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From: Craig Reeder <creeder@hale-co.com>
Sent: Thursday, March 19, 2015 10:13 AM
To: tgertsch@blm.gov; comment@boardmantohemingway.com
Subject: Boardman to Hemmingway DEIS Comments
Attachments: Hale Farms B2H Comments.pdf

Ms. Gertsch:

Attached please find comments from Hale Farms regarding the Draft EIS for the Idaho Power Boardman to Hemingway Project.

If you need additional information or have question, my contact information is provided below.

Thank you,

Craig Reeder

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March 18, 201

Ms. Tamara Gertsch
BLM National Project Manager
Bureau of Land Management
100 Oregon Street
Vale, OR 97918
tgertsch@blm.gov

RE: Boardman to Hemingway (“B2H”) Transmission Line Project (“B2H Project”) - Comments on the DEIS- Destruction of Oregon Farmland

We write to submit our comments in regards to the B2H Project and in opposition to the Agency Preferred Alternative (i.e. Longhorn Variation) and the Longhorn Alternative. Hale Farms owns and leases land on and near Bombing Range Road. We operate a nearly 4 mile border with Bombing Range Road (on the east side of the road) that includes 7 pivot irrigated fields and farmable “corners” that would be severely impacted by the proposed routes and cumulative impacts of the multiple proposed projects. In light of glaring deficiencies in the EIS process; adverse effects of the project on unique, unreplaceable, irrigated farmland; and the Bureau of Land Management’s (BLM’s) failure to consider routing alternatives that would largely avoid impacting high-value irrigated farmland, Hale Farms respectfully submits the following comments:

1) Due to Lack of Proper Notification and Insufficient Time, the DEIS Comment Period Should Be Extended by 60 Days

The current Agency Preferred Alternative (the Longhorn Variation) was eliminated from consideration in June 2010. Although we and other local landowners remained active in the B2H Project’s scoping and commenting period, we were not made aware of the Longhorn Variation and possible negative impacts on [Name of Farm or Land] until this year, giving us very little time to familiarize ourselves with this project and submit comments.

In light of BLM’s eleventh-hour selection of the Longhorn Variation as the Preferred Alternative, local landowners who have been involved with this process for years are scrambling to meet the March 19th deadline. Because 90 days is an unreasonable time to review, understand, and react to the drastic route changes the B2H Project continues to make, a 60-day extension on the comment period is a reasonable request given the size and scope of the consequences of this transmission line. Additional time to submit comments will allow Hale Farms, as well as other interested and impacted parties, to further assess the facts and circumstances surrounding the B2H Project and provide relevant input into the determinations involved in the B2H Project.

2) **The DEIS Drastically Underestimates the Effects of the B2H Project on Surrounding Agricultural Land**

The DEIS is unclear about the impact of the B2H Project on prime, irrigated farmland and appears to gloss over the dire economic losses on local farmers. The DEIS contains numerous inconsistencies regarding affected agricultural land and requires clarification. *See, e.g.*, DEIS § 3.2.6.6 at 3-438, *ll.* 29-30.

The Columbia-Snake River Irrigators Association (CSRIA) estimates that impacts to irrigated farmland during both construction and operations will be substantial -- in the range of 350 to 1,050 acres. Technical Memorandum from Darryll Olsen, CSRIA, to Tamara Gertsch, BLM at 3 (Mar. 17, 2015). The CSRIA, through a technical expert, recently estimated that the fair market value of irrigated farmland in the region is \$7,500 - \$10,000 per acre. *Id.* Thus, the total value of impacted irrigated agriculture would be approximately \$2.6 million to \$10.5 million, and the estimated present value of associated regional income loss would be about \$12.5 million to \$17.4 million. *Id.* at 4. The DEIS improperly characterizes these economic impacts as “low,” when nothing could be further from the truth. *See* DEIS § 3.2.6.6 at 3-439, *ll.* 11-13. It is also important to note that the land near Bombing Range Road is some of the highest quality land in the entire Columbia Basin. It has an ideal soil type, unmatched proximity to processing customers, low-cost water, premier water supply, and flat topography. Given its proximity to water sources, the unavailability of other ground due to restrictions on bare ground created by items such as conservation areas and the bombing range, this land is NOT replaceable.

The DEIS is also misleading because it claims that the Longhorn Variation and Longhorn Alternative will impact less prime farmland than the Proposed Action. This is inaccurate because the DEIS’s acreage figures mistakenly focus on so-called “prime” farmland that theoretically *could* be farmed rather than actual irrigated farmland that is currently in use. BLM’s reliance on theoretical farmland suggests a mistaken belief that irrigated farmland can simply be replaced. However, this is not the case, as irrigated farming is highly dependent on soils, geography, water deliver, and irrigation conditions – lost farmland cannot merely be moved to or recovered in other locales. Given the unique circumstances required for irrigated farming, BLM’s concession in the DEIS that the Proposed Action will disturb 32 *more* acres of irrigated agriculture than the Proposed Action directly contradicts its claim that the Longhorn Variation will impose less harm on agriculture land than the Proposed Action. *See DEIS* at 3-438, *ll.* 29-30. Indeed, the Longhorn Variation and Longhorn Alternative will impose greater harm on irrigated farming than any of the other alternatives.

3) **The DEIS’ Cumulative Impact Analysis is Deficient**

As BLM is aware, activity for wind and other energy projects in Morrow and nearby counties remains high. The B2H Project presents a continuing threat to surrounding farmland because it potentially creates a transmission line corridor straight through productive irrigated farmland. This is a particular concern because Oregon law provides that one of the factors in evaluating whether a project should be granted an exception to allow siting in areas designated for exclusive farm use is whether the project uses an existing right of way. *See* ORS 215.275. Thus, there is a high likelihood that this corridor will continue to expand and in turn consume additional farmland to meet increasing demands for transmission capacity.

In light of the above, the DEIS’s cumulative impact analysis is deficient because it fails to address the cumulative impact of the B2H Project when considered in conjunction with the various wind energy projects proposed in the region. For instance, the DEIS omits discussion of the proposed 500 MW

Wheatridge Wind Energy Facility, which has provided notice that it may connect to the grid through the Longhorn Variation corridor. The Wheatridge project should have been included and was inexplicably absent from the DEIS. Moreover, we understand that additional energy projects, including Perennial Windchaser and Ella Butte, could potentially utilize the transmission corridor created by the Longhorn Variation based on their location. Together, these projects generate an influx of power and create a risk of further cumulative impacts to irrigated farmland along the transmission corridor. We urge BLM to consider these impacts in detail and carefully weigh the severe effects on nearby farmland in light of other feasible routes such as the Slatt Alternative as described below.

4) The Original, Southerly Route or the Slatt Alternative Should Be Considered for the B2H Project and the Longhorn Variation and Longhorn Alternative Should Be Removed from Consideration.

The original Proposed Action, the Southerly Route, was wisely chosen by Idaho Power because of its minimal impact on Oregon farmland and was presented to the local community as the preferred route from 2010 through 2014. The Southerly Route would connect through the proposed Grasslands Substation. Similar to the Southerly Route is the Slatt Alternative, which would follow the Southerly Route before turning west and terminating at the existing Slatt substation, which is the major 500-kV interconnection hub serving the northeastern Oregon Region. The last-second deviation to the Bombing Range Road route is a surprising and concerning development for several reasons, outlined below.

- The Slatt substation is already built and suitable for wind farms. The Longhorn substation to the north has yet to be built and will meet strong resistance from the local community.
- The Southerly Route and the Slatt Alternative have minimal impact on the local agricultural community. That route will be met with little public, environmental and political resistance.
- The Longhorn Routes condemn prime farmland and will be much more expensive than the Southerly Route or the Slatt Alternative. Irrigation pivots cannot be used near the transmission lines, and once a crop circle is shortened, the entire farm is compromised. In connection with a condemnation action, each pivot circle area impacted would need to be purchased in its entirety from the property owner.
- The Southerly Route or the Slatt Alternative would prevent environmental and federal issues. Idaho Power's newly favored Bombing Range Road route will result in a negative impact on an endangered species that has been documented previously.

We welcome any opportunity to discuss our comments with you – please feel welcome to contact me with any questions you may have at the contact information provided on the letterhead.

Sincerely,



Craig Reeder
Hale Farms