

comment@boardmantohemingway.com

From: Jere and Jan KRAKOW <jlkrakow@msn.com>
Sent: Tuesday, March 17, 2015 10:55 AM
To: comment@boardmantohemingway.com
Subject: B2H Comments
Attachments: B2H.DEIScomments.docx

Vale BLM,

Attached are the comments from the Oregon-California Trail Association (OCTA) written by Jere L. Krakow, National Preservation Officer of OCTA.

thanks,

Jere L. Krakow
National Preservation Officer
Oregon-California Trail Association
505-828-0309

March 16, 2015

Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, Oregon 97918

Re: Boardman to Hemingway Transmission Line Project

For several years the Oregon-California Trails Association (OCTA) through the Northwest Chapter has been monitoring and commenting on the proposed Boardman to Hemingway Transmission Line Project (B2H). Our concerns are many as the transmission line will compromise the Oregon National Historic Trail and Goodale and Meeks Cutoff routes in many locations and in a variety of ways.

OCTA appreciates the vast amount of time and budget committed by the BLM/Vale office to assessing the potential impacts of the transmission line and the many alternatives routes that have been proposed and studied. The challenges are many for BLM as a multi-use agency in the Department of Interior. OCTA values the energy produced on public lands and the transmission of energy to distant locations. Our voice is a very significant one as the association advocating for the historic trails in Oregon and Idaho, among many other western states. BLM has been an important partner and manager for historic trails resources. Many decades of working together bears testimony to the partnering efforts of the BLM and OCTA.

As a nonprofit, OCTA has demonstrated the priority mission of preservation of historic trail resources throughout the length of the many routes used by emigrants and gold seekers during the nineteenth century. The engagement of OCTA is many fold with hundreds of volunteers and thousands of hours of volunteer time and thousands of dollars contributed. In 2014 the volunteer hours and money contributed by OCTA totaled 100,379 hours valued at \$2,263,546, and contributions of \$686,060. Nationwide the volunteer hours alone in 2014 totaled 1,054,022 for the National Trails System, with a value of \$23,768,196, according to the nonprofit Partnership for the National Trails System.

In reviewing the 2000+ pp. of the DEIS it is very clear that the public interest of the entire project has not been validated. On p. S-2 of the DEIS, it states,

“The B2H Project is neither required to support any particular new power generation project nor justified by any particular existing power generation project. Rather, the B2H Project would meet IPC’s obligations to meet Federal Energy Regulatory Commission, Oregon Public Utility Commission, and Idaho Public Utility Commission requirements.”

OCTA strongly believes the public interest has not been demonstrated. Without the public interest being met the entire proposed project is called into question. The power utility companies need to go back to that fundamental point and demonstrate the need.

The purposes and nature of national historic trails are incompatible with linear transmission facilities. The potential adverse effects destroy the very values that Congress intended to preserve when the Oregon Trail through legislation, was designated a National Historic Trail. The result OCTA seeks is “no net loss” of the values for which the trail was designated.

The project proponents have not conducted a thorough public process that results in the determination that the project is needed let alone that the B2H as proposed is an environmentally acceptable method for meeting the yet to be determined need. With the adverse impacts poorly described, no cumulative impacts quantified, and without a mitigation plan for a resource that is non-renewable (gone forever when compromised), inadequate mitigation is very prominent in the DEIS. If a renewable resource, Sage Grouse, has a mitigation plan then a non-renewable resource like those of the Oregon Trail, Goodale and Meeks Cutoff and their associated sites and setting, deserves mitigation too.

Mitigation Planning (3.2.8.9) needs to be fully developed in the DEIS text and not delayed by proposed avoidance measures in various agreements (Appendix G). “No net loss” of resources is the key element of impacts at on-site locations, and off site, if necessary. The critical development and design stage of the project is when mitigation should be the focus. Land acquisition for unprotected Oregon Trail resources is a priority in mitigation for OCTA, and if residual impacts are unaddressed, a cash offset by the project proponents needs to be developed.

At each and every transmission line crossing of the Oregon Trail and the Goodale and Meeks Cutoff, being studied through congressional act, the DEIS does not fully address the impacts nor does it address the cumulative impacts of each crossing and the total cumulative impacts aggregated, of the entire project. In the DEIS is the 20130829 Historic Trails Map Assembled, and the maps make it clear as to locations of the adverse effects. When the BLM Manual 6280, a touted document, underscores the monitoring and “best uses” and the DEIS with maps noted

above, does not give consideration to protecting historic trail resources, the assessment of impacts is shallow and almost nonexistent. Towers with heights of 165-195 feet along a route nearly 305 miles in length, and the associated project elements of cables, construction roads, access roads, maintenance facilities, fencing, borrow pits, lights, invasive species, off road vehicles, chain-link fences, cleared land, and visual and auditory impacts, all add up to a huge number of cumulative impacts. In short, hundreds of square miles will be required by the massive B2H project. The DEIS clearly does not speak to the cumulative effects, and is absent the analysis expected in a transmission line project, particularly one of the magnitude proposed.

It is not clear that the BLM has incorporated the “high potential sites” and “high potential segments” underscored in the National Trails System Act (1968, as amended 1978) that are identified in the *Comprehensive Management and Use Plan* update (1999) for the California, Pony Express, Oregon and Mormon Pioneer National Historic Trails. Attention to that planning document is critical for projects that may threaten historic trail resources.

Particular locations where negative impacts of the transmission line are visible

- north of Vale to Alkali Spring, and the crossing at North Vale.
- At Alkali Springs the transmission line visible to the south about 1.7 miles, and to the northeast through the gulch east of the roadway
- Tub Springs – tower tops visible to east
- Willow Springs – towers are visible across Love Reservoir
- Willow Springs where east of the transmission line is visible
- Burnt River – north Huntington visible on ridge across canyon
- Riber Creek to Chimney Rock – visible as when trail climbs out of canyon
- Birch Creek transmission line off of I-84 all the way to Farewell Bend
- Dixie – high visibility in canyon
- Jordan Creek – high visibility in canyon
- Burnt River – high visibility
- Swayze Creek – crossing with high visibility
- Durkee – visible up Durkee Creek for 1 ½ miles
- Pleasant valley – crossing with high visibility, and north of crossing to Virtue Flat
- Virtue Flat – alternate route very visible leading to Flagstaff Hill
- Flagstaff Hill – highly visible below interpretive Center
- Clover Creek – high visibility near I-84 crossing
- Ladd Canyon – approaching it
- Ladd Hill – visible to west several miles

- Hilgard State Park – visible due west, and to south from ridge across from park
- Blue Mountain Crossing – tops of towers somewhat visible (use ridges to hide towers)
- Meacham – occasional visibility
- Wells Spring – visible to south, at interpretive panels of wayside; and west toward Ella; and the impact of trail resources at the Boardman Bombing Range
- Meacham -occasional visibility
- Longhorn Variant – visible on east boundary
- Four-Mile Canyon – very visible
- Willow Creek – very visible in creek; intermittent visibility to Willow Creek

Alternate routes need to be employed for the transmission line project wherever possible to minimize visual impacts to the trail setting. Especially troubling are the many adverse effects in and around Flagstaff Hill and the National Historic Oregon Trail Interpretive Center. The setting extends for miles and the experience of visitors at the center is critical to the story of the Oregon Trail. It is a top quality experience that should retain the trail setting as much as possible and it is a place where BLM has showcased the Oregon Trail and the Goodale Route. OCTA opposes the “preferred routings” identified in the supplemental maps of the DEIS.

Furthermore the guidance in BLM Manuals 6250 and 6280 concerning landscapes and setting are in effect and need be used in the management of historic trail resources. These management manuals need be fully integrated into the DEIS for a project of the magnitude of the B2H.

OCTA appreciates the opportunity to comment on the DEIS and anticipates being fully engaged in the next steps of the B2H project.

Sincerely,

Jere L. Krakow
National Preservation Officer
Oregon-California Trails Association