BONNEVILLE POWER ADMINISTRATION

Hooper Springs Transmission Project

Final Environmental Impact Statement

January 2015

DOE/EIS-0451

HOOPER SPRINGS TRANSMISSION PROJECT

Final Environmental Impact Statement

DOE/EIS - 0451

Bonneville Power Administration

Cooperating Agencies

U.S. Department of Agriculture, Forest Service, Caribou-Targhee National Forest

U.S. Department of Interior, Bureau of Land Management

Idaho Governor's Office of Energy Resources

January 2015

Hooper Springs Transmission Project

Responsible Agency: U.S. Department of Energy (DOE), Bonneville Power Administration (BPA)

Cooperating Agencies: U.S. Department of Agriculture, Forest Service (USFS), Caribou-Targhee National Forest (C-TNF); U.S. Department of Interior, Bureau of Land Management (BLM); Idaho Governor's Office of Energy Resources

Title of Proposed Project: Hooper Springs Transmission Project (Project), DOE/EIS - 0451

State Involved: Idaho

Abstract: BPA is proposing to build a new, 115-kilovolt (kV) transmission line in Caribou County, Idaho from a proposed new 138/115-kV BPA substation (Hooper Springs Substation), near the city of Soda Springs, Idaho, to either an existing Lower Valley Energy (LVE) substation or a proposed BPA connection facility that would connect with LVE's existing transmission system in northeastern Caribou County. BPA also would construct an approximately 0.2-mile-long, single-circuit 138-kV transmission line between the new Hooper Springs Substation and PacifiCorp's existing Threemile Knoll Substation to connect the new line to the regional transmission grid. BPA is considering a North Alternative, including two route options (the Long Valley Road and North Highland Road options) and a South Alternative, including five route options (Options 1, 2, 3, 3A, and 4) for the proposed transmission line. BPA's preferred alternative is the South Alternative's Option 3A. BPA is also considering the No Action Alternative.

The Project is needed to increase reliability to the southern portion of LVE's transmission system and to address ongoing electricity use (load) growth in southeast Idaho and northwest Wyoming.

The Project could create impacts on land use and recreation, visual resources, vegetation, geology and soils, water resources, wildlife, fish, cultural resources, social and economic resources, public health and safety, transportation, air quality, noise, and greenhouse gases. Chapter 3 of the EIS describes the affected environment and potential impacts in detail, as well as mitigation measures.

BPA issued a Preliminary Environmental Assessment (EA) (DOE/EA-1567) for the Project in May 2009 (BPA 2009) that analyzed potential environmental impacts associated with Options 1, 2, 3, and 4 of the South Alternative. After discovering that all of these options might have potential soil contamination issues from mining activities, BPA developed the North Alternative to avoid mining areas and analyzed both the North and the South Alternatives in a draft Environmental Impact Statement (EIS) released in March 2013. After release of the draft EIS, BPA identified a new alignment for the South Alternative (Option 3A) and so prepared and released a supplemental draft EIS in May 2014 that included this option for public review and comment. BPA now is issuing this document which includes responses to comments on the supplemental draft EIS, and together with the supplemental draft EIS, constitutes the final EIS (40 CFR 1503.4(c)).

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For additional copies of this document, please call 1-800-622-4520 and ask for the document by name. The EIS is also on the Internet at: www.bpa.gov/go/HooperSprings.

You may also request copies by writing to:

Bonneville Power Administration
P. O. Box 3621
Portland, Oregon 97208
ATT: Public Information Center - CHDL-1

For additional information on DOE NEPA activities, please contact Carol M. Borgstrom, Director, Office of NEPA Policy and Compliance, GC-20, U.S. Department of Energy, 1000 Independence Avenue S.W., Washington D.C. 20585-0103, phone: 1-800-472-2756 or visit the DOE NEPA website at www.eh.doe.gov/nepa.

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Hooper Springs Transmission Project
Final Environmental Impact Statement

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1 Introduction

This document presents the comments received on the Hooper Springs Transmission Project supplemental draft environmental impact statement (EIS) (DOE/EIS-0451, May 2014), Bonneville Power Administration's (BPA's) responses to those comments, and corrections to the supplemental draft EIS. Consistent with the Council on Environmental Quality's (CEQ's) Regulations for Implementing the National Environmental Policy Act (NEPA), this document and the supplemental draft EIS comprise the final EIS for this project because changes in the EIS in response to comments generally involve minor corrections (40 Code of Federal Regulations [CFR] 1503.4(c)). For readers of this document who do not already have a copy of the supplemental draft EIS, copies can be obtained by the following means:

- Accessing the document online at: http://efw.bpa.gov/environmental_services/Document_Library/HooperSprings/
- Calling BPA's document request line at 1-800-622-4520
- Sending an e-mail to Ms. Tish Eaton, Project Environmental Lead, at tkeaton@bpa.gov

The remainder of this chapter provides a summary of the Proposed Hooper Springs Transmission Project (Project) and Alternatives and the No Action Alternative, a description of the comment period for the supplemental draft EIS, and an overview of the key changes to the supplemental draft EIS. Chapter 2 identifies the specific corrections that have been made to the supplemental draft EIS. Chapter 3 presents comments received on the supplemental draft EIS (organized by the chapters and sections of the supplemental draft EIS) and BPA's responses to these comments. Chapter 4 presents all the comment letters and e-mails received on the supplemental draft EIS, as well as comments from the public meeting held on May 27, 2014.

1.1 Summary of Proposed Project and Alternatives and No Action Alternative

1.1.1 Proposed Project and Alternatives

BPA is a federal agency in the Pacific Northwest that owns and operates about three-fourths of the high-voltage transmission lines in its service territory. Among other things, BPA is responsible for marketing and transmitting electrical power to utility, industrial, and other customers in the Pacific Northwest. BPA has a statutory obligation to ensure it has sufficient capability to serve its customers through a safe and reliable transmission system.

BPA is proposing to build a new, 115-kilovolt (kV) transmission line in Caribou County, Idaho. This proposed line would extend from a proposed new 138/115-kV BPA substation, referred to as the Hooper Springs Substation, near the city of Soda Springs, Idaho, to either an existing Lower Valley Energy (LVE) substation or a proposed BPA connection facility that would connect with LVE's existing transmission system in northeastern Caribou County (see Map 1-1).

BPA also would construct an approximately 0.2-mile-long, single-circuit 138-kV transmission line between the proposed Hooper Springs Substation and PacifiCorp's existing Threemile Knoll Substation to connect the new line to the regional transmission grid. The proposed project is needed to improve the stability and reliability of the transmission system in southeast Idaho and northwest Wyoming.

Two alternatives with route options are evaluated in the EIS to meet the purpose and need for the project: the North Alternative including two route options (see Map 1-2), and the South Alternative including five route options (see Map 1-3). The No Action Alternative is also evaluated in the EIS.

North Alternative and Route Options

The North Alternative would include a new, approximately 33-mile-long, single-circuit 115-kV transmission line in Caribou County north of Soda Springs, Idaho, that would extend from the proposed BPA Hooper Springs Substation generally north and then east to the existing LVE Lanes Creek Substation. This alternative also would include construction of the 138/115-kV BPA Hooper Springs Substation, which would be located about 3 miles directly north of the city of Soda Springs along Threemile Knoll Road. New 115-kV substation facilities within the boundaries of LVE's existing Lanes Creek Substation, which is located east of the unincorporated community of Wayan, Idaho, also would be constructed. A new 0.2-mile, single-circuit 138-kV transmission line that would extend from the proposed Hooper Springs Substation generally south to PacifiCorp's existing 345/138-kV Threemile Knoll Substation would be constructed to connect the new line to the regional transmission grid.

Long Valley Road Option—The Long Valley Road Option would move a portion of the North Alternative off state of Idaho lands and increase the length of the transmission line by approximately 0.6 mile.

North Highland Option—The North Highland Option is about 2.2 miles long and would move a portion of the North Alternative corridor on to primarily Caribou-Targhee National Forest (C-TNF) lands. This option is the same length as the portion of line replaced along the North Alternative (also about 2.2 miles).

The main components of the North Alternative and its options would be as follows:

- **Transmission line right-of-way(ROW)**—The North Alternative, including its two route options, would require a 100-foot-wide ROW for the new single-circuit 115-kV transmission line, a 150-foot-wide ROW for the new 138-kV line, and a 50-foot-wide ROW for new and reconstructed access roads.
- **Transmission structures**—The North Alternative would require approximately 234 new structures over its 33-mile length. Approximately 10.9 miles would be constructed using approximately 74 steel single-pole structures between Hooper Springs Substation and line mile 12 (see Map 1-2). Approximately 160 wood, H-frame structures would be installed over the remaining approximately 21 miles between line mile 12 and the Lanes Creek Substation (see Map 1-2). The proposed 138-kV transmission line would require two wood, H-frame structures over its

approximately 0.2-mile length. The Long Valley Road Option would be constructed using steel single-pole structures (requiring the use of 7 additional steel structures compared to the North Alternative). All of the North Highland Option would be composed of wood, H-frame structures and would require about the same number of wood-pole structures as the North Alternative portion of line. The wood, 115-kV H-frame structures for the North Alternative would be approximately 55 to 105 feet tall and the steel poles would be about 80 to 110 feet tall. All wood structures and most steel structures for the North Alternative would be directly embedded into the ground using a drill rig to auger the holes.

- **Conductors**—Conductors, wires that carry the electrical current on a transmission line, would be suspended from structures with insulators. Insulators, made of non-conductive materials (porcelain or composite materials), would be installed to prevent electric current from passing from the conductor through the structures to the ground.
- **Overhead ground wire and counterpoise**—One to two small wires (0.38-inch diameter), called overhead ground wires would be attached to the top of the structures. Steel pole structures would have one overhead ground wire, while wood pole structures would have two. The ground wires would be strung from the top of one structure to the next. Ground wires are used for lightning protection. If lightning strikes, the overhead ground wire takes the charge instead of the conductors. To take the lightning charge from the overhead ground wires and dissipate it into the earth, a series of wires called counterpoise would be buried in the ground at the base of the steel and wood pole structures and within the North Alternative and route options transmission line ROW. Up to four counterpoise wires could be buried up to 100 feet from the structures.
- **Fiber optic cable**—A fiber optic cable would be installed from Threemile Knoll Substation to the proposed Hooper Springs Substation along the 0.2 mile 138-kV transmission line. No fiber optic cable is proposed for the 115-kV transmission line. The fiber would be used for communications as part of the power system.
- **Pulling/tensioning sites**—The conductors are pulled and tightened to the correct tension during construction. About 17 temporary pulling and tensioning sites would be required for construction of the North Alternative and two sites would be required for the 138-kV line. Pulling sites would be within or next to the North Alternative ROW. An area about 100 feet wide by 300 feet long, or about 0.7 acre, would be temporarily disturbed at each pulling and tensioning site.
- **Staging areas and other work areas**—Two temporary staging areas would be needed along or near the proposed transmission line for construction crews to store materials, equipment, and vehicles, and house a small office trailer. One of the staging areas would be located near the Hooper Springs Substation and would be used for both the 115-kV and 138-kV lines. The second staging area would be located near the eastern end of the North Alternative corridor. It is anticipated that approximately 10 acres of land would be required for each staging area.
- **Substations**—The North Alternative would require construction of the proposed Hooper Springs Substation at the southwestern end of the North Alternative corridor.

The proposed substation facilities would be constructed at LVE's existing Lanes Creek Substation and would be located at the northeastern end of the North Alternative corridor.

- **Access roads**—For the North Alternative, approximately 21.7 miles of new, permanent access road would be constructed, including 900 feet of new road to access Hooper Springs Substation. Approximately 10.6 miles of existing access road would be improved or reconstructed.
- **Vegetation clearing**—All tall-growing vegetation within the 100 or 150 foot transmission line ROW would be removed. On either side of the new ROW, danger trees that pose a hazard to construction activities and reliable operation of the transmission line also would be removed. During construction, low-growing plant communities would be protected as much as practicable and promoted as the basis for ongoing vegetation management following construction. In addition to vegetation clearing within the North Alternative ROW, vegetation would need to be cleared where new access roads are proposed outside of the ROW. Most of the vegetation along the North Alternative transmission line ROW is prairie and open areas, both of which are compatible with transmission lines. However, a portion of the North Alternative corridor would cross forested C-TNF lands where the C-TNF has requested BPA clear a 250-foot-wide area for the transmission line. The 250-foot cleared area would be centered on the 100-foot transmission line ROW and initially be cleared of all tall growing vegetation. During operation of the North Alternative, only vegetation within the 100-foot transmission line ROW would be managed as low growing.
- **Maintenance**—During the life of the project, BPA would perform routine, periodic maintenance and emergency repairs to the transmission line. BPA typically conducts routine helicopter inspection patrols twice a year. Vegetation also would be maintained along the line for safe operation and to allow access to the line.

South Alternative and Route Options

The South Alternative would include a new, approximately 22.5-mile-long, double-circuit 115-kV transmission line that would extend from BPA's proposed Hooper Springs Substation generally north to northeast for 6 to 8 miles before turning generally east to a proposed connection with LVE's existing transmission system in Caribou County, Idaho (see Map 1-3). The new connection facility with LVE's existing transmission system would be located about 2 miles southeast of the intersection of Blackfoot River Road and Diamond Creek Road. Similar to the North Alternative, the South Alternative would include construction of the 138/115-kV Hooper Springs Substation and the 0.2-mile, single-circuit 138-kV transmission line to connect the line to PacifiCorp's existing 345/138-kV Threemile Knoll Substation.

The five route options of the South Alternative all begin at the proposed Hooper Springs Substation and end at the proposed connection facility with LVE. The proposed location of the 138-kV transmission line would be the same as the South Alternative for all five route options.

Option 1 (2007 Proposed Transmission Line Route) and Option 2 (Narrows Transmission Line Route)—Options 1 and 2 would follow the same general route as the South Alternative corridor with one to two minor deviations near Conda and at the Blackfoot River Narrows. Option 1 would be about 23.1 miles long and Option 2 would be about 22.4 miles long.

Option 3 (Original Proposed Transmission Line Route)—Option 3 would follow a route similar to the first part of the North Alternative west of Idaho State Highway 34 (Highway 34) before turning and rejoining the same general corridor as the South Alternative east of Highway 34. Option 3 would be about 24 miles long.

Option 3A (Transmission Line Route Variation of Option 3)—Option 3A would follow a route similar to the first part of the North Alternative west of Highway 34 before turning and rejoining the same general corridor as the South Alternative and Option 3 east of Highway 34 until Option 3A's line mile 17. Between line miles 17 and 20, the corridor would travel northeast and southeast to the Blackfoot River Narrows. From the Narrows, Option 3A would follow the same general corridor as the South Alternative for about 1 mile before heading northeast across the C-TNF and the Blackfoot River Wildlife Management Area (Blackfoot River WMA) to its point of connection with the existing LVE line. Option 3A would be about 24 miles long.

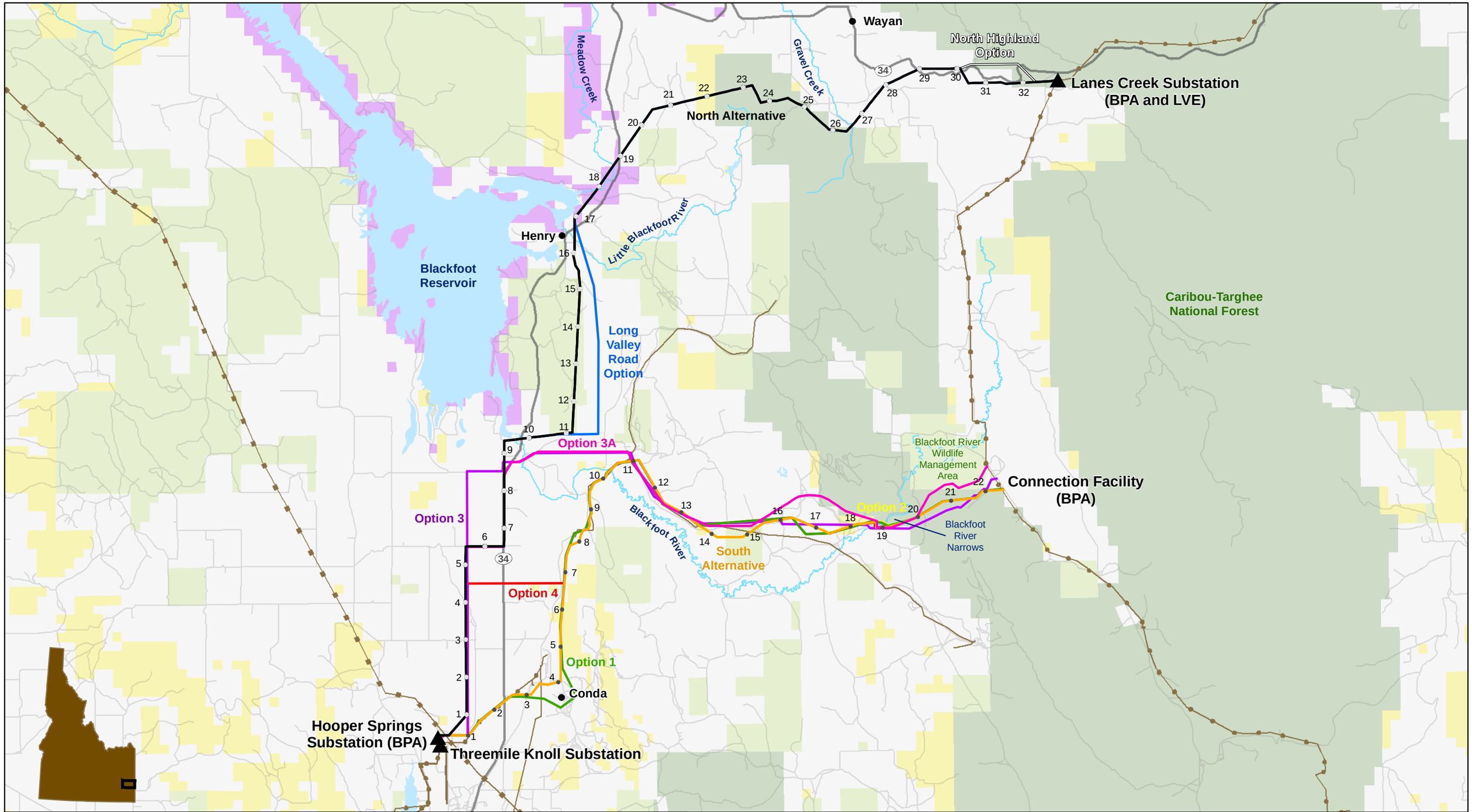
Option 4 (Tailing Pond Transmission Line Route)—Option 4 would follow the same route as Option 3 for about 4.5 miles before turning east across Highway 34 to connect back with the South Alternative corridor. Option 4 would be 23.2 miles long.

The main components of the South Alternative and its options would be as follows:

- **Transmission line ROW**—The South Alternative, including its five route options, would require a 100-foot-wide ROW for the new single-circuit 115-kV transmission line, a 150-foot-wide ROW for the new 138-kV line, and a 50-foot-wide ROW for new and reconstructed access roads.
- **Transmission structures**—The South Alternative would require approximately 210 new 115-kV double-circuit steel structures over about 23 miles. Route options would require about the same amount of steel structures as the South Alternative: Option 1 would be about 0.6 mile longer; Option 2 about 0.1 mile shorter; Options 3 and 3A would be about 1.5 miles longer; and Option 4 would be about 0.7 mile longer. Similar to the North Alternative, the proposed 138-kV transmission line under the South Alternative would require two wood, H-frame structures over its approximately 0.2-mile length. The 138-kV wood structures would be the same as those described under the North Alternative. The steel poles for the South Alternative would be about 55 to 120 feet tall. Also similar to the North Alternative, all steel structures would be directly embedded into the ground using a drill rig to auger the holes.
- **Conductors**—Conductors would be same to those described for the North Alternative.
- **Overhead ground wire and counterpoise**—Two overhead ground wires would be attached to the top of the structures for the South Alternative and all route options.

- **Fiber optic cable**—A fiber optic cable would be installed along the 0.2 mile 138-kV transmission line similar to the North Alternative. No fiber optic cable is proposed for the 115-kV transmission line.
- **Pulling/tensioning sites**—About 11 temporary pulling and tensioning sites would be required for construction of the South Alternative along with two sites for the 138-kV line. Pulling sites would be within or next to the South Alternative ROW. Similar to the North Alternative, an area about 100 feet wide by 300 feet long, or about 0.7 acre, would be temporarily disturbed at each pulling and tensioning site.
- **Staging areas and other work areas**—Two temporary staging areas about 10 acres each would be needed along or near the South Alternative for construction. Similar to the North Alternative, one of the staging areas would be located near the Hooper Springs Substation and used for both the 115-kV and 138-kV lines. The second staging area would be located near the eastern end of the South Alternative corridor. It is anticipated that approximately 10 acres of land would be required for each staging area.
- **Substations**—The South Alternative and all route options would require construction of the proposed Hooper Springs Substation at the southwestern end of the North Alternative corridor. The connection of the 115-kV double-circuit line under the South Alternative to LVE's existing transmission system at the northeastern end of the South Alternative corridor would require construction of a new connection facility at this location. This connection facility would be constructed within BPA's new transmission line ROW and LVE's existing transmission line ROW along Diamond Creek Road, at a point about 2 miles southeast of the intersection of Blackfoot River Road and Diamond Creek Road. The new double-circuit line would connect into the existing LVE line through overhead line disconnect switches.
- **Access roads**—For the South Alternative, approximately 22.8 miles of new, permanent access road would be constructed, including 900 feet of new road to access Hooper Springs Substation. Approximately 2 miles of existing access road would be improved or reconstructed.
- **Vegetation clearing**—Vegetation clearing under the South Alternative would be the same as described for the North Alternative. The South Alternative corridor also would cross forested C-TNF lands where BPA would, at the request of the C-TNF, clear a 250-foot-wide area along the length of transmission line. Similar to the North Alternative, only the 100-foot ROW would be managed for low-growing species during operation of the transmission line.
- **Maintenance**—During the life of the project, BPA would perform routine, periodic maintenance and emergency repairs to the transmission line. BPA typically conducts routine helicopter inspection patrols twice a year. Vegetation also would be maintained along the line for safe operation and to allow access to the line.

BPA has identified Option 3A as its preferred alternative (Map 1-3). This route option of the South Alternative is described above.


Wayan
North Highland Option
Lanes Creek Substation (BPA and LVE)
Meadow Creek
Gravel Creek
North Alternative
Henry
Little Blackfoot River
Blackfoot Reservoir
Caribou-Targhee National Forest
Long Valley Road Option
Option 3A
Option 3
Option 4
Option 1
Option 2
South Alternative
Blackfoot River
Blackfoot River Wildlife Management Area
Blackfoot River Narrows
Connection Facility (BPA)
Conda
Hooper Springs Substation (BPA)
Threemile Knoll Substation
Substation
City
Mile Markers - North Alternative
North Alternative
Long Valley Road Option
North Highland Option
Mile Markers - South Alternative
South Alternative
Option 1
Option 2
Option 3
Option 3A
Option 4
Land Ownership
Caribou-Targhee National Forest
Bureau of Land Management
Bureau of Indian Affairs
State Land
Private Land
Local Road
State Route
Existing Transmission
46 kV
138 kV
345 kV
N
W
E
S
Coordinate System: NAD 1983 State Plane Idaho East (feet)
Projection: Transverse Mercator
Datum: North American 1983
0 1 2 4 6 8 Miles
Hooper Springs Transmission Project
Map 1-1
Overview of the Project Area
Date: 12/9/2013

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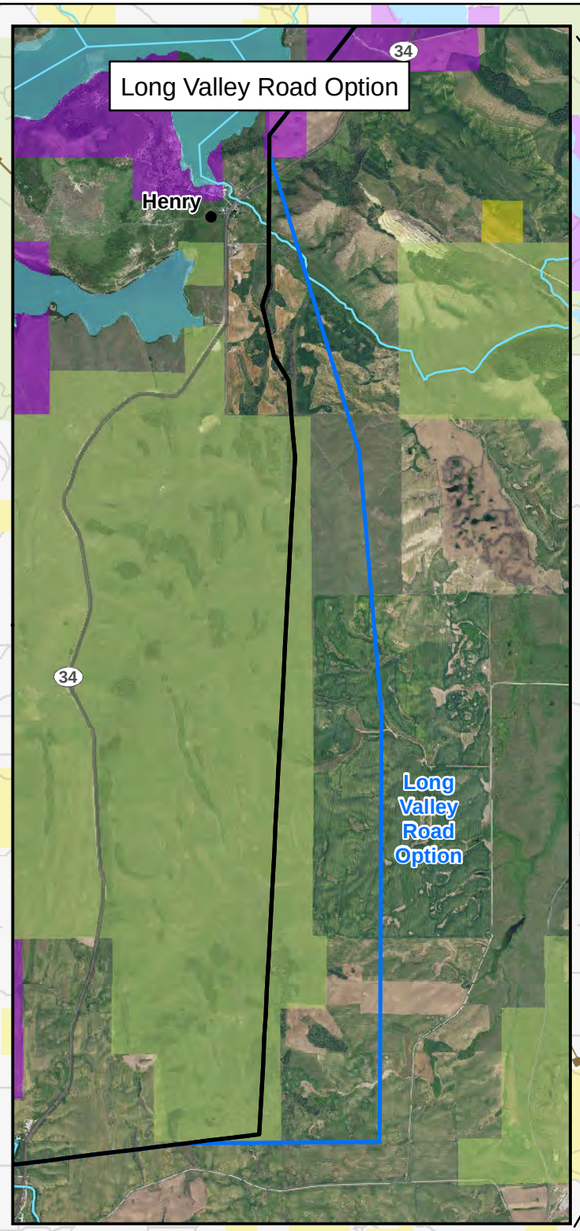

Substation
City
Mile Markers - North Alternative
North Alternative
Long Valley Road Option
North Highland Option

Land Ownership
Caribou-Targhee National Forest
Bureau of Land Management
Bureau of Indian Affairs
State Land
Private Land

Local Road
State Route

Existing Transmission
46 kV
138 kV
345 kV

N
W E
S

Coordinate System: NAD 1983 State Plane
Idaho East (feet)
Projection: Transverse Mercator
Datum: North American 1983

0 1 2 4 6 8 Miles

Date: 12/19/2013

Hooper Springs Transmission Project

Map 1-2
North Alternative Route Options

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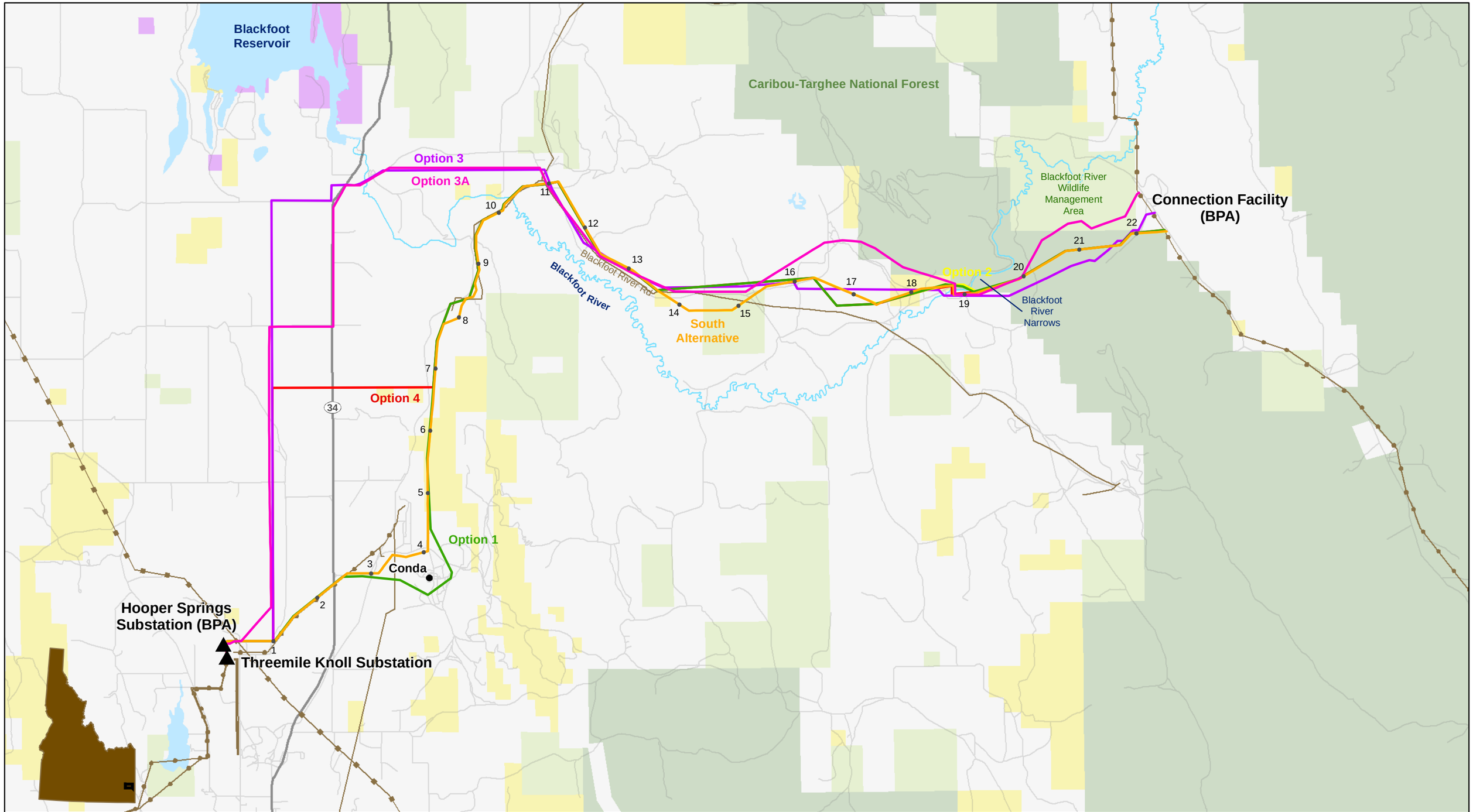

Substation
South Alternative
Option 1
Option 2
Option 3
Option 3A
Option 4

Mile Markers - South Alternative

Land Ownership
Caribou-Targhee National Forest
Bureau of Land Management
Bureau of Indian Affairs
State Land
Private Land

City
Local Road
State Route

Existing Transmission
46 kV
138 kV
345 kV

N
W E
S

Coordinate System: NAD 1983 State Plane
Idaho East (feet)
Projection: Transverse Mercator
Datum: North American 1983

0 0.5 1 2 3 4 5 Miles

Hooper Springs Transmission Project

Map 1-3
South Alternative and Route Options

Date: 12/9/2013

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1.1.2 No Action Alternative

Under the No Action Alternative, BPA would not construct the Project. Without the new line, it is expected that voltage stability and reliability problems on the transmission grid in this area would continue. Further, the growing energy requirements of southeast Idaho and northwest Wyoming may not be met.

1.2 Supplemental Draft EIS Issuance and Comment Period

BPA published the Hooper Springs Transmission Project supplemental draft EIS in May 2014. The supplemental draft EIS served to supplement the draft EIS for the Project, which had been released by BPA in March 2013. The primary reason BPA chose to publish a supplemental draft EIS was BPA had identified a new alignment for the South Alternative (Option 3A) after release of the draft EIS, and wanted to ensure sufficient opportunity for public review and comment on that option. Accordingly, BPA prepared the supplemental draft EIS to include Option 3A. The supplemental draft EIS also included responses to all public comments that had been received by BPA on the draft EIS.

The supplemental draft EIS was filed with the U.S. Environmental Protection Agency (EPA), which published a Notice of Availability of the supplemental draft EIS in the Federal Register (Volume 79, No. 90) on May 9, 2014. Hard copy and CD versions of the supplemental draft EIS were distributed to interested parties and the supplemental draft EIS was posted on the BPA web site (http://efw.bpa.gov/environmental_services/Document_Library/HooperSprings/).

An open house style public meeting was held on May 27, 2014, in Soda Springs, Idaho. Twenty five people from the community attended the meeting.

The comment period for the supplemental draft EIS officially closed on August 7, 2014. A total of 33 comment forms, emails, and letters were received. All comments received during the comment period can be found in Chapter 4 of this document.

1.3 Key Corrections to the Supplemental Draft EIS

The following summarizes the main corrections that have been made to the supplemental draft EIS. For a complete description of all corrections to the supplemental draft EIS, please see Chapter 2 of this final EIS.

- Updated the access road section to include a description of direction of travel routes.
- Updated text to reflect corrections to some impact ratings for visual resources.
- Updated text to reflect corrections in federal protections of wildlife.
- Updated text in cumulative impact analysis related to visual resources.
- Updated Appendix H to reflect corrections to the Avian Collision Risk Model and Marker Plan.

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2 Corrections to the Supplemental Draft EIS

This chapter identifies the specific corrections made to the text of the supplemental draft EIS. Text corrections are organized by the chapters and sections of the supplemental draft EIS. For each correction, the location of the change is identified by page and paragraph number of the supplemental draft EIS. Where text has been corrected, deleted text is indicated in "strikethrough" format and new text is underlined.

2.1 Summary

2.1.1 Visual Resources

Page S-22, first full paragraph has been corrected as follows:

During operation, both the North and South alternatives would appear most visible where the structures cross the skyline or are in viewers' foregrounds, as well as near highways and small populated areas, and across agricultural landscapes. Because the transmission line under the North and South alternatives would be visible along Highway 34, both alternatives would likely have a long-term, ~~***low to***~~ ***moderate*** impact on the landscape in this primarily privately-owned area. In the Wayan area of the North Alternative corridor, short- and long-term impacts to private and federal lands would be ***moderate to high*** because the transmission line would be constructed in a relatively undeveloped and natural setting. On other federal lands along the North Alternative, impacts to visual resources would be ***low*** to ***moderate*** because wood pole structures for a portion of the North Alternative would reduce the line's visibility to some extent and topography may hide portions of the line.

2.2 Proposed Project and Alternatives (Chapter 2)

2.2.1 Access Roads

Page 2-21, following the fifth paragraph, the following paragraph has been added as follows:

Direction of travel routes are identified by the access road engineer during the design process where permanent roads are not needed or allowed. These routes can be identified across existing private roads, fields, agricultural uses, etc. Temporary roads are a subset of direction of travel routes and are typically constructed in areas where a permanent road is not desired but improvements are needed to get equipment across the existing ground. These areas include agricultural fields or wet areas where the ground is too soft to support equipment. All direction of travel routes, both temporary and permanent, would be maintained (as needed) during construction and returned to a condition that meets or exceeds the existing condition with features such as gates, culverts, and fords to remain in place as permanent features along direction of travel routes so that future access to the ROW and structures is possible.

Table 2-6, text has been added after the fifth bullet item as follows:

Table 2-6. Proposed Mitigation Measures for the North Alternative and South Alternative

Proposed Mitigation Measures	Land Use	Recreation	Visual Resources	Vegetation	Geology and Soils	Water Resources, Floodplains, and Wetlands	Wildlife	Fish	Cultural Resources	Socioeconomics	Transportation	Noise	Public Health and Safety	Air Quality	GHG Emissions
▪ Provide a schedule of construction activities, including blasting, to all landowners who could be affected by construction.	X	X										X			
▪ Plan and conduct construction activities to minimize temporary disturbance, displacement of crops, and interference with agricultural activities.	X	X								X					
▪ Ensure that all equipment has standard sound-control devices.							X					X			
▪ Consult with the Farm Service Agency to avoid and mitigate impacts to lands enrolled in the USDA CRP. Avoid access road construction over CRP lands to the extent practical.	X	X													
▪ Coordinate with mine owners along the South Alternative for the placement of towers and roads within proposed mining areas.	X	X													
▪ <u>Develop an agreement with Agrium in which BPA would move the transmission line, at BPA's expense, where it crosses Agrium's mining leases or mine-related facilities if there is a conflict between the transmission line and</u>	<u>X</u>														

Proposed Mitigation Measures	Land Use	Recreation	Visual Resources	Vegetation	Geology and Soils	Water Resources, Floodplains, and Wetlands	Wildlife	Fish	Cultural Resources	Socioeconomics	Transportation	Noise	Public Health and Safety	Air Quality	GHG Emissions
future ore extraction. This would ensure that the ultimate phosphate recovery can be achieved.															
▪ Use BMPs to limit erosion and the spread of invasive and noxious weeds.	X	X		X	X	X	X	X							
▪ Restore compacted cropland soils as close as possible to pre-construction conditions using tillage. Break up compacted soils where necessary by ripping, tilling, or scarifying before seeding.	X	X		X	X										
▪ Remove topsoil from cropland soils in a manner that will allow it to be reused after construction.															

2.3 Affected Environment, Environmental Impacts, and Mitigation Measures (Chapter 3)

2.3.1 Land Use

Page 3-36, text has been added after the seventh bullet item as follows:

- Develop an agreement with Agrium in which BPA would move the transmission line, at BPA's expense, where it crosses Agrium's mining leases or mine-related facilities if there is a conflict between the transmission line and future ore extraction. This would ensure that the ultimate phosphate recovery can be achieved.

2.3.2 Visual Resources

Page 3-66, last paragraph has been corrected as follows:

Initially, the color of the steel structures would be reflective; however, after 2 to 3 years the structures would begin to dull. In the short term, the structures on private land may be more visually obtrusive compared to the wood H-frame structures farther along the North Alternative because of their unnatural color introduced to the landscape. In the long term, the steel structures would more easily blend into the natural setting, although not to the extent of the wood, H-frame structures. The presence of a new transmission line in the North Alternative corridor would initially be a new visual obtrusion on the landscape; however, over time regular motorists and local residents ~~would~~ may become familiar with the transmission line and associate it with the existing landscape.

Page 3-69, the only paragraph has been corrected as follows:

Where the North Alternative parallels Highway 34, it would be in the foreground and may not blend into the background as well as in other places (see Figures 3-7 and 3-8). Since the area is mostly flat and the transmission line would be immediately adjacent to the road, the backdrop of the landscape would likely be the sky, creating a ~~distinct~~ noticeable contrast against the transmission structures. Motorists in this area would mostly include commuters to Soda Springs and the phosphate mining areas and those traveling the scenic byway. The transmission line would likely be visible within this designated scenic area. Although motorists would move through the designated scenic area quickly, impacts to travelers within the area are expected to be ***moderate*** over the long term, as a result of the diminished scenic integrity. In addition to travelers, there are also a number of residences along Highway 34 and other secondary roads in this portion of the North Alternative corridor. For people living in this area, the line would be more visible and would present a new human-made element on the landscape. However, other transmission lines and mining operations also contribute to the landscape in this area of the corridor. ~~Thus,~~ ~~d~~Depending on the viewer, the North Alternative would likely have both short- and long-term ***~~low~~ to moderate*** impacts.

Page 3-81, second paragraph has been corrected as follows:

Similar to the North Alternative, the color of the steel structures would be reflective initially but would dull after 2 to 3 years. The presence of a new transmission line would initially be a visual obtrusion on the landscape, although over time motorists and residents ~~would~~ may become familiar with the transmission line and associate it with the existing landscape.

Page 3-84, second paragraph has been corrected as follows:

The South Alternative corridor would cross lands classified by the C-TNF as Partial Retention at the Blackfoot River Narrows and Modification near the east end of the transmission line corridor. Similar to the North Alternative, the most visible components of the South Alternative would be the 100-foot-wide cleared ROW, the 90-foot tall transmission structures, access roads, and the conductor. Where Blackfoot River Road enters the C-TNF at the Blackfoot River Narrows, the South Alternative would be closer and more visible to viewers, although views this close to the crossing would be brief. East of the entrance sign to the C-TNF, the corridor would make a sharp turn south, cross over Blackfoot River Road and the Blackfoot River, and travel easterly up a forested and open side slope approximately 500 to 600 feet to the top of Dry Ridge (see Figures 3-20 through 3-23). The ROW would be visible as an unvegetated area on the side slope. Additionally, several structures would be seen above adjacent trees silhouetted against the background sky. Based on the limited development in the area and the dominant natural landscape features, the South Alternative would still meet the Partial Retention VQO. Long-term impacts to visual resources are expected to be ***~~low~~ to moderate***.

Page 3-87, the only paragraph has been corrected as follows:

Two of the three BLM parcels crossed by the South Alternative are Class IV, which allow for major modifications to the landscape. Because the Conda area is already heavily disturbed by the presence of the mine and associated facilities, impacts to visual resources on the BLM parcel located near Conda would be ***low***. Visual resource impacts to the other Class IV BLM parcel located along Blackfoot River Road would also be ***low***. While the South Alternative corridor would be visible along the north side of Blackfoot River Road as it travels through rangeland (see Figures 3-24 and 3-25), Class IV areas allow for major modifications to the landscape. Visual resource impacts to the Class III BLM parcel near the Narrows and adjacent to the C-TNF would be the same as the C-TNF lands in this area (long term and ***~~low~~ to moderate***). Class III areas are those lands that should partially retain the existing character of the landscape and where the level of change to the characteristic landscape should be moderate. This classification allows for some visible modifications to the landscape. Because active surface mining is present on this parcel, the addition of a transmission line would not represent a major modification of the landscape.

2.3.3 Wildlife

Page 3-163, last paragraph has been corrected as follows:

Yellow-billed cuckoo—There have been no documented occurrences of yellow-billed cuckoo within approximately ~~2~~50 miles of the project corridor (IDFG 20~~11b~~14) ~~and it is not on the USFWS ESA candidate species list for Caribou County~~. Although listed as threatened on October 3, 2014, the species is not known to occur in Caribou County nor is it listed by USFWS as potentially occurring in Caribou County (USFWS 2014). Little habitat exists for the yellow-billed cuckoo within the corridor for the North Alternative, and no~~ne~~ individuals were observed during wildlife surveys conducted in spring of 2011. Suitable dense willow and willow-dogwood habitat exists for the species along the Blackfoot River crossing on the east side of the corridor for the South Alternative and Option 3A, but ~~none~~ no yellow-billed cuckoos were observed during wildlife surveys conducted in March 2013. This species is documented in Bannock, Bingham, and Bonneville counties, west of Caribou County.

Page 3-176, fourth paragraph has been corrected as follows:

Wolverine—The wolverine has a moderate potential for occurrence within the project area (USFWS 2014). Proposed for listing under the Endangered Species Act as threatened, the USFWS withdrew the proposal on August 13, 2014. Regardless of the formal listing designations, potential impacts to the wolverine are still assessed. A 2001-2008 research team tracked a dispersing male wolverine that crossed all of project alternatives (Inman et al. 2012). This wolverine was tracked making a big loop from the C-TNF southwest to the town of Wayan, southwest to the Fox Hills, along the southern shore of Blackfoot Reservoir, west to the town of Tyhee (north of Pocatello), then northeast back to the C-TNF (Inman et al. 2012). However, this study concluded that wolverines strongly select for areas greater than 8,530 feet in elevation, and typically avoided areas less than 7,054 feet in elevation, including during times with deep snow when other animals are driven to lower elevations (Inman et al. 2012). Other studies and surveys also conclude that wolverines have moderate potential for occurrence within the project area.

Table 3-20 (below) has been corrected to reflect the changes in the text above.

Table 3-20. Special-status Wildlife Species and their Potential to Occur within the Project Area

						Potential for Occurrence		Nature Serve Conservation Status Ranks[6]	
Species	**Federal ESA Status[1]**	**USFS Region 4 (R4) Status[2]**	**BLM Status[3]**	**Idaho Species of Greatest Conservation Need Status[4]**	**Habitat Requirements**	**North Alternative**	**South Alternative**	**Global Ranking**	**State Ranking**
Birds									
Yellow-billed cuckoo	~~C~~ T (not reported in Caribou County)	None	Type 1	PNG	Dense willow understory with mature cottonwoods and generally within 100 meters of slow or standing water (Gaines and Laymon 1984).	Low	Low	G5	S2B
Wolverine	~~PLPT~~ None	S	Type 3	PNG	High mountain forests of dense conifers, primarily in true fir (*Abies* sp.) cover types as well as subarctic-alpine tundra (Groves et al. 1997).	Moderate	Moderate	G4T3	S2

2.3.4 Cumulative Impact Analysis

Page 3-304, second paragraph has been corrected as follows:

Cultural resources in Caribou County have been and are being cumulatively affected because of past and present development activities. Past actions that have impacted cultural resources include agricultural activities, highway and railroad construction, mining operations, construction of transmission lines, and commercial and residential development. Present and ongoing activities that alter the landscape and have the potential to affect cultural resources include agricultural activities, mining and logging operations, and operation and maintenance of existing power lines. Cumulative impacts associated with these activities include disturbance of cultural sites, reduction of the cultural integrity of certain sites, and removal of cultural artifacts. Construction of the North Alternative or South Alternative and all route options could contribute incrementally~~, albeit in a very minor way,~~ to these cumulative impacts.

2.4 Appendix G Wildlife Special Status Species

Page G-2, second paragraph has been corrected as follows:

2.4.1 Yellow-billed Cuckoo (*Coccyzus americanus occidentalis*)

The yellow-billed cuckoo is an ~~candidate species under the~~ ESA-listed threatened species, but is not reported as ~~present~~ potentially occurring in Caribou County by USFWS. It is also a BLM Type 1 special-status species and an IDFG Species of Greatest Conservation Need protected non-game species. In the west, yellow-billed cuckoos prefer sites with a dense understory of willow (*Salix* spp.) combined with mature cottonwoods (*Populus* spp.), generally within approximately 328 feet of slow or standing water (Gaines and Laymon 1984). The yellow-billed cuckoo is also known to use non-riparian, dense vegetation such as wooded parks, cemeteries, farmsteads, tree islands, Great Basin shrub-steppe, and high-elevation willow thickets (DeGraff et al. 1991).

Page G-4, first paragraph has been corrected as follows:

2.4.2 Wolverine (*Gulo gulo*)

The wolverine is ~~a federally proposed species for listing in Caribou County under the ESA. It is also~~ listed as a USFS sensitive species, a BLM Type 3 special-status species, and an IDFG Species of Greatest Conservation Need protected non-game species. Wolverines inhabit high mountain forests of dense conifers, primarily in true fir (*Abies* sp.) cover types as well as subarctic-alpine tundra. Lack of human disturbance is an important component of wolverine habitat (Groves et al. 1997). They are solitary animals, with females requiring approximately 148 square miles of land for a single territory, and males requiring up to 610 square miles (Groves et al. 1997). Wolverines seasonally move between higher and lower elevation areas in search of food. Wolverines

prefer subalpine rock and scree habitats with boulders and wood debris for denning (Krebs and Lewis 1999).

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3 Comments and Responses to the Supplemental Draft EIS

This chapter presents comments received on the supplemental draft EIS, and BPA's responses to these comments.

BPA catalogued a total of 178 comments received on the supplemental draft EIS. Comments were submitted at the May 27, 2014, draft EIS public meeting, and in comment forms, emails, and letters received during the supplemental draft EIS public comment period. Comments were received from state and local agencies, special interest groups as well as private citizens living in Caribou County.

Comments were primarily made on Chapters 2 and 3 of the supplemental draft EIS. Chapter 2, Proposed Project and Alternatives, received about 54 percent of the comments with most comments focused on alternative routes, the preferred alternative, and easements and land. Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures, received about 28 percent of the comments. Most comments focused on wildlife, visuals, cultural resources, public health and safety, and land use; however comments were also received on recreation, socioeconomics, and cumulative impacts. Comments on chapters 1 and 4, the appendices, and miscellaneous comments comprised the remaining 18 percent.

Comments were designated with an identifying number based on the order in which the letter, e-mail, or other item of correspondence was received. Comments, and responses to each comment, are organized by chapter/section generally in accordance with the table of contents of the supplemental draft EIS. All references to chapters and/or sections in the responses refer to the supplemental draft EIS (Volumes 1, 2, or 3).

The letters, e-mails, and forms received on the supplemental draft EIS, as well as the supplemental draft EIS public meeting comments, are provided in their entirety at the end of this chapter.

3.1 Purpose of and Need for Action (Chapter 1)

Comment: *Please have your studies look at generating power closer to the areas in need, Smaller and more localized. The national grid is subject to major failure all over the country. The technology is already available. (HSTP214_0002)*

Response: The possible development of new generation at or near the load centers as an alternative to the proposed transmission line was studied extensively early in the NEPA process. As described in Volume 1, Section 2.5.6, Non-Wires Alternative, development of local area generation as an alternative is not feasible from a practical perspective. Please see Volume 1, Section 2.5.6, Non-Wires Alternative, for more information on the study and consideration of this issue.

Comment: *This proposed line is a bandaid that does not adress [sic] the problem. Don't build it. (HSTP214_0002)*

Response: BPA believes that the proposed line is an appropriate long-term solution that addresses the need identified in Volume 1, Section 1, Purpose of and Need for Action of the supplemental draft EIS. As discussed in that section, one of the primary issues in the southeastern Idaho service area related to reliability is that the entire load is currently served from one substation (Goshen Substation). The two main source lines into the area are also in the same utility ROW for more than 20 miles. Both of these factors leave the region susceptible to loss of the entire load if a single event such as a brush fire or a lightning strike were to occur. The proposed transmission line would provide a second source line into the area that would be able to support a portion of the load during a catastrophic event.

Comment: *We recognize the reliability issues that are enforced by WECC, which has specifically stated that local shedding cannot be the only solution and that a permanent long-term solution is needed to address reliability concerns. However, a permanent, long-term solution does not mean that it has to be selected as soon as possible, only that a well-thought out plan should be in place in a timely manner. (HSTP214_0030)*

Response: Comment noted.

Comment: *The meeting held at the Tigert Middle School in Soda Springs on May 27, 2014 was very informative. We do appreciate your time and effort in setting up this public meeting. (HSPT214_007)*

Response: Thank you. Comment noted.

3.2 Proposed Project and Alternatives (Chapter 2)

Comment: *That is not to say that there isn't some degree of urgency here or that the Non-Wires Alternative should be the automatic conclusion of this analysis. But BPA has a responsibility under NEPA to develop a range of reasonable alternatives. It is critical to analyze a range of alternatives, especially when the majority of alternatives require substantial linear infrastructure, and permanent, irreversible impacts. The Non-Wires Alternative is particularly important for the BPA to consider because of the significantly reduced cost to implement, the avoidance of environmental impacts, and the potential to site any new infrastructure within the footprint of existing industrial facilities. (HSTP214_0030)*

Response: As discussed in Volume 1, Chapter 2 of the supplemental draft EIS, and Section 3.2.9 below, BPA rigorously explored and objectively evaluated a full range of reasonable alternatives for its Proposed Action. Alternatives considered in detail are discussed in Sections 2.2 through 2.4 of Volume 1 and alternatives considered but eliminated from detailed study are

discussed in Volume 1, Section 2.5. As explained in Volume 1, Section 2.5.6, Non-Wires Alternative, potential non-wires alternatives were eliminated from further detailed consideration because they could at most defer, but not eliminate, the need to construct a transmission line. Even if non-wires alternatives were achievable, they would not be a permanent solution to the reliability need of a second source transmission line into the area.

3.2.1 South Alternative

Comment: *I would like to suggest that you consider and choose the South option or Option 1 that goes along the Monsanto haul road. Monsanto has graciously said that they would work with BPA. (HSTP214_0024)*

Comment: *However, "Option 1" from Hooper Springs Substation going east to Conda and then north to "mile post 11" along the "Monsanto haul road right of way" could be acceptable, for several reasons. In conversing with Monsanto officials, we believe they could be a co-operative asset for BPA. This would satisfy Caribou County since it would place the proposed power line in an already industrialized location. The hard surfaced haul road in close proximity to the proposed power line would seem to be a great convenience to BPA in times of service or maintenance during we weather or soft soil seasons. This route is likely to meet with but a small amount of resistance and concern opposed to that which is involved with "option 3" that goes north from the Hooper Springs Substation, since "option 1" goes through and disturbs a much smaller amount of private property. (HSTP214_0022)*

Comment: *On the other hand, I believe that the original South Alternative or Option 1 minimizes negative impacts. By following those routes, the new power lines would travel near other lines that already disturb that immediate area. The lines would travel in a route already impacted by industry. In the area of concern near Monsanto's Blackfoot Bridge Mine, I know from public comments made by Monsanto leadership that Monsanto is willing to cooperate in any way they can to enable passage of the power line. I'm confident that if BPA worked with Monsanto a solution to that area of concern could be found. (HSTP214_0016)*

Comment: *One thing I'm still interested in, and by the way I do highly prefer the south alternative, but can you explain to me what all it is that is stopping you from following the Monsanto Haul Road into Conda and staying over out of sight and off of Agrium ground? (HSTP214_0004)*

Comment: *Please work with Monsanto and have it put up in the haul road. (HSTP214_0005)*

Comment: *I've been sitting on the sidelines thinking you all would come to the conclusion to take that power line down the haul road. the most sensible way to go. Now it looks like I need to come and say it. TAKE IT TO THE HAUL ROAD!!!!!!!!! We live and work out there and I have all my life. If it takes please, You got it. I'll do what ever it takes to keep you from ruining our view out there. I hope you will make the sensible choice and move it. -- thanks for your cooperation. (HSTP214_0006)*

Comment: *Our preference from the very beginning of Bonneville Power taking over for Lower Valley Energy was to have them follow the same general route on the haul road. This keeps the line out of sight, does not encumber the farm land and is not a safety issue for the public. (HSTP214_0007)*

Comment: *It has also come to my attention that Monsanto has agreed to let you guys run your power line along with theirs to run down to the Meadowville sub-station. I do know that going down through the China Hat area is probably cheaper to run the power line in a straight line and won't be so costly as to run it along with Monsanto's. With that said there is still easy access with Monsanto's line and it is probably a little longer route but it keeps it out of the farmers way and we don't want a big old power line or pole sticking out in the middle of a nice field planted with wheat or barley or even alfalfa. (HSTP214_0008)*

Comment: *We are very much against putting this line down highway 34. We think it should go down the Haul Road. (HSTP214_0009)*

Comment: *Again, I encourage you and the BPA team to collaborate with Monsanto in the routing of the power line and preserve the beauty along Hwy. 34. It would be much appreciated by our community, distant, and future generations. (HSTP214_0011)*

Comment: *For these reasons, I urge you to sincerely consider favoring the original South Alternative or Option 1. Doing so would have far less negative consequences that my family, others in the area and travelers through the area will have to deal with for many years to come. I also believe that routing through a more industrial area (original South Alternative) could reduce cost as opposed to negotiating with a number of farmers who like me are less than enthusiastic about having the power lines on our land. (HSTP214_0016)*

Comment: *If Bonneville Power administration (BPA)'s proposed "Hooper Springs Power Line Project" continues to be a viable project, Caribou County as your co-ordinating partner agrees with the "south alternative" route along the Blackfoot River and skirting the reclaimed mines as the preferred alternative. (HSTP214_0022)*

Comment: *Caribou County is committed to our role as a co-ordinating partner with BPA in the Hooper springs Transmission Project and developing the least obstructive, least disruptive, yet viable and beneficial power line route that will serve the needs of energy users. If Caribou county were to create a designated power line corridor, which Idaho State law provides the authority to do, this is the corridor we would authorize; from Hooper Springs Substation on "option 1" east to Conda then north on the "Monsanto haul road right of way" to mile marker 11, then east on the south preferred alternative to the connection facility at the Lanes Creek road. (HSTP214_0022)*

Comment: *I am asking that you please consider the Monsanto haul road route. (HSTP214_0025)*

Comment: *Does Monsanto have any issues with the line going that way? (HSTP214_0004)*

Comment: *Please listen to the farmers who's land will be greatly affected by the proposed BPA Transmissions Line, the Towers, and the Right-of-ways starting at the Threemile Knoll*

Substation. Why do you think Farmers oppose power lines going through their property? As I have verbally said before If Monsanto has voiced that a better route would be to run the power poles along their haul road why wouldn't the BPA be in agreement. Rethink your route and take Jim Smith serious!! (HSTP214 0027)

Comment: *I DO NOT want power poles & your Right-of-Aways on my property. Please choose the haul road. (HSTP214 0027)*

Comment: *BPA, Please agree with our County Commissioners and support all comments that the "South Route" is the most feasible Route to place power lines. (HSTP214 0029)*

Comment: *I don't know what all you require to have it so that it's acceptable to go across that, but it sure looks like somebody had the right idea when they had that line going over to Conda. (HSTP214_0004)*

Comment: *However, from the research that is presented in the majority of the comments listed on your website, it appears that Option #1 (the southern route) will be a much safer, cheaper, and, perhaps, the only possible solution. (HSTP214_0028)*

Comment: *With a goal of reducing negative impacts of the alternatives, I suggest selecting the South Alternative, Option #1. Simply put, Option #1 traversing a proposed route from Hooper Springs substation eastward to near Conda, northward near or following the Monsanto Haul Road along the west side of Woodall Mountain to the junction of the Blackfoot River (mile #11) and eastward could significantly reduce impacts upon owners of agricultural lands compared to options 3 and 3A, greatly minimize impacts on migratory birds (especially cranes and waterfowl) that traditionally use the area east and south of Blackfoot Reservoir, and avoid impacts upon scenic and recreational values along state highway 34, with the powerline situated on the eastside hills. Your review of these subjects appears to be incomplete and superficial. Why would you suggest Options 3 and 3A knowing your proposed powerline would negatively impact and materially inconvenience agricultural landowners, negatively impact migratory birds protected by the Migratory Bird Treaty Act of 1918, and disregard values associated with scenic byway Highway 34. (HSTP214 0019)*

Comment: *The major plus in taking option 1 is: 1. It is a safer option where you won't have a lot of farmers with high voltage wires in their fields to contend with. 2. It won't disturb a scenic hwy and will leave a beautiful view of our area. 3. May be more cost effective since you won't have to make deals with several farmers who really don't want the line on their property. (HSTP214_0024)*

Comment: *That would be in an area that Monsanto would mine I assume? (HSTP214_0004)*

Comment: *Also, Commissioner Somsen and Jim Smith from Monsanto have alternative options. It is our hope that a route can be agreed upon which will not impact private property owners, decreasing property values and threatening the safety of farm families. (HSTP214_0010)*

Comment: *Monsanto, Jim Smith, seemed very willing to work with Bonneville Power to accomplish the haul road route. It appears that with Monsanto and Bonneville Power working together that all would benefit. (HSTP214_0007)*

Comment: *I understand the line is a necessity and the benefits of it, but what I do not understand is the route in which it's being placed. According to Soda Springs mayor, Jim Smith, Monsanto is willing to work with you in running the power line along the Monsanto haul road. A more than viable solution. (HSTP214 0011)*

Response: The preference of the commenters for either the South Alternative or Option 1 is noted. As described in Volume 1, Section 1, Purpose and Need, BPA's need for the Hooper Springs Transmission Project includes improving the stability and reliability of the transmission system in southeastern Idaho. In addition, a primary purpose identified in that section is to maintain the reliability of BPA's transmission system to BPA and industry standards. In part with that purpose and need in mind, BPA has identified Option 3A as its preferred alternative. Conversely, the South Alternative and Option 1 present significant challenges to fully meeting that purpose and need for the Project because of issues with locating the proposed transmission line in the Conda and Blackfoot Bridge Mine Areas. The following describes these issues for each of these areas.

Conda Area

- **Active mining**—The routes for the South Alternative and Option 1 pass through an active mining area. Placing a transmission line within an active mining area would mean that access to the line is not available at all times. The haul road would likely be actively used. BPA requires year-round access to its structures and lines in the event of an emergency. Additionally, placement of a transmission line in an active mine area would present problems during maintenance and emergency situations that would compromise the overall system reliability.
- **Possible soil contamination**—Regarding the Conda Mine Study Area, as discussed in Volume 1, Section 2.1, BPA seeks to avoid construction, operation, and maintenance of a transmission line in areas of known contamination and to avoid direct contact with waste dumps, seeps, or mine pits. For this reason, Options 3 and 3A were proposed because they avoided the Conda Mine Study Area.
- **Safety**—The safety of not only the mine workers but also of the transmission line maintenance workers could be impacted if the two activities are being conducted at the same time.
- **Limited space for the transmission line**—There is approximately 170 feet between a large settling pond at Conda and the railroad tracks south of Conda Road. This leaves insufficient room to route a transmission line, including placement of access roads.
- **Railroad crossings**—The transmission line would cross the railroad twice in this area. Access to the transmission line also would be difficult if the railroad is in use when line maintenance needs to occur, potentially compromising system reliability.

Blackfoot Bridge Mine Area

- **Blackfoot Bridge Mine**—The mine is active with excavation occurring throughout the area. Structures in the 138-kV line that cross through the Blackfoot Bridge Mine have already had excavation occur around their bases (see Photo 1). As noted above, placing a transmission line within an active mine area does not meet the purpose of maintaining system reliability.
- **Fish Pond area between the haul road and the railroad**—Routing the preferred alternative through this area is similar to the limited space available for the line in Conda. The South Alternative would cross through an area that is about 200-feet wide between the haul road and the railroad.
- **Triple-circuit transmission line**—To use the South Alternative or Option 1 route, BPA would be required to construct a triple-circuit line (two 115-kV circuits for BPA and one 138-kV circuit for Rocky Mountain Power). Structures would likely be 130 to 180 feet tall (proposed structures for the Option 3A would be 55 to 120 feet tall depending on location). Furthermore, Rocky Mountain Power has indicated that there is not sufficient room for an entirely new line in this area.
- **Monsanto Haul Road**—This haul road has many restrictions on use. If the line was routed along the haul road and BPA proposed to use portions of the road to access the line, conflicts in the use of the road would occur. Presently the haul road is closed to external use with 24-hour notice required for use. This would not allow year-round access to the BPA transmission line, especially if there was an emergency.

Photo 1. Rocky Mountain Power 138-kV structure within the Blackfoot Bridge Mine area

Comment: *Have you got any kind of an idea what it would be to have it so both lines could be on one pole? (HSTP214_0004)*

Comment: *The only areas where there was any kind of issue at all was coming right through the mine. We have power line that comes through there with Rocky Mountain Power and we worked out an agreement with them to put that on the same line and locate it in places where it wouldn't impact the Monsanto line. (HSTP214_0004)*

Comment: *Is that the size that would be needed out there or what size are you talking? Taller than that, having both power company transmission lines together? (HSTP214_0004)*

Comment: *Is there no way that you could parallel that line and stay where you need to be? Is there enough for another line if there's one already going through it? (HSTP214_0004)*

Comment: *That's why that Rocky Mountain Power line goes through there is because it's up on a hill and avoids the farm land more. That's a good idea, go farther up the hill. (HSTP214_0004)*

Comment: *My only proposal is to encourage Bonneville Power to use their considerable negotiating skills to work with Monsanto & Agrium about the placement of new poles along a route that already has poles. Or perhaps somewhere in the back country that would not encroach upon the scenic by way or our little community of China Hat. (HSTP214_0001)*

Comment: *Are there any others up the valley that would interfere with a power line? (HSTP214_0004)*

Comment: *I guess what I'm trying to understand, if you have—I know it might have worked at the very beginning, but we're not at the beginning, so now that your guy's lines are going through there is it still viable to put their lines through there or it just too expensive and we need to be out in the valley? (HSTP214_0004)*

Comment: *So it would be a lot more complicated, but still theoretically doable? (HSTP214_0004)*

Comment: *Back to the towers. You folks have been around those quite a bit. Have you got kind of a ballpark idea what it costs for one of those towers, the tall ones? (HSTP214_0004)*

Comment: *And what did you say it was? – So 90 to a hundred thousand dollars a tower?—How many of them got across? -- Do you remember how many poles there were? (HSTP214_0004)*

Comment: *I can sympathize with that. Those are justified statements. I'm thinking, though, the price of the poles may be pretty much equaled out from what you wouldn't have to pay for easements to get across a lot of the properties. I don't know. I don't know how much you figure on paying folks that you power line goes through. Even if that was $300,000 for those two poles, I'll bet you it comes pretty close to what you'll have to pay for easements to get across there. Just a guess. (HSTP214_0004)*

Response: The above comments address the design requirements and costs of transmission towers that would be required for the portion of the South Alternative and Option 1 that would pass through the Blackfoot Bridge Mine Area. As discussed in the preceding response, BPA would be required to construct a triple-circuit line (two 115-kV circuits for BPA and one 138-kV circuit for Rocky Mountain Power) for this portion of the South Alternative or Option 1. Structures would likely be 130 to 180 feet tall, as compared to structures for the other route alignments that would be 55 to 120 feet tall depending on location. BPA does not have specific cost estimates for these types of taller structures, but as noted in Volume 1, Table 2-1, the overall construction cost estimates for the South Alternative and Option 1 would be about the same as for Option 3A.

Comment: *I haven't studied the map, but all of the lines on the southern route could all come together more or less. In what proximity to the river and the roads? (HSTP214_0004)*

Response: The South Alternative and Options 1, 2, and 4 all cross the Blackfoot River in the same location east of Highway 34 (see Map 1-1). Options 3 and 3A cross the river to the west closer to the Blackfoot Reservoir. The routes of South Alternative and its five options are described in Volume 1, Section 2.3.2, Transmission Lines.

Comment: *I understand that that is fraught with problems going across wetlands no matter what you do. Is there no way you could go across higher ground and not go across the bottoms and still follow that east side of the valley? Do you have to go down in to the wetlands I guess is what I'm asking? I'm not sure where that map is showing. Okay. Along through here, yes. Option one, I guess, basically following from over here and coming across and avoiding all the agricultural land. That's a huge issue for the farmers who are going to be stuck with those poles in their field because they'll have to farm around those from now on (HSTP214_0004)*

Response: The commenter is referring to Option 4 which would cross through the Woodall Springs wetland complex before joining the same corridor as the South Alternative and Option 1. As described in Volume 1, Section 3.6, Water Resources, Floodplains, and Wetlands, Option 4 crosses about 14 acres of wetlands known as Woodall Springs. In this area, Option 4 could result in both short- and long-term moderate to high impacts to wetland and surface water resources. While this wetland area has been disturbed by various activities, including mining, the wetlands still provide water quality and habitat function. Additionally, compliance with Executive Order 11990 - Protection of Wetlands, requires agencies to avoid the destruction or modification of wetlands if there is a practicable alternative to locating the line within a wetland.

3.2.2 North Alternative

Comment: *The "North alternative" would be unacceptable to Caribou County. This is because of the many and much discussed issues already presented by testimonies and other*

means concerning environmental, aesthetical, property damage and various other issues. (HSTP214_0022)

Comment: *My family and I have farm ground that would be affected with the northern route. My family, as well as the other farmers affected with this route rely on that farm ground to make a living. Putting power poles takes away ground and puts one more thing we have to worry about going around. It also affects our gps signal every time we have to go under the wires. (HSTP214_0025)*

Comment: *Respect the Farmers and Rancher's land, the Migratory Waterfowl Flyways and the Beautiful Country Scenery that God gave to us to enjoy for many generations to come. Please stop the discontent of all those involved with the North Route and let us have the peace of mind knowing our land won't be affected with power poles!!! (HSTP214_0029)*

Response: Comment noted. Volume 1, Chapter 3 analyzes the impact of the proposed Northern Alternative on various resources, including those raised by the commenters.

3.2.3 Easements and Land

Comment: *And there is another issue too, that once they're on there, as I understand it, it becomes the landowner's responsibility if they happen to damage the poles or anything. (HSTP214_0004)*

Response: It is BPA's practice to work with landowners to minimize the impacts from transmission line structures. If the structures are damaged, BPA would consult with the landowner to determine what happened and work toward resolution of the situation.

Comment: *You'll be buying easements, potentially, from the people in the valley. What are the—what kind of constraints—once this is built, do you envision any constraints on what they can do, because it's a pretty wide thing you want to put in there? (HSTP214_0004)*

Comment: *I need more information about how much disturbance from giving an easement. Why the line cannot be put on the fence line. (HSTP214_0038)*

Response: As described in Volume 1, Section 2.3.2, Easements and Land, and Section 3.1, Land Use, BPA works with landowners to determine land uses that are compatible with the transmission line. BPA also requests that landowners keep the area around the base of each structure clear except for low-growing vegetation. Typically, BPA allows agricultural activities such as grazing and dryland crops along its ROWs.

Transmission lines are usually not placed on fence lines because access for maintenance is more difficult and higher costs result from purchasing additional easements.

Comment: *So we can have cows and grow barley?—If we have a crop of barley and you want to drive through it, we're just SOL? (HSTP214_0004)*

Response: As described above and in Volume 1, Section 3.1, Land Use, grazing and dryland crops are uses that are considered compatible with a transmission line ROW. As described in Section 3.10.4, Mitigation, BPA would compensate landowners for any damage to crops or property during construction or operation and maintenance activities, as appropriate.

Comment: *Our suggestion to consider along our south fence line with poles was just that "a suggestion" to keep the poles out of the middle of our field and away from out front entrance to the horse barn. (HSTP214_0001)*

Response: Comment noted. As described above, BPA works with landowners to determine land uses that are compatible with the transmission line.

Comment: *I've got a question about compensation. You mentioned that you're starting the appraisal process; you're making offers to landowners. I know that eventually, if a landowner is not willing to see you an easement, that you can take an easement through the eminent domain process. If a landowner chooses not to accept your offer and you pursue the legal process to take the land through eminent domain, at that point how do you determine the value of the offer to the landowner? I'm guessing you probably don't go back to that original offer you made. How does that process work? (HSTP214_0004)*

Comment: *So let me oversimplify, but to make sure I'm right, where you start the process you start with a fair market value, but you have the ability to negotiate and sweeten the deal for the landowner if you think it's appropriate?—If that doesn't work and you go to the condemnation process, and the Department of Justice comes in, they'll start either with the original fair market value appraisal or they can get another one. The question is, at that point the DOJ still has some flexibility to negotiate with the landowner before they actually condemn the property? (HSTP214_0004)*

Response: As discussed in Volume 2, eminent domain is a last resort for BPA. BPA's preference is to work with landowners to come to an agreement on the price of an easement.

If BPA makes the decision to construct the transmission line, an appraisal of the property would be prepared. The appraisal and resultant offer to the landowner would be based on the fair market value of the property. If the landowner is not in agreement with the appraisal and offer, BPA would make every effort to work with the landowner to reach a mutually agreeable solution. If an agreement cannot be reached, eminent domain proceedings could begin. Because the U.S. Department of Justice (DOJ) is responsible for undertaking such proceedings, BPA would be removed from the process at that point. At any time during this process, the landowner has the right to obtain an appraisal and present it to DOJ. If the landowner's appraisal is justified, DOJ may reevaluate the first appraisal. At this point, DOJ has some flexibility to negotiate with the landowner before condemnation occurs.

Comment: *You probably can't answer this question, but I'll ask it anyway. I'm trying to determine whether or not there's any advantage for the landowner to accept some sort of a deal upfront before they go into the condemnation process. What I'm hearing from you is not necessarily, because there's still some opportunity to negotiate with the Department of Justice and it's not necessarily to the landowner's advantage to accept the offer from you guys initially and not let it go to condemnation. (HSTP214_0004)*

Comment: *So what I'm hearing from you is that rather than going to the condemnation process, you'll do everything that you can, that you believe is reasonable, to try to come to an agreement with the landowner and you'll make essentially your best offer? (HSTP214_0004)*

Response: As discussed above, it is BPA's preference to work with landowners to come to an agreement on the price of an easement.

Comment: *At the May 27th public meeting, we specifically questioned the right-of-way procedure that BPA would be using for the project. We were told that Bonneville's surveying and mapping would be butting a 100' easement against the railroad track right-of-way. This would eliminate voids or gaps between the two right-of-ways or easements. However, given the staking and test drilling that has since been done, the poles for the line are being moved further into the Carter property. Of course this creates more waste of land and disruption to the ranch. (HSTP214_0014)*

Response: The 115-kV transmission line would have a 100-foot ROW with the structures placed in the middle of the ROW. Additional ROW would be acquired to close the gap between the transmission line ROW and the railroad ROW.

As described above, land use under the transmission line could return to its original use of farming or grazing.

Comment: *In my opinion, any money received in compensation would not at all balance out the negative consequences of the power line. (HSTP214_0016)*

Response: Comment noted.

Comment: *All the routes being considered by BPA cross private property. We believe that it is very important for BPA to work carefully with private land owners to address concerns regardless of the ultimate route chosen. (HSTP214_0020)*

Response: Comment noted.

Comment: *It is our opinion that Idaho has acres of state and government property through which this line could pass. (HSTP214_0010)*

Comment: *The issue with the power lines running close to or through land owners property is a concern. These lines running through farmers personal property and defacing their property and possibly putting them in danger is a concern. I believe it would be in the best interest of the utility company to find another way to run the power lines on state land rather than personal property. (HSTP214 0026)*

Response: Comments noted. In developing routing alternatives for the proposed transmission line, BPA considered the potential location of the line on state land rather than private property where appropriate. For example, the North Alternative would locate a portion of the line on state land as an alternative to locating this portion of the line on private property under the Long Valley Road Option (see Volume 1, Section 2.2.2).

Comment: *We feel that we have been misled about the problems of putting the line along highway 34. We were told it would run along the present fence line and more or less be a small upgrade to the existing line. Now we find a 100 feet easement is required and it would set at least 50 feet into the field. That would be 71/2 acres of our property and would ruin the frontage. (HSTP214_0009)*

Response: As described in Volume 1, Section 2.3.1, Easement and Land, Option 3A would require a 100-foot-wide ROW. In the area described by the commenter, there currently is no existing transmission line. The proposed line would be placed along the fence line so that the centerline is 50 feet from the edge of the state highway ROW (see discussion below regarding placing a transmission line ROW within an existing road ROW). Visual impacts associated with Option 3A are discussed in Volume 1, Section 3.3, Visual Resources. As described above, land use under the transmission line could return to its original use of farming or grazing.

Comment: *Can you explain the rules that govern how close you can locate the poles to, say, a county road or a state highway? –Then within you right-of-way, how close to the edge of your right-of-way are you able to locate a pole? Just down the center? (HSTP214_0004)*

Response: BPA avoids siting transmission line ROWs within existing county or state highway road ROWs. Placing a transmission line ROW within an existing road ROW means that if the road or road ROW requires expansion in the future, BPA would need to move the transmission line. Additionally, motorist safety is a concern of both BPA and the highway or road agency. By avoiding the siting of transmission line ROWs within existing county or state highway road ROWs, BPA decreases the likelihood of vehicle collisions with BPA's transmission facilities.

Nonetheless, BPA does make every effort to abut its transmission line ROWs with existing road ROWs so that portions of the underlying property are not stranded. BPA designs its ROWs so that the transmission line structures are in the center of the ROW. For this Project, the transmission line ROW would be 100-feet wide with 50 feet on each side of the center of the structures. The width needed for the transmission line ROW is intended to ensure that the transmission line is a safe distance from other objects and structures, such as trees and buildings.

Comment: *Additionally GYC would encourage a transmission alignment that creates the least amount of new auxiliary, construction, and supporting infrastructure. The use of existing road and transmission corridors will minimize the potential adverse impacts on waters resources, terrestrial and avian species along with the disruptions to the ranching operations along the final route. Disruptions to ranch operation include crossing productive fields and interfering with optimal planting, irrigation and harvest practices. (HSTP214_0023)*

Response: Comment noted. As described in Volume 1, Section 2.2.4, Access Roads, it is BPA's practice to incorporate existing roads into the transmission line access road system wherever possible. BPA also makes use of temporary roads in areas where a permanent road is not desired. These areas include agricultural fields or wet areas where the ground is too soft to support equipment.

BPA also considers the use of existing transmission lion ROW when it is available. However, there are no existing transmission line ROWs that run between the proposed Hooper Springs Substation and LVE's transmission system on the east side of the Project.

Construction related impacts would result in the temporary disruption of grazing and agricultural use on private lands as described in Volume 1, Section 3.1, Land Use. Mitigation measures described in Section 3.1.4 would reduce impacts to these activities during construction and operation of the transmission line and access roads.

3.2.4 Access Roads

Comment: *Another area of substantial concern to us is the extensive amount of roads that have been flagged and drawn in the area and valley above or North and East of the homestead. These roads extend far from the Transmission line right-of-way and go above and around the spring that gives water to the Carter house and provides water for cattle and wildlife. New roads in the valley of this spring are going to change the lay of the land, alter the current controls we have with cattle in this area, and create great potential for damage to the spring and environment around the spring. We do not understand why any roads or other permanent activity needs to occur in the valley of the spring when there are obviously other access routes and options to the two poles that suspend the wires across this valley. Some of the problems could be minimized if these poles and access were placed lower on the mountain and within a right-of-way as discussed earlier. (HSTP214_0014)*

Response: Access roads above the Carter homestead would follow existing roads to minimize impacts. The existing roads follow the natural contours of the land and have reasonable grades that would easily be traversed. These roads appear to be well established and have been in place for some time. If new roads were constructed directly between structures, there would be impacts on the hillsides because the road would require switchbacks and large cuts to make the appropriate grade. If the access was changed to structures 15/5 and 15/6 to come from the east, a new drainage crossing would need to be constructed. A new crossing of this drainage would require subgrade stabilization and a culvert that would likely impact wetlands in the area.

Comment: *BPA should consider using short, spur roads to access each tower instead of a single road along the ROW if the combined effects are lesser. Mitigation for access roads could be reduced road densities in the surrounding area. This would help reduce illegal OHV use, sediment delivery to streams, wildlife disturbance and noxious weed expansion. (HSTP214_0030)*

Response: BPA does consider the use of spur roads to structures where possible. However, where the transmission line would parallel Blackfoot River Road in line miles 14 to 17, a railroad is located between the road and proposed ROW. Crossing railroad tracks in numerous places would make access to the line difficult during times when the tracks are in use. Without access to the transmission line, reliability in the event of an emergency is not assured. For the structures in line miles 7 to 10, access roads running along the ROW would be constructed to utilize existing approaches off Highway 34. Adding additional approaches for spur roads at each structure would require additional ground disturbance and would be a safety concern along the highway.

Additionally, as noted above, BPA does incorporate existing roads into the transmission line access road system wherever possible. BPA also incorporates the use of "direction of travel" routes. Direction of travel routes are used by the transmission line contractor or BPA maintenance crews to access structures without doing any permanent road work (although the routes can be permanent). Temporary roads are specified in locations where improvements (fixing soft spots, adding gravel, re-grading, etc.) are required but permanent roads are not desired. These improvements would be removed, and the land restored to its original condition, following transmission line construction (see Chapter 2, Section 2.1.1, Access Roads, for additional information on direction of travel routes).

Volume 1, Section 3.11, Transportation, describes BPA's proposed measures to decrease the potential for unauthorized public access and use, which in turn would reduce the potential for impacts to streams, wildlife, and noxious weed expansion. Unauthorized off-highway vehicle (OHV) access to C-TNF, BLM, or state lands would be reduced by adding heavy duty gates at strategic locations. Gates also would be installed if requested by private landowners. Use of "direction of travel" routes also would reduce OHV use because no road would exist in the long term.

3.2.5 Construction Schedule

Comment: *What is your projected start date if everything goes well? (HSTP214_0004)*

Response: BPA expects to issue a record of decision in early 2015 that will explain its decision about whether to build the Project and, if so, the alternative selected. If a decision is made to proceed with the Project, construction activities could begin by mid-2015.

3.2.6 Maintenance

Comment: *DEQ also will look to long term management to avoid and reduce impacts to water bodies affected by this action. Sediment input to streams and other water bodies is our primary concern. Facilities associated with the project will need to be designed and constructed to avoid and minimize sediment impacts to surface waters during construction and throughout the life of the project. Additionally, where transmission lines cross live streams, vegetation adequate for shading these waters needs to be preserved to prevent thermal impacts. (HSTP214_0021)*

Response: Comment noted. BPA would continue to coordinate with Idaho DEQ as applicable to address any concerns about water quality standards throughout the life of the proposed transmission line. Concerning crossings of streams by the transmission line, as described in Volume 1, Section 2.2.5, Vegetation Clearing, and Volume 2, Vegetation Clearing, all tall-growing vegetation would be removed from the transmission line ROW. When vegetation grows or falls close to a transmission line it can cause an electrical arc that can start a fire, cause an outage of the line, or injure or kill someone. Tall vegetation cannot be allowed to grow within the 100-foot transmission line ROW. Section 3.6.4 describes mitigation measures that would be implemented throughout the project corridor to reduce possible impacts on water quality, especially where tall-growing vegetation would be removed.

3.2.7 Estimated Cost

Comment: *In addition, the analysis should provide an estimate of the costs to mitigate for the various impacts of each route in order to accurately compare the relative costs of different routes. (HSTP214_0030)*

Response: While NEPA requires agencies to identify relevant and reasonable mitigation measures to avoid, minimize, or compensate for impacts of its proposed action, analyzing the cost of mitigation is not required.

3.2.8 No Action Alternative

Comment: *There's one option that you guys had earlier in this process three or four years ago. I haven't heard much of it since. This is mostly a shuttle line and you did have the option of not building it. I think that's the best option you've got. – As far as I'm concerned, that's a kind of band-aid on the deal anyway. (HSTP214_0004)*

Response: Comment noted. The No Action alternative is included in the EIS. Volume 1, Section 2.4 describes the No Action alternative, and this alternative is analyzed in the various resource sections in Chapter 3 of Volume 1.

Comment: *We have only addressed a few of the concerns and issues that the Carter Family feel this project will bring to them as problems. The Carter Ranch has operated and practiced conservation in preserving and improving the ecological surroundings on the ranch and now Bonneville power wants to change a way of life and a natural environment that has existed for years. It is our sincere hope that in the end Bonneville Power Administration elects not to build this proposed project. (HSTP214_0014)*

Response: Comment noted.

Comment: *We believe any of these routes would be preferable to the No Action alternative. Simplot does not support the No Action Alternative. (HSTP214_0020)*

Response: Comment noted.

3.2.9 Non-Wires Alternative

Comment: *We believe that BPA's top priority should be to avoid environmental impacts as possible, and then to minimize and mitigate these impacts if they cannot be avoided. We believe that the best way to avoid impacts is to further develop Non-Wires Alternative which combines energy efficiency, demand response, distributed generation and changes in energy consumption patterns. BPA had contracted with Energy and Environmental Economics (E3) to conduct the None-Wires feasibility analysis. BPA subsequently dismissed this alternative. We believe that BPA's dismissal of this alternative (SDEIS p. 2-38) was premature and based on dated assumptions that were not applied to other alternatives. E3's analysis (E3 2012) showed that through increasing efficiencies in the existing system and upgrading the existing infrastructure, in could be possible to defer transmission line construction until 2025 or longer. This prudent delay would allow BPA to better respond to issues such as potential listing of Greater Sage-grouse. In additional, this additional time would allow BPA to more thoroughly assess and mitigate environmental impacts of new transmission line on wildlife resources and private property. Furthermore, with improvements regarding energy efficiencies and other non-wire measures, the 2025 timeframe may even be longer. (HSTP214_0030)*

Comment: *All timelines for complex projects such as this tend to become drawn out. Normally, the proponents and permitting agencies adjust all the various timelines accordingly. However, in this case, it appears as though BPA held one alternative to a different – and increasingly impossible – timeline while the timelines for the other, arguably more controversial, disruptive, impactful and harmful alternatives were effortlessly extended. The non-negotiable winter 2013-2014 deadline passed without any of the other alternatives being selected, constructed or brought online. It appears as though that the original deadline was unrealistic or overly ambitious and was not revised as it should have been. (HSTP214 0030)*

Comment: *We appreciate the expanded discussion in the SDEIS regarding the Non-Wires Alternative but find that BPA dismissed this alternative prematurely. Instead of expediting construction of a new transmission line, the Non-Wires Alternative would have combined improvements energy efficiency, demand response, distributed generation, and changes in energy consumption patterns to accomplish the same short-term goals of improved reliability. (HSTP214_0030)*

Response: BPA believes that the EIS adequately explains the reasons why non wires alternatives were considered but eliminated from detailed study, and that the analysis supporting this conclusion is sufficiently valid. As explained in Volume 1, Section 2.5.6, Non-Wires Alternative, potential non-wires alternatives were eliminated from further detailed consideration because they could at most defer, but not eliminate, the need to construct a transmission line. Even if non-wires alternatives were achievable, they would not be a permanent solution to the reliability need of a second source transmission line into the area. In addition, the distributed generation portion of the non-wires alternative was found to be infeasible in part because the local utility has been unwilling to develop the local generation required and has indicated that it would be difficult to ensure that deliveries of LNG would be available during winter peak loads when roads can often be impassable. However, BPA and Lower Valley Energy are continuing with efforts to improve energy efficiency and demand response. These continuing efforts have been included in BPA's yearly load forecast.

Comment: *Throughout this project, private property owners, community members, and wildlife advocates have all questioned the urgency of this project and expressed significant concerns regarding the potential routes. From our review of the SDEIS, there is no clear environmentally preferable alternative except for the Non-Wires Alternative. (HSTP214_0030)*

Response: Comment noted. In accordance with the CEQ NEPA regulations, BPA will identify the environmentally preferred alternative in the Record of Decision (ROD) for the proposed project.

Comment: *As mentioned previously, this prudent delay would allow BPA to better respond to issues such as potential listing of Greater Sage-grouse, to more thoroughly assess environmental impacts of a new transmission line, to develop a mitigation approach for different issues, and to use the estimated mitigation costs as part of the route determination process. All these steps*

would result in a better sited, better planned project with fewer issues. Furthermore, with improvements regarding energy efficiencies and other non-wire measures, the 2025 timeframe may even be longer. (HSTP214_0030)

Response: Comment noted.

Comment: *However, BPA had given E3 a sideboard that the peaking resource component of the Non-Wires Alternative would have to be up and running by the winter of 2013-2014. As such, BPA made the following conclusion in the May 2014 SDEIS (which was released after this deadline had passed):*

> *However, the study ultimately concluded that the non-wires solution was not feasible from a practical perspective because it would not meet the need to reliably serve LVE during peak loads within the timeframe required.*[1]

In essence, BPA prematurely dismissed a completely feasible and potentially more cost-efficient alternative due to a lapsed, no longer relevant deadline. (HSTP214_0030)

Comment: *We point out that the none of the other 9 action alternatives (North Alternative, Long Valley Road Option, North Highland Option, South Alternative, Option 1 (South), Option 2 (South), Option 3 (South), Option 3A (South), Option 4 (South)), had similar timeframes or deadlines imposed. We believe that BPA's dismissal of this alternative (SDEIS p. 2-38) was premature and based on dated assumptions that were not applied to other alternatives. (HSTP214 0030)*

Response: As discussed above, potential non-wires alternatives were eliminated from further detailed consideration because they could at most defer, but not eliminate, the need to construct a transmission line. Even if non-wires alternatives were achievable, they would not be a permanent solution to the reliability need of a second source transmission line into the area.

Comment: *Under the arbitrary deadline imposed by BPA on E3's analysis, in order for the Non-Wires Analysis to be considered, it would have to have been constructed eight months before the comments closed on the SDEIS (August 7, 2014). We point out that, on the current schedule, the earliest possible date for any construction on BLM or Forest Service lands would be 2015, not counting administrative appeals or legal action. Even once a route is selected, BPA would still need to negotiate ROW arrangements with individual private property owners, which would take additional time. We note that the cost estimate has increased from $55 million to $70 million, which should give some pause for thought for the nonwire alternative. (HSTP214_0030)*

Response: Comment noted.

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[1] Hooper Springs SDEIS p 2-39 and 2-40.

3.2.10 Undergrounding

Comment: *As a last resort, I know that power lines can be routed underground and that the cost of doing so for a relatively short distance should not have an unacceptable cost impact as a percentage of total project cost. (HSTP214_0016)*

Response: As described in Volume 1, Section 2.5.7, Undergrounding, burying the transmission line would increase the construction cost of the Project by 10 to 20 times the cost of an overhead line, and would result in much higher maintenance costs.

Comment: *You state (2.5.7) that underground high-voltage transmission cables typically are used only for relatively short distances. A check of the internet reveals greatly expanded use of underground technology in recent and proposed projects by other power companies. Many of the complaints that I hear regarding your proposed project would be greatly reduced or eliminated if you would employ updated methodologies. (HSTP214_0019)*

Response: Comment noted. While it is acknowledged that there are more recent examples if undergrounding, the typical use of undergrounding of high-voltage cables for only relatively short distances remains true today.

Comment: *There is a BPA termed "pinch point" along the Monsanto haul road at the "fish pond" area where it may be necessary to run the power line underground for a very short distance as there is an existing power line already in the area that BPA's line would cross. Monsanto has no further plans to disrupt the soil where the underground line would be. (HSTP214_0022)*

Comment: *Also the east side of the haul road against the mountain is very solid ground with little or no marsh land. Where there may be marsh land, going with an underground wire might need to be considered. (HSTP214_0024)*

Response: As described above and in Volume 1, Section 2.5.7, Undergrounding, because of reliability and environmental concerns, undergrounding the transmission line has been eliminated from further detailed consideration.

3.2.11 Preferred Alternative

Comment: *On the big maps you have back here, the black line is that your preferred route? (HSTP214_0004)*

Comment: *Do you have a preferred route marked? (HSTP214_0004)*

Response: As described at the public meeting, the black line on the project map represents the North Alternative. The preferred alternative, Option 3A, is shown in pink on the project map.

Comment: *My question is what makes that route the preferred route over others? (HSTP214_0004)*

Comment: *The least impact on what? The environment? (HSTP214_0004)*

Comment: *So what you're telling me, then, is, if I'm understanding what you're saying, the environmental impact is more important to you then the impact to the people involved that you are coming through? (HSTP214_0004)*

Comment: *We were greatly surprised to hear Eric announce that the preferred route for the power line would be the one to encumber the China Hat area and our horse barn and the scenic byway. What was even more flabbergasting was to hear him say there was no special reason for this decision that it was just the way it is! (HSTP214_0007)*

Response: Throughout the preparation of the draft and supplemental draft EISs, BPA studied all of the proposed routes by comparing a number of factors, including proximity and potential impacts of each route to residences, various land uses such as agricultural uses, wetlands, migratory bird nesting and other important bird use areas, big game habitat, scenic highways, old growth aspen stands, sage grouse habitat, CERCLA investigation areas, sensitive state or federal lands, and proposed and active mines and mining leases. The acres of state, federal, and private land; the line lengths; number of access road miles; and cost also were compared among the route alternatives. After considering all of the potential impacts from the alternatives and options, BPA identified Option 3A as the preferred alternative. This route would have the fewest impacts to most resources.

With regard to commenter's assertion that BPA's preferred alternative was chosen without extensive thought and deliberation, notes from the May 27, 2014 public meeting show that BPA described why Option 3A was identified as the preferred alternative (see comment HSTP214_0004).

Comment: *As far as the choice on this preferred route where you turned to the east and then parallel the highway, what drives that decision to parallel the highway versus staying away longer and then crossing at just one point? (HSTP214_0004)*

Response: Placement of the transmission line under Option 3A parallel to a portion of Highway 34 would allow good access to the transmission line, especially during line maintenance, from existing county roads and the highway.

Comment: *My brother and I own Lewis Bros., Inc with farm ground located at Henry Idaho. We met with you about a year ago at Henry to discuss the transmission routes you were proposing through our farm ground. We were very much opposed to that route for your transmission lines. The new preferred 3A you are proposing is a better alternative and does not affect the local farmers by putting transmission lines through their farms, including our farm at Henry. We are fully in support of this route. (HSTP214 0003)*

Response: Comment noted.

Comment: *I am in favor of the South Alternative's Option 3A for the following reasons: 1) Option 3A closely follows existing transmission lines. 2) Option 3A follows a path over lands, or near lands, that have been degraded by past mining activity. 3) While Option 3A slightly encroaches into a WMA rejecting this alternative, or all of the Southern Alternatives, would result in the building of 22-23 miles of new transmission lines and creating a new transmission corridor over areas of undeveloped and virgin lands (the Northern Alternatives). (HSTP214_0013)*

Response: Comment noted.

Comment: *Simplot supports BPA's preferred Southern Alternative, Option 3A, and overall favors the southern routes. Simplot encourages BPA to refer to our previous comments (attached) related to the environmental benefits as well as managing the potential risk of contaminants from historical mining operations along any of these southern routes. (HSTP214_0020)*

Response: Comment noted.

Comment: *GYC continues our objection to any alternative that will impact the Blackfoot River WMA. Selection of an alignment, specifically Option 3a, for the Hooper Springs Transmission Project which crosses into the WMA will create a project in which GYC's and its member's interests would be substantially harmed. In this case there are alternatives that will not impact the WMA. (HSTP214_0023)*

Response: Comment noted.

Comment: *Since the additional route option 3A does not introduce new impacts or significantly affect the extent of impacts previously analyzed in the draft EIS, we would support its implementation along with mitigation measures identified in the SDEIS. (HSTP214_0035)*

Response: Comment noted.

3.3 Affected Environment, Environmental Consequences, and Mitigation Measures (Chapter 3)

Comment: *The lands surrounding the other alternatives also exhibit similar traits and all alternatives should be evaluated to incur the least possible impact to the surrounding habitats. (HSTP214_0023)*

Response: Impacts to habitats crossed by the alternatives and their options have been analyzed and are described in Volume 1, Chapter 3, Affected Environmental Consequences, and Mitigation Measures.

Comment: *In addition, the suite of mitigation measures described is best described as remediation actions or best management practices, but do not actually restore, keep whole, or otherwise compensate for the environmental impacts. (HSTP214_0030)*

Response: CEQ defines mitigation as those actions that avoid the impact altogether by not taking a certain action or parts of an action; minimize impacts by limiting the degree or magnitude of the action and its implementation; rectify the impact by repairing, rehabilitating, or restoring the affected environment; reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action; or compensate for the impact by replacing or providing substitute resources or environments.

BPA believes the mitigation measures identified in Volume 1, Chapter 3 sufficiently incorporate all of these concepts of mitigation. In addition, as described in Volume 1, Section 2.1. Transmission Line Siting, BPA seeks to avoid impacts on resources as much as possible. Because BPA's engineers work with BPA's environmental staff in identifying potential environmental and other constraints, the routes that are developed typically provide a good start at avoiding or minimizing effects on sensitive environmental resources in the first place. During construction, implementation of mitigation measures limit impacts on resources. Following construction, areas temporarily disturbed during construction would be restored. In areas where disturbance is permanent such as access roads, mitigation such as seeding with native grasses would be implemented to reduce potential runoff. During transmission line maintenance, the same procedures would be implemented to protect sensitive resources. If compensatory mitigation is warranted (e.g., wetland fill would occur), BPA would develop and implement mitigation in coordination with the regulatory and land management agencies.

3.3.1 Land Use

Comment: *Either the original South Alternative or Option 1 minimizes the distance that the power line impacts agricultural lands and the Scenic Highway 34. Option 3A places many more power poles and high voltage in fields of local farmers. These poles will be a permanent fixture causing inconvenience, risk of collision with farm implements, and an unpleasant distraction to*

local and visiting travelers on Highway 34. We own about one mile of frontage property on Highway 34 that our family plans to farm to many years. My sons and grandsons will operate equipment on that field along with others that we own. Having farmed for over 30 years I know the risks that obstructions in fields can cause, particularly for younger or inexperienced equipment operators. Sometimes there is limited visibility in dusty conditions or when working in the dark. This presents are very real risk of damage to expensive equipment and perhaps physical injury to an operator. I certainly don't want any more power poles than absolutely necessary placed in my fields or those of my neighbors in this county. (HSTP214_0016)

Comment: *Don't take valuable ground away from a Farmer and a Rancher who's livehihood [sic] depends on their ground. Have you ever watched a Farmer or Rancher work on their land. They spend many long hard hours working with high dollar equipment. Their time frame is short and they need to be productive to get their crops planted and harvested in the Spring, Summer and Fall. Farming around power lines isnt [sic] a Soultion [sic], It's an Inconvenience. (HSTP214 0027)*

Comment: *Option #3 does not look like it will even be possible. Have you viewed the comments by the other farmers in the area? Many have stated that they will not allow BPA to run lines through their farmland. In conclusion, it is up to you what choice you will make. (HSTP214_0028)*

Comment: *Anyway, bottom line, it's a huge nuisance for agriculture to deal with. If there is another option that we could take that would avoid those lands, you wouldn't be having a lot of the comments that think you'll have tonight. (HSTP214_0004)*

Response: Comment noted. It is BPA's practice to work with landowners to minimize the impacts from transmission line structures. BPA has attempted to align the proposed transmission lines near property boundaries when crossing private land wherever feasible. Wherever possible, the proposed transmission line would be sited in locations that would result in minimal negative impact on the function and productivity of agricultural lands.

Comment: *In response to Bonneville power Administration's (BPA) current proposed alternative for the Hooper Springs Transmission Project, and pursuant to our face to face meeting with BPA in our offices in Soda Springs on June 23, 2014, Agrium has the following concerns with the preferred alignment (3A) that should be taken into consideration in the EIS:*

- *Issues with regards to the proximity of the proposed transmission line alignments to our leases for future mining projects and real property:*
    - *The proximity of the alignment to our potential "ultimate recovery" pit at our North Dry Ridge (NDR) mine may restrict our capability to recover all ore reserves present, as well as encumber our operational capability for operations such as blasting. Per the face to face meeting held on June 23, 2014, further meetings should be held with the BLM and Agrium in order to ensure that our mineral rights are fully protected with the proposed action.*

- *Future mining at our Wooley Valley and Fox hills leases may potentially be encumbered by the proposed action. If ore reserves are present beyond these leases, the ability for Agrium to recover those reserves could be limited based on the current preferred alignment.*

- *BPA is proposing to use existing access road inside our Dry Valley property. This area is anticipated to be used as a growth media borrow zone. We would like to ensure that our ability to utilize this location as a borrow source for growth media remains unencumbered, which may necessitate BPA re-grading or realigning the access road at various stages over the life of our nearby remediation and mining projects. (HSTP214_0018)*

Response: BPA understands that the proposed transmission line, as a surface use, cannot restrict the full recovery of ore or encumber other mining operations. BPA plans to continue discussions with Agrium regarding the mitigation of impacts from the proposed Option 3A route adjacent to the North Dry Ridge, Wooley Valley, and Fox Hill's mineral leases. BPA would work with Agrium to develop the necessary agreements to relocate BPA's transmission line to assure that future mining operations are free from danger or material interference with its prospecting, mining, or processing operations, should the decision be made by BPA to proceed with construction of Option 3A.

Regarding the borrow area described above, BPA and Agrium would develop an agreement that includes unencumbered access and re-grading or realigning the access road by BPA over the life of Agrium's remediation and mining activities should BPA proceed with construction of the Option 3A.

Comment: *Due to the preferred alignment's proximity to our Wooley Valley Tipple area, we have concerns with regard to our ongoing operations at that site. The proposed alternative crosses our privately owned rail line, which is operated by Union Pacific. Additionally, the line is close to our ore stockpile and tipple facilities. Per our meeting, we would like to have additional meetings and have the line stacked in order to ensure that our ongoing operations are not encumbered. (HSTP214_0018)*

Response: BPA understands the risk of placing a transmission line near and over the top of any rail line. BPA would continue discussions with Agrium to minimize any potential future risk associated with operation of the rail line. As described above, BPA would work with Agrium to ensure that the line does not impact the ability to access the ore stockpile and tipple facilities in the Wooley Valley Tipple area should the decision to build the line be made.

Comment: *The largest remaining concern to Caribou County is the route from Hooper Springs Substation to mile marker 11. The proposal to use "option 3" and go straight north through several miles of prime, productive farmland is unacceptable to Caribou County for the following but not limited to reasons: 1)Disruption, impediment, inconvenience, loss of value, and*

liability issues for the farmers.. 3) Having been tilled, these fields are extremely soft and muddy after rain, particularly in late fall and all spring, making access to the proposed lines nearly impossible with any type of equipment. (HSTP214_0022)

Response: As described above in Easements and Land, it is BPA's practice to work with landowners to minimize the impacts from a transmission line and its structures during construction and maintenance. Mitigation measures would be implemented, including compensating landowners for damage to property or crops, as appropriate; restoring compacted cropland soils as close as possible to pre-construction conditions; and conducting construction activities to minimize temporary disturbance, displacement of crops, and interference with agricultural activities.

3.3.2 Recreation

Comment: *It is our opinion that any construction and permanent infrastructure in the WMA will have profound and negative consequences for habitat and wildlife, which in turn will negatively affect GYC's members and supporters, as well as the larger public who value the WMA for a variety of recreational activities. (HSTP214_0023)*

Comment: *The EIS does not adequately address concerns to the Blackfoot Wildlife Management Area.*

While we understand that Option 3A would be sited away from the Blackfoot River, we are concerned about the effective fragmentation of the WMA and the degradation of recreational experiences there. Our first preference is for the Blackfoot WMA to be avoided entirely. One of the missions of the WMA is to protect and manage wildlife resources as mitigation for habitat losses in other areas. (HSTP214_0030)

Response: As noted above, BPA believes that it has adequately analyzed potential impacts on the Blackfoot River WMA (see Volume 1, Section 3.7, Wildlife).

As described in Volume 2, State Lands, BPA recognizes the Blackfoot River WMA as important public lands managed for recreational activities and as wildlife habitat, and understands the concerns about the proximity of Option 3A to the WMA. Many different routes have been investigated by BPA in an effort to avoid crossing the Blackfoot River WMA while still meeting the project's purposes and need. BPA continues to consult with IDFG and the C-TNF, as well as gather suggestions from interested parties, regarding further ways to avoid and/or minimize impacts on the WMA.

Comment: *The SDEIS states that the transmission line would not have any effect on the eligibility of the Blackfoot River as a Wild or Scenic River. However, Option 3(A) would span the river twice. In addition, the SDEIS provides no analysis of how previous developments of this nature have or have not affected the designation of other rivers or the level of protections. Different designations (Wild, Scenic or Recreational) afford different degrees of protection. We*

believe that the development of the transmission line may downgrade the potential status of some reaches from "Scenic" to "Recreational" or may disqualify them entirely. The analysis needs to fully disclose these impacts and, if relevant, develop design features or alternatives to address them. The SDEIS states that BPA would consult with the National Park Service and C-TNF regarding any potential visual impacts. We believe that the time for such consultations is now, before an alternative is selected. (HSTP214_0030)

Response: The segment of the Blackfoot River from its source to the Blackfoot Reservoir is included on the Nationwide Rivers Inventory (NRI), based on its outstandingly remarkable scenic and fisheries values. As the commenter notes, Option 3A would span the river twice. The first transmission line crossing of the Blackfoot River would be adjacent to a roadway bridge crossing located approximately 0.3 mile east of the intersection of Blackfoot River Road and Highway 34. Other development, including fences, buildings, and other agricultural development, along with mining activity, is also visible in the vicinity of the first crossing.

The second transmission line crossing would be located approximately 9.8 miles east of the first crossing, in the vicinity of the Blackfoot River Narrows. This area is less developed, but an existing road is immediately adjacent to and visible from the river at this point. Along the length of the proposed transmission line route between the two river crossings, roads, a railroad, electrical power distribution lines, agricultural and residential development, and mining activity are all visible.

As noted in Section 3.6, Water Resources, Floodplains, and Wetlands, proposed structures near the NRI-designated segment of the Blackfoot River would be located more than 250 feet from the river bank. No construction-related activities would take place adjacent to the river. Therefore, the transmission line would not alter the free-flowing nature of the Blackfoot River or have any impact on its outstandingly remarkable fisheries values as a result of either of the two proposed river crossings.

As discussed above, a substantial amount of human development is visible along the proposed Option 3A route. As a result, the first transmission line crossing of the Blackfoot River would not be expected to have any appreciable impact on the river's outstandingly remarkable scenic values. The second crossing would be in a less developed area; however, the line would cross perpendicular to the river at this point and quickly move out of sight beyond a ridgeline. Furthermore, the area of the Blackfoot River Narrows is topographically constrained. Thus it is anticipated that no structures would be visible from the river and the transmission line would only be visible in the immediate area of the crossing. As a result, it is unlikely that the transmission line would have any impact on the river's outstandingly remarkable scenic values at the second crossing.

Taking the above into account, BPA anticipates that the construction and operation of the transmission line as described under Option 3A would not foreclose options to classify any portion of the NRI segment as a wild, scenic, or recreation river. BPA is currently consulting with the C-TNF regarding the NRI segment of the Blackfoot River.

3.3.3 Visual Resources

Comment: *I heard there is a possibility of a power line going up out in hyway [sic] 34 and by the old China Hat store. Please don't allow this. It's so beautiful out there. We want to continue to enjoy the scenery - not the power lines. (HSTP214_0005)*

Comment: *As a concerned rancher it is coming to my attention about the desire to run a power line down through the China Hat area. As a rancher in the area I don't feel that would be very beneficial to us there where we are not even benefiting from the power line. I feel it will cause problems in farmers' fields which we all work very hard to maintain and keep in the up most shape. We that maintain the ground there in the China Hat area want it kept very clean and pretty and a new big power line will not benefit the looks of the area. (HSTP214 0008)*

Comment: *We like the look of our little area and we want it to stay that way so please listen to the concerned farmers and ranchers in the area, don't just brush our comments aside please listen. (HSTP214 0008)*

Comment: *Please do not ruin this beautiful little area with an ugly big power line. (HSTP214_0009)*

Comment: *I have family and friends who own land along Highway 34 & have spent much of my childhood in that particular area. My family and I continue to spend a lot of time near the Chine Hat and often take Sunday drives along Highway 34 simply because we love scenery and the drive. We do not want to clutter up Highway 34's beauty with the "industrial look," which is what your power line project would do. (HSTP214_0011)*

Comment: *As I study the alternatives that you have identified for the Hooper Springs Transmission Project, I believe that Option 3A is not the optimal choice. In my opinion, the original South Alternative or Option 1 would be a much better choice in minimizing negative impacts upon area residents, area farmers, people visiting the area, and the natural beauty of the area. (HSTP214_0016)*

Comment: *In addition, Option #3 goes along a major highway! The major highway used by tourists in and out of Soda Springs to go to Jackson Hole etc. It would significantly decrease the beauty of the drive for tourists traveling through Soda Springs, which may impact the route used by tourists to get to their location of choice, and I can tell you from the conversations I have had with local store owners that a decrease in tourists through the area would greatly impact their sales (and the businesses in Soda Springs are already struggling enough). (HSTP214_0028)*

Comment: *Please have your studies look at putting the line on Haul road. It would not be so damaging to the aesthetics of the area. (HSTP214_0038)*

Response: Comments noted. As described above in the response to comments concerning the preferred alternative, BPA studied a number of factors before identifying Option 3A as the preferred alternative. As discussed in Volume 1, Section 3.3, Visual Resources, Option 3A would be visible to travelers and residents traveling along Highway 34 through private land.

Comment: *Construction of the proposed transmission line project and any of the alternatives will have a profound negative long-term visual effect on portions of the project that will be visible to the public because it "would create an obvious human-made or industrial element to the landscape" which will forever alter the integrity of the natural setting of the land."The presence of a new transmission line would initially be a visual obtrusion on the landscape, although over time motorists and residents would become familiar with the transmission line and associate it with the existing landscape." The Tribes HeTO does not agree that one will ever become familiar with the line and associate it with the landscape. The construction of the proposed project will also have an unnatural effect on the view of the sunset or sunrise "where the structures cross the skyline or are in the viewers', foregrounds" regardless of the effect rating illustrated in the Supplemental Draft EIS. (HSTP214_0039)*

Response: BPA recognizes that placement of a transmission line would have impacts on the visual quality within portions of the project area. However, the presence of phosphate mining and other industrial activities have compromised the visual integrity of the project area. Some impact ratings have been corrected in Volume 1, Section 3.3, Visual Resources, in acknowledgement of this comment and BPA's response.

3.3.4 Water Resources, Floodplains, and Wetlands

Comment: *We encourage you to engage in discussions with DEQ in the early stages of this project so that potential impacts to water quality/aquatic resources can be taken into account and avoided if possible. Our main concerns are focused on temporary and permanent water quality impacts resulting from roads, staging areas, crossings and vegetation maintenance associated with the project. (HSTP214_0021)*

Response: As described above under Maintenance, BPA would continue to coordinate with IDEQ as applicable to address any concerns about water quality standards throughout the life of the proposed transmission line.

3.3.5 Wildlife

Comment: *The largest remaining concern to Caribou County is the route from Hooper Springs Substation to mile marker 11. The proposal to use "option 3" and go straight north through several miles of prime, productive farmland is unacceptable to Caribou County for the following but not limited to reasons: ...2) tens of thousands of migratory waterfowl use this area intensively for late summer/fall and spring feeding and would be at risk of striking power line... (HSTP214_0022)*

Response: BPA developed an avian collision risk model based on landscape features, habitat, and documented bird use areas. In addition, the agency has consulted with IDFG concerning localized areas that pose greater risks to avian collisions than others along the proposed route. Using both sources of information, BPA has proposed marking the transmission line along specific spans in the first 11 miles of the line (see Chapter 2, Appendix H Wildlife, for the

updated avian collision risk model and updated marker plan for Option 3A). BPA believes that this targeted marking plan would substantially reduce risks of avian collisions in this area.

Comment: *We believe that before a route is selected; the analysis needs to provide additional details on specific impacts to waterfowl, wildlife, the Blackfoot Wildlife Management Area, Greater Sage-grouse, trumpeter swans, sand hill cranes and other wildlife. (HSTP214_0030)*

Response: BPA believes that it has adequately analyzed impacts to the above mentioned resources including the Blackfoot River WMA (see Volume 1, Section 3.7, Wildlife).

Comment: *The SDEIS has a map showing the Preliminary General Habitat (PGH) and Preliminary Priority Habitat (PPH) but does not provide maps showing the specific locations of historic or current leks or locations where verified sage-grouse sitings have been recorded. (HSTP214_0030)*

Response: As part of BPA's data sharing agreement with agencies that manage wildlife (in this case IDFG), BPA does not publish locations of sage grouse leks or any other ESA listed or sensitive species' nesting or breeding areas. Additionally, publishing the location of these types of sensitive areas increases the risk of harm or disturbance from human activities.

Comment: *We also note that these PGH and PPH designations are preliminary by nature and may be adjusted in the next year. The analysis of impacts to sage-grouse, sharp-tailed grouse, nesting birds, and other wildlife species should not [sic] deferred to future surveys to conducted after a Record of Decision is signed and prior to construction:*

> *Conduct pre-construction surveys for sage-grouse and Columbia sharp-tailed grouse leks in sagebrush habitats.*[2]
>
> *Pre-construction surveys would be conducted for nesting bird species in furtherance of the Migratory Bird Treaty Act and Forest Goals.*[3]
>
> *Additional raptor surveys would be conducted for the Option 3A corridor prior to tree removal.*[4]

The analysis of the potential impacts to wildlife is a key issue that should help determine which route is ultimately selected. (HSTP214_0030)

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[2] Hooper Springs SDEIS, p. 2-59.
[3] IBID, p. A-22.
[4] IBID, p. A-25.

Response: The analyses of impacts on the wildlife species mentioned are presented in Volume 1, Section 3.7, Wildlife. The items listed above are proposed mitigation measures to further reduce potential impacts, specifically associated with construction timing and disturbance during avian mating and nesting period. If species are present in the construction areas, BPA would work with the federal and state wildlife agencies to avoid impacts to the extent practicable.

Comment: *BPA seems to be underestimating the importance of doing thorough sage-grouse surveys in advance of route selection:*

> *If active leks are identified prior to ROW clearing activities, BPA would consult with USFWS personnel on mitigation or avoidance protocols.*[5]

If active leks are identified prior to ROW clearing activities, it is far too late to discuss avoidance protocols. The time to identify and avoid leks is now, by selecting an alternative so the line avoids leks by several miles if at all possible. (HSTP214_0030)

Response: As part of the NEPA process, BPA has conducted both aerial and ground surveys for the presence of sage-grouse and other species. BPA has conducted annual sage-grouse surveys for the last two years for Option 3A, coordinating with BLM, IDFG, and the C-TNF. The surveys have been done per the protocols established by BLM and IDFG. BPA has surveyed active and inactive leks in and around the proposed alignment noting that the closest active lek is more than 2 miles away and separated by roads and other agricultural-based development. Many of the historic leks in the area are no longer active and have not been active for a number of years. However, BPA realizes that birds move to new areas and has proposed to conduct pre-construction surveys to avoid impacts to lekking or nesting sage-grouse and other avian species.

Comment: *In addition to mapping actual sage-grouse locations, the analysis should examine and disclose the quality of sagebrush habitat along each route. The categories used (such as sagebrush-dominated) are not sufficiently detailed to provide meaningful information relative to potential impacts to sage-grouse and other wildlife. Different species of sagebrush are more significant to sage-grouse than others and the presence of native forbs and perennial grasses is a key component in assessing the quality of sagegrouse habitat. The analysis needs to provide additional information of the quality of the vegetation along each route. (HSTP214_0030)*

Response: As noted above, as part of BPA's data sharing agreement with agencies that manage wildlife (in this case IDFG), BPA does not publish locations of sage grouse leks or any other ESA listed or sensitive species' nesting or breeding areas. Additionally, publishing the location of these types of sensitive areas increases the risk of harm or disturbance from human activities. BPA has conducted general sage-grouse habitat surveys of the proposed transmission line and considered this information in its analysis. These surveys were conducted using protocols developed in concert with BLM and IDFG. It should be noted that the transmission line

[5] Hooper Springs SDEIS, p. A-29.

is outside of the Preliminary General Habitat (PGH) and Preliminary Priority Habitat (PPH) for sage-grouse being developed by BLM.

Comment: *In terms of presenting information, the metrics used on p. 3-194 and 3-195 are inconsistent and make it harder to compare the impacts of different alternatives. The total area cleared is presented as an acreage amount in some alternatives while others are presented as "fewer acres", relative to the first description, instead of the actual amount (see description of Option 3A). (HSTP214_0030)*

Response: It was BPA's intent to provide a comparison of the impacts from the route options to the alternatives (e.g., compare options 1 through 4 to the South Alternative).

Comment: *The SDEIS states that the potential for occurrence in both the North and South Alternatives is high. Numerous studies have highlighted the negative effects of linear infrastructure on sage-grouse persistence. As mentioned in our previous comments, allowing development of a transmission line through this landscape could result in harmful, and potentially irreversible impacts to greater sagegrouse habitat, both by damaging sage-grouse habitat through the construction and maintenance of power lines and by providing perches for raptors and other birds of prey to more easily prey on sagegrouse. The U.S. Fish and Wildlife Service has found that transmission lines have a range of adverse impacts on sage grouse and their habitats. 75 Fed. Reg. 13909, 13928-29 (March 23, 2010). The Service's 12-month finding on sage grouse noted the many transmission line proposals pending in the western states and explained "If these lines cross sage grouse habitats, sage grouse will likely be negatively affected." Id at 13929. More recently, the BLM's Sage-grouse National Technical Team reached the same conclusion and recommended that the BLM "[m]ake priority 4 sage-grouse habitat areas exclusion areas for new [right-of-way] permits" with narrow exceptions. Id.*

In addition, IM 2012-043 requires additional procedures for pending right-of-way applications that would affect more than one linear mile of sage grouse habitat. These procedures include a high-level interagency review process for any right-of-way project that would fail to "cumulatively maintain or enhance sage-grouse habitat." The sage-grouse habitat that will be affected by proposed project routes has been acknowledged by the BLM as potentially important for protection. (HSTP214_0030)

Response: BPA agrees that development, including the referenced powerlines, has had negative effects on greater sage grouse as it removes sagebrush habitat in the short term. However, the USFWS' discussion in their 12-month finding on sage grouse, group all powerlines together regardless of size or structure. For example, the findings do not differentiate between transmission and distribution lines other than suggesting that there is no estimate for the total number of distribution line mileage. This distinction is important as there are more miles of distribution lines, they are lower in height, provide perches and nesting opportunities, and can cause injury and death from collision and/or electrocution. The USFWS findings also mention that powerlines collectively cause collisions based on only three publications and a personal

communication providing support. Regardless of the lack of documented evidence, it is well established that transmission lines can result in avian collisions if not designed well, sited appropriately, or marked in high bird use areas (APLIC 2012). Transmission lines and towers are designed differently depending on variety of factors. Transmission lines such as BPA's are designed to APLIC standards which eliminates the potential for electrocution based on the spacing of conductors. Structure design is also important, especially as it relates to the raptor and corvid perching and predation. Structure design can include steel lattice, H-frame wood poles, and tubular monopoles, among others. The former two designs unintentionally provide areas for nesting and perching. The latter design—tubular monopoles—does not allow for the same perching and nesting opportunities and therefore mitigates potential indirect effects to sage grouse from raptor and corvid predation. The USFWS finding also discusses habitat fragmentation and the potential spread of invasive species, which can reduce overall habitat suitability and result in sage grouse avoidance. BPA would conduct pre- and post-construction surveys for non-native plants and take action to eliminate them in the proposed ROW.

BPA recognizes the importance of high quality habitat and has sited the transmission line to avoid active lek sites, and both BLM-defined preliminary priority habitat and preliminary general habitat. The preferred alternative primarily crosses agricultural lands or follows Blackfoot River Road in already disturbed/developed areas. In addition, the preferred alternative crosses approximately 0.5 miles of BLM lands. BPA would work with BLM to receive an authorization for the crossing and discuss appropriate mitigation measures per their Greater Sage-Grouse Interim Management Policies and Procedures.

Comment: *The SDEIS states that sage-grouse may be temporarily displaced from areas where the transmission line is being constructed, however, recent studies strongly suggest that, while individual sage-grouse may return for a short period of time, sage-grouse populations will not persist in these areas. The analysis needs to correct this and describe this displacement as a permanent and irretrievable effect. In addition, BPA needs to examine how to best mitigate for this loss of viable sage-grouse habitat (see section below). (HSTP214_0030)*

Response: The commenter suggests that the proposed transmission line would result in the loss of viable sage-grouse habitat; however, based on the sage-grouse trends in the area, in terms of the decreased number of active leks over the last few years, it is unclear that the habitat is viable. It could be suggested that the area traversed by the transmission line is marginal habitat. As stated in the Volume 1, Section 3.7, Wildlife, the preferred alternative would permanently impact approximately 28 acres of sage brush habitat—five fewer than the South Alternative. Sage-grouse identified in or near the proposed transmission line corridor during aerial surveys were not present during ground surveys. Given the lack of active sage-grouse activity in the area and being outside both PGH and PPH, it is unlikely that the construction and operation of the transmission line would result in population-level effects of sage-grouse in southeastern Idaho.

Comment: *We are also concerned about impacts to other species of wildlife, particularly sand hill cranes, trumpeter swans and mule deer. We believe that additional analysis is needed on potential impacts and how to best avoid, minimize and mitigate them. We recommend that*

BPA use a Habitat Equivalency Analysis model to further quantify high quality habitats. (HSTP214_0030)

Response: Comment noted. A habitat equivalency analysis (HEA) is typically used to determine compensatory mitigation needs, often applied to natural resource damage assessments related to hazardous releases or contamination. This approach was used by BLM, USFWS, IDFG, and Wyoming Fish and Game in the Gateway West Transmission Project to allow for the calculation of sage-grouse habitat mitigation. The Gateway West Project traverses 1,000 miles compared to the proposed 24-mile-long Hooper Springs transmission line (only approximately 5.4 miles across public lands). During consultations with BLM, USFS, USFWS, and IDFG, the need for an HEA was not suggested. As described above, BPA believes that it has adequately analyzed impacts on wildlife species (see Volume 1, Section 3.7, Wildlife). With respect to sand hill cranes and trumpeter swans, BPA proposes to install visibility enhancement devices, in compliance with the most recent APLIC and APP guidance, on the overhead ground wires to reduce the risk of collision. To avoid impacts on mule deer, construction between Dry Ridge and Upper Valley within the Blackfoot River WMA would be avoided during the elk and mule deer calving and fawning period (April 15 to July 1).

Comment: *We are also concerned about impacts to bird species that utilize the Gray's Lake National Wildlife Refuge, Blackfoot Reservoir and Blackfoot River Corridor. We recommend additional analysis for how to locate, mark and orient transmission lines to minimize any collisions.*

We appreciate the consideration of design features to minimize perching and nesting by raptors, but note that the single-pole construction is not used consistently. The analysis needs to provide further rational for why less-protective measures may be used in certain places. (HSTP214_0030)

Response: As described above and in Volume 1, Section 3.7.4, Mitigation, visibility enhancement devices would be installed on the overhead ground wires to reduce the risk of collision. Volume 3, Appendix H, Avian Collision Risk Assessment and Marking Plan, describes how the model was developed to identify high-risk areas along all of the alternatives and options.

The preferred alternative, Option 3A, would consist entirely of 115-kV double-circuit steel monopole structures.

Comment: *We note that the way the sage-grouse analysis is being conducted appears to be inconsistent with BLM Internal Memoranda for sage-grouse. (HSTP214_0030)*

Response: BPA coordinated with BLM and IDFG on survey design and protocol for conducting sage-grouse habitat and lek surveys.

Comment: *In addition, the final EIS should include outcomes of planned consultations with the US Fish and Wildlife Service on potential migratory birds' impacts and recommended measures to reduce risks and protect biota and habitat. (HSTP214_0035)*

Response: Unlike the Endangered Species Act, the Migratory Bird Treaty Act does not require formal or informal agency consultation. However in furtherance of the Migratory Bird Treaty Act, the executive order on migratory bird conservation, and the Department of Energy's Memorandum of Understanding with USFWS, BPA has been coordinating with USFWS on the development and use of an avian collision risk model and the development of a marking plan to reduce the potential risks of avian collisions. Volume 1, Chapter 4 provides a discussion concerning these efforts.

Comment: *Also, Option #3 would impact the bird population because it is on a bird migration route. I learned in school that Grays Lake is an important nesting grounds for sandhill cranes and a good possible location for a nesting grounds for whooping cranes as well. Whooping crane populations are low and it would be good to keep any obstructions to this population as far out of their way as possible. (HSTP214_0028)*

Response: BPA agrees that there could be effects to migratory birds from the siting of the proposed transmission line, as discussion in Section 3.7.3, page 3-191. However, BPA would commit to marking the transmission line conductors in areas that pose high potential avian collision risk to reduce the potential for bird injuries to mortalities.

Comment: *For example, the US Fish and Wildlife Service, Office of Migratory Bird Management, Denver, flies these areas annually in September to survey cranes, and pinpoints crane locations by GPS. How could you possibly completely ignore these key data in your voluminous analysis? In addition to completely ignoring the large volume of crane data that the US Government has collected at considerable expense… your project relies on 20th century technology while attempting to meet 21st century needs. (HSTP214_0019)*

Response: BPA is not aware of those data nor has USFWS, during consultation with BPA, provided those data. Other data related to Grays Lake National Wildlife Refuge provided by USFWS was incorporated in the analysis.

Comment: *While the OSC agrees that wolverines may exist within Caribou County, there is an extremely low potential that they would be adversely affected by this project. The OSC recommends that BPA use best management practices and seasonal restrictions when building the southern alternative in order to minimize impacts on this species. (HSTP214_0037)*

Response: Comment noted. If the decision is made to build the transmission line, BPA would consult with the C-TNF regarding implementation of best management practices such as timing restrictions. The proposed project would occur at a maximum elevation of 6,450 feet,

which is well below the 8,200 foot elevation considered the minimum elevation for wolverine denning in Idaho. Additionally, there are no known or expected den locations in the project area.

Comment: *OSC agrees with Table 3-21 that this species will not be affected by the proposed project. There are no documented occurrences of the yellow-billed cuckoo near the proposed project area, nor any records of it occurring in Caribou County. (HSTP214_0037)*

Response: Comment noted.

Comment: *We point out that the State of Idaho is in the process of developing a Mitigation Framework for Sage-grouse which is directly relevant to this situation and could be potentially helpful in offsetting impacts. Regarding impacts to the integrity of Blackfoot Wildlife Management Area, we recommend working with the State of Idaho and the Idaho Department of Fish and Game on a comprehensive mitigation strategy should Option 3A be ultimately selected.—Before a route is selected, there are several examples of conservation and restoration work in the area that BPA may be interested in reviewing in order to develop a mitigation program for the project. These examples include the work of the Sagebrush Steppe Regional Land Trust, local conservation organizations, and the Upper Blackfoot Confluence. The Upper Blackfoot Confluence is a partnership of conservation groups and private companies dedicated to restoration activities in the Blackfoot River watershed. We recommend that any mitigation strategy be integrated on a watershed scale so that benefits of any individual projects are coordinated with other restoration activities for maximum benefit. (HSTP214_0030)*

Comment: *Before any route is selected, we recommend that BPA discuss mitigation options for each alternative with the State of Idaho and the Idaho Department of Fish and Game. Wildlife resources affected by the project (both inside and outside the WMA) need to be fully mitigated. Potential avenues to discuss with IDFG include long-term habitat improvements for focal species (Yellowstone cutthroat trout, elk, mule deer, Brewer's sparrows, and Northern Leopard frog), addressing improved monitoring, noxious weed treatments, improved outreach, education and enforcement efforts, and pertain to the most recent WMA objectives. (HSTP214_0030)*

Response: BPA has been working closely with the State of Idaho, which is a cooperating agency for the EIS. As part of this consultation with the Idaho Governor's Office of Energy Resources and the Idaho Department of Fish and Game, BPA has worked to identify areas of potential concern and develop mitigation measures, such as bird markers on the proposed transmission line.

Comment: *Resources in need of mitigation may include aspen, snags, bald eagle nesting platforms, enforcement of road closures, and increased monitoring. We note that the duration of the mitigation provided should last as long as the impacts persist. (HSTP214_0030)*

Response: BPA has rerouted portions of Option 3A to avoid aspen stands located on the Blackfoot River WMA at the east side of the Project. Creation of snags has not been proposed; however, BPA proposes to clear a 250-foot-wide area per a request by the C-TNF on their lands only (see Volume 1, Section 2.2.5, Vegetation Clearing) and has proposed to avoid snag and large tree removal to the extent possible. The 250 foot cleared area would be centered on the 100 foot transmission line ROW and initially be cleared of all tall growing vegetation. During operation of the transmission line, only vegetation within the 100 foot transmission line ROW would be managed as low growing. This would reduce long-term disturbance to wildlife and vegetation within the forested areas. BPA would reseed disturbed areas and monitor to ensure reseeding efforts are successful. Monitoring would occur to ensure mitigation actions are successful. BPA would take the necessary stapes to restrict access to publically closed roads, using gates or other impediments. It would rely on the C-TNF and other land managers to enforce prohibited uses on their lands such as public use of closed roads.

Regarding eagle nesting platforms, eagle surveys did not document nests within or adjacent to the ROW. As eagles do utilize the general area, BPA intends to mark the conductor in high risk areas.

Comment: *Decommissioning unauthorized or redundant roads in the broader area could help on a number of fronts. Reduced road densities can reduce the pressure that firewood cutters place on snags that are important for wildlife. Road can also be decommissioned and be ripped to stimulate aspen growth. The C-TNF has an extensive aspen restoration program which could provide mitigation opportunities. (HSTP214_0030)*

Response: BPA recognizes that decommissioning roads can reduce sediment related impacts to streams from vegetation removal and has worked on other projects with land management agencies to do so. However, few roads that could be decommissioned as compensation for the proposed project's road building are present on C-TNF lands crossed by the Project. Additionally, because the C-TNF has not requested BPA incorporate this activity into the Project, road decommissioning has not been included.

3.3.6 Fish

Comment: *Additional information is needed on how herbicide spraying along the ROW may affect water quality and aquatic life, particularly when the ROW may cross the Blackfoot River and numerous intermittent streams. (HSTP214_0030)*

Response: As described in Volume 1, Section 2.2.8, Maintenance, and Volume 2, Vegetation Clearing, BPA's ROW vegetation management is guided by its Transmission System Vegetation Management Program EIS. BPA adopted an integrated vegetation management strategy for controlling vegetation along its transmission line ROWs in 2000. This strategy involves choosing the appropriate method for controlling the vegetation based on the type of vegetation and its density, the natural resources present at a particular site, landowner requests, regulations, and

costs. BPA may use a number of different methods, including manual (hand-pulling, clippers, chainsaws), mechanical (roller-choppers, brush-hogs), biological (insects or fungus for attacking noxious weeds), and herbicides. Specific information on the types of herbicides used and measures implemented to avoid impacts to water quality can be found at http://efw.bpa.gov/environmental_services/Document_Library/Vegetation_Management/.

3.3.7 Cultural Resources

Comment: *We are concerned about impacts to the Pioneer Historic Byway Corridor and the Landon Trail and ask BPA to conduct additional analysis of impacts and ways to further reduce them. (HSTP214_0030)*

Response: As described in Volume 2, Cultural Resources, BPA has made every effort to gain access to lands where the Lander Trail may be located but has not been provided access. Section 3.9, Cultural Resources, describes where the North Alternative would cross the mapped Lander Trail, but BPA has not been allowed to survey for visible tracks. Because of this lack of access, BPA has not been able to evaluate this portion of the road for inclusion in the National Register of Historic Places and has not been able to conduct a viewshed study of the road area.

Also discussed in Volume 2, Land Use, State Lands, the Corridor Management Plan for the Pioneer Historic Byway provides management prescriptions for preserving the visual and scenic qualities of the highway corridor. The Corridor Management Plan does not prohibit the construction of transmission lines, but rather recommends that road building and infrastructure development within the byway corridor should minimize visual impacts, and that future installation of overhead power lines along the byway corridor should be minimized. In an effort to reduce visual impacts, the transmission line would be sited to blend in with the background to the extent possible. Where the transmission line would parallel or cross Highway 34, the transmission line would be in the foreground and obvious to motorists; however, for large portions of the North Alternative corridor, the transmission line would be partially or completely obscured by topography. This would especially be true for the portion of ROW crossing state lands east of Highway 34, and the portion crossing BLM and C-TNF lands in the northeastern part of the North Alternative corridor. In this northeastern portion of the North Alternative, the use of wood pole structures from line miles 11 to 22 would further allow the line to blend in with the background.

Comment: *The Shoshone-Bannock Tribes (Tribes) Heritage Tribal Office (HeTO) appreciates the opportunity to comment on the SDEIS for the proposed Hooper Springs Transmission Project. The proposed project located near Soda Springs, Caribou County, Idaho is within inherent ancestral lands of the Shoshone and Bannock people, and continues to hold important cultural properties, traditional hunting, fishing and gathering activities still practiced today by member of the Shoshone-Bannock Tribes. (HSTP214_0039)*

Response: Comments noted.

Comment: *The Tribes HeTO would like a map illustrating the locations of each of the eight prehistoric sites, located near the Blackfoot River and associated tributaries (and their survey reports), relative to the project area. (HSTP214_0039)*

Response: Comment noted. The requested maps showing the site locations were included in a report provided to Mrs. Carolyn Boyer Smith of the Shoshone-Bannock Tribes of the Fort Hall Reservation in February 2014. The survey report, dated January 2104, is titled: Addendum #1: Archaeological Survey and Literature Review for the Proposed BPA Hooper Springs Transmission Project, Geotechnical Boring Locations for the South Alternative's Option 3A, Caribou County, Idaho. The references sites are shown in Appendix A. Aerial Maps Showing Geotechnical Boring Locations and Survey Coverage on Option 3A.

Comment: *The Tribes agrees with having cultural resource monitors present during the ground disturbing activities since the proposed project may perhaps disturb unknown cultural sites. The Tribes HeTO requests the presence of cultural resource monitors throughout the entire process during the ground disturbing activities of the proposed project and any other areas which will be impacted and not only where known cultural resources have been identified. The Tribes HeTO realizes that surveys for a major portion of the proposed project areas may have been conducted; however, this does not rule out the existence of subsurface materials; therefore, a cultural resource monitors presence will reduce the chances of disturbing unknown cultural resources. (HSTP214_0039)*

Response: Comment noted. BPA is open to discussions with the Shoshone-Bannock Tribes regarding the presence of cultural resource monitors during construction of the transmission line should the decision be made by BPA to construct the line.

Comment: *The proposed project will involve ground disturbance; therefore, the Tribes HeTO requests the following inadvertent discovery clause incorporated into the Stop Work Order Plan.*

> *In the event of an inadvertent discovery (cultural resources and/or human remains) the Tribes HeTO requests a Stop Work Order of construction activities and immediate notification to the Tribes HeTO. Construction shall cease until proper treatment of cultural resources and/or human remains is achieved. (HSTP214_0039)*

Response: Comment noted. Should BPA make the decision to proceed with construction of the transmission line, inclusion of the above stipulation in the inadvertent discovery clause would be possible.

3.3.8 Socioeconomics

Comment: *We purchased our property not too many years ago. The realtor said one of the greatest values of our property and for which we paid more was for development. We have a mile of frontage on the highway, some very nice farm ground and a mile and a half of the Blackfoot River that runs through our property. It is close to the Blackfoot Reservoir and China Hat and China Cap. It is a very nice property in a beautiful area. A big high tension line down that highway would ruin our property for development. (HSTP214_0009)*

Comment: *I need more information about property devaluation from a transmission line, decrease in property taxes and loss of taxes to the county. (HSTP214_0038)*

Response: A discussion of property value and taxes is included in Volume 1, Section 3.10, Socioeconomics.

Comment: *In response to Bonneville power Administration's (BPA) current proposed alternative for the Hooper Springs Transmission Project, and pursuant to our face to face meeting with BPA in our offices in Soda Springs on June 23, 2014, Agrium has the following concerns with the preferred alignment (3A) that should be taken into consideration in the EIS:*

- *Issues with regards to the proximity of the proposed transmission line alignments to our leases for future mining projects and real property:*
- *The value of any potential mitigation projects on the Dry Valley property could be diminished with the current alignment. Further, we have concerns that the value of our "Access Yes" initiative on the property under that initiative. (HSTP214_0018)*

Response: As described above, BPA would work with Agrium regarding mitigation of impacts of the preferred alternative because of the close proximity to their future mining activities. BPA recognizes the additional value in some of the property owned by Agrium because of the "Access Yes" initiative.

3.3.9 Public Health and Safety

Comment: *The deal for safety is a huge issue, I understand, and having to deal with hot wires. I still would like to have it looked at anyway. (HSTP214_0004)*

Comment: *We also worry about the health hazards of big power lines. It would destroy our investment. (HSTP214_0009)*

Comment: *I need more information about health hazards of a transmission line. (HSTP214_0038)*

Response: Comments noted. Included in Volume 1, Section 3.13, Public Health and Safety, is a discussion of public health and safety concerns, such as shocks, fires, and EMF related to transmission facilities or construction activities.

Comment: *So there would be no danger or risk of coming in contact with the wires? (HSTP214_0004)*

Response: As described in Volume 1, Section 3.13, Public Health and Safety, and Volume 3, Appendix L, there are risks associated with working near high-voltage lines. Volume 3, Appendix L, Living and Working Safely around High-voltage Power Lines, describes safe use of the ROW and general safe practices when operating equipment within transmission line ROWs.

Comment: *This is a small family farm operated by my husband, sons and myself. Sometime ago, my husband and I met with Mike Richardson to express our dismay at a possible power line through our barley acreage. The poles are an extreme danger to our family as many of them are novice equipment operators. (HSTP214_0010)*

Comment: *Operating equipment is already tough enough with obstructions in the way, and every obstruction in the field causes a good amount of farmland around it to remain unused, because too tight of a turn could cause a collision. Being an operator of equipment myself, I would greatly appreciate it if the obstructions could be placed somewhere outside of the fields I will be working in. (HSTP214_0028)*

Response: Comments noted. As noted above, Volume 3, Appendix L, Living and Working Safely around High-voltage Power Lines, describes safe use of the ROW and general safe practices when operating equipment within transmission line ROWs.

3.3.10 Cumulative Impacts

Comment: *As mentioned previously, there are a number of other developments in this area, including exploration and expansion of phosphate mines, that may have cumulative environmental effects. We are particularly concerned about water quality, habitat fragmentation, noxious weed expansion, and loss of secure habitat by wildlife. The analysis should take a more thorough look at the cumulative effects more thoroughly and develop alternatives that avoid, minimize and mitigate these impacts. (HSTP214_0030)*

Response: Comment noted. BPA believes that Volume 1, Section 3.16, Cumulative Impacts, provides a reasonably thorough analysis of potential cumulative effects, including those referenced by the commenter. In addition, the numerous alternatives included in the EIS provide options for avoiding and minimizing potential impacts, and mitigation measures are also identified in Volume 1, Chapter 3.

Comment: *The Shoshone and Bannock Tribes HeTO value their cultural resources and rich history of this land which has been and currently still is being subjected to intrusive destruction. "Cultural resources in Caribou County have been and are being cumulatively affected because of past and present development activities... Cumulative impacts associated with these activities include disturbance of cultural sites, reduction of the cultural integrity of certain sites, and removal of cultural artifacts. Construction of the North Alternative or South Alternative and all route options could contribute incrementally, albeit in a very minor way, to these cumulative impacts." Most of the cumulative effects that occurred during past times were not applicable to present laws enacted exclusively for the protection of cultural resources. The Tribes HeTO hopes you will take this into consideration because the proposed project is contributing to which you describe as "Construction of the North Alternative or South Alternative and all route options could contribute incrementally, albeit in a very* ***minor*** *way, to these cumulative impacts.", is really* ***major*** *when all (past and present) effects are combined.* (*HSTP214_0039*)

Response: Comment noted. Text has been corrected in Chapter 2, Section 2.2.2, Cumulative Impacts Analysis, to address this comment.

3.4 Consultation, Review, and Permit Requirements (Chapter 4)

Comment: *The USFWS is expected to make a determination on whether to list sage-grouse under the ESA in 2015. If sage-grouse are listed, substantial restrictions on infrastructure developments in sage-grouse habitat may be enacted. If sage-grouse are not listed, it will be because of the creation and implementation of a comprehensive state plan to recover the species. This state plan will likely include some restrictions on infrastructure development in sage-grouse habitat, particularly in areas identified as Core or Important. Because of previous habitat disturbance in this area, these plans may treat this area as General Habitat which is less restrictive and which may allow infrastructure of this nature in this location.*

A component of Idaho's Sage-Grouse Conservation Plan is a Sage-grouse Mitigation Framework for projects that impact sage-grouse habitat, including those in General Habitat. This Mitigation Framework is still in development but has been submitted to the BLM and USFWS as part of Idaho's Sage-grouse Alternative currently under review. This is a voluntary program but may have benefits over other mitigation programs. The concept is that developers could use this framework to offset impacts to sage-grouse habitat. Depending on the quality of the habitat and the nature of disturbance, mitigation funds could be assessed and directed to sage-grouse habitat improvement projects in Core and Important Areas. We are including a copy of the Mitigation Framework as a separate attachment. We would be happy to discuss this program with BPA for both this project and other BPA projects that may impact sage-grouse habitat. (HSTP214_0030)

Response: As noted above, BPA recognizes the importance of high quality habitat and has sited the transmission line to avoid active lek sites, and both BLM-defined preliminary priority habitat and preliminary general habitat. These are the same habitat areas being considered by the

state of Idaho. If sage-grouse are listed prior to construction the proposed transmission line, BPA would fulfill its Section 7 Endangered Species Act responsibility and consult with the USFWS on the potential effects to sage-grouse. That process would identify the appropriate conservation measures that would need to be implemented. BPA would continue to work with its cooperators on the project to minimize impacts to sage-grouse.

Comment: *Because the project will require a number of permits, including Clean Water Act Section 401, 402 and 404 (p. 4-6), the final EIS should include information on the status of those permit applications and measures to protect water quality. (HSTP214_0035)*

Response: Volume 1, Section 4.9, Clean Water Act, describes BPA's intent to comply with all sections of the Clean Water Act. If a decision is made to construct the transmission line, BPA would apply for and obtain all necessary permits.

3.5 Other Comments and Responses

Comment: *Furthermore, I think it would be beneficial to Bonneville Power and yourself to have a good working relationship with the community, land owners, and Monsanto. (HSTP214 0011)*

Response: Comment noted.

Comment: *I appreciate Joe, Mike, Eric, Luke, Shannon and 2 others coming to visit with us at the horse barn at China Hat on April 30, 2014 to discuss the issue of pole placement. Thank you to all of them for making the effort. (HSTP214_0001)*

Response: Comment noted. Thank you.

Comment: *No. In fact, we almost had an agreement done. We worked with Rocky Mountain Power. The problem is when Lower Valley and Bonneville opted out, we couldn't wait for them to opt back in, so we've had to put those lines into those locations. The rerouting of some of Rocky Mountain Power's line to get it in the right spots through the Blackfoot Ridge mine has already been done. I'm not saying that it couldn't be redone, but it would certainly cost more money that if they had done that originally. (HSTP214_0004)*

Response: Comment noted.

Comment: *I work for Rocky Mountain Power. If someone wanted to join the same structure to go through there, it really would interfere with the line. We tried to work to make basically a joint pole. We would be the lower on it. Going through part of their mine it has to be on the same pole. If not, they don't have a place to put the poles is part of the problem. (HSTP214_0004)*

Response: Comment noted.

Comment: *Having made our thoughts known again we will NOT be giving permission at this time to Bonneville Power or their associates for access to our barn area for any reason including soil samples or appraisals. (*

Response: Comment noted.

Comment: *This past week, I have been contacted by surveyors and appraisers who are requesting access to our land. We will grant no access. (HSTP214_0010)*

Response: Comment noted.

Comment: *Fall River is supportive of the Hooper Springs Transmission Project. (HSTP214 0012)*

Response: Comment noted. Thank you.

Comment: *Over the past six years, as you are aware, Agrium has expended a great deal of effort and expense, including the time of our staff, consultants and legal counsel, to coordinate with and respond to the multiple requests from BPA and its contractors. While Agrium and BPA have been discussing a reimbursement agreement, Agrium would like to proceed with putting a formal written agreement in place to cover the reimbursement of our time working on the BPA project. We look forward to resolving this issue with you and continuing our work on the project. (HSTP214_0018)*

Response: BPA is continuing to work with Agrium on the concerns raised in the comment.

Comment: *In general, Agrium is supportive of the Hooper Springs Transmission Line project provided the aforementioned concerns can be satisfactory resolved. (HSTP214_0018)*

Response: Comment noted.

Comment: *Ultimately the users who would benefit from this line should bear the financial cost of such improvements, not BPA. (HSTP214_0019)*

Response: Comment noted.

Comment: *I believe it is time for BPA to modernize the approach for this proposal and reduce conflicts with the citizens of Caribou County, wildlife, and other uses. (HSTP214_0019)*

Response: Comment noted.

Comment: *Simplot became aware in 2008 that a new electrical transmission line was under consideration for a route north and east of Soda Springs, Idaho. As a business owner accustomed to electrical service outages for our operations and with employees who are accustomed to electrical service outages for our operations and with employees who are members of the communities in Caribou County, we welcome the opportunity for improving electrical service and capacity for the southeastern corner of Idaho. (HSTP214_0020)*

Response: Comment noted.

Comment: *Simplot remains open to working with BPA and Lower Valley on providing access onto Simplot-owned land to assist with the successful completion of this project.—Simplot remains a strong advocate for the construction of the Hooper Valley Transmission Project, regardless of the ultimate route chosen. Although we believe it is most appropriate that a project intended to serve the public is better placed on public land where possible, Simplot is committed to provide the rights to use Simplot land if necessary to build the infrastructure that will improve the economic sustainability of this region. (HSTP214_0020)*

Response: Comment noted.

Comment: *It seems likely that Lower Valley Energy will not have much excess electricity to send to our energy users during our peak demand times that sometimes directly affects our local industries' production. With this in mind, it seems obvious that Caribou county has very little to gain in being host to this proposed power line. An issue that could be of benefit to the industries of Caribou County is to rectify any errors with them that is not limited to but would include the complete reversal of "the Magnussen Clause" and its implications. (HSTP214_0022)*

Response: Comment noted. It is hard to predict system conditions when excess power would be needed in Caribou County.

The "Magnuson Clause" mentioned by the commenter refers to a provision in an appropriations bill from the 1960s in which BPA was prohibited by Congress from selling power to

phosphorous electric furnace plants that were already, or could be, served by private power companies.

Comment: *Upon reviewing the comments submitted on your website, I find that the majority of them are in favor of Option #1 rather than Option #3 which is the option currently being proposed by your organization. I only found one comment supporting your current option, and he/she had only one line of supporting information - it would affect his/her farmland. Having grown up in the Soda Springs area in a farming family, I am very familiar with the farmers who own a lot of land in the area and this farmer is not one of them; therefore, if he/she is affected it would be in a much smaller proportion than the dozen other farmers who would be affected by Option #3 (Browns, Torgesens, Murdocks, Cranes, etc.). (HSTP214_0028)*

Response: Comment noted.

Comment: *We appreciate the development of a Supplemental Draft Environmental Impact Statement to further analyze alternatives and describe impacts of this project. (HSTP214_0030)*

Response: Comment noted. Thank you.

Comment: *By effectively disqualifying the Non-Wires Alternative from further consideration with a now-arbitrary time frame, we believe that BPA is in danger of proceeding in an arbitrary and capricious manner. We believe that now is the best time for BPA to review its analysis and address these oversights in a Supplemental SDEIS. (HSTP214_0030)*

Response: As described above, BPA has evaluated a full range of reasonable alternatives, including evaluating the non-wires alternatives in the recently released supplemental draft EIS. The non-wires alternatives have been eliminated from further detailed consideration because these alternatives could at most defer, but not eliminate, the need to construct a transmission line.

Comment: *While the Hooper Springs scenario is greatly different, there may be some similarities, particularly with regard to mitigation and enhancement strategies. Please incorporate the RAC's recommendations with our comments. (HSTP214_0030)*

Response: BPA has included the RAC's recommendations for the Morley Nelson Snake River Birds of Prey National Conservation Area as part of the Gateway West Transmission Line Project. As the commenter recognizes, BPA's proposed project is different than the Gateway West project. However, BPA is happy to receive information regarding types of mitigation related to transmission line projects.

Comment: *The Department of the Interior has reviewed the Supplemental Draft Environmental Impact Statement for Hooper Springs Transmission Project, Caribou County, Idaho. The Department has no comments on the document at this time. (HSTP214_0034)*

Response: Comment noted.

Comment: *In our comments on the draft EIS in April 2013, the EPA expressed concerns about the proposed project due to its potential impacts to water, land use and farmlands, and vegetation and wildlife resources. We appreciate BPA responses to our comments in the SDEIS. In particular, we are pleased with BPA's anticipated measures to protect water resources and avoid sensitive resource areas, such as the Blackfoot River Wildlife Management Area and wetlands, as much as possible. (HSTP214_0035)*

Response: Comment noted. Thank you.

Comment: *Based on our review, we believe that the SDEIS provides adequate discussion of the potential environmental impacts associated with the proposed action, including the additional route option 3A. The EPA, therefore, has rated the SDEIS as LO (Lack of Objections). An explanation of this rating is enclosed for your reference. (HSTP214_0035)*

Response: Comment noted. Thank you.

Comment: *The OER appreciates Bonneville Power Administration's (BPA) willingness to explore the southern routes as alternatives moving forward with this project. Through hard work and collaboration with the OER, BPA drafted the southern alternatives that are preferable to the OER because they have the least amount of impact on the citizens and resources within the project area. (HSTP214_0037)*

Response: Comment noted. Thank you.

Comment: *The Idaho Department of Lands, the Idaho Department of Parks and Recreation, and the Idaho State Historic Preservation office do not have specific comments on the SDEIS and will continue to be engaged in the National Environmental Policy Act process for this project. (HSTP214_0037)*

Response: Comment noted.

Comment: *Now that we have more knowledge about the transmission line we don't give permission to enter our property. We understand if all property owners don't accept the line it cannot be put in. (HSTP214_0038)*

Response: Comment noted.

3.6 Appendices

3.6.1 Forest Plan Amendment

Comment: *Furthermore, Guideline 2 of the Caribou Forest Plan for sage-grouse states that management activities should consider proximity to active lek locations during site-specific project planning. Those within 10 miles of an active sage-grouse lek should be considered further for suitability as grouse habitat. Despite one passage in the SDEIS stating that the Caribou-Targhee contained no sage-grouse habitat, a sage-grouse was seen on C-TNF land in 2007. (HSTP214_0030)*

Response: No active sage-grouse leks were documented on C-TNF within 10 miles of the preferred alternative. The sage-grouse leks in the vicinity of the project are to the southwest of the C-TNF boundary. The proximity of these lek sites were considered in the overall process for siting the line along with a variety of other considerations. BPA recognizes the importance of high quality habitat and has sited the transmission line to avoid active lek sites, and both BLM-defined preliminary priority habitat and preliminary general habitat. As listed in the mitigation section of the supplemental DEIS, BPA would do the following to address sage-grouse concerns:

- Conduct pre-construction surveys for sage and Columbian sharp-tailed grouse leks in sagebrush habitats.
- Prohibit construction activity within 10 miles of an active greater sage-grouse lek and within 2 miles of active Columbian sharp-tailed grouse leks between the end of March and mid-May, when possible.
- Avoid manipulating or altering sagebrush stands with tall, relatively thick sagebrush that are suitable as grouse nesting habitat during the nesting period (May to June).

Comment: *We note that Guideline 5 for the Caribou National Forest specifically states that before new corridors are approved, consideration should be given to uprating, multiple circuiting, among other measures.*[6]

It appears as though some of the alternatives examined in the 1998 Lower Valley Power and Light Transmission System Reinforcement Project EIS[7] *could apply to this situation. This could include double hanging the Palisades-Snake Line. (HSTP214_0030)*

[6] Hooper Springs SDEIS p. A-13.

Response: As described above, one of the main issues in this service area is that the entire load is currently served from Goshen Substation. The two main source lines into the area are in the same ROW for more than 20 miles leaving the region susceptible to loss of the entire load from a single event (such as a brush fire or a lightning strike). The proposed Project provides a second source line into the area that would be able to support at least some of the load during a catastrophic event. Uprating or multiple circuiting existing ROW would not solve the problem where the entire region is served from one substation. For this reason, BPA determined that the Hooper Springs Transmission Project (building a new line) is needed to provide reliable service to the area.

[7] http://energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/EIS-0267-FEIS-Summary-1998.pdf

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4 Comment Letters

Copies of the comment letters, comment forms, and emails received on the supplemental draft EIS, as well as oral comments from the public meeting follow this page. Correspondence was designated with an identifying log number based on the order in which the item was received.

Table 4-1. List of Correspondence and Commenters

Log No.	Name	Affiliation/State
HSTP214_0001	Karen Crane	Idaho
HSTP214_0002	Keller Crane	Idaho
HSTP214_0003	Lewis Brothers, Inc.	Idaho
HSTP214_0004		Varied
HSTP214_0005	Jade Gomez	Idaho
HSTP214_0006	Jeff Godfrey	Idaho
HSTP214_0007	Karen and Keller Crane	Idaho
HSTP214_0008	Drew Dredge	Idaho
HSTP214_0009	George and Renee Perschon	Idaho
HSTP214_0010	Susan Smith	Idaho
HSTP214_0011	Julianna Godfrey	Idaho
HSTP214_0012	Bryan Case	Fall River Rural Electric Cooperative
HSTP214_0013	Al Kackley	Idaho
HSTP214_0014	Ross Wilde	Idaho
HSTP214_0016	Greg Torgesen	Idaho
HSTP214_0018	Jon Goode	Nu-West Industries, Inc.
HSTP214_0019	Roderick Drewien	Idaho
HSTP214_0020	Alan Prouty	J.R. Simplot Company
HSTP214_0021	Greg Mladenka	State of Idaho, Department of Environmental Quality
HSTP214_0022	Earl Somsen, Phil Christensen, and Mark Mathews	Caribou County Commissioners
HSTP214_0023	Kathy Rinaldi and Bob Zimmer	Greater Yellowstone Coalition
HSTP214_0024		Idaho
HSTP214_0025	Cole	Idaho
HSTP214_0026	Ben Torgesen	Idaho
HSTP214_0027	Cole	Idaho
HSTP214_0028	Jeremiah Torgesen	Idaho

Log No.	Name	Affiliation/State
HSTP214_0029	Tami Cole	Idaho
HSTP214_0030	John Robison	Idaho Conservation League
HSTP214_0034	Allison O'Brien	U.S. Department of the Interior, Office of Environmental Policy and Compliance
HSTP214_0035	Christine Reichgott	U.S. Environmental Protection Agency Region 10
HSTP214_0037	John Chatburn	Idaho Governor's Office of Energy Resources
HSTP214_0038	Anonymous	Unknown
HSTP214_0039	Romelia Martinez	Shoshone-Bannock Tribes

BONNEVILLE POWER ADMINISTRATION

HOOPER SPRINGS TRANSMISSION PROJECT

"I'd like to tell you..."

Please have your studies look at:

I need more information about:

I have these other comments: 5-10-14

My only proposal is to encourage Bonneville Power to use their considerable negotiating skills to work with Monsanto + Agrium about the phase mod of new poles along a route that already has poles. Or perhaps some where in the back country that wasn't not encroach upon the scenic by-way or our little community of China Hat.

Our suggestion to consider is along our south fence line with poles with just that "a suggestion" to keep the poles out of the middle of our field + away from our front entrance to the horse barn.

Name/Ad

Please mention "*Hooper Springs Transmission Project*" in your correspondence.

The comment period ends August 7, 2014.

I appreciate Joe, Mike, Eric, Luke, Shannon + 2 others coming to visit with us at the horse barn at China Hat on April 30 2014 to discuss the issue of pole placement. Thank you to all of them for making the effort.

Karen

BONNEVILLE POWER ADMINISTRATION

HOOPER SPRINGS TRANSMISSION PROJECT

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Please mention "*Hooper Springs Transmission Project*" in your correspondence.

The comment period ends August 7, 2014.

- HSTP214 0003 - Lewis/Lewis Bros. Inc.

  This comment is in conjunction with the meeting being held in Soda Springs, Idaho on May 27, 2014. My brother and I own Lewis Bros., Inc with farm ground located at Henry Idaho. We met with you about a year ago at Henry to discuss the transmission routes you were proposing through our farm ground. We were very much opposed to that route for your transmission lines. The new preferred 3A you are proposing is a better alternative and does not affect the local farmers by putting transmission lines through their farms, including our farm at Henry. We are fully in support of this route.

BONNEVILLE POWER ADMINISTRATION

HOOPER SPRINGS TRANSMISSION PROJECT

PUBLIC HEARING

*****

TIGERT MIDDLE SCHOOL

SODA SPRINGS, IDAHO

MAY 27, 2014

*****

MS. MARYAM ASGHARIAN: Okay. We're now ready for public comment or any questions.

UNIDENTIFIED SPEAKER: On the big maps you have back here, the black line is that your preferred route?

MS. TISH EATON: The north alternative -- the first three pages on that side, the pink line is option 3-A. If you're looking at those four photos, at the black line, that's the north alternative.

UNIDENTIFIED SPEAKER: Do you have your preferred route marked?

MS. TISH EATON: Yes, it is. It's on the first three maps in pink. It's says option 3-A on it. We can show you.

MS. KAREN CRANE: Karen Crane. My question is what makes that route the preferred route over the others?

MR. ERICH ORTH: The last time we met with you folks on the draft EIS, we did not have a preferred. We went through and did an analysis, but didn't feel comfortable making a preferred alternative decision at that time.

Since then we've gone through and we further investigated that south alternative and did our environmental analysis. And basically, looking at all of the environmental impacts of the north and south alternative and each of the options, determined that that

south alternative, option 3-A, was the least impactful.

MS. KAREN CRANE: The least impact on what? The environment?

MR. ERICH ORTH: In our EIS we cover 13 different chapters. We cover cultural resources, visual impact, wildlife, fish, socio-economics.

MS. TISH EATON: Soil, vegetation.

MR. ERICH ORTH: We analyze a whole variety of environmental impacts. I don't know if I covered wetlands, creeks. So looking at the impacts of the north alternative, there's a lot of resources on the north alternative that we were going to be impacting that with the south we are not going to be impacting.

MS. KAREN CRANE: So what you're telling me, then, is, if I'm understanding what you're saying, the environmental impact is more important to you than the impact to the people involved that you are coming through?

MR. ERICH ORTH: We certainly take everyone's comments into play. As a federal agency we do have to comply with EPA, which is an environmental review and analysis of the impacts we'll have on the environment. Yes, it does factor in in how we make a choice for the preferred alternative. But the people do matter. We certainly encourage comments and do take them and factor them into our decision making, as well as cost, another

factor that plays into the decision.

MS. TISH EATON: And purpose and need as far as reliability.

MR. ERICH ORTH: Yeah. You know, the bottom line is we are trying to meet the purpose and need of the project, but then we have a lot of factors to evaluate.

MR. GREG TORGESEN: Greg Torgesen from Soda Springs. My question goes along with Karen's. As far as the choice on this preferred route where you turned to the east and then parallel the highway, what drives that decision to parallel the highway versus staying away longer and then crossing at just one point?

MR. ERICH ORTH: There were some different factors. We've got China Hat Road that we follow. Whenever we follow a county road or the state highway provides some really good access where we don't have to be trucking across a bunch of farm fields and impacting the farmers and private landowners. There is some decision made by input from landowners, so that helped us make some decisions in routing. Those are some of the reasons. But it does give us better access.

A lot of the maintenance, after the line is built, is just visual, just doing a drive-by and doing a visual check on the structures. If we can do that from the county rode without impeding traffic, that eliminates

cost in the long-term.

MR. EARL SOMSEN: Erich, long time no see. I apologize for being late. I don't know what stage of the meeting you are in. Are you in the comments?

MR. ERICH ORTH: Yes, we're in the comment period. Tish and I gave a little spiel about where we were and some general elements of the preferred alternative.

MR. SOMSEN: One thing I'm still interested in, and by the way I do highly prefer the south alternative, but can you explain to me what all it is that is stopping you from following the Monsanto Haul Road into Conda and staying over out of sight and off of Agrium ground?

MR. ERICH ORTH: Kind of part of the original routing?

MR. EARL SOMSEN: Yeah. That stays along the Monsanto Haul Road.

MR. ERICH ORTH: Well, maybe Tish can help us.

MS. TISH EATON: There are definitely more wetland impacts there. I think that in looking at this, when we were in the field there is active mining going on right here. I think the concern -- I might be speaking out of turn. The concern was when you come up through here we were proposing to put a line right through an active mine. When we were out there, there was a tower that was already high and dry with things excavated around it. So I think

when we consider reliability that doesn't look like an area that we would -- that is very good for a transmission line right through an active mine.

MR. ERICH ORTH: I think there would also be safety concerns on long-term maintenance. If we were having to get 24 hour access in there and if there was active mining going on it could present some safety hazards for our maintenance folks.

MS. TISH EATON: And this Woodall Springs right here is a huge wetland. That's a pretty big deterrent to putting towers and a line across a wetland.

MR. EARL SOMSEN: I understand that that is fraught with problems going across wetlands no matter what you do. Is there no way that you could go across higher ground and not go across the bottoms and still follow that east side of the valley? Do you have to go down into the wetlands I guess is what I'm asking?

MS. TISH EATON: Are you saying come across out here?

MR. EARL SOMSEN: I'm not sure where that map is showing. Okay. Along through here, yes. Option one, I guess, basically following from over here and coming across and avoiding all the agricultural land. That's a huge issue for the farmers who are going to be stuck with those poles in their field because they'll have to farm

around those from now on.

And there is another issue too, that once they're on there, as I understand it, it becomes the landowner's responsibility if they happen to damage the poles or anything.

MR. ERICH ORTH: It can and can't. It depends on the act and what is involved.

MR. EARL SOMSEN: Anyway, bottom line, it's a huge nuisance for agriculture to deal with. If there is another option that we could take that would avoid those lands, you wouldn't be having a lot of the comments that I think you'll have tonight. I don't know what all you require to have it so that it's acceptable to go across that, but it sure looks like somebody had the right idea when they had that line going over to Conda.

MR. ERICH ORTH: Jimmy, come on up. This is Jimmy Buker. He was actually our lead designer originally for Lower Valley. I know there is a bit of a pinch point and a big pond there at Eight Mile.

MR. JIMMY BUKER: We worked a lot in that area extensively with Monsanto, working to get the line through there. You have the railroad, you have the pond, and you also have a Rocky Mountain line that runs through there. We did quite a bit of routing that through there.

MS. TISH EATON: It crosses the road many times.

MR. JIMMY BUKER: Not too many times. We crossed the road pretty much on this side the whole way.

MR. VAUGHN RASMUSSEN: If memory serves, there was two times it crossed. It was at the high points, it wasn't at the low points in the road. It was way above any kind of --

UNIDENTIFIED SPEAKER: So there would be no danger or risk of coming in contact with the wires?

MR. VAUGHN RASMUSSEN: The only areas where there was any kind of issue at all was coming right through the mine. We have a power line that comes through there with Rocky Mountain Power and we worked out an agreement with them to put that on the same line and locate it in places where it wouldn't impact the Monsanto line.

MR. JIMMY BUKER: We utilized both Monsanto's safety practices as well as national safety code values to come up with the clearances necessary for safety through there.

UNIDENTIFIED SPEAKER: That's why that Rocky Mountain Power line goes through there is because it's up on a hill and avoids the farm land more.

UNIDENTIFIED SPEAKER: That's a good idea. Just go farther up the hill.

UNIDENTIFIED SPEAKER: Is there no way that you could parallel that line and stay where you need to be?

Is there room enough for another line if there's one already going through it?

MR. ERICH ORTH: Well, it would push it further up the hill requiring more roads. And then there was some concern about Monsanto, or whoever owns the land, what they might do with future mining activities. We wouldn't want to build a line where we know we might need to move it in the near future.

UNIDENTIFIED SPEAKER: That would be in an area that Monsanto would mine I assume?

MR. ERICH ORTH: Yes.

MR. JIM SMITH: That area of the mine would be the Blackfoot Ridge mine. That's all been permitted. That is the only lease I'm aware of. When you move beyond it there are some other potential mine sites as you go up the valley, but those are -- that's the only one there that gaps where you turn to go up.

UNIDENTIFIED SPEAKER: Are there any others up the valley that would interfere with a power line?

UNIDENTIFIED SPEAKER: We reviewed that with Lower Valley and the EPA where there might be impacts. There's a few places where we might cross underneath a line and so we wanted to be sure there was clearance. We didn't locate anything in terms of Monsanto.

We also have Agrium and Simplot who may have

some. I can't speak for them. We reviewed that with them. Originally with Lower Valley.

UNIDENTIFIED SPEAKER: Does Monsanto have any issues with the line going that way?

MR. JIM SMITH: No. In fact, we almost had an agreement done. We worked with Rocky Mountain Power. The problem is when Lower Valley and Bonneville opted out, we couldn't wait for them to opt back in, so we've had to put those lines into those locations. The rerouting of some of Rocky Mountain Power's line to get it in the right spots through the Blackfoot Ridge mine has already been done. I'm not saying that it couldn't be redone, but it would certainly cost more money than if they had done that originally.

MR. VAUGHN RASMUSSEN: I work for Rocky Mountain Power. If someone wanted to join the same structure to go through there, it really would interfere with the line. We tried to work to make basically a joint pole. We would be the lower on it. Going through part of their mine it has to be on the same pole. If not, they don't have a place to put the poles is part of the problem.

MR. JIMMY BUKER: And these are the 180 and 150 foot tall poles?

MR. VAUGHN RASMUSSEN: Yeah.

UNIDENTIFIED SPEAKER: Have you got any kind of an

idea what it would be to have it so both lines could be on one pole?

MR. VAUGHN RASMUSSEN: Actually there was a cost put together five years ago. I can't quote the cost right now. You'd have to actually go back and review and look at all that to see what it would cost.

UNIDENTIFIED SPEAKER: Do you remember what it was then?

MR. VAUGHN RASMUSSEN: I can't, commissioner. I can't.

MS. LORI ANNE LAU: I'm Lori Anne Lau. I guess what I'm trying to understand, if you have -- I know it might have worked at the very beginning, but we're not at the beginning, so now that your guys's lines are going through there is it still viable to put their lines through there or it just too expensive and we need to be out in the valley?

MR. VAUGHN RASMUSSEN: That's a decision they have to make. I know we'll work with them if they decide to do that. Also understand that when you start to look at 180 and 190 foot poles you increase the cost of the job quite a bit. That's part of the issue too. The other part is a lot of this will have to be done live. We can't take a line out. If we have to move the line, once we move it it basically feeds all the lines in the valley. That creates

an issue for us.

MS. LORI ANNE LAU: So it would be a lot more complicated, but still theoretically doable?

MR. VAUGHN RASMUSSEN: Anything is doable if you can afford to pay for it. That's really the bottom line.

MR. ERICH ORTH: That's true.

MS. LORI ANNE LAU: I haven't studied the map, but all of the lines on the southern route could all come together more or less. In what proximity to the river and the roads?

MR. JIMMY BUKER: This section?

MS. LORI ANNE LAU: Yeah. East from the China Hat area.

MR. ERICH ORTH: Starting way back here or kind of right in here?

MS. LORI ANNE LAU: From there on are we close to the road or close to --

MR. ERICH ORTH: Yeah. You cross the Monsanto Haul Road kind of right in here. So we cross that and then try to stay closer to the road for access, for visual inspections and for -- stay right off of the county road for right-of-way.

MS. LORI ANNE LAU: One other question. We have a power line that goes through us going off the other direction. All we ever see of them is when they come over

in the helicopters. Every now and again they send somebody out to look at them on the ground.

You'll be buying easements, potentially, from the people in the valley. What are the -- what kind of constraints -- once this is built, do you envision any constraints on what they can do, because it's a pretty wide thing you want to put in there?

MR. ERICH ORTH: Typically, and help me out Joe, the easement itself can be rather restricted to the landowner. We don't want any -- Bonneville tries to keep the hole 100 feet clear except for low growing vegetation. We don't want a tree to grow up in there. Typically grazing is just fine and then farming of low-growing plants.

MR. JIMMY BUKER: Native agriculture to this valley doesn't impact much.

MS. LORI ANNE LAU: So we can have cows and grow barley?

MR. JIMMY BUKER: Yes. We're looking at different kinds of crops like if you wanted to put in an orchard, a tree farm, those sorts of things, because of the height it's then a problem.

MS. LORI ANNE LAU: If we have a crop of barley and you want to drive through it, we're just SOL?

MR. JOE COTTRELL: No. Do you want me to talk on

this?

MR. ERICH ORTH: Sure. Come on up.

MR. JOE COTTRELL: I'm Joe Cottrell, one of the realty specialists for Bonneville Power. We have a team of agents here that work with me tonight.

The answer to your question, ma'am, when we build the project, if we go out and a truck causes damage to your property, we tear a gate down, whatever, we'll pay for that. We'll make the situation right. After the project is built, you are still the landowner. We have an easement to utilize the access road and utilize the right-of-way. If we don't have to construct a road and put rock down that's the way we want to go. That means you can plow over it, you can grow whatever you want to grow. If our engineers say we have to build a road, we have to put rock down, then we will.

After we get the line built, usually we're going to have -- our line crew has a requirement that once a year they have to travel every mile of our transmission lines, which is 15,000 miles in six states. So you'll see a foreman three, who works out of our Idaho Falls office. One of his crew members will be showing up. Our natural resource specialist is out of Montana. He runs the lines. Or myself as a realty specialist. We normally will give you a call, let you know that we're coming. Sometimes

they might not, depending on what arrangement we have with each landowner.

So normally, after we build the line, you won't see us that much unless we have a lightening strike, an outage, some problem we have to deal with. But if somebody damages your land, we pay for the damages.

MR. ERICH ORTH: If we have once a year maintenance, we try to time it so it would be shortly after you cut your crop, say, so we're not having to plow through your land then have to pay for it.

MS. LORI ANNE LAU: Okay. I have to go. Sorry.

MR. JOE COTTRELL: Just to let everybody know, we do have one of our appraisers here tonight, Larry Zumwalt. If anybody has any questions about valuations, Larry would be happy to answer those.

MR. ERICH ORTH: One thing too that I forgot to mention, just kind of some general activities that we have planned this summer as we continue down the path to get to a final EIS, as Joe mentioned with our appraiser, we are going to start honing in on what it would cost to purchase easements. We'll start with the south alternative and then work on the north.

MS. TISH EATON: Option 3-A.

MR. ERICH ORTH: Option 3-A, excuse me. And so the appraisers will be contacting those individuals that we

propose to have an easement across their land and try and evaluate and get an appraisal value for those easements to help us make a better decision in the end as far as whether or not to build the project. So those activities would start in late June, maybe early July.

We have some additional surveying and staking to do out there on the proposed right-of-way on those lands that folks are allowing us to go on. You'll see that going on. And then we have some additional geo-technical exploration to do on option 3-A along the Blackfoot River where it takes off from Highway 34 towards the Narrows. So that's drill rigs and drilling some small holes to help get better information on the soil characteristics so we can properly design the foundations.

UNIDENTIFIED SPEAKER: Back to the towers. You folks have been around those quite a bit. Have you got kind of a ballpark idea what it costs for one of those towers, the tall ones?

MR. ERICH ORTH: The majority of the towers are what we call a suspension tower and it kind of just holds the wires up. A 90-foot tall tower, gosh, I'm going to guess probably 30 to 35 grand.

UNIDENTIFIED SPEAKER: Is that the size that would be needed out there or what size are you talking? Taller than that, having both power company transmission lines

together?

MR. JIMMY BUKER: That would be potentially three times the cost. That is a guess completely.

UNIDENTIFIED SPEAKER: And what did you say it was?

MR. ERICH ORTH: About 30,000.

UNIDENTIFIED SPEAKER: So 90 to a hundred thousand dollars a tower?

MR. ERICH ORTH: Yes.

UNIDENTIFIED SPEAKER: How many of them to get across?

MR. ERICH ORTH: At least two tall ones.

UNIDENTIFIED SPEAKER: Do you remember how many poles there were?

MR. JIMMY BUKER: Originally two. They were the really tall ones. Those are the ones right at the fish pond. I can't remember, did we have -- it was just those two towers?

UNIDENTIFIED SPEAKER: I think it was only two. Two, maybe three, but I think we came up with two.

MR. JIMMY BUKER: Then we were parallel up to that point and then from that point.

UNIDENTIFIED SPEAKER: The reason we went there is because it went right through the mine. We wanted to make a small footprint, keep it as small as we could.

MR. ERICH ORTH: I know the numbers are clicking.

MR. VAUGHN RASMUSSEN: You have to realize, commissioner, he's giving you a price and saying three times as much, but the taller you go it doesn't work three times sometimes.

UNIDENTIFIED SPEAKER: Probably more, I understand.

MR. JIMMY BUKER: Not only are you going taller, you're going bigger around. It's just a lot more pounds of steel.

MR. ERICH ORTH: And if we have a line that Rocky Mountain Power says we can't take out of service and we need maintenance on our line, then we need to provide access and a landing location for a rather large rig to get in to work that and stay out of the energized space that Rocky Mountain has below us. So it creates more cost for maintenance and operation long-term. Then there's also a safety component as well.

MR. JIMMY BUKER: It would be a lot more cost. Bigger equipment, bigger cranes. And working any power line hot is a safety concern, a very large safety concern. That is also a cost.

UNIDENTIFIED SPEAKER: I can sympathize with that. Those are justified statements. I'm thinking, though, the price of the poles may be pretty much equaled out from what you wouldn't have to pay for easements to get across a lot of the properties. I don't know. I don't know how

much you figure on paying folks that your power line goes through. Even if that was $300,000 for those two poles, I'll bet you it comes pretty close to what you'll have to pay for easements to get across there. Just a guess.

MR. ERICH ORTH: Sure. And that's part of the reason why we're starting the appraisal process this summer.

UNIDENTIFIED SPEAKER: The deal for safety is a huge issue, I understand, and having to deal with hot wires. I still would like to have it looked at anyway.

MR. ERICH ORTH: Okay. John.

MR. JOHN TIPPETS: For the record, John Tippets, state senator and an employee of Agrium. I've got a question about compensation. You mentioned that you're starting the appraisal process, you're making offers to landowners. I know that eventually, if a landowner is not willing to sell you an easement, that you can take an easement through the eminent domain process.

If a landowner chooses not to accept your offer and you pursue the legal process to take the land through eminent domain, at that point how do you determine the value of the offer to the landowner? I'm guessing you probably don't go back to that original offer you made. How does that process work?

MR. ERICH ORTH: Joe can take this.

MR. JOE COTTRELL: It's a great question. To clarify, Bonneville Power as a federal entity does have eminent domain condemnation authority. It's a tool in the tool box that is the last tool. We hardly ever bring it up so thank you for an opportunity to explain it.

It's a very detailed process. It actually goes above Erich and anybody else here. And the actual approval, if we do a condemnation, is signed off by the administrator of Bonneville Power, so directly at the top.

We do the appraisal. We have a contractor from Boise that will do the appraisal. Larry is the federal appraiser. Whatever that fair market valuation is is what Bonneville presents as its first offer. If the landowner -- when we get to negotiations and the landowner says no, I don't want to sell, we'll do everything we can to come up with creative ways to try and work a mutually agreeable deal.

Obviously, there's going to be some deals that you can't find middle ground on, which is why condemnation is there. If you have ninety landowners in agreement and three that are not, the project probably is going to have to continue forward for the good of the public, although those three landowners don't see it that way. When we have that situation, it comes into a situation where the Department of Justice takes over and BPA steps out. DOJ

takes over the condemnation and they move forward with the process.

The landowner has the right to get their own appraisal. So before we get to that route, and if there's a disagreement in value, the landowner has the right to do an appraisal and compete against the appraisal our appraiser came up with. So if we have apples and apples, and we've got five or ten thousand dollars worth of difference, and if there's justification, as a realty specialist myself I have the authority to write a justification to exceed fair market value. But it has to be based on fact, it can't be emotional. It can't be because we think it's worth $10,000 an acre more. It has to be based on criteria that I can actually justify to the U.S. government why we're paying more money.

And we do that quite often. You guys know the property better than we do. If there's a certain part of your fields that are producing at a rate that maybe the other parts are not and that's the part we're going to impact, that will be justification to maybe pay more for that area of your fields.

Long story short, to get back to the condemnation, once the DOJ steps in and we step back, the DOJ might review the appraisal and they might think the value you have is justified and so the DOJ might have

another appraisal done. That's really where we get into the valuations.

There's a lot of different options. It's not really cookie cutter one set way. It really depends on where we're at with the valuations. If we can come to an agreement with the outsourced appraisals, great. If it goes into condemnation, DOJ might request -- we have a project right now that Bonneville had several condemnations on in Washington. DOJ stepped in and brought in additional appraisers and are having it reevaluated.

MR. JOHN TIPPETS: So let me oversimplify, but to make sure I'm right, when you start the process you start with a air market value, but you have the ability to negotiate and sweeten the deal for the landowner if you think it's appropriate?

MR. JOE COTTRELL: Correct.

MR. JOHN TIPPETS: If that doesn't work and you go to the condemnation process, and the Department of Justice comes in, they'll start either with the original fair market value appraisal or they can get another one. The question is, at that point the DOJ still has some flexibility to negotiate with the landowner before they actually condemn the property?

MR. JOE COTTRELL: Yes. They can come back to the

agency and say Bonneville Power, we think you need to relook at this. We're seeing some discrepancies in your numbers. Or they can actually look at handling the compensation through the DOJ themselves.

MR. JOHN TIPPETS: You probably can't answer this question, but I'll ask it anyway. I'm trying to determine whether or not there's any advantage for the landowner to accept some sort of a deal upfront before they go into the condemnation process. What I'm hearing from you is not necessarily, because there's still some opportunity to negotiate with the Department of Justice and it's not necessarily to the landowner's advantage to accept the offer from you guys initially and not let it go to condemnation.

MR. JOE COTTRELL: Let me clarify that. Larry, if you have a comment, chime in. We have had situations on multiple protects -- Bonneville hasn't condemned a lot in the past compared with the growth rate that we're at. We have had situations in the past where the outsourced appraisal or the condemnation authority have come up with an evaluation that was lower than what BPA's original value was. So it's a poker game. What do you think your chances are on the lottery situation? We try to be as fair as we can. That's partly the reason why our appraisers are out of our headquarters office. That's why

we try to hire local appraisers because they know the property values around here better than anybody else.

MR. JOHN TIPPETS: So what I'm hearing from you is that rather than going to the condemnation process, you'll do everything that you can, that you believe is reasonable, to try to come to an agreement with the landowner and you'll make essentially your best offer?

MR. JOE COTTRELL: Yes. Fortunately we have the ability to negotiate. That's the definition of negotiation is with both sides. With most landowners we try to -- part of our task as a federal entity is to treat everybody fairly and equally. If the appraisal group comes up with a valuation of X amount per square foot, per acre, whatever that base price is on whatever property, that's going to be the basis for what we offer each landowner. But each landowner's property is unique. Once we're out there and actually review it there might be circumstances that one landowner has that makes their property more valuable than another landowner.

MR. JOHN TIPPETS: Thank you. Very helpful.

MR. ERICH ORTH: If I can add one thing, too, it behooves us to not go to condemnation because we end up paying those attorney fees to the Department of Justice and that is not cheap for us. We would rather not go there and keep it internal with Bonneville if at all

possible.

MR. KELLER CRANE: Keller Crane. There's one option that you guys had earlier in this process three or four years ago. I haven't heard much of it since. This is mostly a shuttle line and you did have the option of not building it. I think that's the best option you've got.

MS. TISH EATON: We are still considering the no action alternative. That's also a consideration.

MR. KELLER CRANE: As far as I'm concerned, that's a kind of band-aid on the deal anyway.

MR. ERICH ORTH: Comment noted. Thank you.

UNIDENTIFIED SPEAKER: Can you explain the rules that govern how close you can locate the poles to, say, a county road or a state highway?

MR. ERICH ORTH: Bonneville wouldn't want to overlap our right-of-way with a county right-of-way. If the county wants to expand it at some point, or the state, then all of a sudden we have a line that might end up too close to traffic and then we have to move our line out. They have certain rights as well so we may not get -- be able to have an overlap.

In our surveying and mapping we try to butt those easements up as much as possible so there's not, you know, this 20-foot gap that the landowner has that's

pretty much worthless between two utility easements. But if it comes down to safety, how close, we really don't want them overlapping those two easements, a road easement and a utility easement with another agency. That would go for an underground buried natural gas pipeline. We may cross over the top of it, but we wouldn't want to have them overlapping.

UNIDENTIFIED SPEAKER: Okay. Well, I guess one follow up. Then within your right-of-way, how close to the edge of your right-of-way are you able to locate a pole? Just down the center?

MR. ERICH ORTH: That's a good question. We would go right down the center. So this single steel pole we would have 50 feet of easement on one side and 50 feet on the other side.

UNIDENTIFIED SPEAKER: The pole is usually in the center line.

MR. ERICH ORTH: Sometimes when we make an angle there might be a couple of feet offset, but in general we want to go right down the middle of that easement.

What our engineers do is they look at how much that wire is going to swing out in the wind. And put a little ice on it and it gets windy is that going to swing out and perhaps get too close to a building that is built on the edge of the easement. That is public safety. So

we analyze that. There's a swing analysis that our engineers go through to determine that. A 100-foot easement is basically the safest that we can meet with a right-of-way.

We do have a number of experts here, engineering, the transmission line folks, access road folks. We have most of our realty team here, anywhere from realty agents, our HDR folks that Shannon Graham is helping manage. We have Bonneville realty folks and our appraiser Larry Zumwalt is here. We would encourage you to stick around if you want and ask questions. And please make written comments. We appreciate that. That's the best way to get your comments into the EIS.

We also have a few copies of the supplemental draft EIS floating around. If you made a comment in the past, flip through it and see how we responded if you want review that.

Are there any other questions before we adjourn this part of the meeting?

UNIDENTIFIED SPEAKER: What is your projected start date if everything goes well?

MR. ERICH ORTH: So right now, our comment period goes through August 7th. Once that is done we would collect those, categorize them, respond to them. Right now our preliminary plan is to have a final EIS in mid

January.

MS. TISH EATON: Late December, early January.

MR. ERICH ORTH: And a record decision in the middle of February. Like Tish mentioned, that's Bonneville's record decision. The Forest Service still has their record decision to make as well.

MS. EATON: And BLM.

MR. ORTH: And BLM.

MS. MARYAM ASGHARIAN: One other note on submitting comments for the comment period, you have options here. You can submit a written comment to us tonight. You can also take some time and speak directly with our reporter if you prefer to provide verbal comments directly to him and he can capture those for you. You also have through August 7th to provide written comments through a fax, e-mail, mail, whatever works best for you.

Thank you very much for your time. We appreciate you coming out this evening and we hope that we can answer any other questions that you have.

MR. ERICH ORTH: Thank you.

(Public hearing concluded. No additional comments offered to the reporter.)

- HSTP214 0005 - Gomez

Hi,

My name is Jade Gomez. I grew up in Soda springs, and I still visit often. I heard there is a possibility of a power line going up out in hyway 34 and by the old China Hat store. Please don't allow this. It's so beautiful out there. We want to continue to enjoy the scenery - not the power lines. Please work with Monsanto and have it put up in the haul road. Thanks for your time. :)

Jade Gomez

- HSTP214 0006 - Godfrey

I've been sitting on the sidelines thinking you all would come to the conclusion to take that power line down the haul road. the most sensible way to go.
Now it looks like I need to come and say it. TAKE IT TO THE HAUL ROAD!!!!!!!!!
We live and work out there and I have all my life.
If it takes please, You got it. I'll do what ever it takes to keep you from ruining our view out there.
I hope you will make the sensible choice and move it.

-- thanks for your cooperation,

- HSTP214 0007 - Crane3

The meeting held at the Tigert Middle School in Soda Springs on May 27, 2014 was very informative. We do appreciate your time and effort in setting up this public meeting.

We were greatly surprised to hear Eric announce that the preferred route for the power line would be the one to encumber the China Hat area and our horse barn and the scenic byway. What was even more flabbergasting was to hear him say there was no special reason for this decision that it was just the way it is!

Our preference from the very beginning of Bonneville Power taking over for Lower Valley Energy was to have them follow the same general route on the haul road. This keeps the line out of sight, does not encumber the farm land and is not a safety issue for the public.

Monsanto, Jim Smith, seemed very willing to work with Bonneville Power to accomplish the haul road route. It appears that with Monsanto and Bonneville Power working together that all would benefit.

Having made our thoughts known again we will **NOT** be giving permission at this time to Bonneville Power or their associates for access to our barn area for any reason including soil samples or appraisals.

Karen and Keller Crane

- HSTP214 0008 - Dredge/Mountain States Insurance

  As a concerned rancher it is coming to my attention about the desire to run a power line down through the China Hat area. As a rancher in the area I don't feel that would be very beneficial to us there where we are not even benefiting from the power line. I feel it will cause problems in farmers' fields which we all work very hard to maintain and keep in the up most shape. We that maintain the ground there in the China Hat area want it kept very clean and pretty and a new big power line will not benefit the looks of the area. It has also come to my attention that Monsanto has agreed to let you guys run your power line along with theirs to run down to the Meadowville sub-station. I do know that going down through the China Hat area is probably cheaper to run the power line in a straight line and won't be so costly as to run it along with Monsanto's. With that said there is still easy access with Monsanto's line and it is probably a little longer route but it keeps it out of the farmers way and we don't want a big old power line or pole sticking out in the middle of a nice field planted with wheat or barley or even alfalfa. We like the look of our little area and we want it to stay that way so please listen to the concerned farmers and ranchers in the area, don't just brush our comments aside please listen.

- HSTP214 0009 - Perschon

We are property owners along the Hooper Springs Line being proposed. We are very much against putting this line down highway 34. We think it should go down the Haul Road.

We purchased our property not too many years ago. The realtor said one of the greatest values of our property and for which we paid more was for development. We have a mile of frontage on the highway, some very nice farm ground and a mile and a half of the Blackfoot River that runs through our property. It is close to the Blackfoot Reservoir and China Hat and China Cap. It is a very nice property in a beautiful area. A big high tension line down that highway would ruin our property for development.

We feel that we have been misled about the problems of putting the line along highway 34. We were told it would run along the present fence line and more or less be a small upgrade to the existing line. Now we find a100 feet easement is required and it would set at least 50 feet into the field. That would be 71/2 acres of our property and would ruin the frontage. We also worry about the health hazards of big power lines. It would destroy our investment.

Please do not ruin this beautiful little area with an ugly big power line.

- HSTP214 0010 - Smith/Tucker Torgesen Farms

I am Susan Torgesen Smith of Tucker Torgesen Farms in Caribou County, Idaho. This is a small family farm operated by my husband, sons and myself. Sometime ago, my husband and I met with Mike Richardson to express our dismay at a possible power line through our barley acreage. The poles are an extreme danger to our family as many of them are novice equipment operators.

This past week, I have been contacted by surveyors and appraisers who are requesting access to our land. **We will grant no access.**

It is our opinion that Idaho has acres of state and government property through which this line could pass. Also, Commissioner Somsen and Jim Smith from Monsanto have alternative options. It is our hope that a route can be agreed upon which will not impact private property owners, decreasing property values and threatening the safety of farm families.

- HSTP214 0011 - Godfrey

My name is Julianna and I am writing in concern of the prospective power line along Highway 34. I understand the line is a necessity and the benefits of it, but what I do not understand is the route in which it's being placed. According to Soda Springs mayor, Jim Smith, Monsanto is willing to work with you in running the power line along the Monsanto haul road. A more than viable solution.

I have family and friends who own land along Highway 34 & have spent much of my childhood in that particular area. My family and I continue to spend a lot of time near the Chine Hat and often take Sunday drives along Highway 34 simply because we love scenery and the drive. We do not want to clutter up Highway 34's beauty with the "industrial look," which is what your power line project would do.

Further more, I think it would be beneficial to Bonneville Power and yourself to have a good working relationship with the community, land owners, and Monsanto.

Again, I encourage you and the BPA team to collaborate with Monsanto in the routing of the power line and preserve the beauty along Hwy. 34. It would be much appreciated by our community, distant, and future generations.

Thanks for your time and consideration.

HSTP214 0012 - Case/Fall River Rural Electric Cooperative

Fall River is supportive of the Hooper Springs Transmission Project. Bryan Case

P.O. Box 12461
Tucson, AZ 85732

AL KACKLEY

520-886-8868

July 11, 2014

Bonneville Power Administration
Public Affairs Office – DKE-7
P O Box 14428
Portland. OR 97293-4428

RE: Hooper Springs Transmission Project

I am in favor of the South Alternative's Option 3A for the following reasons:

1) Option 3A closely follows existing transmission lines.

2) Option 3A follows a path over lands, or near lands, that have been degraded by past mining activity.

3) While Option 3A slightly encroaches into a WMA rejecting this alternative, or all of the Southern Alternatives, would result in the building of 22-23 miles of new transmission lines and creating a new transmission corridor over areas of undeveloped and virgin lands (the Northern Alternatives).

Al Kackley

June 18, 2014

Certified Return Mail

Bonneville Power Administration (BPA)
Public Affairs – DKE-7
P.O. Box 14428
Portland, Oregon 97293-4428

Subject: Hooper Springs to Lower Valley
Energy Transmission Project

To Whom:

This letter is in reference to the Subject project and BPA's preferred alternative of the South alternative Option 3A.

Given the now foreseeable and anticipated problems and transformations this project is going to have upon the Mark and Beth Carter Ranch and the Ranch's associated property, the Carter Family has become very concerned. Considering that the proposed transmission line will run through more than 2 miles of the Carter Property and close to the Ranch's homestead, we cannot avoid being troubled and perplexed. We have written letters, met and spoke with BPA's representatives, and various agents; but as time passes we are feeling our efforts and suggestions up to this point in time may have been in vain.

At the May 27th public meeting, we specifically questioned the right-of-way procedure that BPA would be using for the project. We were told that Bonneville's surveying and mapping would be butting a 100' easement against the railroad track right-of-way. This would eliminate voids or gaps between the two right-of-ways or easements. However, given the staking and test drilling that has since been done, the poles for the line are being moved further into the Carter property. Of course this creates more waste of land and disruption to the Ranch.

Another area of substantial concern to us is the extensive amount of roads that have been flagged and drawn in the area and valley above or North and East of the homestead. These roads extend far from the Transmission line right-of-way and go above and around the spring that gives water to the Carter house and provides water for cattle and wildlife. New roads in the valley of this spring are going to change the lay of the land, alter the current controls we have with cattle in this area, and create great potential for damage to the spring and environment around the spring. We do not understand why any roads or other permanent activity needs to occur in the valley of the spring when there are obviously other access routes and options to the two poles that suspend the wires across this valley. Some of the problems could be minimized if these poles and access were placed lower on the mountain and within a right-of-way next to the railroad right-of-way as discussed earlier.

We have only addressed a few of the concerns and issues that the Carter Family feel this project will bring to them as problems. The Carter Ranch has operated and practiced conservation in preserving and improving the ecological surroundings on the ranch and now Bonneville Power wants to change a way of life and a natural environment that has existed for years. It is our sincere hope that in the end Bonneville Power Administration elects not to build this proposed project.

Thanksin advance for your understanding and consideration.

Ross Wilde
Carter Family Representative

c. Beth Carter

HSTP214 0016 - Torgesen1/Farmer/Engineer

August 1, 2014 RE: Hooper Springs Transmission Project To Whom It May Concern, I am a long time resident of the Soda Springs area. I grew up on a farm on Highway 34 north of Soda. Later I married, graduated from college with a degree in Electrical Engineering and worked for a few years for Texas Instruments in Dallas, Texas. I returned to Soda Springs in 1986 and have been running a large farm in the area while also working in engineering at Monsanto Company. I place great value on the beautiful area in which we live and consider Soda Springs as great place to raise a family. My wife and I have seven sons with two of them living in the area. My farming and ranching background gives me an appreciation of nature and our natural resources that we are all blessed with in our nation. On the other hand, my engineering and industrial experience causes me to recognize the value and need for development and use of our natural resources in order to maintain and improve the quality of life of citizens. I also believe that an important responsibility of industry including utility companies is to pursue necessary development in a way that minimizes any negative impacts upon people or the environment. From my industrial experience I know that the solution that minimizes negative impacts is often not the least expensive option. As I study the alternatives that you have identified for the Hooper Springs Transmission Project, I believe that Option 3A is not the optimal choice. In my opinion, the original South Alternative or Option 1 would be a much better choice in minimizing negative impacts upon area residents, area farmers, people visiting the area, and the natural beauty of the area. Either the original South Alternative or Option 1 minimizes the distance that the power line impacts agricultural lands and the Scenic Highway 34. Option 3A places many more power poles and high voltage in fields of local farmers. These poles will be a permanent fixture causing inconvenience, risk of collision with farm implements, and an unpleasant distraction to local and visiting travelers on Highway 34. We own about one mile of frontage property on Highway 34 that our family plans to farm to many years. My sons and grandsons will operate equipment on that field along with others that we own. Having farmed for over 30 years I know the risks that obstructions in fields can cause, particularly for younger or inexperienced equipment operators. Sometimes there is limited visibility in dusty conditions or when working in the dark. This presents are very real risk of damage to expensive equipment and perhaps physical injury to an operator. I certainly don't want any more power poles than absolutely necessary placed in my fields or those of my neighbors in this county. In my opinion, any money received in compensation would not at all balance out the negative consequences of the power line. On the other hand, I believe that the original South Alternative or Option 1 minimizes negative impacts. By following those routes, the new power lines would travel near other lines that already disturb that immediate area. The lines would travel in a route already impacted by industry. In the area of concern near Monsanto's Blackfoot Bridge Mine, I know from public comments made by Monsanto leadership that Monsanto is willing to cooperate in any way they can to enable passage of the power line. I'm confident that if BPA worked with Monsanto a solution to that area of concern could be found. As a last resort, I know that power lines can be routed underground and that the cost of doing so for a relatively short distance should not have an unacceptable cost impact as a percentage of total project cost. For these reasons, I urge you to sincerely consider favoring the original South Alternative or Option 1. Doing so would have far less negative consequences that my family, others in the area and travelers through the area will have to deal with for many years to come. I also believe that routing through a more industrial area (original South Alternative) could reduce cost as opposed to negotiating with a number of farmers who like me are less than enthusiastic about having the power lines on our land. Thank you for your consideration. Sincerely, Greg Torgesen

Agrium

Agrium Conda Phosphate Operations*
3010 Conda Road
Soda Springs, ID 83276
Tel: 208-547-4381
Fax: 208-547-2550

August 7, 2014

VIA E-MAIL

Bonneville Power Administration
Public Affairs – DKE-7
PO Box 14428
Portland, OR 97293-4428

Re: Hooper Springs Transmission Project (DOE/EIS-0451)

Dear Mr. Erich Orth:

In response to Bonneville Power Administration's (BPA) current proposed alternative for the Hooper Springs Transmission Project, and pursuant to our face to face meeting with BPA in our offices in Soda Springs on June 23, 2014, Agrium has the following concerns with the preferred alignment (3A) that should be taken into consideration in the EIS:

- Issues with regards to the proximity of the proposed transmission line alignment to our leases for future mining projects and real property:
    - The proximity of the alignment to our potential "ultimate recovery" pit at our North Dry Ridge (NDR) mine may restrict our capability to recover all ore reserves present, as well as encumber our operational capability for operations such as blasting. Per the face to face meeting held on June 23, 2014, further meetings should be held with the BLM and Agrium in order to ensure that our mineral rights are fully protected with the proposed action.
    - Future mining at our Wooley Valley and Fox Hills leases may potentially be encumbered by the proposed action. If ore reserves are present beyond these leases, the ability for Agrium to recover those reserves could be limited based on the current preferred alignment.
    - The value of any potential mitigation projects on the Dry Valley property could be diminished with the current alignment. Further, we have concerns that the value of our "Access Yes" initiative on this property may be viewed as diminished by the public during their use of this property under that initiative.
    - BPA is proposing to use an existing access road inside our Dry Valley property. This area is anticipated to be used as a growth media borrow zone. We would like to ensure that our ability to utilize this location as a borrow source for growth media remains unencumbered, which may necessitate BPA re-grading or realigning the

* A Registered Name of Nu-West Industries, Inc.

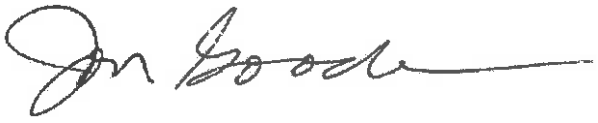
access road at various stages over the life of our nearby remediation and mining projects.

- Due to the preferred alignment's proximity to our Wooley Valley Tipple area, we have concerns with regard to our ongoing operations at that site. The proposed alternative crosses our privately owned rail line, which is operated by Union Pacific. Additionally, the line is close to our ore stockpile and tipple facilities. Per our meeting, we would like to have additional meetings and have the line staked in order to ensure that our ongoing operations are not encumbered.

Over the past six years, as you are aware, Agrium has expended a great deal of effort and expense, including the time of our staff, consultants and legal counsel, to coordinate with and respond to the multiple requests from BPA and its contractors. While Agrium and BPA have been discussing a reimbursement agreement, Agrium would like to proceed with putting a formal written agreement in place to cover the reimbursement of our time working on the BPA project. We look forward to resolving this issue with you and continuing our work on the project.

In general, Agrium is supportive of the Hooper Springs Transmission Line project provided the aforementioned concerns can be satisfactorily resolved.

Sincerely,



Jon Goode
Vice President
Nu-West Industries, Inc.

HSTP214 0019 - Drewien

The following are my comments on the supplemental draft EIS for Hooper Springs Transmission project. You provide volumes of data regarding the potential impacts upon the North and South alternative routes. With a goal of reducing negative impacts of the alternatives, I suggest selecting the South Alternative, Option #1. Simply put, Option #1 traversing a proposed route from Hooper Springs substation eastward to near Conda, northward near or following the Monsanto Haul Road along the west side of Woodall Mountain to the junction of the Blackfoot River (mile #11) and eastward could significantly reduce impacts upon owners of agricultural lands compared to options 3 and 3A, greatly minimize impacts on migratory birds (especially cranes and waterfowl) that traditionally use the area east and south of Blackfoot Reservoir, and avoid impacts upon scenic and recreational values along state highway 34, with the powerline situated on the eastside hills. Your review of these subjects appears to be incomplete and superficial. Why would you suggest Options 3 and 3A knowing your proposed powerline would negatively impact and materially inconvenience agricultural landowners, negatively impact migratory birds protected by the Migratory Bird Treaty Act of 1918, and disregard values associated with scenic byway Highway 34. For example, the US Fish and Wildlife Service, Office of Migratory Bird Management, Denver, flies these areas annually in September to survey cranes, and pinpoints crane locations by GPS. How could you possibly completely ignore these key data in your voluminous analysis? In addition to completely ignoring the large volume of crane data that the US Government has collected at considerable expense, your project relies on 20th century technology while attempting to meet 21st century needs. You state (2.5.7) that underground high-voltage transmission cables typically are used only for relatively short distances. A check of the internet reveals greatly expanded use of underground technology in recent and proposed projects by other power companies. Many of the complaints that I hear regarding your proposed project would be greatly reduced or eliminated if you would employ updated methodologies. Ultimately the users who would benefit from this line should bear the financial cost of such improvements, not BPA. I believe it is time for BPA to modernize the approach for this proposal and reduce conflicts with the citizens of Caribou County, wildlife, and other uses. Roderick C. Drewien Hornocker Wildlife Institute, U of Idaho (retired)

HSTP_0020

J.R. SIMPLOT COMPANY ONE CAPITAL CENTER 999 MAIN STREET · SUITE 1300
P.O. BOX 27 BOISE, IDAHO 83707 (208) 336-2110 FAX (208) 389-7515

CORPORATE HEADQUARTERS

August 7, 2014

SENT VIA EMAIL TO: www.bpa.gov/comment
PAPER COPY SENT VIA CERTIFIED MAIL # 7011 0470 0002 4792 9737
RETURN RECEIPT REQUESTED

Bonneville Power Administration
Public Affairs - DKE-7
P.O. Box 14428
Portland, OR 97293-4428

Dear Sir/Ma'am:

The Bonneville Power Administration ("BPA") is proposing to build a new 115-kilovolt (kV) transmission line that would extend from BPA's proposed Hooper Springs Substation near the City of Soda Springs, Idaho, to a proposed BPA connection facility that would connect with the existing transmission system of Lower Valley Energy, a Cooperative Utility Corporation ("Lower Valley") located in northeastern Caribou County. The new 115-kilivolt transmission line would extend for a distance of approximately 22 to 32 miles depending on the routing alternative. BPA also would construct an approximate 0.5-mile-long 138 kV transmission line between the proposed Hooper Springs Substation and PacifiCorp's existing Three Mile Knoll Substation to connect the electrical facilities to the regional transmission grid. The project is needed to improve voltage stability on the transmission grid to meet future load growth in southeast Idaho and northwestern Wyoming.

BPA has released a Supplemental Draft Environmental Impact Statement ("SDEIS") on the Hooper Springs Project and is soliciting comments. BPA is considering a North Alternative, including two route options (the Long Valley Road and North Highland Road options) and a South Alternative, including five route options (Options 1, 2, 3, 3A, and 4) for the proposed transmission line. BPA is also considering the NoAction Alternative.

The J.R. Simplot Company (Simplot) has phosphate operations in Caribou County that are directly affected by electrical supply reliability and the location of electrical transmission facilities. These operations include an existing phosphate mining operation near the Idaho-Wyoming border, an existing and related pumping operation at Conda, Idaho, a large ranch along the Idaho-Wyoming border and a proposed mine in the Slug Creek drainage to be located northeast of Soda Springs. Simplot has the following comments on this proposed project.

Simplot became aware in 2008 that a new electrical transmission line was under consideration for a route north and east of Soda Springs, Idaho. As a business owner accustomed to electrical service outages for our operations and with employees who are

accustomed to electrical service outages for our operations and with employees who are members of the communities in Caribou County, we welcome the opportunity for improving electrical service and capacity for the southeastern corner of Idaho.

Simplot supports BPA's preferred Southern Alternative, Option 3A, and overall favors the southern routes. Simplot encourages BPA to refer to our previous comments (attached) related to the environmental benefits as well as managing the potential risk of contaminants from historical mining operations along any of these southern routes. For purposes of brevity, those comments will not be repeated, but remain relevant to your overall analysis. We believe any of these routes would be preferable to the No Action Alternative. Simplot does not support the No Action Alternative.

All the routes being considered by BPA cross private property. We believe that it is very important for BPA to work carefully with private landowners to address concerns regardless of the ultimate route chosen.

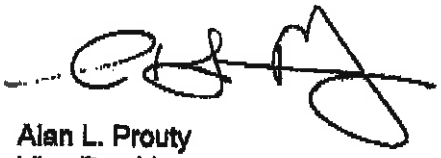
Simplot was involved in providing access for an earlier version of this project. During the summer of 2008, Simplot was approached by Lower Valley Energy, requesting an easement across Simplot land for the purpose of constructing the new electrical transmission line in connection with the Hooper Springs Transmission Project. This request ultimately resulted in Simplot granting to Lower Valley a 100 foot wide easement across Simplot land for the purpose of constructing, operating, maintaining, rebuilding and replacing a 115-kVdouble circuit power line to serve this region. This easement was recorded in the official real property records of Caribou County, Idaho on October 15, 2008 as instrument no. 181787.

Soon after the recording of this easement, Lower Valley approached Simplot again requesting permission to use a parcel of Simplot land near Conda, Idaho to stage equipment and to park vehicles that would be used to build the transmission line. In response to this request, Simplot and Lower Valley executed a Lease Agreement for Parking Equipment and Material Staging on May 4, 2009. Simplot remains open to working with BPA and Lower Valley on providing access onto Simplot-owned land to assist with the successful completion of this project.

Simplot remains a strong advocate for the construction of the Hooper Valley Transmission Project, regardless of the ultimate route chosen. Although we believe it is most appropriate that a project intended to serve the public is better placed on public land where possible, Simplot is committed to provide the rights to use Simplot land if necessary to build the infrastructure that will improve the economic sustainability of this region.

Please contact Don Sturtevant at 208.389.7306 if you have any questions regarding these comments.

Sincerely,



Alan L. Prouty
Vice President
Sustainability & Regulatory Affairs

Attachment

c: Erich Orth, BPA (etorth@bpa.gov)
Tish Eaton, BPA (tkeaton@bpa.gov)
Don Sturtevant, J.R. Simplot Co.
Vic Conrad, J.R. Simplot Co.
Lori Hamann, J.R. Simplot Co.
Scott Lusty, J.R.Simplot Co.

ID/Dairy Syncline/General/Energy/2013

J.R. SIMPLOT COMPANY ONE CAPITAL CENTER 999 MAIN STREET SUITE 1300
P.O. BOX 27 BOISE, IDAHO 83707 (208) 336-2110 FAX (208) 389-7515

CORPORATE HEADQUARTERS

April 19, 2013

SENT VIA EMAIL TO: www.bpa.gov/comment
ORIGINAL SENT VIA CERTIFIED MAIL #7009 0080 0001 0391 6761
RETURN RECEPIT REQUESTED

Bonneville Power Administration
Public Affairs Office - DKE-7
P.O. Box 14428
Portland, OR, 97293-4428

Dear Sir/Ma'am:

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BPA has released a Draft Environmental Impact Statement ("DEIS") on the Hooper Springs Project and is soliciting comments on two routing alternatives that are being considered for the proposed line from the Hooper Springs Substation to the connection with LVE's transmission system: a North Alternative, including two route options and a South Alternative, including four route options. BPA is also considering a No Action Alternative, that is, BPA would not build the transmission line.

The J.R. Simplot Company (Simplot) has phosphate operations in Caribou County that are directly affected by electrical supply reliability and the location of electrical transmission facilities. These operations include an existing phosphate mining operation near the Idaho-Wyoming border, an existing and related pumping operation at Conda, Idaho, a large ranch along the Idaho-Wyoming border and a proposed mine in the Slug Creek drainage to be located northeast of Soda Springs. Simplot has the following comments on this proposed project.

Simplot's Relationship to the

Introduction

Simplot became aware in 2008 that a new electrical transmission line was under consideration for a route north and east of Soda Springs, Idaho. As a business owner accustomed to electrical service outages for our operations and with employees who are members of the communities in Caribou County, we welcomed the opportunity for improving electrical service and capacity for the southeastern corner of Idaho. [Eventually, this project became known as the "Hooper Springs Transmission Project".] Simplot, as described below, favors the South Alternative. However, we believe that either route would be preferable to the "No Action" Alternative. Simplot does not support the No Action Alternative.

Property Access and Considerations

Both routes (North and South) being considered by BPA cross private property. We believe that it is very important for BPA to work carefully with private landowners to address concerns regardless of the ultimate route chosen.

Simplot was involved in providing access for an earlier version of this project. During the summer of 2008, Simplot was approached by Lower Valley Energy, requesting an easement across Simplot land for the purpose of constructing the new electrical transmission line in connection with the Hooper Springs Transmission Project. This request ultimately resulted in Simplot granting to Lower Valley a 100 foot wide easement across Simplot land for the purpose of constructing, operating, maintaining, rebuilding and replacing a 115-kVdouble circuit power line to serve this region. This easement was recorded in the official real property records of Caribou County, Idaho on October 15, 2008 as instrument no. 181787.

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Simplot remains open to working with BPA and Lower Valley on providing access onto Simplot-owned land to assist with the successful completion of this project.

South Route Alternative – Environmental Benefits

The South Alternative does provide an environmental benefit in connection with Simplot's proposed Dairy Syncline Phosphate Mine project. The Dairy Syncline project will require the construction of an electrical power transmission line to serve the new mine. If BPA chooses the South Route Alternative, and the transmission line is built timely, the route will result in disturbing three miles less than the alternative. The alternative is a connection to the Lower Valley transmission lines located at Diamond Creek (see Attachment A).

Southern Route Alternative – Addressing Mining Related Issues

In the DEIS, BPA identified two issues related to mining especially for the South Alternative. Specifically:

1. Accommodating new mining operations that may be built along or adjacent to the South Alternative route.
2. Managing the risk associated with the potential release of contaminants from historical phosphate mines that are located along the South Alternative route.

Issue number one can be resolved by coordinating closely with the phosphate mining operations that are planned for Caribou County regardless of the ultimate route chosen. As for issue number two, construction of transmission lines and associated infrastructure (road) can likely be done in such a manner so as to minimize the potential release of any hazardous substances. The DEIS states that "if contaminants are disturbed, impacts on workers, the general public, and environmental features could be **moderate to high.**"[1] The DEIS provides no explanation of how the potential release of contaminants would rate "moderate to high" for impacts to humans and ecological receptors. There has been considerable study of potential risks to both human health and ecological receptors by both the phosphate companies and state and federal agencies. These studies concluded:[2]

> ...that regional human health and population-level ecological risks were unlikely due to the limited amount of area impacted by previous releases, however, selenium releases in specific locations needed to be addressed.

Simplot recently performed a hazard analysis for workers performing construction in a portion of the Conda Mine site.[3] The construction includes extensive excavation and grading of residual mine materials. This hazard analysis found potential risks to workers due to contamination was low. No personal protective measures are required. The levels of contamination in the Old Tailings pond area are lower than in the construction area. In addition, access to the Conda Mine site for the general public is limited. Therefore the potential for impact to workers and the general public are low.

These studies that have been conducted should be reviewed by BPA to more accurately estimate any potential risks that might arise from historical mining operations.

Also, a correction is needed on page 3-199. A statement is made that the new tailings pond at the Conda Mine is a source of contaminants; that statement is incorrect.

---

[1] BPA. 2013. Hooper Springs Project DEIS. P.3-124.
[2] Tetra Tech EM Inc. 2002. Final Area Wide Human Health and Ecological Risk Assessment, Selenium Project, Southeast Idaho Phosphate Mining Resource Area.
[3] Formation Environmental. 2013. Pedro Creek Overburden Disposal Area Early Action Design and Implementation Plan, Appendix G, Health and Safety Plan.

Finally, EPA had an effort underway to foster development of renewable energy sources on CERCLA sites.[4] EPA launched RE-Powering America's Land: Siting Renewable Energy on Potentially Contaminated Land and Mine Sites to encourage the siting of renewable energy facilities on thousands of currently and formerly contaminated properties across the nation. This management plan builds on the progress that's been made to date under this initiative, and lays out key areas that EPA will focus on. Though this transmission line is not strictly a "renewable" energy project, it will carry electricity generated from wind turbines and the principles in EPA's initiative do apply to this situation.

Summary

Simplot remains a strong advocate for the construction of the Hooper Valley Transmission Project, regardless of the ultimate route chosen. Although we believe it is most appropriate that a project intended to serve the public is better placed on public land where possible, Simplot is committed to provide the rights to use Simplot land if necessary to build the infrastructure that will improve the economic sustainability of this region.

Please contact Don Stutevant at 208.389.7306 if you have any questions regarding these comments.

Sincerely,

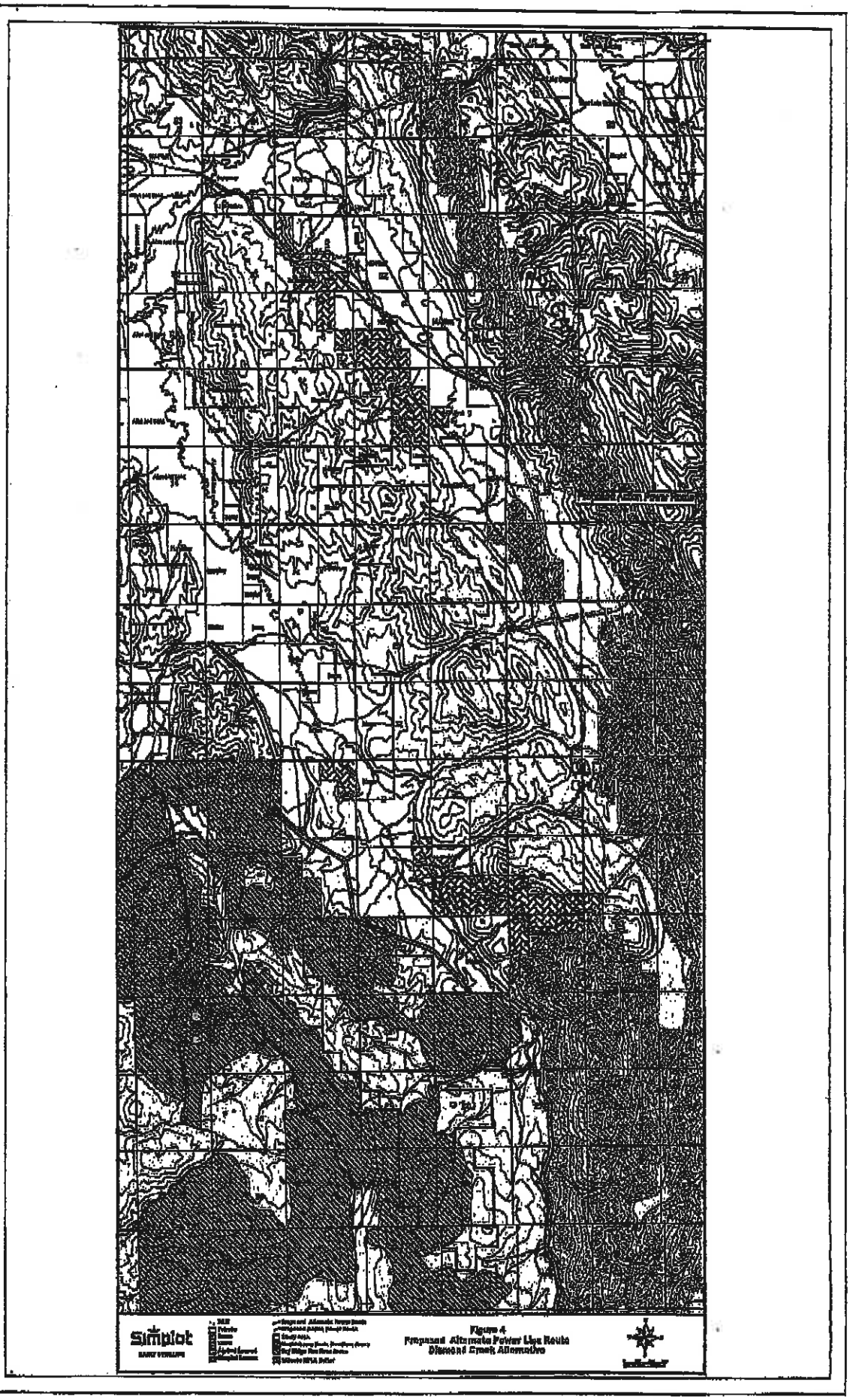
Alan L. Prouty
Vice President, Environmental & Regulatory Affairs

Attachment

C:

Erich Orth, BPA (etorth@bpa.gov)
Vic Conrad, J.R. Simplot Co.
Lori Hamann, J.R. Simplot Co.
Scott Lusty, J.R.Simplot Co.

[4] EPA. 2010. Re-Powering America's Land Initiative Management Plan.


Simplot
Figure 4
Proposed Alternate Power Line Route
Diamond Creek Alternative

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

444 Hospital Way #300 • Pocatello, ID 83201 • (208) 236-6160

C. L. "Butch" Otter, Governor
Curt Fransen, Director

To Whom It Concerns:

The Water Quality Section of Idaho Department of Environmental Quality's Southeast Regional Office (DEQ) has several general comments concerning the proposed Hooper Springs Transmission Project. Staff at this office will likely have a role in Water Quality Certification of this project, depending on its scope and potential impacts to water quality/aquatic resources.

We encourage you to engage in discussions with DEQ in the early stages of this project so that potential impacts to water quality/aquatic resources can be taken into account and avoided if possible. Our main concerns are focused on temporary and permanent water quality impacts resulting from roads, staging areas, crossings and vegetation maintenance associated with the project. DEQ also will look to long term management to avoid and reduce impacts to water bodies affected by this action. Sediment input to streams and other water bodies is our primary concern. Facilities associated with the project will need to be designed and constructed to avoid and minimize sediment impacts to surface waters during construction and throughout the life of the project. Additionally, where transmission lines cross live streams, vegetation adequate for shading these waters needs to be preserved to prevent thermal impacts.

We at DEQ look forward to working with the Bonneville Power Administration in ensuring appropriate protection of water quality during the course of this project.

Sincerely,

Greg Mladenka
Water Quality Scientist
Southeast Regional Office

Caribou County Commissioners

P.O. Box 775
Soda Springs, Idaho 83276
(208) 547-4324

MARK MATHEWS
Commissioner District #3

EARL SOMSEN, Chairman
Commissioner District #2

PHIL CHRISTENSEN
Commissioner District #1

August 7, 2014

Bonneville Power Administration
Public affairs-DKE-7
P O Box 14428
Portland, OR 97293-4428

RE: Hooper Springs Transmission Project

If Bonneville Power Administration (BPA)'s proposed "Hooper Springs Power Line Project" continues to be a viable project, Caribou County as your co-ordinating partner agrees with the "south alternative" route along the Blackfoot River and skirting the reclaimed mines as the preferred alternative.

The "North alternative" would be unacceptable to Caribou County. This is because of the many and much discussed issues already presented by testimonies and other means concerning environmental, aesthetical, property damage and various other issues. The largest remaining concern to Caribou County is the route from Hooper Springs Substation to mile marker 11. The proposal to use "option 3" and go straight north through several miles of prime, productive farmland is unacceptable to Caribou County for the following but not limited to reasons: 1) Disruption, impediment, inconvenience, loss of value, and liability issues for the farmers. 2) Tens of thousands of migratory waterfowl use this area intensively for late summer/fall and spring feeding and would be at risk of striking power lines. 3) Having been tilled, these fields are extremely soft and muddy after rain, particularly in late fall and all spring, making access to the proposed lines nearly impossible with any type of equipment.

However, "Option 1" from Hooper Springs Substation going east to Conda and then north to "mile post 11" along the "Monsanto haul road right of way" could be acceptable, for several reasons. In conversing with Monsanto officials, we believe they could be a co-operative asset for BPA. This would satisfy Caribou County since it would place the proposed power line in an already industrialized location. The hard surfaced haul road in close proximity to the proposed power line would seem to be a great convenience to BPA in times of service or maintenance during wet weather or soft soil seasons. This route is likely to meet with but a small amount of resistance and concern opposed to that which is

involved with "option 3" that goes north from the Hooper Springs Substation, since "option 1" goes through and disturbs a much smaller amount of private property.

There is a BPA termed "pinch point" along the Monsanto haul road at the "fish pond" area where it may be necessary to run the power line underground for a very short distance as there is an existing power line already in the area that BPA's line would cross. Monsanto has no further plans to disrupt the soil where the underground line would be.

It seems likely that Lower Valley Energy will not have much excess electricity to send to our energy users during our peak demand times that sometimes directly affects our local industries' production. With this in mind, it seems obvious that Caribou county has very little to gain in being host to this proposed power line. An issue that could be of benefit to the industries of Caribou County is to rectify any errors with them that is not limited to but would include the complete reversal of "the Magnussen Clause" and its implications.

Caribou County is committed to our role as a co-ordinating partner with BPA in the Hooper springs Transmission Project and developing the least obstructive, least disruptive, yet viable and beneficial power line route that will serve the needs of energy users. If Caribou County were to create a designated power line corridor, which Idaho State law provides the authority to do, this is the corridor we would authorize; from Hooper Springs Substation on "option 1" east to Conda then north on the "Monsanto haul road right of way" to mile marker 11, then east on the south preferred alternative to the connection facility at the Lanes Creek Road.

Thank you for your consideration.

The Caribou County Board of Commissioners,

Earl Somsen

Earl Somsen, Chairman

Phil Christensen

Phil Christensen

Mark Mathews

Mark Mathews

Greater Yellowstone Coalition

America's Voice for a Greater Yellowstone | LANDS • WATERS • WILDLIFE

August 7, 2014

Tish Eaton
Environmental Lead Bonneville Power Administration - KEC-4
P.O. Box 3621 Portland, OR 97208-36211
tkeaton@bpa.gov

Re: Hooper Springs Transmission Project Supplemental Draft Environmental Impact Statement May 2014

Dear Ms. Eaton:

GYC is a 501(c)(3) non-profit organization dedicated to protecting the lands, waters, and wildlife of the Greater Yellowstone Ecosystem ("GYE"). GYC has offices in Idaho, Wyoming, and Montana with approximately 27,000 members and supporters nationwide. GYC's members regularly use and enjoy the lands and waters of southeast Idaho, including the Blackfoot River Wildlife Management Area, for a variety of activities that includes fishing, hiking, hunting, wildlife viewing and photography.

GYC continues our objection to any alternative that will impact the Blackfoot River WMA. Selection of an alignment, specifically Option 3a, for the Hooper Springs Transmission Project which crosses into the WMA will create a project in which GYC's and its member's interests would be substantially harmed. In this case there are alternatives that will not impact the WMA.

GYC and its members have a long history in protecting the WMA. GYC "adopted" the WMA through the Idaho Department of Fish and Game's "Adopt-a-Wetland" program in 1997 and our staff and members have volunteered more than one thousand hours of labor on the WMA. We have carried out numerous restoration and enhancement projects that have improved fish and wildlife habitat within the WMA. It is our opinion that any construction and permanent infrastructure in the WMA will have profound and negative consequences for habitat and wildlife, which in turn will negatively affect GYC's members and supporters, as well as the larger public who value the WMA for a variety of recreational activities.

The WMA continues to provide important protected habitat for a variety of wildlife, including moose, elk, and deer. Streams within the WMA provide crucial habitat for native fish, including the imperiled Yellowstone cutthroat trout. Furthermore, the sagebrush lands of the WMA provide habitat

for sage grouse, a species with the Fish and Wildlife Service has determined warrants listing under the Endangered Species Act, largely due to fragmentation of the species' habitat. Moreover, the WMA provides an important recreational site for residents of and visitors to Idaho. People visit the WMA each year to participate in a variety of activities, including fishing, hiking, hunting, wildlife viewing, and photography. Protecting the Blackfoot WMA is critical given the extensive fragmentation of habitat due to mining operations in the area.

The lands surrounding the other alternatives also exhibit similar traits and all alternatives should be evaluated to incur the least possible impact to the surrounding habitats.

Additionally GYC would encourage a transmission alignment that creates the least amount of new auxiliary, construction and supporting infrastructure. The use of existing road and transmission corridors will minimize the potential adverse impacts on waters resources, terrestrial and avian species along with the disruptions to the ranching operations along the final route. Disruptions to ranch operation include crossing productive fields and interfering with optimal planting, irrigation and harvest practices.

Please send us any further documents for this project as we would like to continue our opportunity to provide comments. We look forward to working with BPA on this and future projects. Thank you for your consideration.

Sincerely,

Kathryn M. Rinaldi

Kathy Rinaldi
Idaho Conservation Coordinator
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208-354-1593
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Bob Zimmer
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HSTP214 0024 - Torgesen3

To whom it may concern, I have received and reviewed the proposals for the Hooper Springs Transmission project. I would like to suggest that you consider and choose the South option or Option 1 that goes along the Monsanto haul road. Monsanto has graciously said that they would work with BPA. Also the east side of the haul road against the mountain is very solid ground with little or no marsh land. Where there may be marsh land, going with an underground wire might need to be considered. The major plus in taking option 1 is: 1. It is a safer option where you won't have a lot of farmers with high voltage wires in their fields to contend with. 2. It won't disturb a scenic hwy and will leave a beautiful view of our area. 3. May be more cost effective since you won't have to make deals with several farmers who really don't want the line on their property. Thank you for your time and consideration!!! Irene

HSTP214 0025 - Cole1

To whom it may concern. My family and I have farm ground that would be affected with the northern route. My family, as well as the other farmers affected with this route rely on that farm ground to make a living. Putting power poles takes away ground and puts one more thing we have to worry about going around. It also affects our gps signal every time we have to go under the wires. I am asking that you please consider the Monsanto haul road route.

HSTP214 0026 - Torgesen4

My name and Ben Torgesen I grew up here then moved away for a while obtaining a college degree in civil engineering. Then after being laid off moved back to help my father out on the farm. The issue with the power lines running close to or through land owners property is a concern. These lines running through farmers personal property and defacing their property and possibly putting them in danger is a concern. I believe it would be in the best interest of the utility company to find another way to run the power lines on state land rather than personal property thank you for considering my comments

HSTP214 0027 - Cole2

Please listen to the farmers who's land will be greatly affected by the proposed BPA Transmissions Line, the Towers,and the Right-of-ways starting at the Threemile Knoll Substation. Why do you think Farmers oppose power lines going through their property? As I have verbally said before If Monsanto has voiced that a better route would be to run the power poles along their haul road why wouldnt the BPA be in agreement. Rethink your route and take Jim Smith serious!!. Don't take valuable ground away from a Farmer and a Rancher who's livehihood depends on their ground. Have you ever watched a Farmer or Rancher work on their land. They spend many long hard hours working with high dollar equipmnet. Their time frame is short and they need to be productive to get their crops planted and harvested in the Spring, Summer and Fall. Farming around power lines isnt a Soultion, It's an Inconvenience. I DO NOT want power poles & your Right-of-Aways on my property. Please choose the haul road.

HSTP214 0028 - Torgesen5/Student/Mentor/Farmer

Good Evening BPA/Whomever Else This May Concern: My name is Jeremiah Torgesen. I grew up in a farming family whose land is primarily located north of the city of Soda Springs. Upon reviewing the comments submitted on your website, I find that the majority of them are in favor of Option #1 rather than Option #3 which is the option currently being proposed by your organization. I only found one comment supporting your current option, and he/she had only one line of supporting information - it would affect his/her farmland. Having grown up in the Soda Springs area in a farming family, I am very familiar with the farmers who own a lot of land in the area and this farmer is not one of them; therefore, if he/she is affected it would be in a much smaller proportion than the dozen other farmers who would be affected by Option #3 (Browns, Torgesens, Murdocks, Cranes, etc.). Operating equipment is already tough enough with obstructions in the way, and every obstruction in the field causes a good amount of farmland around it to remain unused, because too tight of a turn could cause a collision. Being an operator of equipment myself, I would greatly appreciate it if the obstructions could be placed somewhere outside of the fields I will be working in. In addition, Option #3 goes along a major highway! The major highway used by tourists in and out of Soda Springs to go to Jackson Hole etc. It would significantly decrease the beauty of the drive for tourists traveling through Soda Springs, which may impact the route used by tourists to get to their location of choice, and I can tell you from the conversations I have had with local store owners that a decrease in tourists through the area would greatly impact their sales (and the businesses in Soda Springs are already struggling enough). Also, Option #3 would impact the bird population because it is on a bird migration route. I learned in school that Grays Lake is an important nesting grounds for sandhill cranes and a good possible location for a nesting grounds for whooping cranes as well. Whooping crane populations are low and it would be good to keep any obstructions to this population as far out of their way as possible. Finally, Option #3 does not look like it will even be possible. Have you viewed the comments by the other farmers in the area? Many have stated that they will not allow BPA to run lines through their farmland. In conclusion, it is up to you what choice you will make. However, from the research that is presented in the majority of the comments listed on your website, it appears that Option #1 (the southern route) will be a much safer, cheaper, and, perhaps, the only possible solution. Sincerely, Jeremiah Torgesen

HSTP214 0029 - Cole3/Cole Farms

BPA, Please agree with our County Commissioners and support all comments that the "South Route" is the most feasible Route to place power lines. Respect the Farmers and Rancher's land, the Migratory Waterfowl Flyways and the Beautiful Country Scenery that God gave to us to enjoy for many generations to come. Please stop the discontent of all those involved with the North Route and let us have the peace of mind knowing our land won't be affected with power poles!!! Sincerely Tami Cole

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Idaho Conservation League
PO Box 844, Boise, ID 83701
208.345.6933

Bonneville Power Administration
Public Affairs Office-DKE-7
PO Box 14428
Portland, OR
97293-4428

August 7, 2014

RE: Hooper Springs Transmission Project SDEIS

Dear BPA,

Thank you for considering our comments on the Hooper Springs Transmission Line Project SDEIS. Since 1973 the Idaho Conservation League has had long history of involvement with both habitat protection and statewide energy issues. As Idaho's largest statewide conservation organization, we represent over 25,000 supporters who want to ensure that energy development and related infrastructure are consistent with natural resource protection.

We appreciate the development of a Supplemental Draft Environmental Impact Statement to further analyze alternatives and describe impacts of this project. We believe that BPA's top priority should be to avoid environmental impacts as possible, and then to minimize and mitigate these impacts if they cannot be avoided. We believe that the best way to avoid impacts is to further develop Non-Wires Alternative which combines energy efficiency, demand response, distributed generation and changes in energy consumption patterns. BPA had contracted with Energy and Environmental Economics (E3) to conduct the None-Wires feasibility analysis. BPA subsequently dismissed this alternative. We believe that BPA's dismissal of this alternative (SDEIS p. 2-38) was premature and based on dated assumptions that were not applied to other alternatives. E3's analysis (E3 2012) showed that through increasing efficiencies in the existing system and upgrading the existing infrastructure, it could be possible to defer transmission line construction until 2025 or longer. This prudent delay would allow BPA to better respond to issues such as potential listing of Greater Sage-grouse. In additional, this additional time would allow BPA to more thoroughly assess and mitigate environmental impacts of a new transmission line on wildlife resources and private property. Furthermore, with improvements regarding energy efficiencies and other non-wire measures, the 2025 timeframe may even be longer.

Throughout this project, private property owners, community members, and wildlife advocates have all questioned the urgency of this project and expressed significant concerns regarding the potential routes. From our review of the SDEIS, there is no clear environmentally preferable alternative except for the Non-Wires Alternative. We believe that before a route is selected, the analysis needs to provide additional details on specific impacts to waterfowl, wildlife, the Blackfoot Wildlife Management Area, Greater sage-grouse, trumpeter swans, sand hill cranes and other wildlife.

In addition, the suite of mitigation measures described is best described as remediation actions or best management practices, but do not actually restore, keep whole, or otherwise compensate for the environmental impacts. In addition, the analysis should provide an estimate of the costs to mitigate for the various impacts of each route in order to accurately compare the relative costs of different routes. We point out that the State of Idaho is in the process of developing a Mitigation Framework for Sage-grouse which is directly relevant to this situation and could be potentially helpful in offsetting impacts. Regarding impacts to the integrity of Blackfoot Wildlife Management Area, we recommend working with the State of Idaho and the Idaho Department of Fish and Game on a comprehensive mitigation strategy should Option 3A be ultimately selected.

Before a route is selected, there are several examples of conservation and restoration work in the area that BPA may be interested in reviewing in order to develop a mitigation program for the project. These examples include the work of the Sagebrush Steppe Regional Land Trust, local conservation organizations, and the Upper Blackfoot Confluence. The Upper Blackfoot Confluence is a partnership of conservation groups and private companies dedicated to restoration activities in the Blackfoot River watershed. We recommend that any mitigation strategy be integrated on a watershed scale so that benefits of any individual projects are coordinated with other restoration activities for maximum benefit.

We appreciate BPAs careful consideration of our comments and invite BPA to have further discussions with ICL on potential pathways to proceed. Please incorporate all our previous comments and send us all subsequent documents for this project.

Sincerely,

John Robison
Public Lands Director
(208) 345-6942 x 13
jrobison@idahoconservation.org

Idaho Conservation League comments on the Hooper Springs Transmission Line Project SDEIS

Non-Wires Alternative

We appreciate the expanded discussion in the SDEIS regarding the Non-Wires Alternative[1] but find that BPA dismissed this alternative prematurely. Instead of expediting construction of a new transmission line, the Non-Wires Alternative would have combined improvements energy efficiency, demand response, distributed generation, and changes in energy consumption patterns to accomplish the same short-term goals of improved reliability. BPA contracted with Energy and Environmental Economics (E3) to conduct Phase I of the non-wires analysis which was completed in January 2011. The Phase 1 report found that the transmission line could be deferred for five to nine years until 2016 or 2020. Following this report, BPA opted to continue to develop the Hooper Springs line while analyzing the efficacy of non-wire measures. A more thorough Phase 2 study was completed in March of 2012.

E3 was given several key assumptions or parameters to base their analysis upon, including whether permitting and constructing a natural gas generator could be feasible by the winter of 2013-2014:

- The proposed project is a nominal 25 to 41 MW peaking resource needing to be in service by fourth quarter 2013.
- The Plant will be limited to operating up to 1000 hours per year to cover winter peak emergency use.
- Natural gas is the preferred fuel.

Key economic assumptions include:

1. Construction costs are stated in 2011 dollars
2. Permitting is completed and major equipment Purchase Contracts are signed and fabrication authorized on or before September 14, 2012.
3. Kick-off for local and State air permits will occur by November 1, 2011.[2]

The SDEIS provides a useful overview of this study:

> The Phase 2 study concluded that timely implementation of a combination of energy efficiency, demand response, and distributed generation, along with the installation of a new capacitor bank, could make it technically feasible to defer the Hooper Springs Project **beyond 2025.**[3] (emphasis added).

As mentioned previously, this prudent delay would allow BPA to better respond to issues such as potential listing of Greater Sage-grouse, to more thoroughly assess environmental impacts of a new transmission line, to develop a mitigation approach for different issues, and to use the estimated mitigation costs as part of the route determination process. All these steps would result in a better sited,

[1] Hooper Springs SDEIS p. 2-38.
[2] Hooper Springs Phase 2 Non-Wires Alternatives Analysis: Final Report, Executive Summary, p. 1 http://www.bpa.gov/Projects/Initiatives/NonWires/Hooper_Springs_NWA_Implementation_Study_AppxAB.pdf
[3] BPA Hooper Springs SDEIS p. 2-39

better planned project with fewer issues. Furthermore, with improvements regarding energy efficiencies and other non-wire measures, the 2025 timeframe may even be longer.

However, BPA had given E3 a sideboard that the peaking resource component of the Non-Wires Alternative would have to be up and running by the winter of 2013-2014. As such, BPA made the following conclusion in the May 2014 SDEIS (which was released after this deadline had passed):

> However, the study ultimately concluded that the non-wires solution was not feasible from a practical perspective because it would not meet the need to reliably serve LVE during peak loads within the timeframe required.[4]

In essence, BPA prematurely dismissed a completely feasible and potentially more cost-efficient alternative due to a lapsed, no longer relevant deadline.

We point out that the none of the other 9 action alternatives (North Alternative, Long Valley Road Option, North Highland Option, South Alternative, Option 1 (South), Option 2 (South), Option 3 (South), Option 3A (South), Option 4 (South)), had similar timeframes or deadlines imposed. We believe that BPA's dismissal of this alternative (SDEIS p. 2-38) was premature and based on dated assumptions that were not applied to other alternatives.

Under the arbitrary deadline imposed by BPA on E3's analysis, in order for the Non-Wires Analysis to be considered, it would have to have been constructed eight months before the comments closed on the SDEIS (August 7, 2014). We point out that, on the current schedule, the earliest possible date for any construction on BLM or Forest Service lands would be 2015, not counting administrative appeals or legal action. Even once a route is selected, BPA would still need to negotiate ROW arrangements with individual private property owners, which would take additional time. We note that the cost estimate has increased from $55 million to $70 million, which should give some pause for thought for the non-wire alternative.

All timelines for complex projects such as this tend to become drawn out. Normally, the proponents and permitting agencies adjust all the various timelines accordingly. However, in this case, it appears as though BPA held one alternative to a different – and increasingly impossible – timeline while the timelines for the other, arguably more controversial, disruptive, impactful and harmful alternatives were effortlessly extended. The non-negotiable winter 2013-2014 deadline passed without any of the other alternatives being selected, constructed or brought online. It appears as though that the original deadline was unrealistic or overly ambitious and was not revised as it should have been.

That is not to say that there isn't some degree of urgency here or that the Non-Wires Alternative should be the automatic conclusion of this analysis. But BPA has a responsibility under NEPA to develop a range of reasonable alternatives. Agencies must "study, develop, and describe appropriate alternatives" to the proposed course of action when preparing an EA or an EIS. *W. Watersheds Project v. Abbey*, 719 F.3d 1035, 1050 (9th Cir. 2013). The "consideration of alternatives is critical to the goals of NEPA" and furthers those goals "by guaranteeing that agency decisionmakers have before them and take into proper account all possible approaches to a particular project." *Bob Marshall Alliance v. Hodel*, 852 F.2d 1223, 1228–29 (9th Cir. 1988).

[4] Hooper Springs SDEIS p 2-39 and 2-40.

It is critical to analyze a range of alternatives, especially when the majority of alternatives require substantial linear infrastructure, and permanent, irreversible impacts. The Non-Wires Alternative is particularly important for the BPA to consider because of the significantly reduced cost to implement, the avoidance of environmental impacts, and the potential to site any new infrastructure within the footprint of existing industrial facilities.

We recognize the reliability issues that are enforced by WECC, which has specifically stated that local shedding cannot be the only solution and that a permanent long-term solution is needed to address reliability concerns. However, a permanent, long-term solution does not mean that it has to be selected as soon as possible, only that a well-thought out plan should be in place in a timely manner.

By effectively disqualifying the Non-Wires Alternative from further consideration with a now-arbitrary time frame, we believe that BPA is in danger of proceeding in an arbitrary and capricious manner. We believe that now is the best time for BPA to review its analysis and address these oversights in a Supplemental SDEIS.

We note that Guideline 5 for the Caribou National Forest specifically states that before new corridors are approved, consideration should be given to uprating, multiple circuiting, among other measures.[5]

It appears as though some of the alternatives examined in the 1998 Lower Valley Power and Light Transmission System Reinforcement Project EIS[6] could apply to this situation. This could include double hanging the Palisades-Snake Line.

Surveys for Greater Sage-grouse and other wildlife

The SDEIS has a map showing the Preliminary General Habitat (PGH) and Preliminary Priority Habitat (PPH) but does not provide maps showing the specific locations of historic or current leks or locations where verified sage-grouse sitings have been recorded. We also note that these PGH and PPH designations are preliminary by nature and may be adjusted in the next year. The analysis of impacts to sage-grouse, sharp-tailed grouse, nesting birds, and other wildlife species should not deferred to future surveys to conducted after a Record of Decision is signed and prior to construction:

> Conduct pre-construction surveys for sage-grouse and Columbia sharp-tailed grouse leks in sagebrush habitats.[7]
>
> Pre-construction surveys would be conducted for nesting bird species in furtherance of the Migratory Bird Treaty Act and Forest Goals.[8]
>
> Additional raptor surveys would e conducted for the Option 3A corridor prior to tree removal.[9]

The analysis of the potential impacts to wildlife is a key issue that should help determine which route is ultimately selected.

---

[5] Hooper Springs SDEIS p. A-13.
[6] http://energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/EIS-0267-FEIS-Summary-1998.pdf
[7] Hooper Springs SDEIS, p. 2-59.
[8] IBID, p. A-22.
[9] IBID, p. A-25.

NEPA requires federal agencies to take a "hard look" at the environmental consequences of their actions. *Kleppe v. Sierra Club*, 427 U.S. 390, 410, n.21 (1976); *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1211 (9th Cir. 1998). This "hard look" must occur *before* the agency takes action. *City of Tenakee Springs v. Clough*, 915 F.2d 1308, 1313 (9th Cir. 1990); *LaFlamme v. FERC*, 842 F.2d 1063, 1071 (9th Cir. 1988).

BPA seems to be underestimating the importance of doing thorough sage-grouse surveys in advance of route selection:

> If active leks are identified prior to ROW clearing activities, BPA would consult with USFWS personnel on mitigation or avoidance protocols.[10]

If active leks are identified prior to ROW clearing activities, it is far too late to discuss avoidance protocols. The time to identify and avoid leks is now, by selecting an alternative so the line avoids leks by several miles if at all possible.

In addition to mapping actual sage-grouse locations, the analysis should examine and disclose the quality of sagebrush habitat along each route. The categories used (such as sagebrush-dominated) are not sufficiently detailed to provide meaningful information relative to potential impacts to sage-grouse and other wildlife. Different species of sagebrush are more significant to sage-grouse than others and the presence of native forbs and perennial grasses is a key component in assessing the quality of sage-grouse habitat. The analysis needs to provide additional information of the quality of the vegetation along each route.

In terms of presenting information, the metrics used on p. 3-194 and 3-195 are inconsistent and make it harder to compare the impacts of different alternatives. The total area cleared is presented as an acreage amount in some alternatives while others are presented as "fewer acres", relative to the first description, instead of the actual amount (see description of Option 3A).

Sage-grouse and Infrastructure

The SDEIS states that the potential for occurrence in both the North and South Alternatives is high. Numerous studies have highlighted the negative effects of linear infrastructure on sage-grouse persistence. As mentioned in our previous comments, allowing development of a transmission line through this landscape could result in harmful, and potentially irreversible impacts to greater sage-grouse habitat, both by damaging sage-grouse habitat through the construction and maintenance of power lines and by providing perches for raptors and other birds of prey to more easily prey on sage-grouse. The U.S. Fish and Wildlife Service has found that transmission lines have a range of adverse impacts on sage grouse and their habitats. 75 Fed. Reg. 13909, 13928-29 (March 23, 2010). The Service's 12-month finding on sage grouse noted the many transmission line proposals pending in the western states and explained "If these lines cross sage grouse habitats, sage grouse will likely be negatively affected." Id at 13929. More recently, the BLM's Sage-grouse National Technical Team reached the same conclusion and recommended that the BLM "[m]ake priority 4 sage□grouse habitat areas exclusion areas for new [right-of-way] permits" with narrow exceptions. Id.

In addition, IM 2012-043 requires additional procedures for pending right-of-way applications that would affect more than one linear mile of sage grouse habitat. These procedures include a high-level

[10] Hooper Springs SDEIS, p. A-29.

interagency review process for any right-of-way project that would fail to "cumulatively maintain or enhance sage-grouse habitat." The sage-grouse habitat that will be affected by proposed project routes has been acknowledged by the BLM as potentially important for protection.

Furthermore, Guideline 2 of the Caribou Forest Plan for sage-grouse states that management activities should consider proximity to active lek locations during site-specific project planning. Those within 10 miles of an active sage-grouse lek should be considered further for suitability as grouse habitat. Despite one passage in the SDEIS stating that the Caribou-Targhee contained no sage-grouse habitat, a sage-grouse was seen on C-TNF land in 2007.

The SDEIS states that sage-grouse may be temporarily displaced[11] from areas where the transmission line is being constructed, however, recent studies strongly suggest that, while individual sage-grouse may return for a short period of time, sage-grouse populations will not persist in these areas. The analysis needs to correct this and describe this displacement as a permanent and irretrievable effect. In addition, BPA needs to examine how to best mitigate for this loss of viable sage-grouse habitat (see section below).

Sage-grouse Mitigation

The USFWS is expected to make a determination on whether to list sage-grouse under the ESA in 2015. If sage-grouse are listed, substantial restrictions on infrastructure developments in sage-grouse habitat may be enacted. If sage-grouse are not listed, it will be because of the creation and implementation of a comprehensive state plan to recover the species. This state plan will likely include some restrictions on infrastructure development in sage-grouse habitat, particularly in areas identified as Core or Important. Because of previous habitat disturbance in this area, these plans may treat this area as General Habitat which is less restrictive and which may allow infrastructure of this nature in this location.

A component of Idaho's Sage-Grouse Conservation Plan is a Sage-grouse Mitigation Framework for projects that impact sage-grouse habitat, including those in General Habitat. This Mitigation Framework is still in development but has been submitted to the BLM and USFWS as part of Idaho's Sage-grouse Alternative currently under review. This is a voluntary program but may have benefits over other mitigation programs. The concept is that developers could use this framework to offset impacts to sage-grouse habitat. Depending on the quality of the habitat and the nature of disturbance, mitigation funds could be assessed and directed to sage-grouse habitat improvement projects in Core and Important Areas. We are including a copy of the Mitigation Framework as a separate attachment. We would be happy to discuss this program with BPA for both this project and other BPA projects that may impact sage-grouse habitat.

Other wildlife

We are also concerned about impacts to other species of wildlife, particularly sand hill cranes, trumpeter swans and mule deer. We believe that additional analysis is needed on potential impacts and how to best avoid, minimize and mitigate them. We recommend that BPA use a Habitat Equivalency Analysis model to further quantify high quality habitats. We are also concerned about impacts to bird species that utilize the Gray's Lake National Wildlife Refuge, Blackfoot Reservoir and Blackfoot River Corridor. We recommend additional analysis for how to locate, mark and orient transmission lines to minimize any collisions.

[11] Hooper Springs SDEIS, p. G-3.

We appreciate the consideration of design features to minimize perching and nesting by raptors, but note that the single-pole construction is not used consistently. The analysis needs to provide further rational for why less-protective measures may be used in certain places.

Mitigation to the Blackfoot WMA

The EIS does not adequately address concerns to the Blackfoot Wildlife Management Area. The 2,400-acre Blackfoot WMA was purchased in 1994 by IDFG. The WMA encompasses 9 km of the upper Blackfoot River, bordered on the north by Spring, Lanes, and Diamond creeks and to the west by the Narrows. Historically, the Blackfoot River was an important stream for Yellowstone cutthroat trout and IDFG has taken steps to restore the Fishery. -Idaho Department Of Fish And Game Fishery Management Annual Report
Https://Research.Idfg.Idaho.Gov/Fisheries%20research%20reports/08-103.Pdf

Our members fish, hike, birdwatch and botanize in the Blackfoot Wildlife Management Area, as well as in the areas upstream and downstream. We note that the Blackfoot River WMA is on the Idaho Birding Trail. While we understand that Option 3A would be sited away from the Blackfoot River, we are concerned about the effective fragmentation of the WMA and the degradation of recreational experiences there. Our first preference is for the Blackfoot WMA to be avoided entirely. One of the missions of the WMA is to protect and manage wildlife resources as mitigation for habitat losses in other areas. The question that remains is how to mitigate impacts to an area which was designated as mitigation to begin with.

Before any route is selected, we recommend that BPA discuss mitigation options for each alternative with the State of Idaho and the Idaho Department of Fish and Game. Wildlife resources affected by the project (both inside and outside the WMA) need to be fully mitigated. Potential avenues to discuss with IDFG include long-term habitat improvements for focal species (Yellowstone cutthroat trout, elk, mule deer, Brewer's sparrows, and Northern Leopard frog), addressing improved monitoring, noxious weed treatments, improved outreach, education and enforcement efforts, and pertain to the most recent WMA objectives.

As mentioned previously, there are several examples of conservation and restoration work in the greater area that BPA may be interested in reviewing in order to develop a mitigation program for the project. These examples include the work of the Sagebrush Steppe Regional Land Trust, local conservation organizations, and the Upper Blackfoot Confluence. The Upper Blackfoot Confluence is a partnership of conservation groups and private companies dedicated to restoration activities in the Blackfoot River watershed. We recommend that any mitigation strategy be integrated on a watershed scale so that benefits of any individual projects are coordinated with other restoration activities for maximum benefit.

Resources in need of mitigation may include aspen, snags, bald eagle nesting platforms, enforcement of road closures, and increased monitoring. We note that the duration of the mitigation provided should last as long as the impacts persist.

Decommissioning unauthorized or redundant roads in the broader area could help on a number of fronts. Reduced road densities can reduce the pressure that firewood cutters place on snags that are important for wildlife. Road can also be decommissioned and be ripped to stimulate aspen growth. The C-TNF has an extensive aspen restoration program which could provide mitigation opportunities.

Wild and Scenic River Status
The SDEIS states that the transmission line would not have any effect on the eligibility of the Blackfoot River as a Wild or Scenic River. However, Option 3(A) would span the river twice. In addition, the SDEIS provides no analysis of how previous developments of this nature have or have not affected the designation of other rivers or the level of protections. Different designations (Wild, Scenic or Recreational) afford different degrees of protection. We believe that the development of the transmission line may downgrade the potential status of some reaches from "Scenic" to "Recreational" or may disqualify them entirely. The analysis needs to fully disclose these impacts and, if relevant, develop design features or alternatives to address them. The SDEIS states that BPA would consult with the National Park Service and C-TNF regarding any potential visual impacts. We believe that the time for such consultations is now, before an alternative is selected.

Aquatic life
Additional information is needed on how herbicide spraying along the ROW may affect water quality and aquatic life, particularly when the ROW may cross the Blackfoot River and numerous intermittent streams.

Forest Plan and BLM Amendments
Construction of any of the alternatives will require amendments to the Caribou-Targhee Forest Plan. We note that Guideline 5 for the Caribou National Forest specifically states that before new corridors are approved, consideration should be given to uprating, multiple circuiting, among other measures.[12]

Furthermore, Guideline 2 of the Caribou Forest Plan for sage-grouse states that management activities should consider proximity to active lek locations during site-specific project planning. Those within 10 miles of an active sage-grouse lek should be considered further for suitability as grouse habitat. Despite one passage in the SDEIS stating that the Caribou-Targhee contained no sage-grouse habitat, a sage-grouse was seen on C-TNF land in 2007.

We note that the way the sage-grouse analysis is being conducted appears to be inconsistent with BLM Internal Memoranda for sage-grouse.

Visual and Historic Resources
We are concerned about impacts to the Pioneer Historic Byway Corridor and the Landon Trail and ask BPA to conduct additional analysis of impacts and ways to further reduce them.

Gateway West
The Idaho Conservation League was recently involved with routing and mitigation measures for the Gateway West Transmission Line through the Morley Nelson Snake River Birds of Prey National Conservation Area. We served on a subcommittee for the BLM Boise District's Resource Advisory Council which was tasked with finding additional routes and evaluating a Draft Mitigation and Enhancement Portfolio submitted by Rocky Mountain Power and Idaho Power. In some places, we found that environmental effects from a transmission line could be minimized by co-locating it with existing lines. In some circumstances, raptor use of the area could actually be enhanced through the creation of new nesting structures. We also helped develop a suite of recommendations so that, if the project proceeded, the specific purposes for which the NCA was designated could be enhanced. A key component to the mitigation package was that the benefits need to persist as long as the impacts persist.

[12] Hooper Springs SDEIS p. A-13.

While the Hooper Springs scenario is greatly different, there may be some similarities, particularly with regard to mitigation and enhancement strategies. Please incorporate the RAC's recommendations with our comments:

http://www.blm.gov/id/st/en/get_involved/resource_advisory/boise/RAC-subcmte_GWW.html

http://www.blm.gov/pgdata/etc/medialib/blm/id/get_involved/racs/boise.Par.72594.File.dat/Gateway West RAC Subcommittee MEP Review Final Report 20140530.pdf

Access Roads
BPA should consider using short, spur roads to access each tower instead of a single road along the ROW if the combined effects are lesser. Mitigation for access roads could be reduced road densities in the surrounding area. This would help reduce illegal OHV use, sediment delivery to streams, wildlife disturbance and noxious weed expansion.

Cumulative effects
As mentioned previously, there are a number of other developments in this area, including exploration and expansion of phosphate mines, that may have cumulative environmental effects. We are particularly concerned about water quality, habitat fragmentation, noxious weed expansion, and loss of secure habitat by wildlife. The analysis should take a more thorough look at the cumulative effects more thoroughly and develop alternatives that avoid, minimize and mitigate these impacts.

Boise District Resource Advisory Council Subcommittee Review and Comments on the Gateway West Transmission Line Project Mitigation and Enhancement Portfolio for the Morley Nelson Snake River Birds of Prey National Conservation Area

May 30, 2014

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INTRODUCTION

The Boise District Resource Advisory Council (RAC) advises and makes recommendations to the Bureau of Land Management (BLM) on resource and land management issues in southwestern Idaho. The RAC formed a subcommittee in November 2013 to work on issues surrounding siting the Gateway West Transmission Line Project (GWW) in portions of the Boise District in and around the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA), as well as on private lands. The subcommittee began evaluating the issues related to the GWW, as described in the *Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area* which accompanies this report. The accompanying report summarizes our route option review and recommendations relative to the GWW within and near the BOPNCA.

One task that the subcommittee has undertaken is an evaluation of the Draft Mitigation and Enhancement Portfolio Proposal (Draft Portfolio) prepared by Rocky Mountain Power and Idaho Power Company (hereafter the Companies). The Companies originally submitted the Draft Portfolio to BLM during the comment period for the GWW final environmental impact statement (FEIS) and then revised the document and submitted it to the RAC subcommittee for further evaluation in January 2014. This report presents a summary of the Draft Portfolio and the subcommittee's comments and recommendations for consideration by the RAC, BLM and the Companies in finalizing this important component of GWW.

The Draft Portfolio submitted by the Companies is designed to go above and beyond the standard mitigation requirements (which includes avoidance and minimization through implementation of design features and environmental protection measures/best management practices), which are addressed separately in the permitting process. The Draft Portfolio includes both compensatory mitigation and enhancement components. The compensatory mitigation program addresses the "residual effects" which persist after standard mitigation has been implemented. This additional mitigation is required to return an impacted area to baseline conditions[1]. The enhancement program is designed to go beyond the compensatory mitigation and create a net benefit to the BOPNCA relative to current conditions. The enhancement program has been tailored to the special features of the BOPNCA and the desired future conditions, as determined by the BLM.

The mitigation and enhancement program in the Draft Portfolio should be designed to last the duration of the project permit and monitored throughout:

[1] For the purposes of this report, baseline conditions are based on the ecological site potential for a specific area.

> The BLM should ensure adequate management, protection, and monitoring of the mitigation during the expected lifetime of the development project and its associated impacts.-Draft MS-1794 – Regional Mitigation Manual Section (P) http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2013.Par.57631.File.dat/IM2013-142_att1.pdf

A mitigation and enhancement plan should be consistent with the enabling legislation for BOPNCA, Public Law 103-64, which established the BOPNCA in 1993 for the following purposes:

> The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.
>
> Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area.
>
> Section 1((5)(D) states, "Protection of the conservation area as a home for raptors can best and should be accomplished by the Secretary of the Interior, acting through the Bureau of Land Management, under a management plan that: (...) (D) allows for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats and protection and sound management of other resources and values of the area."
>
> Section 2002 of Public Law 111–11—Mar. 30, 2009, established the National Landscape Conservation System (NLCS) within the BLM and automatically made Snake River Birds of Prey National Conservation Area, among other National Conservation Areas and other special areas, part of the NLCS. Public Law 111-11 specifically mandated the NLCS to uphold the enabling legislation for each of the components of the NLCS. Section 2301 added "Morley Nelson" to the NCA's title to recognize the contribution of that individual.

Morley Nelson was the first to recognize the significance of what is now the BOPNCA, and his life work was dedicated to demonstrating that raptor protection could be compatible with electrical power transmission and distribution.

The BOPNCA is included in the National Landscape Conservation System, which was created in 2000 with a mission to "conserve, protect, and restore these nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations." This system was formally established by Congress through the Omnibus Public Land Management Act of 2009 and includes 878 federally recognized areas and approximately 27 million acres of National Conservation Areas, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers, National Monuments, National Scenic and Historic Trails, and other special areas. The BLM's National Conservation Lands include 16 NCAs and five similar units in ten states.

To authorize a right-of-way under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that: 1) the use is compatible with the enabling legislation of the BOPNCA (PL 103-64, BLM 2012a); 2) the agency has avoided impacting the BOPNCA to the greatest extent possible (MS 6220); 3) impacts to Greater sage-grouse (BLM 2012b), private property, and local communities, among others, are considered; and 4) an enhancement program will result in a net benefit to the NCA for the duration of the permit (PL 103-64). This report focuses on item 4.

HISTORY OF INFORMATION SUBMITTED

The following is a chronology of information submitted or presented to the subcommittee related to the requirement for a mitigation and enhancement plan for the BOPNCA:

- On December 17, 2013, the Companies gave a presentation on the proposed Draft Portfolio at the RAC subcommittee meeting. The subcommittee held a discussion following the presentation. Comments were later developed by subcommittee members and one member of the public, Michael N. Kochert. The document submitted by Mr. Kochert was titled "Comments on the Gateway West Enhancement and Mitigation package". This document is dated January 5, 2014 and is included as Attachment A.

- On January 13, 2014, the Morley Nelson Snake River Birds of Prey National Conservation Area Gateway West DRAFT Mitigation and Enhancement Portfolio Proposal was transmitted via email to the subcommittee with applicable Environmental Protection Plans (Appendix A) and Cost Estimator tables for BOPNCA Enhancement (Appendix B). The document was prepared by the Companies and dated January 2014.

- On January 16, 2014, the Companies provided an update on the Draft Portfolio to the subcommittee focusing on proposed route Segments 8 and 9 and the components of the plan including habitat restoration, law enforcement, visitor enhancement, land purchase, and existing facility removal. The Draft Portfolio also proposed an oversight committee made up of members with an intimate knowledge of the area. A discussion followed the

update, and comments were provided to the Companies by the subcommittee and the public. These comments are included later in this document.

- On January 28, 2014, the subcommittee provided a brief overview of the Draft Portfolio during the RAC meeting.

- On February 26, 2014, a representative of the Idaho Army National Guard (IDARNG) presented an overview of the Mitigation and Enhancement Program for the Orchard Combat Training Center (OCTC) which is also within the BOPNCA.

- On March 3, 2014, the BLM circulated a list of questions submitted by subcommittee members regarding the Draft Portfolio in preparation for the March 10, 2014 subcommittee meeting.

- On March 10, 2014, the Companies presented an update of the Draft Portfolio and responded to the questions posed by the subcommittee. In addition, a panel discussion was held that included representatives from the BLM, U.S. Geological Survey (USGS), the Audubon Society, and Intermountain Rangeland Consultants regarding the challenges and opportunities in restoring habitat in the BOPNCA. The panel discussion was followed by a presentation by a retired USGS raptor expert on raptor monitoring issues. The Companies also responded to the questions previously circulated by the BLM (see previous item).

- On March 11, 2014, the subcommittee received draft comments from the Golden Eagle Audubon Society in a document titled "Gateway West Mitigation and Enhancement Portfolio – DRAFT Greater Eagle Audubon Society (GEAS) Comments – February 27, 2014". These comments are included as Attachment B.

- On April 2, 2014, the Companies gave a presentation of a summary of the Draft Portfolio. One objective of the presentation was to provide a distinction between mitigation and enhancement portions of the Draft Portfolio and separately discuss the components of each. The Companies also showed how the funding in the Draft Portfolio could be scaled depending on the routes selected and provided a handout showing how to use the Gateway West Snake River Birds of Prey Enhancement and Mitigation Calculator.

- On April 23, 2014, the Companies provided an estimate of the enhancement funding for the routes recommended by the subcommittee, as well as for all other route options that have been considered by the subcommittee for reference.

SUMMARY OF THE COMPONENTS AND THE PROPOSED FUNDING IN THE DRAFT PORTFOLIO

The Companies first submitted the Draft Portfolio in June 2013 during the FEIS comment period. The Portfolio described "a proposed approach to determine the level of mitigation and enhancement needed to allow for the approval of both Segments 8 and 9." Proposed funding levels in the Draft Portfolio were based on modified versions of the Companies' proposed routes in the FEIS. Proposed Segment 8 was modified by Alternatives 8D and 8E, and Proposed Segment 9 was modified by Alternative 9G. These routes are identified in the subcommittee's report on route options as "Draft Portfolio Proposed Routes." The anticipated level of disturbance and line mileage within the BOPNCA for the Draft Portfolio Proposed Routes can be considered "a metric than can be applied regardless of the alternative route considered". In other words, the proposed compensatory mitigation and enhancement for the Draft Portfolio Proposed Routes can be considered a baseline proposal. In the event that different route options are selected by BLM, portions of the compensatory mitigation and enhancement for the BLM selected routes would be determined by a ratio or scaling factor applied to the Draft Portfolio Proposed Routes. In describing the impact of the project on the BOPNCA, the Companies used results of the FEIS analysis, which addressed impacts to cultural resources, plant and wildlife resources (general vegetation, invasive plant species, wetlands, and special status plant species), and raptors and their habitat.

The Draft Portfolio consists of 1) measures and plans for avoidance, minimization, restoration, and compensatory mitigation to offset residual impacts; and 2) elements to enhance the objects and values of the BOPNCA. This review is limited to a review of the components of compensatory mitigation and enhancement. Compensatory mitigation in the Draft Portfolio includes:

- **Habitat Restoration**. Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to reclamation of temporary disturbances. The acreage used in the calculation is scaled by impact and is based on the operational footprint of the project such as a tower footprint and any new permanent access roads. Habitat restoration efforts will be directed towards a return to native vegetation.

- **Law Enforcement**. Funding for part-time law enforcement is proposed to focus on and minimize/eliminate illegal behavior, particularly in response to new permanent access roads.

The Companies indicate that impacts to cultural resources will be mitigated by implementation of the Segment Historic Properties Treatment Plans and a Historic Trails Mitigation Plan. Also, in the event that there would be any impacts to wetlands or riparian areas, those impacts would be offset and mitigated by the implementation of the wetland mitigation plan titled

"Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the United States". Table 1 provides the estimated cost of the compensatory mitigation components in the Draft Portfolio.

Table 1. Estimated Cost of Compensatory Mitigation.

Element	Habitat Restoration	Law Enforcement ¼ FTE for 10 years	Total
Compensatory Mitigation	$266,400	$350,000	$616,400

Enhancement in the Draft Portfolio includes:

- **Habitat Restoration**. Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to compensatory mitigation and the reclamation of temporary disturbances. The acreage used in the calculation is based on the construction footprint of the project, which is larger than the operational footprint. The funding is scalable depending on the number of acres and the quality of land affected by the project. High quality lands, such as undisturbed habitat, would be mitigated with a higher number of acres, while lower quality land, such as land occupied by invasive species, would be mitigated with a lower number of acres. Habitat restoration would be aggressive and concentrated with the intent of a high success rate for each acre restored. Habitat restoration efforts will be directed towards a return to perennial vegetation.

- **Land Purchase.** Funding for land purchase is proposed by the Companies to protect cultural resources and habitat. The Companies would provide funding to be used for the purchase of property(ies) with unique cultural, visual, and/or ecological values to further protect those resources from future damage. Properties would be purchased from willing sellers within the BOPNCA boundaries, and the amount of money offered for property purchase would be scaled using the miles of the BOPNCA crossed by the proposed route.

- **Law Enforcement.** Funding for law enforcement is proposed by the Companies to reduce inappropriate behavior within the BOPNCA. The Draft Portfolio provides for a BLM ranger to offset potential unlawful activity that may be associated with the increased access created by new rights-of-way and maintenance roads. The funding is scaled by line miles of the routes within the BOPNCA and would last for an initial 10-year period followed by an additional 10 years but with funding for fewer hours per week.

- **Visitor Enhancement.** Funding for visitor enhancement is proposed by the Companies to educate visitors of the values of BOPNCA and in the appropriate behavior within and use of the BOPNCA. This funding is also scaled by line miles of the routes within the BOPNCA.

- **Management Fund.** A management fund is proposed by the Companies to cover the costs of the oversight committee, administration, and monitoring. The management fund, regardless of routes ultimately approved by the BLM, is a fixed amount equal to the amount currently proposed. The oversight committee would be made up of people with knowledge of the BOPNCA and surrounding area.

- **Idaho Power Existing Facility Removal**. The Companies propose to remove portions of two existing lower-voltage power lines and one substation owned by Idaho Power from areas within the BOPNCA to further enhance the BOPNCA. The BLM could elect to leave some of the power poles from the removed lines as perching and nesting opportunities for birds of prey. The Companies still have customers to serve in these areas and have included in the removal of the lower-voltage power lines the additional infrastructure required (which is outside the BOPNCA) to continue service to these customers.

Table 2 provides the estimated cost of the enhancement components based on the Draft Portfolio Proposed Routes. The total cost of compensatory mitigation and enhancement is shown on Table 3.

Table 2. Estimated Cost of the Enhancement Components of the Draft Portfolio.

Element	Habitat Restoration	Law Enforcement ¾ FTE for 10 years, ½ FTE for an additional 10 years	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
Enhancement	$3,297,600	$1,750,000	$320,000	$500,000	$1,922,000 (cost to Companies)	$1,000,000	$6,867,600 (excluding line removal costs)

Table 3. The Estimated Total Cost of Proposed Compensatory Mitigation and Enhancement Components.

Element	Habitat Restoration	Law Enforcement ¾ FTE for 10 years, ½ FTE for an additional 10 years	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
Mitigation	$266,400	$350,000	--	--	--	--	$616,400
Enhancement	$3,297,600	$1,750,000	$320,000	$500,000	$1,922,000 (cost to Companies)	$1,000,000	$6,867,600 (excluding line removal costs)
TOTALS	$3,564,000	$2,100,000	$320,000	$500,000	$1,922,000 (cost to Companies)	$1,000,000	$7,484,000 (excluding line removal costs)

The total cost of the Draft Portfolio based on the Companies proposed routes, including costs incurred by the Companies to remove Idaho Power facilities is $9,406,000.

During the April 18, 2014 meeting, the subcommittee completed the identification and categorization of alternative routes for Segments 8 and 9 in and around the BOPNCA. The subcommittee classified route options as either recommended or not recommended. The subcommittee then requested that the Companies provide an estimated enhancement funding value for the recommended routes. The Companies provided the estimated enhancement funding for all subcommittee route options (routes ranked recommended and not recommended), and the values and other information are provided in Table 4.

In addition to Table 4, the Companies also provided the following summary information and example calculation of the estimated enhancement funding values using the subcommittee recommended routes:

- Companies' Draft Portfolio Proposed routes
  - Segment 8 with 8D and 8E – *36.6 miles*
  - Segment 9 with 9G – *52.3 miles*
- Subcommittee recommended alternative routes – miles on BLM within the BOPNCA
  - Segment 8, Summer Lake Option 1 revised – *15.4 miles*
  - Segment 9, Baja Road-Murphy Flat South revised – *46.1 miles*
- Percentage of subcommittee recommended alternative line miles to Companies' Proposed routes
  - Segment 8, Summer Lake Option 1 revised – 15.4/36.6 = *42.08%*
  - Segment 9, Baja Road-Murphy Flat South revised – 46.1/52.3 = *88.15%*

- Estimated enhancement funding value of subcommittee recommended route options based on Companies' proposed enhancement funding amount for habitat restoration, land purchase, law enforcement, and visitor enhancement for each segment
    - Segment 8, Summer Lake Option 1 revised – $2,527,765*42.08% = *$1,063,684*
    - Segment 9, Baja Road-Murphy Flat South revised – $3,339,835*88.15% = *$2,944,065*
- Total estimated enhancement funding value for subcommittee recommended route options
    - $1,063,593 + $2,943,908 + $1,000,000 (management fund) = **$5,007,501**
- Total value of estimated enhancement for subcommittee recommended route options
    - $5,007,503 + $1,922,000 (Idaho Power facility removal) = **$6,929,503**

Table 4. Subcommittee Route Options Estimated Enhancement Funding.

Route	BLM*	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
Segment 8				
Draft Portfolio Proposed Route 8	36.6	Not recommended	100%	$2,527,765
Applicant Proposed (FEIS)	25.4	Not recommended	69.40%	$1,754,241
Bowmont North	4.8	Not recommended	13.11%	$331,510
Bowmont South	12.1	Not recommended	33.06%	$835,682
Bowmont South - 500kV Rebuild	0.7	Not recommended	1.91%	$48,345
King Hill-Mayfield	1.7	Not recommended	4.64%	$117,410
Melmont Option 1	9.3	Not recommended	25.41%	$642,301
Melmont Option 2	9.4	Not recommended	25.68%	$649,207
OCTC Alpha Sector By-pass Variation (FEIS Alt 8D)	2.9	Not recommended	7.92%	$200,287
Sinker Butte (FEIS Alt 8E)	38.6	Not recommended	105.46%	$2,665,894
Summer Lake (Option 2)	18.8	Not recommended	51.37%	$1,298,415
Summer Lake Option 1	15.4	Recommended	42.08%	$1,063,595
Segment 9				
Draft Portfolio Proposed Route 9	52.3	Not recommended	100%	$3,339,835
Applicant Proposed (WWEC Alternative - FEIS)	4.8	Not recommended	9.18%	$306,524
Baja Road-Murphy Flat North Option 1	48.7	Not recommended	93.12%	$3,109,942
Baja Road-Murphy Flat North Option 2	47.1	Not recommended	90.06%	$3,007,767
Baja Road-Murphy Flat North Option 3	48.7	Not recommended	93.12%	$3,109,942

Table 4. Subcommittee Route Options Estimated Enhancement Funding.

Route	BLM*	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
Baja Road-Murphy Flat S	46.1	Recommended	88.15%	$2,943,908
Baja Road-Sinker Creek	43.7	Not recommended	83.56%	$2,790,646
Baja Road-Summer Lake	46.7	Not recommended	89.29%	$2,982,223
Bruneau South Variation (FEIS Alt 9H)	1.4	Not recommended	2.68%	$89,403
Cove Variation (FEIS Alt 9D)	5.8	Not recommended	11.09%	$370,383
Glenn's Ferry-Mayfield	2	Not recommended	3.82%	$127,718
Owyhee Uplands (DEIS Alt 9E)	2.7	Not recommended	5.16%	$172,420
Owyhee Uplands (FEIS Alt 9E)	5	Not recommended	9.56%	$319,296
Sinker Creek Variation	0.2	Not recommended	0.38%	$12,772

** Miles of transmission line on BLM managed land within the BOPNCA.

** Includes funding for habitat restoration, land purchase, law enforcement, and visitor enhancement. Does not include management funding ($1M) and does not include cost to Companies for facility removal ($1.922M).

RAC SUBCOMMITTEE AND PUBLIC COMMENTS AND RECOMMENDATIONS ON THE DRAFT PORTFOLIO

General Comments

The subcommittee commends the Companies for including several components that address important BOPNCA values in their Draft Portfolio. We agree with the apparent long-term commitment implied by the financial support designated for law enforcement, the management oversight group, and cultural resources protection. Although we may disagree with the dollar amounts proposed in both real and relative terms, we agree that a long-term commitment is necessary to mitigate the direct impacts of the GWW project through the BOPNCA and to enhance the area for future generations.

The subcommittee also commends the Companies for their continued involvement and cooperative interaction during the course of the 6-month process of the subcommittee meetings and deliberations. We have learned from the Companies and sincerely appreciate their cooperation and adaptability during the process.

The BOPNCA was established to protect raptor populations and habitats and the natural, environmental, scientific, cultural and educational resources found within the conservation area. The enhancement package applies to these resources. In addition, the enhancement package must take into account the current resources available to protect the NCA. Native vegetation in the NCA has suffered greatly due to fires, off-road vehicle use and a lack of restoration resources. On the other hand, there are dozens of groups in the Boise area conducting outings and tours to educate the public about the NCA. The enhancement package should focus on the resources within the NCA that are most in need of enhancement- raptor populations, habitats and the natural environment. This includes restoring native habitat, closing and monitoring roads that fragment the landscape, and decreasing the destructive impacts of fires.

Lastly, while the subcommittee thanks the Companies for their expertise during this process, we cannot endorse the enhancement package as presented. The Companies' enhancement package proposes a myriad of various projects without demonstrating how standards of enhancement will be met during the life of the project. We encourage the BLM to take a hard look at the true cost of enhancement. The enhancement package should not be punitive, but must meet the high standards outlined in the NCA legislation.

The Subcommittee did not reach a conclusion on the funding levels contained in the Draft Portfolio. However, the general consensus of the subcommittee is that the proposed funding levels are too low. As BLM moves forward with any additional NEPA reviews the Subcommittee recommends that BLM explore how successful mitigation and enhancement packages have been developed in other areas of the country. Settling upon a dollar amount for mitigation and enhancement will entail numerous negotiation sessions between the Companies

and BLM. Hopefully, it will include some background assessments of the environmental, social and economic benefits and costs of lines crossing the BOPNCA. We encourage the BLM and the Companies to derive a valid economic assessment of the benefits and costs of the actions specific to the BOPNCA for the NEPA process.

The subcommittee found that the Draft Portfolio did not adequately address enhancement of raptor populations and scientific resources and values, and we recommend that it be expanded to include components to enhance these two important values recognized by the enabling legislation. In addition, we recommend that Law Enforcement and Visitor Enhancement be combined into one category, called Visitor Management which would also include Education. There should be separate categories for Enhancement of Raptor Populations and Research and Monitoring. The subcommittee recommends that the BLM and the Companies re-evaluate priorities and revise the proposed allocations among these components.

To be consistent with the enabling legislation, the RAC subcommittee recommends that the Draft Portfolio should seek to conserve, protect, and enhance these specific resource issues:

- Raptor populations;
- Raptor habitats (raptor habitat includes the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the BOPNCA);
- Natural and environmental resources and values associated with the BOPNCA;
- Scientific resources and values of the public lands in the BOPNCA;
- Cultural resources and values of the public lands in the BOPNCA; and
- Educational resources and values of the public lands in the BOPNCA.

We believe that the Draft Portfolio should be designed and implemented with the following considerations:

- Be consistent with the BOPNCA Enabling Legislation and highlight the relevant features, particularly raptors, their prey and the supporting habitat;
- Be diverse: contain a diverse portfolio of enhancement options, some of which the Draft Portfolio contains;
- Be durable: the functional time span of each component of the Draft Portfolio needs to be discussed, and the benefits need to last for as long as the impacts of the transmission line are expected to be present;
- Accurately assess the probability of restoration success: the measure of success should not be the number of attempts at restoration, but achieved restoration to a set of pre-agreed upon criteria;
- Protect high-quality habitat and restoration areas: successful restoration efforts need to be protected; and

- Be reasonable (both locally and nationally): the enhancement opportunities provided by the Draft Portfolio should not relieve the BLM of their responsibility to provide funding to manage the BOPNCA. That said, the enhancement components of the Draft Portfolio should be substantive.

SPECIFIC COMMENTS AND RECOMMENDATIONS

Habitat Restoration

The subcommittee believes that the Draft Portfolio should contain an integrated and adaptive approach with a long-term focus for habitat restoration in the BOPNCA using current scientific research and information as presented to the subcommittee on March 10, 2014 by representatives from the BLM, USGS, the Audubon Society, and Intermountain Rangeland Consultants. We believe that innovative methods for rangeland restoration should be evaluated and pursued within the BOPNCA that could eventually be used broadly to help manage lands outside the BOPNCA.

As we have discussed during the deliberations of the subcommittee, the concept of "baseline" conditions needs careful consideration and a clearer definition. Efforts at restoration and rehabilitation should be undertaken with the awareness that the BOPNCA includes some of the harshest environments in the Great Basin. The BOPNCA is in an environment that experiences extremely low precipitation, high summer temperatures, and invasion of habitat-altering annual grasses, all of which increases fire frequency. It will be extremely difficult to accomplish the restoration goals of the BLM and Companies without strategic planning and implementation that may include repeated efforts to establish vegetation in this harsh environment. We recommend that areas proposed for habitat restoration and enhancement be defined in detail via maps. However, we have concerns that small-scale, intensive and very expensive rehabilitation efforts will ultimately fail due to repeated fires, lack of maintenance, and other factors. We would prefer seeing larger, strategic areas treated than the small microcosms described in the Draft Portfolio.

We recommend that the portfolio's emphasis on small microcosms be reduced and combined with a landscape-scale strategy for habitat protection, restoration, and enhancement. Key remnant native sagebrush (*Artemisia*) patches within the BOPNCA that exhibit ecological integrity and are still "intact" should be identified, and preserving their integrity should be a priority. The subcommittee recommends that remnant stands of sagebrush and other perennial vegetation such as winterfat (*Krascheninnikovia lanata*) be protected using strategically placed firebreaks and other tools. Firebreaks may later be modified to protect newly restored and connected patches to help ensure protection from future fires. Successful protection of remaining habitat and restoration investments will require decreasing the response time of fire suppression efforts and increasing the response capability. These goals could be accomplished through a variety of partnerships and cooperative programs, including, but not limited to, the following:

- Providing additional fire-fighting resources (equipment, training, staff and funding, etc.);
- Updating cooperative agreements and coordinated response programs with rural fire departments, municipal Fire Departments, and Rangeland Fire Protection Associations to reduce the response time; and
- Updating the Idaho Fire Prevention Plan[2] to better protect native vegetation within the BOPNCA by preventing human-caused wildfires.

Enhancement of Raptor Populations

The first step in maintaining and enhancing raptor populations is to ensure that the new transmission lines have no adverse effects on raptors. Ultimately, enhancement measures should improve or at least maintain current raptor population levels. The permitting process should disallow line construction within the BOPNCA during the nesting season (February-August) to avoid direct disturbance to nesting raptors. Biologists and engineers should work together to design towers that are friendly to raptors but not to ravens. For example, the density of steel latticework on the bridge above the conductors should be as low as possible to discourage raven nesting. Towers with tubular metal poles may not benefit raptors because of vibrations and the lack of suitable perching and nesting sites.

The Draft Portfolio should include funding for construction of artificial platforms on transmission towers within the BOPNCA that will provide nesting sites at a safe location below the conductors. New towers in areas that replace or parallel existing lines should be designed in a way to encourage continued nesting by raptors, particularly ferruginous hawks (*Buteo regalis*), which are currently nesting on existing transmission towers. Where existing lines are planned for removal, structures that are suitable for raptor nests and perches should be left intact. Artificial nesting platforms can provide new and alternative nesting substrate for raptors, particularly ferruginous hawks and golden eagles (*Aquila chrysaetos*), in areas without cliffs or existing transmission lines (e.g., Murphy Flat). Providing opportunities for nesting on taller structures might benefit eagles on the Owyhee Front by reducing their exposure to disturbance from off highway vehicles.

Enhancing raptor populations requires enhancing prey populations, and prey populations are best enhanced by managing their habitat. The two principal prey species within the BOPNCA are the Piute ground squirrel (*Urocitellus mollis)* and the black-tailed jack rabbit *(Lepus californicus).* Ground squirrels are the primary prey of prairie falcons (*Falco mexicanus*), the raptor species for which the BOPNCA was first recognized and created. Jack rabbits are the primary prey of golden eagles. Jackrabbits require shrubs for food and cover; ground squirrels thrive best in vegetation communities dominated by native perennial shrubs and grasses.

[2]http://www.blm.gov/pgdata/etc/medialib/blm/id/fire/fire_restriction_maps.Par.70675.File.dat/2013_IdahoFireRestrictionsPlan_508.pdf

Restoring habitat and increasing prey populations will benefit raptors, but additional measures to enhance raptor populations directly should be included in population enhancement strategies. We recommend that a proactive and accelerated program for retrofitting distribution lines within the BOPNCA be undertaken to reduce the potential for electrocution of raptors. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following guidelines described in the Avian Power Line Interaction Committee's publication "Suggested Practices for Avian Protection On Power Lines: The State of the Art in 2006" (APLIC 2006). More frequent patrols should be conducted to determine if poles being used by raptors are raptor-safe.

Research and Monitoring

The subcommittee recommends that the Companies provide funding for research and monitoring in the BOPNCA. We recommend that effective monitoring be proposed at all trophic levels. Habitat restoration should be monitored in conjunction with trends in prey and raptor populations. Monitoring should focus on the effects of the new transmission lines and associated mitigation and enhancement efforts, but to be effective, it must consider resources throughout the BOPNCA.

We believe that the Draft Portfolio should specify a vegetation monitoring plan for native shrubs, grasses, and forbs that will allow an evaluation of the effectiveness of habitat restoration and an understanding of success rates. The monitoring information will be the basis for adapting the restoration approach to challenges and failures so that long-term success can be achieved. The results and findings should be considered as a model for other sites across the West where sagebrush recovery and restoration are needed.

We recommend that monitoring protocols be put in place to understand the effects of transmission lines and raptor response to nest and perch enhancement and identify any negative impacts of power line construction. Use of the new transmission lines by raptors and ravens should be monitored as it was along the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993).

Monitoring trends in raptors nesting on transmission lines must be carried out in conjunction with monitoring population trends throughout the BOPNCA. The Ferruginous Hawk should be a priority for monitoring because it is the species most likely to respond to transmission lines within the BOPNCA Priorities and approaches for monitoring raptors throughout the BOPNCA should follow recommendations from the Raptor Monitoring Workshop held in June 2008 (Attachment C). Golden Eagles and Prairie Falcons should be a high priority for monitoring because these species were cornerstones in establishing the BOPNCA and because a large set of background data has been collected on them. The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and the jackrabbit's status is associated with shrub habitat. The Prairie Falcon is a ground squirrel specialist and is sensitive to changes in ground

squirrel abundance as a result of climate change and habitat alteration. Prairie Falcon nesting populations in the canyon have not been assessed since 2003. Future studies should be designed to assess whether these three important species are or are not adapting to habitat changes that have occurred. Species that respond favorably to shrub loss (e.g., northern harriers [*Circus cyaneus]*, short-eared owls [*Asio flammeus]* or agricultural development (e.g., Swainson's hawks [*Buteo swainsoni]*, red-tailed hawks [*Buteo jamaicensis*], American kestrels [*Falco sparverius]*) should be a lower priority for research and monitoring.

We recommend that the Draft Portfolio also provide for monitoring trends in small mammal populations that are key prey species (ground squirrels and jack rabbits) on a landscape level throughout the BOPNCA. The monitoring of small mammals should be coordinated with raptor monitoring.

New and improved access roads associated with transmission line construction and operation could increase recreational shooting near the lines. There is a concern that elevated soil concentrations of lead from shooting and trash and litter accumulation could have long term impacts on prey and raptor populations. The Companies should propose studies that evaluate the extent of lead in the environment in the BOPNCA and examine potential solutions. There also may be a need to examine the effects of recreational shooting on raptor and prey populations.

Proposed research and monitoring should recognize and take advantage of previous work undertaken within the BOPNCA. This component should include the resources necessary to perform an integrated and adaptive approach. We view the oversight committee as being critical in helping to define both integrated research objectives and monitoring needs of the area. Biologists from several agencies and universities are currently conducting research projects within the BOPNCA. We recommend that the oversight committee be proactive in focusing, prioritizing, and integrating these and future research efforts to ensure that they address BLM's long-term and short-term needs in a coordinated way. The Companies should consider funding a repository for archiving and disseminating data collected in the BOPNCA to be used by both researchers and managers. The NCA Research Group recently identified a need to compile available data from previous studies and monitoring efforts, and to make these data available and accessible. We recommend formalizing and expanding the research and monitoring program to maximize the benefits and leverage additional funding opportunities. One possibility would be to create an endowment (see below) to fund research and monitoring into the future.

Visitor Management

We are pleased that the Draft Portfolio includes funding for enhanced BLM law enforcement patrols. This funding should continue for the duration of the permit. An expanded on-site presence will reduce degradation caused by irresponsible public recreational use. Partnering with local communities and civic groups could expand opportunities for visitor contact within the

BOPNCA. Again, the oversight committee can provide guidance about this important component of the Draft Portfolio.

The BLM already has an excellent public education program for the BOPNCA. It employs a full time Environmental Education Specialist, dedicated to the BOPNCA. This specialist gives more than 100 presentations at schools and special events each year and contacts more than 8,000 individuals. The BLM has a sign management plan for the BOPNCA, maintains a website about the BOPNCA, and has developed a visitor's guide that contains general maps of the BOPNCA, raptor viewing information, and recreational opportunities. Public education about NCA raptors and their habitat also occurs at the Peregrine Fund's World Center for Birds of Prey, the Idaho Fish and Game's MK Nature Center, Canyon County's Celebration Park visitor center, and the Kuna Chamber of Commerce visitor facility. The Snake River Raptor Volunteer group is also involved in public education. The subcommittee finds that public education is currently closer to meeting objectives than other programs.

Land Purchase

The Companies' recommendation for property purchase was based on enhancing the preservation of cultural resources. We recommend re-evaluating whether land purchase should be a priority or whether it would be best to invest funds in an endowment (see below) to enhance all resources and values over a longer time frame. If land purchase is a component of the enhancement package, some degree of funding should be included to help manage these lands.

Fund Management

The Subcommittee believes that BLM should explore establishing a fund located with a third party, such as an Idaho state agency, to receive and manage enhancement funds on behalf of the BLM. The state agency would distribute funds at the direction of BLM with the advice of the Implementation and Oversight Committee.

Implementation and Oversight Committee

The Companies have suggested creating and funding an oversight committee to make recommendations to the BLM on the implementation of the enhancement program. We recommend that the oversight committee include interested and involved people with local expertise on each of the trophic levels (plants, prey, and raptors). The structure, responsibilities and management of the oversight committee have yet to be determined. One option is for the oversight committee to be a subcommittee of the Boise District RAC. However, we view the oversight committee as being critical to the long-term sustainability of the BOPNCA and the Companies' success with implementation of the Draft Portfolio. We recommend that the BLM establish the oversight committee as soon as feasible and seek their involvement in the immediate and long-term decisions needed to sustain the integrity of the BOPNCA.

Duration of the Enhancement Components

The BLM should ensure that adequate funding is provided for enhancement components during the period for which the right-of-way permit is granted. Contingencies for responding to fires that may impact restoration areas should be included in the permit. The relevant issues should be revisited to determine if the goals of enhancement have been met when the permit is renewed.

Allocation Prioritization

We respectfully attempt to categorize and prioritize the efforts and funding implied in the Draft Portfolio. We recommend that the BLM consider the enhancement components in the following order of priority:

- Enhancement of Raptor Populations
- Habitat Restoration
- Research and Monitoring
- Implementation and Oversight Committee
- Visitor Management
- Land Purchase

We believe it is important that the BLM ensure adequate funding for all enhancement components. It is especially important for the first four categories listed above.

REFERENCES

Avian Power Line Interaction Committee (APLIC). 2006. *Suggested practices for raptor protection on power lines; the state of the art in 2006.* Edison Electric Institute; Raptor Research Foundation, Washington, D.C. USA.

Bureau of Land Management. (2012a). *Instructional memorandum no. 2012-043, Greater Sage-Grouse Interim Management Policies and Procedures.* Issued by the Director of the Bureau of Land Management. Washington, D.C. February 2012.

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Steenhof, K., M.N. Kochert, L.B. Carpenter, and J.A. Roppe. 1993. *Nesting by raptors and common ravens on electrical transmission line towers.* J. Wildl. Manage. 57(2):271-281.

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ATTACHMENT A

Comments on the Gateway West Enhancement and Mitigation package from Michael N. Kochert

01/05/2014

To: Gateway West Subcommittee co-chairs
Fr: Michael N. Kochert
Re: **Comments on the Gateway West Enhancement and Mitigation package.**

Thank you for the opportunity to attend your 17 December 2013 meeting on the Gateway West transmission line and to hear the presentation describing the Enhancement and Mitigation plan for the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). This message is a follow-up to my oral comments at the meeting.

As a matter of introduction, I have conducted and directed research and monitoring of raptors, prey, and vegetation in the NCA for nearly 45 years. I also studied colonization and use of the 500 kV PP&L (PacifiCorp) transmission line by raptors and ravens with agency and industry colleagues for 10 of those years.

My comments are as follows:

1. I commend Idaho Power and Rocky Mountain Power for the comprehensive package, and I commend the BLM Boise District and NCA staffs for their input to the effort.

2. The NCA was established by the U.S. Congress because the area contains an internationally unique aggregation of nesting raptors, and the legislation calls for protection and enhancement of the unique raptor nesting populations. Given that, most of my comments are predicated on the premise that major actions in the NCA need to consider the ultimate effect on the unique raptor resource.

3. Although the Enhancement and Mitigation package is quite comprehensive, a major deficiency of the package is that it lacks a monitoring component. Given that the package identifies a fairly substantial investment for many enhancement and mitigation actions, it is very important to evaluate the effectiveness of those actions. For example, I sensed at the meeting that there was not complete agreement on the predicted success rate of the habitat restoration efforts. As I stated at the meeting, I commend the parties involved for proposing to undertake such a challenging effort. However, given the extremely dry climate in the NCA in the recent past and predicted for the future, success of restoration efforts in the low precipitation zone in the Grand View and Bruneau areas could be extremely low. Even in decent precipitation years vegetation restoration in these areas could be a challenge. Given the uncertainty, I believe that restoration efforts should be monitored for effectiveness.

   I suggest that the Enhancement and Mitigation package provide for development of a comprehensive, peer reviewed monitoring plan. The monitoring efforts, if designed

properly, would provide the opportunity to for adaptive management experiments. The plan should identify the metrics for success. For example, will restoration success be a measure of vegetation in the restored areas or will it be prey composition and density, or reproductive performance of the nesting raptors?

4. Because construction of the transmission lines and the major proposed enhancement actions has the potential to ultimately affect the raptor populations, I believe it is incumbent to monitor the status of the major raptors in the area. I believe that colonization of the transmission line should be monitored much like it was done with establishment of the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993). The monitoring of the PP&L line provided valuable information to the utility, and it also identified the effect of the line on the raptor and raven population.

   It seems to me that the goal of the large-scale restoration efforts is to enhance the habitat and ultimately enhance or maintain the raptors. In my opinion, evaluating the effectiveness of large-scale restoration efforts without assessing raptor populations is falling short of completely evaluating the effectiveness of restoration efforts. A well-designed monitoring effort at the three main trophic levels would serve as a good adaptive management experiment for the restoration efforts.

5. I noticed that the Enhancement and Mitigation package did not mention or address raptors. I believe that that installation of nesting platforms can be an important enhancement and management effort. We found from our long-term research on the PP&L transmission line that the nesting platforms enhanced raptor nesting success (Steenhof et al. 1993). We also found that, when place properly, nesting platforms can attract raptors to nest below the conductors. For example, in all cases where Golden Eagles nested in towers with nesting platforms below the conductors, eagles nested in the platforms and in no other position of the tower. When planning for the 500-kV transmission line in the late 1970s, the PP&L (PacifiCorp) sought Morley Nelson's advice about placement of nesting platforms to enhance raptor nesting opportunities on the transmission line. During my work on the PP&L transmission line project I observed that PP&L personnel readily climbed to the nesting platforms located just above the waist below the conductors and performed work in the nest without the need to shut down the transmission line.

6. I have no problems with the proposal to removal of 8 miles of existing 46-kV transmission line between Bowmont and Gage substations. However, I suggest that IPC leave the existing poles and cross arms to reduce the cost of removal and to provide nesting and perching opportunities for raptors.

7. Several miles of 3-phase, cross arm distribution and transmission lines exist in the NCA, and electrocution of raptors has been reported on these power lines (Lehman and Barrett 2002). In my opinion, a positive enhancement effort would be to patrol untreated distribution and transmission lines for dead raptors and to retrofit any pole where an electrocution has occurred. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following procedures described in APLIC (2006).

Literature Cited

Avian Power Line Interaction Committee (APLIC). 2006. Suggested practices for raptor protection on power lines; The state of the art in 2006. Edison Electric Institute; Raptor Research Foundation, Washington, D.C. USA.

Lehman, R. N., and J. S. Barrett. 2002. Raptor electrocutions and associated fire hazards in the Snake River Birds of Prey National Conservation Area. Idaho Bureau of Land Management Technical.

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ATTACHMENT B

Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014

Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014

To: Bureau of Land Management Resource Advisory Committee Gateway West Subcommittee Co-Chairs

From: Golden Eagle Audubon Society

Re: Comments on the Gateway West Enhancement and Mitigation Portfolio, 1/10/2014

Thank you for this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We, the Board of Directors, write these comments on behalf of members of Golden Eagle Audubon Society (GEAS). GEAS constitutes some 1,500 members primarily residing in southwest Idaho. Our strategic focus is the conservation of birds, wildlife, and their habitats and promotion of wildlife appreciation by SW Idaho residents. Regarding the Gateway West Enhancement and Mitigation Portfolio, our primary concerns include the potentially highly inaccurate success estimate for restoration of native plant communities; the potential missed opportunities to enhance raptor nesting, perching and foraging opportunities; and the lack of a reliable monitoring strategy to track the value of proposed (and needed) enhancement and mitigation actions. GEAS would like to see the outcomes of this Enhancement and Mitigation Portfolio positively affect plants and wildlife, more specifically birds and bird habitat. The majority of our members live and bird watch in southwest Idaho and the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) is very dear to our membership. We propose actions that can lead directly to an overall enhancement of SRBOP for the betterment of raptors, other birds, other wildlife and their habitats, and to better enjoyment for the wildlife-loving public.

General Comments:

GEAS applauds Rocky Mountain Power and Idaho Power's (hereafter, 'the Companies') effort to work "in spirit of cooperation" to "meet enhancement requirements" (page 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, page 35).

The Portfolio indicates that the Enabling Legislation for SRBOP, Public Law 103-64, established the SRBOP in 1993 for the "…conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values…." Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area. Furthermore, it references the 2008 SRBOP Resource Management Plan (RMP) indicating: "the SRBOP is managed by BLM under the concept of dominant use rather than multiple use. This means that prior to authorizing uses,

BLM determines the compatibility of those uses with the purposes for which the NCA was established."

Based on the Public Law and the RMP, the Portfolio states (Page 33, Sect. 8.2) that, "locating utilities within these (designated) corridors is consistent with the RMP and with the enabling legislation for the SRBOP and therefore should require no additional enhancement to be consistent with the enabling legislation." GEAS does not agree with this position. Degradation to raptor habitat as a result of powerline construction is not consistent with enabling legislation. Enhancement therefore is a required act to mitigate for reduction and damage to raptor habitat, not simply an in-kind act "in the spirit of cooperation". Further, it is the Companies responsibility as a direct economic beneficiary of the line installation to ensure – for the long-term – that raptor habitat is not degraded as a result of the powerline. The Portfolio correctly cites the SRBOP RMP stating, "to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded (page 36)". Thus, to meet RMP objectives as well as operate in the spirit of cooperation, the Companies should be seeking to expand and inter-connect native vegetation in order to achieve objectives stated in the RMP.

GEAS contends that the Companies are in a positive economic situation right now as they have saved significant expenses by routing Sections 8 and 9 through SRBOP – a decision GEAS vocally supported with comments submitted during the Final Environment Impact Statement comment period. The Companies saved substantial dollars by using SRBOP because the route covers fewer miles, there is less need to compensate private landowners, and there are minimal new road construction costs. Funding the restoration approach we propose is not out of the realm for the Companies and is in the Companies best interests to demonstrate their social responsibility and sustainability highlighted in their business plans and reports.

Specific Comments and Recommendations

The most critical component to long-term stability of the world-renowned raptor populations of SRBOP is maintenance and enhancement of native vegetation communities that support diverse, abundant prey bases for the raptors. Therefore, GEAS provides comments that can lead to the direct actions necessary to achieve habitat restoration and enhancement goals.

GEAS proposes the use of an integrated and adaptive approach where restoration is applied. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseeding and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers

(2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understand before implementing a restoration plan in the SRBOP.

Cheatgrass presence complicates these efforts. The invasion of cheatgrass has changed the fire frequency in sagebrush systems such as the SRBOP where, prior to cheatgrass invasions, fire occurred on average every 70 years. Cheatgrass presence has accelerated fire return intervals to 5 to 7 years, a drastic change that has completely altered habitat in the SRBOP and makes remnant stands of native vegetation a vital element of the long-term health of SRBOP and its ability to support raptors. Thus it is critical to first protect remnant sagebrush patches using firebreaks (i.e., forage kochia) as proposed by the BLM fuels experts (L Okeson, pers. comm.). As restoration activities progress, firebreaks may be modified (i.e., replaced with native vegetation to connect restored areas and planted around the newly restored and connected patches) to help ensure protection from future fire.

Likewise, much effort has been expended on habitat enhancement in SRBOP, yet we know very little about what factors influence success and failure. GEAS proposes a restoration approach that is informed by ongoing research, designed to test and improve our knowledge as restoration is implemented, spatially explicit, and timed to appropriately capitalize on optimal weather conditions.

Ongoing restoration research carried out by the NCA Restoration Working Group is well suited to inform the Companies restoration efforts as they develop new techniques and understand the importance of seasonal and annual timing of implementation as a key factors influencing success (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.). The Work Group should be a key element of project planning and their published information and monitoring data should be employed as specific strategies are developed.

Restoration initiated through the Enhancement and Mitigation Portfolio should start with these data in hand. Initial restoration plots should be placed and planted so they build upon and improve the research data, and bridge to application at larger spatial extents. That is, plots should be placed in areas that will eventually connect remnant native vegetation patches and seeded/planted in a range of treatments the Work Group research shows have higher success probabilities. This approach is critical to prepare for the second, larger application: because the actual restoration implementation must be timed with optimal weather, this "learn-do" approach will increase the likelihood of success when full implementation occurs.

GEAS recommends that this restoration approach begin with the identification of the key remnant native sagebrush patches within the SRBOP that exhibit ecological integrity and are still "intact". These areas are the "base" for this type of approach. The second step would focus

restoration efforts in areas between these key remnant patches in an effort to connect these key areas together. The overall goal of this approach is to eventually create ecologically intact, large, and connected sagebrush areas important for the many species that thrive in these conditions.

The timing of restoration actions as specified above and success for restoration is dependent upon precipitation (large rain events) in the spring before restoration actions (planting, etc.) occur. It is imperative that restoration funds be flexible. Funds must be banked and allocated when the conditions are right for restoration actions. The restoration fund can be accessed when the conditions are prime for restoration actions. GEAS recommends the funding committed by the Companies be established as a Trust Fund which is managed by a Board or Oversight Committee. The Committee should have discretion to apply or reserve funding in a time-sensitive context (i.e., commit restoration funds in positive weather years). The Trust would serve a second function as a pot of 'matchable' dollars that could attract additional funds to augment restoration of SRBOPA.

As restoration actions occur, monitoring must be implemented to quantify and understand where and why success rates are high, address challenges and failures, and allow for adapting the restoration approach over the years so that the dollars spent on restoration will be successful over the long-term. The Portfolio fails to specify a monitoring effort. This is an important aspect that must be addressed and is crucial to the success of this approach. If vegetation reestablishment is the goal, then appropriate vegetation monitoring protocols must be put in place with data collected both before and after construction on the line, within the key remnant sagebrush patches, and at sites designated for restoration and mitigation.

Monitoring needs to be carefully considered and matched to expected outcomes temporally and ecologically. For example, restoration actions over a relatively small proportion of SRBOP are not likely to have measurable effects on, for example, prairie falcon populations across the entire SRBOP. It may, however, have some influence on nest success or breeding density of proximal nesting territories. Likewise, demographic response by prairie falcons may lag habitat recovery by several years. These examples illustrate the need for a thoughtful monitoring approach that begins with fine-resolution, vegetation monitoring and eventually scales to measuring the response by raptors that are most likely to be influenced by the restoration. The monitoring strategy should be implemented using an experimental design, where "control areas" and "experimental areas" are monitored so that comparisons can be made to determine successes, address failures, and inform late stage and future restoration actions accordingly. Again, this monitoring effort is critical to the adaptive restoration process and is required by BLM regulations.

GEAS proposes action on an overall approach that meets the enabling legislation and RMP guidance, employs the best science while engaging the fuels expertise at BLM, and sets the stage

for a more programmatic approach to habitat recovery in the SRBOP. Coordination between BLM land managers and ecologists, the Companies' natural resource and administrative specialists, and the NCA Restoration Working Group is critical to implement this approach. GEAS is committed to this collaborative, adaptive approach and pledges continued participation where appropriate.

Additional Comments on Enhancement and Mitigation

Recreational Shooting

Although not directly addressed in the Portfolio, GEAS members are strongly in favor of a shooting closure within 200 yards of new and existing powerlines as well as access roads. A shooting closure is consistent with and supports a range of recommendations and offerings in the Portfolio. For example, the Portfolio indicates that, "access roads … may increase the risk of vandalism … (page 32)." A shooting ban of 200 yards from roads and powerlines would be enforceable (consistent with Law Enforcement provisions, page 37) and discourage both firearm-caused vandalism and additive mortality to raptors and prey. Furthermore, we contend that one of the greatest threats shooting brings to the SRBOP is the potential for fire ignition. There are numerous incidents of target-shooting-related fire ignitions in southwest Idaho, some of which sparked immense, destructive blazes. Wildfire is a recognized threat to native vegetation (and consequently small mammals and raptors) in the SRBOP and an economic threat to the powerlines. A shooting ban would reduce all of these threats and, when paired with increased law enforcement, is completely enforceable.

Vegetation Restoration (reclamation)

Regarding plant/seed mixtures: Page 36 states "mixes should include shrubs that are suitable for small mammals." *While we don't argue with this intent, we expect that shrubs and forbs planted and seeded need to be a close match to the local soil and climate conditions… i.e., native plants. It's important this is clearly stated.*

Regarding the need for better (more accurate and precise) maps of proposed restoration: I.e., "… developing a geodatabase layer using the proposed facility locations and then overlaying that "footprint" database, whether for construction or operation footprint, with the relevant vegetation or land ownership geodatabase layer." GEAS recommends the restoration effort be fully informed with highly accurate spatial data and planning. SRBOP is one of the best-mapped areas in Idaho with a long history of spatial data. In preparation for spatial planning, the best available data on historic restoration activity and restoration research should be overlaid with topography, soils, fire perimeter and other GIS layers to ensure proper construction sighting, mitigation siting and restoration actions.

Page 36: "in accordance with the RMP, habitat restoration projects should be located in areas where it is most beneficial to raptor prey populations" therefore a spatial component to the restoration exercise is essential.

Need 'security' fund for fire response on top of management; page 32 cites a concern that "access roads … may increase risk of vandalism, weed infestation, litter, etc." We feel that the increased risk of fire ignition is the most critical threat posed by increased access. Some 80% of fire ignitions in the NCA are human-caused (L. Okeson, pers. comm.). We agree, that access also means quicker response to fire ignition but we also know that fires expand rapidly. Therefore we suggest a dedicated effort to sign the areas regarding risks and costs of wildfire and a proactive effort to deter ignitions (including a firearm ban).

Raptor nest/perch augmentation

Proactive retrofitting is an important element especially to honor the intent of the NCA as a world-renown site for Birds of Prey (NCA not an end unto itself … they are identified and situated for specific resource functions; SRBOP specifically designated for raptors, use for other purposes must be compatible with enhancements for BOP). GEAS recommends retrofitting existing structures where appropriate to enhance nest and perch sites for raptors.

Leave structures on removed lines

Page 39 and 40, referring to removal of Swan Falls to Bowmont line and Mountain Home to Bennet line: GEAS recommend the Companies do not remove structures that are suitable for raptor and raven nest and perches. We recognize there may be safety considerations but recommend that all structures that are not deemed unsafe be left. In addition to opportunities for raptors and ravens, many cavity nesting (excavators and secondary) will benefit from the nest site opportunities. Furthermore, a wide variety of birds would benefit for the elevated perch opportunities.

We recommend that cost savings of structure removal be redirected to (1) decommissioning and restoration of the service roads for these lines (thus improving and protecting slickspot peppergrass habitat), and (2) enhancements on the primary lines.

GEAS recommends the Enhancement Portfolio reference using 'state of the art' guidelines to add desirable nest opportunities.

Monitoring

As stated above, monitoring needs to be a specific element of the Portfolio. GEAS recommends that the Portfolio references the BLM Assessment Inventory and Monitoring program and any local (i.e., NCA specific) monitoring protocols and specifically describes the need for targeted monitoring of vegetation response to restoration, small mammal population trend, and raptor response to nest and perch enhancement. Monitoring is best conducted under an experimental design so trials inform subsequent efforts and expenditures.

Vegetation

Page 36: … "to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded." Monitoring of upland native shrub is critical to measure success of restoration actions.

Prey base

Page 36: Citing the SRBOP RMP: the greatest benefit to raptors is in the stabilization of the prey base" thus no amount of restoration nor reclamation will meet RMP standards unless the prey base responds and the only way to accurately test this is through monitoring of the prey populations themselves.

Raptors

Monitoring protocols should be put in place to understand the effects of the line and help target measures to address any negative impacts through further management action. Ultimately enhancement measures should improve or at least maintain current population numbers in the area.

Again, Golden Eagle Audubon Society Board of Directors appreciates this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We look forward to further engagement in successful siting of the Gateway West line in SRBOP and in successfully enhancing native vegetation, small mammal, and raptor communities in southwest Idaho.

On behalf of the Golden Eagle Audubon Society Board of Directors,

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ATTACHMENT C

Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA

Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA

Staff from the BLM Boise District and the US Geological Survey (USGS) Forest and Rangeland Ecosystem Science Center (FRESC) planned and implemented a workshop in June 2008 to form a strategy to monitor raptors in the NCA (USDI 2008). The workshop included 37 scientists, specialists, and managers met to "develop an adaptive management framework for raptor monitoring for the NCA to include regular long-term monitoring to assess raptor status, and monitoring related to specific management or projects."

Objectives of the workshop were to:

1. prioritize raptor species for long-term monitoring,
2. recommend efficient wildlife monitoring designs to assess the conservation and enhancement of raptor populations and habitats in the NCA, and
3. propose how raptor (and/or other species) monitoring can be used to evaluate vegetation treatment projects implemented in the NCA

This attachment summarizes findings and recommendations of the workshop group that addressed monitoring raptor status and trends in the NCA. A full report of the workshop is presented in USDI (2008). Workshop participants recommended that monitoring should be designed to detect change and prompt a management decision if change exceeds an acceptable standard or pre-determined threshold. In general, upon detecting an unacceptable change or trend, additional investigation(s) should be conducted to gain more detailed understanding of cause-effect relationships, mechanisms, etc.

RESPONSE OF WORKSHOP PARTICIPANTS TO THE QUESTIONS:

Because questions 1 and 2 are interrelated, both questions were addressed simultaneously in discussing the approaches for the different species.

Question 1. Which raptor species warrant intensive long-term monitoring and what monitoring designs are effective for assessing the status of these species, as well as generate information on the other raptor species?

Question 2. How often should various raptors be surveyed and what should be the periodicity of monitoring

The report recommended a 2-tiered approach for monitoring raptors that included intensive monitoring for priority species and a less intensive strategy for multiple species. Workshop participants identified Golden Eagles, Prairie Falcons, Ferruginous Hawks, and Burrowing

Owls as priority species with the eagles and falcons as the top priority. The less intensive strategy would focus on the benchland and wintering raptors. Benchland nesting raptor species, specifically included Burrowing Owl, Ferruginous Hawk, Northern Harrier, and Short-eared Owl. *The term "benchland" referrers to the plain surrounding the Snake River Canyon (USDI 1996:9).* Wintering raptor species, specifically Rough-legged Hawk, Northern Harrier, Red- tailed Hawk, Golden Eagle, and Prairie Falcon.

Golden Eagles and Prairie Falcons were considered top priority because:

- These species were cornerstones in establishing the NCA
- A vast background data has been collected on them from which to detect change (40+ years for Golden Eagles and periodically over 30 years for Prairie Falcons).
- They utilize different prey that vary over time, and eagle and falcon populations fluctuate differently based on previous research
- The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and jackrabbit status is associated with shrub habitat condition.
- The Prairie Falcon is a ground squirrel specialist during the breeding season and is sensitive to changes in ground squirrel abundance as a result of climate change and habitat alteration.
- Most Prairie Falcons leave the NCA following ground squirrel estivation, and factors affecting falcons can extend beyond the NCA. Trends in numbers may reflect conditions on and off the NCA, and migratory species, such as Prairie Falcons, may be affected more by climate change than resident species.
- The NCA contains a low number of nesting eagle pairs, and loss of a few nesting pairs should trigger new action by managers.
- Historical counts of falcon pairs have revealed high year-to-year variability
- Analyses of change can be across the NCA or more locally.
- Nesting eagles are relatively inexpensive to monitor compared with data gained.
- Surveyors can effectively gather other data (e.g., covariates).
- The NCA is one of the few places where Prairie Falcons have been studied and monitored in the long-term.
- Prairie Falcons have large home ranges that encompass much of the area within the NCA
- The Golden Eagle is a FWS Bird of Conservation Concern in BCRs 9 (where the NCA lies), 16, 17, 18 & 35, and the FWS is interested in eagle monitoring in the NCA.
- The Prairie Falcon is a FWS Bird of Conservation Concern in BCRs 9, 10, 16, 17, 18 and 32, which comprise the bulk of its range in the U.S.
- The number of Golden Eagles using the NCA approximately doubles in winter with influx from other areas

Ferruginous Hawks and Burrowing Owls were considered priority species because:

- These species nest on the benchlands above the canyon, although Ferruginous Hawks also nest in the canyon.
- They use different vegetation types and prey than Golden Eagles and Prairie Falcons.
- Ferruginous Hawks use shrub and grassland habitats.
- Burrowing Owls use grassland cover types, and owl abundance, distribution, and use of areas is likely to change if shrubland restoration succeeds.
- Preliminary data show no evidence for declines in the Ferruginous Hawk nesting population in the NCA (see Appendix 4). Monitoring would provide for a solid baseline and continued assessment of status
- The Ferruginous Hawk is a FWS Bird of Conservation Concern and BLM Sensitive Species Type 3
- The Burrowing Owl is a FWS Bird of Conservation Concern throughout most of its U.S. range (BCRs 9, 11, 16, 17, 18, 32, 33, 35, 36) and is a BLM Sensitive Species Type 5

Recommended Monitoring for Priority Species

Golden Eagles. Workshop participants recommended that the annual survey of all historical nesting territories in the NCA and in the Comparison Area (the area along the Snake River located upstream and downstream of the NCA) continue as it has for the last 40 years. The annual survey includes assessment of occupancy and productivity.

The quantitative goal of monitoring depends on the location of decline in the NCA and whether it is geographically local or widespread. The goal is to detect change (rate of change or change below an established threshold) in the number of pairs and/or productivity. Participants suggested a loss of 3-4 nesting pairs as a threshold that would trigger action

Management actions: An unacceptable change would trigger a decision to investigate what factors (e.g., fire, OHV and other human disturbance, restored vegetation, etc.,) might be associated with the change in nesting pairs or productivity, relative to the location of the change. Investigations and management actions should consider the time frame for recovery. Eagles are long-lived, which could result in a long time for recovery. The BLM should focus vegetation restoration efforts within 3 km of the canyon rim, or within 3 km of nests outside of the canyon.

Threats to Golden Eagles include vegetation type conversion from shrubs to annual grasses, and human activities - recreation (mainly OHV disturbance). [NOTE: *Abandonment equals take if caused by human activity...Diana Whittington (US FWS) stated that human disturbance to nesting Golden eagles (or the permitting of such) that causes loss of any production in a given year is a violation of the Bald/Golden Eagle Act.*]

Prairie Falcons. The group recommended monitoring falcon abundance and nesting success 3 of every 5 years. One year to consist of a full canyon survey as was done in 2002, and the other 2 years to consist of a stratified random sample of sections of canyon with high and low nesting densities as was done in 2003.

Information from assessing annual nesting success could be adequate to monitor Prairie Falcon reproduction in the NCA because nesting success [the proportion of preselected pairs raising at least one young to ≥30 days of age (see Steenhof and Newton 2007)] and productivity (mean number of young reaching ≥30 days of age per preselected pair) are highly correlated. It cost about $120,000 to conduct a full canyon survey and collect productivity data in 2002. Using the cost of a full canyon survey with productivity as a base, a full canyon survey with just nesting success would reduce the base cost about 15% and a stratified random sampling effort like that used in 2003 combined with only assessing success would reduce the cost by about 35%. Information on other species (i.e., Red-tailed Hawk and Ferruginous Hawk) also can be collected from the Prairie Falcon point-count surveys.

Participants recommended that the quantitative goals of monitoring be to 1) identify trajectories in the number of nesting pairs and/or nesting success occurring over multiple years in a geographic cluster within the survey area, 2) detect substantial changes in the number of nesting pairs and/or nesting success across larger areas (*substantial change was not defined at the workshop*), and 3) ascertain when the number of pairs falls below the historical minimum of 160 recorded in 1994. Some members of the group cautioned about using absolute thresholds. These levels should serve as triggers for further investigation not as triggers for panic.

Management actions: A decline in the number pairs or nesting success beyond the acceptable level would trigger a management decision to investigate the reasons for the decline. The 1997 survey was a good example of this management process. Results from long-term surveys in selected stretches of the canyon in 1997 indicated a significant decline in the number of falcon pairs. NCA management implemented a full canyon survey in 2002, and results indicated that the number of nesting pairs that year was back at historical high levels.

Recommendations for less intensive monitoring for multiple species

Raptors that nest on the benchlands. Workshop participants recommended that monitoring focus on:

- Burrowing Owls
- Ferruginous Hawks
- Northern Harriers
- Short-eared Owls.

The Burrowing Owl should be a focal species for the ecological communities on the benchlands. Short-eared Owls and Northern Harriers can be nomadic, and numbers vary widely from year to year in the NCA, which is an important consideration for the monitoring design. Year to year changes in local numbers are likely to reflect nomadism as much as they reflect population changes. The Short-eared Owl is a FWS Bird of Conservation Concern and a BLM Sensitive Species (type 5). Swainson's Hawk were not a great concern in the NCA because of low number of pairs.

Recommended monitoring approach: The standardized roadside point-count survey method described in Conway et al. (2008) and Conway and Simon (2003) was recommended for surveying Burrowing Owls and the other species. Routes should be established with some structured sampling frame. Conway and Simon (2003) recommend one route per township. Participants recommended using the existing road network for transects and broadcast surveys for Burrowing Owls and the other species where applicable. When pairs are located, surveyors can search the area of activity to find a nest and assess productivity or nesting success.

Workshop participants recommended that the use of transects for multiple species should be examined further to address the following:

- whether transects should be surveyed year round.
- what information would be collected from the transects–trend over time?
- how nesting success can be assessed from transects.
- what changes can be detected to trigger a management decision?

Wintering raptors. The following species were identified for monitoring on the benchlands:

- Rough-legged Hawk,
- Northern Harrier
- Red-tailed Hawk
- Golden Eagle
- Prairie Falcon

Some participants felt that a measure of raptor use would be a good indicator of restoration success. [*There were differing opinions on this statement. Some Group I participants and Group III (see Statement 1 of Question 2 of Group III) did not agree with the statement, and Group II felt that the approach should be evaluated (see recommendation 4, Question 1)].*

Data from past studies should be evaluated to assess if comparisons can be made with new survey data. John Doremus collected wintering data on certain species. Bill Mattox and James McKinley surveyed road transects from 1998 to 2005 that included all raptor species detected in the Orchard Training Area within the NCA. Also Watson et al. (1996) recorded raptor

species occurrence collected from randomly distributed point counts during the BLM/IDARNG Research Project

Recommended monitoring approach: Participants believed that point-count surveys could be conducted from randomly dispersed points or points along transects. The group recommended use of the roadside point-count survey method. A monitoring plan should consider surveying year-round benchlands road transects during the two years in five when Prairie Falcon monitoring is not being done (see Prairie Falcons 2,a above). [*Note: the recommended periodicity (number of times in a year) of the surveys was not discussed at the workshop and will be addressed in the NCA monitoring plan*]. Workshop participants recommended that surveyors collect other data (e.g., weather, habitat, land use, etc.) as covariates to detect factors influencing birds. The specific covariates will be identified in the planning process. Also the monitoring design should consider stratified random sampling based on management needs.

General Discussion. Some participants suggested the BLM identify and monitor raptor migration corridors in NCA. Also, some asked if we are comfortable with our knowledge of status and our estimates for raptors in NCA (excluding Prairie Falcons and Golden Eagles). Also should the BLM consider a comprehensive assessment / inventory as a basis for monitoring the status of species and their response to management activities?

Question 3. Which raptor species provide the most reliable data to evaluate long-term (i.e., 20 years) habitat restoration success across the NCA?

Golden Eagles and Prairie Falcons were listed because these two species have different primary prey species that are associated with shrubland habitats. Black-tailed jackrabbits (the eagle's main prey) require shrubs. Although Piute ground squirrels (the falcon's main prey) do not require shrubs, their populations are more stable in shrub habitats. Eagles have a relatively small home range compared to the falcon's large home range, which provides managers with a reflection of impacts at different scales and locations. The Golden Eagle population is relatively stable vs. Prairie Falcon's variability in occupancy/productivity.
Raptor use of restored areas vs. untreated areas needs to be assessed, but the challenge is how to do it. Some participants suggested using solar powered GPS satellite-received transmitters on female Prairie Falcons to assess use of treated and untreated areas. *Note: Some participants felt that data from males might be more revealing if transmitters of the appropriate size are available.* Participants recommended that treatment and control experiments should be monitored before, during, and after treatments.

RESEARCH QUESTIONS

The group suggested that protocols be established to assess the array of research questions so that studies can complement each other. Participants identified the following research questions:

- Why are some Golden Eagle territories that have burned more productive than others? (Diet studies may be one way to approach this question.)
- What is the trade-off of using non-natives in vegetation restoration vs. no action?
- Can Loggerhead Shrikes be used as an indicator of restoration success?

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FRAMEWORK FOR MITIGATION OF IMPACTS FROM INFRASTRUCTURE PROJECTS ON SAGE-GROUSE AND THEIR HABITATS

Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse State Advisory Committee

December 6, 2010

INTRODUCTION

The Conservation Plan for Greater Sage-grouse in Idaho (Idaho Sage-Grouse Advisory Committee 2006; as amended in 2009) calls for the development of a "proposal for a mitigation and crediting program for sagebrush steppe habitats in Idaho and recommendations for policy consideration" (Measure 6.2.4.). In early 2010, the Idaho Sage-grouse Advisory Committee (SAC) established the Mitigation Subcommittee to complete this task.[1] The Mitigation Subcommittee met several times from the late spring, through the fall of 2010 and found broad areas of agreement among its diverse participants.

This report presents the Mitigation Subcommittee's consensus recommendations for the creation of an Idaho-based program to compensate for the impacts of infrastructure projects on sage-grouse and their habitats. This program – called the Mitigation Framework – would serve as a science-based "mitigation module" that project developers and government regulators could use to achieve compensatory mitigation objectives called for in project plans and permits. While compensatory mitigation may help offset certain impacts arising from infrastructure projects, mitigation should not be considered a substitute for first avoiding and then minimizing impacts. In addition, it is important to recognize that federal and state regulatory or land-management agencies, and county or local governments may also require additional stipulations, conditions of approval or other requirements as well as on-site mitigation, in accordance with applicable law, regulation or policy.

This document proposes a general outline or "skeleton" of policies and procedures for such a program. The Mitigation Framework is designed to be transparent, inclusive, and accountable to defined objectives. The Subcommittee's purpose is to describe the program in enough detail to foster a dialogue among SAC members, spot important issues and points of agreement, and assess the level of support for developing a functioning mitigation program for Idaho sage-grouse and their habitats.

[1] Subcommittee participants: John Robison and Lara Rozzelle, Idaho Conservation League; Brett Dumas, Idaho Power Company; Paul Makela and Tom Rinkes, BLM; Don Kemner, Idaho Department of Fish and Game; Will Whelan and Trish Klahr, The Nature Conservancy; Rich Rayhill, Ridgeline Energy, LLC; Lisa LaBolle and Kirsten Sikes, Idaho Office of Energy Resources; Nate Fisher, Idaho Office of Species Conservation; John Romero, Citizen at Large.

EXECUTIVE SUMMARY

The state of Idaho is seeing an increasing number of infrastructure projects, such as transmission lines and wind energy facilities, proposed in the state's sagebrush steppe ecosystems. Where federal permits are required, the environmental review process for these projects will analyze how these projects affect sage-grouse and will consider a range of potential mitigation measures to avoid, minimize, or offset any impacts. It is likely that the environmental review process will lead at least some developers and agencies to implement compensatory mitigation.

Compensatory mitigation consists of compensating for residual project impacts that are not avoided or minimized by providing substitute resources or habitats, often at a different location than the project area. For sage-grouse, this would include, among other things, protecting and restoring sagebrush habitats to offset habitat losses and other effects of infrastructure projects.

This framework describes the general outline for a sage-grouse compensatory mitigation program in Idaho. This program would employ an "in-lieu fee" approach to compensatory mitigation through which a project developer would pay funds into an account managed by the mitigation program for performance of mitigation actions that provide measureable benefits for sage-grouse and their habitats within Idaho.

The Mitigation Framework does not alter the legal standards or procedures for review and approval of infrastructure projects. Rather, it offers an option that project developers and/or regulators may choose for implementing mitigation plans and agency permit conditions. It should be emphasized that this program would not relieve project developers and permitting agencies of their obligation to avoid and minimize environmental impacts through appropriate project siting, design and implementation.

Although the initial focus is on sage-grouse, the Mitigation Framework can be readily adapted to provide compensatory mitigation for other sagebrush obligate and associated species. The suitability of the Framework for other species and natural features has not been evaluated.

The objectives of the Mitigation Framework include:

- Provide a credible, efficient, transparent, and flexible mechanism to implement compensatory mitigation;
- Ensure that sage-grouse impacts are offset by actions that benefit the affected species and habitats;
- Provide increased certainty for developers and agencies;
- Involve private and public partners in crafting solutions;
- Provide developers the opportunity to offset the impacts of project development and operation on sage-grouse and sage-grouse habitat, and provide a consistent mechanism to offset impacts to the species that can be evaluated in future reviews of the species' status; and

- Evaluate issues based on best available scientific information, while acknowledging and responding to scientific uncertainty.

The Mitigation Framework would be established through a memorandum of agreement (MOA) among entities that have the capacity and commitment to assist in its implementation. Such parties may include land and wildlife management agencies, counties, tribes, participating private infrastructure development companies, and non-governmental organizations. The MOA would define the specific roles and responsibilities, procedures, and tasks needed to operate an Idaho-based compensatory mitigation program.

The Mitigation Framework envisions a program with the following attributes: (1) a Mitigation Team and program administrator to steer the mitigation program and ensure strong oversight; (2) technically sound and transparent guidelines for estimating compensatory mitigation costs; (3) a science-based statewide strategy to guide the selection of mitigation actions that will receive funding; (4) provisions that the costs of operating the program will be borne by infrastructure developers that use the Mitigation Framework to deliver compensatory mitigation; (5) monitoring the implementation and effectiveness of mitigation actions funded by the Mitigation Framework program; (6) a system to track benefits provided by the Mitigation Framework to sage-grouse habitat in Idaho; and (7) periodic evaluation and adaptation of the Mitigation Framework program.

This framework provides only a general outline of a proposed Idaho-based compensatory mitigation program. It is intended to assess the level of support for crafting the agreements and completing the technical tasks needed to bring the Mitigation Framework into being.

DISCUSSION

I. The Role of Compensatory Mitigation in Infrastructure Development and Sage-grouse Conservation

A. Mitigation Basics

Broadly defined, "mitigation" refers to a wide range of measures that are taken to avoid, minimize, rectify, reduce, or compensate for the adverse impacts of actions affecting the environment. *See* 40 C.F.R. § 1508.20 (definition of "mitigation" in National Environmental Policy Act (NEPA) rules). In this general sense, mitigation should be an integral part of all phases of project planning and implementation.

The focus of this report is on compensatory mitigation – also known as "biodiversity offsets" or "offsite mitigation." Compensatory mitigation consists of compensating for residual project impacts that are not avoided or minimized by providing substitute resources or habitats, often at a different location than the project area. For instance, a project developer may fund the restoration of a particular type of habitat in order to replace or "offset" similar habitat that is lost as a result of project construction.

This Framework adopts an "in-lieu fee" approach to compensatory mitigation. Under this approach, a project developer provides funding to a compensatory mitigation program administrator who then distributes the funds to the appropriate government agency, foundation or other organization for performance of mitigation actions. In an in-lieu fee program, the responsibility for actually delivering the compensatory mitigation is transferred from the developer to the program administrator once the developer provides the necessary funds to the in-lieu fee program.

It is important to emphasize that compensatory mitigation does not relieve project developers and permitting agencies of their obligation to avoid and minimize environmental impacts. This Framework endorses the principle known as the "mitigation hierarchy," which holds that decision makers should consider the elements of environmental mitigation in the following order of priority:

1. Avoid environmental impacts through project siting and design;

2. Minimize the impacts during construction, operation. maintenance, and decommissioning by implementing appropriate conservation measures related to timing and conduct of project activities;

3. Restore areas that have been disturbed or otherwise rectify on-site project-related impacts to the greatest extent practicable; and

4. Compensate for residual impacts (direct and indirect effects that are not mitigated on-site) by providing replacement habitats or other benefits.

This means that compensatory mitigation is addressed only after efforts to avoid, minimize, and mitigate the impacts have been addressed. It also should be noted that significant impacts to habitat areas that support special functions and values for sage-grouse may simply not be replaceable through mitigation and therefore the best course may be to avoid those areas altogether.

B. Need for an Idaho Compensatory Mitigation Program

In recent years, the state of Idaho has seen an increase in the number of major infrastructure projects proposed in the state's sagebrush steppe ecosystems. Several current proposals involve high voltage transmission lines that would cross over hundreds of miles of sage-grouse habitat. Large scale energy infrastructure projects such as wind farms may also affect large areas of sage-grouse habitat.

Where these projects are located at least partially on federally managed public lands they will be required by federal law to go through an extensive environmental review process under NEPA before relevant federal permits are issued. The NEPA process requires the permitting agencies to consider the projects' environmental effects (both positive and negative), alternatives, and potential mitigation measures. Impacts on sage-grouse will be one of the topics analyzed in the NEPA process.

Even after efforts are taken to avoid and minimize impacts, it is possible that some of these infrastructure projects will degrade some sage-grouse habitat, cause direct sage-grouse mortality, or lead to indirect effects such as avoidance of previously occupied habitat. The extent to which project developers and regulators adopt compensatory mitigation as a means to offset these impacts is not fully known. However, it is likely that at least some developers and regulators will seek to implement compensatory mitigation to benefit sage-grouse and their habitats.

Energy companies and other developers face daunting challenges in carrying out compensatory mitigation for sage-grouse habitat. Just identifying specific mitigation actions requires a major effort. Actually implementing sagebrush restoration and enhancement projects is even more difficult and expensive – typically involving years of effort and a significant risk of failure. Delivering this type of technically complex environmental mitigation may be well outside the core business of many infrastructure developers.

C. Advantages of the Mitigation Framework

The Mitigation Framework proposes to respond to these challenges by creating a statewide program to deliver scientifically sound compensatory mitigation for multiple projects. Project developers and regulators would no longer have to design, fund and implement their own mitigation programs. Instead, they would have the option of contributing money to a central fund overseen by agencies with expertise in habitat management and non-governmental partners with similar experience.

This approach to compensatory mitigation offers three major advantages. The first advantage stems from the increased efficiency of an Idaho-wide mitigation program compared with fragmented, project-by-project mitigation programs. Mitigation efforts require a significant investment in planning, administration, project oversight, and monitoring. The Mitigation Framework would consolidate these functions, thus avoiding needless duplication.

The second advantage is that a state mitigation fund can be used for sage-grouse conservation more strategically and at a greater scale than project-by-project mitigation. As described in more detail below, the Mitigation Framework would fund sage-grouse habitat protection and restoration projects in accordance with a statewide strategy that uses landscape-scale analyses to identify the specific measures and habitats that will provide the greatest benefit for Idaho sage-grouse populations. This Idaho-based mitigation strategy will be integrated with other conservation strategies throughout the range of sage-grouse to ensure that actions taken in Idaho benefit the species as a whole.

Third, this method can engage the capacity and competence of natural resources agencies, local governments, private companies, and non-governmental organizations. The Mitigation Framework proposes to enlist these entities in shaping Idaho's strategy, developing criteria for use of the fund, and proposing and implementing habitat protection and restoration projects.

The benefits of the Mitigation Framework can be summarized as follows:

Benefits for Project Developers:

An efficient and reliable mechanism for meeting compensatory mitigation objectives and permit conditions; and

Increased certainty regarding project costs.

Benefits for Regulatory Agencies:

Increased certainty that in-lieu fees will result in strategic "on-the-ground" mitigation actions that benefit sage-grouse.

Benefits for Sage-Grouse:

Increased certainty that scientifically sound mitigation actions that benefit sage-grouse and offset impacts and habitat losses associated with infrastructure development will be implemented.

D. Ensuring Accountability

In-lieu fee compensatory mitigation does pose one potentially significant drawback that must be acknowledged and addressed: a poorly designed program may lack accountability for delivering meaningful on-the-ground benefits for sage-grouse. Simply having a project developer contribute to an in-lieu fee mitigation account does not by itself compensate for the sage-grouse impacts caused by the project. Actual mitigation is possible only after well-conceived habitat protection and restoration projects are planned, funded, implemented, monitored, and successful in achieving stated objectives.

The Mitigation Framework seeks to ensure accountability by adopting a series of rigorous and transparent procedures. As described below, the Framework would: (1) ensure that program administration and monitoring functions are adequately funded; (2) provide technically sound guidelines for estimating the costs of delivering compensatory mitigation; (3) establish a science-based statewide strategy to guide the program; (4) develop project selection criteria and a request for proposals based on the strategy; (5) require monitoring of the implementation and effectiveness of mitigation actions funded by the program; (6) track benefits the Mitigation Framework program provides to sage-grouse in Idaho; and (7) require periodic evaluation of the program. Taken together, these procedures provide a high degree of certainty that the Mitigation Framework will be able to turn in-lieu fee payments into tangible, lasting compensatory mitigation for sage-grouse.

As described in greater detail in Section E, below, project developers that seek to use the Mitigation Framework will need to show two things. First, they will need to show that their projects' impacts on sage-grouse and their habitats have been evaluated using a scientifically sound process. Second, they will need to show that their contributions to the mitigation fund reflect the Mitigation Framework's compensation guidelines to ensure that funding will be adequate to offset project impacts. Having demonstrated those things, the project developers should then be able to rely on their in-lieu fee contribution to the mitigation account as satisfying their compensatory mitigation objectives or obligations.

II. Core Elements of Idaho Sage-Grouse Mitigation Program

A. Program Objectives

- Provide a credible, efficient, transparent, and flexible mechanism to implement compensatory mitigation;
- Ensure that sage-grouse impacts are offset by mitigation actions that benefit the sage-grouse and their habitats;
- Provide increased certainty for developers and agencies;
- Involve private and public partners in crafting solutions;
- Provide developers the opportunity to offset project impacts on sage-grouse and sage-grouse habitat, and provide a consistent mitigation mechanism that can be evaluated in future reviews of the species' status; and
- Evaluate issues based on best available scientific information while acknowledging and responding to scientific uncertainty.

B. Scope

The Mitigation Framework proposes to mitigate for impacts to Idaho sage-grouse and their habitats in Idaho.

The initial focus of the Mitigation Framework is on sage-grouse. However, this program can be readily adapted to provide compensatory mitigation for other sagebrush obligate and associate species, such as pygmy rabbits, if project developers and regulators call for such mitigation. Whether this Framework is suited for mitigation of impacts to a broader suite of species or natural features has not been evaluated. It should be noted that some subcommittee members expect to advocate in other forums that compensatory mitigation should extend beyond sage-grouse.

The Mitigation Framework focuses on infrastructure projects because this type of development is the most likely to give rise to compensatory mitigation under existing environmental policies. As used here, the term "infrastructure" refers to building structures that significantly disturb sage-grouse habitat, including but not limited to projects for electricity transmission, energy generation, pipeline conveyance, transportation, communications, and similar purposes.

The Mitigation Framework is not intended to apply to existing projects that are not changing in scope or to the renewal of on-going activities, such as grazing permits. In addition, the Framework is not suited to projects with minor impacts because their contributions to the mitigation program would be too small to justify the effort needed to establish and administer in-lieu fee payments.

C. Integration with Environmental Review Procedures

The Mitigation Framework does not alter the legal standards or procedures for review and approval of infrastructure projects. Rather, the Framework offers an option that project developers and/or regulators may choose for implementing mitigation plans and agency permit conditions.

The Mitigation Framework is intended to complement the environmental review process conducted pursuant to NEPA and other federal environmental laws as well as county land use planning authorities.

Many energy and other infrastructure projects undergo review and approval at the county level. The issues examined and the level of environmental analysis varies widely among individual counties and individual developers. If a county or developer decides to address sage-grouse impacts, it will be able to use the Mitigation Framework as a mechanism for meeting compensatory mitigation objectives that may arise from the county permitting process.

D. Mitigation Strategy

The next step focuses on the Mitigation Team's task of developing a statewide, science-based strategy that will guide the use of the mitigation fund.

The mitigation program strategy would establish priorities for the use of compensatory mitigation funding based on factors/risks identified in the U.S. Fish and Wildlife Service's 12-Month Findings for Petitions to List Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered (USFWS 2010) and in the Conservation Plan for Greater Sage-grouse in Idaho (2006). The strategy sets mitigation priorities with a landscape view of sage-grouse needs and highlights mitigation opportunities in Idaho based on best available science. In setting priorities, the strategy considers species and community size, landscape condition, and regional context. The strategy is responsive to the threats and risks described in the sage-grouse 12-month findings. The strategy will also generally describe the types of mitigation actions, project specifications, and best practices that are likely to produce measureable benefits for sage-grouse habitat. Finally, the strategy addresses both implementation and effectiveness monitoring requirements for mitigation actions funded through the program.

The Mitigation Framework's strategy will draw heavily from the State of Idaho's sage-grouse conservation plan but has a narrower focus. It is intended to provide the specific guidance on program priorities, accepted mitigation measures, and geographic areas of emphasis that potential mitigation project sponsors will need to know when they apply for funds. The strategy plays a crucial role in steering mitigation funding to those activities and places that can provide the most effective benefits for Idaho sage-grouse populations consistent with strategies to increase the viability of the species throughout its range.

To this end, the strategy will address one of the major policy questions that arise in the design of compensatory mitigation systems: how closely should the mitigation actions be linked to the type and location of the habitat that was originally affected by the infrastructure project. Stated in the alternative, does removal of the mitigation action from the area of impact improve the effectiveness of or benefit from the action. Some compensatory mitigation systems place a heavy emphasis on this link by favoring "in-kind" and "on-site" compensatory mitigation over

"out-of-kind" and "off-site" compensatory mitigation. The subcommittee members generally favor an approach that allows funding to flow to the projects and locations within Idaho that will provide the greatest overall positive impact on sage-grouse populations. The Mitigation Framework calls for a monitoring program that would assess habitat gains provided by mitigation actions and compare them with the mitigation objectives of the participating infrastructure projects. The nature and purpose of this monitoring is described more fully in Mitigation Program Step 4, below.

Once the strategy is complete, the Mitigation Team will develop project ranking criteria and procedures that will guide the selection of the mitigation actions that will receive funding. The goal is to fund projects that provide high quality, lasting benefits based on landscape scale analyses that actually compensate for project impacts.

E. Compensation Guidelines

The Mitigation Framework Program will develop guidelines that may be used by developers and/or regulators to determine the cost of meeting their compensatory mitigation objectives. These compensatory mitigation objectives determine the extent of compensatory mitigation for each project and are generally incorporated into project plans or permits.

The compensation guidelines will provide transparent, technically sound principles for determining how much it costs to deliver habitat mitigation for sage-grouse. In other words, the guidelines will represent best estimates of the true cost of implementing the mitigation actions needed to meet each project's compensatory mitigation objectives. The guidelines may be used by the project developer and the Mitigation Framework Program Administrator to establish the in-lieu fee that the developer will contribute to the mitigation fund.

Specific valuation methods will be developed at a later time and will likely draw from compensatory mitigation systems used elsewhere in the West. Although the details have yet to be worked out, the following outline illustrates the core concepts and principles (shown in bold lettering) that are likely to be employed by the MOA parties in setting the Mitigation Framework's in-lieu fee structure.

- A **common unit of measurement** would be established for describing and tracking both the project impacts and the benefits of any compensatory mitigation actions. This unit of measurement can be a physical unit such as "acres impacted" or more specifically "acres of summer brood rearing habitat impacted" or "habitat units" lost.

- While the "common unit of measurement" noted above addresses the area of habitat impacted and mitigated, **habitat compensation ratios** are used to address the **quality** of the habitat affected by the infrastructure project. These ratios could specify the number of acres of mitigation required per acre of impacted habitat based on the size, habitat quality/condition and function of the impacted habitat; for more critical or important habitat, more mitigation acres might be required. Thus, habitats with higher quality and importance could have higher compensation ratios.

- Several factors are taken into account in calculating how much it will cost to actually compensate for the acres or habitat units. The recommended approach is to evaluate on

the costs of implementing a conceptual **portfolio of potential mitigation actions** or offset activities that provide benefits for sage-grouse. This portfolio of model projects would include a balanced mix of accepted habitat protection and restoration measures reflecting the types of projects expected to be funded by the mitigation program (in accordance with the strategy discussed above). Examples of projects in this portfolio may include such actions as restoring sagebrush canopy and a native understory on recently burned land, improving riparian areas and wet meadows in early brood-rearing habitat, conservation easements to prevent habitat loss, and land management practices that improve sage-grouse habitat. Project costs include the full range of expenses needed to complete all phases of the mitigation action, including administration and monitoring. The average costs of these model mitigation actions per acre or habitat unit is the foundation of the in-lieu fee calculation.

- In addition, the in-lieu fee should also be adjusted to take into consideration the issue of **lag time** –the time between when habitat is lost at the impacted site relative to when habitat functions are gained at the compensation site.

- The fee also needs to account for **contingencies** associated with delivering compensatory mitigation, including an estimate of the **risk of failure** (i.e., the probability that offsite mitigation will not result in any measureable conservation outcomes) for each mitigation site or project.

- In addition to the fee calculated above, costs for establishing and operating the program, including travel, technical consultation and monitoring of program effectiveness must be included. This overhead fee could range from 5-15% depending on the size and complexity of the proposed mitigation program.

F. Program Structure and Oversight

The Mitigation Framework would be established through a memorandum of agreement (MOA) among the entities that would participate in its implementation. The MOA would define the specific roles and responsibilities, procedures, and tasks needed to operate an Idaho-based compensatory mitigation program. The MOA would serve as a joint powers agreement for state and local government parties.

The MOA would establish the following administrative structure for the Mitigation Framework:

1. **Core Team:** A core group would oversee the Mitigation Framework program and provide policy-level guidance for the Science Team and Fund Administrator, described below. The Core Team would be composed of three to seven representatives of diverse perspectives among the MOA signatories.

2. **Science Team:** A team of experts drawn from MOA signatories and other targeted organizations will administer the science-based and technical aspects of the program. The Science Team would consist of several individuals with expertise in relevant areas such as habitat protection and restoration, landscape ecology/spatial analysis, wildlife biology, sage-grouse ecology, project development, and mitigation policy.

The Team would focus on developing the policies and statewide strategy that will guide the program, making requests for mitigation project proposals (RFPs), ranking mitigation proposals that will receive funding, tracking monitoring reports and project benefits, and evaluating program success.

3. **Program Administrator:** A program administrator will be responsible for fund management and administrative tasks. The program administrator will provide administrative support for the Mitigation Team, manage the mitigation account, and administer grants, contracts, and other agreements.

4. **Advisory Committee:** A broader advisory committee consisting of agencies, companies and organizations with the skills and commitment that will provide useful advice to the Core Team regarding the implementation of the Mitigation Framework.

The specific make up of each of these groups will be determined at a later time. Potential participants in the Mitigation Framework include but are not limited to representatives of:

State of Idaho:
- Department of Fish and Game
- Office of Energy Resources
- Office of Species Conservation
- Idaho Department of Lands

United States:
- Bureau of Land Management
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- Natural Resources Cons. Service

Energy Companies:
- Idaho Power
- Ridgeline Energy

Non-Governmental Organizations:
- Idaho Conservation League
- The Nature Conservancy

Idaho Tribes

Idaho Sage-Grouse Advisory Committee

Sage-Grouse Local Working Groups

Idaho Counties

Public Land Users (e.g., grazing interests)

G. Funding the Mitigation Program

The costs of administering the program will be sustained by the project developers that seek compensatory mitigation. Therefore, a portion of the in-lieu fee that project developers contribute to the mitigation account will be applied for program administration. As noted above, protecting and restoring sagebrush habitats are time consuming and expensive undertakings. Ensuring that these activities are conducted with strong oversight should be viewed as an exceptionally wise investment.

III. Mitigation Program Steps

The Mitigation Framework envisions a five-step process for developing, implementing, and monitoring compensatory mitigation.

A. Step 1 – Assessment of Project Impacts and Development of Mitigation Objectives

Assessment of project impacts should be undertaken by the project developers proposing new infrastructure projects and the government agencies that conduct environmental reviews of those projects. Although the Mitigation Framework process is not responsible for this step, it is nevertheless crucial to the integrity of the mitigation program. Specifically, the Framework's success in achieving its goal of offsetting major infrastructure project impacts on sage-grouse depends on an accurate accounting of those impacts.

For many projects, this analysis will be done as part of the environmental review procedures required by NEPA. As noted above, NEPA requires federal agencies to address the full range of direct, indirect and cumulative impacts of the proposed project, alternatives to the proposed action, and potential mitigation before they act on permit applications.

Once impacts have been assessed and compensatory mitigation objectives set, the project developer is ready to engage the Mitigation Framework, starting with determining the developer's in-lieu fee contribution.

B. Step 2 – Determine the In-lieu Fee Contribution

The goal of Step 2 is to use valuation techniques, such as the guidelines presented above, to convert the complex range of project impacts, including direct, indirect and cumulative impacts, into monetary terms that become the basis for the in-lieu fee payment. The accepted in-lieu fee compensatory mitigation plan could be a condition of the instrument approving the project (FONSI, ROD, right-of-way grant, conditional use permit, etc.) and thus legally requires the project developer comply with the approved mitigation plan.

C. Step 3 – Commitment of Mitigation Funds by Project Developer

Infrastructure project developers can employ the Mitigation Framework by entering into an agreement with the program administrator with regard to a specific infrastructure project. This project agreement sets forth the parties' respective responsibilities, including the project developer's commitment to pay the in-lieu fee. Importantly, the agreement provides that the project developer's funds can only be used for the purposes set forth in the Mitigation Framework. The agreement may also include "conditions" as requested by regulatory agencies or project developers. For instance, the agreement might provide that the in lieu fee will be used to fund mitigation actions in specific geographic areas in order to meet permit requirements. The program administrator, based on consultation with the MOA parties, may decline to enter into an agreement that is inconsistent with the Mitigation Framework principles or includes conditions that are burdensome or unworkable.

Once the agreement specifying the payment structure and schedule is signed, the project developer makes the required in-lieu fee deposits to an interest bearing account managed by the program administrator.

After the completion of this step, the project developer is no longer engaged in the Mitigation Framework – unless it has decided to participate as a MOA party.

D. Step 4 – Issue Request for Proposals (RFP) and Select, Implement, and Monitor Mitigation Actions

At least at annual intervals, the Mitigation Team will issue an RFP that invite private companies, non-governmental organizations, and agencies to submit proposals for sage-grouse habitat protection, restoration, and/or enhancement actions. The RFP will provide guidance to mitigation project sponsors on program priorities and criteria. These priorities and criteria will be drawn from the mitigation program strategy including identification of geographic areas where mitigation might provide the greatest benefits as well as identification of the threats that present the highest risk to the species or its core habitat. The Mitigation Team should also reach out to federal, state, and local agencies, non-governmental organizations and the general public in order to facilitate discussion, engage stakeholders, raise awareness of the program and generate responses to the RFP.

The RFP will solicit project proposals that contain an operation or implementation plan and address at least the following elements:

- Geographic area;
- Threats addressed and how the mitigation action project will offset impacts resulting from those threats;
- An analysis of current sage-grouse conditions in the area;
- Resource goals and objectives the mitigation action project will seek to provide;
- A description of any coordination with federal, state, tribal and local resource management and regulatory authorities or other stakeholder involvement required to complete the mitigation action (e.g., requirement for NEPA compliance or county permit);
- A description of recent or proposed projects and events in the vicinity of the proposed project, if any, such as fire rehabilitation treatments, restoration or enhancement treatments or other activities that complement the effectiveness or intent of the proposed, mitigation action;
- A description of the long term protection, management, stewardship for the project being implemented, and the entity responsible for these activities; and
- A commitment to periodic evaluation and reporting on the progress of the project in meeting stated goals and objectives, including a process for adaptively redirecting the project if necessary.

When selecting projects, the Mitigation Team will estimate the biological benefits of the projects activities, the likely success of those activities, the duration of benefit expected and measure those benefits in relation to the strategy and RFP objectives.

Mitigation Team and the program administrator will work together on continuing program administration and oversight including annual reporting of program activities, expenditures, and benefits. An annual program report will describe program activities, budget, and assessment of whether the mitigation strategy and associated projects are benefitting sage-grouse and at what level or scale.

The Mitigation Team and/or Program Administrator should implement a monitoring program to measure and validate whether project-specific objectives have been met. Monitoring is required of all compensatory mitigation actions to determine if the project is meeting its performance standards and objectives. As mentioned above, at regular intervals, the total habitat and/or population gains provided by the programs will be compared with the habitat/population losses associated with the participating infrastructure projects. The purpose of this comparison is to evaluate the mitigation program and make any necessary program adjustments – particularly if the monitoring shows that the mitigation benefits are not compensating for habitat losses. This comparison will not be a basis for imposing new, unexpected requirements on the infrastructure project developers.

CONCLUSION

The framework of policies, principles and procedures outlined above are meant to start a dialogue among parties engaged in sage-grouse conservation and infrastructure development. If these parties agree with the Mitigation Subcommittee that there is great value in establishing an Idaho-based compensatory mitigation program, then this framework will mark the beginning of an inclusive effort to fill in the details and complete the tasks needed to bring such a program into being. We have confidence in our collective ability to create a compensatory mitigation program that will benefit infrastructure developers, agencies, conservation interests, and – not least – Idaho's sage-grouse.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
620 SW Main Street, Suite 201
Portland, Oregon 97205-3026

9043.1
IN REPLY REFER TO:
ER14/0298

Electronically Filed

August 7, 2014

Erich Orth
Project Manager
Bonneville Power Administration - TEP-TPP-3
P.O. Box 61409
Vancouver, WA 98666-1409

Dear Mr. Orth:

The Department of the Interior has reviewed the Supplemental Draft Environmental Impact Statement for Hooper Springs Transmission Project, Caribou County, Idaho. The Department has no comments on the document at this time.

We appreciate the opportunity to comment.

Sincerely

Allison O'Brien

Allison O'Brien
Regional Environmental Officer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

August 7, 2014

Erich T. Orth
Project Manager
Bonneville Power Administration
Public Affairs–DKE-7
P.O. Box 14428
Portland, Oregon 97293-4428

Re: Comments on the SDEIS for Hooper Springs Transmission Project (EPA Project Number 10-034-BPA).

Dear Mr Orth:

In accordance with our responsibilities under the Clean Air Act §309, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the Bonneville Power Administration (BPA) Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed **Hooper Springs Transmission Project** in Caribou County, Idaho.

The SDEIS analyzes potential environmental impacts of a new route option (Option 3A) for the South Alternative, which was developed after completion of the draft EIS for the project and examination of inputs received from the public. Option 3A route would be 24 miles long and would generally follow the same route as Option 3 of the same Alternative, with the exception of two segments. The first segment is a 3.5-miles portion to the west of the Blackfoot River Narrows, which was to avoid private land to the south and associated large wetland area. The other is a 2.5-mile long segment at the eastern end of this route, which was chosen to avoid crossing areas on the Caribou-Targhee National Forest (C-TNF) and the Blackfoot River Wildlife Management Area subject to mining leases associated with the Husky-North Dry Ridge Mine, as well as the North Maybe Investigation Area. The SDEIS identifies the modified South Alternative, Option 3A, as BPA's Preferred Alternative and route.

In our comments on the draft EIS in April 2013, the EPA expressed concerns about the proposed project due to its potential impacts to water, land use and farmlands, and vegetation and wildlife resources. We appreciate BPA responses to our comments in the SDEIS. In particular, we are pleased with BPA's anticipated measures to protect water resources and avoid sensitive resource areas, such as the Blackfoot River Wildlife Management Area and wetlands, as much as possible.

Since the additional route option 3A does not introduce new impacts or significantly affect the extent of impacts previously analyzed in the draft EIS, we would support its implementation along with mitigation measures identified in the SDEIS. Because the project will require a number of permits, including Clean Water Act Section 401, 402 and 404 (p. 4-6), the final EIS should include information on the status of those permit applications and measures to protect water quality. In addition, the final EIS should include outcomes of planned consultations with the US Fish and Wildlife Service on

potential migratory birds' impacts and recommended measures to reduce risks and protect biota and habitat.

Based on our review, we believe that the SDEIS provides adequate discussion of the potential environmental impacts associated with the proposed action, including the additional route option 3A. The EPA, therefore, has rated the SDEIS as LO (Lack of Objections). An explanation of this rating is enclosed for your reference.

We appreciate the opportunity to review this SDEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at mbabaliye.theogene@epa.gov.

Sincerely,

Christine B. Reichgott

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure

1. EPA Rating System

U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

GOVERNOR'S OFFICE OF ENERGY RESOURCES

C.L. "BUTCH" OTTER
Governor

JOHN CHATBURN
Interim Administrator

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(208) 332-1660
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August 7, 2014

Erich Orth, Project Manager
Hooper Springs Transmission Line Project
Bonneville Power Administration
P.O. Box 14428
Portland, OR 97293-4428

Sent via email; hardcopy to follow

RE: Hooper Springs Transmission Line Project Supplemental Draft Environmental Impact Statement

Dear Mr. Orth:

The State of Idaho appreciates the opportunity to comment on the Hooper Springs Supplemental Draft Environmental Impact Statement (SDEIS). The Idaho Governor's Office of Energy Resources (OER) is the Cooperating Agency for the state, and submits comments on behalf of the State of Idaho and its relevant agencies.

The OER appreciates Bonneville Power Administration's (BPA) willingness to explore the southern routes as alternatives moving forward with this project. Through hard work and collaboration with the OER, BPA drafted the southern alternatives that are preferable to the OER because they have the least amount of impact on the citizens and resources within the project area.

The Idaho Department of Lands, the Idaho Department of Parks and Recreation, and the Idaho State Historic Preservation office do not have specific comments on the SDEIS and will continue to be engaged in the National Environmental Policy Act process for this project. The Idaho Office of Species Conservation (OSC) submits specific comments related to impacts on Special Status Species (see below). The Idaho Department of Fish and Game (IDFG) submits comments (attached) through the OER for your review and incorporation into the SDEIS.

Comments Related to Special Status Species

The OSC coordinates the state's policies and programs related to the conservation of threatened, endangered, and candidate species in Idaho. OSC submits the following statement on the current status of both the wolverine and the yellow-billed cuckoo.

Wolverine

While the OSC agrees that wolverines may exist within Caribou County, there is an extremely low potential that they would be adversely affected by the project. The OSC recommends that BPA use best management practices and seasonal restrictions when building the southern alternative in order to minimize impacts on this species.

Yellow-Billed Cuckoo

OSC agrees with Table 3-21 that this species will not be affected by the proposed project. There are no documented occurrences of the yellow-billed cuckoo near the proposed project area, nor any records of it occurring in Caribou County.

Comments Related to Wildlife

The IDFG, acting under the supervision of the Idaho Fish and Game Commission is the state agency charged with carrying out the statutory authority to preserve, protect, perpetuate, and manage all fish and wildlife in Idaho (Idaho Code § 36-103(a)). IDFG's specific comments regarding impacts to wildlife are attached.

Again, the State of Idaho appreciates the opportunity to submit comments on the Hooper Springs Transmission Line Project Supplemental Draft Environmental Impact Statement and we continue to look forward to working with you throughout this process.

Sincerely,

John Chatburn, Interim Administrator
Idaho Governor's Office of Energy Resources

cc: Tish Eaton, Environmental Protection Specialist, BPA

Enclosure

IDAHO DEPARTMENT OF FISH AND GAME
600 S Walnut / P.O. Box 25
Boise, Idaho 83707

C.L. "Butch" Otter / Governor
Virgil Moore / Director

Hooper Springs Transmission Project
Draft Supplemental EIS
Idaho Department of Fish and Game Comments, July 18, 2014

Idaho Department of Fish and Game appreciates the opportunity to review and comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for consideration in the final EIS and decision for the Hooper Springs Transmission Project.

We have previously provided technical information addressing potential effects on wildlife and wildlife habitat and on how adverse effects might be mitigated, particularly on Commission-owned lands to inform this SDEIS. The Fish and Game Commission (Commission) reserves their policy authority relative to future positions and decisions affecting their lands.

As noted in previous comments, the Department seeks to minimize effects to the wildlife and visual resources of Blackfoot River Wildlife Management Area (BRWMA) as well as identify possible effects to sage-grouse and other avian species, sensitive species (including plants), and big game habitat along the entire route. We appreciate the continued consultation and opportunities to work with BPA on minimization of these effects and mitigation, particularly for the segment of the preferred route option (3A), which does include construction of a portion of the project on the BRWMA. Our collaboration with BPA to address these issues will continue to bring the project to a successful conclusion.

BONNEVILLE POWER ADMINISTRATION

HOOPER SPRINGS TRANSMISSION PROJECT

"I'd like to tell you..."

Please have your studies look at:

putting the line [illegible] Road. It would not be so damaging to the [illegible] of the area.

I need more information about:

Health [illegible] of a [illegible]mission line
property [illegible] transmission line
Lives [illegible] and loss of taxes to the county.
How [illegible] giving an assessment.
Why [illegible] on the fence line.

I have these other comments:

Now that [illegible] about the transmission line
we don't give [illegible] property.
We understa[illegible] and don't accept the line it
cannot be put [illegible]

Name/Address: _____

You may also post your comments at *www.bpa.gov/comment*;
You may also call BPA at 1-800-622-4519, or FAX your comments to 503-230-4019.
Please mention "*Hooper Springs Transmission Project*" in your correspondence.

The comment period ends August 7, 2014.

The SHOSHONE-BANNOCK TRIBES

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CULTURAL RESOURCES
HERITAGE TRIBAL OFFICE (HETO)
P.O. BOX 306
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August 8, 2014

Corrina A. Ikakoula
Tribal Affairs
Bonneville Power Administration
caikakoula@bpa.gov

RE: Proposed Hooper Springs Transmission Project

Dear Ms. Ikakoula:

The Shoshone-Bannock Tribes (Tribes) Heritage Tribal Office (HeTO) appreciates the opportunity to comment on the SDEIS for the proposed Hooper Springs Transmission Project. The proposed project located near Soda Springs, Caribou County, Idaho is within inherent ancestral lands of the Shoshone and Bannock people, and continues to hold important cultural properties, traditional hunting, fishing and gathering activities still practiced today by members of the Shoshone-Bannock Tribes.

According to the information provided, "BPA is proposing to build a new, 115-kilovolt (kV) transmission line in Caribou County, Idaho from a proposed new 138/115-kV BPA substation (Hooper Springs Substation), near the city of Soda Springs, Idaho, to either an existing Lower Valley Energy (LVE) substation or a proposed BPA connection facility that would connect with LVE's existing transmission system in northeastern Caribou County. BPA also would construct an approximately 0.2-mile-long, single-circuit 138-kV transmission line between the new Hooper Springs Substation and PacifiCorp's existing Threemile Knoll Substation to connect the new line to the regional transmission grid. BPA is considering a North Alternative, including two route options (the Long Valley Road and North Highland Road options) and a South Alternative, including five route options (Options 1, 2, 3, 3A, and 4) for the proposed transmission line BPA's preferred alternative is the South Alternative's Option 3A. BPA is also considering the No Action Alternative."

Construction of the proposed transmission line project and any of the alternatives will have a profound negative long-term visual effect on portions of the project that will be visible to the public because it "would create an obvious human-made or industrial element to the landscape" which will forever alter the integrity of the natural setting of the land. "The presence of a new transmission line would initially be a visual obtrusion on the landscape, although over time motorists and residents would become familiar with the transmission line and associate it with the existing landscape." The Tribes HeTO does not agree that one will ever become familiar with the line and associate it with the landscape. The construction of the proposed project will also have an

unnatural effect on the view of the sunset or sunrise "where the structures cross the skyline or are in the viewers', foregrounds" regardless of the ***effect rating*** illustrated in the Supplemental Draft EIS.

The Tribes HeTO would like a map illustrating the locations of each of the eight prehistoric sites, located near the Blackfoot River and associated tributaries (and their survey reports), relative to the project area. The SDEIS states "Provide cultural resource monitors, as necessary, to observe ground-disturbing activities in areas of previously documented cultural sites." The Tribes agrees with having cultural resource monitors present during the ground disturbing activities since the proposed project may perhaps disturb unknown cultural sites. The Tribes HeTO requests the presence of cultural resource monitors throughout the entire process during the ground disturbing activities of the proposed project and any other areas which will be impacted and not only where known cultural resources have been identified. The Tribes HeTO realizes that surveys for a major portion of the proposed project areas may have been conducted; however, this does not rule out the existence of subsurface materials; therefore, a cultural resource monitors presence will reduce the chances of disturbing unknown cultural resources.

The Shoshone and Bannock Tribes HeTO value their cultural resources and rich history of this land which has been and currently still is being subjected to intrusive destruction. "Cultural resources in Caribou County have been and are being cumulatively affected because of past and present development activities... Cumulative impacts associated with these activities include disturbance of cultural sites, reduction of the cultural integrity of certain sites, and removal of cultural artifacts. Construction of the North Alternative or South Alternative and all route options could contribute incrementally, albeit in a very minor way, to these cumulative impacts." Most of the cumulative effects that occurred during past times were not applicable to present laws enacted exclusively for the protection of cultural resources. The Tribes HeTO hopes you will take this into consideration because the proposed project is contributing to which you describe as "Construction of the North Alternative or South Alternative and all route options could contribute incrementally, albeit in a very **minor** way, to these cumulative impacts.", is really **major** when all (past and present) effects are combined.

All proposed alternatives and routes involve major ground disturbing activities which would consist of: installation of wood and steel poles; staging areas and pulling and tensioning sites (areas required to assemble and erect the suspension and structures); construction of the Hooper Springs Substation; blasting for the construction of temporary roads; soil compaction which in turn causes the potential for a reduction in soil productivity and an increase in erosion; the construction, reconstruction and improvements on new and existing access roads including turnarounds. The proposed construction of the new roads would by far outweigh the reconstruction and improvements of existing roads. The proposed project will involve ground disturbance; therefore, the Tribes HeTO requests the following inadvertent discovery clause incorporated into the Stop Work Order Plan.

In the event of an inadvertent discovery (cultural resources and/or human remains) the Tribes HeTO requests a Stop Work Order of construction activities and immediate notification to the Tribes HeTO. Construction shall cease until proper treatment of cultural resources and/or human remains is achieved.

The purpose of this letter is to provide technical input and not intended as formal government-to-government consultation. Should there be any questions or concerns please feel free to contact me

at phone: (208) 236-1084/ e-mail: romartinez@sbtribes.com; or Carolyn Smith (Cultural Resource Coordinator) at: (208) 236-1086/ e-mail: csmith@sbtribes.com.

Sincerely,

Romelia Martinez
Cultural Resource Technician II

CC: FILE-Proposed Hooper Springs Transmission Line/BPA-OR

Appendix H

Avian Collision Risk Assessment Update

High voltage transmission lines do not typically pose an electrocution risk to birds because the spacing between conductors is greater than the wingspan of birds in the project area (APLIC 2006 and USFWS 2005). BPA designs and constructs its transmission lines consistent with Avian Power Line Interaction Committee (APLIC) standards to avoid electrocution risks. However, the presence of transmission towers/poles, conductors, and most importantly overhead ground wires, can create collision hazards for flying birds, especially where the lines cross sensitive flyways or high use areas (APLIC 2012).

An avian risk collision model was developed to better understand the potential collision risks posed by the proposed transmission line. This model, based on "*A Landscape-Scale Model to Predict the Risk of Bird Collisions with Electric Power Transmission Lines in Alberta*" (Heck 2007), identifies areas of suitable bird habitat and areas with the highest risk of avian collision fatality. The full methodology and results are described in the supplemental draft environmental impact statement for the Hooper Springs Transmission Project.

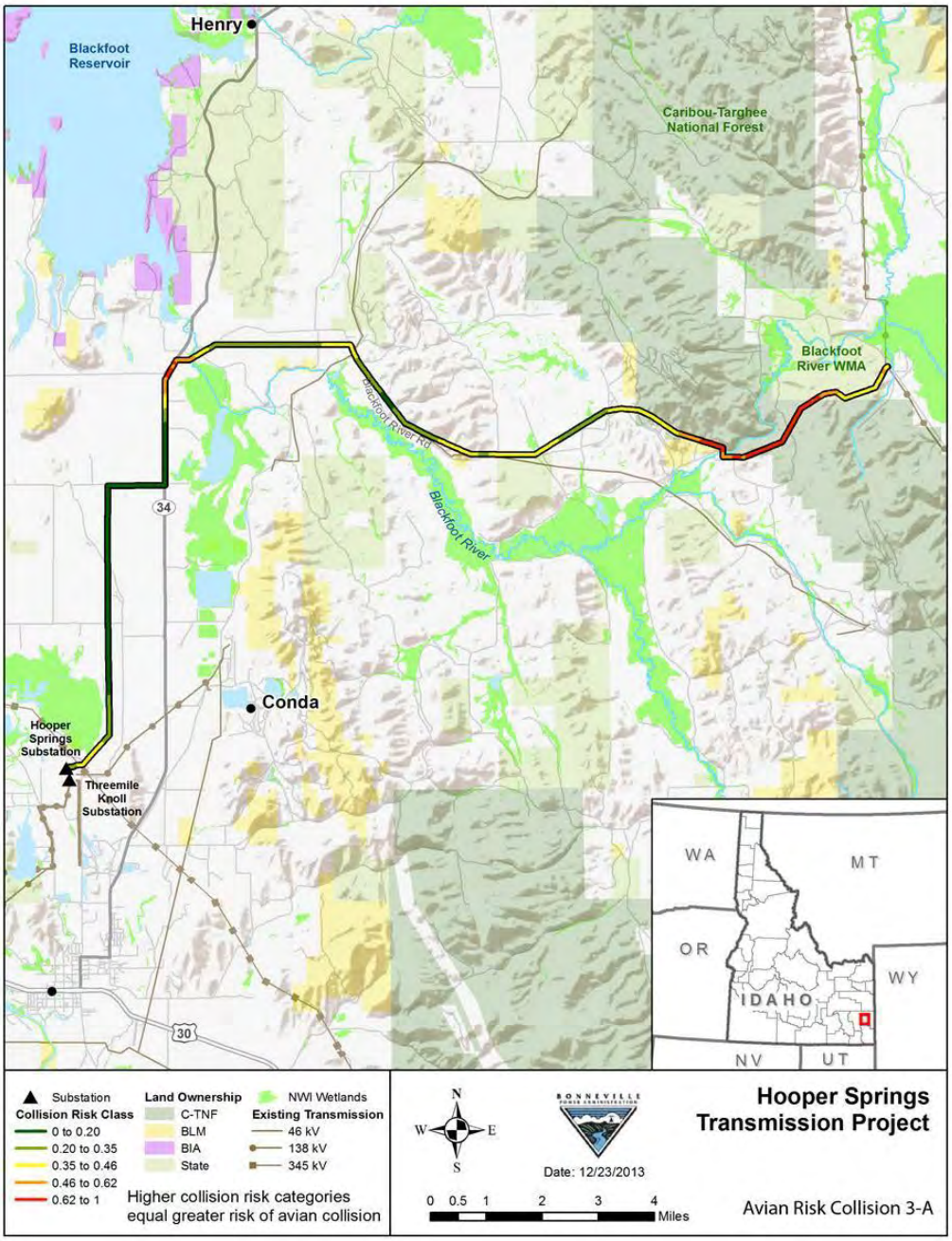
Throughout the development of the model, Bonneville Power Administration (BPA) conducted field assessments and met with representative from the Idaho Department of Fish and Game (IDFG) and United States Fish and Wildlife Service (USFWS) to develop a model that adequately reflects resource conditions and the potential hazards posed by the siting of a transmission line. The model takes into account a number of data layers and factors.

Table 1. Collision Factors

Category	Description of Category
Productive Bird Area	These are areas where the largest concentration of waterfowl and water birds are expected to be found in the study area based on known data sets.
High Habitat Use Areas	Areas that would attract waterfowl and water birds but would not necessarily support large populations.
Standing Water	These are areas where waterfowl and water birds would be expected to be found, but are not actually designated as productive bird areas.
Moving Water	These are areas where waterfowl and water birds may be found, but less likely than standing water areas and productive bird areas.
Topography	Areas with a slope greater than 10 percent relief were used as the cutoff for assigning a value.
Overhead Ground Wire (OHGW)	Because 90 percent of collisions on the OHGW (APLIC 2012), it is important to be able to identify their presence or absence.

Initial model runs for Option 3A resulted in the following assignment of risk along the proposed transmission line.

Figure 1. Supplemental Draft EIS Version of Avian Collision Risk Option 3A



However, based on continued discussions with IDFG and resource surveys allowing for improved data inputs, the model allowed for several modifications that increase model sensitivity and improve overall confidence in model output. Table 2 identifies changes in data used to identify areas of higher collision risk.

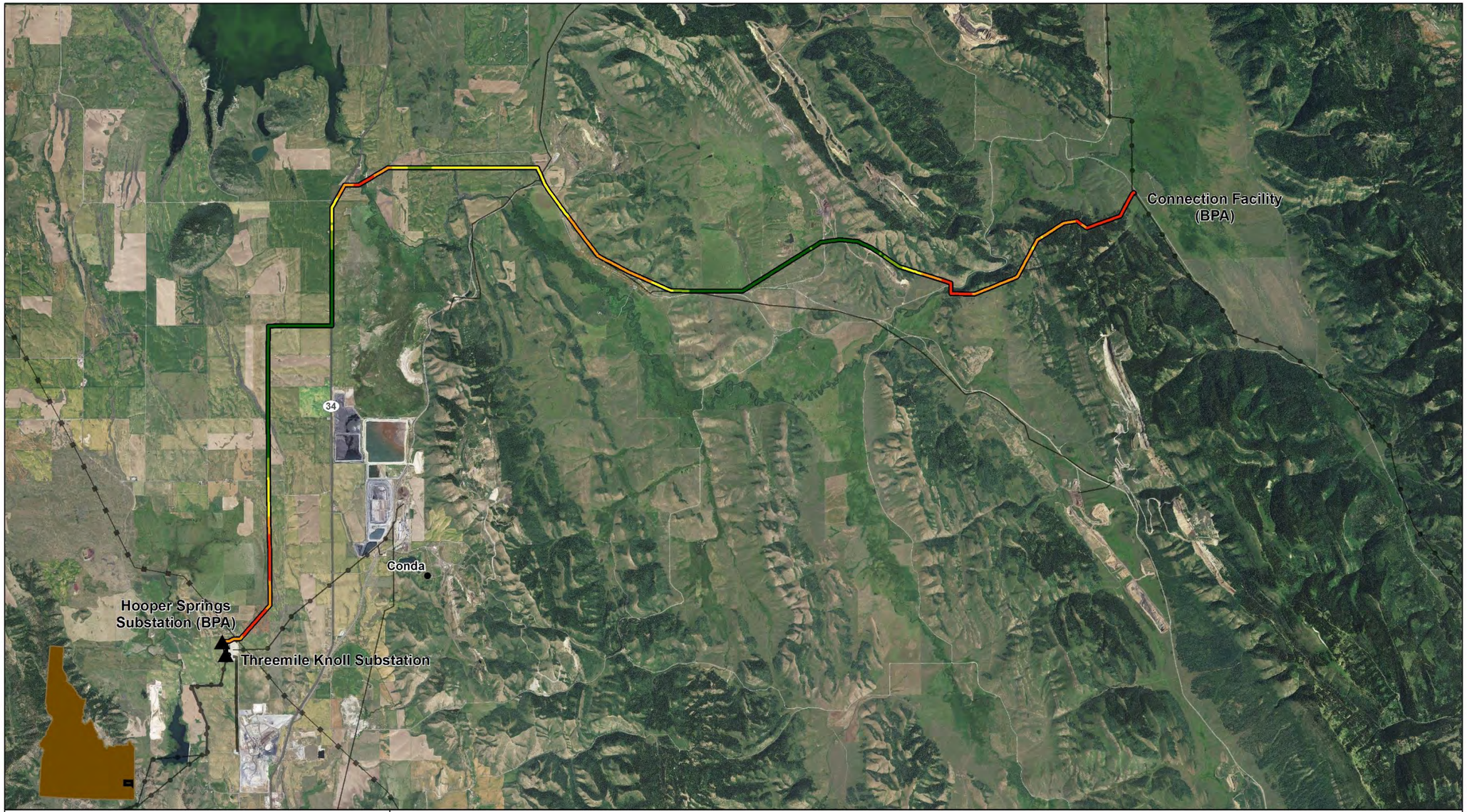
The Productive Bird Area layer was updated to include the Hooper Springs wetland complex and Blackfoot River (100-foot buffer). These two layers were included in previous model runs but prioritized as standing and moving water, which received a lower assignment of risk. In addition, the non-forested areas of the Wildlife Management Area (WMA) were included as a Productive Bird Area. Based on discussions with IDFG, public lands were removed from the model. They were originally included because public lands often provide high habitat use areas; however, given the active mining on the public lands in the area, it was determined that they should be removed. Although it was recognized that several areas of public lands were being managed specifically for wildlife, they were included as Productive Bird Areas, such as the non-forested area of the WMA, the National Wildlife Refuge, and associated wet meadow complexes with existing data sets.

The following map of Option 3A reflects the changes made to the data sets and more accurately describes the collision risk along the proposed line. This map will be used for the development of a marking plan to reduce collision risk.

Table 2. Changes in Data Used to Identify High Collision Risk

Previous Data Inputs	New Data Inputs	Change
Productive Bird Area - these are areas where the largest concentration of waterfowl and water birds are expected to be found		
Important Bird Areas	Important Bird Areas	No change
n/a	Hooper Springs wetland complex	Added to PBA layer
n/a	Blackfoot River (100 foot buffer)	Added to PBA layer
n/a	Non-forested areas in Blackfoot River WMA	Added to PBA layer
High Habitat Use Areas - areas that would attract waterfowl and water birds but wouldn't necessarily support large populations		
Public lands	n/a	Removed public lands layer from model*
Idaho Foundation for Parks and Lands (from Inside Idaho)	Idaho Foundation for Parks and Lands (from Inside Idaho)	No change
Standing Water		
Some NWI wetlands?	NWI wetlands	No change
Some NHD waterbodies?	NHD waterbodies	No change
Delineated wetlands	All delineated and assessed wetlands	No change
Moving Water		
NHD flowline	NHD flowline	No change
Topography		
Steep Slopes	Steep slopes	No change

*With the removal of the public lands layer, there are no high habitat use areas within the vicinity of Option 3A.


Connection Facility
(BPA)
34
Conda
Hooper Springs
Substation (BPA)
Threemile Knoll Substation
Substation
City
Local Road
State Route
Collision Risk Value
0.05 to 0.19
0.20 to 0.32
0.33 to 0.45
0.46 to 0.57
0.58 to 0.71
Existing Transmission
46 kV
138 kV
345 kV
N
W
E
S
Coordinate System: NAD 1983 State Plane
Idaho East (feet)
Projection: Transverse Mercator
Datum: North American 1983
0 0.5 1 2 3 4 5 Miles
Sources: Audubon Important Bird Areas,
IDFG Blackfoot River Wildlife Management Area,
NWI Wetlands, NHD Waterbodies,
NHD Flowlines, National Elevation Dataset (10m),
USDA-NRCS NAIP Imagery 2011
Hooper Springs Transmission Project
Option 3A
Avian Collision Risk
Predictive Model
BONNEVILLE POWER ADMINISTRATION
Date: 10/28/2014

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USFWS (U.S. Fish and Wildlife Service). 2014. Threatened, Endangered, Candidate, and Delisted Species – Idaho Fish and Wildlife Office. July 2011. Available at: http://www.fws.gov/idaho/species/T&E/TE072611IFWOREV.pdf. Accessed August 21, 2014.

USFWS. 2005. Avian Protection Plan (APP) Guidelines. Prepared jointly with the Edison Electric Institute's Avian Power Line Interaction Committee (APLIC). April 2005.

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