

comment@boardmantohemingway.com

From: Grange, Katey C (BPA) - KEC-4 <kcgrange@bpa.gov>
Sent: Thursday, March 19, 2015 3:40 PM
To: comment@boardmantohemingway.com
Subject: BPA Comments on Boardman to Hemingway DEIS
Attachments: B2H_DEIS_BPAComments_to_BLM_19March2015.xls

I have attached a comment matrix that contains BPA's consolidated comments on the Boardman to Hemingway DEIS. The spreadsheet contains two tabs- substantive comments and editorial comments – for consideration. Please don't hesitate to contact me with any questions or needed clarifications.

Thank you.

Katey Grange

Environmental Protection Specialist | KEC-4

BONNEVILLE POWER ADMINISTRATION

kcgrange@bpa.gov | 503.230.4047

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Boardman to Hemingway 500-kV Transmission Line						DATE:
Comments on December 2014 Draft EIS						
Section #	Page #	Line #	Table or Figure #	Reviewer Name/Agency/Program	Comment	A/R/M Remarks/How Resolved A = Accepted R = Rejected M = Modified
General				BPA	Overall, the B2H EIS presents a good overview discussion of the affected environment (with a few notable exceptions). That being said, the environmental consequences analysis was not as robust as the affected environment and the extensive presentation of data without accompanying analysis is difficult for the reader. It would be helpful for the reader to have summary tables that support a discussion of the key impacts in the EIS itself, with more of the details (and extensive tables) included in the appendices.	
General				BPA	At this time, there are many information gaps in the DEIS that are needed to fully analyze the project's environmental impacts. For example, the DEIS mentions ongoing ethnographic studies (3-197) and BLM's efforts to consult with tribes to "better identify the nature and location" of impacts. Also, on 3-803 (line 24), the EIS mentions that BLM needs to complete the "evaluation of indirect impacts to resources identified in the reconnaissance level survey." These information gaps and others (as described in the next comment regarding substations) make issuing a FEIS with the new information/analysis without allowing a public comment opportunity on the new information problematic for BPA.	
General				BPA	There is a general lack of information or conflicting information (where there is information) regarding substation alternatives. For example, the Abstract refers to a "connection to the Grassland Substation". The Summary (page 1-1) refers to the "Grassland Substation, that is currently under construction by Portland General Electric" and depicts a Grassland Substation on Figures S-1 and S-2 (and also later in Figure 2.1). The Summary then notes (page S-1 and S-2) that the northern terminus would connect to PGE's Grassland Substation, or one of two alternative substations near Boardman, Oregon." These two alternative substation sites are finally identified as Horn Butte and Longhorn (pages S-6 and S-7). The DEIS includes a limited description of the "new Horn Butte Substation" on 2-50 (line 5) and a similar description of "BPA's proposed Long Horn Substation" on 2-54 (line 16). Yet, on page 1-3 and again on page 2-1 (line 30) and page 2-3 (line 5), the DEIS announces that the line "would begin at the existing Grassland Substation." On page 2-18 (line 26), the DEIS refers to the northern terminus as the Grassland Substation "currently under construction" and notes that the Proposed Action would cause no additional ground disturbance and no new access roads. There is simply not enough information about the Boardman area substation and the information that is present is inconsistent and confusing. All substation site alternatives need to be analyzed in the EIS and the status of each substation needs to be correct and consistent. As a Cooperating Agency, BPA needs additional information in the EIS to support our decision. Including the substation alternative evaluation in a FEIS, without a public input process would be unacceptable to BPA. BPA would like to work closely with BLM to make sure the EIS can support a BPA decision.	
Summary	Multiple	Multiple		BPA	The summary often uses future tense ("will") instead of future conditional ("would") to describe the project and project effects. Please correct the text so that future conditional is consistently used throughout the summary (and the rest of the document).	
Summary	S-1	7		BPA	The text states "IPC proposes to construct, operate and maintain...". This project description language is not consistent throughout the EIS and related project documents (specifically the Cultural Programmatic Agreement). In the Programmatic Agreement, project decommissioning is considered as a part of the project, but decommissioning is not listed in the summary (or in other parts of the EIS). We suggest that the EIS consistently describe the project phases being considered in the EIS body and all appendices.	
Summary	S-17	2-3 and 6-7		BPA	The text states that construction impacts to wetlands would be short-term and therefore "moderate" and the operation impacts would be long-term and therefore "moderate". Additional information supporting the reasoning behind these same impact ratings would be helpful.	
Summary	S-22	36-39		BPA	Regarding the text "...introduction of electric fields in areas where power lines would be constructed could impact the ability of tribal members to use these areas for traditional cultural and religious practices..." - BPA can provide references that review the effects of electric fields in transmission rights-of-ways. We suggest clarifying the statement to say that the line itself, not the EMF, would impact tribal member's ability to use the area for traditional uses.	
Summary (and throughout document)	S-25 and multiple other locations	34		BPA	The text refers to the "environmentally preferred" alternative. We suggest the use of the term 'environmentally preferable' alternative throughout as this is the correct term under NEPA.	

1.1	1-3	16		BPA	Please add that BPA is part of DOE. Suggested change: Federal cooperating agencies for the B2H Project, in addition to the USFS Wallowa-Whitman National Forest, include the U.S. Navy, Naval Weapons Systems Training Facility, Boardman; U.S. 13 Environmental Protection Agency (EPA), Region 10; U.S. Fish and Wildlife Service (USFWS) Region 1; U.S. Army Corps of Engineers (USACE), Portland District; Reclamation; and <u>U.S Department of Energy</u> , Bonneville Power Administration (BPA).
1.9.1	1-28	5		BPA	Please clarify that EFSEC would site non-federal energy project developers. We suggest changing "energy project developer" to "non-federal energy project developer" in this sentence.
1.10 (throughout EIS)	1-36	Building Codes Division' row	Table 1-4	BPA	The text describes building permits required for construction of a substation at the Boardman Switching Yard. More information is needed throughout the EIS about this construction and the potential environmental impacts of the substation alternatives (please see the 'general' comment in row 6 above).
2.3.6	2-66	7-15		BPA	Please include BPA in the discussion of the No Action Alternative.
3.1.2.1	3-6	19		BPA	Please clarify how "low-intensity impact" is equal to "no identifiable impact." If there is no identifiable impact, wouldn't <i>ano</i> impact determination be warranted?
3.2.1.5	3-25	3-8	Table 3-3	BPA	We suggest including additional information addressing the instabilities in Idaho as well as Oregon. Although Oregon's DOGAMI database does not extend to Owyhee County, ID, is there any information from Idaho or other sources that would address landform instabilities in the project area?
3.2.3.5 and 3.2.4.5	3-116 and 3-211		3-35 and 3-54	BPA	Please revise the footnote definitions on these 2 tables to use consistent terminology. For example "N= Not known to occur" in one table, while "N= Does not occur" in the other.
3.2.4.2	3-197	12-16		BPA	If BLM is still engaging in ethnographic studies and consulting with the tribes to better understand the nature and location of wildlife impacts, is this impact sufficiently considered in the wildlife analysis?
3.2.4.6	3-273	1-40		BPA	The text seems to spend a disproportionate time discussing the negative edge effects without much detail on the beneficial edge effects for some species. We suggest inclusion of some additional description of the potential beneficial effects.
3.2.8.1	3-737	24		BPA	"issued" seems like the wrong word in this sentence. We suggest replacing "issued" with 'used'
3.2.8.1	3-738	2		BPA	We suggest that the sentence be corrected to state: ..."products" or "work" to human beings...
3.2.8.4	3-742	13		BPA	Please clarify that the 'site' referenced in the text is pulling/tensioning and boring sites, not cultural sites.
3.2.8.4	3-742 and 3-745	21 (3-742), 4 (3-745), and 14 (3-74500)		BPA	The methodology text states that the intensive level survey (ILS) and Class III surveys (i.e. Phase II) will be completed and presented in the FEIS. However, BLM has indicated in cultural consultation meetings that the Phase II reports would be complete after the FEIS. We suggest that the survey timelines discussed in the EIS be consistent with the schedule discussed during cultural consultation meetings.
3.2.8.4	3-742	14-15		BPA	It is unclear what the text "...adjusted to include the areas of land within this corridor from which the project would be visible." is describing. We suggest that the text be clarified to indicate if the APE for indirect effects is entirely within the 10-mile-wide corridor, or if the indirect effects APE may extend beyond the 10-mile-wide corridor in certain places.
3.2.8.6	3-786	19	Table 3-219	BPA	We suggest adding a footnote in the table describing what the 'unknown' resources include/mean in the context of the literature search conducted.
3.2.8.6	3-786	19	Table 3-219	BPA	The category of "ineligible sites" and "NRHP-listed sites/historic districts" are very broad and are not a resource type (as suggested by the heading and the other table entries). We suggest incorporating the ineligible sites and NRHP-listed sites/historic districts into the listed resources by types. Classifying some of the resources by eligibility status in this table seems duplicative to the information contained in the next table (Table 3-220).
3.2.8.7	3-803	24		BPA	It would be helpful if the date of anticipated evaluation completion were disclosed.
Appendix D	General			BPA	Upon review of this public version Draft Framework for Mitigation, it appears that no comments on previous drafts provided by BPA as a cooperating agency are included. On 2/26/2015, BLM confirmed to cooperating agencies an intent to integrate previously submitted cooperating agency comments as the document continues to be restructured between the DEIS and FEIS. It was also stated that previously submitted comments need not be resubmitted through this DEIS comment process to be considered. Thank you for continuing to refine the Framework with cooperating agency assistance as there are factually inaccurate statements which should be clarified and have been noted in comments you possess.
Appendix D	General			BPA	During this comment period, cooperating agencies heard from BLM their intention to rectify mitigation methodologies between federal and state environmental compliance processes. The FEIS should document the actions BLM takes to align state and federal mitigation processes with explanations why processes do or do not align.
Appendix D	1	2nd paragraph		BPA	"Accordingly, IPC has submitted applications to the Bureau of Land Management (BLM), U.S. Forest Service (USFS), Bonneville Power Administration (BPA) and the Bureau of Reclamation (hereafter decision making agencies) to obtain authorization to cross lands managed by those agencies." This is an inaccurate statement as IPC did not submit application to BPA to obtain access to cross lands managed by BPA. Please coordinate with BPA to correct this sentence so that it reads accurately in the FEIS.

Appendix E	General			BPA	We encourage BLM to revisit this document and include in the FEIS updated literature, methodologies, evolving state regulations/rule making, and lessons learned by other implementing projects. Also, coordinate with state biologists in Idaho and Oregon to align this project's actions with the state's sage grouse conservation planning efforts. Document in the FEIS the actions BLM takes to align state and federal processes for conserving sage grouse with explanations why processes do or do not align.
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Boardman to Hemingway 500-kV Transmission Line						DATE:	Remarks / How Resolved
Editorial Comments on December 2014 Draft EIS						A/R/M	
Section #	Page #	Line #	Table or Figure #	Reviewer Name/Agency/ Program	Comment		
Summary				BPA	The summary uses acronyms without first spelling out the name. We suggest consistently defining acronyms with first use.		
Summary	5-22	17		BPA	Suggest inserting 'project', "...used to analyze and compare <i>project</i> impacts across segments and alternatives..."		
3.1.1.2	3-3		3-1	BPA	As Umatilla is an important reference site mentioned throughout the text, it would be helpful to have the city of Umatilla depicted on Figure 3-1.		
3.2.1.5	3-33	3		BPA	We suggest correcting the text to reflect that squirrels are rodents.		
3.2.4.5	3-210	14		BPA	It appears that a word is missing between "fiscal year" and "detailed information."		
3.2.8.5	3-751	1-3		BPA	The text is confusing with the current punctuation. We suggest splitting the sentence and correcting the punctuation to say: "...refused to enter into this treaty. The band led by Chief Joseph, the elder, remained in the Wallowa Valley. By 1877, the Nez Perce had been pushed out of the Wallowa Valley. Displaced and beleaguered by internal and external conflict, the Wallowa..."		
3.2.8.5	3-778	30-31		BPA	It appears that a word was incorrectly inserted into the text "which gave rise to not the area's current name and the Virtue Mine.". We suggest eliminating 'not' in the sentence.		