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From: Karen_Pete Riener_Martin <martinandriener@operamail.com>
Sent: Tuesday, March 17, 2015 12:37 PM
To: comment@boardmantohemingway.com
Subject: Boardman to Hemingway Transmission Line Project Draft EIS
Attachments: B2HmailedComment.pdf

Boardman to Hemingway Transmission Line Project Draft EIS Vale, Oregon

Dear Fellow Citizens,

Attached in .pdf form are my comments on the Draft EIS B2H project.

Sincerely, Karen

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Karen Riener
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<http://www.fastmail.com> - The way an email service should be

In preparing my strategy for commenting on the B2H draft EIS, I was planning on making comments to specific items. However, having gone through the draft EIS, I see that approach is not possible unless I were to spend an inordinately consuming amount of time in studying and learning this draft EIS.

Naturally, keeping cost down on the production of the draft EIS is in the back of everyone's mind. And I appreciate that, but to the degree that it is nearly impossible to say why this or that particular location is problematic and for what reasons (which information had already been requested by the leading agency) then comparing routes, if all we have to go on is this Draft EIS, seems impossible.

Alternatives are dismissed in Section 2.4 **ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS**. I feel that some of these alternatives do indeed have merit. Yet by dismissing them it turns this draft EIS into a political document. Within the structure of a political document, the outcome has been written into the document. So we the public are reduced to pitting neighbor against neighbor by being confined to voice our preferred route, by using mostly the not-in-my-backyard reasoning.

In a generalized way one can only assess that one route over another may require more avoidance, minimization, rehabilitation/restoration/rectification, offset, and compensatory mitigation, than another. Mitigation plans, by and large, result in a net loss. Finding and protecting other locations to compensate for the loss created by the transmission line route, is still a net loss. Only if areas that have already been fouled are rehabilitated/restored/rectified would mitigation be truly meaningful.

Credits and debits exchange are equally suspect in creating a true accountability in overall ecosystem health. Valuing habitats, fundamentally necessary ecosystems, unique habitats that can not be reproduced, are what we humans heretofore have not been able to do and therefore we don't know the importance of protecting them. We objectify them as categories of commerce. So creating a credit or debit for something we have not learned the value of is akin to soiling our nest, without having future nest sites. Unless most people think colonizing other planets is the path to our survival, we have populated this earth to the point where all locations habitable by humans, have been inhabited. We've pretty much reached the tipping point having fouled, fragmented, obliterated, our land. Using other places for mitigation is double jeopardy; the few remaining places are no longer enough to compensate for further destruction.

A case in point here is on the Timber Canyon alternative route. This route goes through part of the Wallowa Whitman National Forest Snow Basin Management Plan area. This Snow Basin plan has publicly stated that in order to proceed with this plan the existing management plans/guidelines have to be dropped or altered in order for the level of disturbance that is prescribed under the Snow Basin plan be allowed. So now this B2H project comes along with existing legislation that allows for special use authorization that allows the disregard of management plans in the National Forest to enable further destruction in the forest for the transmission line. The Snow Basin plan drops protective management plans and on top of that special use authorization drops protecting any

remaining protective management plans, turning that part of the National Forest into a terribly fragmented, obliterated tract of land. But we'll continue to call it our National Forest.

Species loss is already at the rate that this industrial revolution era is being defined as another one of the three mass extinctions on earth. So alternatives in 2.4 such as:

2.4.3.2 EMPLOY ENERGY CONSERVATION AND DEMAND-SIDE MANAGEMENT TO REDUCE ENERGY DEMAND

2.4.3.1 LOCATE ENERGY PRODUCTION AT THE POINT OF DEMAND TO AVOID THE NEED FOR TRANSMISSION

and others, should not only be considered but implemented if we are to have any chance of avoiding the ecological disruption caused by the fouling, fragmenting and obliterating which goes hand in hand with transmission lines and non-sustainable energy sources.

It is time for power companies to drop the old model of hub and spoke energy grids and recognize that an area which provides its own sustainable energy source is where energy development should go. I recognize the big problem that some renewable energy industries do not offer energy storage capacity, but this is an area where technological innovation, conservation, and human adaptation need to be directed. Idaho Power, and the other energy suppliers and agencies, need to change the model for supplying energy from the old way to a perspective which puts ecological sustainability as the most important condition.

There appears to be an underlying assumption, by dismissing the alternatives mentioned in section 2.4, that human beings cannot or will not change behavior. I disagree with this assumption and in fact changing behavior is the only way we will solve these energy resource problems. But the requirement to change behavior has to be built into the current and future plans for supplying energy. Idaho Power's B2H project needs to be such a transforming plan

The cost of building the B2H project is going to be phenomenal if legitimate mitigation, compliance (as adopted for example in the Programmatic Agreement) and other processes that require creating solutions on the spot are followed. These costs are above and beyond the actual costs of the infrastructure materials, labor and maintenance. This huge amount of money should be spent on the energy technologies that will support a sustainable future. We know we have to change our infrastructure to survive, and transmission lines are part of the infrastructure that grew out of the fossil fuels era. A community's self sufficiency is a component of its sustainability. Continuing to make communities, cities, and industries, reliant on energy resources that are states away does not create a sustainable way of life.

Using the compliance approach (3.2.8.2 & the Programmatic Agreement) subjects the construction of the B2H project to a reactionary and cost overrun scenario. It is an after-

the-fact way of handling problems and disagreements that arise once construction has already begun. But there is no other alternative, except to change from the hub and spokes type of energy supply to using conservation, local energy sources and new, sustainable technologies.