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**From:** EnviroLytical - B2H <info@envirolytical.com>  
**Sent:** Wednesday, February 11, 2015 9:58 AM  
**To:** comment@boardmantohemingway.com  
**Subject:** 4528: New Communication: In addition to comments that I offered pertaining mostly to the Timber Canyon Alternative, I would like to offer the following more general comments: 1. The amount of concerted effort

**Flag Status:** Flagged

Pete Martin <pmartin@ieee.org>

<https://el2.envirolytical.com/communication/view/101909>

In addition to comments that I offered pertaining mostly to the Timber Canyon Alternative, I would like to offer the following more general comments:

1. The amount of concerted effort that went into this Draft Environmental Impact Statement is impressive, and I appreciate the high level of competence and dedication of those who contributed to it. I hope you can understand that much adverse reaction on the part of the public comes because many who have not been playing by the rules of the game for the past seven years would like to think outside the box of certain preconceived alternatives that have been distilled from the NEPA process to date.

It is not unreasonable to take any public comment period as an opportunity to re-question the foundation of the proposed action. In particular, referring to Section 2.4, Alternatives Considered but Eliminated from Detailed Analysis, p. 2-66 of the Draft Environmental Impact Statement, just as radical amendments of Management Plans, Visual Quality Objectives, and the like are entertained in developing alternatives, in spite of the fact that Section 6.6.3 of BLM NEPA Handbook H-1790-1 (2008) provides that a suggested alternative to a proposed action may be considered but eliminated from detailed analysis if...it is inconsistent with the basic policy objectives for the management of the area, so then likewise it should be appropriate to advance No-Build alternatives that entertain amendments to those directives that ostensibly compel Idaho Power Company to meet ever-increasing projected demands for power.

Idaho Power Company can only come out ahead (financially) in this game, but if the public, via regulatory agencies, has created an untenable situation for itself by the directives that govern Idaho Power's actions, then it is incumbent upon the public, via the NEPA coordinating agency, to develop an alternative that calls for amendment of these untenable directives.

2. For the thorough consideration of certain alternatives that have been eliminated, Idaho Power Company should not be the sole technical consultant.

Section 2.4.2.2, Use of High Voltage Direct Current rather than Alternating Current (p. 2-68, under Alternatives Considered but Eliminated from Detailed Analysis) is inadequate. High Voltage DC is the favored power transmission technology for long distances in connection with offshore wind power installations with which I am familiar in the North Sea, because there is less loss than for High Voltage AC. There is no reason that The use of direct current transmission would not provide the regional transmission connectivity IPC needs. The claim that this alternative was considered but eliminated from detailed analysis because it is ineffective in meeting IPCs purposes for proposing the B2H Project is unsupported. Section 3.2.12, Public Health and Safety (beginning at p. 3-953 of the Draft Environmental Impact Statement) should include analysis for High Voltage DC power transmission in all sections covering Electrical Environment.

In Section 2.4.2.3, Bury the Transmission Line, it is stated:

Because of the high cost of an underground line compared to overhead 500-kV lines, unproven technology over long distances for 500-kV, reliability and reactive compensation issues for long installations, and increased land disturbance, the alternative of placing the 500-kV line underground is considered technically infeasible for the B2H Project,

This also is technically unconvincing. I believe the Prysmian Powerlink company has 500 kV capacity cables that have been buried at 2 meter depth for distances of the order of 100 miles. With regard to cited reactive compensation issues for long installations, ironically with respect to Idaho Power Company's dismissal of High Voltage DC as the favored

power transmission technology for long distances, there are no reactive compensation issues for DC power transmission.

Thanking you again for your consideration,

Pete Martin