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From: Scott Pugrud <Scott.Pugrud@oer.idaho.gov>
Sent: Thursday, March 19, 2015 9:45 AM
To: tgertsch@blm.gov; comment@boardmantohemingway.com
Cc: John Chatburn; Matt Wiggs; Sharon (sharon.kiefer@idfg.idaho.gov)
Subject: State of Idaho Comments
Attachments: Idaho B2H DEIS Comments.pdf

Please find the attached comments from the State of Idaho on the Boardman to Hemingway Transmission Line Project.

Thank you,

Scott N. Pugrud | Legal Counsel

Office of Energy Resources

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March 19, 2015

Tamara Gertsch, Project Manager
Boardman to Hemingway Transmission Line Project
Bureau of Land Management
P.O. Box 655
Vale, OR 97918

**RE: State of Idaho's coordinated comments on the Boardman to Hemingway
Transmission Line Project Draft Environmental Impact Statement and Land Use
Plan Amendments**

Dear Ms. Gertsch,

The State of Idaho submits the following comments which were developed through a coordinated effort between the Idaho Governor's Office of Energy Resources, the Idaho Department of Lands, the Idaho Department of Fish and Game (IDFG), the Idaho Department of Parks and Recreation, and the Idaho Governor's Office of Species Conservation. The State of Idaho appreciates the opportunity to comment on the Draft Environmental Impact Statement (EIS) and Land Use Plan Amendments for the Boardman to Hemingway Transmission Line Project (B2H Project).

Introduction

The Bureau of Land Management (BLM) prepared the Draft EIS in consultation with cooperating agencies and in accordance with the National Environmental Policy Act of 1969. The EIS is in response to an Application for Transportation and Utility Systems and Facilities on Federal Lands (SF 299) and a project Plan of Development (POD) submitted by the Idaho Power Company (IPC), the Applicant, to the BLM, the U.S. Forest Service (USFS), and the U.S. Bureau of Reclamation (Reclamation). IPC submitted its original SF 299 application and POD on December 19, 2007. The BLM determined that approval of the request would be a major federal action requiring the preparation of an EIS; the BLM published a Notice of Intent to prepare the EIS on September 12, 2008, in the Federal Register to formally initiate the EIS process. IPC subsequently submitted a revised SF 299 application and POD in June 2010, and the BLM published a revised Notice of Intent on July 27, 2010. IPC submitted additional revisions to its SF 299 application and POD in February and November 2011.

PacifiCorp, Bonneville Power Administration (BPA), and IPC jointly propose to design, construct, operate and maintain the B2H Project. IPC is leading the permitting process for the

B2H Project. The purpose of the EIS is to analyze and disclose the potential impacts of granting a right-of-way across Federal land to the IPC for the purpose of constructing, operating, and maintaining the proposed 500 kilovolt (kV), single-circuit, alternating-current electric transmission line, as well as a rebuild of portions of existing 138 kV and 69 kV transmission lines. The new transmission line would begin at a substation near Boardman, Oregon, and would extend south and east to the existing Hemingway Substation near Marsing, Idaho, a distance of approximately 305 miles. The proposed transmission line would cross federal, state, and private lands in five counties in Oregon and one county in Idaho. The proposed transmission line would cross approximately 93 miles of lands administered by federal agencies, including the BLM and the USFS. The Project would affect lands and assets administered by Reclamation and may potentially affect land and military Special Use Airspace administered by the U.S. Navy.

Purpose and Need

The objective for the B2H Project is to provide additional capacity to connect the Pacific Northwest region with the Intermountain region to alleviate existing transmission constraints between the two areas and to ensure sufficient capacity so that Idaho's electricity providers can meet present and forecasted load requirements. The B2H Project would facilitate the transmission of electricity on a regional scale, serve native loads, and enhance grid reliability. The B2H Project is neither required to support any particular new generation source nor justified by any particular existing generation source. Rather, the B2H Project would provide a high-capacity connection between two key points in the existing bulk electricity system that will enhance reliability.

The proposed transmission line is needed to avoid resource capacity deficits during peak usage, which occurs in the summer in Idaho and the winter in the Pacific Northwest. During peak usage, there is:

- No transmission capacity to transfer additional energy from the Pacific Northwest to Idaho and beyond;
- Limited transmission capacity to deliver resources from the Intermountain West into the Pacific Northwest; and
- No existing capacity to integrate new renewable resources proposed for development in eastern Oregon.

The B2H Project would add capacity to transmit electricity during peak usage loading conditions and to accommodate third-party transmission requests. The B2H Project will also improve Idaho's electricity suppliers' ability to provide reliable electrical service to their customers as mandated by federal and state agencies. Transmission systems in the United States are planned, operated, and maintained under North American Electric Reliability Council (NERC) standards. Additionally, Idaho's electrical utilities are also governed by the Western Electricity Coordinating Council (WECC). WECC policy, procedures, criteria, and standards are, in many instances, more stringent than those required by NERC. Transmission systems in the Western Interconnect must be planned, built, and continually operated with sufficient redundancy in order to comply with NERC and WECC standards.

Key Issues

The number of customers in IPC's service area is expected to increase from approximately 490,000 in 2009 to over 680,000 by 2029. Firm peak-hour load (the peak hourly electricity that the system must supply when demand is at its highest) has increased from 2,052-megawatts (MW) in 1990 to over 3,000 MW in 2006, 2007, 2008, and 2009. Average firm load (the average annual demand from customers) has increased from 1,200 MW in 1990 to 1,800 MW in 2008. The increase in demand and reliability is a critical issue for the State of Idaho that necessitates immediate and rapid attention.

IPC has received more than 4,000 MW of transmission service requests on the Idaho to Pacific Northwest path between 2005 and 2014. Of the service requests, only 133 MW were granted through 2007 due to the limited available transmission capacity of the system. There are currently active requests in study status that are expected to commence operations when the B2H Project is completed. The development of wind, solar and other renewable resources in response to state renewable portfolio standards is anticipated to further increase the demand for transmission capacity between the Intermountain region and the Pacific Northwest.

IPC's 2013 IRP shows the Boardman to Hemingway transmission line is the least-cost resource analyzed and provides the greatest level of peak-hour capacity. A new transmission line connecting IPC to the Pacific Northwest was first mentioned in the 2000 Integrated Resource Plan (IRP), and the upgrade was specifically identified in the 2006 IPC IRP. The State of Idaho believes that the Boardman to Hemingway transmission line is critical to serve customers and needs to be completed by 2018. However, given the numerous permitting delays that have already occurred, it is likely this project will not become operational until 2020 or beyond. It is imperative that the B2H Project be permitted and completed in a timely manner in order to serve Idaho (and Pacific Northwest) electricity customers.

Siting

The Proposed Action spans approximately 23.7 miles across Owyhee County, Idaho. The route crosses 19.2 miles of BLM-managed lands, 2.8 miles of state and municipal lands, and 1.7 miles of privately owned lands. The State of Idaho supports the BLM's identification of Segment 6 (Treasure Valley / Owyhee County) as the Environmentally and Agency Preferred Alternative. This siting has low impacts on resource (wildlife, cultural and historical, visual) land uses, avoids special designation areas, and does not cross any national historic trails.

The State of Idaho supports the Longhorn Variation, located west of Bombing Range Road, as the siting with the least impact to wildlife and cultural resources, land uses and prime farmland in Oregon, and utility customers. IPC and BPA are exploring the potential to remove the existing BPA transmission infrastructure that is currently located on the west side of Bombing Range Road. While this scenario may require a slight expansion of the existing BPA right of way west of Bombing Range Road, it also allows the B2H transmission infrastructure to utilize the existing disturbed footprint currently occupied by the BPA's 69 kV transmission line. Due to utilization of the existing disturbed footprint, there will be minimal impacts to Navy operations, wildlife and cultural resources, prime Oregon farmland, and ratepayers.

Comments Specific to Fish and Wildlife

In Section 3.2.4.4, page 3-207, Methodology, no Idaho-specific data source is listed for non-game wildlife, yet they are analyzed as part of the DEIS. The Idaho Fish and Wildlife Information System (IFWIS) is the data source within the IDFG that provides such data. Please list the IFWIS as a data source in this section.

Section 3.2.4.5, page 3-270, currently includes mule deer and bighorn sheep as big game species present in the analysis area for Segment 6. Please add pronghorn antelope to the list of big game species present in the analysis area for Segment 6. Also, please revise the source listed on page 3-270, line 11, from ODFW to IDFG.

In section 3.2.4.6, page 3-326, OM-16, please include the IDFG as the appropriate state agency to be notified if sensitive wildlife species are killed or injured within the segment of the project that is in Idaho. In Idaho, most of the BLM sensitive species that would be impacted by this project fall under state authority. Within the same section and page, in regards to PRC 1 and PRC 3, please note that the IDFG does not designate “crucial” winter range for big game, nor have “critical” bighorn sheep lambing areas been identified in Idaho. With that, the current language would suggest that there are no seasonal stipulations for construction on Idaho big game winter ranges or bighorn sheep lambing areas. Please make the appropriate revisions to clarify these stipulations to include designated winter range and bighorn sheep lambing areas in Idaho.

The State of Idaho appreciates the opportunity to submit these comments on the Draft EIS for the B2H Project. Please feel free to contact me with any questions or clarification related to these comments.

Sincerely,



John Chatburn, Administrator
Idaho Governor's Office of Energy Resources