

comment@boardmantohemingway.com

From: Blake Weathers <bweathers@nru-nw.com>
Sent: Thursday, March 19, 2015 5:32 PM
To: comment@boardmantohemingway.com
Subject: Comments Regarding the Boardman-to-Hemingway Draft Environmental Impact Statement
Attachments: NRU B2H Comments FINAL.docx

Hello,

Please find Northwest Requirement Utilities' comments on the Draft Environmental Impact Statement for the Boardman to Hemingway Transmission Project attached to this email.

Regards,
Blake Weathers

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March 19, 2015

Boardman to Hemingway
Transmission Line Project
PO Box 655
Vale, OR 97918

Submitted via: comment@boardmantohemingway.com

RE: Comments Regarding the Boardman-to-Hemingway Draft Environmental Impact Statement

Northwest Requirements Utilities (“NRU”) appreciates the opportunity to provide input to the Bureau of Land Management’s Draft Environmental Impact Statement (“DEIS”) on the Boardman-to-Hemingway Transmission Project (“B2H Project”). NRU is a non-profit trade association of 54 public power utilities that rely upon the Bonneville Power Administration (“BPA”) as their primary or exclusive supplier of wholesale electric energy. These utilities account for nearly 25% of BPA’s wholesale public power sales in the Northwest, and nine utility members of NRU would be directly served by the B2H project. We understand that the purpose of the DEIS is to analyze the potential impacts on the natural and human environment from the construction of a single-circuit alternating-current, 500-kilovolt overhead electric transmission line with ancillary facilities. The DEIS will also consider the purpose and needs of the relevant federal agencies that may be impacted by the B2H Project. Overall, NRU supports the findings in the DEIS, and we would like to take this opportunity to address the purpose and needs related to reliable load service provided by the B2H Project, as well as the findings associated with the northern terminus alternatives.

For BPA, the B2H Project will be critical to provide low cost, reliable load service to public utilities located in Idaho, Nevada, and Wyoming. The B2H Project would become part of the Northwest to Idaho transmission path, which is one of the most congested transmission paths on the contiguous Northwest transmission system. In fact, there is currently no Long-Term Firm capacity available on the existing Northwest to Idaho transmission path for the next ten years. The B2H Project would relieve the presently congested Northwest to Idaho transmission path and provide greater reliability for the Northwest transmission system. Additionally, the B2H

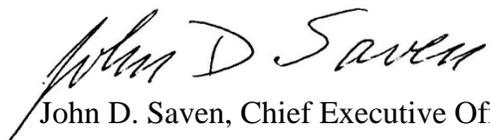
Project represents the lowest cost option for BPA in meeting its contractual obligations for load service in southeast Idaho. This is especially important in light of the pending termination of the Southeast Idaho Exchange Agreement between BPA and PacifiCorp. In summary, the B2H Project will provide BPA a long term, low cost option in meeting its contractual load service obligation.

In response to the four alternatives that the DEIS considers for the northern terminus of the B2H Project, NRU believes that the Longhorn Variation Alternative is the most viable option. In short, the Longhorn Variation Alternative best mitigates the environmental impacts resulting from the B2H Project while also meeting the purpose and needs of the impacted federal agencies. This is demonstrated by the following:

- The DEIS determined that the Longhorn Variation Alternative is the Environmentally Preferred Alternative for the northern terminus, and along with the first Longhorn Alternative, it has the least amount of ground squirrel habitat impact. Meanwhile, the Proposed Alternative and Horn Butte Alternative have the greatest amount of ground squirrel habitat impact.
- The concerns raised by the U.S Department of Navy regarding the encroachment on military airspace created by the Longhorn Alternative are alleviated by the Longhorn Variation Alternative.
- The Longhorn Variation Alternative also minimizes the impacts to agriculture, and is aligned with an existing transmission corridor.
- From an electrical perspective, the Proposed Alternative and Horn Butte Alternative are less desirable for BPA, as they provide no direct interconnection to the BPA system.

In closing, NRU supports the DEIS process and the findings that were made by the BLM in regards to the environmental impacts as well as the effects on the purpose and needs of the impacted federal agencies. We also concur that the Longhorn Variation Alternative is the best option for the northern terminus of the B2H Project. Finally, we would like to emphasize the importance that the B2H Project has on BPA's ability to providing low cost, reliable load service to the region. Thank you for the opportunity to comment on the DEIS for the B2H Project.

Regards,



John D. Saven, Chief Executive Officer