confident by working with the U.S. Air Force and Idaho Power; we can find a solution that minimizes the impacts to Bruneau Dunes telescopes and night viewing opportunities.	The Air Force requested the towers be lit for the safety of the pilots; therefore, the BLM supports this request. The BLM also supports the Department of Parks working with the Air Force to find a solution to this issue.

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101031	CHARLIE BAUN, JOHN CHATBURN, NANCY MERRILL	STATE OF IDAHO, DEPARTMENT OF FISH AND GAME, STATE OF IDAHO, DEPARTMENT OF PARKS AND RECREATION, STATE OF IDAHO, OFFICE OF ENERGY RESOURCES, IDAHO ARMY NATIONAL GUARD	The Idaho Department of Parks and Recreation prefers a route (Alternative 9E) that minimizes impacts to Bruneau Dunes State Park.	Your support is noted. Alternative 9E is part of the BLM's preferred route. We note that the Governor supports a different route. The BLM is continuing to work with state and local governments to resolve siting issues in Segment 9 of the Project, and is deferring a decision on Segment 9 at this time.
101032	DEANNA LEWIS		Yes, put this through the Birds of Prey area and away from our homes!!	Your comment is noted. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Project.
101033	RICK JOHNSON		There Taken away the beauty of our land, and if the government pushes it then it will be a big screw up like they always do, or end up doing.	Your comment is noted. Visual effects are analyzed in Section 3.2 of the FEIS.
101036	STEVE NETTLETON, ROBERT NETTLETON, WILLIAM F SCHROEDER	EDITH NETTLETON TESTAMENTARY TRUST	The "Preferred Alternative" will destroy the value of the following private land in our title, the highest and best use of which is subdivision residential adjoining the Snake River and the secondary use as irrigated agricultural. The land is described as Township 1, South, Range 2 West, B.M Owyhee County, Idaho, Section 21, Lots 6 and 5, and Section 28, Lots 4 and 5. The described land is immediately adjoining SRBOP and entitled to the same protection as provided to it and would be lost if the "preferred alternative" is adopted.	Your comment is noted. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Project.
101037	MIKE ELLIS		I strongly disapprove of the route from the substation at the junction of WY highway 77 and 487 to the proposed Aeolus substation. This part of the route goes through Foxley & Co property which is very rough country consisting of mainly red soil and very steep, high red rim rock. This country has sparse vegetation and when the vegetation is damaged it is difficult for it to recover. It is also prone to extreme erosion especially after it has been disturbed. The impact during the construction phase of this project would be extremely severe.	Your opposition to BLM Preferred Route 1W(a) and 1W(c) is noted. Impacts to vegetation are analyzed in Section 3.6 of the FEIS, and impacts to soils are discussed in Section 3.15.
101037	MIKE ELLIS		This part of the route is also crucial winter range for the very large Shirley Mountain Elk herd and a struggling Mule Deer population. There is also a diminishing population of Sage Grouse within the power line corridor. In addition, it is also very unique in its geology, nearly all of the geologic formations are exposed so one can study them. The University of Wyoming has spent years studying this area.	Your opposition to BLM Preferred Route 1W(a) and 1W(c) is noted. Impacts to wildlife are disclosed in Sections 3.10 (big game) and 3.11 (sage grouse) of the FEIS. Geologic hazards are assessed in Section 3.14.
101037	MIKE ELLIS		I would like to propose an alternate route for the Gateway West Transmission project. My proposal starts from the substation at the junction of WY highway 77 & 487. It would run in the same corridor as the new existing transmission line that carries power from the Dunlap wind farm. The line would go south along the north end of the wind	Your proposed alternative is similar to some portions of former Segment 1E, which was dropped by the Proponents between the draft and final EIS because they no longer had a need for an the line (see Section 1.1.1 the reason this alternative was eliminated). It is also similar to some of the alternatives that were eliminated

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			<p>farm with more than 1500 ft. of distance from any wind turbine then turn west ending at the proposed Aeolus substation. This proposed route is flat and smooth with very good vegetation and most of the construction on this route could be done overland with minimal impact. I believe what mileage difference there would be in the two routes, the reduced cost of construction of the alternate route would make it worth considering.</p> <p>In the alternate route that I have proposed there would be three land owners involved, the major one being Rocky Mountain Power i.e. Pacific Corp. The other two have already sold land for substations on this project. Attached is a map of the proposed alternate route.</p>	from detailed study. Please refer to Section 2.4.12 and Appendix O for the reasons these alternatives were eliminated and maps of those routes dropped from consideration.
101038	GAYLE BATT	STATE OF IDAHO, LEGISLATIVE DISTRICT 11	<p>Please understand that there is great frustration with BLM not choosing to site the transmission line on Federal land. If not sited on federal land, the transmission line poses the threat of dividing up productive farmland, land that produces the economic foundation for this community. The Melba area offers global and local seed companies considerably large tracts of farmable acres suitable specifically for the production of seed crops. The essential growing traits for seed crops present in this area include fertile soil, a reliable source of affordable irrigation water, open airspace ideal for aerial applicators, level fertile soil, proper climate and length of growing season and very necessary pollination isolation from other crops. The combination of growing conditions unique to this growing region needs to be taken into consideration.</p>	Impacts to agricultural lands are discussed in Section 3.18 and Appendix K of the FEIS. The BLM is continuing to work with local government and stakeholders to seek a consensus solution to routing issues in Segment 8 near Melba.
101038	GAYLE BATT	STATE OF IDAHO, LEGISLATIVE DISTRICT 11	<p>I do believe the greatest slap in the face to my constituents and those around the negotiating table, was to have BLM in Washington, D.C., choose NOT to implement the consensus routes that resulted from collaboration of diverse stakeholders. Working in the natural resource policy arena, I learned firsthand the rarity of consensus on resource issues. These collaborative processes take significant, time, energy and financial resources, and rarely end in success. What a shame for BLM, one who encourages such collaboration, to infer these stakeholders and their on the ground input do not matter.</p>	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with state and local governments, as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.
101038	GAYLE BATT	STATE OF IDAHO, LEGISLATIVE DISTRICT 11	<p>On a final note, it appears that no good deed goes unpunished. I do believe that choosing not to site on the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP-NCA) will send a loud message to the power companies and others, who may in the future have the opportunity to provide enhancements on federal land, to say, "No thanks." Without Idaho Power's commitment to better this state through endowments and enhancements such as the SRBOP-NCA, the conservation area would not exist. Their dedication to the habitat for these creatures is now biting them in the behind, and potentially costing them, the ratepayers and the private landowners dearly.</p>	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with state and local governments, as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.

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101039	CAROLYN FIRTH, JOHN FIRTH		We are very much opposed to transmission lines crossing prime irrigated cropland in Cassia County. One line is very detrimental, but once a corridor is established, it will be very easy for additional power lines to be constructed. The EIS should take this into account, as the ultimate damage to agriculture could be catastrophic.	Your opposition is noted. Impacts to agricultural lands are discussed in Section 3.18 and Appendix K of the FEIS. Cumulative effects are also analyzed in Chapter 4. The impact to agriculture is expected to be small overall; however, individual operators may be significantly effected and losses would be negotiated with the Proponents during the easement acquisition process.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	[Twin Falls MFP Amendments FEIS F.1-31, Jarbidge RMP FEIS F.1-37] We are also concerned about impacts to paleontological resources (Sugar Bowl, Glenns Ferry and McGinnis Ranch) and Oregon Trail ruts by amending the RMP to allow the transmission line to be constructed in prohibited areas. F.1-43. If any amendment is considered here, the BLM needs to build additional sideboards so that the special geologic and historic resources of these area are awarded high protections from future incursions or that the BLM receive additional resources for research and interpretation.	The effects of the proposed amendments to the Twin Falls MFP and Jarbidge RMP are discussed in Sections 3.7.4 and 3.8.4 of Appendix F-1, respectively. These sections include an overview of environmental protection measures that would be put in place in each case to protect affected resources.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	We are concerned about the amendments regarding the addition of new utility corridors, incursions into the few remaining non-motorized areas, the adverse impacts to visual resources such as Sinkers Creek Canyon and negative effects to special status species such as slickspot peppergrass, and signature species such as prairie falcons, golden eagles and other raptors. SRBOP F.1-51. We are particularly concerned about allowing motorized intrusions into the Halverson Bar and Cover non-motorized areas. These amendments should either be struck or significantly modified to address these concerns. In addition, the BLM needs to ensure that the Gateway West Transmission line is actually compatible with the NCA and that the project will ultimately enhance raptor habitat. While we appreciate the concept of ratios of up to 5:1 for restoration of shrub and grasslands, the BLM needs to further develop this proposal to avoid, minimize and mitigate impacts. Any mitigation ratio needs to factor in the success rate of vegetation restoration efforts, the rate of habitat loss due to wildfire, the lag time before any actual mitigation is realized. The actual ratios may be much greater. Additional mitigation measures such as inventorying cultural resources, hiring additional law enforcement and enhancing scientific and education efforts need to be further developed before any amendments are considered. As a form of partial mitigation, the BLM should examine the feasibility of permanently expanding the NCA in key areas by acquiring private property from willing sellers.	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with state and local government, as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	We are also concerned that the southern routes will have substantive negative effects on sage-grouse and that developing these routes may not be feasible with sage-grouse protections.	The BLM is continuing to work with state and local governments, as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Amendments are also being considered that would affect the Snake River Special Resource Management Area that would simply reduce the SRMA designation by 6,400 acres. F.1-56. The BLM somehow states	The FEIS states that the reduction in lands available for recreation could affect the overall goals for recreation management (F.1-58). The BLM is continuing to work with state and local governments,

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			that recreational goals for the Oregon National Historic Trail and C.J. Strike SRMAs would not be impacted because these lands would have been removed from designation, but certainly the amount of land emphasized for recreation and the quality of that recreation would be affected.	as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Bruneau RMP We are concerned about the cumulative effects of the lowering the visual standards for the Bruneau RMP because additional infrastructure elements could be considered and would have an improved ability to be permitted. F.1-65.	Your concern for visual effects within the Bruneau RMP area is noted. The FEIS acknowledges visual impacts in this area in Section 3.2 as well as Appendix F-1 and Appendix G. The BLM is continuing to work with state and local government, as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Kuna MFP Allowing amendments to the Kuna MFP could adversely impact wildlife, vegetation, soils and cultural resources. F.1-71. We are particularly concerned about impacts to water quality, fisheries, elk winter range, and raptors. We believe that this amendment should be rewritten to ensure that these other resources are properly protected and not impaired.	Your concern for environmental effects within the Kuna MFP area is noted. The FEIS acknowledges resource impacts in this area in multiple sections. The BLM is continuing to work with state and local government, as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Caribou-Targhee National Forest The proposed Forest Plan amendments regarding snag protections for cavity nesters needs to be offset by increasing protections for cavity nesters in other areas. One possibility would be expanding the areas off-limits to firewood collectors where such trees are at risk. F.2-13. Similarly, the amendment affecting goshawks, snags, visuals, Aquatic Influence Zones, woodpeckers, semi-primitive recreational should contain additional mitigation measures. F.2-14-18.	The analysis in the FEIS did not conclude that additional mitigation measures were necessary for the loss of snags. The cumulative effect of this project, along other activities, would be a total disturbance of 3.9 percent in the North Creek Watershed and of 2.5 percent in the Trout Creek Watershed. This is well below the Forest objective for disturbance. Also, refer to the Biological Evaluation (BE) prepared for the FEIS for a discussion of the effects on these species.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Sawtooth National Forest The amendments for visual resources should also be balance with increased protections for other areas on the Forest. F.2-28	The Preferred Route for Segment 7 avoids the Sawtooth NF; therefore, the amendments for visual resources will not be implemented.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	NEPA analysis These amendments have not yet gone through the full NEPA process. The analysis of the effects of these amendments is tiered to the Gateway West Final Environmental Impact Statement which is open for public comment until June 28, 2013. The BLM is still accepting public comments, responding to comments, refining alternatives and no final Record of Decision has been issued. It is very helpful when assessing such projects to incorporate RMP amendments into the EIS process so the actual impacts are fully analyzed and disclosed. Closing the protest period on the RMP amendments before the completion of the full analysis is an inappropriate segmentation of NEPA. We are particularly concerned because several of these amendments were not proposed in the original DEIS so the public has not had an adequate opportunity to review them.	The BLM followed regulations for protesting planning decisions. These regulations specify a 30-day protest period. Please refer to the BLM's response to the Protest (Appendix K to the ROD).

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101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Cumulative effects The BLM amendments underestimate the likelihood of additional infrastructure projects utilizing the same ROW, leading to increasing impacts to other resources. The BLM needs to adopt additional protections for these remaining resources to ensure that they are properly managed and maintained.	Numerous mitigation measures are included in the FEIS, summarized in Table 2.7-1 and detailed in Appendix C. The potential for cumulative use of the ROW is assessed in Chapter 4 and in conjunction with proposed plan amendments in Appendix F-1.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	<p>Sage-grouse</p> <p>We are particularly concerned about impacts to sage-grouse and ask that the BLM craft any amendments to avoid, minimize and mitigate impacts. Sage-grouse were recently determined to warrant full protections under the Endangered Species Act but were precluded by higher priorities. One of the top threats to sage-grouse are infrastructure projects: Disturbance to important seasonal habitats: Human activity and noise associated with machinery or heavy equipment in proximity to occupied leks or other important seasonal habitats may disturb sage-grouse.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-125 The Conservation Plan also recommends developing off-site mitigation for unavoidable impacts: Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126 With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation: Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126 The BLM should consult closely with the Idaho Department of Fish and Game and the Local Sage-grouse Working Group to determine appropriate measures to avoid, minimize and mitigate impacts. The BLM, when considering mitigation requirements for adverse sage-grouse effects, needs to consider both the appropriate spatial scale for considering effects of proposed management activities on sage-grouse and their habitat as well as the adverse impacts of invasive exotic plant species, and the increased threat of wildfire. Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the</p>	Impacts to sage-grouse are addressed in Section 3.11 of the FEIS and extensive mitigation measures are included to avoid, minimize, and mitigate impacts. Table 2.7-1 summarizes these measures and they are detailed in Appendix C. Following FEIS comments, the Proponents completed an Habitat Equivalency Analysis (HEA) for indirect effects. The Proponents submitted additional mitigation for indirect effects to sage-grouse based on the results of the HEA. Mitigation measures were developed in consultation with state and local groups, including an interagency group consisting of the BLM, USFWS, IDFG, and WGFD that developed the analysis framework for assessing impacts to sage-grouse. Appendix J to the FEIS includes the framework and the HEA conducted to inform mitigation requirements for direct effects. The EIS includes seasonal restrictions for both construction and maintenance, refer to Appendix I to the FEIS.

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			<p>different habitats throughout the year. Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below:</p> <p>1) Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush.</p> <p>2) Movement to winter habitat.</p> <p>3) Occupation of winter habitat from November through February. The primary requirement of winter habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges.</p> <p>4) Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009).</p> <p>5) Female movement to nesting sites and nesting between March and June. Nesting females commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007)</p> <p>6) Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks.</p> <p>Knick and Hansen (2009) analyzed factors in lek persistence of over 5,000 leks. They used three radii to test for landscape disturbance effects on lek persistence – radii of 3.1 miles, 11.2 miles, and 33.5 miles. Previous studies had shown behavioral effects on sage-grouse related to sagebrush disturbance at the 33.5 mile radius (Swenson et al. 1987, Leonard et al. 2000). Knick and Hansen’s study showed adverse effects on lek persistence from wildfire at the 33.5 mile radius.</p> <p>Avoiding and minimizing human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and</p>	

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			brood-rearing habitats. Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, additional mitigation efforts will be needed for disturbance to sagebrush near lekking areas; disturbance and loss of sagebrush and native forbs used for early brood-rearing; and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing. A conservative estimate for the nesting and brood rearing area affected will include buffers with radii of 6.2 miles around known leks. Mitigation specifics could be based on a mitigation template recently created for the Lesser Prairie Chicken, a ground-nesting species facing similar threats (Horton et al. 2010).	
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Regarding adverse impacts from invasive exotic species, including increased wildfire risk, the BLM needs to address concerns about cheatgrass establishment and spread. Once cheatgrass becomes established in a sagebrush community, its effects cascade in synergistic feedbacks toward increasing dominance resulting from increased fire disturbance, loss of perennial species and their seed banks, and decreased stability and resilience to changes in the surrounding landscape (Miller 2009). Effective cheatgrass prevention after disturbance is most likely with the establishment of a healthy native vegetation community. The BLM needs to identify the baseline vegetation conditions and the desired post-reclamation plant community, and require post-project monitoring of the reclaimed areas and repeated revegetation treatments as necessary until the desired vegetation is established. The footprint for areas to be revegetated and monitored should include a 5m buffer around linear disturbances such as roads. Suggested monitoring protocols could include Interpreting Indicators of Rangeland Health (IIRH, Duniway 2010).	Existing vegetation conditions are discussed in Sections 3.6 (Vegetation), 3.7 (Special Status Plants), and 3.8 (Invasive Plant Species). Environmental protection measures to prevent cheatgrass spread are included in Table 2.7-1 and Appendix C, and discussed in Section 3.8.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	We are also concerned that all routes impact the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) to some degree. However, as mentioned in separate letters, the BLM has thus far failed to conduct the required compatibility and enhancement analysis needed to determine if any of the transmission line routes are consistent with the NCA's regulations.	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with state and local governments, as well as other stakeholders, to seek a new consensus route in Segments 8 and 9 as part of a phased decision approach.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	We have submitted comments throughout project development and have also submitted a protest on the proposed RMP amendments for this project. We have also 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.	This comment is noted. All comments submitted during the public comment periods for Gateway West are part of the project record.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	We support the proposed phased decision approach as the best way to further improve routing decisions. We look forward to working with the BLM, additional federal agencies and interested parties to site a	The BLM has decided to follow the phased decision approach, and will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the

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			project that preserves and enhances Idaho's sage-grouse and conservation areas and provides the needed utility services to Idahoans. Please keep us on the mailing list for this project.	Gateway West Project. The current decision only applies to BLM-managed lands in Segments 1 through 7 of the Project.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	While we appreciate the additional information provided in the FEIS, we are concerned that members of the public will not have an opportunity to both submit comments and review a draft document and assess how these concerns are being addressed. We are supportive, however, of the proposed phased decision approach which will allow the BLM to proceed with a decision for certain routes while allowing additional time where needed to find the most appropriate location, to further refine mitigation measures, and to make a more informed and supportable decision.	The BLM has decided to follow the phased decision approach, and will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project. The current decision only applies to BLM-managed lands in Segments 1 through 7 of the Project.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	We are particularly concerned about construction of transmission facilities within or adjacent to habitat for sage-grouse. We urge the BLM to select an alternative in previously developed areas or along existing corridors to avoid impacts to sage-grouse. Where there still may be impacts to sage-grouse, these impacts should be avoided through design features and mitigated by utilizing Idaho's mitigation framework for sage-grouse.	Impacts to sage-grouse are addressed in Section 3.11 of the FEIS and extensive mitigation measures are included to avoid, minimize, and mitigate impacts. Table 2.7-1 summarizes these measures and they are detailed in Appendix C. Following FEIS comments, the Proponents submitted additional mitigation for direct and indirect effects to sage-grouse. Mitigation measures were developed in consultation with state and local groups, including an interagency group consisting of the BLM, USFWS, IDFG, and WGFD that developed an analysis framework for assessing impacts to sage-grouse. Appendix J includes the framework and Habitat Equivalency Analysis (HEA) conducted to inform mitigation requirements.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	<p>There is significant concern regarding the long-term viability of greater sage-grouse populations. The US Fish and Wildlife Service has determined that sage-grouse are warranted but precluded under the Endangered Species Act and will be revisiting this determination in 2015. Greater sage-grouse suffer from the loss, degradation, and fragmentation of habitat throughout the west. It is estimated that only 50-60% of the original sagebrush steppe habitat remains in the west (West 2000), and in 2007, the American Bird Conservancy listed sagebrush as the most threatened bird habitat in the continental United States. [Footnote 1] As such, we cannot stress enough how important it is for agencies to consider impacts to sage-grouse and for public land managers to conserve existing habitat and actively restore altered sagebrush steppe habitats.</p> <p>Impacts of transmission lines on sage-grouse</p> <p>As stated in our previous comments, we are particularly concerned about impacts to sage-grouse and ask that the BLM avoid, minimize and mitigate impacts. One of the top threats to sage-grouse is infrastructure projects:</p> <p>Disturbance to important seasonal habitats: Human activity and noise associated with machinery or heavy equipment in proximity to occupied leks or other important seasonal habitats may disturb sage-grouse.</p>	Impacts to sage-grouse have been avoided, minimized and mitigated where feasible. See Section 3.11, Appendices C and J, as well as Table 2.7-1 summarizes these measures and they are detailed in Appendix C. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. Mitigation measures were developed in consultation with state and local groups, including an interagency group consisting of the BLM, USFWS, IDFG, and WGFD that developed an analysis framework for assessing impacts to sage-grouse. Appendix J includes the framework and Habitat Equivalency Analysis (HEA) conducted to inform mitigation requirements. The Idaho Governor's Task Force recommendations are addressed in FEIS section 3.11.1.3. The Governor's Alternative was finalized in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat

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			<p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-125 Depending on location and design specifics, the construction of transmission lines within sage-grouse habitat constitutes “nonlinear infrastructure” under the Conservation Plan for the Greater Sage-grouse in Idaho (Idaho Sage-Grouse Advisory Committee 2006). Nonlinear infrastructure is defined as “human-made features on the landscape that provide or facilitate transportation, energy, and communications activities...including wind energy facilities.” [Footnote 2] The Conservation Plan lists infrastructure such as this as the second greatest threat for sage grouse, with wildfires as the greatest risk. Road construction and use associated with transmission line maintenance represents high risk for loss of lek areas, nesting locations, and brood-rearing habitats (Braun 1986, Connelly et al. 2004). [Footnote 3,4] In addition, sage-grouse have been shown to avoid transmission lines, presumably because of potential predation. Ellis (1985) found a 72% decline in the average of males on leks and a 65% increase in predation efforts involving raptors following the construction of a transmission line within 200 m of an active sage-grouse lek in northeastern Utah. [Footnote 5] Sage-grouse lek attendance dropped significantly following power line construction within 3 miles of leks in California. [Footnote 6] In a comprehensive study of ecological requirements, sage-grouse were extirpated in areas where power line densities were above 0.20 km/km² and sage-grouse habitat was ranked highest where powerlines were less than 0.06 km/km². [Footnote 7]</p> <p>Furthermore, the Governor of Idaho has submitted the State of Idaho’s Alternative [Footnote 8] for incorporation into the National Greater Sage-Grouse Planning Strategy. This alternative describes additional restoration efforts and additional regulatory mechanisms to stabilize and restore sage-grouse populations, protect sage-grouse habitat and to preclude the need to list sage-grouse. This plan is being analyzed by the BLM as an alternative for the RMP amendments required by law and which the USFWS is going to review in 2015. The Idaho Conservation League served as a member of the Governor’s Sage-grouse Task Force which drafted this plan. A key component of this plan is to avoid placing large-scale infrastructure projects such as 500kV transmission lines within core and important sage-grouse habitat as defined by the plan due to the negative effects that transmission lines have on sage-grouse.</p> <p>Regarding the spatial scale of proposed management activity effects on sage-grouse and habitat, the BLM should recognize that sage-grouse can require movements of tens of miles between required habitats. Thus, a significant challenge in managing and conserving sage-grouse populations is the fact that they depend upon different types of habitat for each stage of their annual cycle (Connelly et al. 2009), and upon the ability to move between the different habitats throughout the year.</p>	<p>designations from the Task Force were not incorporated into the FEIS analysis. Also see the response below.</p>

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			<p>Each seasonal habitat must provide the necessary protection from predators, required food resources, and thermal needs for the specific stage of the annual cycle. Breeding-related events and season habitat needs are described below:</p> <p>1) Late brood-rearing period in July through September. Late brood-rearing is focused in wetter areas, especially riparian and spring-associated meadows closely associated with nearby sagebrush.</p> <p>2) Movement to winter habitat.</p> <p>3) Occupation of winter habitat from November through February. The primary requirement of winter habitat is sagebrush exposure above the snow, and is generally characterized by dense sagebrush, often including areas of wind-swept ridges.</p> <p>4) Lekking, which may begin as early as late February, and may extend into May. Lekking requires open expanses of sagebrush within a large area of sagebrush cover. Lek persistence has been affected by disturbance activities within 3.1, 11.2, and 33.5 mile radii (Swenson et al. 1987, Johnson et al. 2009, Knick and Hanser 2009).</p> <p>5) Female movement to nesting sites and nesting between March and June. Nesting females commonly move 3-5 miles or farther from the lekking site. Females select areas with more sagebrush canopy than is generally available in the surrounding landscape (Holloran et al 2005, Hagen et al. 2007)</p> <p>6) Hatching and early brood-rearing in May and June. Females continue to use relatively dense stands of sagebrush for earliest brood-rearing habitat if native forbs and insects are available. When vegetation desiccates, females and broods move to wetter areas in search of the native forbs and insects required by chicks.</p> <p>Given the considerations of year-round habitat use and known impacts of human activity on sage-grouse populations, particular care needs to be taken to avoid disturbance near lekking areas, disturbance and loss of sagebrush and native forbs used for early brood-rearing, and disturbance and impacts to hydrologic function of wet areas used for early to late brood-rearing.</p> <p>Avoiding human footprint at a 3.1 mile radius from leks is an important first step in protecting sage-grouse populations, but sage-grouse could be engaged in nesting and brood-rearing, in addition to lekking, for much of the planned construction activity period. Recent studies have shown that only 64% of nesting sites occur within 3.1 miles of leks, but 80% of nests are found within five miles, and 20% of nests occur at distances greater than five miles from leks. Nest success is also greater the farther a nest occurs from a lek, indicating a disproportionate potential importance of these more important nests for population recruitment.</p> <p>Based on the habitat guidelines for sage-grouse management presented in Connelly et al. (2000), [Footnote 9] and others, we recommend siting</p>	

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			the transmission line far enough from leks and other sage-grouse habitat to avoid negative effects. Aldridge and Boyce (2007) and Doherty et al. (2010) identify a buffer of 6.2 miles to protect important nesting and brood-rearing habitats.	
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	<p>Currently, several potential segments go through or come too close to sage-grouse habitat as defined by the State of Idaho's Alternative. Routes that may affect Core or Important Habitat Zones, even indirectly, should not be selected. Routes that may affect General Habitat Zones should be fully mitigated through the State of Idaho's Mitigation Framework. These include the following segments:</p> <ul style="list-style-type: none"> •Segment 4 at location 4e where the line goes through Important Habitat Zone and subsequently General Habitat Zones northwest of Bear Lake •Segment 5B and the routes to the south and west of 5B •Segments 6 which all appear to go through the General Habitat Zone •Segment 7K or the Stateline segment which goes through the Important Habitat Zone a •Segment 7 northwest of Albion which appears to go through General Habitat Zone •Segment 8 north of Midpoint which appears to go through General Habitat Zone •The other routes south of Segment 8 near Castleford which go through Important and General Habitat Zones •The BLM preferred alternative (southern most route for Segment 8) which goes through or is adjacent to Important and General Habitat Zones •Segment 9E which goes through or is adjacent to Important and General Habitat Zones 	<p>The Idaho Governor's Task Force recommendations are addressed in FEIS section 3.11.1.3. The Governor's Alternative was finalized in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). A decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis. Segment 4 crosses approximately 4 miles of sage-grouse Preliminary Priority Habitat (PPH). However, this habitat is already crossed by three high-voltage transmission lines and moving the line north or south would result in greater impacts. Alternative 5B crosses approximately one mile of sage-grouse PPH on the east side of the southern Rockland Valley. This habitat was ranked as lower value habitat in the Landscape Importance Model. Segment 6 involves upgrading an existing line. Segment 7 impacts about one-tenth the PPH as the County's alternative (7K). In regard to Segment 8 of the Project, the BLM is continuing to work with stakeholders and is not issuing a decision on this route at this time.</p>
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	<p>Once routes with major impacts have been avoided, the BLM should require design features to ensure that any side effects or minor impacts are minimized through design features. With regard to activities with the potential to disturb sage-grouse, the Conservation Plan offers this recommendation:</p> <p>Apply seasonal-use restrictions (see Human Disturbance Section 4.3.5) on activities associated with the exploration, operations, and maintenance of mines, gravel pits, or landfills, including those associated with supporting infrastructure.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>When considering design features to minimize adverse effect to sage-grouse, the BLM needs to consider both the appropriate spatial scale for considering effects of proposed management activities on sage-grouse and their habitat as well as the adverse impacts of invasive exotic plant species, and the increased threat of wildfire.</p> <p>Knick and Hansen (2009) analyzed factors in lek persistence of over 5,000 leks. They used three radii to test for landscape disturbance</p>	<p>Impacts to sage-grouse are addressed in Section 3.11 of the FEIS and extensive mitigation measures are included to avoid, minimize, and mitigate impacts. Table 2.7-1 summarizes these measures and they are detailed in Appendix C. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. Mitigation measures were developed in consultation with state and local groups, including an interagency group consisting of the BLM, USFWS, IDFG, and WGFD that developed an analysis framework for assessing impacts to sage-grouse. Appendix J includes the framework and Habitat Equivalency Analysis (HEA) conducted to inform mitigation requirements. The FEIS includes measures to avoid introduction of invasive species and to remove them where avoidance is not successful.</p>

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			effects on lek persistence – radii of 3.1 miles, 11.2 miles, and 33.5 miles. Previous studies had shown behavioral effects on sage-grouse related to sagebrush disturbance at the 33.5 mile radius (Swenson et al. 1987, Leonard et al. 2000). Knick and Hansen’s study showed adverse effects on lek persistence from wildfire at the 33.5-mile radius. As such, the design features to minimize impacts should be based on both the quality of the habitat adjacent to the transmission line, the topography of that habitat, the impacts to that habitat and to sage-grouse, and the specific use of that habitat by sage-grouse (lekking, nesting and brood rearing, etc).	
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	<p>Where impacts have already been avoided and minimized, the Conservation Plan also recommends developing off-site mitigation for any remaining impacts: Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126 A key component of the Governor’s Sage-Grouse Conservation Plan is the use of a Mitigation Framework developed by the State Sage-Grouse Advisory Committee. This framework is based on the assumption that impacts will be first avoided, then minimized and finally mitigated. The mitigation framework requires the quantification of both direct and indirect impacts. The USFWS’s determined that transmission lines may cause a host of adverse indirect effects to sage-grouse, including increased predation, lower recruitment rates, habitat fragmentation, habitat degradation from invasive species, and impacts from electromagnetic fields. However, the Habitat Equivalency Analysis focused only on direct impacts when calculating the degree of mitigation needed. The BLM should utilize the phased decision approach to expand the analysis to include indirect effects when making mitigation calculations. If it would be helpful, we are available to describe the Mitigation Framework in more detail. The BLM should start by considering the indirect effects within a standard, conservative distance from the transmission line and adjust this distance depending on the quality of the habitat adjacent to the transmission line, the topography of that habitat, the impacts to that habitat and to sage-grouse, and the specific use of that habitat by sage-grouse (lekking, nesting and brood rearing, etc). The mitigation calculations need to factor in the success rate of vegetation restoration efforts, the rate of habitat loss due to wildfire, the lag time before any actual mitigation is realized. In our determination, fence marking/modification, as described in the Habitat Equivalency Analysis, is not an appropriate form of mitigation for indirect effects related to this project. The BLM should base its mitigation program on the recently released</p>	The FEIS includes off-site mitigation for direct effects based on the Habitat Equivalency Analysis (HEA) completed for the project. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The HEAs and associated mitigation measures were developed in consultation with state and local groups, including an interagency group consisting of the BLM, USFWS, IDFG, and WGFD, the agencies that developed the analysis framework for assessing impacts to sage-grouse.

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			Regional Mitigation Manual (see Instruction Memorandum No. 2013-142). The BLM has full authority to require mitigation for indirect effects to sage-grouse. Failure to do so would represent a notable lack of the regulatory mechanism needed to prevent the listing of this species. Depending on the nature and degree of these impacts, an offsite mitigation program could be available to direct funding from the project proponent to high-priority restoration areas. The Governor's Plan calls for restoration within Core Habitat Areas where the habitat has been degraded but can be restored. This mitigation program should not be available for projects within Core Habitat Zones where infrastructure should not be located (allowing for limited exceptions).	
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Portions of the project area also contain habitat that is crucial to sagebrush steppe obligate species such as sage-grouse, pygmy rabbits, sage thrasher, sage sparrow, and others. Such habitat has been severely fragmented and reduced through a variety of land management practices, including road construction and development of rights of way corridors. Big game may also be adversely affected by project development. As with sage-grouse, the BLM should minimize negative impacts by avoiding areas of critical habitat for species of concern, establishing siting criteria to minimize soil disturbance and erosion on steep slopes, utilizing visual resource management guidelines, avoiding significant historic and cultural resource sites, and mitigating conflicts with other uses of the public lands.	The FEIS discusses impacts to wildlife, including sagebrush steppe obligate species and big game, in Section 3.10 of the FEIS (and 3.11 for special status species). Extensive avoidance, minimization, and mitigation measures are included for the project across all affected resource areas. These measures are summarized in Table 2.7-1 and presented in detail in Appendix C. In the development of mitigation measures and selection of preferred alternatives the BLM as sought to avoid areas of critical habitat (Sections 3.10, 3.11), reduce soil disturbance and erosion on steep slopes (Section 3.15), avoid significant historic and cultural sites (Section 3.3), and mitigate conflicts with other uses of public lands (Section 3.17, Appendix C, Appendix F). The FEIS includes a detailed visual effects analysis following visual resource management guidelines (Section 3.2).
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Previous management activities have resulted in extensive road and right-of-way densities throughout our public lands. This density compromises the ability to support wildlife and fish by promoting further human disturbance, fragmenting habitat, accelerating sedimentation, spreading noxious weeds, and encouraging Off Road Vehicle use. Furthermore, there is a positive correlation between roads, even temporary ones, and human-caused wildfire ignitions. We recommend that the BLM evaluate the road and transmission network to avoid impacts to sage-grouse habitat where feasible, and close or decommission unneeded roads and corridors as part of the overall mitigation program.	The FEIS includes numerous mitigation measures related to avoiding, minimizing, and mitigating impacts related to roads. Please refer to Table 2.7-1, as well as Appendix C, for measures, including those to avoid impacts to sage-grouse habitat. Addition mitigation has been developed for indirect effects following the comment period for the FEIS.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	The devastating impacts of improper Off Highway Vehicles (OHVs) on terrestrial and aquatic ecosystems are well established. Improper OHV use degrades water quality, spreads noxious weeds, fragments habitat, disturbs wildlife, increases fires, and displaces non-motorized recreationists. The BLM needs to take additional steps to manage and monitor OHV use along transmission corridors.	Mitigation measures that address potential OHV or any unauthorized vehicle use of the ROW are summarized in Table 2.7-1.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	The most cost-effective way to deal with noxious weeds is to protect strongholds of native vegetation from activities which either spread noxious weeds directly or create suitable habitat by removing native	Invasive species and mitigation measures to prevent their spread are discussed in Section 3.8 of the FEIS and summarized in Table 2.7-1.

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			vegetation and disturbing the soil. BLM activities should limit road use and the exposure of mineral soils where weeds may become established. Roads, trails, and rivers serve as the primary routes for noxious weed species expansion. Special care should be taken to safeguard ecologically intact areas that are not currently infested.	
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	As stated in our previous comments, we believe that an integral part of conserving and recovering sage-grouse will be relying on guidance from local and national stakeholder groups. As such, we recommend that the BLM consult with national, state and regional conservation organizations that have expressed interest in this project. In addition, we recommend that the BLM coordinate with the US Fish and Wildlife Service, local Sage-grouse Working Groups, the Idaho Department of Fish and Game, and the Governor's Office of Species Conservation, and, of course, the project proponents.	The BLM has worked and will continue to work cooperatively with the USFWS, local sage-grouse working groups, IDFG, the Governor's office, and Project Proponents. See Chapter 5 of the FEIS for a summary of Project consultation and outreach.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	The FEIS describes a concern that, if a transmission line results in increased numbers of raptors in the NCA, then the increased predation could deplete the Piute ground squirrel prey population and result in a crash of the raptor population. While we appreciate the concern for the Piute ground squirrels, this scenario is not reflected in the literature for this area. In fact, the Idaho Department of Fish and Game has no limits or restrictions on hunting Piute ground squirrels within the NCA, except within areas of the NCA that have been closed for human safety reasons.	Noted. The State allows sage-grouse to be hunted also, the BLM must still analyze/discuss effects to these species.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	As mentioned in our group comments submitted by The Wilderness Society, the Idaho Conservation League and the Audubon Society, we believe that the BLM has failed to conduct the proper analysis on whether a transmission line is compatible with NCA legislation and meets the required enhancement provisions. As such, the Idaho Conservation League has significant concerns about all routes through the NCA. However, there are routes which are of extreme concern because of the significant damage to NCA resources. For example, route 9G would cross both the Snake River near Sinker Creek and Sinker Creek canyon. This route is entirely incompatible with both raptors and visual resources.	The BLM has decided to issue a phased decision approach, and will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project. This process will include developing compensatory mitigation for effects in the NCA.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Given changes in IRP projections, it is reasonable for the BLM to reexamine the need for two separate lines. Updated demand projections may show that a single line is sufficient.	As stated in Section 1.2 of the FEIS, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM has no expertise in analyzing the need for transmission lines and relies on DOE and FERC to evaluate the Proponents' objectives.

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101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	We also recommend a closer examination of the proposed separation between transmission lines. New recognition of the environmental impacts of transmission line corridors should be brought to the regulating body's attention to reconsider decreasing the separation distance between lines, particularly where resource conflicts are high.	The issue of separation distances between transmission lines is discussed in detail in Chapter 1 of the FEIS. The BLM has concluded that the minimum separation distances proposed by the Proponents are reasonable and consistent with regional conditions. During final design, the Proponents will evaluate where this distance can be decreased to avoid impacts to sensitive resources on a site-specific basis.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	However, there is a real concern that if a transmission line is constructed in sage-grouse habitat, increased numbers of raptors and corvids will adversely impact sage-grouse productivity. Sage-grouse have relatively lower reproductive rates than Piute ground squirrels and populations can be affected by artificially increased predator numbers. For example, the Idaho Department of Fish and Game has very strict bag limits in place for sage-grouse. The 2012 sage-grouse season was September 15-21 with a one-bird daily limit and two in possession. The Idaho Conservation League is not advocating any route through the NCA, but points out that if the BLM is going to use the argument that raptors may decrease Piute ground squirrel populations, the BLM must also apply this same logic within sage-grouse habitat where these concerns are in fact supported by the literature.	The BLM has decided to follow the phased decision approach, and will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project. The current decision only applies to BLM-managed lands in Segments 1 through 7 of the Project.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	<p>Pocatello RMP</p> <p>The current Pocatello RMP prohibits new transmission towers within 2 miles of occupied sage-grouse leks and an amendment is proposed that would waive this stipulation. Although the route through the Pocatello Resource Management Area attempts to minimize impacts by collocating the line with a preexisting project, these impacts still cannot fully be avoided. The BLM needs to craft the amendment such that any impacts to sage-grouse are also minimized through additional design features such as limits on the season and timing of construction activities and by developing a mitigation program to calculate and offset the impacts. The mitigation program needs to factor in high priority areas for restoration and conservation, the proper ratio of habitat improvements, the probability of success for restoration efforts, and the lag time before these habitat improvements are realized. We note that the Pocatello RMP is supposed to manage sage-grouse habitat consistent with the Conservation Plan for Greater Sage-grouse in Idaho. The Conservation Plan specifically recommends developing off-site mitigation for unavoidable impacts: Off-site mitigation should be employed to offset unavoidable alteration and losses of sage-grouse habitat. Off-site mitigation should focus on acquiring, restoring, or improving habitat within or adjacent to occupied habitats and ideally should be designed to complement local sage-grouse conservation priorities.</p> <p>-Conservation Plan for the Greater Sage-grouse in Idaho, p. 4-126</p> <p>Additional resources to be mitigated include other wildlife, winter range, bald eagle nests, sensitive areas and visual resources.</p>	Because the Proposed route follows an existing corridor with three other lines and because the analysis has shown that moving the route north or south would result in a larger impact to the sage-grouse resources, the BLM Pocatello FO has stated that the 2-mile lek restriction can be waived. A memo, signed by the manager, was submitted to the Administrative Record stating the above decision on September 5, 2012. The memo states that after conferring with the Idaho Department of Fish and Game, the Pocatello FO believes the Preferred Route should be used. It references Action LR-6.1.5 of the Pocatello RMP, which encourages use of existing corridors, and Action FW – 1.18, which states that “The Authorized Officer may waive or adjust these restrictions when conditions warrant” and proceeds to waive the 2-mile lek avoidance for three leks that Rocky Mountain Power was concerned about. The memo discusses the fact that the Preferred Route would parallel the existing powerlines. Because the alignment of the route has been planned to minimize impacts, and analysis has shown moving the route north or south would result in more adverse effects, this restriction has been waived and no amendment regarding sage-grouse leks would be required.

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101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Cassia RMP Amendments FEIS F.1-28 We oppose the amendment because the scenic values in the Goose Creek Travel Zone are not being adequately protected or offset. While it is difficult to mitigate for impaired visual resources, the BLM should consider expanding and strengthening protections for other areas within the Cassia area so that other incursions will not be allowed.	No amendment is proposed for the Cassia RMP for the BLM Preferred Route. Appendix F discusses amendments associated with alternative routes, however it states that no amendment is needed for the BLM Preferred Route in the area managed under the Cassia RMP.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	[Cassia RMP Amendments FEIS F.1-28] In addition, segments of the route through the BLM Burley Field Office are in an Important Bird Area for sage-grouse and the mitigation measures for such incursions are not adequately described.	No amendment is proposed for the Cassia RMP for the BLM Preferred Route.
101040	MICHELE CRIST, JOHN ROBISON	IDAHO CONSERVATION LEAGUE	Twin Falls MFP Amendments FEIS F. 1-31 Jarbidge RMP FEIS F.1-37 We oppose the Twin Falls MFP Amendments FEIS F.1-31 and the Jarbidge RMP, FEIS F.1-37 because of impacts to several sensitive environmental areas are not adequately avoided, minimized or mitigated. Specifically, the amendments would allow impacts to Salmon Falls Creek Canyon Area of Critical Environmental Concern (ACEC), eligible Wild and Scenic River, Outstanding Natural Area (ONA), Special Recreation Management Area (SRMA) and VRM direction without properly offsetting these impacts. Any amendments to these areas need additional strengthening to ensure that protections for these values will increase so there is no net loss in terms of protections. Options to consider include expanding these natural areas, increasing the level of protections within these natural areas and developing additional design features to minimize and mitigate for impacts.	The proposed amendments for Segments 8 and 9 of the Project are being deferred until the BLM makes a decision on those routes as part of a phased decision approach.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, THE WILDERNESS SOCIETY, NATIONAL AUDUBON SOCIETY, ROCKIES, WESTERN RESOURCE ADVOCATES	In a 2009 report prepared for the Department of Energy, [Footnote 1] titled "Sage-Grouse and Wind Energy: Biology, Habits, and Potential Effects from Development," the authors summarized that "Braun et al. (2002) reported that sage-grouse were particularly susceptible to the placement of overhead power lines at within 0.8 km (0.5 mi) of nesting grounds. Significant impacts to sage-grouse have been documented from overhead power transmission and communication distribution lines out to 6 km (3.7 mi) (Manville 2004)." In March 2010, the USFWS's 12-Month Findings for Petitions to List the Greater Sage-Grouse as Threatened or Endangered listed the following as potential impacts to the 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. In addition to the plethora of direct and indirect impacts, the FEIS notes that the "Project would contribute to the permanent loss of suitable sage-grouse habitat and possible disturbances to birds." FEIS at 4-73. Furthermore, the "cumulative effects of this Project combined with other reasonable foreseeable projects could be substantial (based on current trends in sage-grouse populations)." FEIS at 3.11-76. Given these predictions, we offer the following suggestions to minimize	The EIS recognizes that tall structures have been identified as a factor, along with other factors such as fire. The Preferred Route is consistent with the Wyoming sage-grouse policy and avoids preliminary priority habitat (PPH) in Idaho for sage-grouse to the extent practicable. Mitigation is provided for the direct effects in the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The fact that the BLM has an exception process does not mean that exceptions will be granted. In fact, the process, which requires agreement by multiple agencies and on-site inspectors, makes it more likely that a mitigation measure will be enforced. There is no exception process for NFS lands; all closure periods will be adhered to. TESWL-6 comes directly from IDIB2010-039a1. Proximity in this context refers to a situation where a sharp-tailed grouse lek is within the 4-mile buffer around a sage-grouse lek.

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			<p>impacts.</p> <p>a. Protective Stipulations</p> <p>Surface disturbance is anticipated to have adverse impacts to sagebrush habitats including temporary and permanent loss of habitats across all alternatives. Fragmentation and degradation of habitat for greater sage-grouse also is anticipated from surface-disturbing activities and associated development. Therefore, protective stipulations within the project area deserve careful attention. The FEIS notes that recent research identified the best predictors between extirpated and occupied ranges to include distance to transmission lines (Wisdom et al 2011). FEIS at 3.11-74. Knick et al. 2013 further emphasizes intolerance of grouse to human disturbance and development, reporting that 99% of active leks in the species' western range were in landscapes with <3% disturbance. Doherty (2008) reported that "impacts to leks caused by energy development would be most severe near the lek. Although most of the impacts from energy development are indirect, some direct effects, such as flying into overhead power lines would also result from energy development and ROWs."</p> <p>Collectively, our organizations continue to stress that that science strongly argues that the spatial restrictions proposed in the FEIS are severely inadequate. The 0.25 mile (TESWL-9) and 0.60 restrictions (TESWL-8) have long been recognized as being without scientific merit and an inadequate protective measure to maintain lek activity (Holloran 2005, Walker et al. 2007). Instead, given the research from oil and gas development, the agency should avoid placing transmission lines within 5 miles of sage-grouse leks, which is also recommended by the USFWS². The Lander RMP DEIS and FEIS both recognized this, as did the Miles City RMP. As noted in the latter, "BLM NSO stipulations for leasing and development within 0.25 miles of a lek would result in an estimated lek persistence (the ability of leks to remain on the landscape) of approximately 5 percent, while lek persistence in areas without oil and gas development would be expected to average approximately 85 percent. Impacts from energy development occur at distances between 3 and 4 miles."</p> <p>"Impacts to leks caused by energy development would be most severe near the lek. Although most of the impacts from energy development are indirect, some direct effects, such as flying into overhead power lines would also result from energy development and ROWs. Miles City DEIS/RMP at 4-135.</p> <p>TESWL-8 should be amended to include "undetermined" Greater Sage-grouse leks, as was done for TESWL-9. FEIS at 2-166. As pressures increase on the landscape, managers must provide greater opportunities for lek survival and conservation success. This conservative approach takes into account observer error (failure to identify strutting grouse), weather conditions, and grouse variability.</p> <p>We applaud the BLM for changing the timing stipulations in the DEIS (originally March 1 to May 15) to March 1 to July 15, as we originally</p>	

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			<p>requested within our DEIS comments. This extension provides greater protections to hens and young as most hens are still sitting on nests in May 15. In fact, peak hatch generally occurs in early June and is followed by early brood rearing, which also occurs near nesting habitat. The timing stipulation, from March 1 to July 15 should apply to the entire core area in Wyoming and for those portions of transmission line that run through Key Habitat areas in Idaho, whereas it is currently proposed that this only applies to “Federal Land and all land in Wyoming and Idaho Segments 6,8, and 9”. FEIS at 2-166.</p> <p>In addition, we applaud the extension of the protective stipulations into the operations and maintenance periods and would like to make sure that this applies to all stipulations related to grouse. Table 2.7-1 at 2-166. Lander RMP FEIS notes that “wildlife seasonal protections from surface-disturbing and disruptive activities apply to maintenance and operations actions when the activity is determined to be detrimental to wildlife.” FEIS at 117. This is an important timing due to the longer period of time associated with maintenance and operations actions, beyond the usual development-specific stipulations. BLM supports this in the Lander RMP FEIS, “Beyond initial exploration (including geophysical activities), land clearing, and aboveground facility construction, continued human disturbance to special status wildlife could occur from activities such as equipment maintenance and site operations, which are especially disruptive during sensitive times (wintering, breeding, and nesting).” FEIS at 931. The Miles City Draft RMP noted that in areas where development occurred, “there would be no restrictions to operation and maintenance activities, which would potentially result in the reduction or extirpation of populations.” DEIS at 4-134 (emphasis added).</p> <p>The current protections proposed for adoption uses NSO stipulations as a means of protection for grouse, most notably in Core Areas. FEIS at 2-166. However, NSOs are subject to exceptions, waivers and modifications. If these can be applied to NSOs, this fails to meet the regulatory certainty being sought by USFWS, which is extremely concerning given the importance of this habitat to grouse persistence in the planning area. If waivers, exemptions and modification are allowed then the BLM should set up a process that allows the public to comment when these actions are considered.</p> <p>TESWL-6, related to Sharp-tailed Grouse, needs to be clarified. This EPM proposes that “in areas where sharp-tailed grouse leks occur in proximity to greater sage-grouse leks, surface disturbance will be avoided within 4 miles of occupied or undetermined greater sage grouse leks ...” FEIS at 2-165. The term “proximity” should be removed and replaced with a specified distance.</p>	

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101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	The Gateway West FEIS fails to adequately address noise impacts. Facilities that produce continual noise can affect the breeding vocalizations of greater sage-grouse. Continuous noise from industrial facilities, such high voltage transmission lines and substations, close to active greater sage-grouse leks would interfere with male greater sage-grouse strutting behavior which could reduce the reproductive success of greater sage-grouse using these leks. The BLM does note in the FEIS, "construction-related noise and dust disturbance would occur during construction, which could potentially make habitat within the immediate vicinity of the activity temporally unsuitable for this species." FEIS at 3.11-65. We strongly recommend that BLM carefully review and incorporate new research which relates to noise impacts on grouse, as these are suggesting threats to sage-grouse population viability – through abundance, stress levels, and behavior (Blickley et al. 2012, Blickly and Patricelli 2012). In the recently released Miles City Draft RMP, BLM recognizes the impacts of noise, "Movements associated with oil and gas wells, noise associated with disruptive activities and compressor stations, vehicle use, and human presence would impact numerous wildlife species indirectly, including sage grouse. Sage-grouse numbers on leks within approximately 1 mile of compressor stations would contain lower numbers than leks greater than 1 mile from compressors. Male attendance at leks would be expected to be reduced when subjected to the current standard noise limitation of 50 decibels at the lek site." Miles City DEIS/RMP at 4-135.	Noise is analyzed (for both fair and foul weather) in Section 3.21, Figures 3.21-7 and -8, of the FEIS. Noise from 500 kV lines can travel hundreds of feet, especially in foul weather. Even in foul weather, audible noise levels beyond the edge of the ROW would be less than the level of normal conversation. (see Section 3.21).
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Furthermore, the new Environmental Protection Measure proposed in Table 2.7-1 related to surface disturbance should incorporate noise impacts. TESWL-9 states that "this distance (i.e. 4 miles) may be reduced on a case-by-case basis by the applicable agency, if site conditions would allow the Project to be located closer the lek than 4 miles (e.g. topography prevents the Project from being visible from the lek, or a major disturbance such as a freeway or existing transmission lines is located between the Project and the lek)." FEIS at 2-166. While topography may shield the view of the transmission line from the lek, noise may be carried to the lek site and interfere with strutting behavior and reproductive outcomes.	Elevated noise would dissipate well before 4 miles from the lines. Even in foul weather, audible noise levels beyond the edge of the ROW would be less than the level of normal conversation. (see Section 3.21 of the FEIS). In fair weather, levels would be below the those found in a library at the edge of the ROW.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Upon designation of special status species, the species' distribution, key habitat areas, and special management needs should be identified prior to developing resource management plans. While winter concentration areas were referenced in the document (FEIS 2-166) with protective measures, TESWL-10: "If Winter Concentration Areas for the greater sage-grouse are designated, there will be no surface occupancy within the designated areas from November 1 through March 15", it is unclear the location of extent of winter range/concentration areas. In addition, to this proposed Environmental Protection Measure, we propose the BLM to add "unless data indicate a date modification is necessary to	We appreciate your recommendation that the Wildlife Society report could be useful for future efforts. Regarding Winter Concentration Areas, this issue is discussed in Section 3.11 of the FEIS. The FEIS notes that no areas that have been officially designated as sage-grouse "Winter Concentration Areas" are known to occur within land crossed by the Project. The measure TESWL-10 requires that such areas must be avoided if and when they become designated. Idaho and Wyoming have slightly different terms for "Winter Concentration Area"; therefore, the term refers to any area officially designated by a state or federal

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			<p>better protect wintering greater sage-grouse.”</p> <p>In addition to more carefully assessing the spatial distribution/acreage of current winter habitat for sage grouse, the BLM should also consider the current quality of this habitat as this will likely drive selection of appropriate protective measures and prioritize restoration activities. The Governor-appointed Wyoming Sage-grouse Implementation Team recently commissioned the Wyoming Chapter of the Wildlife Society, a non-profit organization of wildlife biologists, to review current protocol for identifying and mapping sage-grouse winter concentration areas. This report would be helpful for consideration in BLM’s efforts going forward. [Footnote 3] The protocol proposed within this report may be helpful to the BLM when developing a defensible protocol for identifying and mapping sage-grouse winter concentration areas. Because of the importance of this habitat to grouse, we suggest protection for these areas based on what has been presented in the Lander FEIS/RMP (Record # 3006): “In identified greater sage-grouse winter range, vegetation treatments should emphasize strategically reducing wildfire risk around or in the winter range and maintaining winter range habitat quality.”</p>	agency as crucial to the survival of sage-grouse during the winter.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	<p>Fencing can be an obstacle or potential hazard to special status wildlife species by concentrating livestock, adversely impacting vegetation and fragmenting habitat. In relation to sage-grouse, the addition of new fences further fragments the landscape, provides potential collision points, and provides perching opportunities for raptors – all detrimental to sage-grouse. In addition to fence surveys in the Lander and Rock Springs Wyoming BLM Field Office areas showing that Greater Sage-grouse can be injured or killed as a result of flying into fence wires (Lander RMP FEIS at 969), a Utah study found that 18% of sage-grouse deaths were due to fence collisions (Danvir 2002). A 2009 WGFD report examined sage-grouse mortalities near Farson and found that sage-grouse fence diverters reduced sage-grouse fatalities by 61 percent (Christiansen 2009).</p> <p>While transmission lines are not generally associated with fences, construction of large vertical structures will likely result in behavioral changes by grouse. Therefore, BLM should require monitoring of fences in the areas adjacent to the line to determine locations where collisions are occurring. We suggest that the proponent remove or mark identified wildlife hazard fences that are adversely affecting wildlife where opportunities exist. This option was provided in the Miles City RMP, “Fences in high-risk areas (based on proximity to leks, lek size, and topography) would be removed, modified, or marked to reduce outright sage-grouse strikes and mortality.” DEIS at 2-49.</p>	Impacts to vegetation are addressed in Section 3.6 of the FEIS, and habitat fragmentation is discussed in sections 3.10 and 3.11. Removing and or marking fences were considered as mitigation in the HEA. These activities were ranked lower than easements for conservation of habitat and sagebrush restoration and enhancement. Refer to Appendix C-3 of the FEIS.

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101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	The BLM's objective for managing riparian and wetland habitats should be to maintain, restore, or improve riparian areas to achieve a healthy and productive ecological condition that provides benefits and values within site capability. Wetland and riparian areas are unique and among the most productive and important ecosystems. Although comprising only a small percentage of the BLM lands, they affect most other resources and values. Given the high value of these areas for a variety of resources, all aspects of riparian and wetland area inventory, monitoring, and management will involve a multidisciplinary effort. The impacts of a high voltage transmission line traversing the landscape should be considered and appropriately managed.	Wetland and riparian areas were avoided to the extent feasible in the selection of preferred routes. Impacts to wetland and riparian areas are assessed in Section 3.9 of the FEIS. Mitigation measures, including compensatory mitigation required by the U.S. Army Corps of Engineers, for these impacts are included in the FEIS (see Table 2.7-1 and Appendix C-2).
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Riparian-wetland areas are a component of brood-rearing habitat for greater sage-grouse because they provide needed forbs and insects necessary for chick survival. Actions that improve riparian-wetlands improve habitats for special status wildlife species, especially increasing the quantity and quality of riparian-wetland vegetation and insects, are critical for sage-grouse. Therefore, we encourage the following as riparian/wetland habitat was inadequately addressed in TESWL-14 (FEIS at 2-167). We propose strengthening a portion of it: Surface disturbing and disruptive activities should be prohibited within 1,329 feet (0.25 mile) of playas and 100-year floodplains where mapped. The proposed EPM currently only specifies the avoidance of the actual identified 100-year floodplain. Where unavoidable, the "crossing-specific plans" should include specific language that addresses the avoidance of introducing or expanding invasive nonnative species. Treatment to address INN species is expensive and with uncertain success at best. It involves highly disruptive management with potential for adverse impacts to greater sage-grouse. With limited budgets available for pest treatments, we encourage the BLM to emphasize reducing the likelihood of spread through management actions such as requiring washing of vehicles and limited surface disturbance. This latter suggestion applies to the entire planning area, not just riparian areas.	Impacts to sage-grouse are addressed in Section 3.11 of the FEIS and extensive mitigation measures are included to avoid, minimize, and mitigate impacts. Mitigation measures were developed in consultation an interagency group consisting of the BLM, USFWS, IDFG, and WGFD. Prohibiting disturbing and disrupting activities within a quarter mile all 100-year floodplains would not be feasible, especially in the Bear River Valley. Towers would need to be more than one-half mile apart even on the smallest streams, in many cases they would need to be many miles apart.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Guy wires, such as those on meteorological (met) towers, have been known to cause more bird fatalities. For example, at Foote Creek Rim in Wyoming, researchers found an estimated 8.1 bird fatalities per met tower per year. Given these findings and others, the U.S. Fish and Wildlife Service (USFWS) recommends that all existing guy wires be marked with recommended bird deterrent devices (USFWS 2003) [Footnote 4] recommendations for using bird diverters to prevent avian collisions and remain in compliance with the Migratory Bird Treaty Act (16 U.S.C. 703-712), bird diverters should be more commonly used met towers. The USFWS recommends that all existing guy wires be marked with recommended bird deterrent devices so as to remain in compliance with the Migratory Bird Treaty Act (16 U.S.C. 703-712). Although the	Environmental protection measures WILD-6 and WILD-7 discuss the use and application of bird deterrent devices, including flight diverters (Table 2.7-1 of the FEIS).

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			use of bird deterrent devices has been particularly important in raptor and waterfowl concentration areas, such devices also are useful in preventing songbird and perhaps even sage-grouse collisions with guy wires. We applaud proposed EPM TESWL-11, which states “No structures that require guy wires will be used in occupied sagebrush obligate habitats within the area managed under the Kemmerer RMP.” FEIS at 2-166. However, we stress that bird diverters should be attached to the new transmission line in areas near sage-grouse concentration areas – such as leks and winter concentration areas.	
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	As noted within the FEIS, “studies conducted on species that have similar life history traits to sage-grouse (e.g., the lesser and greater prairie-chickens) have shown that use of habitat is reduced when these habitats are located near tall structures (Pitman et al. 2005; Pruett et al. 2008).” FEIS at 3.11-74. The BLM continues, “...if sage-grouse have similar responses to disturbances as the lesser and greater prairie-chickens, it is possible that the vegetative clearing for the permanent access roads would not result in habitat fragmentation for sage-grouse, but that the presence of the transmission structures and line would serve as a form of habitat fragmentation, and may inhibit movement to some degree.” Ibid. Given that peer reviewed science that demonstrates avoidance or non-avoidance of tall structures by grouse is limited, we encourage a research project to be associated with this high voltage transmission line. Research protocols should follow those outlined in Utah Wildlife in Need’s 2011 report: Protocol for Investigating the Effects of Tall Structures on Sage-grouse within Designated and Proposed Energy Corridors. [Footnote 5]	Your suggestion is noted. The BLM will continue to work with the Proponents to ensure sufficient monitoring of impacts during construction and operation of the project.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	“Given the extent of the direct and indirect impact on greater sage-grouse and their habitat, as well as the lack of a compensatory mitigation plan that is currently acceptable to both the Proponents and the state and federal agencies, the Project’s construction and operations may impact individuals or habitat, and is likely to contribute to a trend toward federal listing or loss of viability for the greater sage-grouse (R4 language). For the same reasons, the Project may adversely impact individuals and is likely to result in a loss of viability in the Planning Area, or cause a trend towards federal listing (R2 language).” DEIS 3-11.72 We respectfully request a tallied summary of the changes that have been employed since the DEIS that has resulted in the BLM’s FEIS position of minimal impacts.	Changes between the draft and final EIS are summarized in Chapter 1 of the FEIS. Section 3.11 provides the updated analysis of impacts to sage-grouse, including discussion of additional mitigation and analysis provided by the Proponents since the DEIS. Also see Appendices C and J of the FEIS. The FEIS does not conclude that impacts would be “minimal”. The conclusion discloses impacts to sage-grouse, but concludes that the Project’s effects are not likely to contribute to a trend toward federal listing or cause a loss of viability. However, the FEIS also discusses cumulative effects (Chapter 4), which could be substantial. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Numerous Resource Management Plans are currently in the process of being revised and amended, most notably to address inadequate regulatory mechanisms currently in place for Greater Sage-grouse. Clarification is requested on how the decisions made within these important land use documents will impact the proposed Gateway West project, including procedure for incorporating information from RMPs that are completed post approval of the ROW grant.	Until the pending revisions or amendments are finalized, we cannot evaluate what impact the changes may or may not have on the Gateway West Project.

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101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Protective Stipulations Raptors are sensitive to environmental disturbance and occupy an ecological position at the top of the food chain; thus, they act as biological indicators of environmental quality. The nesting season is considered the most critical period in the raptor life-cycle because it determines population productivity, short-term diversity, and long-term trends. Therefore serious attention should be paid to the raptor buffers as all raptors are protected under the Migratory Bird Treaty Act. Raptor nest protective buffers (surface-disturbing and disruptive activities subject to seasonal limitations) proposed are inadequate. Any activity that disrupts breeding, feeding, sheltering, and roosting behavior and causes, or is likely to cause, nest abandonment or reduced productivity is considered disturbance and is a violation of BGEPA. We encourage the BLM to adopt the following protections - prohibiting surface-disturbing activities within 1 mile of GOEA nests and 1 mile for Ferruginous Hawk nests. Our organizations support the specificity of “nests active within the past 7 years” and the inclusion of winter roost sites. We recommend 1 mile buffer for all other raptors nests as well (BLM Special Status Raptors – Burrowing Owl, Swainson’s Hawk, Peregrine Falcon, and Northern Goshawk). The USFWS (USFWS 2002a) identifies courtship, nest construction, incubation, and early brooding as higher risk periods in the life-cycles of raptors when adults are more prone to abandon nests due to disturbance. The USFWS (USFWS 2002a) also indicates that human activities resulting in disturbance to raptors can cause population declines. Therefore, seasonal restrictions and buffers around nest sites are intended to minimize disturbance to GOEA. We recommend that year-round exclusion areas also be considered for use, if circumstances require.	Mitigation plans are included in Appendix C of the FEIS. Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The FEIS disclosed that, even with the proposed mitigation, there would still be adverse impacts. The extensive mitigation measures were developed through an inclusive process that drew on policy and scientific experts with significant input from stakeholders during the DEIS and FEIS processes. The Forest Service and BLM, based on the best available science, are using one-mile buffers around the nests of all raptor species to minimize direct and indirect effects. Timing restrictions in federal land management plans for activities near active raptor nests would be adhered to.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Golden eagles (GOEA) are protected under two major forms of federal legislation, the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA), and under increasing federal scrutiny with uncertain population levels. Based on the USFWS’ analysis of populations across the nation, there is no safe allowable take level for GOEA; however, take is likely unavoidable with transmission project of this magnitude and in this location. Use by GOEA is not surprising as the application area contains native shrubland and grassland communities, as well as natural landscape features, that provide foraging and nesting opportunities sought by this species. In reviewing and commenting on the Gateway West DEIS, our organizations recommended that the BLM develop a supplemental GOEA document for public review and comment. While this was done for Greater Sage-grouse, this was not completed for GOEA and this remains a request of our groups. Given the growing concern for these majestic birds, especially related to mortalities associated with wind farms and expanding transmission infrastructure, any development decisions that	The FEIS includes a thorough analysis of effects to golden eagles, including cumulative effects, and complies with all protective laws and policies. See Sections 3.10 and 3.11, as well as Chapter 4, of the FEIS. The BLM did not find that a supplemental document was necessary to evaluate the proposed project.

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			will impact GOEA must be placed within a regional population context much larger than the area immediately surrounding any proposed transmission project, which this FEIS fails to do. In addition, areas out 10 miles from the application area should be evaluated. Adequate buffers for GOEA should be in place and monitored to evaluate effectiveness. Compensatory mitigation for retrofitting of lethal power poles in the region should be considered for the first five years of operation.	
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Commissary Ridge is a well-documented major raptor migration route, where Golden Eagles were among the five most common species observed, with close to 300 GOEA and over 3,000 raptors passing 8 through this distinct area each fall (DEIS p. 3.10-16). Unfortunately, the FEIS fails to determine a collision risk associated with the proposed line crossing the ridge perpendicular to this migration pathway. As noted in the FEIS (3.11-72): "There is potential risk of avian collisions with transmission lines or other Project-related structures due to the Project's construction and operations, which could result in elevated mortality rates for some avian species ... Collisions usually occur near water, migration corridors and occur more often during inclement weather." The FEIS further states (3.10.2.2-53): "Bird collisions with structures occur more often along migration routes, for example at Commissary Ridge. The Proposed Route would run perpendicular to the ridge, so most birds traveling along it would be likely to encounter the transmission line (see Figure A-5 in Appendix A)." Emphasis added. In Table 2.7-1 of the FEIS, WILD-7 states "Flight diverters will be installed and maintained where the transmission line crosses rivers at the locations identified in Table 3.10-4. Additional locations may be identified by the Agencies or the Project Proponents. The flight diverters will be installed as directed in the Proponents' approved Avian Protection Plans and in conformance with the Migratory Bird Treaty Act (MBTA) and Bald and Golden Eagle Protection Act (Eagle Act) as recommended in the current collision manual of APLIC." Emphasis added. Given the above information, we feel strongly that bird diverters should be installed and maintained at migration corridor known as Commissary Ridge.	The FEIS discloses the risk of collision with the transmission line along Commissary Ridge (FEIS Section 3.10). Environmental protection measures WILD-6 and WILD-7 discuss the use and application of bird deterrent devices at locations identified by the agencies (Table 2.7-1 of the FEIS).
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	FEIS at 3.11-24 states that the proponent can address the direct loss of birds: "The framework states that there are two ways that a project proponent can deal with the issue of "direct loss of birds": a) work closely with the USFWS and state agency biologists to develop an approach to address loss of birds from project-related impacts and their replacement, and b) contribute financially to research projects that have been designed specifically to address this issue." While research may not directly address the direct loss of birds at the Commissary Ridge location, this site may prove very valuable to pursue as a research project to understand the impacts of transmission at a major migratory pathway and thus minimize losses in other locations.	Your suggestion is noted. The BLM will continue to work with the Proponents to ensure sufficient monitoring of impacts during construction and operation of the Project.

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101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Additionally, the National Audubon Society has identified an Important Bird Area (IBA) just north of the proposed route and west of Rawlins – Shamrock Hills Raptor Concentration Area. This is a global IBA that is located in the greatest concentration of raptor nests documented amongst the Wyoming routes. These nests identify preferred habitat for raptors, as these contain quality combinations of nesting and foraging habitats that should be protected for use by future nesting raptors. As noted in the FEIS (3.10.1.5-17), global IBAs reflect the area's highest conservation value. While this IBA is not located directly within the project area, given the concentration of raptors and the distances they travel to hunt, conflicts may occur. Therefore, BLM should improve efforts to avoid, minimize and off-set impacts to raptors, including through a comprehensive monitoring and adaptive management strategy.	Measures to avoid, minimize, and mitigate impacts to raptors are included in Table 2.7-1 and Appendix C. Impacts to IBAs are assessed in Section 3.10 of the FEIS. We note that many of the existing towers in the Rawlins FO have been used by raptors for roosts and nests. The FEIS identifies the IBAs crossed by the Project in Section 3.10. The Shamrock Hills IBA lies north of I-80. The Preferred Route is south of this road.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Our organizations remain very concerned about the potential for additional renewable development within the Shirley Basin, a dramatic landscape which harbors some of the world's last intact grasslands and a mix of Wyoming big sage communities. This area supports superb fisheries, significant bat roosts, and numerous bird species, including mountain plover, ferruginous hawks, sage grouse and the American white pelican. The Nature Conservancy scientists have identified the Shirley Basin as an area of high biological significance because of its intact grasslands and aquatic habitats. Furthermore, the National Audubon Society has identified an Important Bird Area (IBA) in the basin. We would support this segment only if (1) the Heward substation were eliminated, which failed to be addressed in the FEIS and there are (2) assurances that public lands north of the checkerboard will not be available to new renewable energy development activities, as this important basin has already experienced considerable strain due to recent development pressures. Our additional concerns with this route include: Question the need to build a new 230 kV line and reconstruct the existing 230 kV line instead of reconstructing the existing 230 kV line as a 500 kV line and avoiding the need to build a new line in a new ROW, Portions of Alts 1W(a) and 1W(c) follow West-wide Energy Corridor (WWEC) segment 78-255 which was identified as a "corridor of concern" in the 2012 settlement agreement for The Wilderness Society, et al. v. United States Department of the Interior, et al. (see Attachment 1). Under the settlement agreement, the federal agencies are required to re-evaluate the corridors to better avoid impacts to natural and cultural resources and help facilitate renewable energy development. WWEC segment 78-255 was identified as a corridor of concern because of impacts to sage-grouse core area and habitat (see Attachment 1).	Where feasible, the Gateway West route and alternatives follow existing transmission lines; many of these are also in the WWE corridor. The EIS identifies the routes that are within or adjacent to a WWE corridor. Segment 1W follows an existing transmission line and is also within a WWE corridor on federal land. This route is part of the Wyoming Governor's sage-grouse corridor network. A driving force in establishing the Governor's corridors was the need to concentrate development, rather than create new disturbance across the landscape. Therefore, these corridors follow existing lines. In order to be consistent with the Governor's sage-grouse policy, the new line must be with the Governor's corridor in sage-grouse core habitat. This will be the case regardless of whether this is a WWE corridor or not; therefore, any change to WWE corridor would not change the location of Segment 1W. The environmental effects associated with all routes are fully analyzed in this EIS. The BLM is complying with the settlement agreement.

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101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	Alts 1W(a) and 1W(c) are not in a Wyoming Executive Order specified Transmission Corridor	The State of Wyoming found that Segments 1W(a) and 1W(c) are consistent with EO 2011-5 because both the new transmission line and the reconstruction of the existing line could be constructed within 0.5 mile of an existing transmission line through sage-grouse core area. See Section 2.4.1.3 for the state's preferred alternatives.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	<p>The federal mitigation hierarchy should be specified, as is being increasingly done with RMP revisions and amendments. Mitigation is often popularly believed to be limited to compensatory, however this should be preceded by all good faith efforts to avoid or minimize impacts.</p> <p>The sequence of mitigation actions will be as described below in three steps –</p> <p>Avoid: adverse impacts to resources are to be avoided and no action shall be permitted if there is a practicable alternative with less adverse impacts. Minimize: if impacts to resources cannot be avoided, appropriate and practicable steps to minimize adverse impacts must be taken.</p> <p>Compensate: appropriate and practicable compensatory mitigation is required for unavoidable adverse impacts that remain. The amount and quality of compensatory mitigation may not substitute for avoiding and minimizing impacts.” Earlier this month, the BLM has issued a new interim policy on regional mitigation, effective immediately (http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2013.Par.57631.File.dat/IM2013-142_att1.pdf). The new manual covers regional mitigation strategies, planning, and implementation. In the planning portion, the goal is to incorporate sites and measures and mitigation strategies into land use plans, including a regional baseline, mitigation objectives, land use allocations or “areas for landscape-level conservation and management actions.” Relevant to the Gateway West FEIS, ACECs and sage-grouse priority habitat are used as examples of these. In the implementation portion, this is described as part of approving specific land uses, which may be “within (onsite) or outside of the area of impact.” The manual emphasizes that on-site mitigation is always the first choice (including a “mitigation priority order”, then discusses off-site mitigation comprising replacing or providing similar or substitute resources or values through “restoration, enhancement, creation, or preservation.” As the EIS process proceeds, we respectfully requests clarification on how this new interim regional policy on mitigation will be incorporated. Mitigation, which should be monitored to determine effectiveness, should enhance long-term health and viability of the impacted populations through permanent protections and through other protections that last at least throughout the life of the project. Location of off-site mitigation is extremely important. In the DEIS our</p>	The BLM's priority is to avoid and minimize impacts to the greatest extent feasible. This approach has been followed in the development of the measures included in Table 2.7-1 and Appendix C. The BLM IM 2013-142 was issued after the publication of the FEIS. The updated mitigation measures from the Proponents submitted in response to FEIS comments take this draft policy into account. The project included an HEA to determine impacts and mitigation for direct effects (see Appendix C-3 of the FEIS). Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds. The various mitigation methods are listed by priority in Appendix C-3 of the FEIS. The BLM will continue to work with the Proponents to ensure actions are in compliance with all applicable laws and policies during project implementation. In addition, mitigation has been offered for impacts to the SRBOP NCA, the BLM will continue to work with the Proponents to develop these measures.

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			<p>organizations requested “Full range of off-site mitigation strategies to improve conditions for wildlife and habitat, in addition to avoidance and on-site mitigation.” While this has been done to a fair degree for Greater Sage-grouse, this has been done inadequately for other species, most notably Golden Eagles.</p> <p>In DEIS, our organizations requested “Avoid to the greatest extent possible by siting in areas with low resource values and minimized and mitigated to the best degree possible, using best management practices, the best available technology, and innovative strategies for both on and off-site mitigation in proposed action.” While we draw attention to the recommendations already made (i.e. use of bird diverters in migration corridors), BLM should be commended for collocating lines, using singular lattice towers where able, and requiring guy wired to be marked.</p> <p>According to the FEIS, “to properly determine the extent of necessary mitigation, one must first determine how project-related impacts to habitats would affect the services that those habitats once provided.” FEIS at 3.11-25. While it should be the goal to achieve no net loss of habitat for wildlife, we appreciate the recognition of the challenges of such in this arid landscape. “However, revegetation in arid landscapes can take many years to reestablish to pre-disturbance conditions or to levels that are suitable for sage-grouse, especially in terms of mature sagebrush canopy cover. Therefore, revegetated shrublands would still have lower shrub cover than undisturbed areas for many decades. In addition, even if revegetation efforts within the ROW are successful, they are unlikely to provide habitat of the same quality or suitability as before construction, due to the presence of the new transmission facility nearby (consequently there may be a need for additional mitigation activities elsewhere; see Appendix C-3).” FEIS at 3.11.2.2-69. For this reason, avoidance of critical habitat and minimizing disturbances should occur before compensatory mitigation. This project comes at a critical time for the conservation of greater sage-grouse. This “warranted but precluded” candidate species requires management and protection focused on ensuring local conservation success, in conjunction with an overall strategy to incorporate indirect and cumulative effects and to provide for rangewide persistence for the species. The adoption of objective methods based on the most complete and current science is the key component of such a strategy. We are optimistic that further refinement of HEA for sage-grouse can lead to sound development with lasting conservation benefits.</p> <p>Finally, given the reliance on mitigation, our organizations strongly encourage an analysis of effectiveness of mitigation measures, including monitoring and adaptive management. Thresholds and adaptive management actions were not clear for any of the species highlighted within the FEIS.</p>	

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101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	In our DEIS comments, we requested that the Avian Protection Plan and Habitat Equivalency Analysis be presented in a supplemental release of information, with the data, methods, and results made available for public comments. The HEA has been and we are appreciative of this innovative approach being pursued by the BLM. However, the APPs were developed by the Proponents and are only accessible on their respective websites. We request clarification on opportunities for public comment and engagement on the content of the APPs. Of the portions were able to review, most notably that developed by Idaho Power, we were pleased to see the following measures (many of which we recommended in DEIS comments) incorporated: Anti-perching devices Conductor to conductor spacing to prevent electrocution (following updated APLIC) Marking lines to prevent collisions Adapting arrangement of distribution lines if electrocution does start to occur (request clarification on how they will monitor) Modification to lighting Use of GIS to identify GOEA areas of highest risk (request clarification on selected eagle risk factors) We do note that spatial buffers for GOEA nests, as with Bald Eagles, should be 1.0 miles.	As the comment states, the Proponents' Avian Protection Plans were available on the Proponents' Web sites.
101041	ALEX DAUE, DALY EDMUNDS, GARY GRAHAM, ERIN LIEBERMAN	IDAHO DEFENDERS OF WILDLIFE, et al. (see preceding)	CANDIDATE CONSERVATION AGREEMENT (CCA)/CANDIDATE CONSERVATION AGREEMENT WITH ASSURANCES (CCAA) As with APPs, we request clarification on opportunities for public comment and engagement on the content of the CCAs/CCAAs.	It is not clear which Candidate Conservation Agreement (CCA) is being referred to. For example, there are two CCAs for slickspot peppergrass, one from 2003 and one from 2006. These are not new documents subject to a public comment period.
101042	JAMES AND MARYANN SLEGGERS	SUNDANCE DAIRY	As a private land owner I strongly urge you to keep the powerlines off of and far away from privately owned land. Idaho Power needs to pay up and put the lines through the Morley Nelson Birds of Prey defend area!! !MAKE THE RIGHT CHOICE!	Your preference is noted. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101043	MICHAEL T MORTELL		BLM's Preferred Alternative will adversely effect the most private citizens of all in segment 8, map 93 of 121.	This comment is noted.
101044	JEANETTE & JACOB CROSSLEY		4. My view of the beautiful Owyhee mountains would be ruined. 5. My property value would go down.	Your opposition is noted. Effects to scenery is discussed in section 3.2 and effects to property values are discussed in Section 3.4 of the FEIS. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101045	RONALD & ROSA ROGERS		I've lived in Nampa for almost 70 years and I don't see how this would impact the Bird of Prey Area.	This comment is noted. Please refer to the analysis in Section 3.10 of the FEIS regarding the SRBOP. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.

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101046	LOUIS & DEANNA SANCHEZ		BLM land belongs to the taxpayer of the U.S. and we as tax-payers have the right to determine where this transmission line should be located. Private land is NOT where this lines should be located for obvious reasons. Special interest groups should not dectate the final outcome.	This comment is noted. The NCA belongs to all citizens of the U.S. and is managed as required by a law enacted by Congress. The BLM has led a cooperative effort taking input from all affected parties into consideration. It is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101047	DUANE YAMAMOTO		I strongly remain objected to the BLM preference route 8B	Your opposition is noted. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101047	DUANE YAMAMOTO		I strongly remain objected to the BLM preference route 8B, but favor instead, Segment 8 and 9D.	Your preferences are noted. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101047	DUANE YAMAMOTO		In April of 2009, I addressed a letter to you stating my objections and concerns surrounding the Gateway West Transmission Line as proposed by the BLM. Four years later in 2013, my concerns remain the same. My biggest and major concern is that the proposed route will go in a straight line across all of my property south of Kuna. The total number of acres that would be affected is 890. The City of Kuna annexed property into its area of impact well before any notice of the proposed transmission line was made public. The recommendation made by the National Landscape Conversation System to implement Segment 8B did not assess the financial impact to the cities of Kuna and Melba or private property owners. I sincerely hope a more amicable route will be chosen that will accommodate all parties.	The BLM is continuing to work with landowners, local officials, and other federal agencies to find a consensus route in Segment 8. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101048	TOM WHITE	MTB FARMS	Why in the world would BLM choose a route through private farm land when the MN Birds of Prey area is an uncultivateed open space with thousands of rodents avoulable for the raptors??	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101049	JON MORTENSEN	REYNOLDS CREEK CALF RANCH	I do not want these Towers built on my land. there are already Transmission Lines on the BLM South of my Feedlot, and there is NO good reason the New ones shouldn't go there as well.	Your opposition is noted. The BLM does not have the authority to permit a ROW across private lands. The Proponents would need to complete the state and county permitting processes and negotiate with individual landowners during final siting. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101050	ROBERT PROESCH	ROBERT PROESCH FARMS	We strongly Support Segment 8 and 9D	Your support is noted.
101050	ROBERT PROESCH	ROBERT PROESCH FARMS	oppose the BLM Preferred Routes C Segment 8B + 9E	Your opposition is noted.
101051	GREG E & RITA HOAGLAND	HOAGLAND FARMS	it needs to Be put on BLM Land. it will have the least impact on property values their. And they have the room.	Impacts to property values are discussed in Section 3.4 of the FEIS.

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101052	DAVID L PALFREYMAN		I concur with the above herein comments. Thank you for your consideration.	This comment is noted.
101053	SUZANNE JOHNSON, BYRON SCHMIDT	US AIR FORCE, MOUNTAIN HOME AIR FORCE BASE	Please see the attached letter from the DoD Clearinghouse. Unless there are changes that require another consultation, we are in agreement with the Preferred Alternative in the EIS. Please call if there are questions for us.	This comment is noted.
101053	SUZANNE JOHNSON, BYRON SCHMIDT	US AIR FORCE, MOUNTAIN HOME AIR FORCE BASE	Dear Mr. Bridges: At the request of the Chief, Airspace Management, Mountain Home Air Force Base, Idaho, the Department of Defense (DoD) Siting Clearinghouse coordinated a review of the proposed routing for Segment Nine, Gateway West Transmission Line Project, between Cedar Hill and Hemingway, Idaho. This review included consideration of the mitigation discussions conducted between the project proponents and representatives from Mountain Home Air Force Base concerning potential impacts to the Mountain Home Range Complex. The results of this review by DoD Components indicate that the Segment Nine route, as proposed, will have minimal impact to military operations, training and testing conducted in this area. It is requested that designated U.S. Air Force representatives continue coordination with the project developer during the planning phase to ensure any changes to routing or structure locations can be addressed. Note that this informal review does not constitute an action under 49 United States Code § 44718 and that neither the DoD nor the Secretary of Transportation are bound by the determination made under this informal review. Please call me at (571) 372-6745 with any questions, and feel free to share this letter with any of your investors or community partners.	Noted. The BLM will continue to coordinate with the U.S. Air Force regarding the route in Segment 9. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101054	TRAVIS HULET	HUEY FARMS	Private citizens should not be burdened with the cost and intrusion of high voltage lines going through private property, when there are options to go through BLM ground. The proposed routes by BLM (segment 8B, 9E and Segment 9) are opposed.	Your opposition is noted. The BLM does not have the authority to permit a ROW across private lands. The Proponents would need to complete the state and county permitting processes and negotiate with individual landowners during final siting. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101054	TRAVIS HULET	HUEY FARMS	I SUPPORT segment 8 and segment 9D.	Your support is noted.
101054	TRAVIS HULET	HUEY FARMS	The proposal hurts agriculture and places undue burden on private citizens and the communities they live in. The value of our homes and land will suffer if this proposal of the BLM goes through.	Effects to property values are discussed in Section 3.4 of the FEIS. The BLM does not have the authority to permit the project on private lands. The Proponents would need to complete the state and county permitting processes and negotiate with individual landowners during final siting.
101055	GORDON L & NANCY A THOMPSON		The feasible Route would be 9DFGH less environmental impact on land, Wildlife and Private Land. No impact on Sage Grouse. It would be the best route shown. The very best route would be 250 ft. right of side the Existing Line.	Your support for Alternatives 9D, 9F, 9G, and 9H is noted.

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101056	KENT SEARLE	CASSIA COUNTY GATEWAY WEST TASK FORCE	It is too bad that this process has not answered the questions and concerns of my previous letters. (See Feb 2, 2009. After almost five years of taking comments - very little has changed. You gave opportunity to comment - but whoever evaluated the information presented just ignored it and did just what the proponants wanted.	This comment is noted.
101056	KENT SEARLE	CASSIA COUNTY GATEWAY WEST TASK FORCE	Cassia + Power Countrys and others did not say no. We just wanted it sited where it would cause the least impact to the existing homes, farms, and other established businesses.	This comment is noted. Socioeconomic impacts are analyzed in Section 3.4 and agricultural impacts in Section 3.18 of the FEIS.
101056	KENT SEARLE	CASSIA COUNTY GATEWAY WEST TASK FORCE	A little over a year ago you changed the rules and the sage grouse became even more important than people. When the rules changed the process should have been required to start over. However, that would not had made a difference - you knew what you wanted to be the end result when the process started.	This comment is noted.
101056	KENT SEARLE	CASSIA COUNTY GATEWAY WEST TASK FORCE	The proponants did not want to cross BLM ground - it costs them an annual lease cost on BLM ground. But private property they have a one time cost. The impacts on the local economy are not correct and with land prices continuing to rise their estimates are not realistic.	More than half of the proposed Project length crosses public land, primarily BLM-managed lands. The FEIS analysis of socioeconomic impacts applies the best information available at the time of FEIS preparation, presented in Section 3.4. The BLM lacks the authority to permit a ROW across private lands. The Proponents will have to complete the state and county permitting processes, and negotiate with individual landowners during the easement acquisition process.
101056	KENT SEARLE	CASSIA COUNTY GATEWAY WEST TASK FORCE	We were allowed to speak but the information given was not fairly considered and evaluated. What could have been a cooperative effort will now result in a long and expensive fight.	This comment is noted. The BLM made extensive efforts to coordinate with landowners in Cassia County. The reasons for not selecting the County's preferred route are discussed in section 2.4.1 of the FEIS.
101056	KENT SEARLE	CASSIA COUNTY GATEWAY WEST TASK FORCE	BLM refused to allow Cassia County to be a cooperating agency and completely ignored Idahos Land Use Planning Act. This give the counties the right to site these projects.	Cassia County was a cooperating agency in the EIS process; the BLM has worked closely with the counties and all cooperating agencies for several years developing the EIS analysis. The BLM agrees and the FEIS states that the BLM does not have authority to site transmission lines on private lands or other public lands not under BLM jurisdiction. The Proponents will need to complete the state and county permitting processes for portions of the project proposed on non-federal lands.
101056	KENT SEARLE	CASSIA COUNTY GATEWAY WEST TASK FORCE	The requests to evaluate placing the lines underground as is being done elsewhere was basically ignored.	The EIS addresses burying the transmission line in section 2.6.3.1 of the FEIS. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost.
101058	KATHLEEN MALLORY,STEPHEN MALLORY		Please respect Idaho's decision to follow the existing power easement / right of way thru the Bird's of Prey. As you know this area is known world wide + everything will be done to follow the enhancement requirements	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. Therefore, the preferred alternatives in Segments 8 and 9 avoid the SRBOP as much as possible with additional mitigation to meet the enhancement requirement where they do cross.

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101058	KATHLEEN MALLORY,STEPHEN MALLORY		Pat + Mike Moretell @ 1171 Can Ada are my parents. My Husband + I will be retiring to our property directly South of mom + dad. Many thanks for all your efforts to keep the Melba Community as free as possible from Urban overexposure	This comment is noted.
101059	DONNA HOAGLAND		Our and your food supplies for us to eat would be seriously depleted from the farms acres.	Agricultural impacts are addressed in Section 3.18 of the FEIS. No significant effects to food supply are expected.
101060	GEORGE SCHNEIDER		Want all former comments of past 6 years to go on this comment period.	This comment is noted.
101061	ROBERT ANNO	ROBERT AND NANCY ANNO LIVING TRUST	Our property on Melba Road in Melba, Idaho has been in our family since my Grandfather homesteaded in 1920 after service in W.W. One. There is no reason thee "Enhancement Requirements" to the Birds of Prey cannot be met during construction, rather than devaluing valuable homes and agricultural land following the BIM preferred routes. Please do the right thing! Follow the will of the American people whom you work for.	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. Therefore, the preferred alternatives in Segments 8 and 9 avoid the SRBOP as much as possible with additional mitigation to meet the enhancement requirement where they do cross.
101062	HERBERT BLASER		BLM Preferred Routes would disrupt more Hawks + Eagles along the irrigated farmed portions than following the concensus route. There are also a lot of curlews that nest next to the BLM 9E route. I get this from farming 1500 acres adjacent to a portion of the 9R route. The route should focus the existing lower line south of the Union Pacific Tracts.	This comment is noted.
101063	DONALD CHISHOLM,MERLIN H JONES	JONES & WIDERBURG FARMS	<p>Portions of the property owned by Merlin H. Jones are dry land which are used for production of gran crops. Other portions are irrigated with pivot irrigation systems. The parcel owned by Jones and Widerburg Farms in Sections 8 and 17 of Township 10 South Range 28 East of the Boise Meridian are irrigated with center pivot irrigation systems. Having land condemned for overhead transmission lines through respective parcels of property on the proposed route would have a significant impact on the efficiency of their farming operations.</p> <p>The Jones family would not object to the location of the transmission line along the proposed route if the transmission line were buried, so that farming operations wouldn't have to be disturbed, except for the installation and occasional maintenance of the buried transmission line.</p> <p>There is a significant need to preserve the world's capacity for production of food to support the world's population. Taking farm land out of production is not in the long-term best interest of the United States. It would inhibit the ability of the United States to feed its population and it has economic impacts in the form of reduced employment and reduced income to the owners and taxes to local units of government.</p> <p>In instances in which overhead power lines would require that pivot irrigation systems be modified or eliminated, the power line will result in substantial loss of production or increased labor cost of irrigation by alternate means. If the power lines were buried where it crosses agricultural lands, that problem would be eliminated. Overhead power lines will also adversely affect aerial spraying crops by making</p>	Please refer to Section 2.6.3 for an analysis of underground alternatives. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost. Economic impacts are discussed in Section 3.4 of the FEIS, and agricultural effects are discussed in Section 3.18 – Agriculture. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The Proponents will negotiate with individual landowners regarding compensation for losses during the easement acquisition process. The BLM has no authority to permit the Project on private lands.

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			operations more costly per acre and less safe. Burying the lines may be more costly initially, but the maintenance and replacement costs should be substantially reduced. Compensating a farmer for the land which is "taken" and the severance damages based on current market values does not adequately compensate for the increased cost of operation of the remaining ground. Overhead power lines create areas which will be infested with weeds and will create potential fire hazards for adjacent grain crops.	
101064	MARY KESSINGER-HENNIS		If there's no Problem with the Birds of Prey-Idaho Power has no problem? Then why not listen to Property owners and High tax payers?	This comment is noted. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101065	MERLE AND LINDA CARLSGAARD		At the last meeting I heard 2 BLM Exec's bragging about getting the route thru private property. Meaning they BLM and Sec of Interior don't give a dam about the people that own ground that this project will affect. The added cost to the power companies must be transferred to the consumers of their power. Why I ask is it so hard for polititions to think what is best for the people that live here.	The BLM has listened to all public comments and takes their concerns seriously. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The Proponents will negotiate with individual landowners regarding compensation for losses during the easement acquisition process. The BLM has no authority to permit the Project on private lands.
101066	WILLIAM J BROCKMAN		This letter is in strong opposition to the proposed Gateway West Transmission line now being proposed across So. Idaho. I would also recommend that the comment period remain open until the final draft is published. If you own property anywhere near the So. Hills, in a jagged line between Wyoming and Boise, BEWARE. Public comment period will close June 28, 2013. Problem being, the final B.L.M. draft will not be out until late this fall, long after the comment period closes. While the large maps show the B.L.M. Preferred alternative, there is also a foot note in very small print that states, "Routes shown may not represent final construction alignment. No warranty is made as to the completeness or accuracy of this information." After four years of meetings, thousands of documents mailed and millions of our tax dollars wasted we have nothing with any accuracy to comment on! Another example why the State of Idaho should take over management of OUR Public Lands so these decisions could be made in Boise. This 1100 mile Public Utilities Project will be built 80% on private land, like it or not. I have mapped and submitted with my comments, a direct route through the So. Hills, on Public Lands, that will impact NO private land. Why would a Public Utilities Project not be built on Public Lands where available?	Your opposition is noted. The BLM has considered the request for an extended comment period, and, based on the comments received, believes the 60-day comment period was sufficient for the public to submit meaningful comments. It is common practice for the environmental review process to take place before final project engineering is complete. This allows important resources to be considered and avoided before detailed design work is completed. The analysis is based on indicative engineering that will be refined during final design, largely to incorporate specific comments from the public received during the NEPA process. More than half of the project route will be built on public lands. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The Proponents will negotiate with individual landowners regarding compensation for losses during the easement acquisition process. The BLM has no authority to permit the Project on private lands.
101066	WILLIAM J BROCKMAN		it's the Sage hen again. We scrapped the China Mountain wind farm project which would have produced the added power needed in the Magic Valley for years to come because of the sage hen. Still, I have seen no scientific evidence that would suggest either of these projects would negatively affect the sage hen population. In a direct quote from the TN Editorial, May 12, 2013, from a Fish and Game official who	Effects to greater sage-grouse have been analyzed and documented extensively in the FEIS (see Section 3.11 and Appendix J) and, as required by multiple laws and policies at the federal and state levels, avoiding impacts to sage-grouse has been a key factor in BLM's selection of preferred alternatives.

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			stated "hunting is the best thing for conservation of the species. It makes people care what happens to them." If you really care about the sage hen population and you want to help, buy a license and tags (which will help F&G) and kill a bunch of the remaining sage hen this fall. It most likely will be your last chance legally kill a threatened or endangered species.	
101067	GORDON THOMAS ZIMMERMAN		BLM's preferred routes requires the greatest amount of private land. Public Lands should be used for utility corridors, not private lands. BLM is skilled at environmental impact mitigation as evidenced by their surface reclamation following mining oil and for development mitigation, pipeline and powerline impact mitigation and extensive rehabilitation of wildfires. All of these activities have more impacts than they proposed powerline adjacent to an existing powerline.	More than half of the proposed Project length crosses public land, the vast majority of that on BLM-managed lands. The BLM lacks the authority to permit a ROW across private lands. The Proponents will have to complete the state and county permitting processes, and negotiate with individual landowners during the easement acquisition process.
101067	GORDON THOMAS ZIMMERMAN		I do not feel the environmental impacts have been fully addressed in terms of mitigation and I do not feel the Final EIS adequately addressed social-economic impacts. It focused more on short-term impacts rather than long-term impacts and does not fully describe impacts to communities.	The FEIS socioeconomics analysis addresses both short-term and long-term effects of the proposed Project (Section 3.4 of the FEIS); however, most effects are expected to be shorter term in nature. The FEIS includes extensive avoidance, minimization, and mitigation measures, summarized in Table 2.7-1 and detailed in Appendix C.
101069	CHAD JONES		I strongly believe, after looking at all the documentation and material the BLM provided at their open house in Kuna, ID that the site lines to the Owyhee mts will be greatly impacted from my home if Segment 8B is chosen instead of the original agreed upon Segement 8.	This comment is noted. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit the project on private lands. The BLM is implementing a phased decision, it will continue to work with local stakeholder on routing in Segments 8 and 9.
101070	LESLEE DONER, JOHN DOREMUS, RANDALL KAUFMAN, ROBERT ORR, JAMES WHITLOCK	SNAKE RIVER RAPTOR VOLUNTEERS	We have concerns with the proposed alternatives, routes 8B and 9E, which avoids many impacts on the SRBOPNCA but not all impacts. The National Landscape Conservation System was established "in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations." National Landscape Conservation System Act, 16 U.S.C. § 7202(a)(2009). Secretarial Order 3308 speaks to the management of the Conservation Lands, stating that "BLM shall ensure that the components of the NLCS are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values." The 15-Year Strategy for the Conservation Lands reinforces this by stating the "conservation, protection, and restoration of the NLCS values is the highest priority in NLCS planning and management, consistent with the designating legislation or presidential proclamation." Conservation Lands Strategy at 8. As conservation of natural and cultural resources is the principal mandate for BLM management of the Conservation Lands, the agency must diligently protect these areas from damage from new infrastructure projects, including transmission lines. Recent BLM policy guidance specifically addresses the management of BLM-managed national	The BLM Preferred Routes in Segment 8 and 9 generally avoid the SRBOP. The Preferred Route in Segment 8 crosses a 2-mile portion of the SRBOP within an approved utility corridor. The Preferred Route in Segment 9 crosses 8.8 miles of the SRBOP, 6.7 miles of which is in a designated corridor. The BLM finds that the impacts on the SRBOP in these areas can be mitigated to meet the enhancement criteria of the enabling legislation. A proposed land use plan amendment would allow the portion of the Preferred Route in Segment 9 outside of the designated corridor (see Appendix F of the FEIS). Mitigation measures are summarized in Table 2.7-1 of the FEIS. The BLM considered and complied with all directives in BLM Manuals 6100 and 6220 in selecting the Preferred Alternatives. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.

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			<p>monuments and NCAs and creates a presumption that BLM will not approve new rights-of-ways (ROW) in these areas. Specifically the manual provides:</p> <p>5. To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designating or authorizing use of transportation or utility corridors within NLCS units. To that end, and consistent with applicable law, when developing or revising land use plans addressing NLCS units, the BLM will consider:</p> <p>1. designating the NLCS unit as an exclusion or avoidance area;</p> <p>2. not designating any new transportation or utility corridors within the NLCS unit if the BLM determines that the corridor would be incompatible with the designating authority or the purposes for which the NLCS unit was designated; and</p> <p>c. relocating any existing designated transportation and utility corridors outside the NLCS unit.</p> <p>BLM Manual 6100, § 1.6J(5).</p> <p>The law establishing the Snake River Birds of Prey NCA includes specific provisions addressing allowable uses of the NCA “that will be compatible with the protection, maintenance, and enhancement of raptor populations and habitats and the other purposes for which the conservation area is established.” 16 U.S.C. § 460iii-3(b)(7). These “other purposes” include “the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.” 16 U.S.C. § 460iii-2(a)(2). Thus, only those proposed actions that would “protect, maintain, and enhance” the purposes of the NCA are permissible.</p> <p>Transmission line development causes serious impacts, including direct damage to wildlands, wildlife habitat and cultural resources; interference with scenic vistas; habitat fragmentation; and others. Consequently, transmission lines are generally incompatible with management of the Conservation Lands absent a specific showing of how such a project would “protect, maintain, and enhance” the raptors, raptor habitat and the other purposes for which the NCA was designated. The BLM has not provided analyses that demonstrate this standard has been met for the Gateway West line. Unless BLM can demonstrate how these transmissions lines would be good for the raptors we cannot support the lines going through the SRBOPNCA.</p> <p>We request that a route, which avoids the SRBOPNCA, be developed by the BLM.</p>	
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	<p>The BLM grading system for visual resources is completely arbitrary. There are seven characteristics that determine the grade (A, B, or C) that a landscape gets. They are on pages 3.2-4 and 3.2-5: landform, water, vegetation, color, adjacent scenery, scarcity, and cultural</p>	<p>The BLM system for determining Visual Resource Management class is not arbitrary; it is based on regulation and policy, which was followed for this Project and documented in Chapter 3.2.</p>

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			modification. This grading system raises several questions. For example, if this was “non-cultural” then it must be made clearer who is identifying these and through what cultural scope they are interpreting them. How much more complicated is the grading process?	
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	There cannot be recovery under these power lines because the vegetation underneath them suffers so badly because of the EMF. There is a risk along the entire ROW of plants under the lines not being able to grow back or growing back at a slower rate. There have been studies that show there is an issue.	BLM found no evidence that vegetation suffers from EMF (see Section 3.21, page 3.21-25). We are not aware of any studies that state otherwise. The utilities report that vegetation under other powerlines grows at a rate equivalent to vegetation away from the powerlines. During field visits for the agricultural analysis (Appendix K of the FEIS) we observed crops growing under transmission lines that appeared to be the same height as crops in other rows in the same fields.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	through who’s eyes is the landscape undistinguished?	The Forest Service system was set up to provide "high-quality scenery, especially that related to natural-appearing forests, [to] enhance people's lives and benefit society. (Ag Handbook 701, 1995)". The handbook, in its summary section, page 7, also specifies that "A landscape with very minimal visual disruption is considered to have high Scenic Integrity. Those landscapes having increasingly discordant relationships among scenic attributes are viewed as having diminished Scenic Integrity."
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	True mitigation for the Shoshone-Paiute Tribes would require preserving the contemporary meaning, uses, and practices associated with the KOPs and cultural landscapes identified in the FEIS for the GTL.	The BLM recognizes that avoidance is the best form of mitigation and attempted to select a route that avoided known sites where feasible.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	The way in which the BLM and USFS classify and grade landscapes and KOPs does not reflect the concerns of the Shoshone-Paiute Tribes.	The agencies acknowledge that the landscape has meanings for the Tribes that are different from the factors used in the VRM, SMS, or VMS systems. However, BLM and Forest Service regulations require that these systems be used to evaluate effects on BLM-managed and NFS lands, respectively.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	The idea that the line will most likely not be visible past five miles (p. 3.2-2) is irrelevant to the tribes because these areas are still used, and the tribes would like them protected and preserved for future generations to use.	The intent of the analysis is to determine if someone viewing the area from the KOP would see the transmission line. If it is not visible, then the EIS states that this is the case. This does not imply that there are no impacts, only that there is no visual impact for someone viewing the area from the KOP.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	It is also important to note that of the 35 landscapes the tribes identified for Walker Research Group Ltd. In the recent cultural landscape study of southern Wyoming and Idaho, only 12 overlap with those mentioned in the Gateway EIS report. This is an indication that the BLM failed to find all sites that the line will impact. Sites will be impacted beyond the mere range of the transmission line itself.	BLM only considered those landscapes within view of the Project. Tribal users of the additional landscapes will not be able to see the Project.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	For the Shoshone-Paiute Tribes the inclusion of our sites on a list with historic buildings and other man made structures that do not have anything in common with Native American sites has always been a concern. The Section 106 criteria is an assessment only from the view point of archaeology. Native American sites have a spiritual component that must be considered.	The National Historic Preservation Act, of which Section 106 is a part, was intended to encourage the federal government to preserve evidence of our past and to avoid adverse effects where possible on the physical remains of that past. It did not, and does not, take into account current spiritual use. There are other

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				federal laws, including AIRFA, which do take into account contemporary Native American land use and which are discussed in the EIS.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	In most instances there is no mitigation that would minimize the impact to tribes. When a site is impacted/destroyed by construction or excavated the result is the same, it is gone forever. The only mitigation acceptable to tribes is avoidance, and even then the sites under and in close proximity to the high voltage power line are destroyed because of the EMF generated by the power line.	The BLM recognizes the Tribes' position on mitigation. As noted above, the BLM found no evidence that vegetation suffers from EMF (see Section 3.21, page 3.21-25) and that the utilities report vegetation under other powerlines grows at a rate equivalent to vegetation away from the powerlines.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	We pointed out earlier that only the archaeology of our sites is considered. There is a spiritual element that is not being considered. Another thing that is not mentioned is the contemporary and ongoing uses of the sites and resources.	The BLM has engaged in government-to-government consultation with the Shoshone-Paiute tribes since the inception of planning for this Project in 2008. While the NHPA does not allow for the consideration of spiritual elements unless the resource or site is eligible for listing in the National Register and qualifies as an "historic property", the BLM has taken into consideration the two ethnographic studies conducted for this Project.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	First paragraph – “The BLM will consult with Indian Tribes on all cultural resources, not just those eligible for the NRHP.” When will this consultation take place? The Class III surveys are still underway. The discussion must take place after the all Class III surveys are completed and the information is made available to the tribes for review and comment, and before a decision is made.	The BLM has engaged in government-to-government consultation with the Shoshone-Paiute Tribes since the inception of planning for this Project in 2008. The BLM has required the Proponents to pay for two ethnographic studies, conducted by Dr. Walker with members of the Tribes. The BLM will continue to consult with the tribes as more information is available. However, a decision is likely to be rendered on the issuance of a ROW grant prior to completion of the Class III reports, as specified in the Programmatic Agreement for this Project.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	Consultation with traditional communities/groups undertaken by the BLM for other projects have identified types of properties that are generally considered Native American-sensitive-sites that could be TCPs.” Federal agencies are mandated to consult on a government-to-government basis with the leadership of federally recognized tribes. Federally recognized tribes are sovereign governments that have a unique standing the US Government (agencies). What are they doing speaking to someone other than the tribes about our sites and resources? The BLM cannot and should not speak to anyone on the side on their own and take that as consultation with the tribe(s). This is totally inappropriate.	The Shoshone-Paiute Tribes have not provided details on the location of TCPs, either during formal government-to-government consultation or during either of the two ethnographic studies conducted by Walker et al. Instead, the Tribes have consistently stated that everything in all landscapes is important. In the absence of information regarding TCPs, the BLM relied on conversations from OTHER projects that may indicate which sites may be considered sensitive. No such conversations were recorded for this Project. The BLM has engaged in government-to-government consultation with the Shoshone-Paiute Tribes since the inception of planning for this Project in 2008.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	“Within this cultural landscape Native Americans practiced their ceremonies, interacted with natural/supernatural forces, and maintained their roles as part of the everlasting cycles.”	The statement at the bottom of page 3.3-11 is a quote from a BLM archaeologist in Rock Springs regarding a cultural landscapes study conducted outside the Gateway West Project. The next sentence from the one quoted goes on to say, "The landscape has seen extensive and dedicated use for vision quests, healing ceremonies, birth rituals, death rituals, and other ceremonies critical to the communal lifestyles of the modern Tribes and their ancestors." This makes it clear that these ceremonies are continuing in the present.

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101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	The BLM and USFS must provide a full inventory of what they found. The Shoshone-Paiute Tribes prefer the IMAC forms of all of the sites, this is important for tribes to know, this can lead to additional information that only tribes understand, and cannot be interpreted by an archaeologist.	The Programmatic Agreement, in which the Shoshone-Paiute Tribes are a Consulting Party, specifies that the Class III reports will be completed prior to construction, not prior to a decision regarding the ROW grant. Class III reports will be available to the tribes when they have been reviewed and approved by the BLM and by the respective State SHPOs.
101071	TED HOWARD	SHOSHONE-PAIUTE TRIBES	Many of the artifacts may fall under the stipulations of NAGPRA and subject to repatriation. Although some of the artifacts and/or skeletal material being uncovered by archaeologists in the Gateway right-of-way may be on federal, state, or privately owned lands within our homeland, these artifacts belong to our ancestors whom we continue to venerate, and we believe, as their descendants, these artifacts should be returned to their points of discovery. If this proves impractical or unworkable because of construction of the power line, they should be returned to the Shoshone-Paiute Tribes of the Duck Valley Indian Reservation for tribal disposition.	Federal laws, including NAGPRA, control the disposition of Native American human remains and funerary artifacts discovered on federally managed lands. BLM has no control over the discovery and disposition of such remains and artifacts on state and private land, where the state laws of Wyoming or Idaho will prevail. Not all human remains that may be found pertain to the Tribes: Chinese workers, Euro-American emigrants, and others perished in the area of the Project and their remains may still be present.
101073	KAREN STEENHOF		In my comments on the Draft EIS, I pointed out that "The DEIS failed to incorporate important published and unpublished data about raptors, habitat, and prey species in the NCA." Your response to my comments was: "We are not clear on what published and unpublished data you are referring to. Please provide specific examples." I have attached a list of publications based on research on raptors, habitat, and prey in the NCA. I hope that these findings were considered in the Compatibility analysis and, if not, that they will be considered in future decisions about Gateway West alternatives.	The analysis included many studies, including studies conducted by the commenter. While not every raptor study was included, we believe that sufficient scientific information was included to assess the relative impacts between alternatives and provide decision-makers with sufficient data to make an informed decision. Please note, the EIS does not disagree with the position that the towers would not harm raptors. The issue is the inadequate mitigation offered to date to compensate for new disturbance and including roads.
101074	JANELLE BARRILLEAUX		the event that there is an aboveground line near an airport, there may be airspace implications. Therefore, the project proponent would need to file an FAA Form 7460, Notice of Proposed Construction or Alteration, for analysis.	The Proponents have been notified of this requirement.
101075	SHARON STRICKLAND, RICHARD STRICKLAND JR		We are homeowners & landowners in Gooding County, Idaho, at T.6S, R.14E, Section 22. We have been reviewing the final EIS and interactive maps, etc. It appears that the BLM preferred route in Section 8 for the Gateway West 500-V line will run directly south of our property, parallel to an existing line that is approximately 1/4 - 1/2 mile south of our land on another landowner's property. Can you confirm the proximity of the preferred route in relation to our property? The information in the EIS is very confusing, as to preferred routes, alternative routes, key observation points, etc., because there are several existing lines south of us that could be alternatives.	The current route is based on indicative engineering, which means that the precise final location has not yet been determined. Based on the indicative engineering, you are correct that the BLM Preferred Route in Segment 8 does cross T.6S, R.14E, Section 22, approximately 300 to 400 feet south of an existing lower voltage transmission line. We are sorry that you found the information in the EIS confusing. The BLM has sought to be as clear and transparent as possible. Without the final design or knowing your specific property boundaries, it is only possible to confirm this general proximity to your property at this time. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit the project on private lands.
101076	MATTHEW TEICHERT, TIMOTHY M	TEICHERT BROTHERS, LLC	Each one of the segment 4 routes proposed in the FEIS would traverse our property. Four generations of our family have ranched in the Bear River valley since our Granddad settled in 1927. We feel it important to have a say	The presence of the easement is noted. The BLM is working with the Proponents and local government to develop a route that avoids the easement.

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	TEICHERT		<p>in any project that may negatively impact land values or inhibit our ability to continue this ranching tradition.</p> <p>In an effort to protect our culture and ranching heritage, we worked with the Natural Resource Conservation Service (NRCS) to place a wetlands reserve easement over the home property. Project proponents have been on-site and have noted the markers identifying the boundaries of the easement. Among other protections, the easement agreement prohibits any new ROW's across the identified property. Surprisingly, this was not identified in any of the previous NEPA analysis that shows the proposed lines crossing the easement.</p> <p>The route being proposed in the FEIS would place the transmission line through the original ranch homestead. There are three existing transmission lines approximately a half mile to the south. We initially discovered the proposed route while crews were conducting surveys and geotechnical studies well to the north of the existing lines. This came as a surprise since this route had never been mentioned in previous discussions with the proponents. The survey markers showed the high voltage lines running nearly overhead of ours and a number of other residences.</p> <p>As soon as it became apparent that the proposed route could impact a disproportionate amount of private land and residential areas, we objected. In order to minimize these impacts, we met with Town and County officials to come to a solution. We considered several options such as burial of the line and a re-route that would avoid residential areas and the easement. If these were deemed unobtainable, we suggested adopting Alternative Route B/ D as the preferred alternative.</p>	
101076	MATTHEW TEICHERT, TIMOTHY M TEICHERT	TEICHERT BROTHERS, LLC	<p>As soon as it became apparent that the proposed route could impact a disproportionate amount of private land and residential areas, we objected. In order to minimize these impacts, we met with Town and County officials to come to a solution. We considered several options such as burial of the line and a re-route that would avoid residential areas and the easement. If these were deemed unobtainable, we suggested adopting Alternative Route B/ D as the preferred alternative.</p> <p>When we suggested these changes to State and BLM officials, we were told that they could not be considered because they lie within the Sage Grouse Core Area. The proposed route too lies within the Sage Grouse Core Area but is exempt by the Governor's Executive Order. It appears that Sage Grouse now have precedence over historic trails, view-sheds, big game migration corridors and human habitat.</p> <p>We can appreciate the lengths that the BLM and State of Wyoming have gone through to protect the Sage Grouse from potential listing, even though we've seen no such declines in bird populations. It would be a devastating blow if the bird were to be federally listed. However, it's amusing that the agencies would require a three mile buffer from the perimeter of a sage grouse lek and yet allow high voltage power lines overhead of residential areas. The human environment should always take precedence.</p>	<p>The line shown in the FEIS is based on indicative engineering. The design line would not pass directly over anyone's house. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit the project on private or state lands. Avoiding effects on historic trails and historic sites in the Kemmerer area was a major factor in identifying the preferred route for Segment 4, along with protecting sage-grouse and other multiple use considerations. Refer to section 2.4.1.1 for a discussion of the preferred alternative.</p>

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101076	MATTHEW TEICHERT, TIMOTHY M TEICHERT	TEICHERT BROTHERS, LLC	We should note here that we are not opposed to the Gateway West. We actually depend on electricity. We are very concerned however with the FEIS' selected route through the easement and its proximity to structures and residences near Cokeville. The Mayor and Council of Cokeville, County Commissioners and neighboring landowners have expressed similar concerns. We will pursue all options, including legal action if necessary, to protect our most valuable asset.	The BLM continued to work with the Proponents and local government following comments on the FEIS to develop a route that avoids the easement. Refer to the analysis of possible re-routes attached to the ROD.
101076	MATTHEW TEICHERT, TIMOTHY M TEICHERT	TEICHERT BROTHERS, LLC	We are also disappointed with the NEPA analysis and the attempt to make the proposed route appear least impactful compared to other routes. The Bear River has some of the oldest water rights in the state of Wyoming, many of which pre-date statehood. The proposed route would cross nearly a dozen canals and ditches with territorial water rights that were not considered in the NEPA analysis. The FEIS also failed to analyze impacts of the preferred route on the proposed Sublette Creek Reservoir south and east of Cokeville, which is currently being considered at a level III study.	The BLM Preferred Route in Segment 4 generally follows an established utility corridor on BLM-managed lands, paralleling three existing transmission lines for approximately 75 percent of its length. It was also the preferred route identified by the State of Wyoming and the route Lincoln County recommended in their comments on the DEIS. The Cokeville Development Company, sponsor of the Sublette Creek Reservoir project, confirmed in their FEIS comments that the preferred route would avoid the reservoir. Water resources, including all known water rights, are assessed in FEIS Section 3.16.
101076	MATTHEW TEICHERT, TIMOTHY M TEICHERT	TEICHERT BROTHERS, LLC	The FEIS continues to insist that Alternative Routes 4B and 4D would cross the Cokeville Meadows NWR and would result in high visual impacts. These private lands crossed by Alternative Routes are not part of the Cokeville Meadows NWR lands. The FEIS must make clear that these lands are not part of the Refuge and cannot be forcibly managed as a wildlife refuge. Further, the Gateway West Transmission Line will not impact the "pristineness" of the refuge. Transmission lines currently exist across Cokeville Meadows NWR owned lands. Therefore, the character of these lands will not change from their current condition.	The EIS distinguishes between lands in the Refuge boundary and private lands within the boundary. Section 32.4.5.3, which describes the alternatives for Segment 4, states " Alternatives 4B " would cross the Cokeville Meadows NWR south of the current NWR-managed lands, although still within the established boundary."
101076	MATTHEW TEICHERT, TIMOTHY M TEICHERT	TEICHERT BROTHERS, LLC	We request that the BLM adopt one of the following alternatives: (1) first, require the proponents bury the Gateway West Transmission Line as it passes south of Cokeville (See Ex. 1); (2) reroute from the Proposed Route southeast of Cokeville to connect with Alternative 4C south of Cokeville airport (See Ex. I); and (3) finally, if neither (1) nor (2) are possible, we support Alternatives 4B and 4D to avoid impacts to residential areas.	The BLM is working with the Proponents and local government to develop a route that avoids the crossing between the Bridger lines and the town. The EIS addresses burying the transmission line in Section 2.6.3 of the FEIS. The additional cost and disturbance identified in that section would apply to an eight-mile section, as well as to a longer segment. Placing a 500-kV line underground would cost additional 7 to 12 times as much as building an overhead line. Based on an average aboveground cost of \$2 million per mile, placing an 8-mile section underground would cost between \$112 and \$208 million compared to \$16 million for an above ground line. This cost would be passed on to ratepayers, assuming the state regulators would approve this unusual additional cost. In addition, burying the line requires digging a continuous trench, requiring at least a 30-foot-wide disturbance area (see Figure 2.6-2 in the FEIS). Installations similar to substations would be required at each end of the underground section; each would require about 4 acres. The reliability of an underground 500-kV line over the life of the Gateway West project is unproven. The BLM appreciates the

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				concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville without the cost, disturbance, and risk of a buried line. Following the reroute recommended in the comment would cross approximately 7 miles of core sage-grouse habitat outside of a designated corridor. A disturbance calculation was completed for this area in July 2013. The existing disturbance was over 23 percent. The Governor's order limits disturbance to 5 percent in core areas outside a corridor. Therefore, this alternative was not considered.
101077	JOYCE BURCH		Segment 8 and 9D are the routes that should be chosen.	Your support for the Proposed Route in Segment 8 and Alternative 9D is noted.
101077	JOYCE BURCH		We vehemently oppose the BLM preferred routes 8B and 9E, and the proponents' proposed segment 9 as expressed in the Final Environmental Impact Statement.	Your opposition is noted.
101077	JOYCE BURCH		The citizens and the Idaho government worked hard to come to a consensus and Washington D.C. should not throw that out. There is no good reason to do that. The "enhancement requirements" to Birds of Prey can be met within the construction process of the project.	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared.
101078	CLOYD R SEARLE		Your present proposed power line route will greatly affect us negatively. You're looking at making a power corridor which will bring more lines through this area. Parts of this farm has been in our family for years. And you are crossing a good share of it. We have made comments on this before and it seems to have been over looked. We still have the same concerns that were listed in the previous comments. I feel that the best route would be the proposed Southern route that has been proposed and supported by our county Commissioners' and zoning committee	It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit the Project on private lands. The Proponents will need to complete the state and county permitting processes, and negotiate with individual landowners during the easement acquisition process to compensate for damages to agricultural operations.
101079	JOHN "BERT" STEVENSON	MINI-CASSIA CHAMBER OF COMMERCE AND VISITOR CENTER	We are concerned that the BLM is not giving due consideration to the negative impacts on the agricultural private property. The following is the Cassia County Ordinance: Electrical Transmission Corridors. Major electrical transmission lines come from power plants located outside of the county and from the Minidoka Dam-Lake Walcott Generation site. Several cooperatives distribute power throughout the County, such as Raft River Electric and United Electric. Cassia County will correlate with neighboring counties, local utilities and interested citizens to develop transmission corridors through Cassia County. Cassia County recognizes that there is a need for improvement and enhancement of the power transmission grid. Based upon this recognition, the County will be proactive in determining its destiny with regard to siting transmission facilities in and through the County. The County will also fully access and seek to assert its rights to coordinate with federal and state land management agencies to assure that local plans and interests are protected in utilization and management activities of federal lands for such	The FEIS acknowledges adverse effects to agricultural lands. Economic effects are analyzed in Section 3.4, also see Section 3.18, and Chapter 4 (Cumulative Effects) of the FEIS and the agriculture analysis in Appendix K. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit the project on private lands. The Proponents will need to complete the state and county permitting processes, and negotiate with individual landowners during the easement acquisition process to compensate for damages to agricultural operations. Please refer to Section 2.4.1 for the reasons the BLM was unable to select Alternative 7K as its preferred alternative.

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			<p>corridors. These transmission corridors will be determined based upon a number of pertinent factors including, but not necessarily limited to: minimization of impact upon residence and existing residential development; and minimization of impact upon irrigated cropland, confined animal feeding operations, environmentally sensitive areas, wetlands, housing developments, etc. The County shall also consider national reserves in determining corridors. Essentially, it is the policy of the County that those uses benefitting the general public should be sited on public land as much as possible. (Amended 10-05-2009, Ordinance 2009-10-01). Overall, we feel the ESA downplays the cumulative impact on private property and agricultural uses while at the same time significantly overstating the cumulative effect on something like "cultural resources." The BLM does recognize, on Pages 2-206 that there are "other past, present and foreseeable future projects including additional transmission lines which make the cumulative effects also significant." It appears the BLM has not sufficiently studied the cumulative impact on private land uses and agriculture.</p> <p>We would ask you to please consider the plan recommended by Cassia County contained on Gateway West Transmission Line Final ESA Table 2.4-1, Segment 7, Alternative 7K. This is contained in Chapter 2-Alternatives p.2-36. When possible, we feel transmission lines should be placed on public lands because they are for public use. We feel it is unfair for the private property owners to bear the burden when there are other alternatives. Thanks you for allowing us to express our concerns.</p>	
101080	BERT BRACKETT	STATE OF IDAHO, LEGISLATIVE DISTRICT 23	<p>I am very disappointed that the BLM chose a route for Segment 9 that generally avoids crossing the Birds of Prey NCA. Instead they propose to go through irrigated private land and on sage grouse habitat. By co-locating along the existing transmission line through the Birds of Prey, the proposed line could avoid both the majority of private land and sage grouse habitat. This was the consensus route developed by the local resident and local and state BLM officials. When the Birds of Prey NCA was created it was contemplated that transmission lines could cross the area and that it would be compatible with the Birds of Prey designation. The creation of the Birds of Prey NCA was generally supported by the local residents so it is now very disingenuous to put it off limits to uses that were contemplated when it was created. If the line is placed on either of the other alternatives, it will have a negative cultural and economic impact on the private land or will have a negative impact on sage grouse. The governor's sage grouse task force recommends co-locating with existing transmission lines and avoiding sage grouse habitat, so it is disappointing the BLM would ignore the recommendations of the task force even after the Fish and Wildlife Service has written a concurrence letter on the plan. I do support the proposal to do a phased decision approach on segments of the line.</p>	<p>Your concerns about the BLM's Preferred Route are noted. The BLM is continuing to work with local interests to resolve issues. Refer to Section 2.4.1.1 for the reasons that Alternative 9D was not preferred.</p>

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			That would give more time to overcome objections to co-locating the line through the Birds of Prey and also more time to survey a crossing on the Snake River. If you are sincere about considering input from the locals, you must sincerely consider the consensus proposal through the Birds of Prey.	
101081	CHAD JONES		I strongly feel that segment 8, which was negotiated and selected by the LOCAL invested parties should be the route selected for the Gateway West Transmission lines. The "BLM Preferred Route", Segment 8B, I believe will greatly impact the beautiful vista of the Owyhee Mountains from my home.	Your support for the Proposed Route in Segment 8 is noted. The BLM is continuing to work with local interests, including landowners, to resolve routing issues.
101081	CHAD JONES		The impact to the Birds of Prey area can be mitigated by constructing the lines during periods when the birds are not nesting and/or have migrated out of the area for the season. Maintenance activities can also follow the same "off-season" guidelines. Also, the necessary enhancements outlined by the Birds of Prey charter can be, I believe, easily factored into the Transmission Lines construction.	Alternatives to the Preferred Routes in Segments 8 and 9 that were primarily within the SRBOP NCA were not selected due to concern over consistency with the enabling legislation. It was felt that mitigation measures and siting location of the section in the eastern portion of the NCA that does not fall within the designated corridor could not sufficiently mitigate impacts in this section as to continue to comply with the enabling legislation.
101082	SAM & PATRICIA BENNION	COKEVILLE DEVELOPMENT COMPANY	The proposed BLM Preferred Alternate, Segment 4, the red line on the attached map, which goes just north of the existing power transmission line is the best option for the CDC. The CDC has been working with the Wyoming Water Development Commission for many years to find a suitable site for an irrigation water storage reservoir within the Bear River Drainage near Cokeville, Wyoming. After many years of studies, the Sublette Creek Drainage now appears to be the best place. If the proposed Gateway West Transmission Line Project does not go north of the existing power transmission line and goes south it would go right through the proposed reservoir site in the Sublette Creek Drainage near Cokeville, Wyoming. It would be a disaster to ignore many years of studies and financial costs incurred by the State of Wyoming and local residents to find a reservoir site.	Your support for the BLM's Preferred Route in Segment 4 is noted. As proposed, the route would remain north of the existing transmission line and avoid the reservoir site referred to in the comment.
101082	SAM & PATRICIA BENNION	COKEVILLE DEVELOPMENT COMPANY	The CDC would support the idea to bury the proposed transmission line near the Town of Cokeville so residents will not have any more health or view shed concerns than currently experienced. There is also a safety issue due to the public airport near Cokeville.	Issues related to underground alternatives are discussed in Section 2.6.3 of the FEIS. The BLM concluded that it could not require this option due to the additional disturbance (see the figures in Section 2.6) and the much greater cost. The airport is on private land; it is up to the county and the state to set standards for siting the line in this area. The BLM will continue to work with the county if requested to help resolve routing issues.
101083	VINCENT BLOMMEL		It is unfortunate the amount of miss information between the utility company an agency that should be acting in the behalf of the public. The reason for the utility company spending so much energy on this new corridor so not for the purpose of security as how it has been presented but for the expansion of new corridors creating greater access into areas where access would likely be declined in the future. Current utility corridors are the appropriate location for an additional transmission line.	The BLM has sought to utilize existing utility corridors wherever possible. Table 2.4-3 summarizes the length and percentage of the FEIS routes that align with West-wide Energy Corridors and existing corridors. Chapter 1 of the FEIS includes a detailed discussion of the Proponents' objectives for the Project.

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101084	STANLEY THOMPSON JR	TOWN OF COKEVILLE	The EIS presents several variations for segment 4 that were proposed to limit adverse impacts on sage grouse, historic trails, viewshed, and a special management area. The EIS analyzes five additional routes for segment 4, all of which were proposed by BLM. These alternatives sacrifice human core habitat to protect historic trail values, viewshed, sage grouse and big game ranges. None of the analyzed routes address impacts to private residences in the Cokeville vicinity. The human environment should always take precedence.	The BLM Preferred Route in Segment 4 generally follows an established utility corridor on BLM-managed lands, and parallels three existing transmission lines for approximately 75 percent of its length. It was also the preferred route identified by the State of Wyoming and Lincoln County in their comments on the DEIS.. The BLM has continued to work with local government as requested to resolve routing issues. See the re-route analysis report attached to the ROD.
101084	STANLEY THOMPSON JR	TOWN OF COKEVILLE	<p>Placement of Line Underground</p> <p>The EIS considers placing the Gateway West Transmission Line underground and concluded that it was not feasible. Underground lines may cost more than overhead lines and take longer to construct. However, the Town only proposes placing approximately 8 miles of the line underground near the residential area of Cokeville, not the entire length as the EIS proposed. This is reasonable mitigation due to the impacts on property values. This is similar to the many buried natural gas pipelines near Cokeville, but with much less environmental risk or harm.</p> <p>The only environmental concerns are the fact that a trench would need to be constructed for the entire underground portion of the Line and there is potential for fluid leaks and pipe corrosion. The environmental impact to existing habitat caused by the trench would be minimal as this portion of the line runs through residential areas with no special management restrictions for wildlife, particularly the sage-grouse. Burying high voltage power lines is safer, more reliable and efficient, does not visually blight on the landscape, does not devalue property, has fewer environmental impacts, incurs lower maintenance costs, and is actually cheaper than overhead lines over the life of the line. It has also been very successful in Asia, Europe, and Canada.</p>	The EIS addresses burying the transmission line in Section 2.6.3 of the FEIS. The additional cost and disturbance identified in that section would apply to an eight-mile section, as well as to a longer segment. Placing a 500 kV line underground would cost additional 7 to 12 times as much as building an overhead line. Based on an average above ground cost of \$2 million per mile, placing an 8-mile section underground would cost between \$112 and \$208 million compared to \$16 million for an above ground line. This cost would be passed on to ratepayers, assuming the state regulators would approve this unusual additional cost. In addition, burying the line requires digging a continuous trench, requiring at least a 30-foot wide disturbance area (see Figure 2.6-2 in the FEIS). Installations similar to substations would be required at each end of the underground section, each would require about 4 acres. The reliability of an underground 500 kV line over the life of the Gateway West project is unproven. The BLM appreciates the concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville without the cost, disturbance, and risk of a buried line.
101084	STANLEY THOMPSON JR	TOWN OF COKEVILLE	Reroute Connecting Proposed Route 4 with Alternative Route 4C. If BLM rejects the underground option, then the Town would ask consideration of the Proposed Reroute shown on the attached map. (See Ex. 1). Under the Proposed Route 4, the Kemmerer RMP would already need to be amended to allow "site disturbing activity within closer distance of a National Historic Trail (NHT), to permit the Project in a VRM II area, and to permit a one-time allowance for the Project where it would otherwise conflict with historic preservation management." FEIS 2-49-2-50, Appx. F 1-12-1-14. By selecting the Town's Reroute over the current Proposed Route 4, the only additional concern is that the reroute passes through sage grouse core areas outside of the Wyoming Governor's designated sage grouse corridor. Wyoming Executive Order 2011-5. New transmission lines sited outside established corridors are allowed if it is demonstrated that the activity will not cause a decline in sage grouse populations. Id. After connecting with Alternative Route 4C approximately six miles south of Cokeville	The BLM has worked cooperatively with the Lincoln County Conservation District and the state and counties to find a route that meets everyone's needs. Remaining within the Wyoming governor's sage-grouse corridor was a primary driver of the route in Wyoming. Routing through core habitat outside the governor's corridor in order to avoid private land is not consistent with the governor's executive order. Following the reroute recommended in the comment would cross approximately 7 miles of core sage-grouse habitat outside of a designated corridor. A disturbance calculation was completed for this area in July 2013. The existing disturbance was over 23 percent. The Governor's order limits disturbance to 5 percent in core areas outside a corridor. Therefore, this alternative was not considered. Also, placing the line on the south side of the three existing lines on federal land would impact cultural resources (refer to Section 3.3) as well as other resources that the BLM is required to consider. The BLM is

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			along US 30, the line crosses to the north of current managed NWR lands. It avoids the BLM -designated Bear River and Rock Creek Ridge SRMAs along US 30/SR89 and the impacts to Fossil Butte National Monument.	working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville without the cost, disturbance, and risk of a buried line.
101084	STANLEY THOMPSON JR	TOWN OF COKEVILLE	Alternative Routes 4B and 4D. If neither the underground alternative near Cokeville nor the proposed reroute is selected, then the Town supports Alternative Route 4B/4D, because neither of these routes directly interferes with human health or residential developments. Under both Alternative Routes 4B and 4D, the Kemmerer RMP would have to be amended to address structures in sage-grouse habitat and impacts to visual resource management areas. Alternative Routes 4B and 4D cross the Bear River valley south of the Cokeville Meadows NVVR. Either of these two alternatives would require amendments to the Kemmerer RMP similar to those amendments already required to the Green River RMP if the line is closer than .6 miles of sage grouse leks. See FEIS 2-50- 2-51. Alternative Routes 4B and 4D would be outside the established sage grouse corridors, so a demonstration that construction of the transmission lines will not cause a decline in the sage grouse populations would be required. See Wyoming Executive Order 2011-5. The Town proposes that Alternative Route 4B or 4D become the preferred Alternative if BLM rejects the other changes to the Proposed Route. We recognize that these alternatives are not within the two mile corridor, but they may still comply with the Wyoming Executive Order. Although the scientific data are not currently available, it is very likely that Alternative Routes 4B and 4D will not harm sage-grouse populations considering the impacts that current development and structures, such as highways and railroads, have already changed the sage-grouse habitat.	Avoiding effects on historic trails and historic sites in the Kemmerer area was a major factor in identifying the preferred route for Segment 4, along with protecting sage-grouse and other multiple use considerations. Refer to Section 2.4.1.1 for a discussion of the preferred alternative, including why Alternatives 4B and 4D were unable to be selected. The BLM appreciates the concern of local residents and has continued to work with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville. See the re-route analysis attached to the ROD.
101084	STANLEY THOMPSON JR	TOWN OF COKEVILLE	Fossil Butte National Monument Alternatives 4B/C and 4D/E would be visible from the Fossil Butte National Monument visitor center parking lot. However, County Road 300, US HWY 30, the Union Pacific Railroad-Oregon Shortline, two existing large power lines, a Williams Gas Compressor Station Site, the Williams Northwest Pipeline corridor, and at least a half dozen fossil quarries are currently visible from the parking lot. The proposed transmission line would have a minimal impact on visible resources. With all of these other land uses and linear corridors nearby, Alternatives 4B and 4D are not creating new land uses negatively impacting the visual resources from the parking lot of the Fossil Butte National Monument. Further, Alternative 4B should not be considered a "greenfield route" near the Monument, because it follows existing corridors.	As discussed in Chapter 2 of the FEIS, Alternatives 4B through 4E are generally consistent with the Kemmerer RMP's management objectives; however, 1) they are not consistent with the Wyoming Governor's sage-grouse EO; 2) they cross the Cokeville Meadows NWR Acquisition Area; 3) Alternatives 4B and 4C are in view from Fossil Butte National Monument; 4) they cross almost 50 percent more streams, and 5) they encounter approximately 30 percent more acres of unstable soils. Visual impacts, assessed following BLM's VRM procedures (see Section 3.2), were one of multiple reasons these routes could not be selected as BLM's preferred alternative.

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101084	STANLEY THOMPSON JR	TOWN OF COKEVILLE	Cokeville National Wildlife Refuge The EIS states that Alternative Routes 4B and 4D "would cross the south end of the Cokeville Meadows NWR, although not lands managed by the USFWS, [which] would result in moderate to high visual impacts in the refuge due to the impact on pristine refuge land with little human-made elements apparent from most views." See also FEIS 2-50-2-51. The lands crossed by Alternative Routes 4B and 4D are not part of the Cokeville Meadows NWR lands. The only lands which may be managed as wildlife refuges are public lands withdrawn from other uses, lands donated to the agency, lands purchased by the agency, lands exchanged by the agency, or any lands managed as wildlife refuges pursuant to a cooperative agreement with any state or local government, any federal department or agency, or any other governmental entity. 16 U.S.C. § 668dd(a)(6). The lands crossed by Alternative Routes 4B and 4D do not qualify for management as a national wildlife refuge under 16 U.S.C. § 668dd(a)(6). Therefore, the FEIS must make clear that these lands are not legally part of the Refuge and cannot be forcibly managed as a wildlife refuge. Further, the Gateway West Transmission Line will not impact the "pristineness" of the portion within the boundaries of the Cokeville Meadows NWR it crosses. Transmission lines currently exist in the same areas that the proposed Alternative Routes 4B and 4D will cross. Therefore, the character of these lands will not change from their current condition.	The statement in the EIS is correct. The EIS states that the lands are not part of the refuge. While these alternatives would not cross lands within the refuge, they would affect the scenery in the area.
101084	STANLEY THOMPSON JR	TOWN OF COKEVILLE	Socio/economic Mitigation Measures The Town encourages the location of associated worker housing within existing communities where services can be provided. The proponents, contractors and subcontractors should contract with local motels and hotels for temporary accommodation during construction of the Project site. The Proponents must provide transportation to the Project site in the form of buses or vans, depending on workforce numbers, to ensure workers arrive at the Project site safely and to lessen the impacts to existing roads.	The Proponents will be required by the WDEQ to develop a detailed housing plan for the Wyoming portion of the Project as part of the Wyoming ISC process. As there may not be sufficient housing within a 90-minute drive of this portion of Segment 4 (see Section 3.4 of the FEIS), the Proponents would evaluate potential housing mitigation. Mitigation in this case would likely involve seeking temporary accommodation for workers in the larger communities located between 90 minutes' and about 2 hours' driving time from the affected parts of the segment, and the provision of transportation, in the form of buses or vans, to ensure that workers are able to travel safely to the site.
101085	CHAD NETTLETON		Segment 9E would be extremely detrimental to sage grouse populations in that particular area, whereas there are no sage grouse in segment 9D. Tall towers give birds of prey a perch to hunt from, one of the reasons it would actually enhance the NCA (segment 9D), and negatively impact sage grouse populations. As a rancher who runs cattle on BLM managed ground, sage grouse issues are of great concern, and the preferred current alternative is incredibly irresponsible. Transmission line gives raptors a place to perch, nest, and hunt from. Therefore the line is in keeping with the Nation Conservation Area's mission statement of enhancing the habitat for birds of prey in segment 9D. Somebody approved building a really nice road and a large training facility for our military and law enforcement in the middle of the NCA. Clearly, additional traffic and firing fully automatic weapons does not	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues.

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			enhance the habitat of the NCA so the decision to exclude the transmission line was purely political.	
101085	CHAD NETTLETON		Segment 9E negatively impacts a large amount of private land. Our ranch has been in my family since 1865 and has indisputable historical significance. As its drawn now, segment 9E runs directly over the top of my house and through the middle of our ranch. Not only will it severely disrupt farming and ranching activities and limit our ability to upgrade the irrigation systems to pivots, but the value of our historical property will be lowered significantly and irrefutably scarred.	The transmission line would not cross directly over any house in the final design; current maps are based on indicative engineering and would be refined to avoid residential structures. The BLM sought to avoid most private land in the routing of Alternative 9E, but understands there remain issues on the 3.3 miles crossed. We will continue to work with local residents and stakeholders to seek a consensus resolution to siting issues in Segment 9.
101085	CHAD NETTLETON		Segment 9D is shorter and doesn't have to cross such rough terrain, making it the best route from a cost standpoint. Locally, the BLM, environmental groups, ranchers, recreationalists, elected officials, and citizens in general are in agreement that 9D is a much better route than 9E. It doesn't happen very often that you can get all of these individuals and groups to agree on anything so when they do, it is clearly the best course of action. It saddens me that years of collaborative efforts to find the best route get trumped by someone in Washington DC who doesn't want to set a precedent of routing utilities through National Conservation Areas.	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues.
101085	CHAD NETTLETON		I endorse a phased decision on right of way grants, allowing more time to work on getting this 500kV line sited in the correct location.	The BLM has decided to follow the phased decision approach, and will continue working with all stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Gateway West Project. The current decision only applies to BLM-managed lands in Segments 1 through 7 of the Project.
101085	CHAD NETTLETON		I am adamantly opposed to your currently preferred route, segment 9E of the Gateway West transmission line project. For a multitude of reasons, segment 9D is a much better option.	Your opposition to Alternative 9E and preference for Alternative 9D is noted. The BLM will continue to work with local interests to resolve routing issues.
101085	CHAD NETTLETON		The scenic value of the land in segment 9E is far superior to that of 9D. Currently, as you travel Highway 78, there is an unobstructed view of the Owyhee Mountains. Route 9E would place a high voltage transmission line the length of the mountains, detracting from this gorgeous landscape and marring the countryside.	Your opposition to 9E and preference for Alternative 9D is noted. The BLM will continue to work with local interests to resolve routing issues, including visual impacts. The FEIS analyzes visual effects for Segment 9 in Section 3.2 and Appendix E.
101086	MATT BECK		Just a few comments. First this line goes directly through all but one of our pivots it would provide a 150ac corridor through the heart of our farm. At one time in all of our 15 pivots revolutions would pass under the transmission lines. We have already had issues w/ stray voltage at our feed lot affecting a big electric motor after burning up 3 motors our electritian said, "this has to be stray voltage." Idaho Power came out and checked thing out. the man was dressed w/ all sorts of protective clothing said he did nothing and there was no problem. Funny thing was we walked around the same spot everyday not even knowing there could be any harm to myself my fellow employees or even my children, but this guy was dressed w/ all sorts of electrical protective clothing. Since that day when he said, "nothing was wrong," We have never buried up another electric motor. Second, story happened this spring	We are sorry to hear about past issues with stray voltage and the horrible accident at your acquaintance's house. The FEIS addresses concerns with stray voltage and public safety in Section 3.21 and 3.22 of the FEIS, including protection measures to avoid and reduce impacts. The Proponents would have programs in place to provide on-site testing and education to address these concerns. Routing has also been designed to avoid and minimize safety hazards. For impacts to agricultural operations, please refer to Section 3.18 and Appendix K of the FEIS. Any individual losses would be negotiated in the easement acquisition process with the Proponents. Decisions about siting on private land will be made through the state and county permitting process, not by BLM.

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			one of our business acquaintances had his house electrified tens of thousands of volts coming from Idaho Power lines just after he had put his kids on the bus and he him self headed to work. His wife was luckily still at a family members house in Utah and was not present at the home at the time of the surge that made his home into a death trap inferno. He is still waiting for answers still not a home to call home. The problem w/ these two stories is the IDAHO POWER does not like to accept their mistakes I do not trust in them these lines are dangerous and they want to put them in our back yards so they are not dangerous for the birds. My job is already dangerous everyday I deal w/ electricity and pivots, I feel these lines will make each day that I and the other thousands of farm workers days more dangerous. they are said to be safe, but w/ the track record of Idaho Power if something was to go bad they would never take the blame. They would rather see you suffer or even die than take the blame for their mistakes. The 5 county task force has made a corridor for the project w/ what we feel has the least impact on our Agricultural counties take thier advice and put the line on the Idaho Utah border.	
101086	MATT BECK		From the BLM map I believe the South route is Alternative 7K. this would affect less people and put the line on more public land and w/ less tilled land and also less population. The forcus seems to be on animals rather than people I worry for my children my feelow employees and myselfs safety. 90% of the time nothing will happen It is the 10% of the time when problems do happen and we hear nothing about them and Idaho Power Says, "didn't find any problems." I am not willing to take the risk and invite them into my back yard!	We appreciate your concerns. Safety issues have been assessed in detail in Section 3.22 of the FEIS. The BLM does not have the authority to permit projects on private lands. This is up to the state and county permitting processes. The county would also be responsible for mitigation requirements in the vicinity of private residents. Please refer to Section 2.4.1.1 for the reasons the BLM was unable to select Alternative 7K as its preferred alternative.
101087	LAWRENCE B FOX		I would like to see the gateway towers made as un-friendly to raptors as possible. Just this week a officer from IDFG was here to collect a golden eagle who's foot had become caught in the lattice style framing of the powerline towers that they use for nesting and hunting perces. We used to have a good population of sage grouse, now they are gone since the eagles moved in and made use of the existing powerline towers that bi-sected the grouse strutting grounds. The Gateway project will cross right through the best of the sharp tail Leks on my ranch and I would hate to see them dissappear also. By building the powerline the habitat on the ground and feed for grouse will not change but I am afraid that the constant hunting pressure from above will be more than they can stand to maintain a population. If possible please build the towers or put something on them so that the eagles are unable to use them.	The FEIS includes the following mitigation requirement to deter raptor perching: TESWL-1. "H-frame structures shall be equipped with anti-perch devices to reduce raven and raptor use, and limit predation opportunities on special status prey species."
101088	JOHN W & BARBARA S JONES		After much Thought I have come to conclusion that the new powerlines should go next to old ones 9D. less impact for new roads and Tower Pads.	Your preference for Alternative 9E is noted. The BLM will continue to work with local stakeholders to seek a consensus resolution to routing issues.

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101089	JAMES WILSON		<p>I suggest that the line be routed in the Snake River Birds of Prey as to Segment 9D. It is endorsed by the Owyhee County Commissioners and keeps the line out of privately owned property. This route parallels the existing 138 kv line already located there and the road constructed there by stimulus funds.</p> <p>Please do not route through private-owned land. There is plenty of federal land available.</p>	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues.
101090	PAUL NETTLETON		<p>I am totally and adamantly opposed to alternative 9E. As a member of the local working group of the Endangered Candidate Species of the Greater Sage Grouse, alt 9E will likely adversely affect sage grouse populations. Its close proximity to sage grouse leks, nesting, and brood-rearing areas, will attract raptors and ravens and will lead to greater sage grouse predation. Nest failure is an important factor in declining sage grouse populations and BLM's own data shows that sage grouse nests within 10 miles of transmission lines are easily accessible to ravens who perch, nest and roost on the towers. Perch deterrents have proved unsuccessful. It would be far better to choose alt. 9D as originally proposed by the Owyhee Task Force and accepted by local BLM and project officials. (Over)</p> <p>This alternative (9-D) would run adjacent to an existing 138kw transmission line along an existing road through the snake river birds of prey area (SRBOP). It would be much preferable to attract raptor and ravens to the cheat grass areas on SRBOP where they can feed on plentiful ground squirrels than to attract them to the shrub areas that serve as sage grouse habitat. Legislation establishing the SRBOP directed BLM management to allow for "diverse appropriate uses of lands in the area to the extent consistent with maintenance and enhancement of raptor populations and habitats. BLM's own data shows that alt 9-D as originally proposed with a crossing of snake river just up stream from swan falls, would be compatible with maintaining and enhancing raptors while having no effect on sage grouse.</p> <p>I urge you to adopt alternative 9-D as the final route through this area.</p>	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.
101091	MARCY PETERSON		<p>The people of Owyhee County are very concerned that this Two mile wide energy corridor is being considered to be routed over the main population and most of the private property in our county. People have crowded local community halls for the last few years in strong protest against having a 2 mile wide corridor coming across so much private property ESPECIALLY WHEN there is a so much better route on the north side of the snake river. it is not that we are against energy. It is that we do not want to live under/in an energy corridor.</p> <p>People in Owyhee County are very united and are taking a strong stand against this Two mile wide corridor coming over and through our property. There is very little property in our county which is not government ground! The energy corridor would be devastating to the people and tax payers of our County. Our Owyhee County</p>	Your concerns about the BLM's Preferred Route are noted. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9 of the Project.

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			Commissioners are all firmly behind the people of the County and they have sent you at least one letter, maybe more, stating that your energy corridor is unacceptable to come over our private property, south of the snake river. I have not heard one person who was not very upset or concerned about both of your southern (possible) routes in Owyhee County. Even our State Senators and Representatives have supported us against your projected Southern Routes through Owyhee County. You should have their letters on file. Governor Butch Otter supports us as you know. It is not likely that any of us will change our opinions. Many of us have put much time, effort and money to protect or environment. As for your most southern alternative possible route in Owyhee County - where the sage grouse live - plus the economics in maintaining that route. I can't believe that one would honestly consider this most southern route.	
101092	ROXANNE BECK		<p>I am writing in response to this project and want to address my concerns. There will be a huge chunk of this project run right through our farm and stand very close to my home. I have a young family. All my children are age 7 or younger. I also would like to have more children in the future. I only state this personal information due to the worries it causes me and the safety of my children. I can no longer let them play outside or go farm with their father due to the fact that these structures are all around our pivots and feedlot. You are building a very unsafe playground for innocent children in the Cassia County area. It is taking away valuable learning windows for the children to learn on the farm. But yet the sage grouse and many other animals are much more important to saving than human beings. Whatever happened to helping the human population succeed. Now it is how can we save the animals. The animals don't build a nation, people do. I also take into consideration my health. These lines play a very important role in our health. I was told by a representative for the project, it will only be a problem if you are around them everyday. We can't avoid them when they border our home and pivots in which we are around EVERYDAY.</p> <p>In conclusion, I want the power lines rerouted to the alternative routes. Lets put human beings first over the animals. We are economically trying to work for our well being. It may cost a little more but we are protecting future generations, which protects our nation. Let's get back to taking care of the people first, which proves to always be a positive outcome.</p> <p>The alternative route I would like to see for this project is the feasible alternative route that runs along the Utah Idaho border.</p>	It appears the comment is in support of Alternative 7K. Your concerns are noted and have been assessed in Section 3.22 of the FEIS, Public Safety. Impacts to agricultural lands are discussed in Section 3.18 of the FEIS. The BLM does not have the authority to site projects on private lands. The Proponents will need to complete the state and county permitting processes, as well as negotiate with individual landowners to compensate for losses. The county also would be responsible for setting siting standards in the vicinity of residences, and along agricultural lands. Please refer to Section 2.4.1.1 for the reasons the BLM was unable to select Alternative 7K as its preferred alternative for federal lands.
101093	BLAIR RITCHIE		The proposed project states that each proposed project is to lessen affects on sagebrush, wildlife, or BLM land. But what is the powerline for? To better facilitate the native wildlife or the native citizens of Idaho? I am not saying that the wildlife of BLM land is not important!	The FEIS acknowledges adverse effects to agricultural lands in Segment 7, which are analyzed in Section 3.4, 3.18, and Chapter 4 (Cumulative Effects) of the FEIS. Section 3.22 addresses public safety considerations, and does not find an increased risk of fatal

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			But putting the powerlines straight through farmland will affect livestock, crop production, and hazards to farmers if these powerlines go in, farmers and livestock, as well as children playing, are at greater risk of death all because sagebrush and BLM land does not want to be affected. Using the feasible alternative route still allows for the powerline to be used without running it through farms and land that we call home. Now the once scenic oasis will become an industrial factory and take away what Idaho thrives to continue into the future and future generations. The feasible alternative route allows for both power and safety to be the top priority. I want to bring others to know of the memories I have seen and lived in this great state, without the giant powerlines taking away work, animal livestock, and the years and decades of hardwork these farmers, citizens, and loyal idahoans have sweat to build and leave behind. I have been here for some time, and hope that you will consider the feasible route to put in the powerline.	injuries due to powerline construction and operation. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM lacks the authority to permit a ROW across private lands.
101094	VERNITA TALBOTT, TED TALBOTT		As we already commented before, Hagerman Valley is a very beautiful part of Idaho. We have spring water, wild life, great weather for gardens and fruit, especially watermelons, access to fishing and hunting, etc. To us, it is a "heavenly" place to live. We already have much more than our share of huge towers and power lines in this valley because of the hydroelectric power plants on the Snake River. We don't want any more!	This comment is noted.
101094	VERNITA TALBOTT, TED TALBOTT		Not only is the aesthetic value of our property diminishing but people including ourselves, are fearful of the health consequences of living near the power lines. At the last BLM meeting we attended in Twin Falls, I mentioned that the grouse should not come before the human rights. I was told not to harp on this or we will be in the same predicament as Oregon's logging and the Spotted Owl. Are the environment groups in charge of running this country now? Please choose the alternate route that does not go through Hagerman Valley.	The FEIS discusses effects to visual resources and public safety considerations in Sections 3.2 and 3.22, respectively. Effects on health are discussed in Section 3.31 and 3.22. The BLM has sought and will continue to seek input on resolving siting issues in Segments 8 and 9 of the project from all local stakeholders.
101095	DONNA BENNETT	OCNRC - OCSGLWG	Route 9-D will minimally impact existing Sage-Grouse lek routes in Owyhee County, several of which are within a few miles of the Proposed Preferred Route, 9-E. Sage Grouse avoid any type of infrastructure, especially the type that is over head, such as the transmission towers because of perching opportunities for avian predators. This is the reason Sage-Grouse leks and nesting areas are located in areas of low sage and no trees.	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.
101095	DONNA BENNETT	OCNRC - OCSGLWG	Alternative Route D goes across the Morley Nelson Birds of Prey NCA. This area is hardly void of infrastructure, in fact, this whole area has been used and has had infrastructure, since the early settlers. The early routes from the Grand View area to Boise went out through the heart of the NCA. Old roads leave the canyons and were at that time heavily traveled to the Boise Area. There are currently four transmission lines across this area and one old line that has been decommissioned and is being left for nesting habitat for the birds of prey. An old pole line road, named the Baja Road, which has been recently	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.

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			improved, travels the length of the NCA from Highway 67 to the Swan Falls Road near Kuna. This road could be used in the structure of the new transmission line with minimal impact to the NCA.	
101095	DONNA BENNETT	OCNRC - OCSGLWG	<p>I reside just under the rim of the NCA Birds of Prey. Even though the Alternative 9-D would be within eyesight of my residence and the Grand View Valley, I would still prefer to see it in the Morley Nelson Birds of Prey NCA which already has negative visual impact to the public.</p> <p>Alternate Route 9-E is devoid of any negative visual impact. A traveler on Highway 78 has only to look to the Owyhee Mountains and see nothing but nature's view. To spoil this view with huge towers and lines would be a travesty.</p>	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.
101095	DONNA BENNETT	OCNRC - OCSGLWG	<p>Route 9-D will impact only a few private lands, as opposed to Preferred Route 9-E. Those private land holders are willing to let the transmission towers go across their lands.</p> <p>Preferred Route 9-E impacts the private lands of farmers and ranchers the length of the Bruneau, Grand View, Oreana, and Murphy areas. To the casual observer, this seems to be minimal, but to the farmers and ranchers, to have these towers go across their farms is a great disruption of their livelihood. Most of the farms within this route use pivot irrigation, which is not compatible with the transmission towers. Most of these pivots are in excess of 1/4 to 1/2 miles in diameter. The siting of these towers will disrupt the function of these pivots, making irrigation difficult.</p>	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. Effects to agricultural lands are discussed in Section 3.18 of the FEIS, including how towers would be sited to avoid and minimize interruption to pivot operations. Figure 3.18-2 shows how towers would be sited in agricultural lands. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.
101096	SCOTT J CLARK	CLARK'S CRYSTAL SPRING RANCH	To the concerned Citizens of the Gateway West Project. I do hereby thank you and applaud you for your tremendous efforts to greatly enhance and improve the electrical infrastructure across Southern Idaho and Wyoming. As being honored to have a voice in this decision, my hope and goal is that Alternative 9D, G will be selected and utilized for infrastructure improvement (there north of Bruneau). My reason for this is then the line will run adjacent to Idaho Energy Complex site where several million dollars were spent on a premium sight for the possible building of the 1.6 giga watt nuclear power plant. A second phase could increase power production to 3.2 giga watts, which, I believe, could make good use of the 500 kilovolt line that will form the Gateway West project. An active \$750,000 weather tower was installed to monitor the site, as well as a second tower, and close to a dozen test wells. One of the current owners of the site has been applauded by Simplot for investing Thirty-five million dollars into the Hey burn potato processing plant, demonstrating his vigor towards industrial development. Therefore, I consider this not only a viable, more than viable, a probable project, and that it will be greatly enhanced by selecting Alternative 9D, G as a route for the 500 kilovolt project. Thank you.	The BLM concluded that the ground disturbance and new access roads associated with 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.

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101097	THOMAS DAYLEY		There appears to be a common theme supported by the individual citizens, the cities, the counties and the State of Idaho, particularly as it relates to the small segment impacting my local area of interest: retaining the originally agreed upon alignment of Segment 8 is in the best interests of the community impacted here. I am also aware that you have received detailed comments from the various entities impacted including individual citizens, cities, counties and the State of Idaho and will not attempt to restate that data. Please do give careful consideration to those details as you make this very important decision. It does seem imperative that BLM not ignore the input of property owners, individual citizens, indeed the numerous stakeholders who have dedicated years in a collaborative effort. If this were to occur, it would potentially damage the scenic values of our land, unnecessarily impact agricultural operations, impose additional costs on the private citizens, disrupt on-going city plans, as well as negatively influence the finances of agencies of government at several levels.	The BLM concluded that the Proposed Route in Segment 8 would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 8.
101097	THOMAS DAYLEY		Utilizing existing alignment of the transmission lines seems financially and operationally prudent. Also, although the report is extensive, it does not seem to have given adequate consideration to the extensive BLM and State of Idaho work regarding Sage Grouse. Even though your decision can only be made regarding the use of public lands, your decision will have a dramatic and direct impact on how private land can and will ultimately be used. For example, it appears the FEIS does not adequately consider how the decisions will fiscally and physically impact the cities of Kuna and Melba. It is my understanding that the federal public lands were set aside for general public use. In the land use mix, private, local and state entities in Idaho have very limited land. It seems to me that when large tracts of federal public land are available, as is the case with the decision under consideration, every care should be given to using those lands for this sort of important public purposes. BLM indirect or direct restriction of the several necessary uses of the very limited private and state lands seems to violate the spirit if not the essence of why the federal government originally dedicated those lands to state and private use. I would respectfully request that this, and every federal agency, when considering the use of their 63% of the State of Idaho, give due deference to private and state land by allowing the remaining limited land to be effectively managed as designed: a trust for the education of our children, to protect fish and wildlife for our quality of life, to preserve our scenic areas, and to expand the private economic base in order to maintain an adequate standard of living for our citizens. In short, the BLM should use federal land for the Gateway Project to the maximum extent possible thus limiting the negative impact on the remaining very small tracts of state and private land.	More than half of the Gateway West alignment would be on public lands, most of that on BLM-managed lands. The BLM concluded that the proposed route in Segment 8 would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 8.

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101098	CL "BUTCH" OTTER	STATE OF IDAHO, OFFICE OF THE GOVERNOR	The enclosed response identifies several points of inconsistency between the BLM's Preferred Alternative for the proposed project and State laws, plans, policies and programs. This response is specific to the Preferred Alternative as it relates to Idaho and its political subdivisions, and contains recommendations designed to achieve consistency. The Governor's Consistency Review is an important part of the process for the creation, revision and amendment of BLM National Environmental Policy Act reviewed plans, as it represents the final opportunity to achieve a real planning and plan implementation partnership between the state and the BLM. Pursuant to the Federal Land Policy and Management Act (FLPMA), and BLM regulations, BLM is required to accept the recommendations if they "provide for a reasonable balance between the national interest and the state's interest."2 Idaho and the BLM, through hard work and unbiased review of the facts, have been able to achieve consistency on many planning issues in the past.	The BLM has appreciated working cooperatively with the State of Idaho for the past several years to find routes that would meet both federal and state laws and policies. We will continue to work with your office and others in local government to resolve remaining issues in Segments 8 and 9 of the project, wherever possible. In regard to consistency recommendations, neither FLPMA nor the BLM regulation cited in the comment requires the BLM to accept the Governor's recommendations. The BLM retains the discretion to accept or reject recommendations, with reasons given for accepting or rejecting them provided in writing to the Governor and published in the Federal Register. It is our intent to strive for consistency to the greatest extent possible.
101098	CL "BUTCH" OTTER	STATE OF IDAHO, OFFICE OF THE GOVERNOR	Sage-Grouse I submitted an alternative to BLM for inclusion in the National Greater Sage-Grouse Planning Strategy (Governor's Alternative). The Governor's Alternative was developed utilizing a diverse group of stakeholders including individuals representing agricultural interests, energy or mineral development interests, local sage-grouse working groups, recognized environmental organizations, recognized wildlife or sportsmen's groups, State elected officials, county elected officials, or representatives of the public at large (collectively the sage-grouse task force). The sage-grouse task force was assisted by State and federal agencies, including the Idaho Department of Fish and Game, Idaho Office of Species Conservation, Idaho Department of Lands, Idaho Office of Energy Resources, Idaho State Department of Agriculture, Idaho Department of Parks and Recreation, United States Fish and Wildlife Service, the Bureau of Land Management and the Natural Resources Conservation Services. The sage-grouse task force was formed in response to an invitation from the Secretary of Interior. As you know, the Governor's Alternative has important differentiations for sage-grouse management and is a more accurate description of potential sage-grouse habitat than the alternative offered by BLM and incorporated into the Gateway West Final EIS.4 BLM's failure to recognize the Governor's Alternative is highlighted by its willingness to recognize and adhere to the Greater Sage-Grouse Core Area Protection from Wyoming's gubernatorial Executive Order 2011-5.5 BLM's failure to incorporate the Governor's Alternative into the Gateway West Final EIS is problematic and inconsistent with Idaho's laws, plans, policies and programs. Any action by BLM that contradicts the Governor's Alternative is inconsistent with Idaho Code. Specifically, the State asserts primacy over the management of its fish and wildlife.6 The State requests that BLM recognize and adhere to the Governor's Alternative and incorporate it into any decisions regarding the Gateway West	The Task Force recommendations are addressed in FEIS section 3.11.1.3. As you know, the Governor's Alternative was finalized in September 2012. This was provided to BLM for inclusion as an alternative in the current national sage-grouse EIS process aimed at updating the BLM's RMPs (as part of the BLM's National Greater Sage-Grouse Planning Strategy and Instruction Memorandum 2012-044). As a decision on an alternative for BLM's National Greater Sage-Grouse Planning Strategy/RMP amendment will not be made until later in 2014, the potential new sage-grouse habitat designations from the Task Force were not incorporated into the FEIS analysis. The BLM recognizes that it does not have authority to permit the Project on state lands or any other lands not under its jurisdiction. We are committed to continuing to work with your office and stakeholders to find resolution to the most debated portions of the project in Idaho.

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			Transmission Line Project. This includes, but is not limited to, recognition of habitat designations and management practices for building infrastructure in sage-grouse habitat.	
101098	CL "BUTCH" OTTER	STATE OF IDAHO, OFFICE OF THE GOVERNOR	Local Land Use Planning Act (LLUPA) LLUPA was passed in by the Idaho State Legislature in 1975 and is codified in Title 67, Chapter 65 of Idaho Code. LLUPA allocates responsibility for zoning and planning to local governments by requiring the development of a comprehensive plan. According to code, "the plan shall include all land within the jurisdiction of the governing board. The plan shall consider previous and existing conditions, trends, desirable goals and objectives or desirable future situations for each planning component." BLM, in the Final EIS, acknowledges that LLUPA requires every city and county to establish local planning procedures and land use regulations. ⁸ Cassia County, Owyhee County and Power County have either a special use permitting process or Electrical Transmission Corridors that were enacted by ordinance pursuant to LLUPA. These ordinances affect the siting of transmission lines in those jurisdictions. However, BLM failed to acknowledge or incorporate any specific information that would recognize these ordinances in the Final EIS. By ignoring them, BLM acted in contravention of State and local policies and authorities granted under LLUPA. The Final EIS states that BLM's Preferred Alternative for Route 8 is 8B, which affects both the City of Kuna and the City of Melba and is inconsistent with their comprehensive plans. If this route is carried forward to the Record of Decision, Kuna will suffer significant harm in attempting to build and develop real estate within its Area of Impact. ⁹ Idaho law allows for Areas of City Impact in order to plan for future development. ¹⁰ Moreover, BLM's Preferred Alternative conflicts with Melba's Comprehensive Plan because the city's natural growth will be directly in the path of proposed transmission lines if Route 8B is constructed where it is currently proposed. In fact, Segment 8B's study corridor bisects Melba's current city limits. Comprehensive land use planning and growth management is central to Idaho's social and economic stability. While the State recognizes the importance of energy infrastructure development, it is important that BLM recognizes the need to balance that development with other elements unique to local jurisdictions by placing such infrastructure on federal land to the greatest extent practicable. Idaho requests that BLM reconsider its decision to place such significant portions of its Preferred Alternative in areas that severely affect the local economy.	The BLM is not required to make management decisions for federal lands based on local plans; federal law does require that the BLM coordinate with local governments. Refer to Chapters 1 and 5 of the FEIS for a list of meetings held with local governments and other stakeholders over the past several years. The federal agencies will continue to work with local government to resolve local concerns where possible. The BLM has coordinated with state and local governments throughout the Project and will continue to do so.
101098	CL "BUTCH" OTTER	STATE OF IDAHO, OFFICE OF THE GOVERNOR	Private Property It is a long-established policy in Idaho to protect the private property rights of the citizens in our state. BLM's Preferred Alternative for the Gateway West Transmission Line project significantly infringes on private property in Ada, Canyon, Cassia, Owyhee and Power counties. This interference includes harm to high-quality agricultural lands and future development. Idaho's laws, policies	The BLM and the Forest Service closely cooperated with local governments in developing alternative routes for the EIS. This is well documented in the project record. The location of the line on federal lands directly affects the location on adjacent private land. However, when there are miles of private land between federal parcel, the local governments have flexibility on routing.

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			and plans are intended to protect private property from unjust and unnecessary interference. While BLM only has authority to route transmission lines on federal land, it is unrealistic to claim that those decisions do not directly affect where transmission lines will be built on private property. The reality is that when BLM and USFS grant rights-of-way on public land, their decisions dictate the location of the transmission line on private property. This is particularly challenging when BLM and USFS refuse to cooperate in siting energy infrastructure on federal land, as is the case with BLM's Preferred Alternative in several different areas. It is the policy of Idaho to encourage the protection of prime agricultural, forestry and mining lands and land uses for production of food, fiber and minerals, as well as the economic benefits they provide to the community. There is a simple way for BLM to resolve issues surrounding the inconsistencies with Idaho's laws, plans, policies and programs - it must reconsider its Preferred Alternative and place energy infrastructure on federal land to the greatest extent practicable. At a minimum, the State supports BLM reevaluating its Preferred Alternatives for Segments 8 and 9 to assess the decision to ignore the consensus routes through the Snake River Birds of Prey Area.	The federal agencies will continue to work with local government to resolve local concerns where possible. The BLM is implementing a phased decision in order to provide additional time to work on issues associated with the NCA.
101099	DELORES STOKER		I am not in favor of the lines crossing some of the prime farmland in Cassia County. It seems unnecessary to cross through homes and yards, corrals with livestock, and fields covered with pivots used for irrigation. There is plenty of land in the southern part of Cassia County that is not farmed and it is very lightly populated. It would not be necessary to cut up farms. Prime farmland is selling for premium prices. Farmers are only compensated once while public land is compensated yearly with a lease.	The FEIS acknowledges adverse effects to agricultural lands in Cassia County, which are analyzed in Section 3.4, Section 3.18, Chapter 4 (Cumulative Effects), and Appendix K of the FEIS. It is up to the county to set standards for siting the line near residences, as well as through agricultural lands. The BLM has no authority to permit the project on private lands. The Proponents will need to complete the state and county permitting processes, and negotiate with individual landowners during the easement acquisition process to compensate for damages to agricultural operations.
101100	LARRY BETHKE		1) It has been asked of you to study the HVDC buried line, and you and have said NO because it was not feasible. How can you say it is not feasible without even studying the proposal without it not being studied by professional people? If you make a study of it and it is found not feasible then at least you can say it was studied and was or was not feasible. You are mandated to study the HVDC buried line. You are mandated to study BY LAW all possible alternatives.	Burying HVDC lines is considered in Section 2.6.3.4. The Conclusion (2.6.3.5) states: "Underground cable system installation has historically been justifiable in terms of cost and reliability only in urban or metropolitan areas, and for limited distances. Because of the high cost of an underground line compared to overhead 230-kV and 500-kV lines, unproven technology over long distances for 500-kV, reliability and reactive compensation issues for long installations, and increased land disturbance, the alternative of placing the 230-kV or 500-kV Gateway West lines underground as either AC or DC was not considered feasible for the Project." NEPA requires that the BLM study a reasonable range alternatives in detail, not every possible alternative in detail.

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101100	LARRY BETHKE		2) In past meetings with Power County you were asked to adopt Power County's alternative route proposals, NOT just study them. If you did study them you just did not adopt them with no reasons. Again Power County has been given siting authority by the STATE OF IDAHO. So listen to Power County as Power County does have the last word. Remember! Siting authority has precedent over Eminent Domain.	The BLM has worked cooperatively with Power County throughout the EIS process and has sought to address concerns regarding impacts. The reasons for BLM's preferred alternatives are detailed in Section 2.4.1.1 of the FEIS. The BLM has no authority to require the Shoshone-Bannock to allow Segment 5 to cross the Fort Hall Indian Reservation and it could not select Alternative 7K given the impacts to Preliminary Priority Habitat (PPH) for sage-grouse and other resource impacts.
101100	LARRY BETHKE		3) Please extend comment Period for another 90 Days	The BLM considered the request for an extended comment period but believes, based on the comments received, that 60 days was adequate for the public to respond with meaningful comments.
101100	LARRY BETHKE		4) The current route is not acceptable to Power County. Please meet with Power County to come to a conclusion satisfactory to all parties involved.	The BLM has coordinated with Power County throughout the EIS process and has worked to address concerns to the greatest extent possible. This decision only permits the Project on BLM-managed lands. The BLM lacks the authority to permit projects on private or state lands. The Proponents will need to work with the County to permit the line on private land.
101101	RICHARD & SUE FARNER		We have for the past 3 or 4 comments and meetings said that we want these lines to go thru Birds of Prey + BLM - Where the power lines already run - We support Segment 8 + Segment 9D	Your support is noted.
101102	RICHARD & SUE FARNER		We support Segment 8 and Segment 9D.	Your support is noted.
101103	JAMES AND MARYANN SLEGERS		As a dairy family for the last 40 years, 18 of which have been spent in Idaho, we are keenly aware of the negative aspects of transmission lines such as the proposed Gateway Project will bring with them. Cows and Farming do not mix with high voltage transmission lines. Encroaching into private land used mainly for farming and food production when a perfectly logical alternative exists is ludicrous.	The FEIS discusses effects to agricultural lands in Section 3.18 of the FEIS. The BLM will continue to work with local stakeholders to seek a consensus resolution to routing issues in Segments 8 and 9 of the project.
101103	JAMES AND MARYANN SLEGERS		We strongly support Segment 8 and Segment 9 D and oppose the BLM Preferred Routes (Private lands) as expressed in the Final Environmental Impact Statement. Please revisit BLM's decision and make the RIGHT choice.	Your preferences are noted. The BLM will continue to work with local stakeholders to seek a consensus resolution to routing issues in Segments 8 and 9 of the project.
101103	JAMES AND MARYANN SLEGERS		We strongly support Segment 8 and Segment 9 D and oppose the BLM Preferred Routes (Private lands) as expressed in the Final Environmental Impact Statement. Please revisit BLM's decision and make the RIGHT choice.	Your preferences are noted. The BLM will continue to work with local stakeholders to seek a consensus resolution to routing issues in Segments 8 and 9 of the project.
101104	BRETT HATFIELD		This project should be run through public lands not private. I am appalled that Birds are being placed above people. It is time that the government stop its strong arm politics, the people have spoken over + over that this project should be put on public lands. Or what is right for the people + that is built on public lands.	Your preferences are noted. The BLM will continue to work with local stakeholders to seek a consensus resolution to routing issues in Segments 8 and 9 of the project.
101105	MARCI HATFIELD		It's time to LISTEN to the people. This should be ran thru public land not private. We work hard to own + preserve our FREEDOM to own	Your preferences are noted. The BLM will continue to work with local stakeholders to seek a consensus resolution to routing issues

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			our property. Government needs to start work for + listening to the people the ones who are paying your salary, the one's who voted, listen to the honest not Governments GREED! P.S. What if this was your personal land You would be mad too.	in Segments 8 and 9 of the project.
101106	DANIEL AND DIANA BUTLER		My brother, Arthur Butler, and our families own and operate Spring Cove Ranch north and west of Bliss Idaho. (T 5 S, R 12 E, sec 21 and 28). Raising purebred Angus cattle and crops is our passion and livelihood. Outdoor recreation is also our passion and an important source of income as well. We were told that the preferred route for the new Gateway West transmission line is adjacent to the existing line which goes through section 21. There are several reasons why we would like you to choose a different route for the new line. 1: Farming: The line that is there now is very disruptive to our farming operations and we certainly don't want to add to our problems. We understand that the span length of the new line would be much greater, which is good, but tower placement would be critical. In fact, it would be extremely beneficial if the old wooden structures which need replaced anyway could be upgraded to longer spans. We also have several pivots planned for this area and we do not want our plans disrupted. See attached maps. See attachment A.	Siting on private lands, including on agricultural lands, will be decided through the state and county permitting processes. The BLM does not have the authority to permit the project on private lands. However, the FEIS analyzes and acknowledges impacts to agricultural lands in Section 3.4, Section 3.18, Chapter 4, and Appendix K. The BLM will continue to work with local government and stakeholders to resolve routing issues in Segment 8 of the Project.
101106	DANIEL AND DIANA BUTLER		2: Cultural: The proposed route crosses a multitude of cultural resources on our property. Most of the route crosses an old floodplain, the perimeter of which is littered with obsidian flakes, grinding bowls, pestles, projectile points and pottery shards. The north branch of the Oregon Trail - Kelton Road crosses this area as well. A project survey for archeological concerns was conducted by a Gateway west team on this property. Please review this survey for documentation of my comments.	Siting on private lands, including on agricultural lands, will be decided through the state and county permitting processes. The BLM does not have the authority to permit the Project on private lands. However, the FEIS analyzes and acknowledges impacts to agricultural lands in Sections 3.4, 3.18, Chapter 4, and Appendix K. Impacts to cultural resources are assessed in Section 3.3. The BLM will continue to work with local government and stakeholders to resolve routing issues in Segment 8 of the Project.
101106	DANIEL AND DIANA BUTLER		3: Wildlife: This area is rich with a variety of wildlife. Migrating waterfowl are abundant here in the spring and fall. In fact we have contracted with Ducks Unlimited to enhance habitat for wintering waterfowl. Upland game birds also call this home. These include pheasant, quail, dove, and sage grouse. We work with Pheasants Forever or on our own, to enhance upland game habitat. This includes 6 to 12 acres of food plots which are established for wildlife. Deer, elk and antelope are abundant as well. They make extensive use of the alfalfa and corn as well as the creek bottom and wetlands there are 2000 Sandhill Cranes who call this area home from February 19th to April 19th each year. This is unique, I don't know of any other place in southern Idaho where cranes roost in such abundance. See comments submitted by Ducks Unlimited and US Fish and Wildlife service (letters no. 100272 and 100345 for the 2011 draft EIS). Ducks Unlimited has also submitted comments on behalf of Spring Cove Ranch in regard to the FEIS. A Gateway West wildlife survey was conducted as well. Will you please review this survey?	Siting on private lands, including on agricultural lands, will be decided through the state and county permitting processes. The BLM does not have the authority to permit the project on private lands. However, the FEIS analyzes and acknowledges impacts to wildlife in Sections 3.10 and 3.11, including the results of field surveys. The BLM will continue to work with local government and stakeholders to resolve routing issues in Segment 8 of the Project.

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101106	DANIEL AND DIANA BUTLER		4: Recreation: Our ranch provides a host of recreational activities. Our family has used this area to hunt, fish, hike, bike, and horseback ride for over 100 years. My brother and I have worked hard to enhance this experience. We have developed 40 acres of ponds and wetlands, and established a fishery for bass, bluegill, trout, and sturgeon. We have a private pond permit with Idaho Fish & Game. We also have an access yes contract with Idaho Fish & Game to allow fishing, upland game and big game hunting by the public on our property. I also have an outfitters license(#16091, Spring Cove Outfitters) for guiding deer, elk, antelope and bear hunts as well as trail rides and fishing trips. Spring Cove Ranch is headquarters for this business and numerous hunts occur here, especially youth hunts for deer and elk. In the fall and winter waterfowl hunting is a big deal at Spring Cove Ranch. Even though waterfowl hunting is not in our access yes contract, we allow approximately 30 people to hunt here, and again youth hunts are given preference and are common. Nearly all of this activity occurs under the proposed route of the transmission line. See attached private pond permit and Access Yes contract information. See attachment B	We appreciate your efforts to enhance recreational opportunities on your property. Siting on private lands, including on agricultural lands, will be decided through the state and county permitting processes. The BLM does not have the authority to permit the project on private lands. The FEIS discusses impacts to recreation in Section 3.17. The BLM will continue to work with local government and stakeholders to resolve routing issues in Segment 8 of the Project.
101106	DANIEL AND DIANA BUTLER		For all of the reasons above, especially recreation, we ask that you would move the location of the line so that it does not impact us so severely. T 5 S, R 12 E, sec 21 and 28	The BLM will continue to work with local stakeholders to seek a consensus resolution to siting issues in Segment 8 of the Project.
101107	JANAN NEILSON		I have not mentioned visual impact, negative effects on animal, human, and plant health, or sage grouse habitat which represent still more "needs". The current plan for Gateway West is shortsighted and lacks balance. Plainly, the Gateway West Project needs to be returned to "the drawing board" and rerouted in a manner that that allows ALL needs to be met.	The BLM has sought to minimize adverse impacts of the project in its selection of preferred alternatives and through numerous avoidance, minimization, and mitigation measures.
101107	JANAN NEILSON		Statement of the part or parts of the plan being protested: Chapter: Section: Page: EIS pp. 1-24 (or) Map: A concise statement explaining why the State Director's decisions is believed to be wrong: The Gateway West Project as proposed by BLM is for the said purpose of meeting an increased demand for electricity. However, The Idaho Power 2011 Integrated Resource Plan (IRP) does not forecast any increased demand for electricity or renewable energy; in fact Idaho Power customer needs will be met by the Boardman to Hemmingway Project for the foreseeable future. It appears clear that the true purpose of the Gateway West Project is not to serve Idaho Power's service needs, but to be part of a transmission grid, for customers in other locations.	As stated in Section 1.2 of the FEIS, "Under Federal Energy Regulatory Commission (FERC) tariff requirements, utilities must plan, design, construct, operate, and maintain an adequate electric transmission system that meets not only the customers' energy demands (measured in megawatt-hours) but also meet the customer's peak load demands (measured in megawatts). Both are important in determining the need for the project." Chapter 1 goes on to explain why these upgrades are needed. It also discusses federal oversight of the proposal by FERC. The BLM relies on DOE and FERC to evaluate the Proponents' objectives.
101107	JANAN NEILSON		Even if the need for more electricity in the state could be justified, that need should be balanced with other needs. Obviously farmers need their land for production, local economies need the circulation of dollars that support the farmer's crop production, and the world at large needs the food supply. For example, The High Level Expert Forum	Agricultural impacts are addressed in Sections 3.4, 3.18, and Appendix K of the FEIS. No significant effects to food supply are expected.

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			projects" that feeding a world population of 9.1 billion people in 2050 would require raising overall food production by some 70 percent between 2005/07 and 2050"-and this must be done with an ever decreasing rural population. With this need in mind, how can Gateway West justify 80% of segments 7 and 8 passing through private agricultural land? Idaho has a high percentage of federal land, not in agricultural production that could be used for this project, thus allowing both the need for electricity and the need for crop production to be met. Perhaps there is a mistaken notion among decision makers that land can just be put into production as needed. Not all land is suited to agricultural production; the land that is suitable must be cleared and cultivated for several years before it becomes fertile. Anyone who has been involved in "breaking out" ground recognizes this is no small matter. "The world has the resources and technology to eradicate hunger. It needs to mobilize political will and build the necessary institutions to ensure that key decisions on investment levels and allocation as well as on agricultural and food security policies are taken with the goal of hunger eradication in mind."	
101107	JANAN NEILSON		Your interest in filing this protest (how will you be adversely affected by the approval or amendment of this plan?):If this project follows the current plan I will have to deal with long and short range economic impact to local economy, plus visual impact, and health implications of high powered lines.	Please refer to the BLM's response to the Protest (Appendix K to the ROD).
101108	BARBARA CHANEY, KATHLEEN HENDRICKS, JASON PYRON, JULIE REEVES, MATTHEW STUBER	US FISH AND WILDLIFE SERVICE, WYOMING ECOLOGICAL SERVICES, US FISH AND WILDLIFE SERVICE, IDAHO FISH AND WILDLIFE OFFICE	Jason Pyron - IFWO -- General Comment: The Greater Sage-grouse (<i>Centrocercus urophasianus</i>) Conservation Objectives: Final Report (Report) was completed in February, 2013. Because the Report is a result of collaboration among experts in sage-grouse ecology, we strongly recommend that your final decision meet and incorporate the objectives and measures identified in the Report. The strong science-based nature of the Report will assist the BLM in ensuring that this project does not negatively affect sage-grouse to such a degree that the established objectives cannot be met.	The Report is a guidance document, and as stated on page ii of the Report, the "identification of conservation objectives and measures [in the Report] does not create a legal obligation beyond existing legal requirements", and that "[n]othing in this plan should be construed as a commitment or requirement." However, the BLM has incorporated many of the suggestions in the Report into the analysis for the Gateway West Project. The Report defined Priority Areas for Conservation (PACs) which represent "key areas that the states have identified as crucial to ensure adequate representation, redundancy, and resilience for conservation of its associated population or populations." For the most part, COAs are coincident with PPH in Idaho and Core areas in Wyoming. The BLM's Preferred Alternative for the Gateway West Project largely avoids these PACs (with only a few exceptions due to constraints related to other resources), and is routed in compliance with the Wyoming Governor's corridor through Core areas in Wyoming. The COT report made multiple recommendations related to power-lines, which are discussed below. The EIS considered the option of burying the power-line, but determined that this was not a feasible option (see section 2.6.3). The Project was co-located (consolidated) with existing disturbances and power line ROWs to the extent practical. The

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				Project contains measures to reduce the risk of non-native invasive plant species spread/establishment (see EPMs OM-13; OM-14 through 15; OM-20; REC-1 through REC-17; VEG-4; VEG-5; VEG-8; VEG-9; and WEED-1 through 4), risk of fire (see EPMs FIRE-1 through FIRE-9), public use of access roads (see EPM OM-6), and use of the line by raptors and ravens (see EPMs WILD-12; TESWL-1; and TESWL-15). The BLM and cooperating agencies have required the Proponents to provide mitigation for impacts to sage-grouse and their habitats (see Appendix C and J), which includes recommendations to removal juniper from potential sage-grouse habitats as well as fences that have a high risk for grouse collisions.
101108	BARBARA CHANEY, KATHLEEN HENDRICKS, JASON PYRON, JULIE REEVES, MATTHEW STUBER	US FISH AND WILDLIFE SERVICE, WYOMING ECOLOGICAL SERVICES, US FISH AND WILDLIFE SERVICE, IDAHO FISH AND WILDLIFE OFFICE	Kathleen Hendricks - IFWO -- The Service's Idaho Fish and Wildlife Office (IFWO) has reviewed the May 30, 2013, draft mitigation plan proposal submitted by Rocky Mountain Power and Idaho Power to offset impacts to Greater Sage-grouse by the Gateway West transmission line project. This proposal has separate mitigation plans for Idaho and Wyoming. We are aware that the Final Environment Impact Statement (FEIS) acknowledges that the project will have both direct and indirect impacts and that such impacts will need to be addressed through avoidance, minimization and mitigation efforts. However, the Habitat Equivalency Analysis model used to develop the mitigation plan and presented in the FEIS only analyzed the direct impacts to sage-grouse and not the indirect impacts. The IFWO strongly recommends that the BLM collaborate with the IFWO and the Idaho Department of Fish and Game (IDFG) ensure that all impacts (i.e., direct and indirect) are mitigated pursuant to the BLM IM 2012-043 which implements the December 21, 2011 National Technical Team Report. Additionally, the IFWO is currently working with the BLM and Idaho state agencies to jointly develop technical comments and suggestions to improve the draft mitigation plan for the Idaho portion of the project that will be submitted to the project proponents as soon as possible. We understand that a completed mitigation plan is not required prior to the record of decision and right-of-way grant approval. Therefore we recommend that a final mitigation plan, jointly approved of by the IFWO, IDFG and BLM, be a condition of the right-of-way grant and that this commitment be stated in the Record of Decision.	Additional mitigation is being developed, including mitigation for indirect effects on sage-grouse and migratory birds.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-143 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # OM-4: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to migratory birds, sensitive and/or listed species will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands.

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			does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-147 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # OM-22: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts sensitive and/or listed plant species will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-148 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # OM-25: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to sensitive and/or listed plant species will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except state and private lands along segments 4, 6, 7, and 10 in Idaho.

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			entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-148 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # OM-26: project proponent should implement this EPM regardless of land ownership. No reason not to...	The BLM agrees with your recommendation, but does not have the authority to require this.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-157 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # VEG-2: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to migratory birds, sensitive and/or listed species will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except state and private lands along Segments 4, 5, 7, and 10 in Idaho.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-160 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- NEW EPM # WEED-1: determining appropriate seed mix for an area and preventing the establishment of noxious weeds / invasive species is a good practice. Recommend project proponent implement this practice on all lands, regardless of ownership.	The BLM agrees with your recommendation, but does not have the authority to require mitigation on private lands. To date, the Proponents have agreed to apply WEED-1 on all lands in Wyoming, and all lands in Idaho Segments 6, 8, and 9.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-160 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # WEED-3: appropriate management of soil stockpiles to prevent the spread of invasive species is recommended regardless of land ownership.	The BLM agrees with your recommendation, but does not have the authority to require mitigation on private lands. To date, the Proponents have agreed to apply WEED-1 on all lands in Wyoming, and all lands in Idaho Segments 6, 8, and 9.

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101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-162 -- 2 -- Table 2.7-1 -- Julie Reeves, WYES -- WILD-1 states "Requests for exceptions from closure periods and areas will be submitted by the Proponents to the appropriate BLM Field Office.... Factors considered in granting the exception include animal conditions, climate and weather conditions, habitat conditions and availability, spatial considerations (e.g., travel routes and landscape connectivity), breeding activity levels, incubation or nestling stage, and timing, intensity, and duration of the Proposed action." Please note that the BLM has authority over wildlife habitat, but the Service and the applicable state wildlife agency have authority over wildlife. Requests for exceptions for work that may impact a federally listed species or migratory bird should be brought to the Service and/or the state wildlife agency.	The BLM Field Offices will be responsible for contacting the USFWS or state wildlife agency as appropriate if a request for an exception may impact a federally listed species or migratory birds.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-162 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # WILD-2: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to migratory birds, sensitive and/or listed species will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except private lands along Segments 4, 5, 7, and 10 in Idaho.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-163 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # WILD-6: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to migratory birds will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except private lands along Segments 4, 5, 7, and 10 in Idaho.

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			proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-164 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # WILD-10: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to migratory birds will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except private lands along Segments 4, 5, 7, and 10 in Idaho.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-164 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # TESWL-1: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to migratory birds, particularly sage and sharp-tailed grouse will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands; however, the Proponents have committed to implementing this EPM on private land as well as federal lands in Wyoming. This EPM states: "H-frame structures will be equipped with anti-perch devices". Segments 1W and 3A (which are in Wyoming) use this type of tower. The Proponents have committed to implementing this EPM on all lands in Wyoming. All other segments use lattice structures. Placing anti-perching devices on lattice towers is not practical because every cross piece provides a perching location. The entire length of all four sides of the structure would need to be blocked with anti-perching devices.

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			transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-165 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # TESWL-4: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to sensitive and/or listed species will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except private lands along Segments 4, 5, 7, and 10 in Idaho.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-165 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # TESWL-7: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to the yellow-billed cuckoo will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except private lands along Segments 4, 5, 7, and 10 in Idaho.

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			interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-166 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # TESWL-8, TESWL-9, TESWL-10, and TESWL-11: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts sage grouse will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on all lands except private lands along Segments 4, 5, 7, and 10 in Idaho.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-167 -- 2 -- Table 2.7-1 -- Matthew Stuber - IFWO -- New EPM # TESWO-15: If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to prairie dogs will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	As noted in the comment, the BLM has no authority to require the Proponents to implement EPMs on non-federal lands. The Proponents have committed to implementing this EPM on federal land only.

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101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-200 -- 2 -- Table 2.8-6 -- Matthew Stuber - IFWO -- Table should include a comparison feature for sensitive plants (i.e. LEPA)	Table 2.8-6 provides an overview summary comparison of the Segment 8 alternatives. Potential impacts to sensitive plants are addressed and compared between alternatives in detail in Sections 3.6 and 3.7 of the FEIS.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.7-19 -- 3.7 -- 3.7.2 -- Julie Reeves, WYES -- Morley Nelson Snake River Birds of Prey Special Status Species Standard 6 calls for avoidance within 0.5 miles of occupied sensitive plant habitat, and so the EIS states that this plan may need to be revised to accommodate the Project through the SRBOP. However, the Preferred alternative avoids crossing through the SRBOP, and the Service supports the alternative that avoids and minimizes impacts to slickspot peppergrass while additionally avoiding impacts to this important bird area.	This comment is noted.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.7-20 -- 3.7 -- 3.7.2.2 -- Julie Reeves, WYES -- Regarding federally listed plant species, the EIS states that “Maintenance of vegetation in the ROW, including cutting of trees and taller shrubs, is not expected to affect any of the ESA-listed or candidate plant species because all of these species occur in habitats dominated by low-growing vegetation or in habitats where other protection measures would apply that would minimize impacts.” The Service appreciates that EPMs would avoid and minimize impacts to federally listed plant species within the vicinity of the Project. However, some listed plants occur near taller vegetation such as willows, Russian olives, and cottonwoods, and so removing or trimming taller vegetation may indirectly impact listed plants through crushing or by altering the microclimate of the habitat where the plants occur. Additionally, herbicide application within the ROW may indirectly affect listed plants.	Noted, the Service can provide additional requirements in the BO.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.7-23 -- 3.7 -- 3.7.2.2 -- Julie Reeves, WYES -- TESPL-7 states “Ute Ladies’-tresses – Qualified botanists shall conduct pre-construction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositeing of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to land management agency for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction.” The Service recommends that the project avoid all suitable habitat, not just identified populations of this species, especially given discussion on page 3.7-23 regarding the difficulty in finding these plants.	This is one of the Proponents’ EPMs; the Service can provide additional requirements in the BO.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.10-17 -- 3.10 -- “Birds” heading -- Matthew Stuber - IFWO -- Should mention if IBAs are present in the analysis area. If so, what measures are being implemented related to these areas? Avoidance? Seasonal restrictions? Limited vegetation clearing?	IBAs are noted in Section 3.10 on page 3.10-17 as part of the description of the affected environment. Impacts to IBAs are included in Section 3.10.2.2; Table 3.10-5 lists IBAs crossed by the Project. The FEIS discloses that impacts to birds using IBAs would be similar to impacts elsewhere, although the severity of

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				impacts may be higher due to the high importance of these areas to certain species. All measures for the protection of birds that apply elsewhere for the Project also apply for IBAs; see Table 2.7-1 for a summary of protection measures.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.10-34 -- 3.10 -- WILD-6 -- Matthew Stuber - IFWO -- If this EPM is not implemented by the project proponent on all lands affected by this project, impacts to migratory birds will not be avoided or minimized to the extent possible. Based on the project proposal we anticipate relatively high levels of adverse impacts (both direct and indirect) in some locations within and near the project footprint. While we recognize that the BLM does not have authority to require avoidance and minimization measures or mitigation on non-federal lands, they are required under several federal regulations (NEPA, MBTA, ESA, BLM 6840) to analyze project proposals in their entirety regardless of land ownership and then work with the project proponent to ensure measures are implemented on all lands to avoid, minimize and mitigate project impacts. Construction of the Gateway West transmission line on federal lands enables construction of the transmission line on non-federal lands, and vice-versa; therefore, the impacts on federal and non-federal lands are interrelated and interdependent and should be analyzed and impacts addressed as one action regardless of ownership. If unresolved, the inconsistent application of this EPM by the project proponent on all lands impacted by the project must be disclosed and should be thoroughly discussed in the EIS.	The FEIS analyzes project actions and mitigation measures across the landscape, regardless of ownership. Measure WILD-6 is applicable to federal lands, as well as to all lands Wyoming, and all lands in project Segments 6, 8, and 9 (see Table 2.7-1). In addition, the FEIS goes on to state on p. 3.10-34 that "the Proponents would work with the USFWS to determine which guy wires would require flight diverters on private lands as well (per the USFWS authority under the MBTA, which applies to all land ownerships)." This broad coverage of WILD-6 should cover all locations of concern for impacts to migratory birds.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.11-18 -- 3.11 -- 3.11.1.4 -- Julie Reeves, WYES -- The EIS states "Preconstruction survey results would be provided to the applicable land-management agency." The Service requests that all survey information regarding federally listed species or migratory birds be provided to the Service as well as the applicable land-management agency.	The BLM agrees with this request, and has added the measure as a condition of our ROD.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.11-18 -- 3.11 -- 3.11.1.4 -- Julie Reeves, WYES -- TESWL-2 states "In the event that an ESA-listed species not covered by the Project's BO is discovered during surveys, construction will cease, the USFWS will be notified, and Section 7 consultation will be initiated. In addition, the transmission line or structures will be relocated to minimize direct impacts to newly discovered ESA species, to the extent practical." The Service appreciates that construction will cease and that we will be contacted should a federally listed species be identified during pre-construction surveys. The phrase "to the extent practical" with regards to minimizing impacts to a listed species is not well defined and does not allow the BLM or the Service to make an informed decision about the severity of impacts.	The comment is correct in saying that "practical" is not well defined. Note that this is one of the Proponents' EPMs; the Service can provide additional requirements in the BO.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.11-62 -- 3.11 -- Matthew Stuber - IFWO -- Please explain any sage-grouse related restrictions proposed in PPH or PGH habitats in Idaho. Same as listed here? Different?	Please refer to Table 2.7-1 for the full list of protection measures and applicable land ownership.

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101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	3.11-73 -- 3.11 -- 3.11.2.2 -- Julie Reeves, WYES -- The Service does not support the use of guy wires in areas with high avian use due to the increased collision risk of these wires. However, we appreciate that EPM Wild-6 calls for the installation of flight diverters on all guy wires on Federal lands and on some state and private lands.	This comment is noted.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	4-66 -- 4.0 -- 4.4.11.3 -- Julie Reeves, WYES -- You state that buffers for nesting migratory birds would be “ranging from 10 meters for shrub-nesting species to up to a mile for sensitive raptor species.” The Service supports placing appropriate buffers around nesting birds, and request clarification about the range of distances mentioned here.	It is not clear from the comment what kind of clarification is requested. The protection measure in the FEIS requires buffers appropriate to the species being avoided. The range noted in Chapter 4 represents the smallest buffer (10 meters) to the largest buffer (1 mile) appropriate for species within the project area. Species habitat requirements are discussed in Sections 3.10 and 3.11 of the FEIS.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	4-66 -- 4.0 -- 4.4.11.3 -- Julie Reeves, WYES -- The EIS states “Though no known monitoring at either wind farms or at transmission line locations is being conducted...” The Service is aware of on-going monitoring efforts at Wyoming wind facilities.	The BLM would appreciate any details the Service can share regarding ongoing monitoring efforts at Wyoming wind facilities. This was not known at the time of FEIS preparation.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	4-67 -- 4.0 -- 4.4.11.3 -- Julie Reeves, WYES -- The Service appreciates that the EIS acknowledges that “Gateway West would not have a measurable adverse effect on non-special status migratory bird populations or significant bird conservation sites but would impact individuals and have an adverse effect on migratory bird habitats and ecological conditions through vegetation removal, fragmentation of native habitats, and possible increases in predation pressure due to adding perching substrate for avian predators and adding service roads sometimes used by canid predators.” The Service appreciates that Rocky Mountain Power has submitted a draft migratory bird conservation plan that will address how Gateway West will be sited to avoid and minimize impacts to migratory birds and their habitats, and that compensatory mitigation for habitat lost is being proposed. We recommend that the migratory bird conservation plan be referenced as an appendix to the EIS or will be included in the ROD.	Per your recommendation, the Proponents' Migratory Bird Conservation Plan has been included with the ROD.
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	4-76 -- 4 -- Table 4.4-2 -- Matthew Stuber - IFWO -- Header of 4th column was changed according to our previous suggestion to include PPH/PGH in the analysis. However, this column heading was not changed in the pages that follow.	Thank you for pointing out this error
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	2-8 to 2-9 -- POD -- 2.7 -- Julie Reeves -- WYES -- In the Rocky Mountain Power's and Idaho Power's section on Existing Transmission System Reliability Constraints, the Plan of Development states that the companies would not build an alternative that includes siting the line within 250 feet of existing transmission in one or more corridors because it would not meet minimum standards for reliability. The Service understands that, after the initial siting study for Gateway West, WECC revised its reliability criterion concerning corridors within 250 feet of an existing line. Where sensitive wildlife and plant populations or habitats could be negatively impacted by the siting of Gateway West	The issue of separation distances between transmission lines is discussed in detail in Chapter 1 of the FEIS. The BLM has concluded that the minimum separation distances proposed by the Proponents are reasonable and consistent with regional conditions. During final design, the Proponents will evaluate where this distance can be decreased to avoid impacts to sensitive resources on a site-specific basis.

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			1,500 feet from an existing line, the Service recommends that the distance between the existing and proposed line be decreased to avoid or minimize those impacts in that area.	
101108	BARBARA CHANEY, ET AL. (see preceding)	US FISH AND WILDLIFE SERVICE, ET AL. (see preceding)	App. M -- All -- Appendix M -- All -- Barbara Chaney -- IFWO and Julie Reeves - WYES -- The Service appreciates the inclusion of the BA as Appendix M to the FEIS. However, we acknowledge that the BA included in Appendix M is not the BA that the Service accepted as appropriate and does not contain the errata and subsequent additions to the BA. The Service is responding to the complete BA with a BO on or before September 12, 2013.	This comment is noted.
101110	ROBYN C THOMPSON		We are hopeful this may encourage the decision makers to choose 9D in the FEIS.	Your preference for Alternative 9D is noted. The BLM is implementing a phased decision and will continue to work with local government and stakeholders to seek a consensus resolution to siting issues in Segment 9.
101111	ROBYN C THOMPSON		<p>Comment #1:</p> <p>Refer to pg 3 "Letter to the Reader" and Chapter 1 pgs 1-9 thru 1 10. We endorse a phased decision for segments 8 and 9 based on the following rationale:</p> <p>1) The DEIS released in 2011 did not designate BLM preferred alternatives which made commenting confusing and laborious.</p> <p>2) In the fall of 2009 Idaho Power designated Segment 8 as their preferred alternative.</p> <p>3) February 2012, after considerable grass roots efforts, the BDO BLM designated 9D as their preferred alternative. Finally 100% consensus from Owyhee County citizens and elected officials, county commissioners, Idaho State Representatives, Governor Otter, the 1st Congressional District, Idaho Power and the BDO BLM!!!</p> <p>4) August 2012 the BLM released their preferred alternatives: Segment 8B, severely impacting private property, strongly opposed by all Ada and Canyon County elected officials and all Kuna and Melba property owners.</p> <p>Segment 9E; miles of virgin territory without so much as a service line in it, impacts sage grouse habitat, impacts historical private property. This alternative is not acceptable to any Owyhee County residents. This alternative was altered without the consent of Owyhee County citizens.</p> <p>5) We produced blow out attendance at the BLM public meetings due to the opposition to seg 8B seg 9 and seg 9E:</p> <p>Boise 46 Kuna 104 Murphy 144 Melba 87</p> <p>6) The citizens of Ada, Canyon, and Owyhee Counties have worked tirelessly to properly site segments 8 and 9 since February 2009. We respectfully request a phased decision to have these lines sited properly. We have to live with the permanence of this decision. I am resubmitting</p>	The BLM is continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.

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			comments written after the closing of the DEIS to drive our points home. [See Letter 100692]	
101111	ROBYN C THOMPSON		Refer to 2.7.5 Proposed EPMs and Agency Mitigation Measures 1) We strongly encourage the BLM to consider the mitigation measures proposed by the Proponents to accommodate segment 8 and segment 9D.	The BLM concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared. We are continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.
101111	ROBYN C THOMPSON		2) Throughout the FEIS these words could be found "which would not meet the intent of the enabling legislation for the SRBOP" when referring to seg 8 and seg 9D. We vehemently disagree with this interpretation of public law 103-64 and submit the following comment. February 5, 2013 A case for Segment 9 of the Gate Way West Transmission Line Project to be sited in the SRBOP NCA. In March 2009 citizens in Oreana became aware of Idaho Powers proposed transmission line project severing private property thur the communities of Bruneau, Little Valley, Grand View, Oreana and Murphy. With considerable time, energy and expense the citizenry of Owyhee County was awakened to this development. Frank Bachman organized a large meeting in Bruneau late April 2009 and the Owyhee County Task Force was born and began working in tandem with the Owyhee County Commissioners (OCC), Boise Office District BLM (BOD BLM), Idaho Power engineers and Tetra Tech developing two alternative routes; 9D and 9E submitted September 1, 2009 into the DEIS. The OCC were definitive that alternative 9D following an existing 138 kV line parallelling a brand new road built with M. Obama stimulus money in the SRBOP NCA was the only route endorsed by the OCC and the Owyhee Co. Task Force. In tandem with developing alternative 9D members of the Owyhee Co. Task Force researched the birth of the Gate Way West Transmission Line Project and discovered that in 2005 President George Bush signed the Energy Act. Section 368 of the Energy Act calls for the establishment of energy right-of-way corridors on Federal land in consultation with local governments, following existing transmission lines (as defined in section 103(0) of the FLPMA of 1976 (43 U.S.C. 1702(0)) and shall incorporate the designated corridors into the relevant agency land use and resource management plans or equivalent plans. This is not what happened in Owyhee County. May 28, 2008 the Owyhee Avalance announced a public scoping meeting to authorize ROW for the Gate Way West on BLM land. The public was not notified regarding the impact of this public utility project on private land. As a result only 13 people attended the June 3, 2008 public scoping meeting held in Murphy, ID. Obviously comment from Owyhee Co. citizens was woefully inadequate to absent.	The BLM held many meetings with local stakeholders since the first meetings in 2008. It worked with the County and local stakeholders to reach consensus on a route. However, the NLCS staff reviewed the project routes in the AFEIS, they and concluded that the ground disturbance and new access roads would not meet the enhancement requirements of the enabling legislation based on the proposed mitigation available at the time the FEIS was prepared. As part of their Final EIS comments, the Proponents submitted an "Enhancement Portfolio" for routes located in the NCA. The Bureau has concluded that the Portfolio, while presently insufficient, has merit and the potential to meet the enhancement requirement in the enabling legislation. However, reaching that sufficiency is estimated to take 1 – 2 years. Therefore, the BLM is implementing a phased decision and will continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.

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			<p>While establishing the WWE corridor over private land and prime farmland, the agricultural and economic base of Owyhee Co., the BLM adapted a land use management plan for the SRBOP prohibiting new transmission lines in the BOP - contrary to Sec. 368 of the 2005 Energy Act.</p> <p>June 2011 the BLM released the DEIS. The BLM did not designate a preferred alternative for seg 9 making comment most difficult. Citizens and OCC alike submitted comments to the 3,150 page document prior to the 90 day dead line. The OCC and Owyhee Co. Task Force continued to work with the BOD BLM and Idaho Power adjusting alternative 9D addressing BLM's concern with this proposal. February 2012 the OCC, Owyhee Co. Task Force, Idaho Power, BOD BLM, State Representatives, Gov Otter and Idaho's 1st Congressional District were all 100% in consensus supporting alternative 9D as amended. Mr Walt George, Mr Steve Ellis and Mr John Sullivan were sent to Washington D.C. to bring alternative 9D across the finish line. Instead these men returned with the message that Carl Rountree, Assistant Director National Landscape Conservation System and Community Partnerships (BLM) was denying 9D access into the BOP. September 2012 the BLM announced its preferred alternative for seg 9: segment 9E. The caveat, however, the alternative has been significantly altered: at Castle Creek, Oreana, the route takes a sharp turn, traverses over the historic Jess property, over the newly purchased Breuer property with a brand new house and shop (purchased for the sole purpose of escaping proposed seg 9 and 9E), the historic Joyce Ranch proprietor Paul Nettleton, Chad Nettleton's new home... then swings west catching the Gene Lewis subdivision affecting Karen Steenhof's property. It is noteworthy that Karen Steenhof, Paul Nettleton, Chad Nettleton, Ernest Breuer and Robyn Thompson were all instrumental in the development of alternative 9D. It is also noteworthy that alternative 9E is in sage grouse habitat. Immediately south of the Breuer's newly acquired property are seasonal road closure signs for sage grouse. It defies all logic to run a 500 kV line for birds of prey to perch or pick of the sage grouse! In tandem with announcing this surprise selection for a preferred alternative the BLM's rationalization = "The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated there with, and of the scientific, cultural, and educational resources of the public lands in the conservation area" Section 3 Establishment of NCA (a)(2) Public Law 103-64 Aug 4, 1993. Let's review other significant contents of NCA Enabling Legislation. Public Law 103-64 Aug 4, 1993 Snake River Birds of Prey National Conservation Area: Section 1. Findings</p>	

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			<p>The Congress finds the following:</p> <p>(10) An ongoing research program funded by the BLM and National Guard is intended to provide information to be used in connection with future decision making concerning management of all uses, including continued military use of public lands within SRBOP.</p> <p>(12)Hydroelectric facilities for the generation and transmission of electricity exist within the SRBOP.</p> <p>Section 2. Definitions</p> <p>(10) The term "hydroelectric facilities" means all facilities related to the generation, transmission and distribution of hydroelectric power and which are subject to, and authorized by, a license(s), and any and all amendments there to, issued by the Federal Energy Regulatory Commission.</p> <p>Section 3. Establishment of NCA</p> <p>(3) Subject to the provisions of subsection (d) of this section and section 4. uses of the public lands in the conservation area existing on Aug 4, 1993, shall be allowed to continue.</p> <p>Section 4. Management and Use</p> <p>(g) Cooperative Agreements - The Secretary is authorized to provide technical assistance to, and to enter into such cooperative agreements and contracts with the State of Idaho and with local governments and private entities as the Secretary deems necessary or desirable to carry out the purposes and policies of this Act.</p> <p>(i) Hydroelectric Facilities -</p> <p>Notwithstanding any provision of this Act, or regulations and management plans undertaken pursuant to its provisions, The Federal Energy Regulatory Commission shall retain its current jurisdiction concerning all aspects of the continued and future operation of hydroelectric facilities, licensed or relicensed under the Federal Power Act (16 U.S.C. 791 a et seq.) located within the boundaries of the conservation area.</p> <p>Section 6. Other Laws and Administrative Provisions</p> <p>(b) Release - The Congress finds and directs that the public lands with in the SRBOP NCA established as a natural area in October 1971 by Public Land Order 5133 have been adequately studied and found unsuitable for wilderness designation pursuant to section 603 of the FLPMA of 1976. Such lands are hereby released from future management pursuant to section 603(c) of such an Act and shall be managed in accordance with other applicable provisions of law, including this Act. It is apparent to the residents of Owyhee County Public Law 103-64 was never intended to prohibit future transmission lines in the SRBOP NCA. It is our contention that the 2008 SRBOP NCA RMP and ROD are outside the intent of Public Law 103-64 Aug 4, 1993 and FLPMA 1976; and we advocate for an amendment to the RMP to accommodate segment 9D. We would like to address the issue</p>	

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			of enhancing the SRBOP NCA. It has come to our attention Idaho Power is prepared to bear the expense of meeting this requirement, thus issue resolved. We have one more disturbing matter requiring attention. Our OCC were not afforded the courtesy of the Administrative copy of the FEIS. Idaho's Governor Butch Otter was kind enough to extend the services of Idaho's Dept. of Energy Administrator John Chatburn. Mr Chatburn graciously submitted Owyhee County's comments via the Governor's office. One must bear in mind our comments were made without the advantage of reviewing the Administrative FEIS. FLPMA sec 202(f) and sec 309(e) provide that the Federal, State and local governments and the public be given adequate notice and an opportunity to comment on the formulation of standards and criteria for, and to participate in, the preparation and execution of plans and programs for the management of public lands. We expect the BLM to operate in transparency including our OCC in all correspondence and decisions. Respectfully Submitted by: Ernest P Breuer Robyn C Thompson [See pdf Appendix 1. NCA Enabling Legislation]	
101111	ROBYN C THOMPSON		Our OCC were not afforded the courtesy of the Administrative copy of the FEIS. Idaho's Governor Butch Otter was kind enough to extend the services of Idaho's Dept. of Energy Administrator John Chatburn. Mr Chatburn graciously submitted Owyhee County's comments via the Governor's office. One must bear in mind our comments were made without the advantage of reviewing the Administrative FEIS. FLPMA sec 202(f) and sec 309(e) provide that the Federal, State and local governments and the public be given adequate notice and an opportunity to comment on the formulation of standards and criteria for, and to participate in, the preparation and execution of plans and programs for the management of public lands. We expect the BLM to operate in transparency including our OCC in all correspondence and decisions. Respectfully Submitted by: Ernest P Breuer Robyn C Thompson [See pdf Appendix 1.	Owyhee County chose not to become a cooperating agency for the project. Only cooperating agencies receive a copy of the AFEIS for review.
101111	ROBYN C THOMPSON		Comment #3 Refer to 3.2-161 thur 3.2-164 and 3.2-173 thur 3.2-189 Pictures are worth 1000 words. Please enjoy the enclosed... [See pdf for images] The following photos are altered 9E, Oreana, Idaho. [See pdf for images] Good Morning John; I am a concerned Oreana, Idaho resident who has been to a few of the Gateway West power line meetings. I didn't head out on my mare last Saturday to take these kind of pictures I was just going to one of our favorite spots on a nice day. As we were going along I remembered that I was traveling inside one of the proposed two mile wide energy corridors that should be decided on soon. So I decided to take some pictures mostly for myself I case it had to change. As I continued on this mission I decided that I really wanted to share these... on the chance that it may help the right people come to the correct decisions. My neighbors who have been more active than I advised me to send these to you. Leah Osborne	Thank you for submitting your pictures. The BLM is continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.

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			gave me your email address. Thank you in advance for your time. I didn't want to send a group picture as I wanted to be clear on where each picture/direction was, but I will try to send only the pertinent ones and be brief. This first photo is a couple of miles going west up Hart Creek on a dirt rd that is off of Bachman Grade Rd just past the Jess Place. We are looking west and the 2 Hart Creek canyons are just below on a piece of private property that we call the Aman place. It belongs to my neighbor and is a favorite place for me to go as there is always enough water running from Big Hart Creek canyon to water my dog and mare. Thank you again. Sincerely, Marcy Peterson Oreana, Idaho	
101111	ROBYN C THOMPSON		[Handwritten note:] The following photos and comments are regarding the BLM's preferred alternative 9E, altered from the 9-1-09 submitted alternative. Clarification by Robyn Thompson with permission Marcy Peterson: 10:00 am May 9, 2013. [See pdf for image] Standing in the same spot only turned to the north looking at a long line of steep chalky bluffs that the 2 mile wide energy corridor would have to cross to proceed north to cross Pickett Creek next. Hart Creek runs just below these cliffs. [See pdf for image] Standing in the same spot, but turned a bit more to the northeast to take in more of the chalky cliffs. There is a piece of private ground below these cliffs which is called the Cave Place. It is between the Jess Place (east side of the corridor on Hart Creek) and the Aman Place (west side of the corridor on Hart Creek.) It is called the Cave Place because there is an actual, wonderful ancient Indian Cave down there that has been explored and excavated by experts and they do have ancient artifacts from that cave in a museum somewhere in Boise or Nampa. I am not the expert on the cave but it is there in the middle of this proposed energy corridor route. Hart Creek runs right past the large cave and makes a pool going into the ground a few feet east of the cave	Thank you for submitting your pictures. The BLM is continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.
101111	ROBYN C THOMPSON		... I can usually water my dog & mare there in the summer months too. It must also be very nice for the wildlife and birds. [See pdf for image] What a view on a clear day to stand below the Owyhee Mountains looking east to the Trinities. [See pdf for image] We are going west up Hart Creek into the Aman place to look at the canyons. [See pdf for image] Little Hart Creek canyon does not run water all of the time, but check out the brush/cover for the birds. Chuckar and grouse like to hang out around these canyon walls and in this brush. [See pdf for image] At the SW corner of the Aman Place is big Hart Creek canyon. The creek runs through it all summer at least anytime that I have observed it. [See pdf for image] Turning for home. Looking east toward Oreana again So, what will this look like if it becomes part of the 2 mile wide energy corridor soon?	Thank you for submitting your pictures. The BLM is continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.
101111	ROBYN C THOMPSON		How will it affect the sage grouse and other wildlife?	Please refer to Sections 3.10 and 3.11 in the FEIS for an analysis of effects to wildlife, including greater sage-grouse.

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101111	ROBYN C THOMPSON		<p>See pdf for image] I am nearly home. This is the gate to the Jess Place Hart Creek/Bach man Grade Road a couple of miles or so west of the last power pole on Bachman Grade Road. This private property was land patented to the Jess' in 1902, you may be able to see it on the sign over the gate posts. This is the east side of the corridor they tell me.</p> <p>[See pdf for image] Just another angle of the Jess place to show those steep chalk cliffs that you have to go around ... to get to the next one.</p> <p>[See pdf for image] Now it is Monday morning and the wind isn't blowing so I decide to take the mare and the border collie and ride up the valley South of Hart Creek and take some pictures of the Brown's Creek area and canyons. Here we are looking west again over approx. 2 miles across the the foothills of the Owyhees. [See pdf for image] There is a lot of sand out there to get bogged down in and not many roads.</p> <p>[See pdf for image] We are headed toward the " Little Browns Creek Canyon" that only has run off water in it when it rains enough. We will not make it to the main Brown's Creek canyon today. But, we are still looking across part of the proposed route for the Gateway West 2 mile wide energy corridor. [See pdf for image] We may as well take in a view of the steep chalky cliffs that run the length of the south side of Browns Creek from Browns Creek canyon ... not as much light today so they do not look nearly as impressive as they really are. I want to give everyone a clue. You have to ride around them. [See pdf for image] Little Browns Creek canyon. It is almost always dry, but the game birds still do like it here. I can hear them warning all of us coming near and then of course they are gone by the time we approach. [See pdf for image] Looking back east again from the little Browns Creek canyon ... viewing the same set of mountains in the east that we saw from Harts Creek. [See pdf for image] We are turning a bit NE and heading for home.</p>	Thank you for submitting your pictures. The BLM is implementing a phased decision and will continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.
101111	ROBYN C THOMPSON		<p>We are turning a bit NE and heading for home. Again wondering would be like if the energy corridor happens to come through here and wondering why anyone would choose this route... it is so much farther and so much harder to access for maintenance. There are very steep and hard to access places and fragile places with lots of wildlife habitat. Plus has anyone thought about how it would be to manage a lightning strike out here in a bad windstorm? These are common here... both things. And there is a long response time to even get here in the first place</p>	Thank you for submitting your pictures. The BLM is continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.
101111	ROBYN C THOMPSON		<p>North of the river where the energy corridor is already established is not only closer and more economical, there are roads established for access and maintenance. Plus it is as flat as a pancake for the most part</p>	The BLM concluded that the ground disturbance and new access roads associated with Alternative 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.

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101111	ROBYN C THOMPSON		it does not endanger the existing wildlife. I understand that there are no sage grouse in the already established energy corridor north of the snake river. Thank you for allowing me to share John. I assure you that this is the last picture that I have for you at least today. Sincerely, Marcy Peterson Oreana, Idaho	Thank you for submitting your pictures. The BLM is continuing to work with local government and stakeholders to seek a consensus resolution to siting issues in Segments 8 and 9.
101111	ROBYN C THOMPSON		[Note: handwritten message:] North of the river = alternative 9D: the only alternative endorsed by the Owyhee County Commissioners. Clarification by Robyn Thompson Owyhee County Task Force with permission Mary Peterson: 10:00 am May 9, 2013. [See pdf for image]	The BLM concluded that the ground disturbance and new access roads associated with 9D would not meet the enhancement requirements of the enabling legislation for the SRBOP based on the proposed mitigation available at the time the FEIS was prepared. Please note that Alternative 9D affects the same amount of private land as Alternative 9E (3.3 miles) and is not adjacent to an existing transmission line for several miles within the NCA. The BLM is continuing to work with local stakeholders to seek a consensus resolution to siting issues in Segment 9.
101111	ROBYN C THOMPSON		We oppose segment 8B	Your opposition is noted.
101111	ROBYN C THOMPSON		We endorse segment 8	Your support is noted.
101111	ROBYN C THOMPSON		*We oppose segment 9 *We oppose segment 9E	Your opposition is noted.
101111	ROBYN C THOMPSON		We endorse segment 9D	Your support is noted.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Executive Summary -- Soils, Geologic Hazards, and Minerals -- ES-23 - - 1 -- Project Construction activities that would affect soils include clearing, grubbing, and grading along the ROW and at additional temporary workspaces; trenching; backfilling; excavating; and construction of permanent structures, such as transmission line structures, access and service roads, co-generation sites, and substations. -- Correct "co-generation sites" to "regeneration sites"	Noted.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Substations That Would Be connected by Gateway West - Shirley Basin -- 1.3-2 -- 1-26 -- Table -- (Shirley Basin Substation) This new substation will be constructed immediately adjacent to the Difficulty Substation. Difficulty must be kept in service while Segment 1W(c) is reconstructed, requiring the additional bus construction to be conducted adjacent to the existing substation. Construction of Heward will allow PacifiCorp to control the operation of the new buses, essential for reliability of the reconstruction. -- Purpose of substation as presented is incorrect. Appears to have been cut and pasted from Heward. Correct to read: "Shirley Basin is an existing substation which is included in the Dave Johnston-Heward-Shirley Basin-Aeolus 230 kV line rebuilt (1Wc). The new line will be looped into the Shirley Basin substation. No ground disturbing activities will be required."	Noted.

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101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Geographic Scope -- 1.7.1 -- 1-37 -- 3 Right of Way -- The width depends on the voltage; a 250-foot ROW for the 500-kV single-circuit sections of the Project and a 125-foot ROW for the 230-kV single-circuit sections of the Project. -- Please add Segment 3A details, the 5 mile section of 345-kV with 150-foot ROW (between Anticline and Jim Bridger)	Noted.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Transmission Line Features Common to All Proposed 230-kV Segments --2.1-2 -- 2-4 -- Table -- One OPGW containing 48 fibers and with diameter of 0.637 inch... -- Should be "One OPGW containing 48 fibers and with diameter of 0.465 inch..."	Noted.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Segment 1W - BLM Preferred Alternative -- 2.4.1.1 -- 2-42 -- 2 -- ...This portion of the Preferred Alternative minimizes impacts by using an existing ROW... -- Existing ROW will be expanded to 125-feet if currently less than 125-feet.	Noted.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-151 -- VIS-15 (agency required) -- If Alternative 7K is selected, Natina stain (or an equivalent product) will be applied to towers (including lattice towers) placed on NFS lands within the Sawtooth NF to reduce visual effects at the middleground level. -- Our engineering analysis has determined: 1) From an engineering perspective, there is little information available addressing effects of the Natina treatment on structural integrity, especially for transmission structures; 2) Two major concerns in assessing this product are degradation of the galvanizing layer and possible corrosion of bolted connections; 3) Natina estimates it would take 40-72 man-hours per tower depending on structure geometry and crew work rates. Approximately 175-225 gallons of solution would be needed to fully treat an individual tower and preliminary inquiries estimate it would cost \$15,000-\$20,000. It is not guaranteed that the desired color would be developed from one application though. If multiple applications are necessary, additional time and costs would be incurred; 4) In comparison to Natina Steel, dulled galvanizing is a much more controlled and proven procedure that also reduces visual effects. Various shades of grey can be selected to best blend into the surrounding environment, and can be just as effective in reducing visual impact as Natina Steel in many cases.	The Sawtooth NF believes that this technique has been applied elsewhere in multiple locations and is the most appropriate treatment for the portion of the Forest crossed by 7K. The manufacturer can provide the relevant contact information. Note that Alternative 7K is not part of the Preferred Alternative.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-158 -- VEG-10 (agency required) -- All timber and other vegetative resources to be sold or removed from federal lands will be appraised and sold at the appraised value. -- The Proponents will meet the terms and stipulations within the timber sale contracts for timber removal operations on federal lands (Kemmerer and Pocatello Fos will also require appraisal and sale).	This EPM covers more than timber resources; any saleable resource is covered by this requirement. Therefore, the original EPM text will remain.

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101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-159 -- TESPL-3 -- Qualified botanists shall conduct preconstruction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositeing of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to land management agency for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction -- The Proponents previously submitted a comment on this measure while commenting on the Draft EIS. The BLM has adopted some, but not all, of the Proponent's requested change. The BLM has left out the portion of the measure that would require BLM to respond within 20 days of receipt of the report. Based on past experience, the BLM's workload, and the BLM's budget constraints, the Proponent's are not confident that the BLM could review and respond to any submittals in a timely manner. This measure has the potential to add substantial and unacceptable delays to starting construction of the project. The Proponent's request that the BLM commit to a timeframe and process for reviewing all required submittals.	The BLM will endeavor to respond to all requests within a reasonable time. But because of budget constraints and work priorities, we may not be able to meet the applicant's requested 20-day timeframe.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-159 -- TESPL-4 -- Slickspot Peppergrass -- Environmental monitors will survey for and mark slickspots and aboveground populations of slickspot peppergrass within 50 feet of the construction area prior to ground disturbance (including roads) in potential or occupied slickspot peppergrass habitat. No construction shall occur within 50 feet of any slickspot peppergrass plants or slickspots found by the environmental monitor. Also, construction shall not occur within 50 feet of previously known occupied slickspot peppergrass areas, based on Idaho CDC data, even if aboveground plants are not observed by the environmental monitor. Within proposed critical habitat, impacts to Primary Constituent Elements, such as native sagebrush/ forb vegetation, will be avoided to the extent practicable. Seeding during reclamation in areas of suitable habitat will use methods that minimize soil disturbance such as no-till drills or rangeland drills with depth bands. Reclamation will use certified weed-free native seed. Excess soils will not be stored or spread on slickspots -- This measure will only apply for new roads and/or road improvements.	This measure applies to all ground disturbance, including roads, tower pads, and work areas. Application of surface occupancy and disturbance measures for Slickspot Peppergrass will primarily be governed by directions from the U.S. Fish and Wildlife Service in the Biological Opinion."
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-164 -- TESWL-1 -- H-frame structures will be equipped with anti-perch devices to reduce raven and raptor use, and limit predation opportunities on special status prey species on federally managed lands. -- Considering prudent use of rate	The FEIS acknowledges that some studies have found mixed results regarding the effectiveness of perch deterrents and anti-perch devices; however, it finds that the effectiveness of these deterrents has been supported by current research. The BLM views these devices as one tool amongst the total

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			payers money, this is an onerous and unwarranted measure. H-frame in comparison to lattice structures inherently reduce and minimize raptor perching and nesting opportunities. Rocky Mountain Power currently has agreements with the FWS (Office of Law Enforcement) to not use anti-perch devices as they have been shown to be ineffective and increase potential for nesting. This requirement conflicts with the working agreements with the FWS. Also, anti-perching devices when used at high voltages specifically pose maintenance and safety risks as they would require to be maintained "hot". Regarding sage-grouse predation, there are no scientific correlations to tall structures which justify the use of anti-perching devices (see the UWIN literature review regarding tall structures and sage-grouse).	minimization/avoidance measures necessary to limit potential impacts. Use of these devices is also required as part of some of the BLM district RMPs.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-163 -- WILD-8 -- Pre-construction pedestrian or aerial surveys will be completed during appropriate nesting time periods, needed to identify each raptor species. The Proponents will provide survey results to the authorized officer for approval. (See WILD-1) -- This measure is similar to WILD-4 and could be combined with that measure, however, the Proponents propose the following revision: "Pre-construction pedestrian or aerial surveys will be completed during the appropriate nesting time periods needed to identify active raptor nests. The Proponent will provide survey results to the authorized officer."	We see no advantage in combining these measures at this point in the analysis.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-164 -- WILD-12 (agency required) -- The Proponents will annually document the presence and location of large stick nests on any towers constructed as a result of this Project. Nests will be categorized to species or species group (raptors or ravens), to the extent possible. This would begin following the first year of construction through year 10 of operations. Results would be provided annually to the applicable land-management agency and to the USFWS. -- This level and duration of monitoring is onerous and the cost is not commensurate with any benefit.	We do not agree that monitoring for 10 years as part of the 50+ year project is unreasonable or onerous. The BLM and USFWS, under their MOU to implement the Migratory Bird Treaty Act, need to assess the transmission line effects on migratory birds who may use the towers as nesting sites, as nesting is an essential life history event. The inventory requires (1) the nest location (GIS coordinate), (2) whether the nest is associated with a raptor or corvid species (not individual species), and (3) an annual report, which could be compiled at the end of the summer season from all company activities associated with transmission line operation.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-165 -- TESWL-4 -- The Environmental CIC, an agency biologist, or agency designee will accompany the Construction Contractor site engineers during the final engineering design or prior to ground-disturbing activities to verify and flag the location of any known occupied structures (e.g., nests, burrows, colonies) utilized by sensitive species. This will include, but not be limited to, artificial burrows that have been constructed as part of research/restoration efforts, prairie dog colonies, and raptor nests, which could be impacted by the Project based on the indicative engineering design. The final engineering design will be "microsited" (routed) to avoid direct impact to these occupied structures to the extent practical within engineering standards and constraints. -- Not clear what "structures" the EPM is referencing.	"Structures" refers to artificial nesting structures or tree/rock outcrops that a nest may be built upon, in addition to "nests, burrows, colonies" as stated in the EPM text.

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101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-167 -- TESWL-14 (agency required) -- For the protection of aquatic and riparian/wetland dependent species, surface disturbing and disruptive activities will be avoided in the following areas: 1) identified 100-year floodplains; 2) areas within 500 feet of perennial waters, springs, wells, and wetlands; and 3) areas within 100 feet of the inner gorge of ephemeral channels on federally managed lands. Where it is not possible to avoid wetland and riparian habitat, crossing-specific plans will be developed. These plans will: 1) demonstrate that vegetation removal is minimized; 2) show how sediment would be controlled during construction and operation within wetland and riparian areas; 3) attempt to intersect the wetland or riparian habitat at its edge; and 4) provide measures to restore habitat and ensure conservation of riparian microclimates. This plan will be submitted to the appropriate land management agency and approved prior to construction of any portion of the Project within sensitive riparian habitat. -- In order to fully assess this measure, citations for the 500 foot and 100 foot "buffers" need to be provided and justified. In order to maximize tower distance from such areas, the conductor sag will be greatest and thereby require more intensive vegetation clearing than otherwise in order to maintain clearances. The Companies have avoided to the extent practicable impacts to aquatic and riparian/wetland dependent species. Please see the response regarding indicative and engineering design for more details. The information required to comply with 1-4 will be provided in the POD; application(s) to the U.S. Army Corps of Engineers, and/or construction storm water plans. It is not clear how a Proponent can preserve microclimate.	The measure was adapted from INFISH (Inland Native Fish Strategy; Forest Service 1995). The 500- and 100-foot buffers for wetlands and ephemeral channels are standard setback distances contained in all Wyoming BLM Mitigation Guidelines for Surface Disturbing and Disruptive Activities. These requirements are applied to all public lands in Idaho and Wyoming.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-167 -- TESWL-15 (agency required) -- Anti-perch devices will be required on power poles located within one-quarter mile of prairie dog towns within the BLM's Rawlins Field Office. -- Considering prudent use of rate payers money, this is an onerous and unwarranted measure. H-frame in comparison to lattice structures inherently reduce and minimize raptor perching and nesting opportunities. Rocky Mountain Power currently has agreements with the FWS (Office of Law Enforcement) to not use anti-perch devices as they have been shown to be ineffective and increase potential for nesting. This requirement conflicts with the working agreements with the FWS. Also, anti-perching devices when used at high voltages specifically pose maintenance and safety risks as they would require to be maintained "hot".	This is a Rawlins RMP requirement.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Environmental Protection Measures -- 2.7-1 -- 2-167 -- TESWL-16 (agency required) -- Sage-Grouse -- If the Kemmerer RMP is amended to allow Proposed Route 4 or Alternatives 4C or 4E to be selected, existing fences within 1 mile of the portion of the Gateway West Project located on lands managed by the Kemmerer RMP will be	While the BLM will continue to work with the Proponents on appropriate mitigation implementation, the measures included with the ROD are a condition of the ROW permit on federal lands.

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			modified with FireFly Grouse Flight diverters (or a similar product) in order to prevent greater sage-grouse mortalities. Additional site-specific reclamation, such as transplanting sagebrush seedlings within previous disturbed habitats, will also be required to off-set the net loss of sagebrush habitats within the Rock Creek/Tunp management area. -- Appropriate mitigations for impacts to sage-grouse will be implemented as identified through negotiations with the agencies.	
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	<p>Segment 7 - Populus to Cedar Hill -- 3.2.2.3 -- 3.2-146 -- Last -- ...VIS-15, detailed below, is required by the agencies to lower the visual effects of the alternative alignment on NFS lands managed within the Sawtooth NF.</p> <p>VIS-15 If Alternative 7K is selected, Natina stain (or an equivalent product) will be applied to towers (including lattice towers) placed on NFS lands within the Sawtooth NF to reduce visual effects at the middleground level -- Our engineering analysis has determined: 1) From an engineering perspective, there is little information available addressing effects of the Natina treatment on structural integrity, especially for transmission structures; 2) Two major concerns in assessing this product are degradation of the galvanizing layer and possible corrosion of bolted connections; 3) Natina estimates it would take 40-72 man-hours per tower depending on structure geometry and crew work rates. Approximately 175-225 gallons of solution would be needed to fully treat an individual tower and preliminary inquiries estimate it would cost \$15,000-\$20,000. It is not guaranteed that the desired color would be developed from one application though. If multiple applications are necessary, additional time and costs would be incurred; 4) In comparison to Natina Steel, dulled galvanizing is a much more controlled and proven procedure that also reduces visual effects. Various shades of grey can be selected to best blend into the surrounding environment, and can be just as effective in reducing visual impact as Natina Steel in many cases.</p>	The Sawtooth NF believes that this technique has been applied elsewhere in multiple locations and is the most appropriate treatment for the portion of the Forest crossed by Alternative 7K. The manufacturer can provide the relevant contact information. Note that Alternative 7K is not part of the Preferred Alternative.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	KOP C108 -- N/A -- 3.3-188 -- N/A -- N/A -- A number of wind towers have been constructed in the area (on private property) since the KOP photos were taken. If the KOP was done today, it would likely result in a finding of no effect or no adverse effect instead. Will there be opportunities to reassess impacts from the project at this, and other locations where significant visual impacts have occurred since the original assessment?	The FEIS was written with the most current information available at the time of preparation. Please refer to Section 3.2 of the FEIS for a description of how the BLM visual resource management procedures were followed.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	KOP C99 -- N/A -- 3.3-217 -- N/A -- Due to the distance of the KOP to the Preferred/Proposed Route, the similarity of the Project's design with existing structures, and the potential for the elements to blend in with the backdrop, the VCR for this KOP is assessed as low to moderate. The Project elements do not draw the attention of the casual observer; therefore, there would be no adverse impact to the resource at this location. -- If the project elements do not draw the attention of the	Please refer to Section 3.2 of the FEIS for a description of how the BLM visual resource management procedures were followed.

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			casual observer, shouldn't the assessment be weak, instead of "low [sic] to moderate"?	
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Overall Visual Impact -- N/A -- 3.3-220 -- 1 -- (see Section 3.3.2.4 -- Methods for additional description of these values). -- The correct section is 3.3.2.5 (3.3.2.4 is Native American Consultation)	This correction has been made and included in the errata sheet.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Comparison of Alternatives by Segment -- 3.14.2.3 -- 3.14-23 -- 1 -- Segment 4 also contains the highest risk from landslides. This segment and all the alternatives contain large areas of medium to high landslide risk. In the mid-1980s, a landslide failure near Viva Naughton Reservoir in southwest Wyoming (near Route Alternative 4F) necessitated the re-alignment of the existing Bridger to Borah 345-kV transmission lines. -- Author is correct to use the plural "transmission lines". Only one of the lines is the Bridger - Borah 345kV line, the other is the Bridger - Kinport 345kV line. These two lines are operated and maintained by PacifiCorp. The third line in this corridor is IPC's Bridger - Goshen 345kV line which was rebuild on the original alignment.	This clarification of the different existing transmission lines has been made and included in the errata sheet.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Electric and Magnetic Fields -- 3.21.2.2 -- 3.21-17 -- 1 -- The electric fields at the edges of the ROWs and the highest electric field found within the ROW for each of the line segments in the Project are listed in Table 3.21-6. The largest electric field calculated at the edge of the ROW was 1.23 kV/m. This level was found along the 230-kV line segments that had ROW widths of 125 feet. Fields of 0.77 kV/m were found at the ROW edge of the single-circuit 500-kV line segments (Segments 2 through 10). The highest electric field found within the ROW was 9.67 kV/m for the single-circuit 500-kV segments (Segments 5 through 10). -- Shouldn't this be Segment 2 - 10?	That is correct. The error has been fixed and included in the errata sheet.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Noise Sensitive Areas within Operations Analysis Area of Proposed Route and Route Alternatives -- 3.23-8 -- 3.23-17 -- Table -- N/A -- Reviewer had a hard time following table 3.23-8, for example for Segment 1W the table quantifies a number of NSAs near the 500kV centerline. There is no 500kV proposed for Segment 1W. Similarly this table shows a number of NSAs near 230 and 345 kV centerlines for Segments 8, 9 and 10. There are no such voltages proposed for these segments. Additionally, the introduction to the table refers the reader to Section 5.23.5.2 of the document for clarification but no such section exists.	Thank you for pointing out these errors.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Project-Wide Historic Trails Mitigation Program -- 5.2.3 -- 5-3 -- C-1 -- ". . . Pursuing a conservation easement with interested Wyoming landowners . . ." -- Clarify this pertains to Segment D (Windstar to Populus) ". . . Pursuing a conservation easement with interested Wyoming (Segment D) landowners . . ."	The POD is included with the ROD and includes any updates and corrections from the Proponents.
101109	PAM ANDERSON, KEITH	ROCKY MOUNTAIN	Cultural Resource Construction Monitoring -- 3.1 -- 3-1 -- 2 -- The CRS and/or CRM will observe the ground during mechanical scraping,	This suggestion is noted. The BLM has a responsibility to ensure monitoring of construction activities for potential impacts to

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	GEORGESON	POWER, IDAHO POWER COMPANY	grading, excavating, and similar activities for archaeological remains that might be exposed by these activities. -- Revise to state, "In areas where there is a high probability of encountering buried deposits, the CRS and/or CRM will observe the ground...."	cultural resources on its lands.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Appendix C-1/Attachment B--Draft Inadvertent Discovery Plan -- All - All -- All -- (historic properties, resources, cultural resources, sites, artifacts, cultural material, etc.) -- The plan needs to be revised to accurately differentiate between cultural resources and historic properties. Section 2.1 states, "For the purpose of this Plan, an inadvertent or unanticipated discovery is a discovery of historic properties where they had not been previously documented and that occurs during construction." The following list then includes a number of things that could be classified as a cultural resource, but aren't historic properties. Please revise.	The POD is included with the ROD and includes any updates and corrections from the Proponents.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	Proposed Amendment #3 -- 3.4.3 -- F.1-16 -- Mitigation -- Mitigation: Where the route would be visible on timbered slopes, limit tree removal to those portions of the right-of-way where it is required for safety in order to avoid creating a linear feature on the landscape. Vegetation removal requirements will consider Appendix A, Key Standards Relating to Electric System Reliability and Safety, of the Memorandum of Understanding with the Edison Electric Institute (2006). -- While this language still exists in Appendix F Appendix L states the requirement was dropped. Limiting tree removal on the ROW is obviously a requirement that would be incredibly onerous and dangerous for us to try to adhere to, please provide confirmation that this requirement has indeed been dropped and correct to show measure is dropped.	The comment is correct that the measure has been dropped. Appendix F-1, page F.1-16 has been updated to remove this language.
101109	PAM ANDERSON, KEITH GEORGESON	ROCKY MOUNTAIN POWER, IDAHO POWER COMPANY	DEIS Comment Letter Responses -- 100343 -- 92 -- N/A -- Chapter 2 - Components Common to All Actions Alts -- 2.7.5 -- 145 -- T2.7-1 (Vis-12) -- Where the route would be visible on timbered slopes, limit tree removal to areas required for safety rather than from the entire ROW in order to prevent a linear feature on the landscape from clear-cutting trees. Vegetation removal requirements will consider Appendix A, "Standards and Practices for Electric system reliability" -- The "area required for safety" is the entire ROW. A requirement that we not remove trees in the ROW will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, adversely affect system reliability, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. If land managers want to prevent linear features we can feather the right of way, as outlined in the last paragraph of Section 3.6.2.2, page 21 for the Medicine Bow-Routt and Caribou-Targhee NFs. -- This comment seems to have two different responses from the BLM. The first being "This measure is being reviewed by the BLM and will be revised based	This EPM is not included in the FEIS (see the full list of EPMs in Table 2.7-1).

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			on their direction (see Table 2.7-1 for the current list of measures)." The second being "This requirement is no longer being considered." The obvious question is which is it? Please verify consistent with Appendix F	
100804	JASON J AND TRACY THORNOCK		I am an affected landowner and homeowner and am submitting my comments regarding the Gateway West Transmission Line Project. I have been actively involved and participated in every public meeting and open house regarding this project from the beginning. All of the proposed and alternative routes that have been considered in segment 4 of this project would directly impact our property at some point, so we have closely monitored and actively participated in the process. The most recent "preferred alternative" is extremely concerning and unnecessarily places the line where it would have very negative impacts. Sadly, the determination to choose the current route was made based on misinformation and willful disregard for the impacts this route will have. To add insult to injury, this determination was made only very recently and shortly before the final EIS was released when it was "too late" to consider much better alternatives.	Many route alternatives were considered and analyzed in detail for Segment 4. The BLM Preferred Route in Segment 4 generally follows an established utility corridor on BLM-managed lands, and parallels three existing transmission lines for approximately 75 percent of its length. It was also the preferred route identified by the State of Wyoming and Lincoln County in their comments on the DEIS, and generally received broad public support during the DEIS comment period. The County is responsible for setting siting standards near residences and permitting the project on private lands. The BLM is continuing to work with local government and the Proponents to resolve routing issues near Cokeville.
100804	JASON J AND TRACY THORNOCK		We have spent the past two years focused on alternative 4F, which was the proponents preferred alternative until February of last year. Unlike the various other alternative routes under consideration (including the current preferred alternative), 4F was carefully plotted out and affected landowners were given site specific details of where the line would be built. Because we had a clear picture of where the proposed line would be if 4F were the chosen route, we were able to make informed decisions and recommendations as to why that route was a very poor choice and petitioned for consideration of better alternatives. This was a very lengthy and time consuming process. Affected landowners, community members, and county leaders made it clear that alternative 4F was not an acceptable route and we recommended that the new line be built along the existing line where a corridor had already been established and the impacts would be minimized. Since the current preferred alternative had never been discussed in any detail, we wrongly assumed that the new line would be on the south side of the existing line where there was plenty of open space, cooperative landowners and minimal impact. Gateway West representatives had met with Tim and Mathew Teichert and had done surveying south of the existing line and had led them to believe that the new line would be south of the existing line on Teicherts property and Tim and Mathew had expressed their willingness to negotiate an easement there. I had attended every scheduled meeting regarding segment 4 and had never heard or seen any suggestion that the new line would be on the north side of the existing line if the existing corridor were chosen. The county commissioners had recommended and assumed that the new line should be built south of the existing line. In private conversations with the proponents representatives, there was never any indication that they would put the new line so close to the town of Cokeville or on the north side of the existing line.	Alternative 4F could not be incorporated into the BLM's Preferred Alternative because it does not conform to the Wyoming Governor's sage-grouse executive order, nor did it offer a significant reduction in impacts to the cultural resources it was meant to avoid in comparison to other alternatives. The Lincoln Conservation District, Lincoln County, and the State commented on the DEIS that the BLM should select Alternative 4A, the route that follows the existing Bridger lines, and drop the original proposed route. The maps in the DEIS (e.g., Figure 3.2-2, A-5, and G-1.5.4-8) show that the 4A route was on the north side of the Bridger lines. The Proponents dropped the original route and adopted 4A as the new proposed route (see section 1.1.1 of the FEIS) due to public comments on the DEIS. The BLM agreed with the State and local recommendation and subsequently identified this route as the Preferred Route. Alternative 4A was analyzed in detail in the DEIS, and again as the Preferred Route in the FEIS. On both the DEIS and FEIS maps provided in Appendix A, the route is shown as adjacent to the existing transmission line, following along the north side from Commissary Ridge through the Cokeville area. The description of the route in Chapter 2 of the FEIS (Section 2.4.5.3) states: "At MP 100.0, the Proposed Route crosses to the north side of the existing 345-kV corridor in the Pomeroy Basin before continuing west still parallel to the existing corridor, crossing Commissary Ridge and then the Hams Fork River south of Kemmerer Reservoir." The DEIS contains a similar statement in description of Alternative 4A. The BLM has continued to work with local government to assist in resolving routing issues through Cokeville.

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100804	JASON J AND TRACY THORNOCK		When we commenced construction of our new home in the fall of 2011 just west of the town of Cokeville, the thought never entered our minds that the current proposed alternative was even a possibility even though we had been on the mailing list and attended every available meeting since the beginning of the project. My wife and I were less than enthused when we became aware only last fall that the view and home site that had been 10 years in the making would be forever marred by a 160' tall power line structure right out our front window. When Tim Teichert learned that the proponent intended to survey for the new line in the fall of 2012 on the north side of the existing line it was the first time he had ever heard of that proposed location. If fact he felt that he had been deliberately misled since all previous discussions throughout the process had focused on crossings south of the existing line. Fred Roberts hadn't been previously made aware of the new preferred alternative's location until he got the call last fall to do surveying in his back yard.	Many route alternatives were considered and analyzed in detail for Segment 4. The BLM Preferred Route in Segment 4 generally follows an established utility corridor on BLM-managed lands, and parallels three existing transmission lines for approximately 75 percent of its length. It was also the preferred route identified by the State of Wyoming and Lincoln County in their comments on the DEIS, and generally received broad public support during the DEIS comment period. As noted above, we believe it was clearly identified in the DEIS and FEIS maps and text as north of the existing transmission line through the Cokeville area. The BLM has continued to work with local government as requested to resolve routing issues.
100804	JASON J AND TRACY THORNOCK		We as affected landowners along with the mayor of Cokeville and the county commissioners immediately made known our deep concerns with the new preferred alternative and requested a meeting with a representative of the proponent. Rocky Mountain Power sent Shawn Graff to Cokeville to meet with us and look at the location of the proposed route. We showed him the close proximity to Cokeville, the crossing of a Wetlands Reserve Program (WRP) easement, and two houses (including my own) that would be severely impacted by this route. We reemphasized again as we had done previously that the line would not cross Cokeville Meadows National Wildlife Refuge if moved south, though all of the proponent's and BLM's project maps wrongly label the area as Refuge property.	The BLM continues to work with the Proponents and the local governments to seek a consensus route. The FEIS Appendix A map does not show the proposed NWR expansion area boundary. The detailed maps shown at the public meetings do show the boundary, but it is labeled "NWR Expansion Interest Area (Boundary)."
100804	JASON J AND TRACY THORNOCK		It is interesting that one of the reasons given on the brochure for the location of the preferred alternative through Cokeville is to "Minimize wetland impacts through a better crossing of US 30 and the Bear River near Cokeville". This wetland impact reduction is achieved by putting six or seven 160' tall structures right in the middle of a WRP easement held by the NRCS and within feet of Cokeville city limits and over the top of two residences.	As noted in Section 3.18 of the FEIS, based on data from the NRCS, no Wetland Reserve Program (WRP) lands are crossed by the Proposed/Preferred Route or Route Alternatives. The transmission line would not be placed directly over any residence. The county is responsible for setting siting standards near residences, and the proponents would need to complete the state and county permitting processes to finalize the route across private lands. The BLM appreciates the concern of local residents and is working with local stakeholders and the Proponents to develop a route that avoids impacts to the City of Cokeville.
100804	JASON J AND TRACY THORNOCK		Our only feedback from the meeting with Mr. Graff was that we had indeed met and that it was indeed too late to address our concerns because we were so close to the final EIS publication. After spending two years battling it out on alternative 4F and now faced with publication of the final EIS, it was simply too late to discuss the ramifications of the newly advertised location of the new preferred alternative. At the most recent public open houses in May of this year, it was clear that our meeting with	We appreciate your comment and frustration. The BLM has worked cooperatively with the state and Lincoln County, as well as other local stakeholders, to assess many alternatives in Segment 4. The Preferred Route was given detailed consideration in both the DEIS (as Alternative 4A) and FEIS and commented on extensively by members of the public. The BLM continues to work with local government and landowners as requested to help in this effort.

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			Shawn Graff was insignificant and had gone nowhere. The representatives there were hearing our concerns for the very first time now after publication of the final EIS. We were encouraged once again to “submit a comment before you leave” and received some coaching on proper comment submission.	
100804	JASON J AND TRACY THORNOCK		<p>There simply isn’t a justifiable reason for placing the new line on the proposed route in the Cokeville area. There are no impacts which are being minimized by doing so, in fact the opposite is true. The new line is on the south side of the existing line until it gets west of Kemmerer and then unnecessarily jumps to the north side for reasons that can not be reasonably explained. Sage Grouse impacts, historic trail impacts and wetland impacts are no greater on the south side of the existing line than they are on the north side. The vague explanations for jumping to the north side are based on misinformation at best. Human impacts, WRP impacts and landowner impacts would be greatly minimized by staying south of the existing line and there’s nothing to lose by doing so. As an added bonus, the proponents would not be facing condemnation proceedings against several Cokeville landowners if a more reasonable and sensible route south of the existing line were chosen, even though they would be dealing with several of the same landowners on both sides of the existing line. The proponents can also avoid an unnecessary, costly crossing of the existing line near Kemmerer by simply staying on the south side of the existing line. They would also likely win the support of the town of Cokeville and the Lincoln County commissioners along with those of us who call this area home and will be forced to live with the consequences of the final location of Gateway West.</p> <p>We certainly hope and strongly believe that a better path can be chosen through the Cokeville area south of the existing line. Thank you for your consideration.</p>	Siting issues on private lands will be resolved through the local permitting process. The BLM has no authority to determine the final location of the route on private lands through the Cokeville area. However, as noted above, we continue to work with local governments and the Proponents to resolve these issues.
101113	ROBYN C THOMPSON, ERNIE BREUER		<p>Gateway West Transmission Line Project Segments 9 and 9E: The personal impacts to Ernie Breuer and Robyn Thompson, Oreana, Idaho.</p> <p>February 26th, 2009 we began our journey of education and active landowners solutions to minimize the impact of segment 9 to private property owners, ranchers and farmers in Owyhee County. I have previously submitted a lengthy public comment dated October 22nd, 2011 primarily regarding the multiple impacts to landowners of segment 9 so I will not be redundant.</p>	Your previous comments on the impact of segment 9 to private property owners, ranchers and farmers in Owyhee County are included in Appendix L of the FEIS. Effects to property values are discussed in Section 3.4 of the FEIS. Effects to agriculture are discussed in Sections 3.4 and 3.18, as well as in Appendix K.
101113	ROBYN C THOMPSON, ERNIE BREUER		<p>We purchased a home September 2004 that is now in the 2 mile wide WWE Corridor of segment 9.</p> <p>We were present at all meetings of the Owyhee County Task Force of which alternatives 9 D and 9E evolved with the inclusion of Idaho Power, Tetra Tech BODBLM and Owyhee County BOCC. We know exactly where the 2 mile wide WWE Corridor is on the map as well as the 2-mile swatch for the</p>	The BLM did not identify a Preferred Route in the DEIS. As stated in that document, the Proposed Route, which followed Highway 78, was the Proponent's preferred route; it was not indicative of the Agency's preference. The BLM Preferred Route was selected, in part, in response to comments on routes and issues presented in the DEIS. Alternative 9E was originally

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			County Commissioners proposal of 9E. [see PDF for image] We purchased land Feb 2011 for the sole purpose to escape from living in the WWE Corridor and Segment 9 Gateway West. We have worked tirelessly to build our new nest; spending months cleaning up trash, moving an old home off the property, building a brand new home (doing 1/3 the amount of work ourselves) and erecting a 60' x 50' R&M Steel Building OURSELVES, an ambitious undertaking for a 67 year old man and 54 year old woman. We have done much of this work ourselves because we had to in order to financially pull off this endeavor. Our bank accounts are both now depleted all in order to escape Gateway West. You can imagine our devastation as we have become aware of BLM's significantly altered proposed 9E, the centerline right between our new home and that our our closest neighbor.	proposed by the Owyhee County Task Force as a second option, although they stated that it was not their recommended choice. Alternative 9E was revised between the Draft and Final EIS to avoid preliminary priority sage-grouse habitat and to avoid impacts to a new subdivision near Murphy. We are sorry that this has caused confusion and hardship for you. The BLM will continue to work with local interests to find a consensus route.
101113	ROBYN C THOMPSON, ERNIE BREUER		This is a huge injustice to say the least. It flies in the face of fairness and decency to so substantially impact citizens. The mission of the Owyhee County Task Force was to protect EVERY landowner in Owyhee County and we actually managed to do that with OUR submitted alternatives. Alternative 9E is still the alternative that has 100% support of the landowners in Owyhee County and the Owyhee County BOCC because of the minimal impact to private property rights, agriculture, our economy, our history, our culture and our health. During the development of Alternative 9E one of the Tetra Tech maps mistakenly took the course that the current BLM Alternative now takes. The property owners on Bachman Road, Bates Creek Road and on Sinker Creek flamed out, justifiably so. The Owyhee County Task Force caught the mistake during this process and saw to it that these Oreana and Murphy property owners were protected. None of these property owners have changed their minds regarding the siting of Gateway West. Only 17% of Owyhee County is privately owned. The new BLM proposed alternative would hugely affect two or more homes on Bates Creek Road wherever you place Gateway West in the 2-mile wide corridor. All of these properties are agricultural. The BLM's new proposed 9E will negatively impact our ability to irrigate, fences will have to be grounded to reduce hazards to livestock. All of these properties have cultural/historic significance. The Jess ranch has been family owned since the early 1900's. Paul Nettleton's (the Joyce Ranch) is family owned/operated since 1865; the longest family owned ranch in the history in the state of Idaho. Folks have been running cattle through our property, as long as there have been cattle in Oreana.	Effects to property values are discussed in Section 3.4 of the FEIS. The BLM does not have the authority to permit the Project on private lands. The Proponents would need to complete the state and county permitting processes and negotiate with individual landowners during final siting. Alternative 9E crossed 3.3 miles of private property and is not within 1,000 feet of any residence. Alternative 9D, the County's preferred route, crosses the same amount of private property as Alternative 9E and like 9E, is not within 1,000 feet of a residence. Effects on agriculture are discussed in Sections 3.4, 3.18 and Appendix K. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM will continue to work with local interests to search for a consensus route.
101113	ROBYN C THOMPSON, ERNIE BREUER		Every US Citizen is painfully aware of the downturn of the economy and the loss of wealth to every homeowner/landowner in the state of Idaho. Two of our new neighbors spent over 4 years attempting to sell their properties on Bates Creek Road. Both property owners had to settle for leasing their homes/properties at a much reduced rate from their initial asking price. We already cannot recoup our money if we try to sell either one of our Oreana properties. The BLM Preferred Alternative is not going to "sweeten the deal". The potential for any future wealth, income	Effects to property values are discussed in Section 3.4 of the FEIS. The BLM does not have the authority to permit the Project on private lands. The Proponents would need to complete the state and county permitting processes and negotiate with individual landowners during final siting.

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			is also stricken for us. Our option to subdivide our property in our old age to sustain us financially is being stolen from us.	
101113	ROBYN C THOMPSON, ERNIE BREUER		Last but not least and sadly the only point that has the potential to be effective is the Sage Grouse issue. We are aware in Owyhee County that the plight of the Sage Grouse is "delicate". The addendum to the DEIS "Effects of the Proposed Project on Greater Sage Grouse" well documents the negative effects of 9E (as well as 9) to Sage Grouse. Moving Segment 9E 3 1/2 miles onto our private property does not negate this effect. The BLM has a seasonal road closure on the Federal Land just to the south of all the private land of the new 2 mile corridor of the BLM's altered 9E. [see PDF for image] The BLM cannot have it both ways! They cannot close roads due to Sage Grouse habitat and then run a 500 KV line right over said property. That is preposterous!!! Thank you so much for attention and efforts in regards to this most pressing issue. [Attachment letter 101111] [Attachment letter 100692]	Alternative 9E generally avoids the preliminary priority sage-grouse habitat (PPH); approximately 7 acres of PPH would be affected due to improvements of existing roads based on indicative engineering. Final design will endeavor to avoid any impacts to PPH.
101112	CHARLES A STROM		STAY OUT of the Neeley Area!! WE have a good quality of life here, lots of Eagles, hawks, Pheasants, etc.	Your opposition to Alternative 5D is noted. This is not the route alternative being considered by the BLM for its Preferred Route.
101112	CHARLES A STROM		We had a guy come ask our opinion, we told him we were totally against it! We have written comments at least 3 times, the last ones were sent to Doug Balfour. The last meeting I attended there were lots of people there who had sent in comments, but in the book with comments none of us were listed! Do you just throw these away? A man and a lady checked on their lap tops but still could not find our names.	We apologize for the confusion with your comment submittal. Comments submitted for the AFEIS were not included in the DEIS Appendix L. In addition, at the time of your query, we did not know these comments were submitted to Doug Balfour. We do not track comments submitted to individuals not acting in an official BLM capacity; however, Mr. Balfour did submit comments on behalf of individuals, these are included in the FEIS comment response under Letter #100681.
101112	CHARLES A STROM		This line is just to make more money for administrative and stock holders! The power will be put on the grid to be sold to the highest bidder (probably California). If they want the power let them build it in their state!	Comment noted. The Proponents' objectives for the Project is stated in Section 1.3 of the FEIS.
100653	W GREG NELSON	CITY OF KUNA	I am writing to protest BLM's re-alignment of the Gateway West Project through the City of Kuna (Alternative 8B) rather than the Idaho negotiated and accepted preferred route (8C) through the northern portion of the Morley Nelson Birds of Prey National Conservation Area (NCA). Since BLM at this point has not provided specific detailed maps of the area, we believe we are correct in our judgment that the 8B alternative route will include private lands within the city limits of Kuna. Such a large electrical line passing through neighborhoods within our city will definitely adversely impact our community.	Your opposition to Alternative 8B of the BLM's Preferred Alternative is noted. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Proponent's Proposed Route for Segment 8 and other Alternatives for Segment 9 that crossed the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM is continuing to work with local governments on a consensus route.

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100653	W GREG NELSON	CITY OF KUNA	We were informed that the National Landscape Conservation System is the agency that insisted the route be altered based upon a misguided belief that a power line in the NCA would somehow be deleterious to raptors or perhaps would take away from the visitors NCA experience. This belief of raptor problems is certainly not supported by science or BLM's own biologists, and any review of the interaction of raptors and power lines within the NCA would find that the birds are using the power lines and poles to their advantage in both nesting and hunting. Morley Nelson's research in the NCA and his guidance regarding power lines ended problems between raptors and electric lines. Certainly his research and attention to details involving this national treasure is what triggered the naming of the NCA in his honor. I am not familiar with any expertise on the subject being resident in the National Landscape Conservation group so perhaps they could acquaint themselves with the issue.	The BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. Your disagreement with this finding on the enabling legislation is noted.
100653	W GREG NELSON	CITY OF KUNA	In addition, the withdrawal of lands into the NCA had as its only mission to promote "conservation, protection and enhancement of raptor populations and habitat". Language also stated that the management of the NCA should allow for diverse appropriate uses of land in the area to the extent consistent with maintenance and enhancement of raptor populations and habitat. I do not recall the area being set aside for the benefit of human visitors, although the Gateway West line crossing the far northern portion of the NCA would barely be noticed by visitors as they traverse 15 miles south on Swan Falls Road to visit Dedication Point and the nesting areas in the cliffs overlooking the Snake River Canyon or other parts of the 482,000 acre NCA.	Management direction for visual resources and recreation in the SRBOP NCA is found in the Resource Management Plan.
100653	W GREG NELSON	CITY OF KUNA	I find it ludicrous that after countless hearings, negotiations, expenditures, travel and time invested in determining the preferred 8C route, the National Landscape group should summarily shove aside the settlement as if they have a better grasp of the science and aesthetics involved than those hundreds of participants that hammered out the best route for the Gateway West Transmission line. As the gateway city to the Morley Nelson Birds of Prey National Conservation Area, Kuna is host to many visitors on their way to the NCA. We encourage birding and photography, for there are no better places in the United States to actually observe raptors and experience the beauty, loneliness and fulfillment of a high desert plateau with soaring eagles, hawks, falcons and other birds of prey. Should a visitor encounter an eagle sitting on a power pole, rather than shrink in horror at the site, I would guess cameras would quickly record the event and the thrill of that photograph would become an integral part of that families experience on their wonderful visit to Idaho. In closing, we would ask that BLM reconsider its decision to back the Landscape Conservation group's use of Alternate 8B for the alignment of the Gateway West Transmission Line and return to the negotiated and agreed upon alignment that passes through the far north portion of the Morley Nelson Birds of Prey National Conservation Area, (8C.)	Your opposition to Alternative 8B of the BLM's Preferred Alternative is noted. As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Proponent's Proposed Route for Segment 8 and other Alternatives for Segment 9 that crossed the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA.

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100653	W GREG NELSON	CITY OF KUNA	In closing, we would ask that BLM reconsider its decision to back the Landscape Conservation group's use of Alternate 8B for the alignment of the Gateway West Transmission Line and return to the negotiated and agreed upon alignment that passes through the far north portion of the Morley Nelson Birds of Prey National Conservation Area, (8C.)	As stated in the FEIS (Section 2.4.1.1), the BLM found that the proposed mitigation and EPM measures provided for the Segment 8 and Segment 9 routes that crossed through the middle of the SRBOP were not sufficient to meet the enhancement requirement of the enabling legislation of the NCA. The BLM is required to follow the law. The BLM is continuing to work with the local governments and interested parties.

Notes:

1/ Karagianes Family Living Trust, Klar LLC, Owyhee Pioneer Cemetery District, Narragansett Properties LLC, Tereco, Boyd & Loa Anderson LP, Carousel Farms, Sundance Dairy, Reynolds Irrigation District, FAAM Inc, Clinton Agenbroad, Lonnie Agnew, Sherry Agnew, Karen M Anderson, Wesley Anderson, Robbin Anderson, Boyd Anderson, Robert Anno, Marianne Baer, Adrian Barker, William A Berry, Beverly E Morris Family Llp, Kenneth G Billings, Steve & Darlene Bills, Vera Ethel Blanksma Life Estate Attn: Mary Ellen Taggart, Herbert Blaser, Guy Bourgeau, George A Bouvier, Joyce Burch, James W Burch, Douglas Campbell, Bryan Campbell, Lloyd Capley, Merle And Linda Carlsgaard, James Carpenter, Renee Carlene Carpenter, Eric Child, Michael Christensen, Justin Christensen, Lorne Clapson, Elvin Leo & Una Cloyd, Geraldine Coleman, Pedro Colunga, Lee B Cook, Robert C Cooley, Wendy Cornwell, Altamazie Costen, Jacob Crossley, F James And Jenny L Dayley, Abraham De Vries, Curtis R Derr, Curtis Devries, Matt Dicken, William (Bill) Edwards, Kenneth Arlen Farner, Richard & Sue Farner, Duncan Farris, Dennis M Fisher, Robert Flood, Richard Fraser, Jennifer Fraser, Robert French, Thomas & Peggy Friddle, Richard Friddle, Kira Frost, Charles Frost, Milton R Gant, Tami Gail Genton, Rick T George, Gina Marie Gildone, Laura B Gilmore, Evelyn Rae Grimes, W R & Winona M Hackbarth Trust, Terry L Hall, Don Hamilton, Darrell L & Terri L Haney, Richard D Hansen, Merritt Harker, Roderick Hartwell, Brett Hatfield, Donald Heida, Lynn Heiner, Jack & Phyllis Henderson, Michael Hess, Brad Hewlett, Eldon Hinrichs, Greg E Hoagland, Donna B Hoagland, Jerry Hoagland, Saul Huerta, Latisha Hulet, Travis Hulet, Wilma Humphries, Kay Hylton, Kay Hylton, Richard & Dixie Isenberg, Sera Jakis, Marion James, Dave Jenkins, Cordalee Jensen, Norman R Jensen, Lavinda Johnson, Rick Johnson, Chad And Colette Jones, Bonnie Kanfman, Edward Kanfman, George & Shirley Katsikaris, Dean J Kearl, Gary & Linda Keithley, B Thomas & Julie A Kelly, Steven C Kimball, Robert E Knapp, Neal Koyle, Kelly And Vicky Kramer, Mitchell Lathrop, Michael Leavitt, Kelli Leavitt, Leonard Loper, Julianne Lostra, David Lowry, Lois Lowry, Barton Fred Lyons, Ron Mackey, Joahn Maglecic, Jay Martin, John Mc Dorman, Perry McCormack, Gail McCormack, James R & Teresa L McCoy, Linda Mccuskey, Dan Mccuskey, Larry McDorman, Gordon Mcmorris, Ronald McMurray, Anthony Miller, Richard Miller, Terry Miller, Jeffrey Moe, Carolyn Moon, Carrie R Moore, Craig Moore, Keith Moore, Georgene Moore, Anna Marie Morehead, Rick & Kristi Morino, Matt Morris, Beverly Morris, Patricia A Mortell, Michael T Mortell, Jon Mortensen, Robert Nettleton, Steve Nettleton, Scott Nicholson, Thomas Nicholson, Lloyd And Joan Noe, Ralph Noe, James Obert, L Clark Olsen, Brett Oman, Ann Pardew-Peck, Michael D Pecil, Greg Perry, Kenneth L Phillips, Sam Pitman, Rose Pitman, Robert Proesch, Ivan Pupilidy, Josiah Rausam, Frank Richardson, Benjamin Richeson, Tyler Risen, Debbie Risen, Anna Rogers, Rex And Debra Runkle, Lee Rush, Ken Salazar, Gregory Sanchez, Louis & Deanna Sanchez, Brandon Schmeckpeper, William F Schroeder, Kathleen Senn, Trina Shelman, Jerry Silva, Jerill Sjaastad, James And Maryann Slegers, Burl J Smith, Earnest Stanley, Mark Stein, Randolph Steiner, Russell Steiner, Clayton Stewart, Chris Stewart, Jon Stosich, W Eugene Strate, Judy Strother, Michael Stukel, Lonnie And Lynne Svedin, Ellen Kaye Svedin, Sidney Swails, Ramona Sword, Harold Ray Tabor, Melissa Tabor, Don Taylor, Thomas Thibavult Sr, Lavar Thornton, William Tippetts, Dean & Reva Tobias, Lanita Vance, Mary Jane Vetter, Richard L Vetter, Terry Vollman, Wilson R Vollman, Jim & Naidene Wegener, Richard C Williams, C Dale Willis Jr, Deanna Wirz, Kenneth Wirz, Phyllis Wood, Dan Woodruff, Duane Yamamoto, Jimmy Young, Magdaleno & Elva Zavala, Becky Zimmerman, Gordon Thomas Zimmerman, John Zrofsky

2/ C T Properties LLC, Farris Cattle Company Llc, Robinson R I Honey Co Inc, Double C Farms, Lyons Idaho Investment LLC, Lyons Development, LLC, Boyd & Loa Anderson Lp, Basin Fertilizer And Feed, Anderson Enterprises, Walter's Butte Grange, Sundance Dairy, Mtb Farms, Reynolds Creek Calf Ranch, Robert Proesch Farms, Hoagland Farms, Tabor Farms, Karen M Anderson, Robert Anno, Robert And Nancy Anno Living Trust, Herbert Blaser, Lloyd Capley, Merle And Linda Carlsgaard, Renee Carlene Carpenter, Eric Child, Jeanette & Jacob Crossley, David And Barbara Doan Trust, Chris Drakos, Kenneth Arlen Farner, Duncan Farris, Thomas & Peggy Friddle, Kira Frost, Scott & Zoeann Greenfield, Evelyn Rae Grimes, Betty Hamilton, Don Hamilton, Cyndy & Merritt Harker, Vicki Hartwell, Roderick Hartwell, Brett Hatfield, Marci Hatfield, Dana Hennis, Greg E Hoagland, Donna Hoagland, Wilma Humphries, Steven Hylton, Kay Hylton, Rick Johnson, Chad Jones, B Thomas & Julie A Kelly, Richard Kershner, Mary Kessinger-Hennis, Kelli Leavitt, Michael Leavitt, Deanna Lewis, Barton Fred Lyons, Kathleen Mallory, Stephen Mallory, Louis Monson, Craig Moore, Rick & Kristi Morino, Beverly Morris, Matt Morris, Michael T Mortell, Jon Mortensen, Robert Nettleton, Steve Nettleton, Edith Nettleton Testamentary Trust, Lawrence & Suzanne Nixon, Elsa Obert, David L Palfreyman, Rosie Peck, Julio Pineda, Alice & Paul Pline, Robert Proesch, Ronald & Rosa Rogers, Anna Rogers, Louis & Deanna Sanchez, Gregory Sanchez, William F Schroeder, Jerry Silva, Jerill Sjaastad, James and Maryann Slegers, James Spengler, Michael Stukel, Ellen Kaye Svedin, Sidney Swails, Harold Ray Tabor, Layne Thornton, Lavar Thornton, Wilson R Vollman, Terry Vollman, Tom White, Wilma Wilhite, Richard C Williams, Gordon Thomas Zimmerman