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From: EnviroLytical - B2H <info@enviolytical.com>
Sent: Tuesday, March 17, 2015 5:07 PM
To: comment@boardmantoemingway.com
Subject: New Communication: Pursuant to 32 CFR 989.3, this office has conducted a review of the subject DEIS. The Air Force Civil Engineering Center (AFCEC) is pleased that the Bureau of Land Management, the project proponents,

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<https://el2.enviolytical.com/communication/view/103180>

Pursuant to 32 CFR 989.3, this office has conducted a review of the subject DEIS. The Air Force Civil Engineering Center (AFCEC) is pleased that the Bureau of Land Management, the project proponents, and agents have addressed potential impacts on military training which occurs within the region of influence. As indicated on page 3-390-391, the preferred and proposed alternatives intersect a number of military training routes which transit the area. Many of the subject routes are authorized for military use by the Federal Aviation Administration from 100 above ground level (AGL). Because of the low visibility provided by transmission lines, the proposed mitigation identified in Section 3.2.6.6 (page 3-424) is appropriate in order to address the safety hazard to both military as well potentially fire management and wildlife survey aviators transiting the region. The identified mitigation would require towers and/or conductors and/or shield wires be marked with high visibility devices (marker balls) where required by government agencies with jurisdiction (i.e. FAA).

The Federal Aviation Administration (FAA) (14 CFR Part 77) and the Oregon Department of Aviation (OAR 738-070-60) have jurisdictional authority over any construction or alteration that is more than 200 AGL at the site, requiring the submission of a notice to the FAA and Oregon Aviation. FAA may also request notification. Section 3.2.6.6 suggests that all project towers would be less than 200 AGL. FAA Advisory Circular AC 70-7460-2K clarifies that the filing requirement also applies to transmission lines with a catenary greater than 200 AGL above low water such as canyon crossings along the project corridor.

AFCEC suggest that the proposed mitigation measure be modified to require the proponent submit transmission line construction plans for corridor segments which intersect with military training routes to the FAA for an aeronautical evaluation and determination of appropriate marking requirements. Such a modified mitigation measure would assure that the FAA makes an appropriate determination, with Air Force participation in the standard FAA obstruction evaluation process.

This evaluation applies to primarily to MTRs assigned to Air Force units and not to affected routes assigned to the Department of Navy in the vicinity of NWS Boardman. Thank you for the opportunity to comment