

Don Rice

Director, North American Operations

GreenWood Resources

77200 Poleline Road

Boardman, OR 97818

541-667-9220 Office

From: Don Rice

Sent: Thursday, March 19, 2015 9:37 AM

To: 'comment@boardmantohemmingway.com'

Subject: B2H DEIS Comments - Boardman Tree Farm

Please accept these comments.

Don Rice

Director, North American Operations

GreenWood Resources

77200 Poleline Road

Boardman, OR 97818

541-667-9220 Office



P.O. Box 870
Hermiston, Oregon
Telephone: 541-667-9220
Fax: 541-481-2518

March 19, 2015

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**

I write to submit comments in regards to the B2H Project and in opposition to the Agency Preferred Alternative (i.e. Longhorn Variation) and the Longhorn Alternative. I submit these comments for the Boardman Tree Farm. Our farm would be permanently directly and negatively impacted by the Longhorn Alternatives. In light of deficiencies in the EIS process; adverse effects of the project on unique, 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, The Boardman Tree Farm respectfully submits the following comments:

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

The DEIS is incorrect 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 DEIS improperly characterizes these economic impacts as “low”. *See* DEIS § 3.2.6.6 at 3-439, *ll.* 11-13. A transmission line through the tree farm would permanently prevent the growing of trees in the easement area.

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. Indeed, the Longhorn Variation and Longhorn Alternative will impose greater harm on irrigated farming than any of the other alternatives.

2) 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 proposed location of the Longhorn substation results in projects like B2H presenting a continuing threat to surrounding farmland because it creates a need for transmission line corridors straight through productive irrigated farmland. 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.

3) 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. 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 Slatt substation is already built. The Longhorn substation to the north has yet to be built.
- The Southerly Slatt Alternative have minimal impact on the local agricultural community.
- The Longhorn Routes condemn prime farmland and will be much more expensive than the Southerly Slatt Alternative.

- The Southerly Slatt Alternative would prevent environmental and federal issues.

I welcome any opportunity to discuss our comments with you – please feel welcome to contact me with any questions you may have.

Best Regards,

GREENWOOD RESOURCES, INC.

Don Rice

Don Rice
Director North American Operations