

comment@boardmantohemingway.com

From: jbosma@bentonrea.com
Sent: Tuesday, January 27, 2015 1:19 PM
To: Comment@boardmantohemingway.com
Subject: Boardman to Hemingway (BAH) Transmission line:
Attachments: SAGE HOLLOW RANCH LLC-Longhorn Alternative environmental impact ltr.docx;
Memorandum to Jeff Bosma - Sage Hollow Ranch, LLC.doc; Dr. Dan Ltr re Powerlines.docx

The following comments pertains to the potential environmental impact of the Longhorn Alternative of the Boardman to Hemingway (B2H) Transmission Line as it crosses our dairy operation.

Sage Hollow Ranch is a Concentrated Animal Feeding Operation (CAFO) which operates under a federal National Pollutant Discharge Elimination System (NPDES) permit. Over the last eight years we invested over forty million dollars in our operation, which is monitored very closely by EPA as well as the Oregon DEQ, for compliance with the requirements of our Animal Waste Management Plan (AWMP), in order to insure that we do not contribute any nitrates to the ground water and an aquifer which has been designated as a critical ground water area for nitrates. The area is under the supervision of the Lower Umatilla Ground Water Management Area (LUBGWMA). The location of 3.5 miles of High Voltage Transmission Lines on our farm, contemplated by the Longhorn Alternative, will make it virtually impossible to meet these requirements.

Additionally, we are concerned about the impact of long term exposure to induction and electromagnetic fields on our dairy animals, which will spend their entire life (in excess of 10 years) directly under the high voltage line.

These issues are more fully explored in the attached correspondence from us and from our environmental, and our animal health consultants.

In conclusion, we believe that both the Horn Butte/Southern Alternative, and the Longhorn Variation/East Bombing Range Road Alternative, have less potential environmental impact on the critical groundwater area, and are the preferred routes.

John, Jeff and Brian Bosma
Sage Hollow Ranch LLC
Homestead and Poleline Rds
Boardman, Or

SAGE HOLLOW RANCH LLC

Poleline & Homestead Rds.

Boardman, OR 97818

Sue Oliver, Energy Facility Siting Officer
Oregon Department of Energy
395 E Highland Ave
Hermiston, Or 97838

Re: B2H Transmission Line Project.

Dear Ms. Oliver,

We are writing to provide background material to aid in your understanding of the adverse environmental impacts the Longhorn Alternative route of the B2H transmission line will have on our operation. Our dairy farm consists of two 640 acre sections (Sect. 4 and 10 of 3N 26 E) which are diagonal to each other: the northwest corner of Section 10, in which the barns and corrals are located, touches the southeast corner of sect. 4. Both sections are surrounded on all sides by the Boardman Tree Farm. We have a reciprocal right of way agreement with the tree farm which allows both enterprises to move water and equipment over the common corner. The current routing of the Longhorn Alternative follows the south and west edges of our property for over 3.5 miles, creating substantial obstacles to our ability to meet our obligations under our Confined Animal Feeding Operation (CAFO) and our National Pollution Discharge Elimination System (NPDES) permits. Violations of these permits expose our operation to enforcement actions by the regulatory agencies, which may levy fines up to \$37,500 per violation per day, as well as citizen lawsuits, under the Clean Water Act (CWA). Failure to meet our environmental obligations is simply not an option.

Sage Hollow Ranch LLC is family owned and operated by myself and my two sons, Jeff and Brian. We have operated dairy facilities in the Yakima Valley of Washington since 1977. We purchased our Boardman farm in 2006 to expand our operation and provide opportunities for the next generation. The process of getting approvals and permits from the various agencies which regulate the dairy industry took two years. After lining up financing for the \$40M project,

construction was started in 2009 and in 2010, after obtaining a supply contract with Tillamook Creamery, through our membership in Darigold, milking operations commenced.

To our knowledge there is no part of agriculture more closely monitored and regulated than dairy farms. Every aspect of our operations is closely monitored for compliance with the requirements of the Food and Drug Administration (FDA), the Environmental Protection Agency (EPA), The Oregon Department of Environmental Quality (DEQ) and the Oregon Department of Agriculture (ODA). We submit reports to ODA of all our applications of effluent and solid waste to the land, including the amount applied, the nutrient content of the material, the date of application, and the weather conditions at the time of application. This information, together with extensive after harvest soil tests which are also required, is used to calculate whether we applied effluent to our fields in excess of crop requirements. The environmental community maintains that any such over application constitutes a “dumping” of toxic waste and has filed suit in Yakima (WA) to enforce the application of the Emergency Planning and Community Right to know Act (EPCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) which require additional extensive reporting and exposes us to additional fines of \$37,500 per day per violation.

Our farm is located within the boundaries of the Lower Umatilla Basin Ground Water Management Area (LUBGWMA). The GWMA was formed by the Oregon DEQ because the nitrate-nitrogen content of ground water exceeds the federal safe drinking water standards. The LUBGWMA committee oversees agricultural and processing activities in the area and monitors progress toward the goal of reducing the nitrate-nitrogen levels in the aquifer. The activities and progress of the committee are in turn monitored by EPA which has the enforcement authority of the CWA.

We were very careful in selecting the site to locate our dairy facility. We spent approximately 5 years evaluating various sites in both Washington and Oregon. We carefully calculated the carrying capacity (matching the number of farmable acres with the nutrient content of the effluent and solid waste generated), costs, margins, etc. for each site. It was no simple matter to obtain our CAFO/NPDES permit to locate in an area where the aquifer was already contaminated with nitrates as a result of the previous agricultural and processing activities. The impact of the Longhorn Alternative of the B2H transmission line will substantially

alter these calculations and will make it difficult if not impossible to meet obligations under the CAFO/NPDES permits.

Our CAFO/NPDES permits are based on an Animal Waste Management Plan (AWMP), which essentially describes how we plan to use the nutrient load generated by our animals in our farming operation without allowing any nitrates to migrate below the root zone and add to the ground water contamination. We use a continuous cropping pattern, corn during the summer season followed by a winter forage, usually triticale, and rotated periodically with alfalfa. We apply nutrient from effluent or solid waste based on our soil tests, the requirements of the crop, and the expected yield. Although minor fluctuations in yield are allowed for, any major reduction, such as could from such a lack of sufficient irrigation water or an infestation of pests, can leave substantial nitrogen in the soil and risk contamination of ground water.

We have minimized the risk from a lack of sufficient irrigation water by having not only ground water, but also a supplemental water supply from the Columbia river through the Columbia Improvement District (CID).

We use aerial spraying to control insects in growing crops. In the case of corn, the primary pests are spider mites which can reduce the corn silage yield by as much as 40%. Insecticides are effective against this pest, but must result in total eradication or the mites will quickly be reestablished and will develop resistance to the insecticide. Total eradication is not possible if a part of a field cannot be sprayed. The effective control of insects is particularly critical because our farm is surrounded on all sides by the Boardman Tree Farm, which uses aerial spraying to control insects in the trees, making our property a refuge for insects fleeing that treatment.

We also use aerial over seeding of triticale into the corn crop before harvest. This allows the winter forage to be established while there are heat units and water available and insures a continuous uptake of nitrogen. It also allows a window after the corn harvest to empty our effluent ponds unto these fields while there is an already established crop to use the nitrogen. We operate on highly leachable soils and failure to have crop uptake during the winter rains can result in substantial movement of nitrogen to ground water.

The 250 foot right of way of the Longhorn Alternative along the south and west edges of each section, effectively eliminates approximately 110 of the 1100 acres

of our spray fields. In addition to that, the erection of overhead transmission lines will severely restrict our ability to use aerial spraying of insecticides and over seeding of our crops on the remaining acres. These impairments will severely restrict our ability to meet our environmental obligations and the requirements of our state and federal CAFO/NPES permits. Violations of these permits will lead to additional reporting and oversight by state and federal agencies and potential additional fines, and may result in further degrading of the ground water.

The Longhorn Alternative of the B2H Transmission line, as currently proposed by Idaho Power, will result in significant environmental impacts to our dairy operation and is not compatible with our environmental goals and the requirements of our permits. We cannot responsibly operate our dairy farm under those conditions.

Sincerely,

John Bosma

Sage Hollow Ranch LLC

I am writing in regards to the 500 kV line that has a proposed route through the cow corrals of my clients, Sage Hollow Dairy and Meenderink Dairy.

My name is Dan Vander Stelt and I am the herd veterinarian for both of these dairies. I have been working with each of them since they began operating; Sage Hollow in 2007 and Menderink Dairy in 2012. My relationship with them consists of weekly herd visits involving reproduction, health and disease consultation, record monitoring, drug use and employee training. I am very familiar with each operation and the health of their animals. The proposed power line presents a very real concern to my clients in regards to the health of their animals and it is a genuine concern of mine also.

There are numerous articles investigating potential links between high voltage power lines and the associated, extremely low frequency electromagnetic fields, (ELFEF) and human diseases such as childhood leukemia. While many epidemiologic studies have been conducted, and are being conducted, no biological mechanism has yet been established to explain adverse health impacts and proximity to ELFEF's.¹ It can be argued that because no link has yet been found after decades of research, there must not be any association between ELFEF's and health. However, it can also be argued that because the controversy hasn't gone away after decades of research, and epidemiologic data still points to a link; the link just hasn't been found yet. "The International Agency for Research on Cancer labeled the low frequency electromagnetic fields into the category "2B" meaning possibly carcinogenic to humans mainly based on epidemiologic studies worldwide which indicated an increased risk of childhood leukemia without any concrete evidence from animal and cell biology studies."² More recent research has called for more inquiry into other bioactive agents¹ and it is quite conceivable that a link will be found. While it may be argued that potential human cancer links do not relate to cow health nor would cows live long enough to see any deleterious effects; there are studies that have shown other biological effects on cows in close proximity to ELFEF's.³⁻⁷ These involve membrane-anchored enzymes in the lung, leukocyte variations, estrous cycle effects, and normal lying behavior.

There are other more immediate concerns also, such as the potential for induced voltages in fences or other non-grounded objects.⁸ Cows have a lower resistance to electricity than humans. The behavioral effects of stray voltage are dependent on contact points on the cow. If there is an induced voltage in a water trough for instance, then decreased water intake would be expected which will in turn lead to decreased feed intake and then lead to other health effects. Stray voltage effects on cows are insidious and tend to predispose to other health problems.

The scientific literature raises many questions about the biologic effects of ELFEF's and while still not well understood, there are legitimate concerns. My clients have worked very hard

to train employees and to set up nutrition and management protocols to protect and build the immunity of their herds. These powerlines would be running directly over the cows placing them in immediate proximity to the ELFEF's. They do not want to expose the animals in their care to the unknown health risks of ELFEF's, or the possibility of induced voltages on objects in the cows' environment.

I believe the concerns of my clients for the health and well-being of their animals is well-founded. In my review of the literature, it appears that there are far more questions than answers in regards to the biologic effects of ELFEF's; and the potential for induced voltages, though minimal, is still a possibility.

The animals in my clients' care are the source of their, and their employees' livelihood; but they are much more than that. My clients feel a deep responsibility to care for their animals because they believe it is their moral obligation to provide for the health and well-being of those animals. We strongly urge you to consider the alternate route for these power lines.

Dan Vander Stelt DVM

Hermiston, OR

¹**Powerline bioactivity - more than magnetism**, Sidaway GH; Springerplus. 2013 Sep 11;2:454.

²**Effects of electromagnetic fields on health**, Saito T.; Nihon Rinsho. 2008 Sep;66(9):1827-36

³**Extremely low-frequency electromagnetic fields affect lipid-linked carbonic anhydrase**. Ravera S, Pepe IM, Calzia D, Morelli A, Panfoli I; Electromagn Biol Med. 2011 Jun;30(2):67-73

⁴**Extremely low-frequency electromagnetic fields disrupt magnetic alignment of ruminants**. Burda H, Begall S, Cervený J, Neef J, Nemeč P; Proc Natl Acad Sci U S A. 2009 Apr 7;106(14):5708-13

⁵**Effects of exposure to extremely low frequency electro-magnetic fields on circadian rhythms and distribution of some leukocyte differentiation antigens in dairy cows**. Stelletta C, De Nardo P, Santin F, Basso G, Michielotto B, Piccione G, Morgante M; Biomed Environ Sci. 2007 Apr;20(2):164-70

⁶**Responses of the estrous cycle in dairy cows exposed to electric and magnetic fields (60 Hz) during 8-h photoperiods**. Rodriguez M, Petitclerc D, Burchard JF, Nguyen DH, Block E, Downey BR; Anim Reprod Sci. 2003 May 15;77(1-2):11-20.

⁷**Further support for the alignment of cattle along magnetic field lines: reply to Hert et al**. Begall S, Burda H, Cervený J, Gerter O, Neef-Weisse J, Nemeč P; J Comp Physiol A Neuroethol Sens Neural Behav Physiol. 2011 Dec;197(12):1127-33.

⁸**Stray Voltage**. Wikipedia.



Memorandum

To: Sage Hollow Ranch, LLC

From: Lori Terry Gregory
Foster Pepper, PLLC

Date: July 10, 2013

Subject: Significant Environmental Impacts to Sage Hollow Ranch from Idaho Power's Proposed Boardman to Hemingway Transmission Line

I. Introduction

Idaho Power's proposed Boardman to Hemingway (B2H) transmission line project will cause significant adverse environmental impacts to Sage Hollow Ranch (the Dairy). These impacts are not capable of being sufficiently mitigated in a way that will allow the Dairy to continue to operate. The Dairy is regulated by multiple environmental statutes and regulations, as well as a Clean Water Act (CWA) Permit. Violations of the Permit subject the Dairy to lawsuits filed by regulatory agencies or citizens. Penalties of up to \$37,500 per day per violation can be imposed if liability is established. Consequently, failing to meet its environmental obligations is not an option for the Dairy.

The Dairy's ability to comply with its environmental obligations is directly tied to its ability to continually utilize *all of its land, aerially apply pesticides* to the growing crops, and *aerially seed its cover crops* in order to *ensure high-yield crops with robust root zones that can uptake all of the Dairy's nitrogen and phosphorous*. The groundwater risks are very real – particularly because the Dairy is located in an area designated by the Oregon DEQ as the Lower Umatilla Basin Groundwater Management Area (GWMA) for failing to meet the Safe Drinking Water Act standard for nitrate. The GWMA designation imposes a heightened scrutiny on the Dairy's nitrogen management practices.

As currently proposed, Idaho Power's transmission line would significantly adversely impact the Dairy by compromising *over half of the Dairy's land base and crops*, which virtually ensures that the Dairy will be unable to manage the nitrate and phosphorus as required by its CWA Permit and other environmental statutes. Exacerbating this impact is the fact that the placement of the transmission line will eliminate the Dairy's ability to aerially apply pesticides to eradicate insects that otherwise will destroy crops.

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The placement of the transmission line will also eliminate the Dairy's ability to aerial seed its winter cover crops, which is the only method whereby winter seed can be spread over corn crops growing in the field. Over-seeding gives cover crops enough time to establish a root zone ahead of the winter season so that the plants can utilize nitrogen over the winter. Without a sufficient root zone, nitrate can leach to the groundwater.

The combined impacts to land; loss of crops; and inability to aerial apply pesticides and seed cover crops will result in a significant adverse environmental impact to surface and ground water quality. These impacts expose the Dairy to unreasonable risks of liability under multiple statutes, including the CWA, the Safe Drinking Water Act, and the Resource Conservation and Recovery Act.

II. The Dairy is a Family-Owned Business that is Important to the Local Community

Sage Hollow Ranch, LLC is a family-owned dairy farm and replacement heifer ranch in Boardman, Oregon. The family bought the 1,280 acre farm property in 2006. Over the next three years, the family developed the Dairy, with facilities to milk 3,500 cows and raise 5,000 replacement heifers. The family plans to build one additional freestall barn. When the barn is completed, the family's total investment will be in excess of \$40 Million.

The dairy operates 24-hours a day, 7-days a week and employs approximately 40 people in year-round, well paying jobs. Employees are hired from the surrounding communities. The annual gross revenue of the Dairy exceeds \$12 Million. Because the Dairy purchases almost all of its feed and services locally, a conservative estimate of the Dairy's revenue contribution to the local community is approximately \$100 Million.

III. Adverse Environmental Impacts to the Dairy Associated with the Proposed Transmission Line

A. The Proposed Transmission Line Adversely Impacts the Dairy's Ability to Comply with its CWA Permit

The Dairy is permitted under the NPDES CAFO Permit issued by the Oregon DEQ under the federal and state Clean Water Acts. That Permit regulates the dairy as a concentrated animal feeding operation (CAFO) and contains detailed, prescriptive requirements, all of which are imposed to avoid impacts from the Dairy's operation to surface or groundwater. The Permit's commitment to ensure the protection of surface and groundwater is manifested in the

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requirement to obtain the Permit even if the Dairy does not discharge. In other words, simply by virtue of the fact that the Dairy is a CAFO, it is required to obtain this Permit.

The cornerstone of the Permit is the requirement to operate in compliance with an Oregon DEQ approved Animal Waste Management Plan (AWMP). The AWMP is the plan that shows how the Dairy prevents impacts to surface and groundwater. To do this, the Plan must demonstrate that it has sufficient land to grow high-yield crops that can utilize the nitrogen and phosphorous contained in the Dairy's manure. The AWMP is incorporated by reference into the Permit, which means that a failure to comply with the Plan constitutes a violation of the Permit. Violations of the Permit are enforceable by EPA, Oregon DEQ, or third party lawsuits. If liability is established for violations, the CWA authorizes penalties of up to \$37,500 per day, per violation, and allows for the recovery of attorneys' fees and costs.

The AWMP includes very specific information about the land base; type of crops; expected yields; volume of liquid and solid manure; and amount of nitrogen and phosphorous generated by the Dairy. All of this information is then used in a formula to develop a nitrogen and phosphorous budget to show how the Dairy will avoid impacts to surface and groundwater quality. Failing to have sufficient land or sufficient crops to uptake the nitrogen and phosphorous is a Permit violation.

The Dairy applies its manure to its land as fertilizer so the Dairy can grow crops year round, including a cover crop in the winter. If the crops do not grow and uptake the nitrogen and phosphorous, those pollutants can leach to groundwater or flow overland to surface water. To grow cover crops in the winter, the crop must be aerially seeded over the existing corn crop in the field to give the cover crop enough time to establish a sufficient root system ahead of the winter season. This practice is critically important to the environment because the established root zone allows the cover crop to uptake nitrogen in the winter months and thereby avoids leaching nitrogen to the groundwater.

The proposed project will compromise over 50% of Dairy's land by restricting the ability of the Dairy to effectively irrigate its land through the use of its irrigation lines and pivot system and by placing utility poles in the land itself. Because the Dairy needs *all of the land* owned by the Dairy to comply with the nitrogen and phosphorous budget, this creates a significant environmental impact to the Dairy's operation. There is no substitute for the land base on the Dairy because the Dairy has installed infrastructure in its fields to allow it to pump and apply the animal waste generated by the Dairy *to that land*.

There is no nearby land available upon which to apply the Dairy's manure and, even if there were, using that land would require the Dairy to truck solid and liquid manure to another location, which creates further adverse environment impacts associated with increased air

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emissions; increased use of fossil fuels, thereby increasing the Dairy's carbon footprint; and risks of environmental spills from the trucking operation. The environmental impact of increasing the carbon footprint of the Dairy to transport animal waste is in direct conflict with the State of Oregon's commitments to address climate change through reduced greenhouse gas emissions. Increased use of fossil fuels through increased transportation only serves to increase the Dairy's carbon footprint. Moreover, transaction costs of transporting the animal waste off-site would be significant. Finally, there is no assurance that Oregon DEQ would permit the application of animal waste to other land because of the GWMA designation.

The impact from the compromised ability to farm the land is magnified because proposed transmission line will eliminate the ability of the Dairy to aerially spray pesticides or aerially seed crops, which will reduce the crop yield, thereby creating yet additional risks to surface and groundwater by eliminating or reducing crops that would otherwise be available to utilize the nitrogen and phosphorous from the Dairy. Aerial application of pesticides is crucial because a tree farm, located on several sides of the Dairy farm land, hosts insects that are harmful to the Dairy's crops. Spider mites and beetles are of particular concern to the Dairy because of the damage these insects can do to crops if not effectively eradicated. Failure to completely eradicate these pests can result in catastrophic loss of crops. Research has shown that these pests can reduce corn silage by 40%. Complete eradication of pests is crucial because partial eradication often causes pesticide resistance, causing even more crop loss and the need for more pesticide application.

The Dairy has developed a successful, environmentally responsible, and sustainable business that effectively and efficiently uses the nitrogen and phosphorous from manure as a fertilizer to grow crops, which are fed to its cows, which produce milk for the local community. The proposed transmission line project will result in significant adverse environmental impacts to ground and surface water that are incapable of mitigation because the Dairy cannot operate without the use of all of its land and all of its crops.

B. The Transmission Line Adversely Impacts the Dairy by Exposing it to Risk of Liability Under the Safe Drinking Water Act (SDWA).

The risks to groundwater from the proposed project discussed above also create risk of liability to the Dairy under the SDWA (42 U.S.C. § 300(i)). The Environmental Protection Agency recently invoked its authority under this statute against four dairies in Yakima Valley, Washington, which ultimately resulted in an Administrative Order on Consent based on an area that exceed the maximum contaminant level for nitrate. *In the Matter of: Yakima Valley Dairies*, Docket No. SDWA-10-2013-0080 (U.S. EPA, Region 10).

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The Administrative Order imposes extensive, expensive obligations on the dairies to provide alternate sources of drinking water to residences; install dozens of monitoring wells and monitor those wells; and implement actions designed to further study and address the sources of the groundwater contamination.

EPA's enforcement action confirms exposure to liability under the SDWA for any dairy operating in areas with nitrate concentrations that exceed the SDWA standard. Sage Hollow operates in such an area and, therefore, is reasonably concerned about its exposure to liability under the SDWA, which will be triggered because of the significant environmental impacts associated with Idaho Power's proposed project.

C. The Transmission Line Adversely Impacts the Dairy by Exposing it to Risk of Liability Under the Resource Conservation and Recovery Act (RCRA).

The risks to ground and surface water from the proposed project discussed above also expose the Dairy to an agency or citizen-suit enforcement under the RCRA, which is the federal statute that governs the treatment, storage, and disposal of solid and hazardous waste. 42 U.S.C. § 6971(a)(1)(B). Earlier this year, several environmental groups sued five dairies in the Yakima Valley for alleged violations of RCRA based on alleged groundwater contamination from the dairies. The plaintiffs seek to shut down most of operations on those dairies; sequester ground and surface water and require treatment; require cleanup the contamination; require the dairies to fund independent studies; and pay the plaintiffs' attorneys' fees and litigation costs.

The federal court recently denied the dairies' motion to dismiss and has allowed the case to proceed to trial. *Community Association for Restoration of the Environment, et al., v. George DeRuyer & Son Dairy, LLC*, 13-CV-3017-TOR (Order Denying Defendants' Motion to Dismiss, ECF No. 59, 06/21/13). For the same reasons as set forth above, Idaho Power's proposed project's significant environmental impacts expose the Dairy to an unreasonable risk of liability under RCRA.

IV. The Impacts Cannot be Adequately Mitigated

There is no adequate mitigation to remedy the environmental impacts to the Dairy from the proposed project. The compromised ability to farm over half of the Dairy's land and crops cannot be remedied by other land because the Dairy has already built infrastructure that allows it to store, pipe, pump, and apply its dairy waste to its land. There is no other land available that allows the Dairy to continue to use that infrastructure. The only alternative land is located miles away and would require the Dairy to truck its waste which creates additional significant environmental impacts discussed above.

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There is no ability to mitigate for the loss of the winter cover crop that must be aeri ally seeded. And, there is no alternative to aerial application of pesticides in light of the critical importance of effectively eradicating the pests to avoid a 30-40% loss of crops.

V. Conclusion

The proposed B2H Transmission Line Project will cause significant environmental impacts to Sage Hollow Ranch, LLC. The compromised ability of the Dairy to farm *all of its land* to grow *high yield crops* is the *critical path* component for the Dairy's compliance with its environmental obligations. The impacts to the land and crops create significant environmental impacts to ground and surface water and exposes the Dairy to significant liability under multiple statutes.

Unlike most businesses, the Dairy must operate 24-hours a day, 7-days a week. The Dairy cannot continue to milk cows or raise heifers without generating manure. The Dairy cannot generate manure without being able to use all of its land to grow high-yield crops throughout the year as specified in its CWA Permit and AWMP. To raise high-yield crops throughout the year, the Dairy must be able to aeri ally apply pesticides consistent with aviation regulations concerning low level aerial spraying. Higher level spraying, even if possible, would lead to excessive drift. Aerial seeding is also necessary to seed cover crops. Both of these practices will be eliminated under Idaho Power's proposal.

Idaho Power has other, more reasonable alternatives that will avoid these significant environmental impacts to the Dairy. Those alternatives should be pursued instead of the current proposal that is being advanced by Idaho Power.