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From: Karen Steenhof <karensteenhof@gmail.com>
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To: comment@boardmantohemingway.com
Subject: B2H Comments

Thank you for the opportunity to comment on the Boardman to Hemmingway Transmission Line Project. The portion of the proposed route within Idaho is reasonable in that it generally avoids both private land and Greater Sage-grouse (*Centrocercus urophasianus*) habitat.

The sections of the proposed route that cross creek canyons along the Owyhee Front warrant special concern because of the scenic values and the wildlife that the canyons and associated riparian areas support. It is important that the line be designed and routed in a way that will minimize conflicts with Golden Eagles (*Aquila chrysaetos*) and other raptors nesting in these canyons. The permitting process should disallow line construction in sensitive raptor areas during the nesting season so as to avoid direct disturbance to nesting raptors.

Golden Eagles on the Owyhee Front have been affected adversely by recreation associated with increased Off Highway Vehicle use (Steenhof, K., J.L. Brown, and M.N. Kochert. 2014. Temporal and Spatial Changes in Golden Eagle Reproduction in Relation to Increased Off Highway Vehicle Activity. Wildlife Society Bulletin 38:682-686). New access roads associated with the transmission line could increase the number of recreational OHVs in this area. Mitigation for the transmission line should include funding to close and rehabilitate certain access roads, decommission user-created routes, and support increased education and enforcement efforts. Golden Eagles that nest on relatively small cliffs on the Owyhee Front are particularly susceptible to disturbance caused by recreation activity associated with OHVs. Providing alternative nest sites higher on transmission towers could provide more secure nesting substrate and insulate eagles from disturbances. Artificial platforms on transmission towers similar to those designed by Morley Nelson on the Summer Lake 500-kV line will provide nesting sites at a safe location below the conductors (Steenhof, K., M.N. Kochert, and J.A. Roppe. 1993. Nesting by raptors and ravens on an electrical transmission line. Journal of Wildlife Management 57: 271-281.)

The proposed crossing at Hardtrigger Creek appears to be in the best possible location for the line (between the scenic canyon sections). However, it is near a historical Golden Eagle nest. The line should be a safe distance from all known historical nests. Discouraging recreation use in this area should be a priority and providing an artificial platform on one of the towers in this area could provide a more secure nesting location for this eagle pair.

In other areas outside of sage-grouse habitat, project proponents should use practices that enhance raptor populations along the Owyhee Front. Artificial nesting platforms can provide new and alternative nesting substrate for raptors, particularly ferruginous hawks (*Buteo regalis*) and golden eagles, in areas without cliffs or existing transmission lines.

Biologists and engineers should work together to design towers that are friendly to raptors but not to ravens. For example, the density of steel latticework on the bridge above the conductors should be as low as possible to discourage raven nesting. Tubular metal towers that lack suitable perching and nesting sites for raptors and ravens should be used in important sage-grouse habitat that cannot be avoided.

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