

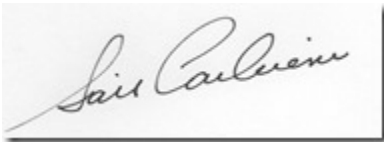
comment@boardmantohemingway.com

From: Gail C <mcgcarb@bendbroadband.com>
Sent: Thursday, March 05, 2015 5:20 PM
To: comment@boardmantohemingway.com
Cc: Jennifer Theisen: BLM; Tamara Gertsch: BLM-B2H
Subject: Re: Boardman to Hemingway Draft EIS Comments
Attachments: B2H Draft EIS Comments rev 3-6-2015.docx

Mr. Jerome Perez
BLM State Director
Oregon and Washington

These are my comments for the Draft EIS for Boardman to Hemingway Transmission line dated March 6, 2015.

Gail Carbiener
19506 Pond Meadow Ave.
Bend, OR 97702

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March 6, 2015

Gail Carbiener
19506 Pond Meadow Ave.
Bend, OR 97702

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

Via email: comment@boardmantohemingway.com

Re: Boardman to Hemningway Draft EIS Comments

Please accept these additional comments to the Draft EIS for the B2H Transmission Line project.

Comment #1: The BLM has accepted Idaho Power's opinion that a route through Oregon and Idaho via existing transmission corridors from the Columbia and Snake Rivers to Boise area is not possible. This corridor runs from Walla Walla, tp Wallowa, Enterprise, Midvale and on into Boise.

Part of this route may have been suggested in 2009 as part of the Community Advisory Process (CAP), and in Appendix E – Idaho Power said it was not willing to build routes east of Boise. The Treasure Valley Electric Plan was only a small part of this suggested route.

Times have changed, the Gateway West project has received BLM approval, which was one of the IPC concerns. The BLM needs to have IPC consider this route utilizing current corridors all the way from Boardman to Boise. IPC stated that this route would require **joining Gateway West and B2H, and increases the risk of both projects failing to meet the in-service dates and places peak load service at risk.**

The BLM must have IPC present "hard data" on how they arrived at this conclusion. For example what requires IPC to perform additional construction? The route eliminates Sage Grouse concerns and National Historic Trail concerns.

Comment #2: I refer to the National BLM Web-site 40 CFR 1502: Environmental Impact Statement:

Section 2: Implementation: Among other points (f) states; Agencies shall not commit resources prejudicing selection of alternatives before making a final decision.

In 3.1.2.2 the BLM has employed consultants to evaluated the amount and locations of ground-disturbing activity associated with the B2H Project based on the descriptions of project construction, operations, and maintenance activities in IPC's November 2011 Revised Plan of Development, and they determined the types, duration and intensities of impacts that could occur on the land. Visual Resource analysis, Wildlife, Vegetation, and other extensive resources have been committed to only the BLM Environmentally Preferred Route and two or three closely related alternatives.

40 CFR 1502. 14 In this section agencies shall:

- a) Rigorously explore and objectively evaluate all resonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

No evaluations were done to determine effects based upon possible alternatives that the public has not had a chance to compare. In addition, the DEIS says final requirements will be built into the IPC Plan of Development, not yet knowing if requirements are possible.

The BLM has not met NEPA requirements to evaluate a reasonable range of alternatives.

Comment #3: 3.2.8.1 Considerations for Defining Cultural Resources
3.2.8.2 Regulatory Framework

There is no reference to the National Historic Oregon Trail and leaves one to hunt through the definitions to insure that it has been included. Without written reference, it is suspect that the DEIS authors considered the resource.

There is no reference to the Secretary's Order No. 3330 issued on October 31, 2013 or the resulting "A Strategy for Improving the Mitigation Policies and Practices of The Department of the Interior." Cultural Landscapes may be new to the BLM, but need to be part of the environmental considerations for B2H.

Cultural Landscapes provide a sense of place and identity; they map our relationship with the land over time; and they are part of our national heritage and each of our lives. They are sites associated with a significant event, such as the Western Expansion to Oregon over the Oregon Trail.

Neglect and inappropriate development put our irreplaceable landscape legacy increasingly at risk. Too often today's short-sighted decisions threaten the survival and continuity of our shared heritage. The ongoing care and interpretation of these sites improves our quality of life and deepens a sense of place and identity for future generations.

The two sections (3.2.8.1 and 3.2.8.2) are not unique as they appear in other DEIS within both Oregon and Idaho. The BLM must add to these sections the following elements for analysis:

- 1) The BLM must greatly widen the Cultural Landscape Scale for B2H impact consideration, 5 miles on either side of the center line is much too small an area for regional consideration.**
- 2) The BLM must modify cultural resource analysis from site by site to comply with Order 3330 which directed DOI agencies to "avoid potential environmental impacts from projects through steps such as advanced landscape-level planning that identifies areas suitable for development because of relatively low natural or cultural resources conflicts."**
- 3) The BLM must determine how to apply the Strategy for Improving the Mitigation Policies and Practices of The Department of the Interior to the B2H project.**
- 4) The BLM must place a value on the permanent loss to the Oregon Trail, including cumulative future impact.**
- 5) The BLM must determine specific compensatory mitigation requirements as a condition of a permit to be issued to Idaho Power.**

The BLM may need to consider a supplemental DEIS to include this new information.

23 CFR 771.130 - Supplemental environmental impact statements

(a) A draft EIS, final EIS, or supplemental EIS may be supplemented at any time. An EIS shall be supplemented whenever the Administration determines that:

(1) Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; or

(2) New information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.

Comment #4: 3.4 Plan Amendments

The Southeastern Oregon RMP and Baker RMP Plan Amendments have been delayed due to sage-grouse related land use planning as directed by the State Director. The Sage-Grouse RMP Amendment process for the applicable western US Districts will issue Final EISs in the Spring of 2015

and Records of Decision in the summer of 2015. Once the Greater Sage-Grouse RMP amendment effort is completed, the BLM expects to resume work with estimated Draft issued in 2016.

Neither of the RMPs addressed the issue of immediate amendments that are recommended in the B2H DEIS. Of course, no reference was made to Landscape Planning as presented recently by the BLM in meeting in Denver and Sacramento.

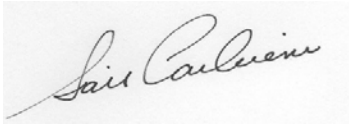
http://www.blm.gov/wo/st/en/prog/planning/planning_overview/planning_2_0.html

In order to authorize the Proposed Action, the Baker RMP would need to be amended at the Visual Resources section. "The portion of the 250-foot-wide right-of-way for the Boardman to Hemingway Transmission Project within VRM Class III lands in the vicinity of the National Historic Oregon Trail Interpretive Center would be amended to VRM Class IV."

Under Landscape Management, and any other consideration, 250 feet is a ridiculously small area for visual resource analysis.

The BLM must delay RMP amendments until both SEORMP and Baker RMP are completed.

Thank you;

A handwritten signature in cursive script, appearing to read "Gail Carbiener", is written on a light-colored rectangular background.

Gail Carbiener