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**From:** lois barry <loisbarry31@gmail.com>  
**Sent:** Thursday, March 19, 2015 12:24 PM  
**To:** comment@boardmantohemingway.com  
**Subject:** NO ACTION on B2H Transmission Line

Bureau of Land Management

19 March 2015

PO Box 655

Vale, OR 97918

Re: B2H Project

I urge the Bureau to adopt the NO ACTION ALTERNATIVE for the Boardman to Hemingway Transmission Line Project.

From studying available BLM documents, I've learned that this project was being considered as early as 2002. In a review of the documents published since then, I see no reference to the dramatic changes in alternative energy sources, nor have I seen anywhere a cost/benefit analysis of conservation programs versus construction of the transmission line. I can't envision a bank or investment fund in America funding this project. The DEIS, 3,000 pages, is entirely "process" oriented, with minimal rationale for the proposed expenditure of funds and disruption of habitat, view sheds and the lives of those who live in proximity to the proposed transmission lines.

Of the proposed 306 miles of line, 282 miles are in Oregon, all of this to allow "excess hydropower and wind energy to flow" to Idaho. Oregon snow packs are far below normal this year; excess hydropower is dubious, and building hundreds of miles of transmission lines seems an extreme solution to the Oregon Legislature's mistakenly generous tax subsidies for wind tower farms.

On the other hand, in 1999 the Oregon Legislature wisely supported the formation of Energy Trust of Oregon. A 3% public service charge on selected utilities' consumer bills has supported notable conservation measures and significant use of alternative energies:

As part of its oversight of Energy Trust, the OPUC adopted performance measures against which to benchmark Energy Trust's performance. [OPUC performance measures](#) are typically updated annually.

- Electric efficiency. Save at least 32 average [megawatts](#), aMW, of electricity at a levelized cost of no more than 3.2 cents per kilowatt hour in PGE territory; save at least 17.1 aMW of electricity at a levelized cost of no more than 3.7 cents per kilowatt hour in Pacific Power-Oregon territory.

- Gas efficiency. Save at least 4.53 million annual **therms** of natural gas at a levelized cost of no more than 45.3 cents per therm in NW Natural-Oregon territory; and save at least 0.40 million annual therms of natural gas at a levelized cost of not more than 52 cents per therm in Cascade Natural Gas territory.
- Renewable resource development. Report annually on project and market development assistance provided, including the number of projects supported, milestones met and documentation of results from a market and technology perspective. Obtain at least 0.7 aMW in installed generation of net-metered standard projects, including solar and small wind. For non-solar custom projects, the three-year rolling average incentive is not to exceed \$29/allocated MWh. Report sources of funding and the selection criteria for innovative and custom solar projects.

It was not until April, 2013 that Idaho Gov. Butch Otter announced the formation of an Energy Efficiency Institute. Because Idaho has been predictably short-sighted in its support of consumption over conservation, there is no reason for residents of Oregon to tolerate the intrusion of 200' transmission lines, especially when the power transmitted will most likely be supporting the industrial production of potatoes (which tests show now qualify as pesticides) and cattle (an inefficient and environmentally destructive source of protein). By 2020 one can hope that agriculture in Idaho may be dramatically different. Where are Idaho's subsidies for solar? Wind energy? Energy-efficient construction? There is no reference to energy-conserving smart-grids or using locally sourced solar power distributed by micro-grids.

Idaho Power and the BLM are using 20<sup>th</sup> century planning and ignoring 21<sup>st</sup> century realities.

I have worked for the U.S. government, and I am well aware that if there is a planning agency, plans will be created. If there is not a conservation agency, conservation will not occur. All of the B2H documents emphasize planning and process. I am also aware that by publishing maps and asking citizens to respond to the proposed route of the transmission lines, the BLM has adeptly focused attention on where the lines should go, rather than on the major question of whether they should be constructed at all.

- **The 500-kilovolt B2H line has been delayed repeatedly and is now expected to be energized no sooner than 2018 and likely closer to 2020 or beyond. If it is delayed much further, Idaho Power says it will consider other options, such as new power plants, to fill the need.** . [n.b. again, there is no mention of conservation.]

Yes, I concur with Idaho Power. They should consider other options. The NO ACTION ALTERNATIVE is the only defensible choice.

In reference to Segment 2, Blue Mountains region: I know that many of my neighbors are responding in detail to the specific siting proposal of transmission lines on Glass Hill Road and close to Morgan Lake. I concur with all of their comments, and would add that the Morgan Lake Road is a 17% grade dirt road, two miles long, with two blind curves, used by approximately 35 local families and hundreds of visitors to Morgan Lake. Using that road to move heavy equipment would be disruptive and could be disastrous.

Yours very truly,

Lois Barry

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