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From: Katie Fite <katiemesa@gmail.com>
Sent: Thursday, March 19, 2015 12:03 PM
To: comment@boardmantohemingway.com
Subject: Boardman to Hemingway Transmission Line Comments

March 17, 2015

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B2H Project

P.O. Box 655

Vale, OR 97918

RE: Boardman to Hemingway High Voltage Transmission Line DEIS

Dear BLM and Forest Service,

Here are WildLands Defense comments on the Boardman to Hemingway (B2H) high voltage transmission line project. The DEIS analysis involves siting, construction and operation, and must address a full range of adverse direct, indirect and cumulative environmental effects if this undertaking.

There are dozens of loose ends, unfinished surveys, unfinished plans, incomplete mitigation measures. There remains major uncertainty surrounding nearly all aspects of this project. Thus, a Supplemental DEIS should be prepared for public review and comment before preparation of a FEIS.

The DEIS barely scratches the surface in revealing the array of harmful impacts this project and several very harmful segments will have to the native vegetation, rare terrestrial and aquatic species, watersheds, viewsheds and important historical and cultural values and recreational and other human uses across this landscape.

Mammoth Project Supports Dirty Fuel Burning and Climate Change Gas Emissions

The Project is supposed to bring power from the burning polluting coal in Wyoming westward. Thus, it entrenches a very harmful IPC carbon footprint. The project has significant global warming and climate change impacts that must be fully assessed.

All of the emissions associated with the generation of the enregy it will be used to transport, the project materials production and transportation, fuel involved in construction and operation, loss of vegetation and microbiotic crusts and their ability to absorb carbon dioxide and other climate change gases and loss of the lands' ability to buffer the adverse effects of climate change naturally, and any other emissions and/or losses of climate change gas absorption potential associated with the line must be accounted for and assessed.

This includes the loss of the ability of forested systems, for example, to sequester carbon where vegetation is cleared and maintained. BLM must consider the loss of natural carbon storage potential from the large-scale construction of roads, assembly sites/yards, etc. – along with the further spread of annual flammable invasive cheat and medusahead, that reduce the ability of the native vegetation systems to absorb and store CO2. Grazing also reduces soil carbon storage.

The Proposed action includes a 305 mile 500 kv transmission line, extensive road grading, clearing and road network expansion. It involves 114 miles of new roads and 165 miles of "improved' roads (DEIS Table 2.6), plus all manner of additional construction phase disturbance blading, blasting and other activity.

The route often diverges from existing corridors, disrupts wildlife habitats and aquatic species watersheds, and substantially mars scenic viewsheds and historic trails and cultural sites and WSAs and other wild lands.

This line will provide a lethal flight hazard all along its 305 mile length for migratory songbirds and other avian species, rare bats, and native insects. Each and every line length between each and every upright tower must be marked with avian flight diverters. There is no estimate of how many thousands – or more – birds this line may kill during migration periods, or throughout each year. Any facility lighting must be shrouded to minimize effects on night migrants. There appear to be no studies of bird migration patterns and predicted mortality and other harms that have been done for this mammoth project.

The line and welter of ancillary facilities provide all manner of elevated avian predator perches and potential nesting sites for sage-grouse nest predators and predators of other avian species as well as predators of rare small mammals like the pygmy rabbit.

The visual footprint of this line will be immense – visible over several miles – with gleaming metallic structures especially visible as the sun is getting lower in the evening, or upright towers sticking out like sore thumbs on formerly scenic ridgelines. Fite field obs. High voltage line near Salmon Falls Res – visible from China Mountain higher plateau areas, including reflections.

The visual impact must be measured from a very broad range of Key Points including sensitive wildlife habitats, and during all light conditions.

Similarly, construction period noise studies (including potential motor vehicle routes and and helicopter access paths) must be conducted under a broad range of real world situations – including those of other lines in similar seasonal, moisture and other regimes.

This line will also very significantly elevate the risk of human-caused fire, and raptor or other electrocutions causing fires as well. Thus, keeping the line right by the Interstate and/or by developed areas where access to control fire is easier is essential.

Oregon and Idaho sage-grouse and other wildlife have recently experienced a large number of large fires, exacerbated by very hot, dry, windy weather conditions likely related to climate change. There have been numerous raptor electrocution fires in Idaho and elsewhere over the years. There have been a large series of fires in eastern Oregon recently. Long Draw and Holloway to the south, the immense Mustang and other fires this summer – over 400,000 acres including crucial sage-grouse habitats. These fires occur amid a sagebrush landscape – especially in the Baker and Vale lands – that have been torn up by livestock forage seedings and exotic plantings during the heyday of the Vale Project, and continuing up to the present – using post- fire "rehab" as an excuse. The sagebrush sea of Oregon, and adjacent Idaho has become largely a mottled crested wheatgrass and weed wasteland in many places due to fires and human post-fire mis-management.

Climate change will result in hotter temperatures that will also promote cheatgrass, medusahead and other flammable weeds. Ubiquitous livestock grazing impacts across public land and other segments of the route promotes these weeds, too. See Belsky and Gelbard 2000, Reisner Dissertation 2010, Reisner et al. 2013. Spring grazing and trampling dries out sites earlier. All of this combined – climate change, hotter temps and less precip failing as snow and earlier snowmelt, increased flammable annual grasses, increased drought and/or extreme weather events – and the chronic extensive disturbance – will exacerbate fire risk.

We stress that all sites must be revegetated with local native ecotypes. Forage kochia is a weed that escapes and invades native vegetation communities to their detriment. Using crested wheatgrass should not be allowed. In fact, mitigation for this project should include large-scale removal of cwg seedings in and near sage-grouse and other rare species habitats. CWG also is now known to spread and invade other areas– see INEL site long-term veg monitoring reports. Moreover, fire after fire after fire has burned right through the cwg seedings in Vale BLM lands, in the Jarbidge, areas all around the Snake River Plain – Shoshone, Idaho Falls BLM, Pocatello BLM, etc. Despite BLM Range staff claims to the contrary, cwg is a fire hazard.

The line will emit electromagnetic radiation, which is harmful to humans and may also have significant effects on wildlife, domestic animals and other biota. Animals may sense the radiation and avoid it, and/or avoid the crackling/sizzling noise that is audible even to a human ear.

IPC has long known about public and biologist's concerns about electromagnetic radiation. See Gateway Transmission Line EIS documents, for example:

http://www.wy.blm.gov/nepa/cfodocs/gateway_west/sgrouse/DEIS-ReferenceMaterial.pdf

Gateway 3-11-63 states:

Greater Sage-Grouse (*Candidate; MIS; Forest Service Sensitive; BLM Sensitive*)

The USFWS's 12-Month Findings for Petitions to List the Greater Sage-Grouse as Threatened or Endangered (2010e) listed the following as potential impacts to the greater sage-grouse resulting from powerlines: 1) collisions/electrocutions, 2) consolidation of predatory birds along powerlines, 3) lower recruitment rates near lines, 4) habitat fragmentation, 5) degradation of habitat due to spread of invasive plant species, 6) impacts resulting from the line's electromagnetic fields, and 7) direct loss of habitat. Additional impacts related to construction and operations of the line, as well as associated infrastructure, could include short-term disturbances due to construction and long-term disturbances during operations, increased road access allowing poaching in previously inaccessible locations, and changes to habitat structure resulting from altered fire regimes. Note that many of the general impacts that could occur to this species are addressed in the black-footed ferret section as "impacts that would occur to all species addressed" (e.g., the effects of fire, poaching, and invasive weeds).

Reasonable Alternatives Arbitrarily Shunted Aside - Failure to Consider Reasonable Range of Alternatives

Throughout this protracted process, BLM has failed to require that Idaho Power Company consider reasonable and valid alternatives that would significantly lessen the adverse disturbance and ecological impacts of this mammoth transmission line project.

Yet at the same time, BLM has now allowed the DEIS to include a series of even more harmful alternative route segments that would have an even more damaging footprint on public lands, watersheds, wildlife, recreational uses and enjoyment, and proliferation of irreversible exotic weedy species including flammable annual grasses.

IPC has refused to take a detailed and hard look at two very reasonable siting alternatives, and combinations of alternatives, that would greatly minimize the disturbance and degradation footprint of this line. BLM must push back harder against the political power of IPC and require that a series of reasonable alternatives that IPC brushed aside be considered.

These alternatives are:

- Co-locating this line with existing lines to the maximum extent possible combined with upgrading existing line segments to a Double Circuit new transmission.

- Locating this line along the I-84 corridor to the maximum extent possible.

- A combination of co-location and paralleling the I-84 corridor, and potentially some burying of portions of line segments.

These alternatives and variations on them – including combinations must be thoroughly analyzed in a Supplemental DEIS.

The DEIS makes vague, uncertain and unsupported references to “technical considerations” and other vague statements to avoid and deflect any analysis of these and other additional alternatives.

IPC also refers to costs as a reason for rejecting alternatives. Well, this project has long been delayed because the public overwhelmingly does not like the line and the routes, and does not believe the line is needed. Plus many folks do not want their rates to go up to pay for it. Certainly - if this project is really needed – then IPC must listen to concerns, and devise other alternatives than those of the EIS, rather than being bogged down for a protracted period wrangling over one bad route or the next.

IPC needs to re-assess if there really is any need for the line at all. Aren’t there some relatively modest changes it can make in accepting more solar energy and conservation practices so as to eliminate the need for the

project? The need for this line is simply not pressing – especially given the ever-evolving solar energy situation that could readily supplant dirty coal burning plants in Wyoming that this Boardman-Hemingway boondoggle of a line is tied to.

Just today, an article in the *Idaho Statesman* once again shows Idaho Power resisting solar development and components of viable alternative energy portfolios:

See http://www.idahostatesman.com/2015/03/18/3701077_developers-bet-on-solars-future.html?rh=1 . This states:

"Idaho Power has not made it easy for developers".

Idaho Power can simply stop fighting (in public and/or behind the scenes) renewable solar energy, and actively support and help solar sited in disturbed areas, rooftops, parking lots, etc. and save all the cost and antagonism the B2H line is generating. This too is an alternative that must be considered. What if even half the cost of this line was used to subsidize solar rooftop/parking lot/disturbed areas close to grids? Would there in reality be any need for B2H?

Several of the segments simply cannot be mitigated – Timber Canyon for example, impacts far too much USFS land and rugged terrain. Several other Alternative segments impact far too sage-grouse PPH, PGH, habitat important for restoration – and overall Occupied Habitat, and/or wintering habitat for big game and other important values. These segments should not have been considered as viable – due to too many unable to be mitigated impacts to sage-grouse and other native biota and public lands values. They should not have been considered "reasonable" alternatives.

See DEIS Section 2.5.2 and Table 2-12 Summary of Effects Table describes a host of very significant impacts that should have forced the BLM to scrap the Preferred Alternative and several alternative route segments as well. Plus the DEIS analysis barely scratches the surface in laying out all the ecological problems to sage-grouse, Colu,bia spotted frog, rare fish, rare plants, and other rare species that B2H would cause. Sage-grouse population, big game winter habitats, etc. are simply already in trouble across this landscape, and in very short supply. They are already so limited by human development that any additional intrusions into these areas must be considered unable to be mitigated by any means other than complete siting avoidance.

Table 2-12 Effects summary - which at times is confusing -shows very significant adverse impacts, even though BLM often under-estimates the magnitude of the impact, and/or fails to address how severe the effects will be other than in terms of low, moderate, high. What about a "severe" category? What about "will cause the local population to collapse"? Or "irreversible long-term impact"?

There are serious adverse impacts to scenic quality, including High Quality areas and visual resources, and to National Historic Trails (a whopping 166 of 212 miles). These effects will be long-lasting and severe. Some like eroding road cuts, will be irreversible, as will ugly weed infestations. 79% of the Oregon Trail setting/viewshed will be marred, and 75% of the Goodale's Cutoff. There are cumulative adverse impacts to these trails- both across the B2H project areas as well as with Gateway segments. See Gateway EIS site:

It is also impossible to understand where all existing transmission lines are in relation to the route segments, road densities, etc.

The EIS Table summarizing impacts drastically under-estimates the long-term impacts to vegetation – as the combined transmission line footprint disturbance effects plus grazing will cause serious irreversible alien species expansion and dominance- threatening native vegetation, rare plants, and the native animals and public uses and enjoyment that depend on them.

The same greatly over-optimistic claims are made for rare fish. This cannot be the basis for acceptable ESA consultation and must be greatly revised. There will not be long-term "low" impacts – as road cuts will bleed sediment, upgraded roads will see increased traffic and sediment runoff, herbicide use associated with the line and facilities will be long-lasting. Weed invasions from the line will be spread crosscountry by grazing livestock, leading to much longer term significant herbicide and degradation impacts that will affect ESA-listed and other sensitive species habitats and expose native biota and human users of public lands and residents (including who may have immune systems that do not cope well with herbicides) to increased herbicide impacts.

The Route tears across eight ACECs, with significant long-lasting effects on their Relevant and Important Values, including irreversible effects like weed invasions, erosion, etc. It impacts the wild lands values of 3 WSAs and a Lands with Wilderness Characteristics - marring solitude, primitive and unconfined recreation, natural and biological values, scenic beauty, sense of isolation, etc.

In the Morrow-Umatilla length, both Horn Butte and Longhorn have significant unacceptable levels of impact. In the Blue Mountain length, both Glass Hill and Timber Canyon have long-term High adverse effects on GRSG (and should not have been considered reasonable alternatives). In the Baker Valley length, Timber Canyon, Flagstaff and Burnt Mountain have long-term High adverse effects on GRSG.

In the Brogan length, Willow Creek and Tub Mountain have High long-term adverse effects on GRSG and never should have been considered viable alternatives. In the Malheur length, Double Mountain and the Malheur paths have High GRSG impacts, and so does the Treasure Valley length.

In every part of the project, reasonable alternatives are ignored. For example, there are no alternatives provided for construction under the Proposed Action – such as increasing use of helicopters to minimize the need for the plethora of new and expanded roading in many areas.

Loose Ends and Large-Scale Uncertainty Abound

DEIS Chapter 2 references a whole series of "framework plans", yet much of the necessary specificity of actions for a valid hard look NEPA analysis and to determine compliance with Land Use Plans, the Clean Water Act, the NHPA, the MBTA and other environmental protections is still up in the air. The EIS punts to some future point – and describing that plans "would be developed". The existing information is mostly the minimal and uncertain info in the EIS Appendices. The stack of Appendices and aspirational lists of actions full of loose, uncertain and non-binding language where protection promises can be waived - are already several years old, and often are based on outdated scientific information and/or omit key environmental attributes. They often will have limited environmental benefit compared to the damage the construction and operation of the line and linked facilities will have. The hodgepodge of plans does not really chart an integrated and protective path forward. Conflicts between actions – say to protect watersheds from runoff, and rare species habitats, are not weighed and dealt with.

DEIS at 3-7 to 3-8 references a habitat mitigation plan for sage-grouse and other biota is in preparation, but states that it has not been finalized. Thus, there can be no certainty of effective mitigation, and no full and open public comment prior to finalization. There is no way to understand the effectiveness and appropriateness of mitigation plan components, and the overall plan outcomes in the short, mid and long terms. There can also be no comprehensive integrated assessment of all direct, indirect and cumulative effects. A SEIS must be prepared with the Plan for public comment.

The DEIS references the GRSG Blueprint, which is DEIS Appendix E. We are providing comments on the Blueprint below. We do not believe it sufficiently establishes a solid scientific baseline for understanding the plight of these already very highly fragmented and weed vulnerable sagebrush communities, the full array of current sage-grouse science, the full battery of cumulative threats the populations face already, and other vital information to ensure the continued sustainability of habitats and viability of populations.

There are no clear criteria for mitigation by avoidance. For example, what level of anticipated population decline would trigger avoidance/rejection of a route or line segment? The Blueprint also does not provide effective actions to minimize project impacts, "rectify" impacts (whatever that means), and/or adequately reduce impacts.

Of course, IPC will try to point to a strategy of compensatory mitigation. But when one is dealing with a landscape bird with specific seasonal habitat needs, and the bird also requires the ability to move between crucial seasonal habitats over the landscape, and the bird's population is already greatly reduced due to

deleterious public lands and other livestock grazing, a large and harmful battery of livestock facilities and infrastructure, exotic crested wheat seedings, human development and agriculture on private lands in the heart of valleys, a high density of roads in many areas, serious flammable exotic grass infestations, existing powerlines, and overall habitat fragmentation – it becomes extremely difficult and frankly impossible to conjure up images of complete new landscapes where the species can survive. Or to believe that the ever-shrinking habitats for the other Oregon populations can be boosted enough to make the B2H losses be really mitigated.

What does "ecological durability" mean in terms of habitat quality and quantity and numbers of leks and birds for the affected GRSG populations? For the affected pygmy rabbit populations?

In reality, even other alternative segments that BLM claims are better still have serious adverse effects – such as the Tub Mtn. route that impacts far too much public land, and where BLM should be restoring habitat for sage-grouse and other wildlife rather than sacrificing it. After fires, BLM has promised the public it would restore habitats. Now, it abandons such promises in sacrificing habitats that should be restoration habitats.

There is greatly inadequate baseline information on the status (extent/acreage, ecological condition, serious weed problems, livestock grazing disturbance and facility burden, degree and severity of existing fragmentation, overall adverse human development footprint, cumulative threats, etc.) in the impacted local habitats and populations for a proper Mitigation plan or other plans - for a requisite EIS hard look analysis to be undertaken. This is due in part to inadequate thorough upfront baseline inventories, surveys, data review, data analysis (such as trends over time, fragmentation/connectivity analyses, viability analyses, etc). It is also due in part to the reluctance of agencies to want to reveal that populations are so low and/or habitats are so degraded – because this would reveal an urgent need for ESA listing. Yet all of this information is necessary to allow understanding of what level of mitigation is necessary, and the cumulative and additive harm the alternative segments would cause.

Full Project Footprint Must Be Assessed and Mitigated

The 305 mile line includes a 250 foot permanent right of way – which is a very wide swath of land, along with114 miles of new roads, 165 miles of drastically "improved" roads, large bared areas for assembly, helicopter landings concrete batch plants, etc. The direct, indirect and cumulative disturbance footprint would be immense. Visual scars from the largely de-vegetated right of way, gashes from roads cut blasted into steep hillsides, gleaming metal reflecting in the sunset – all will be a major visual intrusion and mar scenery. The adverse impacts to wildlife will reverberate across thousands of miles – as migratory birds that winter in Central America and provide an ecosystem service there by consuming insect pests on crops will be killed by collisions with the immense wire and tower footprint of the line and facilities.

Plus, this project is likely to open up undeveloped lands in proximity to it to all manner of development – with further impacts to the ecosystem – ranging from increased demands on already greatly over-allocated water

supply systems and aquifers to new additional direct loss of habitats for wildlife an even more habitat fragmentation.

The EIS references an “aggressive construction schedule”. This appears to us to mean that the minimal avoidance criteria for wildlife and other environmental constraints are likely to be waived and thrown by the wayside after the ROD is signed and pressure from the IPC’s political allies starts to come down on federal agencies. Review of the language in Appendix E and other largely nebulous plans shows the promises are not mandatory, binding and certain. We are very concerned that the “aggressive schedule” would result in construction and other activity when soils are too muddy, activity on top of nesting migratory birds and wintering wildlife, and many conflicts with sage-grouse and raptors as well. This is also likely to increase pressure on agencies to waive compliance with conservation and mitigation measure promises of the EIS and its stacks of Appendices and Plans (many of which are not even finalized preventing proper analysis of their adverse impacts and certainty of mitigation measures). Given how long this has been proposed, there is no need to hurry up now and harm important resources. Waivers must not be allowed – yet the language is full of loopholes and “outs”.

Will all activities on private and state lands (non-federal lands) be held to the same standards? Please also explain in much more detail how activities will be conducted on private and state lands, and if the same degree of avoidance and other mitigation will be required and mandatory there. If not, how will activity during construction and operation differ, and what will the adverse direct, indirect and cumulative environmental effects be?

Stream crossings, culverts, erosion in degraded drainage networks, etc. is a significant concern. The water quality in many of the springs, seeps, intermittent and perennial drainages is terrible and water quantity is also decreasing – especially sustainable perennial flows– due to impacts such as desertification and erosion from grazing-damaged public lands and lack of shading riparian vegetation on these lands. The BLM and Forest permits for grazing must undergo a hard and thorough look, to account for the level of grazing degradation and inadequate controls on herbivory and trampling by half ton cattle and/or herds of sheep, and similar inadequate controls on woody vegetation browse and breakage. Water quality is also highly compromised by ag field ad feedlot runoff, existing road network runoff (what exactly is the road footprint affecting watersheds, rare aquatic species habitats, sage-grouse habitats, big game habitats, etc.?), and a combination of all of these factors.

Grazing Disturbance Footprint represents Cumulative Threat

A full accounting of the harmful impacts of grazing systems, grazing levels, stocking rates, actual use, etc. must be provided. So must monitoring data and a discussion of where, when and how monitoring is conducted. Full and detailed analysis of the very large and harmful livestock facility and linked roading footprint must also be provided. How is grazing as being conducted harmful to sage-grouse? To Columbia sported frog? To bull trout?

Where and when have FRH processes been conducted and what have the results been? How is this affecting local populations – for example, we remind Vale BLM of the Bully Creek LAMP, and BLM's whole series of broken promises there amid a tragically weed-infested landscapes – includng a profusion of white top and annual grasses.

Misc Chapter 3 Concerns

The EIS states that project effects can be categorized as either direct or indirect. They can also be cumulative.

The DEIS also states:

◦ *Significance is defined by the Council on Environmental Quality regulations as a measure of the intensity and context of the effects of an action on, or the importance of that action to, the human environment (40 CFR 1508.27). Significance is a function of the beneficial and adverse effects of an action on the environment. The intensity of the environmental effect can also vary. Qualitative and quantitative variables of resource sensitivity, resource quality, and estimated ground disturbance were considered in estimating the intensity of effects.*

Full baseline studies on current conditions on the ground across the footprint of the landscape impacted by all segments has not been provided. This includes the actual vegetation on the ground - for example: Current presence of native vs. exotic vegetation and plant community composition that forms an underlying basis for GRSG and other wildlife habitat. What is the location and areal extent of relatively intact native veg communities – and their context in the landscape – i.e. will the project punch a new weed and disturbance corridor through the heart of a one of the only less weedy sites in a segment? Have areas been identified as important for restoration to re-connect and expand fragmented habitats? We remind BLM that the populations of GRSG and many other wildlife – as in the Baker and other areas cut through by the line are already very low, and in essence – threatened. See Knick and Connelly 2009/2011 Studies in Avian Biology Garton and other Chapters. What is the magnitude of existing threats to this population, and how will the project cumulatively add to these threats and lessen population viability? WHERE can a "replacement" population magically be created??? Of course, creating sufficient new habitat is extremely unlikely - so mitigation by AVOIDANCE of siting the line in the wrong place must be required and applied.

Full baseline studies of how species use the landscape are crucial prior to selection of alternatives.

DEIS at 3-6 also claims:

◦ Context means that the effect of an action must be analyzed within a framework or within physical or conceptual limits. Resource disciplines; location, type, or size of area affected (e.g., local, regional, national); and affected interests are all elements of context that ultimately determine significance. Both short- and long-term impacts are relevant.

So what exactly IS the context of siting the lines in areas where sage-grouse still manage to persist, but the population and habitat is in a perilous state? See Knick and Connelly 2009/2011, Garton and other Chapters, see

also USFW COT report 2013 population summary information. The context is a situation exists where punching this line through several of the route segments that never should have been considered as viable alternatives is likely to lead to the extirpation and extinction of the local population and a range contraction – from the direct, indirect and cumulative effects of the powerline – from fragmenting habitat to increasing predation to direct mortality, to promoting even more development and human disturbance across a broad area of the landscape.

All of this complex mitigation jargon and efforts to word-smith problems away is occurring because IPC refuses to back off its desire to export dirty coal energy from Wyoming, all the while fighting solar rooftop and small scale solar in Idaho and elsewhere.

According to various reports on NRCS and other spending – federal agencies have already thrown tens of millions of dollars at landowners in the Baker region and other areas near the line -ostensibly in the name of saving sage-grouse (though many of the projects closely resemble livestock forage projects of years past). Was this all spent in vain – as the power line will be the final nail in the coffin -over the next couple of decades – of the Baker and other populations? How will the line affect the lack of certainty that the various landowner CCAAs and other myriad other schemes to avoid listing will be effective? If the line goes in, won't any rancher agreements FWS may endorse have to be much more protective of habitats –because the habitat will have become even more compromised by the impacts of the powerline?

The crux of the matter is – there are no longer any "disposable" sagebrush and sage-grouse and pygmy rabbit habitats. Populations are already stressed to the point where very significant AND EFFECTIVE restoration of the EXISTING highly disturbed and fragmented habitats is required. New development of this magnitude cannot occur in Occupied habitats.

We also note that despite hundreds of millions of dollars being spent whacking junipers and building even more fences for flawed intensive "rotational" systems to subsidize ranchers in the name of sage-grouse, a commitment to removing exotic species in the understory and stemming the tide of invasive exotic species through REDUCING grazing and other disturbance – is lacking. See Manier et al. 2013 BER report on GRSG discussion of various grazing system failures, for example.

Geological Hazards

With Gateway's eastern segment, all of the hazards had not been identified and re-routing was necessary after the ROD was signed (or so an appellant claimed when IPC at the very end of the process sited the route right by their property due to a previously unknown constraint). Much more comprehensive upfront information must be provided on the full extent of geological and all other environmental constraints.

There is a serious threat that fracking for potential Oil and Gas (as there is now an Oil and Gas boom near Payette and formations may extend into OR), as well as fracking for geothermal development – may result in de-stabilization of underground layers and produce seismic activity and geological instability. This line also runs through areas where aquifers may increasingly be depleted, including due to irrigation withdrawals.

BLM's various BMPs for Oil and Gas and other activity the DEIS vaguely refers to are greatly inadequate.

Soils/Reclamation – Native Vegetation and Local Ecotypes Must Be Mandatory

Only local native ecotype plants should be used in all rehab, stabilization, and/or revegetation efforts throughout all phases of this project. All livestock use on public lands must be pulled back to existing pasture fences and adequate rest provided so that rehab efforts can be successful. BLM must require this. BLM cannot continue with the same that failed crested wheat and forage kochia weedlands course of its seriously flawed and failed fire "rehabs" to occur here. See USGS Arkle et al. 2014 describing the failure of rehabs for sage-grouse.

Evidence is mounting by the day on how bad for wildlife cwg and other exotics are. Examples: INEL work with long term veg plots showing crested wheat invading areas it was not seeded. New studies on ecological harms from cwg – Rottler et al. 2015, plus please review many of the areas with very frequent fires are often cwg seedings. Native plants can provide the very same benefits and "stabilization" as exotics – but sites MUST be protected from the bovine/ovine damage. Pulling livestock back to existing pastures and/or buying out the adjacent allotments and having this EIS amend the RMPs/Forest Plan to do so is a mitigation measure that must be fully assessed. It would also have tremendous value for watersheds, water quality and quantity, sage-grouse, and other wildlife.

The BMPs and appendix measures do not comply with even the RMP provisions cited, nor those of the Forest Plan. Further, recovery of microbiotic crusts must be assured. Crusts are a front-=line defense against invasive species.

The soils, crusts, native vegetation, wildlife communities, ad any rehab, recovery, restoration and mitigation actions are threatened by the impacts of livestock trampling in compacting and displacing soils, and in damage, depletion and destruction of microbiotic crusts, making sites much more vulnerable to annual invasive grasses and wed invasions. These effects are amplified by climate change. Beschta et al. 2012, 2014.

Paleontological Values

The significance of the paleontological values and sites has not been adequately surveyed and assessed.

Appendix E Concerns

The Environmental Protection measures (BMPs SOPs, "mitigation" measures, etc.) in Appendix E (dated years ago in 2011) are greatly inadequate to protect: the soils, microbiotic crusts, native vegetation communities (which are highly vulnerable to flammable exotic invasive species spread across much of this region), viewsheds, historical and cultural sites and their integrity, viewsheds, recreational uses and enjoyment, and the health and viability of wildlife habitats and populations, watershed processes, sustainable water flows and water quality and quantity and aquatic species habitats, and a host of other very important values of these lands. They are inadequate to mitigate the cumulative adverse effects of climate change, too.

We are very concerned about the adverse effects on sage-grouse, pygmy rabbit, migratory songbirds, and the health of biota and humans affected by the line, electromagnetic fields, all manner of herbicide use, erosion of soils in wind and water likely contaminated with herbicides – with grazing in watersheds amplifying the adverse effects powerline disturbance in erosion and herbicide drift, and myriad other factors.

And of course, any promised rehab, revegetation and site stabilization is made even more uncertain by the serious adverse disturbance impacts of domestic livestock grazing and trampling disturbance inflicted annually across these watersheds. These effects are amplified by climate change.

All of these factors combined support the need to maximize avoidance of sage-grouse, pygmy rabbit, sage sparrow, Brewer's sparrow, sage thrasher, loggerhead shrike and other imperiled sagebrush species. BLM has

considered a series of harmful alternatives that are not sufficiently protective of public lands, native biota, and fragile watersheds and wild land ecosystems.

The stormwater pollution prevention measures will not be adequate in landscapes that are chronically grazed and disturbed. Powerline-disturbed areas will be constantly re-disturbed, trampled, likely to be overrun with shallow-rooted invasive species that are very poor watershed stabilizers in any higher energy precipitation events, etc. Cheatgrass and medusahead are very poor soil stabilizers under severe thunderstorm and other runoff events, especially where any slopes are involved. White top will proliferate, and will require very heavy levels of herbicide.

Sediment, spills, contamination/environmental pollutants are all likely to runoff in storm events, as well as harmful substances contaminating soil erode in dust ad be deposited elsewhere. This will be aggravated by chronic gross overstocking and harmful livestock use levels and periods across the public lands portion of this line. And on private lands, there are at times even worse conditions in some areas. There will be significant adverse effects from private lands activities, as well – and the full spectrum of cumulative adverse impacts must be fully considered in a SEIS. An adequate alternative siting and alternative mitigation and BMP range must be fully considered – for example, resting any road areas, powerline ROWs, etc. pastures from grazing disturbance for a minimum of 10 years to stabilize soils. Then, after that, grazing if it resumes must be tightly controlled with mandatory conservative grazing and trampling use levels required and very conservative stocking and use levels applied.

Reclamation Concerns

All of the concerns about grazing disturbance, erosion, lack of site stability and recovery discussed by us under stabilization and storm runoff must be fully considered in “reclamation”.

Only locally collected native ecotype plants must be used. Grazing must be removed from existing pastures and/or allotments for a minimum of 10 years. Grazing can resume only after a full candid science-based assessment of the capability and suitability of the lands to support continued grazing disturbance and provide the ecosystem services promised in the EIS from rehab/restoration is prepared. All timing conflicts – such as grazing conflicts with migratory bird nesting and sage-grouse breeding (lek, nesting, early brood rearing) must be eliminated if/when grazing resumes. Sage-grouse require large blocks of lands that are undisturbed by livestock throughout the breeding period. This need is made even greater by the predator-promoting presence of high voltage transmission lines and all the elevated perches and associated disturbance this entails. Any grazing, if it does resume, must be conducted under a “hold harmless” policy for native predators. Agencies must require that grazers accept accountability for any livestock losses, and that permittees implement mandatory measures to limit nest and egg/young predation – carrion removal, no artificial upland water sources with water during the breeding period, no grazing during the breeding period to provide for undisturbed and secure habitats, and any corvid measures must be required to be non-lethal taste aversion, startling devices, etc. We refer you to the newly developing literature on corvid taste aversion control measures and marbled murrelets. Killing corvids or

other predators because of abusive grazing and the impacts of this new powerline must be prohibited. Where, when and to what degree are livestock being imposed on livestock during the breeding season?

Herbicide Uncertainty. We are greatly concerned about the extensive use of herbicides Idaho Power may rely upon. Here we read about "pre-treatment herbicide use". This will do little to no good in lands chronically debilitated by livestock grazing. Following disturbance, especially in any grazed landscapes, we fear agencies will try to use herbicides in copious amounts. BLM cannot rely on its woefully flawed Seventeen States Vegetation Treatment EIS/Weed EIS, or the deficient Oregon Weed EIS for treatment here. BLM still has not completed its local EAs to our knowledge, and the scoping is already many years out-dated. There is ever-mounting evidence of the serious adverse effects of chemical herbicides and herbicide drift and contamination on terrestrial and aquatic biota and humans – ranging from children to amphibians to fish.

How much of each type of herbicide will be used? When Where? How will grazing increase herbicide use? By how much? What happens once the medusahead and/or white top takes over? How EXACTLY will you prevent invasion and outward weed spread into sensitive remaining native vegetation communities – as cheat/medusahead is transported by livestock and vehicles, and takes root in more intensively disturbed areas emanating outward from the line disturbance – such as livestock water sites, along fence lines, in areas where very harmful supplement feeding may be occurring, etc.?

What is the current scientific uncertainty and concern about the effects of herbicides, carriers, breakdown products, adjuvants, etc.? Alone and in combination? New and current risk assessments must be conducted in an EIS.

The rehab info leaves far too much up in the air – for example, just how Idaho Power will effectively prevent lands from becoming choked with medusahead, skeletonweed, etc. once it bulldozes in new roads in sage-grouse habitats or aquatic species watersheds in the alternatives with ill-sited routes.

We believe agencies will be unable to control these impacts – and this will cause serious irreparable harm by promoting invasion into current sage-grouse habitats.

The impacts cannot be "mitigated" by whacking some western juniper somewhere – as seems to be the current agency "mitigation" solution for everything to do with sage-grouse. The current existing sagebrush habitats are vital for the species, and must be avoided.

BLM has not shown there is any certainty at all in rehabbing/restoring habitat. Hopes to "pioneer"/create new habitat sufficient to sustain viable populations by killing native junipers or other short-sighted deforestation or similar schemes in grazed landscapes are woefully inadequate. Plus the so-called "mitigation", i.e. for example

deforestation, is also very likely to increase spread of aggressive invasive species. Removing trees creates a hotter, drier more weed prone site. This increases risk of flammable weed invasion.

Weed transport on vehicles is a serious concern – once vehicles enter a project area, they will pick up seeds and move them into uninfested sites. By creating new hotter, drier, windier, open areas where livestock congregate and flammable invasive annuals or rush skeletonweed thrive – the whole ecosystem is placed at risk. Just how severe is the current weed infestation problem across this landscape? How many acres of each weed – including the REAL problem species – cheat, medusahead, white top, bulbous bluegrass, etc.? A proper pre-project baseline must be provided in a SEIS.

Thus, the BLM must require mitigation by AVOIDANCE of powerline disturbance intrusion into crucial native vegetation habitats – not mere "replacement" of habitat or other claimed habitat creation schemes, and not relying on highly risky rehab – which may fail.

We are very concerned that necessary intensive baseline surveys have not been conducted across the landscape affected by all alternatives so that the current status and condition of habitats and populations of sensitive and imperiled species can be understood. Where are all occupied habitats? What degree of habitat fragmentation exists? What is the total battery of threats facing each local and regional population? What is the viability of the population in the short, mid and long terms?

ALL of this is essential so that mitigation, including mitigation by avoidance of siting - can be developed in a suitable range of alternatives.

Appendix E Must Be Modified to Adopt Actions that Really Do Minimize Disturbance

It is hard to understand why the BLM is not requiring much more extensive use of large helicopters and other methods to greatly reduce the roading and disturbance footprint here.

This may also minimize the "yard" and other disturbance, weed infestations, the need for gravel, the bulldozing and destruction and fragmentation of wildlife habitat, sediment delivered into streams, many of which already suffer from significant livestock grazing, agency vegetation treatment, and road-caused erosion.

Other crucial information is left up in the air in Appendix E. Example:

Roads developed specifically for this project that are identified by the Proponents as no longer necessary will be reclaimed as specified in the Reclamation, Revegetation, and Weed Management Plan. How will this determination be made?

Details of all of this must be provided in much greater detail with the EIS, not delayed until some later plan – otherwise the full battery of significant adverse effects can not be assessed, and the public can have no assurance of effective mitigation.

Cultural Concerns

Significant cultural sites must be avoided and the Line re-routed. There are already many adverse effects to cultural resources from a welter of human development, and incessant livestock grazing and trampling disturbance on public lands – causing site erosion, churning of stratigraphy, exposure an potential breakage of artifacts, and fouling of areas of cultural significance with livestock waste, weeds, etc.

Fire Concerns

The fire prevention plan is minimal. BLM must fully assess how the construction and operation of the line will significantly increase fire risk- through spread of flammable annual grasses, through raptor electrocution, through increased motorized access and catalytic converter fires, etc.

This is yet another reason any segments of the route must avoid native vegetation communities to the maximum extent possible.

There is no valid analysis of how this project increases fire risk- including frequency of human-caused fires.

Noise Concerns

We are very concerned about significant unaddressed noise impacts to wildlife and humans. Construction must not occur during sensitive periods of the year for native wildlife – raptors, sage-grouse, big game – i.e. breeding, birthing, nesting, wintering periods. The constant noise from the high voltage line, linked facilities, vehicle noise, etc. during operation must all be assessed and minimized.

Greatly Inadequate Native Animal Species Measures

The Appendix states:

Sensitive plant or wildlife populations that occur within or adjacent to the ROW and work areas will be marked on the ground, where practical, to ensure they are avoided. If species are discovered during work, IPC will establish a spatial buffer zone and immediately contact the appropriate land-managing agency. Unless IPC is informed otherwise, work outside the buffer area will continue. If IPC needs to work within the buffer area, it will work with the appropriate land-managing agency to develop a mutually acceptable solution that allows the work to be completed within the scheduled outage window and/or in a timely manner. After the project is complete or no longer poses a threat to the plant populations, any marking will be promptly removed to protect the site's significance and location from unwanted attention.

Here, as throughout the EIS and the paltry list of environmental measures, BLM is not even requiring that the measures are rock solid and binding. The entire Appendix E and other parts of the EIS are full of waivers, weasel words, and "outs". The desires of the power company trump other uses. Plus, there are no criteria for determining what is an appropriate buffer, and how the noise and other effects of work continuing may harm or interfere with species.

The buffer zones are much too small to reduce the tremendous disturbance footprint of the activities (both construction and operation). A mere 2 mile lek avoidance is completely inadequate – please review concerns of BLM and scientists related to the China Mountain Wind EIS -= a minimum of five miles or more must be required. IN this greatly fragmented landscape, avoidance of nearly all sagebrush by significant distances is required.

The avian protection plan is greatly inadequate to protect migratory and other avian species.

Every wire on the line must be marked with highly visible avian flight diverters. As technology changes, this must be routinely upgraded, and each year new measures to protect wildlife must be considered and implemented.

Gateway EIS and Similar Mitigation Schemes Are Greatly Inadequate

The Sage-grouse, migratory bird, and other Wildlife Habitat mitigation scheme used in the Gateway EIS is greatly deficient. I prepared comments for WWP on that IPC EIS, as well as an Appeal, and carry these forward by reference into the record for this Boardman-Hemingway EIS. See Comment Attachments.

Appendix H Concerns

Many of our concerns with Appendix H measures are discussed in the Gateway EIS comments that I prepared that should be incorporated into this B2H record. Some have been discussed in the context comments on Appendix E, too.

The Plant and Animal Conservation Plan does NOT:

- *Provides consistency across jurisdictions*
- *Meet the intent of the current BLM and USFS management guidance for federal lands.*

The EIS has greatly failed to take a hard look at the Land Use Plan requirements for protection of sensitive and important species habitats and populations. It does not ensure viability of the local and regional populations, It does not adequately conserve, enhance and restore GRSG and other rare species habitats.

- *Balances cost, practicality, and feasibility of Project implementation with avoiding or minimizing environmental impacts*

It is not clear how this was done.

The EIS did not conduct vital detailed surveys across the landscape to determine upfront what following steps and actions would be needed:

The following steps were taken by IPC to determine which species and habitats to consider for avoidance, minimization, and conservation measures:

Identified potential habitats and special-status species that <u>may occur</u> along the proposed corridor using available data from federal and state wildlife agencies, the BLM, and the USFS .. THIS is not the same as the intensive multi-year all season studies that are required to determine what species do occur, and the status/quality and quantity of their habitats, and how they use the landscape.

The EIS further states:

1. *IPC reviewed maps of the area to identify significant constraints and opportunities for selecting*
2. *12 routes between the new Grassland Substation proposed for construction near Boardman,*
3. *13 Oregon, and the existing Hemingway Substation proposed for expansion near Murphy, Idaho.*
4. *14 Constraints included a wide array of natural resources and man-made features, such as the*
5. *15 Oregon Trail, sage-grouse ( ) leks, airports, urban areas, rural*
6. *16 residences, agricultural features (center pivot irrigation, feedlots, dairies), visual resource*
7. *17 management areas (VRM), areas of critical environmental concern (ACEC), and mountainous*
8. *18 terrain. In the study area, the most extensive opportunities are existing transportation corridors*

9. 19 (Interstate 84), electric transmission lines, and agency-designated energy corridors. The

10. 20 proposed route parallels existing transmission lines where possible but, as required, maintains a

11. 21 1,500-foot reliability separation. In evaluating alternatives, consideration was also given to

12. 22 paralleling the Hemingway to Summer Lake 500-kV line and to the location of the West-wide

13. 23 Energy Corridor and BLM- and USFS-designated utility corridors.

The EIS continues:

1. Certain plant and wildlife resources were identified as constraints to be avoided, including the following:

A 785-foot buffer around occupied Washington ground-squirrel) burrows

A 2-mile buffer around occupied greater sage-grouse leks. This is greatly inadequate. A minimum 5 mile buffer must be used. Please Jarbidge BLM China Mountain Wind DEIS.

A 300-foot buffer around streams that contain bull trout (), cutthroat trout, redband trout, Chinook salmon, coho salmon, or steelhead.

This is greatly inadequate, and entire watersheds occupied by these ESA-listed and sensitive fish species should be avoided – due to intensive impacts of road cuts, increased road footprint and density, herbicide use and drift, de-vegetation and clearing by the line, and other effects. A detailed analysis of the whole array of serious adverse effects and threats to these watersheds must be provided. What is the water quality? Water quantity? Are there TMDLs? What have population surveys shown about stats and trends of populations? What are the Occupied vs. Unoccupied reaches?

BLM's ACECs and wilderness study areas must be protected. Yet BLM has actually considered Alt segments that impose significant harms.

IDFG and ODFW bighorn sheep (*Ovis canadensis nelsoni*) range is present. Segments of the line goes right by and/or through such range in ID and OR. Construction measures are not adequate to avoid harmful disturbance, and appear to be able to be waived. These populations are also stressed by the proximity of diseased domestic sheep, other forms of human disturbance, grazing degradation of habitats, etc.

ODFW mule deer and elk, winter range IDFG big-game crucial winter range
Pronghorn antelope, habitat in the Idaho, Boise BLM District. Same as with bighorns – these populations are stressed by livestock grazing and much other human disturbance and fire loss of habitats, and invasive species.

The EIS Plan states: *Other plant and wildlife resources (such as high-quality sagebrush habitats and big-game winter range and calving and fawning areas)* ***were not necessarily avoided during routing and siting but were considered a constraint and taken into consideration during design of the proposed Project.*** *Proximity of the corridor to urban areas, agricultural areas, and rural residences was taken into consideration during the routing and siting.*

This means IPC just went ahead and proposed to punch its route right through areas that must be avoided, and where effective mitigation will be impossible.

IPC refers to an August 2010 siting study. That study's data is 5 years old, and the siting study must be re-done - to fully address climate change, drought, large-scale fire loss of habitat, continued declines and imperilment of species, new science on invasive species, etc.

This document is written so loosely and nebulously that it is impossible for a reasonable person to understand the effects of the actions and alternatives.

Based on the desktop analysis and through consultation, IPC will conduct surveys, **where necessary**, prior to construction and in the appropriate season to meet agency survey and timing requirements for several biological resources. These surveys will include he following:

Greater sage-grouse lek survey. There needs to be much more intensive upfront data collection over the course of at least 2-3 years of all seasonal habitat se throughout the landscapes affected by all potential routes and route segments. How much high quality habitat remains for the affected populations – the loss must be put in context.

Washington ground-squirrel burrow survey. Same as sage-grouse – a burrow survey is simply not sufficient. Where is all occupied habitat? Where have squirrels been eliminated? What restoration is necessary to restore and re-connect habitats?

Concurrent northern goshawk and three-toed woodpecker survey. WHERE is this data? Where are all occupied habitats, what is their condition, what is the status of the local and regional population?

Concurrent great gray owl and flammulated owl survey. WHERE is this data? Aren't there many other species of concern? What about burrowing owl, for example?

Project-wide raptor nest inventory. Again, the footprint of the project must be assessed in the context of the landscape affected. What is the status and trends of the local and regional populations?

Pre-construction Columbia spotted frog surveys. As with all these species, delaying surveys until the bulldozers are revved up is a major concern. Frogs and toad species will be exposed to degraded water quality, increasingly fragmented habitat, potential herbicide drift, vehicle mortality, etc. Grazing and water developments and e-watering is already a very significant threat. Is chytrid fungus an identified problem in this area? How degraded, fragmented and reduced are habitats due to livestock grazing and trampling, and livestock water developments such as spring developments? Livestock water developments have serious adverse impacts to sage-grouse brood rearing habitats as well – fostering environments where West Nile mosquitoes breed, reducing and diminishing flows thus shrinking available habitat, etc.

What about long-billed curlew? Sage thrasher? Loggerhead shrike? Brewer's sparrow? Pygmy rabbit? Sage sparrow? California bighorn sheep? Do they just get bulldozed over?

The plan pats itself on the back about "the avoidance and minimization accomplished through routing" – long before there is any certainty that this has occurred, and in ignoring a series of viable alternatives that were not even analyzed, IPC has no basis for claiming it is minimizing anything. It refers to: conservation measures which are presented in Appendix E of the POD. The info throughout the POD is deficient and minimal, and cannot be considered sufficient since the data necessary to understand just where the route would be sited and just what it will impact has not been collected yet.

The ***Construction Scheduling and Monitoring*** component is also woefully deficient.

Avoidance can be spatial and/or temporal. Where disturbance during construction is of concern, construction is proposed to be limited to periods of species' absence or reduced presence. In addition to limited operating seasons, which categorically restrict construction, environmental monitoring is also proposed where construction may be permitted, but its conformance with minimization measures should be monitored and enforced. Environmental oversight will be conducted for construction activities. Monitoring entails being present during these activities, communicating with contractors, taking daily notes, ensuring all impacts occur within the designated limits, ensuring the requirements of the Project environmental protection measures (EPM) that IPC has incorporated as part of the Project are being met, and using best professional judgment to ensure Project activities do not adversely affect special-status plant and wildlife species. A biological monitor has the authority to issue stop-work orders when agreed conditions protecting wildlife or plant species are being violated by the construction contractor. A biological monitor will work with the construction contractor, the regulatory agencies, and IPC to ensure EPMs are enforced and to resolve non-compliances.

There is no certainty in any of this. It appears the Plan is to let "non compliances" happen, and when it is too late, give the contractors a reprimand, or something. The Plan also states: *The details of IPC's environmental compliance program, including roles and responsibilities, pre-construction surveys, monitoring, and reporting, will be detailed in the construction POD.*

This must be provided in a SEIS.

Limited and Constrained Conservation Measures

The agency claims that to develop conservation measures, it:

Identified and reviewed the BLM and USFS LMPs applicable to the Project area (Table H-2)

For each LMP, recorded the surface-use stipulations specific to each species of concern

Identified inconsistencies in requirements among jurisdictions

Determined exception or waiver criteria if applicable

Used FWS avoidance recommendations when applicable

Incorporated ODFW species-specific management recommendations

Evaluated the stipulations on a resource-by-resource basis and developed the proposed Project-wide temporal and spatial restrictions ***and exception criteria*** *…*

In other words, there is a loophole and a way out if anything inconveniences IPC too much.

Land-Management Plans

Again here the Plan just cherry-picks some provisions and does not provide the whole picture**.**

Pygmy rabbit, burrowing owl, and all other special-status species and habitats through a terrestrial visual encounter survey of the entire route and all associated features … WHERE is a study of the current habitat extent, quality, quantity, and population status now --- upfront?

The literature presented in the plan is also greatly inadequate and outdated. See Lit CD attached – with sagebrush species info, grazing effects info, development effects info, invasive species papers, microbiotic crust papers, etc.

The alternatives and mitigation must fully take into account the serious adverse indirect and cumulative impacts from the huge burden of livestock grazing occurring across the Owyhee, Malheur, Baker, Umatilla and Wallow-Whitman Plans

A SEIS must be prepared on the basis of the gross omissions admitted here:

*Finally, **IPC did not include all measures found in all LMPs.** Measures not included are those which are not specific enough to define a measurable stipulation, measures that describe general goals for the federal lands but do not address new projects specifically, measures that address habitat management and treatment versus discrete temporal and spatial restrictions on project activities, cases in which the expectations of one LMP extend well beyond that of the other plans, and measures not practical from a project design and development perspective.*

Basically, BLM and USFS have allowed IPC to arbitrarily ignore a large body of very important environmental protections by pretending they were too general or otherwise unclear. What are these measures that are so unclear to IPC? Please provide a detailed rationale for exclusion. For example, if an RMP or Forest Plan states that there will be no significant adverse impacts to sensitive species – how is that addressed in this morass of an EIS with a whole series of minimally effective and uncertain Appendices, BMPs, and linked still-uncompleted plans and surveys?

The full intent of the LUPS regarding biota, water, watershed, soils, native vegetation, cultural and other concerns must be fully laid out and a good faith effort made to ensure compliance with these provisions. What has occurred is IPC has just picked the often minimal measurable protections, and ignored the substance of the LUPS, sensitive species policy, the National Technical Team Report and IMS, etc.

Highly Damaging Components "Poison Pills" Still Present in Preferred Alternative

The Preferred Alternative remains very harmful for a wealth of wild land, watershed, and sensitive and important species habitats.

Some Alternative routes included in the Preferred Alternative map are often even worse – destroying sage-grouse habitat, big game habitat, migratory bird habitat, rare plant habitat, and areas of high importance for public recreational uses and enjoyment. Examples: Malheur Alt, Willow Creek Alt, Burnt River canyon Alt Timber Alt.

BLM has failed to include a very viable alternative for siting the project north of Ontario in Idaho that was recommended by Gene Bray and others in scoping on this project.

Sage-Grouse Mitigation "Blueprint" 2013

The mitigation "Blueprint" is greatly inadequate. The minimal measures will result in a permanent range contraction – in Oregon. It also will cement in permanent abandonment of sage-grouse recovery in the Idaho portion of the Preferred Alt route.

An overarching concern is that the strategy fails to recognize how depressed and low the populations of GRSG and other TES species really area; how fragmented the habitat already is; and the grace threats from continued irreversible weed expansion that truncated plant success and recovery of sagebrush ecosystems – particularly in grazed landscapes.

The elaborate mitigation scheme, full of economics jargon, is based on a fantasy, i.e. that IPC can build its new line in the midst of remaining vital occupied habitats, and somehow create a new habitat of equal or better attributes for sage-grouse population viability somewhere else. That is simply not the case. Sage-grouse populations will not be sustainable and will not be conserved, enhanced and restored by trying to "create" new habitat in steeper, rugged, forested terrain, and in areas that are pounded to death by livestock given the severity of the medusahead, cheatgrass, bulbous bluegrass and other weed threats, and the general loss of sagebrush in this region from past agency treatments, fires, and chronic abusive grazing that has prevented recovery following disturbance– no matter how many trees agencies spend tens of millions of dollars killing.

The Plan is full of unacceptable levels of uncertainty. It basically starts out by allowing waivers of unknown kind and manner, stating that "different approaches" may take place over time. Yet it fails to provide crucial sideboards that protect the ecosystem values.

Moreover, federal agencies are constantly shifting and shrinking sage-grouse habitat of high importance to placate industry. See WLD letter to Sec. Jewell and Director Kornze related to the series COT PAC and Super-PAC habitat cuts. Interior is buffeted by political winds and has failed to stand up to energy and livestock interests. See for example, recent Sage-grouse scientists letter.

All current occupied habitat and habitat identified for restoration must be considered of highest importance – in the context of these small and increasingly isolated populations that will be seriously impacted by the preferred alternative and lack of adequate certain and effective mitigation and conservation measures.

BLM, FWS and state game agencies are constantly shrinking back habitat of importance, and appear to have done so to accommodate this and other recent projects.

All Occupied habitat must be mitigated at the highest level – since the current agency mapping categories are so politicized (See WLD letter to Sec Jewell and BLM Director Kornze on Super PAcs, COT PACs, Core and state mapping segregation efforts to diminish habitats of importance for protection. The habitat is so highly

degraded and populations at such low levels ALL Occupied habitat in the Baker, Brogan, Malheur, SW ID region must be considered highest priority.

What are the populations and what numbers of birds are present on all leks for all periods of time? How have all important seasonal habitats been identified for all periods of time? Where have leks blinked out? Where are numbers not viable any longer? What is the cause of the loss of leks, loss of viability etc.?

The analysis must also include the shameful abandonment of the Idaho Weiser population in the Otter state plan which was used to dumb down the BLM PPH and PGH even further. This will further isolate the very small Oregon population north of the Snake River, and decrease viability.

The Preferred Alternative fails to adequately **avoid** and prevent damage to "ecosystem services". The EIS and the mitigation plan treat low density PGH as a sacrifice habitat. The necessary risk of extirpation, range contraction, and/or perforation analysis has not been conducted for all alternatives. This must be done upfront, as a basis for determining the type and degree of mitigation to be applied, and if an alternative and/or segment is even a viable alternative.

While the EIS and DEIS App. E loftily discuss "avoidance" the necessary baseline data and analysis to determine just how great an area must be AVOIDED if the population is to be sustained has not been conducted.

The minimization measures are themselves Minimum, and a pittance compared to what is actually needed. Moreover, these measures are primarily based on some reduction in impacts during construction and do little to address the serious adverse impacts of the powerline's presence over time. These include: Flammable exotic weeds emanating outward, a predator travel corridor, increased predation from elevated structures, increased human disturbance, increased livestock access and disturbance, permanently fragmented and reduced habitat quality over a broad area of the landscape, potential grouse and other wildlife avoidance of electromagnetic energy and visual impacts of the line.

As BLM proposed with the abandoned China Mountain wind facility EIS, the full footprint of the line must be examined – and it must be considered to have a serious and significant adverse disturbance footprint across an area extending outward 4 or 5 miles or greater. THAT is the disturbance footprint that must be used in addressing mitigation and the type of mitigation to be applied. Moreover, the footprint and degree to which the line, roads, gravel pits, lay out yards, etc. in combination with the powerline and in combination with the cumulative threats will adversely affect the habitat and population viability must also be fully assessed.

The rehab measures are highly uncertain, will use large amounts of herbicides that may drift, harm non-target vegetation, and contaminate the environment. There is no assurance in the drought-plagued, livestock-desertified and livestock-grazed burgeoning weedlands of much of the route if the measures will do anything positive for wildlife. For example, if BLM insists on seeding created wheatgrass or coarse pseudo-native cultivars because the agency refuses to address grazing impacts in an integrated manner, then weeds are certain to ultimately proliferate in the landscape and habitats supposedly being "restored".

Before BLM can determine any level of in kind, out of kind, in proximity, and off-site mitigation, it MUST take a hard landscape-level look to determine the crucial values (from nesting habitat to connectivity) that the full footprint of the line and all associated activities during construction and operation will have – direct indirect and cumulative impacts.

AND the hard question must be answered: Will the range be increasingly perforated, and contract due to the cumulative effects of this line?

Sage-grouse are already deserving of ESA listing. Yet the EIS and so-called "mitigation" Plan continue to treat much of their currently Occupied habitat as disposable - without ever taking a hard landscape-level look at the full complement of habitat needs and their dispersion in the landscape.

State Mitigation Schemes Are Highly Flawed and Overwhelmingly Favor Industry

The DEIS's economics jargon-laced Plan states:

ODFW's SGMF identifies habitat disturbance weightings that will be used for the purposes of calculating mitigation acres. To assess the likely contribution of mitigation actions towards "no-net-loss" the SGMF recommended that three key elements are considered: additionality, probability of success, and time lag to conservation maturity. Additionality is defined as a mitigation action's new contribution to conservation in addition to existing values. Probability of success is defined as likelihood that a mitigation action will deliver expected conservation benefits. Time lag to conservation maturity is evaluated as the length of time for a mitigation action to deliver conservation at a maturity level (or ecological state) similar to that which was lost at the impact site. Per the guidance of Governor Otter's federal alternative in Idaho, sage-grouse populations and their habitats will also be assessed.

Please review the ID E MT GRSG BLM DEIS comments submitted to BLM for the DEIS that I prepared when with WWP regarding how the ID plan (and the OR plan suffers from the same flaws) allows development to incrementally eat into and destroy GRSG habitats, as long as some effort is thrown at some form of mitigation somewhere. This explains how seriously flawed the ID state plan is, and the OR plan is little better. In fact Oregon habitat mapping is greatly deficient and enables writing off vast areas of the landscape and occupied habitat as being of lesser or no importance to GRSG. It is based to a great extent on the seriously flawed core

Model, which does not work in a naturally fragmented habitat overlaid with a landscape as fragmented by human activity as this one is. In fact, both the ID and OR plans create large areas of sacrificed Occupied Habitat.

These in reality are Plans for Extinction.

The Plan also states:

Conservation actions should be located where efforts have the greatest likelihood of producing the required benefits. In Oregon, generally, such locations will include priority sage-grouse areas identified via SGCS planning efforts, areas that supplement or expand existing protected areas or that serve to increase the connectivity between such areas, designated Conservation Opportunity Areas, etc. In Idaho, priorities will focus within or near PPH, and in accordance with best science.

What is in reality happening is that both plans allow entire populations to be wiped out, as long as some dollars are thrown at some kind of manipulation near one of the ever-dwindling remaining populations somewhere else.

Oregon experienced a very large wildfire in 2014 that further impacted and fragmented significant areas of habitat just to the southwest of this line. Given that, and the previous Long Draw and Holloway fires of 2012, and all the past agency vegetation treatments (like the immensely damaging Vale project that converted vast areas of sagebrush and sage-grouse habitat to livestock forage grasses and a high density of livestock facilities. These Vale areas have repeatedly burned and burned and burned again, this "carve up the habitat more, but throw mitigation dollars somewhere" approach is not acceptable.

We do support some parts of the mitigation:

Mitigation actions are more likely to be meaningful to conservation of sage-grouse if they are aggregated; larger contiguous parcels are preferred and small isolated sites will rarely suffice. In all cases, the aggregated mitigation areas must be large enough so that they will, either in themselves or in conjunction with adjacent landscape conditions, provide the targeted biological benefits. Mitigation actions that are not readily measured in acres (e.g., ***fence removal*** *or marking) will be evaluated on a case by case basis*. We support large-scale fence removal!

Mitigation should not be located in areas directly impacted by the Project or in areas where the success of the actions or maintenance of the required benefits are likely to be obviated over time by incompatible land-uses.

Actions proposed as mitigation must provide benefits beyond those that would already be achieved under other applicable regulations and/or land-use management plans.

But we do not understand, then, how the segments that impact the PPH and significant areas of PGH - essentially all Occupied habitat in these lands with small and greatly stressed populations, will be possible to mitigate in any effective way.

If there is to be "ecological uplift" there needs to be a tectonic shift in agency attitudes towards standing up for what the species need. HOW will the chronic and cumulatively harmful weed-producing, habitat degrading and impairing and rehab destroying, weed-promoting and landscape-destroying grazing footprint get dealt with?

There is also grazing down-warp/subsidence pressing hard and trampling down to keep any potential "uplift" of mitigation down.

What is the baseline of the current battery of often minimally effective and/or downright harmful so-called "restoration being conducted by NRCS? What actions – type, acres, etc. have occurred in all specific areas,and/or are foreseeable and planned?

The Plan states:

With respect to sage-grouse and their habitat, some impacts may persist beyond the operational life of the Project, or there is significant uncertainty as to the persistence of the impacts. Therefore:

◦ *It should be assumed that most Project impacts to sagebrush habitat are long-term or permanent in nature.*

◦ *The benefits derived from proposed mitigation actions must therefore also be long-term or permanent in nature.*

Because most impacts typically begin to occur in the very early stages of a project (i.e. construction and initial operations), the benefits of the Project's proposed mitigation actions must also begin to accrue as early in the life of the Project as possible; implementation of mitigation actions should be heavily "front-loaded" to facilitate this. Any time lags that will exist between the occurrence of impacts and attainment of benefits, either due to the nature or schedule of the mitigation actions, should be compensated for via additional mitigation.

Then, agencies flailing about cutting trees in areas with the precip.,elevation and other site characteristics of western juniper will not be permanent – as re-establishment of the species which is the native climax species in many sites will occur. WLD stresses that the EIS cannot rely on the severely flawed NRCS Ecosite descriptions, as these are models often based on severely flawed fire return and disturbance intervals – and so end up with entirely inaccurate predictions/models of habitat type.

Continuing to graze and deplete areas where "mitigation" seedings/treatments have occurred will accelerate the deterioration and demise of the so-called "improvement" that is to be the mitigation.

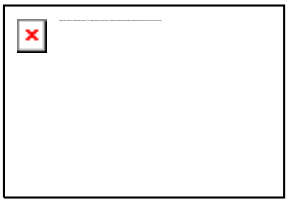
The EIS states:

The Project's HMP should include regulatory, financial, and legal mechanisms that assure that each mitigation action's target biological conditions, for a time period commensurate with impacts, for sage-grouse will be attained and maintained as necessary.

If the EIS is indeed going to be effective in providing mitigation, then it must amend the various Land Use Plans to allow for closure, and for permanent retirement of grazing allotments where mitigation is claimed to be taking place (habitat "improvement", land acquisition, etc.).

Please contact us if you need any clarifications of these comments. We request a meeting to discuss our concerns.

Sincerely,



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Attachments: Scientific Literature CDs, comment letters, agency documents