



PLANNING DEPARTMENT

P. O. Box 40 • Irrigon, Oregon 97844
 (541) 922-4624 or (541) 676-9061 x 5503
 FAX: (541) 922-3472

March 18, 2015

Tamara Gertsch, BLM National Project Manager
 Boardman to Hemingway
 Transmission Line Project
 PO Box 655
 Vale, OR 97918

Dear Ms. Gertsch:

Morrow County established the Military Airspace Advisory Committee, or MAAC, almost three years ago and tasked them with identifying solutions to the local problems created by the Military Operations Area and Restricted Airspace attached to the Naval Weapons Systems Training Facility (NWSTF) Boardman that overlays northern Morrow County. Initially the Navy and Morrow County felt that appropriate land use strategies may be possible, but discussion with the parties has put that into question and it is not an alternative that is currently supported by all the involved parties. As you may be aware the impetus for this group and its work is the impediment to wind energy development caused by the Military Operations Area.

This group has also been working cooperatively discussing the proposed Boardman to Hemingway (B2H) transmission line and, because of the diverse background of the participants, wanted to find common ground on which to submit comment during this draft Environmental Impact Statement (EIS) comment period. The following were items that the group could come to agreement on:

- A southerly route is preferred. The current Horn Butte Alternative and its respective analysis is mostly adequate and would need to have additional analysis completed to a preferred terminus of the Slatt Substation.
- The Cumulative Impacts analysis does not adequately address two concerns - the multiple transmission lines that are proposed for the Bombing Range Road corridor or address the socioeconomic impacts of the B2H line on irrigated agricultural operations in north Morrow County. The Morrow County Chapter by Chapter review has more information on reasonably foreseeable future actions not currently identified that could further impact the Bombing Range Road corridor.
- The Longhorn Variant does not adequately distinguish the east side of the road from the west. The landowners are different and the activities are dissimilar. And the economics of the two actions cannot be compared, nor are they delineated. This dEIS is missing a crucial economic analysis of the agricultural operations under and adjacent to the proposed line.
- The dEIS does not address the potential for connected actions should the final route be some version of the Longhorn Variant. In order to accommodate wind energy generation and its associated transmission a number of actions may need to be taken to achieve a siting approval that would be consistent with the final EIS and any approval

granted through the Energy Facility Siting Council. The final EIS should address these potential connected actions, including but not limited to relocation of current lines and development of transmission related to pending projects, associated with this routing variant.

The MAAC appreciates the work of the Bureau of Land Management and thanks you for this opportunity to provide comment. The group is committed to seeing this project be built, albeit built in a way that is supportive of the agricultural community and the opportunities that we have in development of renewable wind energy projects and the associated transmission lines for those projects.

Should you have any questions about this letter or the MAAC, please contact Morrow County Planning Director and staff to the MAAC, Carla McLane, at 541-922-4624 or by email at cmclane@co.morrow.or.us.

Cordially,



Leann Rea
Morrow County Commissioner

Don Rice
Greenwood Resources



Jerry Breazeale
Morrow County Planning Commissioner

Larry Lindsay
Lindsay Ranches

Steve Meyers
Umatilla Electric Cooperative