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From: Nancy Baker <nbaker@ppcpdx.org>
Sent: Thursday, March 19, 2015 2:45 PM
To: comment@boardmantohemingway.com
Cc: Scott Corwin
Subject: Public Power Council comments on Draft EIS for the Boardman-to-Hemingway Project
Attachments: 150319 PPC B2H DEIS Comments.pdf

Please find attached PPC's comments. If you have problems with the file or questions about the comments, please contact me at your earliest convenience.

Best,
npb

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March 19, 2015

VIA EMAIL

Boardman-to-Hemingway
Transmission Line Project
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RE: Public Power Council's Comments Regarding the Boardman-to-Hemingway Draft Environmental Impact Statement

Dear Gentilepersons:

On Dec. 5, 2014, the Bureau of Land Management (the Bureau) published its Draft Environmental Impact Statement (DEIS) regarding the Boardman-to-Hemingway Transmission Project (B2H Project). Public Power Council (PPC) appreciates the opportunity to comment on the DEIS. Overall, PPC supports the findings in the DEIS. PPC's comments principally address the DEIS findings regarding the alternatives for the northern terminus of the B2H Project and the purpose of and needs for the B2H Project related to reliable electric load service.

PPC is a non-profit trade association that represents the common interests of more than 90 public utility districts, municipal electric utilities and cooperative electric utilities that serve retail customers across the Northwest. All PPC members purchase electric power from the Bonneville Power Administration (BPA) to serve their retail loads and each member has a statutory preference to do so. BPA is a cooperating agency in the DEIS process and would use the Final EIS to support a decision whether to invest in the B2H Project if the Project moves forward. PPC's members have a large stake in BPA's ability to deliver power to its publicly owned utilities in the most cost-effective manner after consideration of the best alternatives available to it. The B2H Project is one of the alternatives that BPA would consider as a means of serving its publicly owned customers located in Idaho, Nevada, and Wyoming. Consequently, PPC members have an interest in the successful completion of the environmental review process related to the B2H Project.

The DEIS analyzes the potential impacts on the natural and human environment of the construction of the B2H Project. Generally stated, the B2H Project is a proposed single-circuit, alternating-current, 500-kilovolt overhead electric transmission line with ancillary facilities that would connect an existing substation in Melba, Idaho, with an existing or new substation near Boardman, Oregon. The B2H Project would be owned by Idaho Power Co.¹ BPA has an interest in potentially participating in the construction and ownership of B2H Project facilities; one of the stated federal "needs" for the DEIS is to support BPA's future decision regarding whether to participate in the B2H Project:

¹ See generally, *DEIS*, § 1.1, p. 1-1.

BPA has electric power supply and transmission service obligations that serve six preference customers (i.e., those customers with preference status under the Bonneville Project Act) located in southeastern Idaho. BPA currently meets those obligations through contractual arrangements with PacifiCorp. In June 2011, PacifiCorp gave BPA notice that it will terminate those contractual arrangements in June 2016. BPA is now considering various options for replacing those arrangements and continuing to serve southeastern Idaho customers after June 2016. One potential option would be for BPA to participate in the proposed B2H Project as a joint owner and to acquire partial ownership in other existing transmission facilities in the region so that BPA could have sufficient ownership of power transmission between the Federal Columbia River Power System and its southeastern Idaho customers.

Accordingly, BPA will use this Draft EIS to help support any decision concerning its need to participate in the B2H Project to continue serving its customers in southeastern Idaho. In evaluating the need for action, BPA will consider the following purposes:

- Maintain BPA's transmission system reliability and performance
- Meet BPA's contractual and statutory obligations
- Minimize impacts on the environment
- Minimize costs while meeting BPA's power and transmission service needs²

As noted in the DEIS, BPA has "special expertise in electrical power generation and transmission"³ and legal obligations to serve its publicly owned utility customers at the lowest reasonable cost. We strongly support the Bureau's reliance on and deference to BPA in determining the electrical impacts of the various alternatives.

The DEIS considers four alternatives for the northern terminus of the B2H Project: the Proposed Alternative, the Longhorn Alternative, the Horn Butte Alternative and the Longhorn Variation Alternative. Each of these represents different routes to one of three potential terminal substations, Grassland (for the Proposed Alternative), Longhorn and Horn Butte. The Longhorn substation would be built by BPA prior to the interconnection of the B2H Project; the two Longhorn alternatives represent two different line routes to reach the Longhorn substation.⁴ Of the four alternatives Longhorn Variation Alternative best meets the purposes and needs of the participating agencies, including BPA. The Longhorn Variation Alternative best mitigates the environmental impacts of the B2H Project while also meeting the purpose and needs of coordinating federal agencies.

- DEIS concludes that the Longhorn Variation Alternative is the Environmentally Preferred Alternative and the Agency Preferred Alternative for the Morrow-Umatilla segment and northern terminus (Segment 1).⁵
- Along with the Longhorn Alternative, the Longhorn Variation Alternative has the least impact on vegetation and on habitat for the Washington ground squirrel, the only identified candidate

² DEIS, § 1.2.6, p. 1-6 - 1-7.

³ DEIS, § 1.2.6, p. 1-6.

⁴ DEIS, §§ 2.3.1.2 & 2.3.1.3, p. 2-54 – 2-55. BPA has not yet decided whether to build the Longhorn substation.

⁵ DEIS, Summary, p. S-25 – S-26.

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species in Segment 1. In contrast, the Proposed Alternative and Horn Butte Alternative have greater impact on both vegetation and suitable habitat for Washington ground squirrels.

- The Longhorn Variation Alternative addresses the concerns raised by the U.S Department of Navy regarding the Longhorn Alternative's encroachment on military airspace.
- The Longhorn Variation Alternative also minimizes the impacts to agriculture, and is aligned with an existing transmission corridor.
- From an electrical perspective, the Proposed Alternative and Horn Butte Alternative are less desirable for BPA, as they provide no direct interconnection to the BPA system.

This last point is a very important factor in assessing the ability of the Proposed and Horn Butte Alternatives to satisfy the purpose and need statement. A direct connection would provide BPA's access to the transmission capacity at the northern terminus required for any transfer of power to its publicly owned customers in Idaho, Nevada and Wyoming. This provides BPA with the greatest certainty of being able to use the B2H project capacity without impediment and without additional costs, should BPA decide to use the project to serve those utilities. The other alternatives require BPA to pay other entities for access to the line and to run the risk of insufficient capability for its needs. For this reason, we conclude that the Longhorn Variation Alternative best satisfies BPA's needs to (a) meet its contractual and statutory obligations, (b) minimize impacts on the environment, and (c) minimize its costs while meeting its power and transmission service needs.

PPC supports the Bureau's conclusions regarding to the environmental impacts of the different potential routes of the B2H Project and their ability to meet the purpose and needs of the Bureau and the cooperating federal agencies. PPC concurs with the DEIS that the Longhorn Variation Alternative is the best option for the northern terminus of the B2H Project. PPC appreciates the opportunity to comment on the DEIS and looks forward to reviewing the Bureau's Final EIS as the process moves towards completion.

Sincerely,



Senior Policy Advisor

cc: PPC Executive Committee Members and Alternates
PPC Members