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From: EnviroLytical - B2H <info@enviolytical.com>
Sent: Wednesday, February 11, 2015 9:55 AM
To: comment@boardmantohemingway.com
Subject: 4527: New Communication: Most of what follows pertains specifically to the so-called Timber Canyon alternative and to the equivalent alternative routes described by the Flagstaff and Burnt R

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<https://el2.enviolytical.com/communication/view/101908>

Most of what follows pertains specifically to the so-called Timber Canyon alternative and to the equivalent alternative routes described by the Flagstaff and Burnt River Mountain alternatives and by the Proposed Action of Idaho Power Company.

I am in accord with the Agencies' assessment that the Timber Canyon alternative should not be the Environmentally Preferred Alternative nor the Agency Preferred Alternative, but I have supplementary information and observations which might augment, or correct, the analysis presented in the Draft Environmental Impact Statement. I will number my comments so that they may be distinguished as separate points.

1. One may presume, by reference to Fig. 3-15, p. 3-221 of the Draft Environmental Impact Statement Chapter 3, that the Timber Canyon route was conceived primarily to avoid Greater Sage Grouse Priority habitat, by skirting its northern boundary. Indeed, the Draft Environmental Impact Statement Summary states, The Timber Canyon Alternative was developed to address effects on Greater Sage Grouse habitat and visual impacts on the National Historic Oregon Trail Interpretive Center, Oregon National Historic Trail segments, and concerns about visibility of the transmission line from Baker Valley (p. S-10).

This is a poor basis for development of an alternative route, for two reasons.

First, it is an artless attempt to move something unwanted from an area of known offense to an area of unknown offense, like sweeping dirt under a rug. I believe there is public- and agency consensus that it is preferable to keep transmission lines as much as possible to existing energy corridors and transportation corridors, rather than to fragment our remaining relatively unspoiled landscape, breaking new ground in industrial imposition with excursions far afield of the proposed route.

Second, the edge of the delineated Greater Sage Grouse Priority habitat is practically by definition a transition zone, and transitions zones tend to be especially rich both in biological diversity and in those almost intangible natural qualities that are important to the human spirit. In fact the Timber Canyon Alternative route passes directly over the location of several Vision Quest seats on the east-facing rim of Eagle Valley, with inspirational views from the sage-steppe country to the foothill forests to the peaks of the high Wallows. Details of this last particular follow in my second point:

2. In Table 2-12, Summary of Effects by Alternative, for the Timber Canyon Alternative (page 2-80), under the column for Cultural and Historical Resources, there is in the summary No high or moderate magnitudes of impact on historic or cultural resources. I believe this is an inadequate assessment.

In a letter of 6 November 2012 addressed to Sue Oliver, then Energy Facility Siting analyst, with copies to Holly Orr, then BLM Project Manager for the Boardman-to-Hemingway NEPA process, Todd Adams, then Idaho Power Company Project Manager, Arlene Blumton, Wallowa-Whitman National Forest NEPA Coordinator, Greg Jackle, Oregon Department of Fish and Wildlife, and Catherine Dickson, Confederated Tribes of the Umatilla Indian Reservation, I brought to the attention of concerned parties the existence of a number of sites of cultural- and historical importance located practically on the center-line of the Timber Canyon alternative route near its Mile Point 35, Sections 19, 20, and 29 of T8S R45E.

I believe these cultural resources probably meet the stricter criteria of Historical Property (as explained in Section 3.2.8.1 of the Draft Environmental Impact Statement, p. 3-737) insofar as they are places of traditional religious and cultural importance, to the past-time inhabitants of this area, and I would maintain, to present-time inhabitants, regardless of blood lineage.

Since the aforementioned letter of November 2012 was written, I have been in communication with archaeologist William Banek of the Bureau of Land Management St. George Field Office, and he has little doubt that the archaeological features in question include prayer seats, or Vision-Quest sites.

It is worth noting again (as was noted in the aforementioned letter of November 2012) that the land on which these resources of cultural importance are to be found, and which the Timber Canyon Alternative route bisects, is part of a 690-acre private property that has been managed for the past 22 years as a nature reserve and wildlife refuge, the ongoing protection- and conservation intentions for which having been formalized by the drafting of a conservation easement.

3. In Appendix F, U.S. Forest Service Management Indicator Species Reports, habitat maps for the American Marten, Northern Goshawk, and Pileated Woodpecker, for the Timber Canyon Alternative (Figs. 2, 4, and 6), do not include the eastern part of the Timber Canyon Alternative. For reasons of the often surprising diversity of wildlife found in transition zones (both with respect to elevation and with respect to watercourses), I don't think it is well to ignore the area of that eastern part of the Timber Canyon Alternative route.

4. Unreasonable importance is attached to the landscape-ruination effect of the proposed transmission line on the Oregon National Historic Trail, vis-à-vis the same effect elsewhere, especially since the Oregon Trail represents a mass migration that led to unprecedented unnatural landscape change in the region.

I knew this area before the National Historic Oregon Trail Interpretive Center was built. It stands as an eyesore on Flagstaff Hill. A transmission line through Virtue Flat would likewise be an eyesore. It would be unjustifiable to favor location of a transmission line east or north of the Interpretive Center over location of a transmission line west of the Interpretive Center solely on the basis of the visual impact to the Interpretive Center.

5. It likewise seems a bit unfair to attach greater importance to the visibility of the transmission line from Baker Valley than to its visibility from less developed areas. In fact there seems to be more justice in keeping the undesirable trappings of civilization closer to those areas which, in the final analysis, demand them!

Moreover, it seems a bit artificial or narrow-minded to assess the visual impact of the Timber Canyon Alternative in terms of six Stationary Viewing Platforms and fifteen Linear Viewing Platforms, as if people only drive along roads and stop at viewpoints. In fact it is increasingly important for our mental well-being to be able to get away from it all; there is essential value in preserving natural landscapes beyond the view of your viewing platforms.

6. In general, I don't think that impacts on recreation are adequately assessed, especially with respect to those routes (such as that of the Timber Canyon Alternative) that depart from existing energy- or transportation corridors and other developed areas. It is false that The operation and maintenance of the B2H Project would cause minimal disruption to recreational activities, as stated in the Draft Environmental Impact Statement Summary (p. S-21).

As suggested by the roots of the word, Recreation can be more than just having fun. What a secular society calls recreation may for some be akin to the vision quest of other times or cultures. Ignorance of this view is apparent in the brief paragraph on Recreation on page S-21 of the Draft Environmental Impact Statement Summary, where it is stated:

Direct effects within the 250-foot right of way and indirect effects within the analysis area would be short-term (during the construction period) and limited to those times when construction would occur in the immediate vicinity of specific recreation areas.

It may be true that people, like rats, can carry on, adapting physically and mentally to an environment fouled by their own activities, but as an example of poor judgment in the location of a high-voltage electrical power transmission line, I would point to the unfortunate imposition of such a line down the valley of the Imnaha River, almost indisputably an area of high Recreational value in the broader sense of the word.

Suffice it to say that Recreation is not just what people do at specific recreation areas, and the quality of recreation can be very much adversely affected for a very long time by the presence of a 500 kV transmission where there hadn't been one before.

7. Too much of the Environmental Impact analysis seems to pretend that most of the impact of the project would occur at the time of construction, without fully recognizing permanent losses resulting from project alternatives other than the No Action Alternative. This is reminiscent of the permanent effect of Idaho Power Company's dams on fish passage: once the fish disappear, there are no further adverse impacts on fish.

For example, on page 3-893 of the Draft Environmental Impact Statement (Section 3.2.10.5, Residual Effects, Alternatives, Climate Change, Carbon Storage), it is stated that Construction of the Timber Canyon Alternative would temporarily disturb 357 more acres of combined forest vegetation than the Proposed Action, but that Operations on the Timber Canyon Alternative would cause long-term disturbance to 41 more acres of combined forest vegetation than the Proposed Action... Even though the point is apparently that the Timber Canyon Alternative would have greater negative impact on carbon storage than the Proposed Action, the wording seems to suggest that clear-cutting 288 more acres of forest (re. Section 3.2.6.6, p. 3-442 of the Draft Environmental Impact Statement) has only short-term effects.

Thanking you kindly for your consideration of my comments,

Pete Martin