

February 19, 2015

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

Via email: comment@boardmantohemingway.com

Re: Boardman to Hemningway Draft EIS Comments

Please accept these additional comments to the Draft EIS for the B2H Transmission Line project.

2.3 The BLM does not evaluate a reasonable range of alternatives in the DEIS. In reality the public is given many pages of really one route with a few close by short route alternatives.

40 CFR 1502.14 states clearly it is the heart of the environmental impact statement. *“Based on the information and analysis presented in the sections on the Affected Environment (§ 1502.15) and the Environmental Consequences (§ 1502.16), it should present the environmental impacts of the proposal and the alternatives in **comparative form, thus sharply defining the issues** and providing a clear basis for choice among options by the decision maker and the public.”* [Emphasis added]

Alternatives considered but eliminated were not presented in any detail, certainly not in comparative form. The BLM simply stated that they were technically not feasible, similar to proposal, did not meet purpose, not economic, or ineffective.

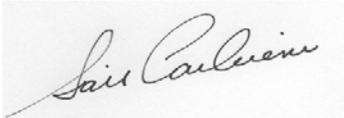
The BLM has not met NEPA requirements to evaluate a reasonable range of alternatives. Idaho Power has made the decision rather than the BLM.

3.1.2.2 The BLM has employed consultants to evaluate the amount and locations of ground-disturbing activity associated with the B2H Project based on the descriptions of project construction, operations, and maintenance activities in IPC’s November 2011 Revised Plan of Development, and they determined the types, duration and intensities of impacts that could occur on the land.

Of course this has been done based upon the BLM preferred route. No evaluations were done to determine effects based upon possible alternatives that the public has not had a chance to compare. In addition, the final requirements will be built into the IPC Plan of Development, not yet knowing if requirements are possible.

At the very least the BLM should prepare a Supplemental EIS based upon significant new impacts that have not have been evaluated. 23 CFR 771.130 (a)(2): States a Draft EIS may be supplemented at any time..... whenever new information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.

Thank you;



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