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From: Gail C <mcgcarb@bendbroadband.com>
Sent: Monday, January 26, 2015 11:20 AM
To: comment@boardmantoemingway.com
Cc: Jennifer Theisen: BLM
Subject: Boardman to Hemingway Transmission Line Project Draft EIS
Attachments: B2H Draft EIS Comments rev 1-26-2015.docx

Tamara Gertsch
BLM National Project Manager
Vale, Oregon

Attached is my response to the DEIS.

Thank you
Gail Carbiener



A handwritten signature in cursive script, reading "Gail Carbiener", is enclosed in a simple rectangular border. The signature is positioned in the upper left quadrant of the page.

January 26, 2015

Gail Carbiener
19506 Pond Meadow Avenue
Bend, OT 97702

Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, OR 97918

Via email: comment@boardmantohemingway.com

Re: Boardman to Hemingway Draft EIS Comments

1.2.1 BLM: Agencies Purpose and Need

I do not question the authority of the BLM to respond to IPC's application for a right-of-way across public lands. I understand the BLM's need to grant, grant with modifications, or deny IPC's application for use of BLM-managed public lands to construct, operate, and maintain the B2H Project.

However none of these regulations state that the BLM must accept B2H as the only action in which to comply based upon the need of Idaho Power.

This DEIS is based upon data developed in 2011 and before. Common sense requires the BLM to question Idaho Power if economic, financial and electric power needs have changed in these four plus years. Certainly Idaho Power (IPC) partners have had significant construction and planning changes. Bonneville Power and Portland General have cancelled Cascade-Crossing Transmission project a line to Grassland substation. PacifiCorp has cancelled their contract with Bonneville Power effective 2016. The cancelled Mountain States Transmission Intertie (MSTI) was a proposed 500kV AC transmission power line starting 5 miles south of Townsend, Montana and terminating northeast of Jerome, Idaho.

In 1.2.1 starting at line 1, you state; In accordance with Sections 103(c), 202(c)(1), and 302(a) of the Federal Land Policy and Management Act of 1976 (FLPMA, 43 United States Code [U.S.C.] 1701 et seq.), as amended, public lands and resources under the BLM's stewardship are to be managed in accordance with the principles of multiple use and sustained yield that take into account the long-term needs of future generations for renewable and nonrenewable resources. Nowhere does it say that the BLM is **required** to issue the ROW permit.

The BLM and its consultants must determine if the need continues to exist to issue a permit for the ROW to Idaho Power based upon regional changes.

1.3.6 Bonneville Power Administration has yet to decide if they will participate in the project. Has the BLM determined if Idaho Power can perform financially if BPA decides not to participate? What alternatives has IPC identified if BPA decides not to participate?

1.4 Idaho Power Company's Objective for the Project:

Bonneville Power has not yet decided to build the Longhorn Substation, the BLM preferred northern terminus, and Portland General has cancelled the Cascade-Crossing project which would have had the Grassland Substation as its terminus. Has the BLM or IPC determined if the Grassland Substation will still be available, and have capacity, with the cancellation of Cascade-Crossing and current MOUs between Bonneville Power, Portland General Electric and PacifiCorp? These agreements all expire on December 31, 2014, it is now 2015, has the BLM determined current status going forward?

1.4 line 26: Since the B2H project is neither required to support any particular new generation project nor justified by any particular existing generation project, the BLM should delay issuing the ROW permit until firm project commitments are in place.

With PacifiCorp willing to pay 54% or \$26.33 million of the **permitting costs** and BPA committed to \$11.7 million or 24.24% leaving Idaho Power committing 21.21% or \$10.23 million of a total cost of approximately \$48 million, seems like the wrong power firm is applying for the ROW.

1.4 line 6: We know that these three points are out of date. The 2013 Integrated Resource Plan and the initial committee work on the 2015 IRP continue to show that Idaho Power does not need the B2H for energy requirements. The 2013 IPC Integrated Resource Plan for Sales and Load Forecast quotes; "The 2013 IRP average system load forecast is lower than the 2011 IRP average system load forecast in all years of the forecasted period."

"Economic recovery is occurring at a slower pace than was forecasted in the 2011 IRP. As a result, most of the economic variables used in the 2013 IRP forecast were lowered and improvement in economic conditions has been delayed in the 2013 load forecast."

The BLM should not ignore this data.

1.4.1 and 1.4.2: Both Federal Energy Regulatory Commission and Idaho and Oregon Public Utility Commissions have requirements for providing customers with adequate, safe and reliable electric service while planning for the future. There are no fixed deadlines and since B2H has been considered since 2000 BLM certainly can require Idaho Power to present other alternatives.

In Summary, Agencies Purpose and Need: The BLM has made no effort to require Idaho Power to present other alternatives to the B2H, instead relies upon out dated data and Federal and State regulations that have no firm deadlines. B2H has been planning since 2000 that is 15 years!

The BLM should decline this request for ROW and return to Idaho Power for a new proposal.

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