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From: Bill Richardson <brichardson@RMEF.ORG>
Sent: Wednesday, March 18, 2015 5:49 PM
To: comment@boardmantohemingway.com
Cc: Dave Wiley (davewiley@wvi.com)
Subject: RMEF Comments: Boardman to Hemingway Transmission Line Project DEIS
Attachments: RMEF Comments B2H DEIS.pdf

Please find attached the RMEF comments on the Boardman to Hemingway Transmission Line Project DEIS. Please let me know if you have any questions or if you need additional information.

Thank you,
Bill



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March 18, 2015

Boardman to Hemingway Transmission Line Project
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Subject: Comments - Draft Environmental Impact Statement (DEIS) and Land Use Plan Amendments (LUPAs) for the Boardman to Hemingway Transmission Line Project (Project)

The purpose of this letter is to provide the Rocky Mountain Elk Foundation's (RMEF) comments regarding the DEIS and LUPAs for the Boardman to Hemingway Transmission Line Project.

After careful review of the DEIS, RMEF continues to be very concerned about negative impacts to elk, other wildlife, and their habitat from construction and operation of the proposed Boardman to Hemingway Transmission Line Project.

The several proposed routes for the transmission line traverse hundreds of miles of wildlife habitat. Construction and maintenance of the transmission line will have adverse impacts on the habitat and displace wildlife both temporarily and long term. Habitat fragmentation and potential for spread of invasive vegetation species carry more long term, lasting effects. The builders and operators of the transmission line must be required to take specific actions to avoid adverse impacts whenever possible and to mitigate impacts when they cannot be avoided. The route of the line includes critical habitat for sage grouse, a species being considered for listing under the Endangered Species Act, and critical elk and deer range.

RMEF is pleased to note the majority of our concerns and recommendations submitted at scoping are adequately addressed in Appendix C –Design Criteria.

The Rocky Mountain Elk Foundation suggests the following design criteria be made a condition of the construction and operation licensing of Boardman to Hemingway Transmission Line for the life of the facility:

1. Continue to consult and collaborate with state and federal wildlife agencies and agency biologists at every opportunity in order to minimize and avoid negative impacts to wildlife.



2. Mitigate habitat loss and fragmentation caused by construction of the transmission line through acquisition and permanent protection of suitable wildlife habitat.
3. The Design Criteria related to noxious weeds control, Appendix C page C-5 and C-17 should be strengthened. RMEF recommends during construction where noxious weeds are present, control or eliminate infestations, and re-seed and/or plant disturbed areas with native vegetation to help prevent re-establishment of noxious weeds. During operation of the project, annually survey for noxious weeds and control any noxious weeds found.
4. RMEF recommends adding Design Criteria which would require within state or federal designated elk and deer range, particularly critical winter range, creation and maintenance of big game forage meadows within the transmission line right of way. These linear habitat plots have been very effective on other transmission corridors. Collaborate and cooperate with state and federal wildlife biologists in selection of forage meadow sites and selection of forage vegetation species.
5. Please consider adding design criteria for creating a “U” shaped transmission line corridor, feathering the edges with shrubs and low growing trees to provide increased security for wildlife, where vegetation types permit. The design criteria should include leaving or developing “shrub islands” to provide increased forage and security in the transmission line right of way.
6. A Design Criteria is needed to provide for development and maintenance of springs and seeps along the right of way to provide water for wildlife while reducing or eliminating harmful soil erosion.
7. RMEF is pleased to find Design Criteria OM-5 providing for control of public vehicular access to service roads within the transmission line right of way to limit disturbance of wildlife, reduce soil erosion and limit spread of invasive vegetation. (Appendix C, page 16) On these roads closed to the public, there is still a need to monitor for noxious weeds as vehicles are one of the primary mechanisms of weed dispersal as the company and land management agency personnel will continue to use these roads administratively.
8. Establish a wildlife habitat mitigation trust fund to be used for acquisition of habitat to mitigate effects of transmission line construction, maintenance and operation over the life of the project.

RMEF stands ready to collaborate and assist with efforts to minimize harmful effects to wildlife. We offer our assistance and expertise on wildlife habitat restoration and enhancement, mitigation and permanent land protection. The Elk Foundation participates in numerous energy-related settlement agreement negotiations and habitat acquisition projects to mitigate impacts of energy development on wildlife with a wide variety of energy providers across the west.



RMEF is a non-profit conservation organization whose mission is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. The Elk Foundation also works to open, secure and improve public access for hunting, fishing and other recreation.

Thank you for the opportunity to comment on this project.

Sincerely,

Bill Richardson
Oregon & Washington Sr. Lands Program Manager
Rocky Mountain Elk Foundation