

comment@boardmantohemingway.com

From: Fuji Kreider CBD <fkreider@campblackdog.org>
Sent: Thursday, March 19, 2015 5:58 PM
To: comment@boardmantohemingway.com
Subject: Kreider--Comment: Boardman to Hemingway Transmission Line Project
Attachments: DEIS Comments-Kreider-3-18-2015.docx

BLM officials,

Please accept the attached public comment on the Draft Environmental Impact Statement for the Boardman to Hemingway Transmission Line Project.

Thank you for your time and consideration.

Sincerely,

C. Fuji and Jim Kreider
60366 Marvin Rd.
La Grande, Oregon 97850

March 18, 2015

To: Boardman to Hemingway Transmission Line Project
 P.O. Box 655
 Vale, Oregon 97918
comment@boardmantohemingway.com

From: Jim and C. Fuji Kreider
 60366 Marvin Road
 La Grande, Oregon 97850
fkreider@campblackdog.org
jkreider@campblackdog.org

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) addressing Idaho Power's proposed Boardman to Hemingway Transmission Line Project. We are Union County property owners and residents living in the vicinity of Morgan Lake (Segment 2 Blue Mountains (aka Segment 9 and 9A).) We will provide specific comments to the Proposed and the Alternative routes below; however, our primary concern with the DEIS is the lack of attention to the "No Action Alternative." We should state clearly and up-front, this is our preferred option and we urge the BLM to adopt the **"NO ACTION ALTERNATIVE"** in the Final EIS and Record of Decision.

The DEIS gives disappointing and cursory attention to this option. In fact, it has really NOT been "studied." The No Action Alternative, per NEPA and stated in the DEIS, is to describe the "existing and future" effects on the environment... Project need and socio-economic conditions are part of that equation. We do not see adequate analysis given to the future need of the project. Since project inception in 2007, no one can deny that changes have occurred with energy distribution networks; increasing reliance on local energy sources (instead of the national grid); and governments' incentives to help incubate these technologies. If this project were approved to move forward, many more years will pass, and the technological advancements will be that much more robust. Hence, more study needs to be done to determine if the NO Action Alternative is a (more) sound and viable choice for our future.

Related to the technological advancements in power generation and distribution are the financial costs - and opportunities. For Idaho Power and its investors, the question to be studied is what will be the long term return on investment? Most investment analysts would say to get out of commercial utilities and invest in newer technologies. Even David Crane, the CEO of NRG the largest power generator in the country, believes that the power grid we have is obsolete, and that high-tension lines are no longer needed. Why would Idaho Power Company make such short-sighted investments?

Newer technologies would create local, sustainable jobs, rather than temporary work for construction of towers and roads; and, reduce or eliminate the ecological impacts apparent when reading the DEIS. Costs and opportunities need better comparison than the DEIS presents. Costs that will be avoided with the No Action Alternative should be studied. These include not only avoiding the project costs from road building, land clearings, equipment and materials necessary, but also:

- avoiding the bureaucratic ripples (costs) for changing all the land use and various management and mitigation plans that the mire of agencies effected must deal with;
- avoiding the cost of mitigating the degradation of natural habitats (if that mitigation is possible);
- avoiding private lands compensatory mitigations and the subsequent lawsuits that inevitably seem to occur with projects like this;
- avoiding the 'cultural and community costs' that are intrinsic when neighbors become polarized over compensation, routing or other actions. These are difficult to measure but certainly will exist (and they are growing already); and
- avoiding the future cost of removal of towers and lines once they finally become obsolete (assuming they would be required to decommission and remove infrastructures as part of their permits), to mention a few.

Opportunities to be studied in the No Action Alternative should include employment, energy conservation and energy yield projections in meeting the future energy needs of the region(s). Please study the jobs and economic impacts (“homegrown prosperity”) that distributed generation and storage will create. What changes and options to the business models of utilities are being forecasted as energy needs change into the long-term future?

We have also been told that much of the power to be sent to Idaho will be for irrigation. In the report we see no consideration given to the lack of water that will be available. As of this writing 2 counties in Oregon have declared drought. While much of this water will come from the Snake River that water may not be available in the future due to radioactive contamination from Idaho National Engineering Laboratory (INEL). Studies have indicated trace amounts of radiation at American Falls which flows into the Snake River. Other studies have indicated that a plume of radioactive water is approaching the Columbia River at the Hanford Nuclear Reservation. We do not have the resources to review these studies ourselves; but we believe that this issue needs to come into play in your research as it will reduce the desire for irrigation from these sources and thus making the No Action more viable.

Without studying these “potential futures,” the No Action Alternative is just words without serious study of this option. We do not believe that is the intention of NEPA’s requirement for including a No Action in any EIS.

Our remaining comments are specific to the **Proposed and Alternative routes for Segment 2, Blue Mountains.**

Visual:

The DEIS executive summary states, “after construction, the presence of large transmission towers would potentially introduce long-term impacts on visual resources.” Evidently, these visual impacts are significant enough to force changes in the proposed route over the past eight years or so. For example, the Glass Hill Alternative route, located further west from the Proposed route, was chosen to avoid visual impact from La Grande (p. 2-57); to avoid the Oregon Trail; and to avoid degrading the viewshed from Morgan Lake, “Union County’s #1” in the Chamber of Commerce’s top 10 places to see in Union County.

One consequence of this decision is that extremely valuable and irreplaceable wildlife habitat will be degraded, in order to spare ourselves the view. That said, we support Idaho Power’s efforts to avoid degrading the viewshed from this park; hence, we believe that consideration of burying the transmission line in certain key locations needs more consideration. And, while at face value burying may seem a viable compromise, there will be impacts with burying the line as well (e.g.: noxious weeds, habitat effects and more.) Therefore, line burial needs to be considered in the EIS. It appears that “due to costs” it is missing—at least according to our discussions with staff at the BLM sponsored Open House in La Grande in January 2015. Yet we know that exceptions have been made in other locations, such as in the Arizona desert.

Another option not fully discussed in the DEIS would be alternatives to the traditional (steel lattice, H-frame) transmission line towers. Today there is another option - monopole structures that are fabricated out of self-weathering steel that is treated to produce a rust-like finish. These monopoles have been used extensively in the southwest where they blend in well to the expansive viewscapes/viewsheds.

In conclusion, given the various options, in the context of viewshed, we believe that the Glass Hill Alternative with buried or monopole towers should be given further attention in the EIS.

Wildlife:

Table S-3 lists Residual Effects on Wildlife. Impacts to virtually all wildlife groups are rated as Moderate to High, both for initial and residual impact. Our concerns are: mortality (e.g. bird strikes), noise disturbance, human presence, disruption of breeding and foraging behavior, habitat loss and modification, fragmentation and loss of connectivity.

Building new roads are our biggest concern to habitat fragmentation and introduction of human presence. Living in the Morgan Lake/Glass Hill area we have experienced the increase in human activity and fugitive dust. If this project is approved to move forward, we would request that helicopters be used in tower construction to minimize terrestrial habitat disturbance and dust.

Wildlife: Migratory birds and raptors

Another reason for the Glass Hill Alternative (DEIS p 2-57) is to address concerns about the Proposed Action's proximity to Ladd Marsh Wildlife Management Area. While this is a good alternative for Ladd Marsh, it appears to also be good for the Bald Eagle nest near Twin Lake/Morgan Lake. However, we are not sure about the Osprey nest in Sheep Creek. Transmission lines and birds don't mix well. Hence, the No Action Alternative or burying the line is preferred.

Wildlife: Big game

The Rocky Mountain Elk population in this area warrant exceptional consideration! While they are not an endangered species the size of this intact herd is precious and unique in the United States. During the breeding season 800 to 1200 elk gather and rut on and around Cowboy Ridge - the high ridge that divides Rock Creek and Sheep Creek. The Proposed Route and the Glass Hill Alternative would subject the large breeding concentration of elk to the noise created by corona and electromagnetic fields of a 500 kW transmission line. This is not acceptable. The DEIS has not thoroughly studied these types of impacts to this herd (nor other big game, small mammals, livestock and birds) with regard to changes in migration routes, breeding grounds and grazing. Noise from transmission lines is known to be problematic but the DEIS should also look at UV light and other disturbances that are not visible to humans but will have great impact on big game (at a minimum.) For example this link (and its sources) discusses noticeable changes in reindeer and the global threat that infrastructures of this nature have on biodiversity.

<http://www.theguardian.com/environment/2014/mar/12/animals-powerlines-sky-wildlife>

Avoidance of said elk population is better achieved by routing the transmission line to the west of Cowboy Ridge approximately 2.5 miles. The Glass Hill Alternative attempts to accomplish this by routing the line up Graves Ridge - a ridge that is broad, low slope, and with a well established road built across solid basalt and shallow soils. However as proposed, it crosses the canyons at their deepest locations where elk habitat is the greatest (good topographic cover, vegetative cover, and forage diversity.)

A slight modification to the Glass Hill Alternative could reduce the impact on habitat, greatly reduce visual presence, reduce miles of new roads, and minimize technical logistics. This modification has been proposed by some of our neighbors and BLM and ODFW are well aware of it. This modification or Variant to the Glass Hill Alternative would move the southern line 0.5 miles further to the south and entirely off of Cowboy Ridge. This modification is accomplished by extending the Graves Ridge segment of the Glass Hill Alternative, south, on up Graves Ridge another 0.5 miles, and then turning easterly to an azimuth of 110 degrees. This Variation of the line would follow a course that better blends the towers to the landscape. A bend in the Rock Creek drainage allows for the route to "drop away" from Cowboy Ridge and the surrounding high ground - reducing the visual impacts. This modification of the Glass Hill Alternative would result in reduced fragmentation of elk habitat - leaving the predominance of their rutting grounds undisturbed.

Vegetation and Weeds:

Table S-2 summarizes Initial and Residual Impacts to vegetation. The Priority Special Status Species of most concern for the Glass Hill Alternative is Douglas' Clover. Douglas' Clover is an extremely rare plant that has its best chance of avoiding extinction in populations on Ladd Marsh and Glass Hill. Any potential for ANY species extinction should make the case for the No Action Alternative.

In addition to concerns about impact to Douglas' Clover where it currently exists, a larger concern is degradation of habitat due to introduction of noxious weeds. Impact on noxious weeds is rated as high initially, and low residual. We believe the EIS should reconsider the residual impact rating of "low" because human intrusion and permanent roads will result in recurring weed introductions throughout the area. Continuing use of herbicides in the right-of-way will prevent re-establishment of native vegetation.

Cultural and Historical Resources & National Historic Trails and Study Trails:

The Proposed route will parallel (within 0.5 miles) and be visible from the Oregon Trail ruts northwest of Morgan Lake. This is not acceptable and therefore the Glass Hill Alternative, 2.5 miles to the west of the Oregon Trail route (La Grande to Hilgard) would be preferred. However, Glass Hill is called Glass Hill because of a small number of important locations for collection of obsidian for arrow point construction. The entire area was widely used by indigenous people for

hunting, camping and harvesting of first foods. The Glass Hill area was poorly surveyed for artifacts and archaeological sites. More study should be directed toward avoiding and protecting the most sensitive cultural sites.

Mitigation & Private Lands:

The DEIS does not address mitigation for any impacts. There are numerous mitigations that will be necessitated for the entire line. However, a special mitigation note must be taken with regards to Segment 2 because the majority of the line would be on private lands. Oregon Department of Fish and Wildlife will have responsibility for recommending possible mitigation. We would demand compensatory mitigation, not only on the basis of common fairness, but also because if we did not, we would not be paying the true price of this energy development and the costs are being subsidized by environmental degradation.

Special Management Considerations:

Note that Twin Lake is Registered as a Research Natural Area by the Oregon Natural Heritage Program as recognized in Union County Land Use Plan. This lowland pond supports an aquatic forbland that is unique in the Blue Mountain Province. In this context, the Glass Hill Alternative would be better than the Proposed route.

EOU's Rebarrow Forest has significance to the university's appeal and curriculum, something that should not be a minor consideration. EOU is struggling financially and experiencing declining enrollment. A project that would have any negative impact on EOU, has a negative effect on the region's economy as a whole.

EIS Process:

Finally, we feel compelled to mention that the process to date has been somewhat confusing. It feels as if the target keeps moving. Section names have changed and recent route maps that Idaho Power uses (and we have seen) are different (again) than the DEIS. Do we have a moving target? None of this is helpful for those of us 'layfolks' who are trying our best to participate in the public process. It unfortunately brings the integrity of the whole process into question. However, we are hopeful that during the next phase of study, the BLM and participating agencies will have considered the mired of issues raised above and by others; and, a full cost-benefit analysis—particularly in light of future energy technologies and needs—will have been conducted and adequately addressed.

We anxiously await the final phase of EIS study and conclusions. Please keep us informed throughout the process.