

Appendix K

PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND LAND-USE PLAN AMENDMENTS AND AGENCY RESPONSES TO THE COMMENTS

K.1 INTRODUCTION AND BACKGROUND

Appendix K contains the comments received by the Bureau of Land Management (BLM) on the adequacy of the Draft Environmental Impact Statement (EIS) and Land-use Plan (LUP) Amendments for the Boardman to Hemingway Transmission Line Project (Project) and the BLM's responses to those comments.

The BLM published a Notice of Availability of the Draft EIS and LUP Amendments for public review and comment in the *Federal Register* on December 19, 2014 (Volume 79, Issue 244, pages 73834-75836). The U.S. Environmental Protection Agency (EPA) also published a Notice of Availability of the Draft EIS and LUP Amendments in the *Federal Register* on the same day, which initiated a 90-day review and comment period.

The availability of the Draft EIS and LUP Amendments; deadline for public comments; and locations, dates, and times of public meetings were announced in paid newspaper legal notices, paid newspaper advertisements, on the B2H Project website, and in a newsletter and email sent to all parties on the B2H Project mailing list, including potentially affected landowners, agencies, stakeholders, and other interested parties. Federal and state agencies, tribal governments, local governments; institutions; organizations; and individuals were sent copies of the Draft EIS and LUP Amendments (43 paper copies and 439 CDs). Printed copies of the Draft EIS also were made available for public access in 28 reading rooms in the B2H Project area.

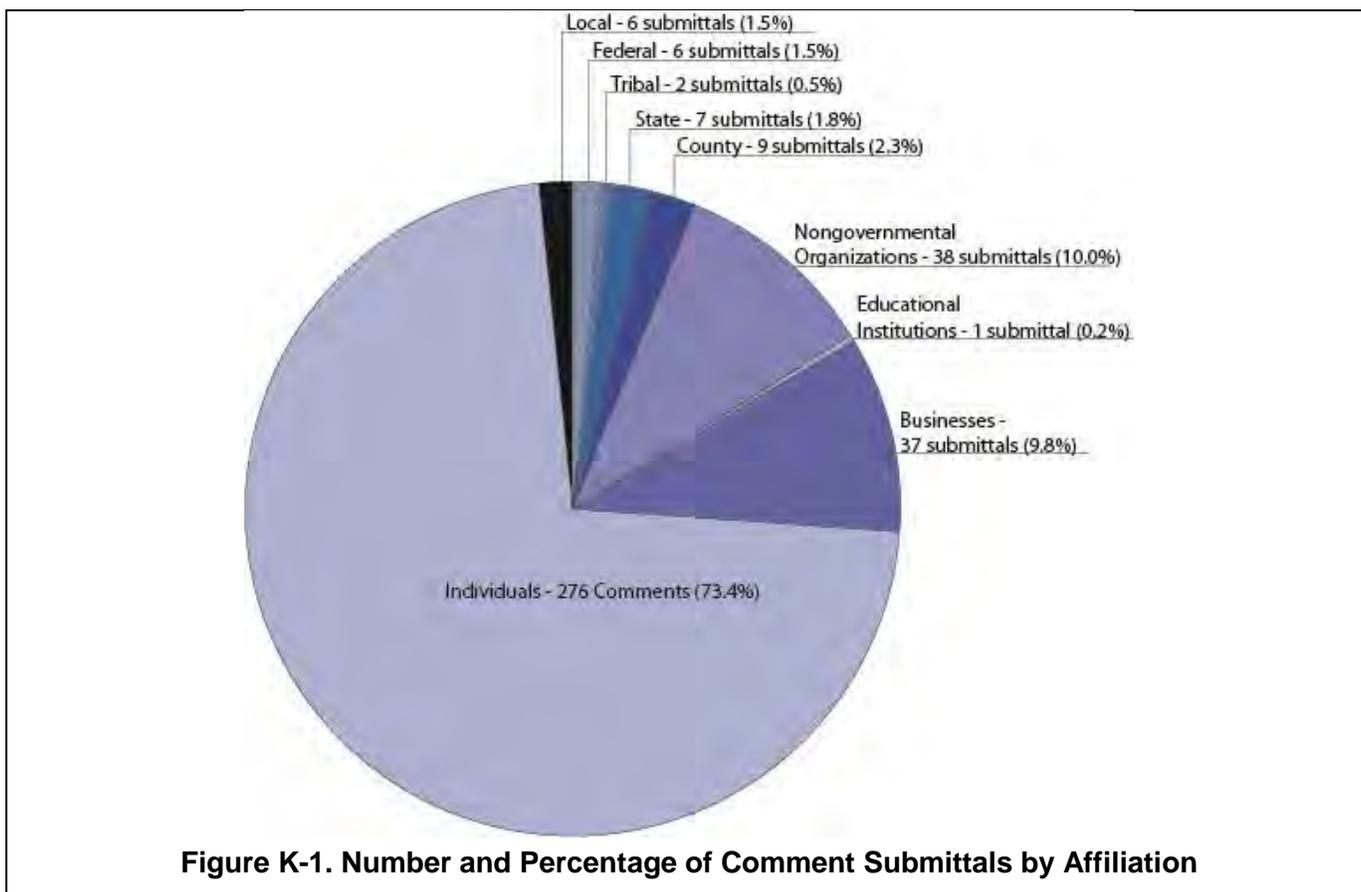
During the 90-day review and comment period, the BLM conducted seven open house meetings to provide the public with an opportunity to view informational displays on the Project, discuss the Project with BLM staff and other Project representatives, and provide comments on the Draft EIS and LUP Amendments. The open house meetings were conducted from January 5 through 9 and January 12 and 13, 2015. The open house meetings were held in Boardman, Pendleton, La Grande, Baker City, Durkee, and Ontario in Oregon and Marsing in Idaho, respectively. A total of 307 people attended the open house meetings. Information shared at the open house meetings also was formatted and posted to an online open house website available to the public during the review and comment period. The online open house had 211 visits and 141 unique visitors.

K.2 OVERVIEW OF COMMENTS

The 90-day review and comment period closed on March 19, 2015. Comment submittals (i.e., letters, emails, comment forms) received were scanned and logged, and forwarded the submittals to the third-party EIS contractor, EPG, on April 3, 2015.

A total of 382 comment submittals were received. The comment submittals were organized by affiliations shown in Figure K-1. Once organized, the comment submittals were posted to the BLM project website on April 10, 2015, to be accessible to the public.

Figure K-1 shows the number and percentage of comment submittals by affiliation and Figure K-2 shows the number and percentage of comments by affiliation.



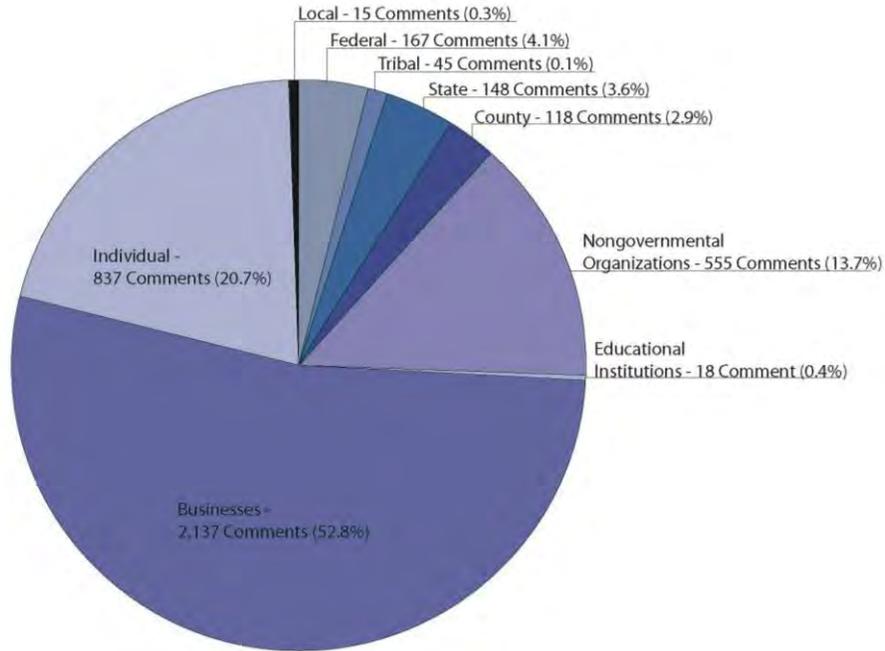


Figure K-2. Number and Percentage of Comments (Contained in Comment Submittals) by Affiliation

Each comment submittal was reviewed to identify individual comments within the submittal, which were highlighted and assigned a category. The categories were based on issue topics in the Draft EIS. Once all comments were categorized, the comments were filtered by category. The volume of comments by category is shown generally in Figure K-3.

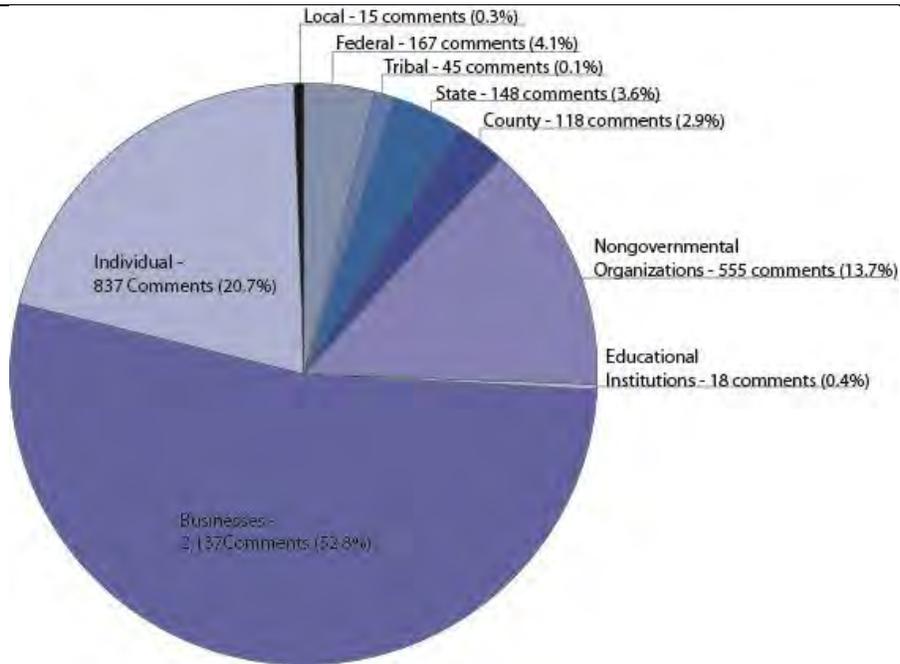


Figure K-3. Comments by Category

The categories receiving the largest volume of comments are wildlife and alternatives, then agriculture, environmental consequences, National Historic Trails, project description, land use, and socioeconomics. Note that there is some redundancy among agriculture, land use, and socioeconomic in reference to agriculture.

A number of comments recurred among all the categories:

- The data base used as the baseline to establish the existing condition of the environment was incomplete and/or not up to date.
- A systematic approach organizing the NEPA process for the Project and methodologies for conducting the resource analyses are not explained; therefore, reviewers were unable to determine the means of reaching conclusions (e.g., no criteria cited for determining levels of impact, terms describing impacts appear arbitrary).
- Some analyses do not address agency requirements.
- Mitigation and effectiveness of mitigation are not clearly applied or documented.
- Text, tables, and maps do not provide adequate or consistent information and are often confusing.
- The comparison of alternatives is reported inconsistently.

Variations of alternative routes within the B2H Project study area were suggested, including the following:

- An alternative route around the community of Durkee, recommended by Baker County
- An alternative route along Interstate 84
- An alternative that parallels the existing 230-kV transmission line to the extent practicable
- An alternative route into the Slatt Substation, which would require a route extension of approximately 10 miles, and includes a variation of the southern alternative south of Naval Weapons Systems Training Facility Boardman

Other route variations include:

- The areas where the agency-preferred alternative route were colocated closer to existing transmission lines
- A route variation west of Bombing Range Road
- A route variation in the Glass Hill area
- A route variation east of Brogan (to skirt two sage grouse leks)
- The Sunnyslope route variation, which is a variation of the Flagstaff Alternative route

In addition, opportunities for micro-siting were recommended in the comments.

In compliance with the requirements of Council of Environmental Quality regulations for implementing NEPA, all substantive comments received were analyzed and a response provided. Of the 382 comment submittals, approximately 2,150 substantive comments were identified as substantive according to BLM guidelines (BLM NEPA Handbook, H-1790-1, January 2008). Approximately 1,600

editorial comments were received from Idaho Power to address. About 250 nonsubstantive comments were identified. The BLM handbook defines substantive comments as doing one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis
- Present new information relevant to the analysis
- Present reasonable alternatives other than those analyzed in the EIS
- Cause changes to or revisions in one or more of the other alternatives

Comments not considered substantive include those:

- In favor of or against the Proposed Action or alternatives without reasoning that meets the BLM’s definition of substantive comments
- Only disagreeing with BLM policy or resource decisions without justification or supporting data that meet the BLM’s definition of substantive comments
- Not pertaining to the Project area or Project
- Taking the form of vague, open-ended questions

Additional summary of the comments is provided in the Final EIS, Chapter 2 Sections 2.1.1.

Submittals containing substantive comments on the Draft EIS and LUP Amendments are reproduced in full and presented at the end of this appendix—categorized by federal agencies, tribal governments, state agencies, county and local agencies, nongovernmental organizations, educational institutions, businesses, and individuals. For each submittal, each substantive comment is bracketed in the left margin and labeled with a letter, which corresponds with the BLM’s response on the right side of the page. Table K-1 is an index to the agencies, tribal governments, organizations, and individuals who provided comments on the Draft EIS and LUP Amendments.

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
Federal	
F1	Department of Defense, Department of the Air Force
F2	Department of Defense, Department of the Navy
F3	Department of Energy, Bonneville Power Administration
F4	Department of the Interior, National Park Service
F5	Department of the Interior, Fish and Wildlife Service
F6	Environmental Protection Agency
Tribal Governments	
T1	Confederated Tribes of the Umatilla Indian Reservation
T2	The Shoshone-Bannock Tribes

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
State	
S1	Idaho Governor's Office of Energy Resources
S2	Oregon Department of Agriculture
S3	Oregon Department of Energy
S4	Oregon Department of Fish and Wildlife
S5	Oregon Department of Land Conservation and Development
S6	Oregon Department of Transportation
S7	Oregon Parks and Recreation Department - State Historic Preservation Office
County	
C1	Baker County, Oregon
C2	Burnt River Irrigation District
C3	Joint Committee of the Owyhee Project
C4	Malheur County, Oregon
C5	Morrow County Court
C6	Morrow County Planning Department
C7	Owyhee Irrigation District
C8	Umatilla County, Oregon
C9	Union County, Oregon
Local	
L1	Baker City, Oregon
L2	City of Boardman, Oregon
L3	City of Bonners Ferry, Oregon
L4	City of Greenleaf, Oregon
L5	City of Parma, Oregon
L6	Idaho Falls Power
Nongovernmental Organizations	
N1	Columbia-Snake River Irrigators Association – March 6, 2015
N2	Columbia-Snake River Irrigators Association – March 17, 2015
N3	Defenders of Wildlife
N4	Gail Carbiener and Multiple Special Interest Groups (Oregon-California Trails Association, Hells Canyon Preservation Council, Oregon Wild, WildEarth Guardians)
N5	Glass Hill Coalition
N6	Idaho Farm Bureau Federation
N7	Lewis and Clark Trail Heritage Foundation – February 24, 2015
N8	Lewis and Clark Trail Heritage Foundation – March 16, 2015
N9	Northeast Oregon Cyclist Club
N10	Northeast Oregon Water Association
N11	Northwest Requirements Utilities
N12	Oregon Historic Trails Advisory Council – January 5, 2015
N13	Oregon Historic Trails Advisory Council – March 16, 2015
N14	Oregon Natural Desert Association and Multiple Others (Idaho Conservation League, Oregon Wild, Hells Canyon Preservation Council, and The Wilderness Society)
N15	Oregon-California Trails Association – February 25, 2015
N16	Oregon-California Trails Association – March 15, 2015

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
N17	Oregon-California Trails Association – March 16, 2015 [1]
N18	Oregon-California Trails Association – March 17, 2015 [1]
N19	Oregon-California Trails Association – March 16, 2015 [2]
N20	Oregon-California Trails Association – March 17, 2015 [2]
N21	Oregon-California Trails Association – March 16, 2015 [3]
N22	Oregon-California Trails Association – March 12, 2015
N23	Oregon-California Trails Association – March 16, 2015 [4]
N24	Oregon-California Trails Association – March 19, 2015
N25	Oregon-California Trails Association – March 18, 2015
N26	Oregon-California Trails Association
N27	Public Power Council
N28	Renewable Northwest
N29	Rocky Mountain Elk Foundation
N30	Snake River Alliance
N31	Stop Idaho Power
N32	The Nature Conservancy
N33	Theodore Roosevelt Conservation Partnership
N34	WildEarth Guardians
N35	WildLands Defense – March 19, 2015 [1]
N36	WildLands Defense – March 19, 2015 [2]
N37	WildLands Defense – March 25, 2016
Educational Institutions	
E1	Eastern Oregon University
Businesses	
B1	Baker Produce South, Inc.
B2	Battle Creek Outfitters
B3	Bokides Properties LLC
B4	Burnt River Ranch – March 19, 2015 [1]
B5	Burnt River Ranch – March 19, 2015 [2]
B6	Burnt River Ranch – March 19, 2015 [3]
B7	Burnt River Ranch – March 19, 2015 [4]
B8	Cunningham Sheep Company
B9	Elements of Health
B10	Elk Song Ranch – March 18, 2015
B11	Elk Song Ranch – March 19, 2015
B12	Fall River Rural Electric Cooperative – January 12, 2015
B13	Fall River Rural Electric Cooperative – January 13, 2015
B14	Gladstone Land Corporation
B15	GreenWood Resources, Inc.
B16	Hale Companies
B17	Homeland Fireworks
B18	Idaho County Light & Power Cooperative Association, Inc.
B19	Idaho Power Company

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
B20	Joseph Millworks, Inc.
B21	Lower Valley Energy
B22	Mackenzie Ranch LLC
B23	Matheny Ranch
B24	Meenderinck Dairy LLC
B25	Oregon Trail Trader
B26	Pacific Northwest Generating Cooperative
B27	Sage Hollow Ranch LLC
B28	Salmon River Electric Co-op – January 12, 2015 [1]
B29	Salmon River Electric Co-op – January 12, 2015 [2]
B30	Umatilla Electric Cooperative
B31	Windy River; Hale Companies; Boardman Tree Farm; Pasco Farming, Inc.
B32	Windy River
B33	Wirth Ranch, Inc.
Individuals	
I1	Rich and Nora Adamo
I2	JR and Kecia Adams
I3,	Bill Albright – January 19, 2014
I4	Bill Albright – February 15, 2015
I5	Jennifer Albright
I6	Mark and Susie Alexander
I7	Anna Allen
I8	Brad and June Allen
I9	Justin Allen
I10	Logan Allen
I11	Ann Allison
I12	Stephen Anderson
I13	Karen Andrade
I14	Chris Arvidson
I15	Jayne Bailey
I16	Kayla Bailey
I17	Shana Bailey
I18	Lois Barry
I19	Peter Barry
I20	Carolyne Berg
I21	Jessica Berg
I22	Linda Bergeron
I23	Terri and Mark Berthelsen
I24	Roger Blair
I25	Diane Bloomer
I26	Ted Bloomer
I27	Kim Boddie
I28	Patti Bolthouse

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
I29	Sarah Brandt
I30	Shelley Bresnen
I31	Timothy and Patricia Brewer
I32	Thomas Brown – January 10, 2015
I33	Thomas Brown – February 26, 2015
I34	Gerda Brownton and Lanetta Paul
I35	Harold Bruning
I36	Cheryl Buchanan
I37	Chuck Buchanan
I38	Jean Bunch
I39	Rodd Bunch
I40	Wayne Burck
I41	Marty Campbell
I42	Vicki Cantlon
I43	Gail Carbiener – January 5, 2015
I44	Gail Carbiener – January 26, 2015
I45	Gail Carbiener – January 31, 2015
I46	Gail Carbiener – February 8, 2015
I47	Gail Carbiener – February 17, 2015
I48	Gail Carbiener – February 19, 2015
I49	Gail Carbiener – March 6, 2015
I50	Mike Carnahan
I51	Dawn Carroll
I52	Tina Cave
I53	Ivar Christensen
I54	Brett Christiano
I55	Linda Christiano
I56	Norm Cimon
I57	Matt Cooper
I58	Robert Coward
I59	Kaela Curtis
I60	Kalley Dean
I61	Tiah DeGrofft
I62	Stephen Dennis
I63	Steve Deruyter
I64	Whit Deschner – January 5, 2015
I65	Whit Deschner – February 2, 2015
I66	Whit Deschner – March 5, 2015
I67	Whit Deschner – March 15, 2015
I68	Susy Dewald
I69	Richard D'Ewart
I70	Brittany Doherty
I71	Raymond and Teri Doherty

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
I72	Linda Doman
I73	Dennis Dorrah
I74	Roy Durfee
I75	Corrine Dutto
I76	Raymond Egan
I77	Christine Eidson
I78	Shirley Evans
I79	Julie Eyler
I80	Connie Feltman
I81	Matt Fisher
I82	William Flack
I83	Dick Fleming
I84	Elaine Fleshman
I85	Patricia Fletcher
I86	Heidi Fluegel
I87	Karen Ford
I88	Warren and Kay Forsythe
I89	Suzanne Fouty
I90	Kathy Franzwa
I91	Sharon Gaines
I92	Cynthia Gallaher
I93	Dave Gallaher
I94	Marie Gaylord
I95	Melinda Giddings
I96	Charles Gillis
I97	Judith Glad
I98	Joel Goldstein
I99	Randell Guyer
I100	Allen Hack
I101	Steven Hahn and Lois Grushka
I102	Marie Hall – March 15, 2015
I103	Marie Hall – March 18, 2015
I104	Robert Hall
I105	Tessa Hamilton
I106	Patricia Hammill
I107	Ann Marie Hardin
I108	Bob Harrell
I109	Jacki Harrison
I110	John Hayes
I111	Stafford Hazelett
I112	Fred and Evelyn Heid
I113	Monte Heid
I114	Jennifer Heimgartner

Table K-1. Index to Comment Submittals

Submittal Number	Name/Affiliation
1115	Richard Heinemann
1116	Ramona Helgerson
1117	Kristi Hergert
1118	Richard Herman
1119	Doris Hess
1120	Naomi Hilary
1121	Maxine Hines
1122	Gayle Hoefft
1123	Chuck and Suzanne Hornbuckle
1124	Suzanne Spencer Hornbuckle
1125	Jack and Dianne Horton
1126	Nancy Horton
1127	Linda Hudson
1128	Ann Humes
1129	Bruce and Carol Hummel
1130	P. Jackson
1131	Rachel Janzen
1132	Kenneth Jensen
1133	Garth and Tonia Johnson
1134	Rachel Joost
1135	Barb Kabel
1136	Flossie Keeler
1137	Frank Keith
1138	John Kilkenny
1139	Robin Klotz – January 25, 2015
1140	Robin Klotz – March 12, 2015
1141	Edward Kotz
1142	Jim and Fuji Kreider
1143	Carolyn Kulog
1144	Piers Lamb
1145	Sarah Lamborn
1146	Dennis Larsen
1147	Harry Larson
1148	Jennifer Levanger
1149	Frances Lewis
1150	Meredee Lloyd
1151	Mark Lobbestael
1152	Kevin and Marilyn Logsdon
1153	Lacey Loughmiller
1154	George Luciani
1155	Deedee Lum
1156	Robert Lynch
1157	Christopher and Margie Lyon

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
I158	Charles Lyons
I159	Anne March
I160	Peter and Verna Markgraf
I161	William and Calesta Markgraf
I162	Gary Marlette
I163	JoAnn Marlette
I164	Peter Martin – February 11, 2015 [1]
I165	Peter Martin – February 11, 2015 [2]
I166	Nathan Marvin
I167	Dorothy Mason
I168	Paul Masee
I169	Michael McAllister
I170	Pat and Sue McCarthy
I171	Sue McCarthy
I172	Mary McCracken – December 27, 2014
I173	Mary McCracken – March 6, 2015
I174	Mary McCracken – March 11, 2015
I175	Phyllis McGarry
I176	Mike McGinnis
I177	Nicky McGinnis
I178	Michael McGourty
I179	Patrick McGourty
I180	Paige McKague
I181	Robert McKim
I182	Ann Mehaffy
I183	Baker Merlyn
I184	John Milbert
I185	Jenny Miller
I186	Marie Miller
I187	Mary Miller
I188	Lynn Miracle
I189	William and Kathleen Mitchell
I190	David and Maxine Moody
I191	David Moody
I192	Michael and Barbara Morehead
I193	Larry and Rochelle Morris
I194	Ralph Morter
I195	Munds
I196	N.R. Munn
I197	Gwenda Music
I198	Leta Neiderheiser
I199	Bradley Nelson
I200	Lloyd Nelson

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
I201	William and Margaret Nolan
I202	Bobby Oelke
I203	Richard Owen
I204	Carrie Parks
I205	Lethene Parks
I206	Lanetta Paul
I207	Gary Pearson
I208	Peggy Pearson
I209	Bruce Penn
I210	Nancy and Elizabeth Peyron
I211	Patricia Phillips
I212	Thomas Phillips
I213	Buck Pilkenton
I214	Richard Pingrey
I215	Tisha Porter
I216	Jean Public
I217	Michael and Donna Ragsdale
I218	Teri Rasmussen
I219	Kayla Reffett
I220	Peggy Renfroe
I221	Nona Rhea
I222	Christine Rieb
I223	James Riehl
I224	Sallie Riehl
I225	Karen Riener
I226	The Roberts Family (Billie, Jesse, Troy, and Ladd)
I227	Ron and Ann Rowan
I228	Lloyd Royer
I229	Leanne Ruby
I230	Valerie Russell
I231	Deanne Sams
I232	Richard Sandford
I233	Tracie Saunders
I234	Curtis Sauret
I235	Evelyn Price Sayers
I236	Kristen Sayers
I237	Gordon and Judy Schroeder
I238	Briana Schumacher
I239	Lester Scott
I240	Marley Shurtleff
I241	Gary Smith
I242	Larry Smith
I243	Heather Solisz

Table K-1. Index to Comment Submittals	
Submittal Number	Name/Affiliation
I244	Larry and Laurie Solisz
I245	Karen Steenhof
I246	Linda Kay Stelle
I247	Julie Summerfield
I248	Lauren and Anita Swartz
I249	Gail Taber
I250	Erin Taggart
I251	Colby Thompson
I252	Kathy and Deward Thompson
I253	Thomas Thompson – January 20, 2015
I254	Thomas Thompson – March 17, 2015
I255	Michael and Ann Trindle
I256	Andy and Karen VanderPlaat
I257	Champ Vaughan
I258	Debra Votaw and Merlyn Baker
I259	Kami Walborn
I260	Edward Walsh
I261	Frank Walter
I262	Lindsey Ward
I263	Adolph Weinke
I264	Danna Werner
I265	Kenneth and Anita West
I266	Kristin Whiteid
I267	M. Blaine and S. June Wilber
I268	John Williams
I269	Frances Wilson
I270	John Winters
I271	Marcia Wirth
I272	Lesley Wischmann
I273	Jill Wyatt
I274	David and Karen Yeakley
I275	Vivian Zikmund