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P.O. Box 513
Green River, WY 82935

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Mr. Walt George
Project Manager Gateway West Transmission
Line Project DEIS
Bureau of Land Management
P.O. Box 20879
Cheyenne, WY 82003

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OCI WYOMING, L.P.
254 County Road 4-6
Green River, WY 82935
Phone: 307-875-2600

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OCI

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CHEYENNE, WYOMING

October 26, 2011

Mr. Walt George
Project Manager Gateway West Transmission Line Project DEIS
Bureau of Land Management
P.O. Box 20879
Cheyenne, WY 82003

Gateway_West_WYMail@blm.gov

RE: OCI Wyoming, L.P. Comments on the Gateway West Transmission Line Project Draft Environmental Impact Statement

Dear Mr. George:

OCI Wyoming, L.P. (OCI) values the opportunity to respond to the July 29, 2011 Federal Register Notice of Availability for the Draft Environmental Impact Statement (DEIS) and potential Resource Management Plan amendments for the proposed Gateway West 230/500 kV Transmission Line Project (Project). Within Wyoming, the Project encompasses portions of lands (mineral) leased by OCI and has the potential to substantially affect ongoing operations at our trona mine and soda ash plant.

OCI is actively mining trona on leases covering Sections 1-5, 7-29, 33, 35 36 T20N R109W, Sections 25, 35, 36 T21N R109, Sections 16, 19, 21, 28-34 T21N R108W and Sections 5-8, 18,19 T20N R108W. The proposed location for the transmission line is through the heart of OCI's active leases. This has the potential for significant future damage to the transmission line or to sterilize and prevent recovery of trona in these areas, as the result of techniques such as long-wall mining and solution mining that could result in subsidence.

The draft EIS does not adequately address the rights of existing trona lease holders or the economic impacts that the proposed transmission line location will have on our operation. Therefore we strongly oppose putting the Gateway West transmission line in this area. We propose that it be moved to the north or south of OCI trona leases to prevent loss of the trona resource or damage to the transmission line. There are existing power-lines that run to the north and south of the heart of OCI's trona leases that are already impacted and there would be much less impact if one of these locations were used.

OCI looks forward to working with BLM and the Proponent to maintain reasonable access to its trona resources to the greatest extent feasible. Should you require more information please contact me.

Sincerely,

Mike Hohn

Mike Hohn
Site Manager

"Garry Miller"
<Garry.Miller@tac-denver.com>
10/28/2011 05:11 PM

To <Gateway_West_WYMail@blm.gov>
cc
bcc
Subject Gateway West Transmission Line Project DEIS

Dear Mr. George,

Attached are the comments of The Overland Trail Cattle Company LLC concerning the Gateway West Transmission Line Project Draft Environmental Impact Statement. A hard copy will follow by overnight express.

Respectfully submitted,

Garry Miller

The Overland Trail Cattle Company LLC

<<2011-10-28 TOTCO Comments on GWW DEIS.pdf>> 2011-10-28 TOTCO Comments on GWW DEIS.pdf

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Denver, CO 80202
303-298-1000
Facsimile 303-299-1518

P. O. Box 688
Saratoga, WY 82331
307-326-5970
Facsimile 307-326-5977

Via E-mail: Gateway_West_WYMail@blm.gov
and Overnight Express

October 28, 2011

Bureau of Land Management
Gateway West Transmission Line Project
5353 Yellowstone Road
Cheyenne, Wyoming 82009

Attention: Mr. Walt George, Project Manager

Re: Comments on Gateway West Transmission Line Project Draft Environmental Impact Statement

Dear Mr. George:

The Overland Trail Cattle Company LLC ("TOTCO") submits these comments on the Draft Environmental Impact Statement ("DEIS") for the Rocky Mountain Power and Idaho Power (together the "Proponents") Gateway West Transmission Line Project ("GWW Project"). Proposed and alternative routes under review by Bureau of Land Management ("BLM") for the GWW Project cross lands owned by TOTCO. As there are no proposed or alternative routes that do not cross TOTCO owned property, TOTCO will be impacted by the GWW Project.

TOTCO owns and operates the Overland Trail Ranch (the "Ranch"), which encompasses about 320,000 acres in Carbon County, Wyoming. The Ranch lies roughly between State Highway 130 (the Saratoga Highway) and State Highway 71 (Sage Creek Road) and south from Interstate Highway 80 for more than 20 miles. The Ranch is a working cow/calf and yearling operation, and it holds a number of BLM grazing leases for allotments south of Rawlins, Wyoming. Much of the Ranch is within the "checkerboard" arrangement of public and private land.

The highest and best use of the Ranch is for development of wind energy generation facilities, such as the Chokecherry and Sierra Madre Wind Energy Project ("CCSM Wind Project") as demonstrated by the world class wind resource identified on the Ranch. TOTCO has committed lands to wind energy resource development as part of the CCSM Wind Project under

development by TOTCO's affiliate Power Company of Wyoming LLC ("PCW"). This highest and best use can be developed, while allowing TOTCO to maintain its agricultural operations. In addition, TOTCO has committed certain lands to its affiliate TransWest Express LLC for siting of transmission lines and facilities related to the development of the TransWest Express Transmission Project ("TWE Project"). Conceptually, but subject to the concerns expressed herein, TOTCO supports the development of environmentally responsible electric transmission projects.

TOTCO respectfully submits the following comments related to the GWW Project DEIS:

Segments of the proposed GWW Project cross land owned by TOTCO within the I-80 corridor from approximately east of Fort Steele to the Sage Creek Road (GWW Project Segments 2, 2A and 2B). BLM should be aware that there are a number of other projects underway within this corridor, including the TWE Project, the Energy Gateway South Project, and the CCSM Wind Project. Union Pacific is also considering a new rail distribution facility planned within this area on land owned by TOTCO. Siting of the GWW Project transmission line through this area will require careful consideration of and coordination with other project developers.

The proposed GWW Project must be planned and sited so as to avoid interference with the siting, construction and operation of the CCSM Wind Project and transmission lines and facilities related to the development of the TWE Project, both of which are projects to which TOTCO has committed lands. The proposed GWW Project must also be planned and sited so as to avoid interference with TOTCO's use and possession of its lands and must not impair TOTCO's use of its other properties. BLM should consider these existing and future projects as well as TOTCO's existing operations in its decision making process.

Proposed mitigation measure LU-4 (page 3.17-74) which would require coordination with the CCSM Wind Project and the TransWest Express Project developers along the Segment 2 Proposed Route to ensure mutually compatible siting of transmission lines and wind energy facilities would address a number of the issues raised above and we encourage BLM to include this mitigation measure in its Record of Decision for the GWW Project and right-of-way grants.

The Proponents will need to obtain both a transmission line easement and an access easement from TOTCO to cross Ranch lands. The location of the easements will have to avoid all present and future land uses of TOTCO and its affiliates. If not properly sited, such entry and activities may cause not only physical damage to TOTCO's property, but may substantially interfere with TOTCO's possession and use of its property, as well as the possession and use by PCW and TWE. Such entry and activities may also impair the use by TOTCO of its other properties. To prevent damages and injury to TOTCO and its affiliates, TOTCO requests that BLM maintain flexibility in the final siting of the GWW Project so that a mutually agreeable route can be developed in cooperation with landowners and other stakeholders.

TOTCO is also concerned with the design variation for Segment 2 described in Section 2.1.2 which may allow two single-circuit 500 kV structures in a 350-footwide right-of-way. Such a configuration would not promote the efficient use of corridors, would result in larger impacts to TOTCO's private lands, and present difficulties and uncertainty in future Ranch land use planning. The Wyoming Governor's policy is that large interstate transmission lines should be "super-sized" to avoid a proliferation of transmission lines and resulting land use impacts. In the Final Environmental Impact Statement ("FEIS"), BLM should evaluate whether allowing two single-circuit 500 kV structures instead of requiring a single double-circuit 500 kV structure is the highest and best use of its transmission corridors, promotes multiple use, and if such a configuration is compliant with the Wyoming Governor's objectives for transmission development.

In the area of the Ranch, TOTCO prefers Segment 2A as this route would have the least impact on present and future land uses on the Ranch, including the least interference with the TWE Project and the CCSM Wind Project to which TOTCO has committed lands. Segment 2 between reference points 2e.1 and 2e.3 (as shown on Figure A-3) would have the most impact on present and future Ranch land uses. In the FEIS, the BLM should consider impacts for Segments 2, 2A and 2B on the TWE Project and the CCSM Wind Project prior to granting a right-of-way for any of these Segments.

Page 3.17-76 describes the expected impacts of OHV use for Segment 2 and compares the proposed route to Alternatives 2A and 2B. It appears that Alternative 2B would likely have the least effect regarding unauthorized OHV use. TOTCO is very concerned about illegal OHV use and trespass on private lands. As noted in the DEIS, it is difficult to physically close routes to unauthorized OHV use and posting signs and implementing blocking measures have limited effect. The BLM and the Proponents should commit to working with landowners to find more effective means to limit unauthorized OHV use and more effective mitigation should be developed.

The DEIS describes a possible plan amendment for Segment 2 in the area of the North Platte River SRMA (page F.1-10). As this area is within the checkerboard land ownership, TOTCO believes that any plan amendment should classify the public lands as Visual Resource Management ("VRM") Class IV for the reason that the BLM lacks management authority over the private lands (owned by TOTCO) and has no control over actions taken by private landowners. Therefore, the BLM has no ability to manage for more restrictive visual resource objectives as required by VRM Classes I, II or III. Should a plan amendment be required in the area south of Fort Steele (Segments 2, 2A or 2B) or within any checkerboard ownership, BLM should address in the FEIS its ability to manage visual resources on federal lands where it has no control over actions on adjacent private surface ownership.

The DEIS does not appear to have considered the pending VRM Plan Amendment for a portion of the Rawlins Field Office. *see* Notice of Availability, 76 Fed. Reg. 44039, July 22, 2011. The Decision Area for the draft VRM Plan Amendment includes a portion of Segments 2,

2A and 2B of the GWW Project. TOTCO recommends that the FEIS incorporate the decision on the pending VRM Plan Amendment or, if no decision has been rendered by that time, at least incorporate discussion of the Preferred Alternative under the draft plan amendment.

TOTCO recently learned of a planned CO_2 pipeline proposed by DKRW that would cross the Ranch in the vicinity of the I-80 corridor and the GWW Project proposed and alternate routes. This pipeline is not described under Section 4.2.2.3 (cumulative effects) of the DEIS. BLM should confirm whether the proposed DKRW pipeline is a reasonably foreseeable future action and, if so, described the pipeline's cumulative effects in the FEIS.

Thank you for your consideration of these comments.

Very truly yours,

THE OVERLAND TRAIL CATTLE COMPANY LLC

Garry L. Miller
Director – Land and Environmental Affairs

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Walt George
Bureau of Land Management
5353 Yellowstone Road

Cheyenne, WY 82009

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Via E-mail: Gateway_West_WYMail@blm.gov
and Overnight Express

October 28, 2011

Bureau of Land Management
Gateway West Transmission Line Project
5353 Yellowstone Road
Cheyenne, Wyoming 82009

Attention: Mr. Walt George, Project Manager

Re: Comments on Gateway West Transmission Line Project Draft Environmental Impact Statement

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Duplicate

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Duplicate

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Thank you for your consideration of these comments.

Very truly yours,

THE OVERLAND TRAIL CATTLE COMPANY LLC

Garry L. Miller
Director – Land and Environmental Affairs

Duplicate

From: info@gatewayeis.com
Sent: Wednesday, October 26, 2011 5:53 PM
To: Gateway BLM
Subject: A comment from gatewayeis.com

Name:
John Teeter

Organization:
People Power Company

Mailing Address:
15401 Bates Creek Rd

Mailing Address 2:

City:
Oreana

State:
ID

Zip:
83650

Daytime Phone:
208 874 2269

E-mail:
john.teeter@peoplepowerco.com

Confidential:
No

DEIS Location:
chapter 1 section 1 page 1-1

Comment:
The stated purpose and need, as stated below, are incompletely articulated. The "is principally necessary to serve future needs in Utah and Idaho, though other markets may also be served, ..." is purposely vague and pointedly incorrect.

There are better (technical) ways to accomplish deployment of a sustainable electrical infrastructure for the southern portion of Idaho and the northeast corner of Utah.

In light of this misleading justification, the whole of the DEIP is an unneeded analysis. As response to that effect should be returned to the requesting project entities (Idaho Power and Pacificorp DBA Rocky Mountain Power).

== documented text of project justification ==

The proposed transmission line is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 3,000 megawatts (MW) of additional energy for the Proponents’ larger service areas and to other interconnected systems. The Project is principally necessary to serve future needs in Utah and Idaho, though other markets may also be served, including Wyoming’s oil and gas field electricity needs.

"Garry Miller"
<Garry.Miller@tac-denver.com>
10/28/2011 05:09 PM

To <Gateway_West_WYMail@blm.gov>
cc
bcc
Subject Gateway West Transmission Line Project DEIS

Dear Mr. George,

Attached are the comments of Power Company of Wyoming LLC concerning the Gateway West Transmission Line Project Draft Environmental Impact Statement. A hard copy will follow by overnight express.

Respectfully submitted,

Garry Miller

Power Company of Wyoming LLC

<<2011-10-28 PCW Comments on GWW DEIS.pdf>> 2011-10-28 PCW Comments on GWW DEIS.pdf

Power Company of Wyoming LLC
555 Seventeenth Street
Suite 2400
Denver, CO 80202
Tel 303.298.1000
Fax 303.299.1356

Via E-mail: Gateway_West_WYMail@blm.gov
and Overnight Express

October 28, 2011

Bureau of Land Management
Gateway West Transmission Line Project
5353 Yellowstone Road
Cheyenne, Wyoming 82009

Attention: Mr. Walt George, Project Manager

Re: Comments on Gateway West Transmission Line Project Draft Environmental Impact Statement

Dear Mr. George:

Power Company of Wyoming LLC ("PCW") submits these comments on the Draft Environmental Impact Statement ("DEIS") for the Rocky Mountain Power and Idaho Power (together the "Proponents") Gateway West Transmission Line Project ("GWW Project"). PCW is developing the Chokecherry and Sierra Madre Wind Energy Project ("CCSM Wind Project"), a 1,000 turbine wind energy project, on lands potentially impacted by the GWW Project.

The CCSM Wind Project will be located on the Overland Trail Ranch (the "Ranch") owned by PCW affiliate, The Overland Trail Cattle Company LLC ("TOTCO"). Located south of Rawlins and Sinclair in Carbon County, Wyoming, the Ranch encompasses approximately 320,000 acres. The Ranch consists of about half private land and half federal land managed by the Bureau of Land Management ("BLM") along with a small percentage of state-owned parcels and includes a large amount of "checkerboard" lands, consisting of alternating sections of public and private ownership. The Ranch has some of the best wind resources in the nation - Class 6 and 7 - along with very buildable terrain. The CCSM Wind Project will be located on approximately 100,000 acres of the Ranch and will generate 2,000 – 3,000 megawatts of clean, renewable wind energy. The total permanent land disturbance for the CCSM Wind Project will be less than 2,000 acres. The CCSM Wind Project is exactly the type of large-scale renewable energy development that the Administration has said is crucial to help transform America's energy economy. The CCSM Wind Project will provide clean power to approximately 800,000 homes in highly populated metropolitan areas in California, Arizona and Nevada and aligns with federal policies and goals, provides important economic benefits including hundreds of jobs, and provides significant carbon reduction and other environmental advantages.

In 2008, PCW submitted an application to BLM for a wind energy development right-of-way grant for the CCSM Wind Project. Upon reviewing PCW's CCSM Wind Project development proposal, the Rawlins Field Office of the BLM determined that an EIS would be prepared pursuant to Section 102 (2)(C) of the NEPA. The CCSM Wind Project EIS process was formally initiated in July 2008, when BLM published in the Federal Register its Notice of Intent to prepare an EIS for the CCSM Wind Project. The Notice of Availability of the draft EIS was published July 22, 2011 (76 Fed. Reg. 44039). A final EIS and Record of Decision are expected by the fall of 2012.

PCW supports development of the GWW Project subject to the caveats and concerns expressed herein and respectfully submits the following comments related to the GWW Project DEIS:

Segments of the proposed GWW Project cross land owned by TOTCO, upon which PCW owns the wind development rights or the right to site facilities and infrastructure related to wind energy development. The Segments are within the I-80 corridor from approximately Fort Steele to the Sage Creek Road (GWW Project Segments 2, 2A and 2B). PCW supports these route Segments because they are within an existing utility corridor in an area already impacted by development. However, BLM should be aware that there are a number of other projects underway within this corridor including the TransWest Express Transmission Project under development by PCW's affiliate TransWest Express LLC, PCW's CCSM Wind Project, and the Energy Gateway South Project, which is also being developed by Rocky Mountain Power. Union Pacific is also discussing a new rail distribution facility planned within this area on land owned by TOTCO. The proposed GWW Project must be planned and sited so as to avoid interfering with the siting, construction and operation of the TransWest Express Transmission Project as well as the CCSM Wind Project. The BLM should consider these existing and future projects in its decision making process.

Siting of the GWW Project transmission line through this area will require careful consideration of and coordination with other project developers. In particular, the GWW Project transmission line must be sited so as to avoid wind energy development areas and facilities planned to support the CCSM Wind Project such as substations, transmission and collector lines, haul roads, laydown yards and the previously mentioned rail distribution facility. If the GWW Project interferes with the siting, construction and/or operation of PCW's CCSM Wind Project, in general, or the wind energy development areas and facilities planned to support the CCSM Wind Project, such entry and activities would cause not only physical injury to the property, but would substantially interfere with PCW's possession and use of the property, would substantially interfere and damage PCW's CCSM Wind Project, and would impair the use of other property within the CCSM Wind Project area.

The BLM should maintain flexibility in its record of decision and issuance of right-of-way grants for the GWW Project Proponents to work with local landowners and other project developers to site the GWW Project facilities so as to avoid and minimize impacts to present and

reasonably foreseeable future land uses and activities, including the CCSM Project. In addition, the BLM should disclose in the Final Environmental Impact Statement ("FEIS") its plans to coordinate amongst the various applicants and existing right-of-way grantees so as to meet BLM's multiple use mission.

Proposed mitigation measure LU-4 (page 3.17-74) which would require coordination with the Chokecherry and Sierra Madre Wind Farm and the TransWest Express Transmission Project developers along the GWW Project Segment 2 to ensure mutually compatible siting of transmission lines and wind energy facilities would address a number of the issues raised above and we encourage BLM to include this mitigation measure in its Record of Decision for the GWW Project and right-of-way grants.

PCW commends the BLM on Chapter 4, which does a good job of describing the existing and proposed projects within the GWW Project vicinity and the potential cumulative impacts of the GWW Project when added to the impacts of those other existing and potential developments. However, there is an incorrect statement on page 4-45 describing the CCSM Wind Project. As discussed above, the CCSM Wind Project is a proposed 2,000 - 3,000 megawatt wind energy project (the DEIS erroneously lists the production capacity at about 2,000 MW total). The DEIS also incorrectly describes the CCSM Wind Project as being within mapped sage-grouse core area. The project is not within sage-grouse core area as established by Wyoming Executive Order 2011-5. This error should be corrected in the FEIS. The DEIS correctly notes that the proposal is still current. In fact, as stated above, the BLM published the Notice of Availability of the draft EIS on July 22, 2011 and a Record of Decision is expected in 2012.

Thank you for your consideration of these comments.

Very truly yours,

POWER COMPANY OF WYOMING LLC

Garry L. Miller
Director – Land and Environmental Affairs

100328, 100372, 100503

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Karen Denard
Anschutz Exploration Corporat
555 17th St.
Suite 2400
Denver, CO 80202

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BILL SENDER

Walt George
Bureau of Land Management
5353 Yellowstone Road

Cheyenne, WY 82009

Ref #
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Dept #

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TRK# 0201 7953 4946 0233

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Power Company of Wyoming LLC
555 Seventeenth Street
Suite 2400
Denver, CO 80202
Tel 303.298.1000
Fax 303.299.1356

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Via E-mail: Gateway_West_WYMail@blm.gov
and Overnight Express

October 28, 2011

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Gateway West Transmission Line Project
5353 Yellowstone Road
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Dear Mr. George:

Power Company of Wyoming LLC ("PCW") submits these comments on the Draft Environmental Impact Statement ("DEIS") for the Rocky Mountain Power and Idaho Power (together the "Proponents") Gateway West Transmission Line Project ("GWW Project"). PCW is developing the Chokecherry and Sierra Madre Wind Energy Project ("CCSM Wind Project"), a 1,000 turbine wind energy project, on lands potentially impacted by the GWW Project.

The CCSM Wind Project will be located on the Overland Trail Ranch (the "Ranch") owned by PCW affiliate, The Overland Trail Cattle Company LLC ("TOTCO"). Located south of Rawlins and Sinclair in Carbon County, Wyoming, the Ranch encompasses approximately 320,000 acres. The Ranch consists of about half private land and half federal land managed by the Bureau of Land Management ("BLM") along with a small percentage of state-owned parcels and includes a large amount of "checkerboard" lands, consisting of alternating sections of public and private ownership. The Ranch has some of the best wind resources in the nation - Class 6 and 7 - along with very buildable terrain. The CCSM Wind Project will be located on approximately 100,000 acres of the Ranch and will generate 2,000 – 3,000 megawatts of clean, renewable wind energy. The total permanent land disturbance for the CCSM Wind Project will be less than 2,000 acres. The CCSM Wind Project is exactly the type of large-scale renewable energy development that the Administration has said is crucial to help transform America's energy economy. The CCSM Wind Project will provide clean power to approximately 800,000 homes in highly populated metropolitan areas in California, Arizona and Nevada and aligns with federal policies and goals, provides important economic benefits including hundreds of jobs, and provides significant carbon reduction and other environmental advantages.

Power Company of Wyoming LLC

In 2008, PCW submitted an application to BLM for a wind energy development right-of-way grant for the CCSM Wind Project. Upon reviewing PCW's CCSM Wind Project development proposal, the Rawlins Field Office of the BLM determined that an EIS would be prepared pursuant to Section 102 (2)(C) of the NEPA. The CCSM Wind Project EIS process was formally initiated in July 2008, when BLM published in the Federal Register its Notice of Intent to prepare an EIS for the CCSM Wind Project. The Notice of Availability of the draft EIS was published July 22, 2011 (76 Fed. Reg. 44039). A final EIS and Record of Decision are expected by the fall of 2012.

PCW supports development of the GWW Project subject to the caveats and concerns expressed herein and respectfully submits the following comments related to the GWW Project DEIS:

Segments of the proposed GWW Project cross land owned by TOTCO, upon which PCW owns the wind development rights or the right to site facilities and infrastructure related to wind energy development. The Segments are within the I-80 corridor from approximately Fort Steele to the Sage Creek Road (GWW Project Segments 2, 2A and 2B). PCW supports these route Segments because they are within an existing utility corridor in an area already impacted by development. However, BLM should be aware that there are a number of other projects underway within this corridor including the TransWest Express Transmission Project under development by PCW's affiliate TransWest Express LLC, PCW's CCSM Wind Project, and the Energy Gateway South Project, which is also being developed by Rocky Mountain Power. Union Pacific is also discussing a new rail distribution facility planned within this area on land owned by TOTCO. The proposed GWW Project must be planned and sited so as to avoid interfering with the siting, construction and operation of the TransWest Express Transmission Project as well as the CCSM Wind Project. The BLM should consider these existing and future projects in its decision making process.

Duplicate

Siting of the GWW Project transmission line through this area will require careful consideration of and coordination with other project developers. In particular, the GWW Project transmission line must be sited so as to avoid wind energy development areas and facilities planned to support the CCSM Wind Project such as substations, transmission and collector lines, haul roads, laydown yards and the previously mentioned rail distribution facility. If the GWW Project interferes with the siting, construction and/or operation of PCW's CCSM Wind Project, in general, or the wind energy development areas and facilities planned to support the CCSM Wind Project, such entry and activities would cause not only physical injury to the property, but would substantially interfere with PCW's possession and use of the property, would substantially interfere and damage PCW's CCSM Wind Project, and would impair the use of other property within the CCSM Wind Project area.

The BLM should maintain flexibility in its record of decision and issuance of right-of-way grants for the GWW Project Proponents to work with local landowners and other project developers to site the GWW Project facilities so as to avoid and minimize impacts to present and

Power Company of Wyoming LLC

reasonably foreseeable future land uses and activities, including the CCSM Project. In addition, the BLM should disclose in the Final Environmental Impact Statement ("FEIS") its plans to coordinate amongst the various applicants and existing right-of-way grantees so as to meet BLM's multiple use mission.

Proposed mitigation measure LU-4 (page 3.17-74) which would require coordination with the Chokecherry and Sierra Madre Wind Farm and the TransWest Express Transmission Project developers along the GWW Project Segment 2 to ensure mutually compatible siting of transmission lines and wind energy facilities would address a number of the issues raised above and we encourage BLM to include this mitigation measure in its Record of Decision for the GWW Project and right-of-way grants.

PCW commends the BLM on Chapter 4, which does a good job of describing the existing and proposed projects within the GWW Project vicinity and the potential cumulative impacts of the GWW Project when added to the impacts of those other existing and potential developments. However, there is an incorrect statement on page 4-45 describing the CCSM Wind Project. As discussed above, the CCSM Wind Project is a proposed 2,000 - 3,000 megawatt wind energy project (the DEIS erroneously lists the production capacity at about 2,000 MW total). The DEIS also incorrectly describes the CCSM Wind Project as being within mapped sage-grouse core area. The project is <u>not</u> within sage-grouse core area as established by Wyoming Executive Order 2011-5. This error should be corrected in the FEIS. The DEIS correctly notes that the proposal is still current. In fact, as stated above, the BLM published the Notice of Availability of the draft EIS on July 22, 2011 and a Record of Decision is expected in 2012.

Thank you for your consideration of these comments.

Duplicate

Very truly yours,

POWER COMPANY OF WYOMING LLC

Garry L. Miller
Director – Land and Environmental Affairs

From: jmclain@blm.gov
Sent: Monday, October 17, 2011 7:29 AM
To: blm@gwcomment.com
Subject: Fw: Q Creek Ranch Comments on Gateway West Draft EIS
Attachments: Q Creek Ranch Draft EIS Comments on Gateway.pdf

----- Forwarded by Joy Mclain/WYSO/WY/BLM/DOI on 10/17/2011 08:29 AM -----

"Dan "
<dan@kroenkeranch
es.com>
10/06/2011 04:48
PM

To
<Gateway_West_WYMail@blm.gov>
cc
Subject
Q Creek Ranch Comments on Gateway
West Draft EIS

Daniel Zyvoloski
Q Creek Ranch
o: 406-522-0752
c: 406-570-2716
dan@kroenkeranches.com
(See attached file: Q Creek Ranch Draft EIS Comments on Gateway.pdf)

Q CREEK LAND AND LIVESTOCK

PO Box 11350
Bozeman, MT 59719

(406) 522-0752 phone
(406) 582-0361 fax

Attention: Gateway West Transmission Line Project
Bureau of Land Management
Gateway West Project
PO Box 20879
Cheyenne, WY 82003

October 5, 2011

Submitted via email to Gateway_West_WYMail@blm.gov

RE: Q Creek Ranch Comments on the Gateway West Transmission Line Draft EIS

On July 29th, 2011, the BLM made the Draft EIS for the Gateway West Transmission Line available for public review. Q Creek Land and Livestock ("Q Creek Ranch") submits the following comments on the Draft EIS for the BLM's consideration. Foremost, Q Creek Ranch will have its deeded land transected by the proposed Gateway West Transmission Line for approximately 18.1 miles in Carbon County using the proposed 1Wa, 1Wc, 1E, and 2 routes. Q Creek Ranch has no opposition to any of the routes except the proposed 1E segment. Not only has the proposed 1E route drawn stern opposition, thus slowing down the NEPA process, it may not be required due to an abundance of power generating resources along the 1W segments. The routes supported by Q Creek Ranch are those routes that parallel existing transmission lines, thus limiting the impact to the landscape.

The Purpose and Need presented by Idaho Power Company and PacifiCorp will benefit Q Creek Ranch and surrounding landowners by allowing its world class wind energy resources to get developed. The direct economic benefits to rural Wyoming generated by the construction of the transmission line and the royalties provided by the subsequent wind energy generation will allow the ranching way of life to continue for future generations.

Q Creek Ranch understands the impact that the transmission line will have on landscape and believes that the Environmental Protection Plans and Measures proposed by the proponents are adequate to address any adverse impact to the land. Q Creek Ranch would like to see the BLM support the use of mitigation banking as a tool to offset any negative impacts to the landscape in this EIS. Mitigation banking will expedite the NEPA permitting and allow for the overall landscape condition to improve for wetlands and sensitive flora/fauna.

In conclusion, Q Creek Ranch supports the construction and operation of the proposed Gateway West transmission line as proposed by Idaho Power Company and PacifiCorp in the Proposed Action.

Sincerely,

Sam Connolly
General Manager – Q Creek Ranch

"Anderson, Pam" <Pam.Anderson@PacifiCorp.com>

10/28/2011 03:12 PM

To "Gateway_West_WYMail@blm.gov" <Gateway_West_WYMail@blm.gov>

cc "'walt_george@blm.gov'" <walt_george@blm.gov>, "'tadams@idahopower.com'" <tadams@idahopower.com>

bcc

Subject Gateway West DEIS Comment Letter package from Project Proponents: Rocky Mountain Power & Idaho Power Company

To Whom It May Concern:

Please find attached the Gateway West DEIS comment package from the project proponents which consists of:

1. Gateway West – DEIS Comment letter
2. Gateway West – DEIS Review Comments spreadsheet
3. Gateway West – Agency Proposed Mitigation Measures Comments spreadsheet

Regards,

Pam

Pam Anderson, PMP
Project Manager-Gateway West Project
Rocky Mountain Power
Office: 801 220-2481
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GW_DEISCommentLetter_28Oct2011.pdf GW_DEISReviewComments_28October2011.pdf

GW_AgencyProposedMitigationMeasuresComments_28Oct2011.pdf

Rocky Mountain Power and Idaho Power (the Companies) have reviewed the Agency proposed mitigation measures as presented in Table 2.7-1 and within the body of the DEIS. The Companies have previously provided comment to the mitigation measures in conjunction with a data request in September of 2010. The Companies acknowledge that several of the mitigation measures have been revised since that initial review and take this opportunity to provide additional comment. To date, the Companies have already agreed to several of the Agency proposed measures. However there are several measures that the Companies propose alternate language or challenge for reasons including but not limited to the following: 1) the measure is unclear regarding intent or application (i.e. VEG-4); 2) the measure may cause additional unintended impacts (i.e. CR-2); 3) the measure does not provide a benefit that outweighs the significant cost of implementation (i.e. ENV-1); and 4) the measure is beyond common industry practices and sound justification and rationale for implementing the measure is not provided (i.e. LU-1 and TESWL-2).

The following table contains Agency proposed measures only. The Companies will revise and resubmit the Proponent proposed EPMs under a separate submittal after the comment period. The Companies have “coded” the Agency proposed measures using the following for ease of use by the agencies:

- A = Companies accept the measure
- B = No Comment
- C = Reject or challenge measure
- D = Alternate language provided

The table contains the following:

- Agency proposed measure as presented in Table 2.7-1
- Code
- Response (comment and/or proposed revision)

Number	Description	Code	Final Response
Agency Proposed Mitigation Measures			
G-1	Resource Management Plan (as amended) design criteria, Best Management Practices (BMPs) and mitigation requirements will apply on BLM-managed lands.	D	The Proponents propose the following revision: "Resource Management Plan (as of 2011) design criteria, Best Management Practices (BMPs) and mitigation measures that are consistent across Field Office boundaries and with acquired permits will be applied on BLM-managed lands to the extent feasible within engineering and design limitations."
G-2	Forest Plan Standards and Guidelines (as amended) will apply on National Forest System (NFS) lands. Ground disturbing and vegetation management activities will comply with all Agency wide, Regional, and State BMPs.	D	The Proponents propose the following revision: "Forest Plan Standards and Guidelines (as of 2011) will apply on National Forest System (NFS) lands to the extent feasible within engineering and design limitations and as consistent with acquired permits. Vegetation management activities will comply with the memorandum of understanding among Edison Electric Institute member utilities and federal agencies, as well as the best management practices from the International Society of Arboriculture (Miller, 2007)."
VISUAL			
Agency Proposed Mitigation Measures			
VIS-1	No paint or permanent discoloring agents would be applied to rocks or vegetation to indicate limits of survey or construction activity.	A	
VIS-2	To minimize ground disturbance and/or reduce scarring (visual contrast) of the landscape, the alignment of any new access roads or cross-country routes will follow the landform contours in designated areas where practicable, providing that such alignment does not impact resource values additionally.	D	The Proponents propose the following revision: To minimize ground disturbance and/or reduce scarring (visual contrast) of the landscape, the alignment of any new access/service roads or cross-country routes will follow the landform contours in designated areas where practicable, providing that such alignment does not impact resource values additionally or result in new impacts to resources that were previously avoided.The DEIS also needs to identify/define “designated areas”.

Number	Description	Code	Final Response
VIS-3	To minimize sensitive feature disturbance and/or visual contrast, in designated areas structures will be placed so as to avoid sensitive features such as, but not limited to, riparian areas, water courses and cultural sites and/or to allow conductors to clearly span the features, within the limits of standard tower design.	D	The Proponents propose the following revision: "To minimize sensitive feature disturbance and/or visual contrast, in designated areas on federal lands, structures will be placed so as to avoid sensitive features such as, but not limited to, riparian areas, water courses and cultural sites and/or to allow conductors to clearly span the features, within the limits of standard tower design and only if other sensitive or important (e.g., identified by stakeholders) resources are not affected."
VIS-4	To reduce visual impacts on federal land, including potential impacts on recreation values and safety, towers are to be placed at the maximum feasible distance from the highway, canyon and trail crossings within limits of standard design and to the extent practical.	C	This measure requires clarification. it is assumed that it applies to tangent structures however it is unclear. As written it could lead to more angle structures and significant cost increase. The BLM should identify sensitive trail and canyon crossings (for example, specific trails crossings where the trail meets specific criteria [i.e. with intact ruts] and specific canyons) using similar format as presented in VIS-8. Additional information on how a canyon is defined and specific criteria that would be used for identifying canyons (and trail crossings) where this measure could be applicable? Are these key crossings at the Snake River or just any canyon-like feature that is cross? This measure is also covered in VIS-8 and could be removed or combined to avoid redundancy.
VIS-5	Crossings of rivers shall be at approximately right angles where practical. Strategic placement of structures shall be done both as a means to screen views of the transmission line and rights-of-way and to minimize the need for vegetative clearing.	C	The term "river" should be clarified, i.e., what order of river? This is accomplished during design and spotting of towers. This will be accomplished to the extent feasible and within general engineering constraints and common practices. Refer to the Siting Study (Sept 2008). This is not a measure that may be implemented after design has been accomplished.
VIS-6	All insulators shall be made of materials that have reduced potential to reflect and refract light. Glass insulators shall be avoided when there is an alternative insulator type available with lower refractive characteristics.	C	Glass has a distinct advantage over porcelain because they do not fail catastrophically and they are much easier to inspect, although porcelain will have an almost identical insulator length. There are problems with brittle fracture, as well as inspection problems with polymers. There is no way to do an inspection on polymers to determine if you have an insulator that will protect workers doing live-line work. If polymers are selected, you have essentially eliminated the option of performing live-line maintenance for the life of the line. Polymer insulators have to be longer than glass insulators to get the same insulation properties. The increased length will increase the dimensions of the structure

Number	Description	Code	Final Response
			windows and the tower height; this requires more steel and increases structure costs. Polymer insulators are not a direct replacement for porcelain/glass in terms of dimensions.
VIS-7	For segments of the line 1) within the 0- to 0.5-mile zone of Interstate highways where existing lines of the same voltage are paralleled and 2) within the 0- to 0.5-mile zone of residences where existing lines of the same voltage are paralleled, locate new towers to be adjacent to existing towers, within the limits of standard transmission line design and considering the ruling span length of adjacent proposed and existing lines.	B	
VIS-8	Site-specific "micrositing" will be required near certain sensitive areas, as identified by the agencies, where proposed transmission facilities would be present and could impact visual quality; these situations include: • Crossings over major highways; • Crossings of high quality historic trails; • Crossings over the North Platte Snake Rivers; • Crossing the Albion Mountains in the Sawtooth NF; • Sensitive travelways, use areas, residential areas, recreational facilities as identified by the agencies (including national recreation and scenic trails, campgrounds, recreation areas, and trailheads), and other areas identified by management plans; and • Along Forest Service roads in forested areas.	D	The Proponents propose the following revision: "Site-specific "micrositing" (moving a structure in-line with the centerline or within the limits of standard engineering design as to not require additional tangent or angle structures) will be implemented to the extent practicable near certain sensitive areas, as identified by the agencies, where proposed transmission facilities would be present and could impact visual quality; these situations include:" Additional comment: This measure is also covered in VIS-4 and could be removed or combined to avoid redundancy. Micrositing should be defined throughout all measures where it is used. This is accomplished during tower spotting.
VIS-9	In specific areas identified by the applicable federal land manager (such as VRM Class II, erosive soils, steep slopes, areas near NHT Trails) the access road used for construction will be restored and an alternative access route for operations will be designated.	C	Implementation of this measure would result in new and currently unknown impacts that would need to be assessed through the current NEPA process.
VIS-10	In areas in proximity to existing residential developments with an urban or suburban character, such as in the Kuna area, steel pole H-frame tubular steel poles may be specified to provide tower structures that are visually more appealing. Lattice steel towers will need to be specified at turning tower locations and at long spans because tubular steel poles do not have the strength to withstand the forces exerted by the conductors at these locations.	C	The BLM does not have the regulatory authority to require certain structures on non-federal lands.

Number	Description	Code	Final Response
VIS-11	The lighting specified for the marshaling yards shall be the minimum required to meet safety and security standards. All light fixtures within 1,000 feet of a residence shall be hooded to eliminate any potential for glare and to prevent light from spilling off the site or up into the sky. Additionally, the fixtures shall have sensors and switches to permit the lighting to be turned off at times when it is not required.	A	
VIS-12	Where the route would be visible on timbered slopes, limit tree removal to areas required for safety rather than from the entire ROW in order to prevent a linear feature on the landscape from clear-cutting trees. Vegetation removal requirements will consider Appendix A, “Standards and Practices for Electric System Reliability.”	C	This section is inconsistent with the MOU between EEI member utilities and Federal Agencies, and is therefore, unacceptable. The linear nature of the right of way can be mitigated using the wire border zone technique as described in Appendix C. Note that wires at many of the structures will be more than 50 feet off the ground, meaning those areas would be "Region B" as described in Figure 2 of Appendix C. That means border zone species may be allowed over the entire width of the right-of-way near to structures provided the vegetation does not encroach on the structures themselves. The "area required for safety" is the entire ROW. A requirement that we not remove trees in the ROW will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, adversely affect system reliability, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. Secondly, feathering may be accomplished by thinning trees from the right-of-way edge out with agency approvals in some areas. However, trees with a mature height over 25 feet may only be allowed to grow in the ROW where the line is over 100 feet off the ground (considering maximum designed sag). Should specify what document Appendix A is located in as it may be confused with Appendix A of the DEIS.

Number	Description	Code	Final Response
VIS-13	To reduce visual contrast in areas where overstory vegetation is removed for access, tower pads, or conductor clearance, specific sections of the clearing edges on federal land will be feathered to give a natural appearance, where not in conflict with regulatory requirements (e.g., NERC, WECC, and Occupational Safety and Health Administration requirements).	D	The Proponents propose the following revision: "To reduce visual contrast in areas where overstory vegetation is removed for access, tower pads, or conductor clearance, specific sections of the clearing edges on federal land will be feathered (trees thinned/removed from the edge of the right-of-way out or away from the right-of-way boundary) to give a natural appearance, where not in conflict with regulatory requirements (e.g., NERC, WECC, and Occupational Safety and Health Administration requirements). This would be a onetime application and conducted with agency approval."
VIS-14	Crossing federal land along a transmission corridor shall require the preparation of a vegetation management plan for the utility corridor to minimize scenic impacts and plan for rehabilitation of existing impacts. This plan will be approved by the land-management agency prior to vegetation clearing.	C	This should only be required where there are adverse impacts to visual resources, otherwise the reclamation plan will be followed and the Proponents' respective vegetation management plans will be followed. In the event additional plans are required, such plans should be consistent with ANSI A300 Part 7 and Best Practices: Integrated Vegetation Management (2007, Miller, R.H. from the International Society of Arboriculture). "Scenic impacts" should be defined.
VIS-15	To mitigate potential visual impacts on federal land, the construction and maintenance plan to be developed by the Proponents shall include measures to reduce ROW scarring and enhance restoration. The plan will be approved by the land management agency prior to ground clearing and construction.	A	Pertaining to this and all measures that require agency approval (i.e. approval of a plan or process), the BLM should identify and describe the approval process, responsible parties, and timelines within the EIS.
VIS-16	Realignment of a portion of Alternative 1E-B, adjacent to the Rock Creek and Fort Fetterman Road (KOP 993), to follow the rugged terrain and foothills of Smith Mountain should be evaluated to determine absorption effectiveness.	C	This should be conducted as a new route alternative and analyzed between DEIS and FEIS based upon addressing resource conflicts. Visual simulations shall be performed to provide justification for structure selection.
VIS-17	Single-circuit H-frame structures shall be used to reduce visual impact to Fort Fred Steele between MP 38.0 to MP 43.0 for Alternative 2B and MP 18.0 to MP 24.0 for Alternative 2A to match the existing structures.	D	The Proponents propose the following revision: "Single-circuit H-frame structures shall be used to reduce visual impact to Fort Fred Steele between MP 38.0 to MP 43.0 for Alternative 2B and MP 18.0 to MP 24.0 for Alternative 2A to match the existing structures. Lattice steel towers will need to be specified at angle and dead-end locations and at long spans because tubular steel poles are cost prohibitive, potentially have more disturbance area and may result in less visual absorption."

Number	Description	Code	Final Response
VIS-18	If Alternative 7I were to be constructed, H-frame single-circuit structures would be required in the Nevada portion of the alternative as requested by the Wells FO.	C	Table 2.6-3 compares the single-circuit lattice steel tower and single-circuit steel pole H-frame ROW configurations for several factors. While the H-frame 500-kV tangent structure is feasible with significant cost increase, this measure fails to assess and acknowledge that tubular structures would have greater disturbance (more structures per mile) and would likely result in less visual absorption, thereby not satisfying the intent of this measure (addressing visual resources). Use of H-frames at 500kV will likely result in less visual absorption as the H-frames are much bigger than the existing lines and the large dark steel poles that comprise the H-frames are likely to be more visible than the lattice at a medium distance. In addition, Lattice steel towers would need to be specified at turning tower locations, dead-ends and at long spans because tubular steel poles are cost prohibitive, potentially have more disturbance area and may result in less visual absorption.
VIS-19	If any of Alternatives 7H, 7I, or 7J were to be constructed, H-frame single-circuit structures would be required in the Sawtooth NF.	C	Table 2.6-3 compares the single-circuit lattice steel tower and single-circuit steel pole H-frame ROW configurations for several factors. While the H-frame 500-kV tangent structure is feasible with significant cost increase, this measure fails to assess and acknowledge that tubular structures would have greater disturbance (more structures per mile) and would likely result in less visual absorption, thereby not satisfying the intent of this measure (addressing visual resources). Use of H-frames at 500kV will likely result in less visual absorption as the H-frames are much bigger than the existing lines and the large dark steel poles that comprise the H-frames are likely to be more visible than the lattice at a medium distance. In addition, Lattice steel towers would need to be specified at turning tower locations, dead-ends and at long spans because tubular steel poles are cost prohibitive, potentially have more disturbance area and may result in less visual absorption.
CULTURAL			
Agency Proposed Mitigation Measures			
CR-1	(for historic properties in all segments): • Avoid direct impacts by designing the route so that no Project facilities, including access roads, are placed within the boundaries	D	In order to fully adhere to this measure, the Proponents require the results of cultural surveys that have been conducted and will be conducted. The Proponents cannot avoid resources without knowing where they are. The Proponents may more effectively and cost-efficiently avoid

Number	Description	Code	Final Response
	of historic properties. • Assess magnitude and location of adverse effects, should avoidance of historic properties not be feasible.	D	and minimize impact to cultural resources/historic properties by knowing their location. The Proponents request this information be provided to the Proponents as these surveys are completed. In addition, the Proponents propose the following revision: "The Proponents will evaluate the possibility of avoiding cultural resources that are eligible for listing or are listed on the NRHP once the BLM provides this data. Relocating structures and associated facilities to avoid or minimize impacts will be evaluated on a case-by-case basis. Changes in structure and associated facility location will be implemented only if it does not result in the relocation of project features to an area outside of the analysis area (e.g., no new surveys or analysis are required); does not result in increased costs; and does not result in new or additional impacts to other sensitive resources."
CR-2	(for historic trails and other linear routes in all segments): • Design the transmission line to cross where existing modern development occurs. • Cross the resource as close to a 90-degree angle as possible using a dog-leg or S curve. • Adjust tower placement to use the maximum span distance to achieve maximum tower distance from the linear resource.	D C B	The Proponents propose the following revisions: "(for historic trails and linear routes [linear routes should be defined] in all segments where there is an adverse effect determination):" "Design the transmission line to cross where existing modern development occurs to the extent feasible within common engineering design limitations and where permissible." The term "linear routes" needs to be defined to fully assess this proposed measure. The measures proposed here should be

Number	Description	Code	Final Response
	• Avoid paralleling the linear resource as much as possible and obtain maximum tower distance by shifting alignment and maximize topographic screening with lower structures, such as the two single-circuit steel-lattice design alternative.	C	clarified to be utilized only if there is an adverse effect on the resource. Routing the transmission line to cross linear routes "where there is existing development" is largely dictated by local codes and ordinances. Dog-legs or S-curves in a transmission line would require several bulky towers and associated hardware. The author of this measure needs to consider the visual impact of multiple dead-end and angle structures, (with associated insulators and jumpers) on views around historic trail crossings. These tower structure types would be required to build dog-legs or S-curves, and are much more bulky and eye-catching than the inline tangent structures. The dead-end and angle structures are larger due to the added forces induced from pulling the towers in different directions. These design criteria would require more structures compared to straight alignments. Clarification regarding "paralleling" needs to be provided. Avoid paralleling by what distance?
CR-3	Compensatory Mitigation Measures – The BLM, in consultation with the Wyoming, Nevada, and Idaho SHPOs, and consulting parties is developing a PA and a Historic Properties Treatment Plan. Compensatory mitigation measures may be developed as appropriate for specific historic resources. The following example measures may be considered for adversely affected properties, or other measures required:		Burying non-Project related lines may have adverse environmental impact and O&M complications. The cost and complications of implementing such a measure is not commensurate with the perceived impact to the cultural resource. The Proponents may also not own the lines and thus the Owner may not want them buried due to O&M issues. Measures such as this should not be suggested without knowing the feasibility of accomplishing the measure. Appropriate mitigation will be addressed in the HPTP. These measures should be clearly presented as potential measures and not limited to. Mitigation within the HPTP should not be dictated here.
	• Fund or provide interpretive, educational exhibits placed in museums or nearby interpretive centers.	C	
	• Develop an illustrated guide to the regional archaeology and history, which would present the results of the Project's archaeology/history in layperson's terms for the general public.	C	
	• Provide new markers for the BLM and other public groups to position along historic trails, highways, and other linear resources.	C	
	• Fund or provide outdoor, interpretive wayside exhibits along access points to trails, highways, and other linear resources	C	
	• Fund or provide educational films or curriculum for area school districts about the history and significance of the linear resources.	C	

Number	Description	Code	Final Response
	• Acquire or trade land with willing seller(s).	C	
	• Preserve landscapes from a cultural landscape perspective.	C	
	• Bury elsewhere other (non-Project) lower kilovolt transmission or distribution lines.	C	
	• Commission studies of associated historic sites along the corridor to support a regional context.	C	
	• Re-vegetate disturbed areas to protect or restore viewsheds.	C	
	• Provide monetary support to historic trail-related state parks.	C	
CR-4	Conservation Easements – Where feasible and appropriate, conservation easements will be considered to preserve important archaeological and historic sites, and high integrity linear resource segments, or to preserve viewsheds. A conservation easement (sometimes called a conservation covenant) creates a legally enforceable land preservation agreement between a landowner and a government agency (federal, state, county, or municipality) or a qualified land protection organization ("land trust") for the purposes of conservation. It restricts real estate development, commercial and industrial uses, and certain other activities on a property to a mutually agreed upon level. The property remains the private property of the landowner.	B	Appropriate mitigation will be addressed in the HPTP.
CR-5	On NFS lands, a management plan should be developed for each historic property nominated to the NRHP. The plan should be drafted during the nomination process. The National Heritage Strategy should be used to guide decisions on issues related to the Heritage Program.	C	Appropriate mitigation will be addressed in the HPTP.
SOCIOECONOMIC			
Agency Proposed Mitigation Measures			
SOC-1	Housing Plan: Contract with local motels and hotels for temporary accommodation within daily commuting distance of the Project site. Temporary accommodations will be selected based on value, cleanliness, and proximity to the Project site.	C	This will be accomplished by the EPC contractor as per the requirements imposed by the WISC permit. An analysis was conducted by a number of EPC vendors that indicate sufficient housing. Appropriate measures will be taken by the EPC contractor to ensure adequate housing and transportation to and from the Project site.
	• Contract with local RV parks for rental spaces to accommodate workers who have access to RVs.	C	
	• If temporary accommodation is not available within the Project area, seek motel and hotel accommodations outside the Project area. In this event, the Proponents would provide transportation to the Project site in the form of buses or vans, depending on workforce numbers, to ensure workers arrive at the	C	

Number	Description	Code	Final Response
	Project site safely.		
	• If sufficient temporary accommodation is not available, depending on the location and the number of workers involved, the Proponents would explore other temporary housing options, including the use of temporary housing facilities established for other projects, establishing temporary RV lots on public lands, and developing Project-specific temporary housing camps. The Proponents would provide bus or other transportation to the Project site if these facilities were located outside the Project area.	C	
VEGETATION			
Agency Proposed Mitigation Measures			
VEG-1	The Proponents shall consult with each appropriate local land management agency (Forest Service and BLM) office or land owner to determine appropriate seed mix for revegetation. Also see WEED-1.	A	
VEG-2	During construction, blading of native plant communities should be minimized, consistent with safe construction practices. Where feasible, shrubs should be cut at or near ground level to facilitate re-growth after construction. The footprint of construction and operations facilities should be kept to the minimum necessary.	A	
VEG-3	Where feasible, locate new access roads to minimize the number of trees to be removed during construction.	D	The Proponents propose the following revision: "Where feasible, locate new access and service roads to minimize the number of trees removed during construction. Roads will not be relocated if the change would result in an increase in the overall disturbance (acres); additional cut and fill activities, or impact other sensitive resources (e.g., sagebrush plant community, sensitive species habitat, and/or cultural resource or viewshed)."

Number	Description	Code	Final Response
VEG-4	In areas where revegetation would be completed, topsoil salvage and replacement should be used for areas larger than 1 acre where soils would be disturbed during construction. In areas where revegetation would be completed, topsoil salvage will be used in all areas of cut or fill in order to facilitate revegetation.	D	Clarification is needed regarding the 1 acre threshold in order to assess this measure and reduce confusion regarding implementation. Is this applicable to improved access roads and service roads? Because of existing site conditions (e.g., areas with noxious weeds) it may not be appropriate to salvage topsoil. Also, this measure appears to conflict with the first bullet on p.3.6-14 and the Proponents proposed measure in Appendix C-2 (page 6). As such, the Proponents propose the following revision: “In areas where revegetation with the intent to restore habitat would be completed, topsoil salvage and replacement may be used where soils would be disturbed during construction. Generally, topsoil salvage will be used where negotiated with private landowners (e.g., agricultural soils) and where healthy native plant communities occur. The Proponents will also reseed disturbed areas as a BMP (e.g., roads); topsoil will not be salvaged in these areas.”
VEG-5	The Proponents’ employees and contractors will employ typical practices to prevent fire during construction and operations including brush clearing prior to work, stationing a water truck at the job site to keep the ground and vegetation moist in extreme fire conditions, enforcing red flag warnings, providing training to all pertinent personnel, keeping vehicles on designated roads and within work areas, and providing fire suppression and emergency notification numbers at each construction site. Brush clearing will be limited to the construction ROW.	D	By removing discussion of stationing water trucks it allows flexibility and leaves it up to the EPC contractor how this will be accomplished. This measure also appears to conflict with other measures that require minimizing brush clearing. This conflict needs to be addressed to ensure application of intent of such measures is achievable. The Proponents propose the following revision: "The Proponents’ employees and contractors will employ typical practices to prevent fire during construction and operations including brush clearing prior to work, enforcing red flag warnings, providing training to all pertinent personnel, keeping vehicles on designated roads and within work areas, and providing fire suppression and emergency notification numbers at each construction site. Brush clearing will be limited to the construction ROW."
VEG-6	The Reclamation, Revegetation, and Weed Management Plan must provide a site-specific plan for access road and ROW vegetation management in areas where removal of trees is proposed. The site-specific plan must include tree removal, slash disposal plans, and BMPs to avoid erosion or sedimentation of watercourses or wetlands. This plan will be submitted to each applicable land management agency for approval prior to clearing.	C	Clarification is needed regarding access roads. Is this referring to service roads? Trees removal on USFS land will adhere with the conditions of the timber sale and USFS requirements. Through discussion with the USFS for the Caribou, Medicine Bow and Sawtooth NFs, they all had said that additional site specific plans would not be required and that the Proponents vegetation management guidelines in conjunction with the timber sale requirements would be sufficient.

Number	Description	Code	Final Response
VEG-7	Herbicide use must conform to the existing types and application methods approved by those land managing agencies. The Reclamation, Revegetation, and Weed Management Plan must specify where herbicides would be used, what types would be used, and what application methods would be used. The plan must be in conformance with regulations regarding herbicide use from the land-managing agency or county in which herbicide use is proposed.	D	This measure is very similar to REC-5, REC-6 and OM-14. The agency proposed measures could be combined into one measure. Rocky Mountain Power follows IVM Best Management practices, Miller, R.H. from the International Society of Arboriculture - Champaign, IL 2007 regarding application of herbicide. Also, Pesticide Use Proposals are required, which would seem to cover this measure, however, the Proponents propose the following revision: "Herbicide use must conform to the existing types and application methods approved by those land managing agencies. The Reclamation, Revegetation, and Weed Management Plan must specify where herbicides would be used, what types would be used, and what application methods would be used. The plan must be in conformance with regulations regarding herbicide use from the land-managing agency or county in which herbicide use is proposed.
VEG-8	Prior to the start of construction and maintenance activities, all contractor vehicles and equipment (including personal protective equipment) shall be cleaned of soil and debris capable of transporting invasive plant seeds or other propagates. All vehicles and equipment shall be inspected by Agency-approved inspectors and certified as weed free by agency approved personnel, in order to ensure they have been cleaned properly. The final Reclamation, Revegetation, and Weed Management Plan will include the location of all cleaning stations, how materials cleaned from vehicles at these stations would be either captured or treated so that cleaning station locations would not also become infected, and who would confirm/certify that vehicles leaving cleaning stations and/or entering construction sites are free of invasive plant materials.	D	Additional clarification is required to assess this measure. How will inspection be accomplished of all vehicles and equipment by the inspector? The Proponents propose the following revision: "Prior to the start of construction and maintenance activities, all contractor vehicles and equipment shall be cleaned of soil and debris capable of transporting invasive plant seeds or other propagates. Vehicles and equipment used on site shall be randomly inspected and certified as weed free by agency approved personnel, in order to ensure they have been cleaned properly. The final Reclamation, Revegetation, and Weed Management Plan will include the location of all cleaning stations, how materials cleaned from vehicles at these stations would be either captured or treated so that cleaning station locations would not also become infected. "
VEG-9	Agency staff will approve weed-free straw or other erosion control on federal lands prior to application.	C	This measure is vague. How is this accomplished? Paperwork approval or physical inspection? Clarification is needed in order to assess and potentially implement this measure. The DEIS needs to clearly identify the criteria, process, and timelines the agencies will use to approve weed-free straw and other erosion control materials.

Number	Description	Code	Final Response
VEG-10	Agency staff will approve tree seedlings planted in decommissioned roadbeds and other temporarily disturbed areas on federal lands to assure seedlings are matched to site conditions.	D	The DEIS needs to clearly identify the criteria, process, and timelines the agencies will use to approve seedlings. The Proponents propose the following revision: "The Proponents will consult with Agency staff to determine tree seedlings to be planted in decommissioned roadbeds and other temporarily disturbed areas on federal lands (where tree stands were removed) to assure seedlings are matched to site conditions."
VEG-11	The Proponents will consult with appropriate Forest Service staff to identify the top soil layer on NFS lands.	C	The DEIS needs to clearly identify the criteria, process, and timelines the agencies will use to indentify the top soil layer.
VEG-12	Post-construction monitoring and treatment of invasive plants on closed roads and fly yards shall continue for at least 3 years. If after 3 years post-construction conditions are not equivalent or better than pre-construction conditions, monitoring and treatment will continue until these conditions are met.	D	The Proponents propose the following revision: "Post-construction monitoring and treatment of invasive plants on closed service roads (roads dedicated for use by Proponents only) and fly yards shall continue for 3 years. If after 3 years post-construction conditions are not equivalent or similar to pre-construction conditions (in accordance with applicable permit), monitoring and treatment will continue until these conditions are met."
VEG-13	The Proponents will meet Wyoming State Forest Practices Act requirements and apply Region 4 BMPs for timber removal operations on the Medicine Bow NF and meet Idaho State Forest Practices Act requirements and apply Region 2 BMPs for timber removal operations on the Caribou-Targhee and Sawtooth NFs.	D	Proponents propose the following revision based on discussions with NFs: "The Proponents will meet the terms and stipulations within the timber sale contracts for timber removal operations on the Medicine Bow, Caribou-Targhee and Sawtooth NFs."
VEG-14	Where the route would be visible on timbered slopes on lands managed by the Kemmerer FO, allow tree removal only at structure locations and where required for safety rather than from the entire ROW in order to prevent a linear feature on the landscape from clear-cutting trees. Vegetation removal requirements will consider Appendix A, Key Standards Relating to Electric System Reliability and Safety, of the MOU with the Edison Electric Institute (2006).	C	This is completely unacceptable as a mitigation measure and is a direct contradiction to the intent of the MOU cited. The MOU's intent is to perform cover type conversion away from vegetation communities that could interfere with the conductors at some time in their life-cycle toward plant communities that will not. A requirement that we not remove trees except at structure locations will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. If land managers want to prevent linear features we can feather the right of way, as outlined in the last paragraph of Section 3.6.2.2, page 21 for the Medicine Bow-Routt and Caribou-Targhee NFs.

Number	Description	Code	Final Response
TES-PLANTS			
General			
Agency Proposed Mitigation Measures			
TESPL-3	Qualified botanists shall conduct pre-construction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositing of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to land management agency for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the agencies prior to construction.	C	The Proponents will address this measure when the Proponents submit revised proponent-proposed environmental protection measures at a later date.
TESPL-4	Environmental monitors shall be used to identify and mark aboveground populations of slickspot peppergrass and higher-quality microsites within 50 feet of the construction area, including access roads, so that they are avoided by construction equipment and vehicles. Full field clearances shall be conducted that meet USFWS protocols prior to construction. No construction shall occur within 50 feet of any slickspot peppergrass plant or habitat, including known occurrences of slickspot peppergrass (based on Idaho CDC data) even if aboveground plants are not observed during the surveys. Seeding during reclamation must use methods that minimize soil disturbance such as no-till drills or rangeland drills with depth bands, in areas of suitable habitat. Reclamation must use certified weed-free native seed. Excess soils will not be stored or spread on slickspots.	C	The Proponents will address this measure when the Proponents submit revised proponent-proposed environmental protection measures at a later date.
TESPL-6	Sand dune and cushion plant communities should be avoided, where feasible.	A	
Blowout Penstemon			
Agency Proposed Mitigation Measures			
	None proposed		
Goose Creek Milkvetch			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
TESPL-1	Surface disturbance will be allowed in suitable habitat for Goose Creek milkvetch where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted the year prior to construction, and the proposed disturbance areas will be redesigned to avoid direct impacts to populations.	D	The Proponents propose the following revision: "Surface disturbance will be allowed in suitable habitat where species-specific surveys have determined that no populations are present. The species-specific surveys will be conducted prior to construction during the appropriate season, and the proposed disturbance areas will be designed or modified within engineering limitations and standards to avoid direct impact to populations to the maximum extent practicable."
Colorado Butterfly Plant			
Agency Proposed Mitigation Measures			
	None proposed		
Slickspot Peppergrass			
Agency Proposed Mitigation Measures			
	None proposed		
Ute Ladies'-tresses			
Agency Proposed Mitigation Measures			
TESPL-2	Pre-construction surveys for the Ute ladies' tresses shall be conducted by qualified botanists in all areas of potential habitat, in accordance with federal land management agency and USFWS requirements. These pre-construction surveys shall be conducted during the appropriate survey window, for a total of 3 years.	D	Proponents propose the following revision: "Pre-construction surveys for the Ute ladies' tresses shall be conducted by qualified botanists in all areas of potential habitat, in accordance with federal land management agency and USFWS requirements. These pre-construction surveys shall be conducted during the appropriate survey window, for a total of 3 years; where right of entry and landowner permissions are obtained."

Number	Description	Code	Final Response
TESPL-3	Qualified botanists shall conduct pre-construction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositing of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations must be provided to land management agency for approval prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions. Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction.	D	The Proponents propose the following revision: "Qualified botanists shall conduct pre-construction surveys during a season when target species are readily identifiable for special status or globally rare species. Where feasible, micrositing (moving a structure in-line with the centerline or within the limits of standard engineering design as to not require additional tangent or angle structures) of project facilities shall avoid direct impacts to identified populations. Survey reports documenting the surveys, their results, and recommendations shall be provided to land management agency prior to construction. Agency botanists may evaluate individual sites based on site-specific conditions within 20 days of receiving the report. Documentation of avoidance of impacts to sensitive and globally rare plants must be provided to the agencies prior to construction. Such plants may be impacted if the USFWS authorizes take in the BO."
Whitebark pine			
Agency Proposed Mitigation Measures			
TESPL-5	If a whitebark pine or limber pine (a similar species that can be difficult to distinguish from whitebark pine) stand cannot be avoided, off-site mitigation in the form of appropriate silvicultural treatments of adjacent stands, collection of seed, identification of “plus” trees or other acceptable mitigations will be done to offset the loss of the stand in addition to replanting whitebark pine on reclaimed areas.	D	The Proponents propose the following revision: "If a whitebark pine or limber pine (a similar species that can be difficult to distinguish from whitebark pine) stand cannot be avoided, off-site mitigation in the form of appropriate silvicultural treatments of adjacent stands, collection of seeds from agency identified "plus" trees, or other acceptable mitigations will be done to offset the loss of the stand."
WEEDS			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
WEED-1	The Proponents shall consult with each appropriate local land management agency (Forest Service and BLM) office or landowner to determine appropriate seed mix and commercial seed source for revegetation. The Reclamation, Revegetation, and Weed Management Plan must specify the approved seed mixes for each area (also see VEG-1).	D	The Proponents propose the following revision: "The Proponents shall consult with each appropriate local land management agency (Forest Service and BLM) office or landowner to determine appropriate seed mix and commercial seed source for revegetation. The Reclamation, Revegetation, and Weed Management Plan shall specify the approved seed mixes for federal lands and be updated with seed mixes for use on private lands as they are identified through landowner negotiations and discussions (also see VEG-1)."
WEED-2	Weed control and prevention measures shall adhere to all agency standards and guidelines. These measures shall be developed in consultation with local, state, and federal weed agencies; all implemented measures would follow the principle of integrated weed management.	B	
WEED-3	Gravel and other materials used for road construction on federal lands shall come from certified weed-free sources.	C	The feasibility of acquiring all materials used in road construction as certified weed-free is not known. This will be implemented to the extent feasible and practicable.
WEED-4	Annual post-construction monitoring and treatment of invasive plants shall continue for at least 3 years. If after 3 years post-construction conditions are not equivalent or better than pre-construction conditions, monitoring and treatment will continue until these conditions are met (also see VEG-12).	D	The Proponents propose the following revision "Annual post-construction monitoring and treatment of invasive plants shall continue for 3 years in areas where infestations or large population of noxious weeds have been identified. If after 3 years post-construction conditions are not equivalent or similar to pre-construction conditions (in accordance with applicable permit), monitoring and treatment will continue until these conditions are met (also see VEG-12). If adjacent land uses are contributing to the introduction and/or persistence of invasive plant species within areas disturbed by the project, then Proponents will not be required to treat noxious weeds for more than three years."

Number	Description	Code	Final Response
WEED-5	During operations, access roads and maintenance areas shall be surveyed annually between May 1 and September 30 (or as determined by Agency staff) for the presence of new weed introductions and existing invasive plant species. Coordinate with Agency specialists to identify the most appropriate time for survey. A weed control program would be implemented if new weeds were found, which would define how and when these invasive plants would be treated. Weeds shall be treated before their seed heads have become viable, or if heads will become viable, whole plant removal of all weeds shall occur before seed drop occurs.	C	WEED-4 with Proponents revisions satisfy this. Annual survey and weed control of access roads (which are utilized by other entities in addition to the Proponents) is something the Proponents are not willing to undertake as issues (weed infestations) could arise due to other entities actions. Cost is greater than benefit. This measure is open ended.
WEED-6	Soil stockpiles in areas containing invasive plants shall be reseeded or revegetated as soon as feasible, or the soil replaced in or near the original excavation. If requested by the applicable land-management agency, soil stockpiles shall be covered with plastic during the time prior to reseeding or replacement; however, plastic coverings will not be used on lands where the managing agency or landowner have requested that these piles not be covered with plastic (e.g., the Forest Service).	D	Because reseeding or covering soil stockpiles may not be practicable or appropriate in all cases, the Proponents propose the following revision: "Soil stockpiles in areas containing noxious weeds and invasive plant species shall be kept separate from soil removed from areas that are free of noxious weed and invasive plant species, and the soil will be replaced in or near the original excavation. If requested by the applicable land-management agency, soil stockpiles shall be covered with plastic if the soil stockpile will be in place for two weeks or more and is not being actively used. On lands managed by the Forest Service or per private landowner request, stockpiles will not be covered with plastic."
VEG-7	See description under Vegetation.		
WETLANDS			
Agency Proposed Mitigation Measures			
WET-1	Impacts on wetland and riparian areas shall be avoided unless physically or economically infeasible. Land management agencies' plans (RMPs and Forest Plans) that have standards, guidelines, stipulations, or avoidance buffers will be adhered to. Where these do not exist, Inland Fish Strategy (INFISH) buffers for fish-bearing and nonfish-bearing waters and wetlands will be followed.	C	In order to fully assess this measure, the INFISH buffers must be provided to the Proponents. Proponents intend to have permanent access to every structure (Appendix B, page B-22). This measure may conflict with this need and therefore would not be feasible.
WET-2	Wetland delineations will be performed prior to construction to support CWA Section 404 permitting and to minimize Project impacts. The delineation will identify both wetland and non-wetland waters of the United States that would be affected by the Project.	A	

Number	Description	Code	Final Response
WET-4	To meet USACE requirements for CWA 404 permitting, the Proponents must submit a plan for mitigation and full compensation for all losses of waters of the United States. This plan must be approved by the USACE. The framework for this plan is included in the Draft EIS (see Appendix C-6) and must be fully detailed for the Final EIS.	D	The Proponents propose the following revision: "To meet USACE requirements for CWA 404 permitting, the Proponents will submit a mitigation plan that is accepted by the USACE. The framework for this plan is included in the Draft EIS (see Appendix C-6)."
Agency Proposed Mitigation Measures Adopted by the Proponents			
WET-3	Where impacts on wetlands are not avoidable, site-specific crossing plans and measures to mitigate impacts shall be submitted to the appropriate regulatory agency, as well as the land managing agency. The Proponent shall apply directly to the appropriate permitting agency (USACE and/or State agency) for approval.	D	The Proponents propose the following revision: "Where impacts on wetlands are not avoidable, site-specific crossing plans and measures to mitigate impacts shall be submitted to the appropriate regulatory agency, as well as the land managing agency. The Proponent shall obtain all necessary permits prior to discharging dredged or fill material to waters of the U.S. and state."
Fish			
Agency Proposed Mitigation Measures			
FISH-1	On BLM-managed land, all culverts, whether temporary or permanent, must be designed to meet BLM Manual 9113 standards. Culverts should be located, designed, constructed, and maintained according to standards that preserve or improve streambed gradients and velocities to allow fish passage and that minimize erosion and sediment damage. On federal lands, unless the applicable management plan has specific requirements for stream crossings, use the following for culverts in channels with less than 3 percent slope:	C	In order for the Proponents to determine the feasibility of this measure, the Proponents request the BLM to provide a list of measures within manual 9113 that apply. In the event that the measures within manual 9113 are identified in this measure, the measure should be revised to clearly state this.
	• The minimum culvert width shall be equal to or greater than 1.5 times the active channel width.	C	
	• The culvert shall be placed level (zero percent slope).	C	
	• The bottom of the culvert shall be buried into the streambed at not less than 20 percent of the culvert height at the outlet, and not more than 40 percent of the culvert height at the inlet. Embedment does not apply to bottomless culverts.	C	

Number	Description	Code	Final Response
	At sites where the channel slope is greater than 3 percent, additional consideration should be given to alternate design options such as bottomless arch culverts or fords (low-water crossings). This is because of the difficulty of providing for the passage of aquatic species through culverts installed at these sites. Also, the culvert would be installed so that its slope would match the average grade of the stream immediately up- and down-stream of the culvert site. Follow RMP guidelines where specific requirements are included. On NFS lands, Forest Plan standards and guidelines shall apply.	C	
FISH-2	All in-stream construction actions will be conducted when critical fish life stages can be avoided as designated by the appropriate state and federal agencies. All culverts placed in fish habitat will be suitable, as determined by the federal or state agency, for passage by all life stages present or potentially present within the stream reach. Riparian vegetation removal should be kept to the minimum along fish bearing streams. Blasting in or adjacent to fish-bearing streams will require the state fish agency approval prior to blasting. Channel morphology data (e.g., streambank composition, bank slope, stream substrate characteristics, stream slope, riparian vegetation characteristics) will be obtained anywhere a road will cross a stream prior to construction and be used to restore the site of the crossing to pre-Project conditions when temporary roads are decommissioned.	C	The DEIS should clearly identify in-stream construction periods by waterbody. How will the agencies determine "suitable"? Also, rationale as to why blasting adjacent to fish-bearing streams is an impact should be included in the EIS. Collecting morphology data for all road crossings is not warranted (i.e. for permanent crossings). The Proponents will not collect morphology data as suggested in this measure.
FISH-3	When taking water from TES fish-bearing streams for road and facility construction and maintenance activities, intake hoses shall be screened with the most appropriate mesh size (generally 3/32 of an inch), or as determined through coordination with NMFS and/or USFWS.	A	
FISH-4	If an aquatic invasive species is discovered during surveys for wetlands and waters of the U.S. conducted for USACE and state permitting prior to construction, the waterbody will be flagged and noted on the construction drawings. After work is complete in that waterbody, any equipment involved in construction in that waterbody must be washed to remove any propagules of aquatic invasive species and to prevent the spread of those species to other waterbodies in the Analysis Area.	A	
WILDLIFE			
General			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
WILD-1	Requests for exceptions from closure periods and areas must be submitted by the Proponents to the appropriate land management agency office in which the exception is requested. Established exception processes on federally-managed lands must be followed. The appropriate agency, or a contractor chosen by the Proponents and approved by the agency, shall conduct any surveys and coordinate with any other agencies as necessary. Factors considered in granting the exception include animal conditions, climate and weather conditions, habitat conditions and availability, spatial considerations (e.g., travel routes and landscape connectivity), breeding activity levels, incubation or nestling stage, and timing, intensity, and duration of the Proposed action. Requests must be submitted in writing no more than 2 weeks prior to the proposed commencement of the construction period, to ensure that conditions during construction are consistent with those evaluated. The authorized officer, on a case-by-case basis, may grant exceptions to seasonal stipulations, and has the authority to cancel this exception at any time.	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
WILD-12	Any areas that may require blasting will be identified and a blasting plan will be submitted to the appropriate agency for approval. Blasting within 0.25 mile of a known sensitive wildlife resource will require review and approval by the appropriate agency.	C	DEIS needs to clearly identify process, criteria for a decision, timeline.
WILD-5	Surveys will be conducted within 0.5 mile of the route prior to construction for caves, abandoned mines, and adits. If suitable bat roosts are identified, the Proponents will consult with the applicable land management agency to determine appropriate protective measures.	C	This is onerous and costly in comparison to the benefit. Also, the DEIS provides no justification for the 0.5 mile area. Please provide a discussion of potential impacts and literature citations that support this requirement.
Big Game			
Agency Proposed Mitigation Measures			
WILD-2	Vehicular speeds during construction and operation shall be limited to 25 mph on all unsurfaced access roads. Crew and vehicle travel will be restricted to designated routes while on federally designated big game winter range (except for areas within the ROW).	A	
WILD-1	See description under General Wildlife.		
Raptors			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
WILD-4	On federal lands, accurate monitoring, including identifying nest occupancy, shall be conducted in order to ensure that raptor nests are located in advance of any construction activities. This would be needed to ensure that all construction activities would cease in areas near active nests. Biological monitor on site would perform these surveys ahead of construction. If an occupied nest is found, the appropriate restrictions and closures would be adhered to. All encounters of nesting raptors in the Analysis Area must be reported to the biological monitor and to appropriate agencies.	D	The Proponents propose the following revision: "Pre-construction nest surveys will be conducted in suitable habitat to identify raptor nest locations and status of previously identified raptor nests. Appropriate buffers will be applied to active nests during construction and the Proponent-proposed EPMs would be followed." On federal lands, pre-construction surveys would be conducted in suitable habitat to identify raptor nests. If an occupied nest is found, the Company-proposed EPMs would be followed.
WILD-1	See description under General Wildlife.		
WILD-6	As part of their annual aerial flight line maintenance activities, the Proponents will document perching and nesting activity (by species) on any towers constructed as a result of this Project. This would occur after the first year of construction until year 10 of operations. Results would be provided to the applicable land-management agency.	C	This is onerous and cost is not commensurate with any benefit. The reason for doing this is not clear in the DEIS.
WILD-7	On federal lands, guy wires should be marked with bird deterrent devices to avoid avian collisions with structures on public lands (I.M. 2010-022).	C	IM 2010-022 addresses guy wires associated with fences and wind energy structures (MET towers and turbines). Implying that it applies to transmission towers is disingenuous. Moreover, the BLM has provided no evidence that guy wires associated with transmission towers present a significant risk to SAGR. Marking all guy wires is unlikely to be efficient and an unnecessary expense. We suggest that areas where species are present that may be impacted by the presence of guy wires should be prioritized. Where such species are not present marking of guy wires should not be required. The DEIS identifies some areas where marking of guy wires would be useful, such as river crossings. The BLM should carefully evaluate and determine which areas require marking of guy wires, rather than applying this requirement universally to all towers.

Number	Description	Code	Final Response
WILD-8	Flight diverters will be installed and maintained where the transmission line crosses rivers at the locations identified in Table 3.10-3. The flight diverters will be placed on at least one of the higher conductors or ground wires at each crossing in order to reduce avian collisions. Additional locations may be identified by the Agencies.	D	The Proponents propose the following revision: "Flight diverters will be installed and maintained where the transmission line crosses rivers at the locations identified in Table 3.10-3. The flight diverters will be placed on at least one of the higher static wires at each crossing in order to reduce avian collisions. Flight diverters will be installed on no more than one span either side of the span that crosses the river. Additional locations may be identified by the Proponents in accordance with their respective Avian Protection Plans and USFWS agreements."
WILD-3	The Project shall be designed and constructed in compliance with Avian Power Line Interaction Committee standards (APLIC 2006) in order to reduce impacts to avian species. Any changes to the Project's design, as requested by federal, state, or local jurisdictions, as well as any changes considered by the Proponents should also be in compliance with Avian Power Line Interaction Committee standards.	A	
Agency Proposed Mitigation Measures Adopted by the Proponents			
WILD-9	Pre-construction pedestrian or aerial surveys will be completed during the appropriate nesting time periods needed to identify each raptor species. The Proponent will provide survey results to the authorized officer for approval (see WILD-1).	D	This measure is similar to WILD-4 and could be combined with that measure, however, the Proponents propose the following revision: "Pre-construction pedestrian or aerial surveys will be completed during the appropriate nesting time periods needed to identify active raptor nests. The Proponent will provide survey results to the authorized officer."
Within Antelope Fawning Areas			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Antelope Critical Winter Range			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Bighorn Sheep Lambing Grounds			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Bighorn Sheep Critical Winter Range			

Number	Description	Code	Final Response
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Bighorn Sheep Year-long Habitat			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Elk Calving Areas			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Elk Critical Winter Range			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Moose Calving Areas			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Moose Critical Winter Range			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Mule Deer Fawning Areas			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Within Mule Deer Critical Winter Range			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Golden Eagle			
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
All Other Raptors			

Number	Description	Code	Final Response
Agency Proposed Mitigation Measures			
WILD-1	See description under General Wildlife.		
Migratory Birds			
Agency Proposed Mitigation Measures			
WILD-10	To the extent feasible, all vegetation clearing would be conducted prior to the onset of the avian breeding season (generally April 15 through July 31, depending on local conditions and federal land management plan requirements), in order to limit the potential impact of clearing on nesting birds. In addition, pre-construction surveys within the disturbed portion of the ROW and extending a minimum of 30 feet on either side of the ROW shall be conducted. If an active nest is found during pre-construction surveys, the nest will be identified to species, flagged and avoided until any young have fledged. Avoidance distances are species-specific and must be approved by a USFWS-approved biologist.	D	This measure significantly lessens the feasibility of constructing the Project given the temporal and spatial restrictions. The Proponents conduct annual MBTA internal training addressing concerns raised in this measure and in order to ensure compliance with MBTA. The Idaho State BLM has recently found this training (Idaho Power training) acceptable as providing a mechanism for compliance with MBTA. Also, the BLM must provide avoidance distances in the DEIS in order for the Proponents to evaluate and comment on them. The Proponents propose the following revision: "The Proponents shall ensure that all field personnel receive MBTA training including training regarding nesting habitats (i.e. identifying cavities that may support nesting birds) which will describe requirements such as halting activities adjacent to nesting birds and mark/flag the area until the young have fledged."
WILD-11	Snags shall be maintained to the extent practical along the outer portions of the Project's ROW in order to reduce the impacts to habitat for cavity nesters.	D	The Proponents propose the following revision: "Snags shall be maintained to the extent practical and where it does not conflict with the Proponents vegetation management specifications along the outer portions of the Project's ROW in order to reduce the impacts to habitat for cavity nesters."
WILD-3	See description under Raptors.		
TES-WILDLIFE			
Agency Proposed Mitigation Measures			
FISH-3	[See description under Fish]		
WILD-3	[See description under Wildlife]		
TESWL-1	For the protection of aquatic and riparian/wetland dependent species, surface disturbing and disruptive activities should be avoided in the following areas: 1) identified 100-year floodplains; 2) areas within 500 feet of perennial waters, springs, wells, and wetlands; and 3) areas within 100 feet of the inner gorge of ephemeral channels on federally managed lands.	C	In order to fully assess this measure, citations for the 500 foot and 100 foot "buffers" need to be provided and justified. In order to maximize tower distance from such areas, the conductor sag will be greatest and thereby require more intensive vegetation clearing than otherwise in order to maintain clearances. The Companies have avoided to the

Number	Description	Code	Final Response
	Where it is not possible to avoid wetland and riparian habitat, crossing-specific plans must be developed. These plans shall: 1) demonstrate that vegetation removal is minimized; 2) show how sediment would be controlled during construction and operation within wetland and riparian areas; 3) attempt to intersect the wetland or riparian habitat at its edge; and 4) provide measures to restore habitat and ensure conservation of riparian microclimates. This plan must be submitted to the appropriate land management agency and approved prior to construction of any portion of the Project within sensitive riparian habitat.	C	extent practicable impacts to aquatic and riparian/wetland dependent species. Please see the response regarding indicative and engineering design for more details. The information required to comply with 1-4 will be provided in the POD; application(s) to the U.S. Army Corps of Engineers, and/or construction storm water plans. It is not clear how a Proponent can preserve microclimate.
TESWL-2	The Proponents shall work with the applicable land-management agencies to develop a survey protocol that would be conducted in conjunction with annual operations and maintenance surveys (as outlined in the Proponent's Avian Protection Plans). The goal of these raptor-raven surveys shall be to identify whether populations of raptors and ravens are consolidating along the Project, and will be done during the appropriate time of year. These surveys shall be conducted, at a minimum, along portions of the line that are located within 1 mile of identified concentrations of sensitive raptor and raven prey species (including the black-footed ferret, mountain plover, burrowing owl, grouse species, as well as white- and black-tailed prairie dogs). The Proponents and applicable land-management agencies shall work together to identify measures to limit predation rates on sensitive species within areas where raptor and raven populations are considered to be consolidating (limited to areas near sensitive species).	C	Considering prudent use of rate payers money, this is an onerous and unwarranted measure. This would require the Proponents to hire a consultant to conduct annual surveys for hundreds of miles of transmission line. The perceived benefit does not clearly outweigh the cost of implementing such a measure. There appears to be a fundamental misunderstanding of the Proponents' APPs as annual surveys of lines are not conducted for this purpose. The transmission line would not be surveyed annually under the provisions of the APPs; such surveys are beyond the scope of an APP (refer to the APP Guidelines). Regarding sage-grouse predation, there are no scientific correlations to tall structures which justify the use of anti-perching devices (see the UWIN literature review regarding tall structures and sage-grouse).

Number	Description	Code	Final Response
TESWL-3	H-frame structures shall be equipped with anti-perch devices to reduce raven and raptor use, and limit predation opportunities on special status prey species.	C	Considering prudent use of rate payers money, this is an onerous and unwarranted measure. H-frame in comparison to lattice structures inherently reduce and minimize raptor perching and nesting opportunities. Rocky Mountain Power currently has agreements with the FWS (Office of Law Enforcement) to not use anti-perch devices as they have been shown to be ineffective and increase potential for electrocution and nesting. This requirement conflicts with the working agreements with the FWS. Also, anti-perching devices when used at high voltages specifically pose maintenance and safety risks as they would require to be maintained "hot". Regarding sage-grouse predation, there are no scientific correlations to tall structures which justify the use of anti-perching devices (see the UWIN literature review regarding tall structures and sage-grouse).
Black-footed Ferret			
Agency Proposed Mitigation Measures			
TESWL-4	In the event that an ESA listed species is discovered during surveys, construction would cease, the USFWS would be notified, and Section 7 consultation would be initiated. In addition, the transmission line or structures would be relocated to minimize direct impacts to newly discovered ESA species, to the extent practical.	C	Since the BLM is already doing section 7 consultation it is not clear what this measure is trying to accomplish. Is this measure intended to address previously unknown species? Moreover, if the BO provides for take, this measure may not be consistent with what is in the BO. This should be worked out with FWS now. There should be an agreement and procedures in place.
TESWL-5	Pre-construction surveys must be conducted for the black-tailed prairie dog (in addition to those already proposed for the white-tailed prairie dog and the black-footed ferret) in Segments 1E and 1W. If prairie dogs or their habitat are documented, then surveys for black-footed ferrets must occur. If black-footed ferrets are found, construction in that area must halt and consultation with the USFWS be initiated.	C	Since the BLM is already doing section 7 consultation it is not clear what this measure is trying to accomplish. Is this measure intended to address previously unknown species? Moreover, if the BO provides for take, this measure may not be consistent with what is in the BO. This should be worked out with FWS now. There should be an agreement and procedures in place.
	If black-tailed prairie dogs are discovered during construction, all construction activities must cease and a survey for the black-footed ferret shall be conducted. If black-footed ferrets are found, construction in that area must halt and consultation with the USFWS would be re-initiated.	C	
Bald Eagle Active Nests			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
TESWL-6	Requests for exceptions from bald eagle closure periods and areas must be submitted by the Proponents to the appropriate land-management agency office in which the exception is requested. Established exception processes on federally managed lands must be followed (see WILD-1).	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
Bald Eagle Winter Roosts			
Agency Proposed Mitigation Measures			
	None proposed		
Ferruginous Hawk			
Agency Proposed Mitigation Measures			
TESWL-20	Requests for exceptions from ferruginous hawk closure periods and areas must be submitted by the Proponents to the appropriate land-management agency office in which the exception is requested. Established exception processes on federally managed lands must be followed (see WILD-1).	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
Flammulated Owl			
Agency Proposed Mitigation Measures			
TESWL-21	Requests for exceptions from northern goshawk closure periods and areas must be submitted by the Proponents to the appropriate land-management agency office in which the exception is requested. Established exception processes on federally managed lands must be followed (see WILD-1).	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
Northern Goshawk			
Agency Proposed Mitigation Measures			
	None proposed		
Pygmy Rabbit			
Agency Proposed Mitigation Measures			
	None proposed		
Wyoming Pocket Gopher			
Agency Proposed Mitigation Measures			
	None proposed		
Burrowing Owl			

Number	Description	Code	Final Response
Agency Proposed Mitigation Measures			
TESWL-7	Requests for exceptions from burrowing owl closure periods and areas must be submitted by the Proponents to the appropriate land-management agency office in which the exception is requested. Established exception processes on federally managed lands must be followed (see WILD-1).	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
TESWL-8	A wildlife biologist will accompany site engineers during the final engineering design, in order to verify and flag the location of any known occupied structures (e.g., nests, burrows, colonies) utilized by sensitive species. This will include, but not be limited to, known burrowing owl burrows (including artificial burrows that have been constructed as part of research/restoration efforts), prairie dog colonies, and raptor nests, which could be impacted by the Project based on the indicative engineering design. The final engineering design will be routed to avoid direct impact to these occupied structures to the extent practical.	C	This is onerous. Pre-construction surveys will be conducted by a qualified wildlife biologist, areas will be avoided during design phase and monitoring of resources will be conducted during construction.
Sharp-tailed Grouse			
Agency Proposed Mitigation Measures			
TESWL-9	Requests for exceptions from Columbia sharp-tailed grouse closure periods and areas must be submitted by the Proponents to the appropriate land-management agency office in which the exception is requested. Established exception processes on federally managed lands must be followed (see WILD-1).	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
TESWL-10	Proponents shall provide the Agencies a list of the protocols that the Proponents would use during greater sage-grouse and sharp-tailed grouse pre-construction surveys. The Agencies shall either approve these protocols, or suggest alternative protocols to be used.	B	
TESWL-11	In areas where sharp-tailed grouse leks occur in proximity to greater sage-grouse leks, surface disturbance shall be avoided within 4 miles of occupied or undetermined greater sage-grouse leks from March 1 to July 15. In areas where sharp-tailed grouse leks occur in isolation from greater sage-grouse leks, surface disturbance shall be avoided within 1.2 miles of occupied or undetermined sharp-tailed grouse leks from March 15 to July 15.	C	The BLM should clarify “proximity” and provide rationale for 1.2 miles and 4 miles. This measure in inconsistent with resource management plans that allow for construction to take place (within distances proposed in this measure) with the exception of early morning and early evening hours; typically allow construction to take place from 9am to 4pm.
Mountain Plover			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
TESWL-12	Requests for exceptions from mountain plover closure periods and areas must be submitted by the Proponents to the appropriate land management agency office in which the exception is requested. Established exception processes on federally-managed lands must be followed (See WILD-1).	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
Three-toed Woodpecker			
Agency Proposed Mitigation Measures			
	None proposed		
Columbia spotted frog			
Agency Proposed Mitigation Measures			
TESWL-1	See the description under TES Wildlife above		
Yellow billed cuckoo			
Agency Proposed Mitigation Measures			
TESWL-13	A pre-construction survey for the yellow-billed cuckoo must be conducted at any proposed crossing of suitable habitat. If these birds are detected within 1 mile of the centerline (within existing habitat), construction must not occur until the young have fledged or the nest is abandoned. The crossing-specific plan must contain proposed monitoring measures to assure compliance with this measure.	C	According to the DEIS, there is less than 0.1 mile of suitable yellow-billed cuckoo habitat within the entire Project (p. 3.11-34). The proposed mitigation measures and requirements are ludicrous for the level of potential impact for the species. The yellow-billed cuckoo's tendency to collide with transmission structures is uncertain. However, it is likely limited due to their preference for dense riparian habitats, which indicates that they are adapted to negotiating around obstacles while in flight, and would not typically fly into open areas where conductors or transmission towers would be located.
Midget faded rattlesnake			
Agency Proposed Mitigation Measures			
TESWL-18	Pre-construction surveys for occupied or potential midget faded rattlesnake hibernacula (i.e., rock outcrops with south to east aspect) will be conducted.	C	This measure is vague and requires clarification as to why surveys would be conducted. Additional description in the DEIS is needed regarding range of the species. The BLM should provide protocol for identifying hibernacula.
Sage-Grouse			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
TESWL-14	Surface disturbance shall be avoided within 0.6 to 4 miles of occupied or undetermined greater sage-grouse leks from March 15 to July 15 in all portions of the Project except for Nevada. In Nevada, surface disturbance shall be avoided within view of or within 0.3 mile of all leks from March 1 to May 15; and within areas designated by Nevada as greater sage-grouse brood rearing areas from May 15 to August 15..	C	The Proponents do not need to be consistent with the Wyoming EO in Idaho. It is not possible to construct the project the project with such restrictions. Also, the Proponents must consider not applying/following distance stipulation on non-federal lands in order to construct the project when factoring in all of the restrictions.
TESWL-15	There shall be no surface occupancy (NSO) within 0.6 mile of the perimeter of occupied greater sage-grouse leks. "No surface occupancy," as used here, means no surface facilities, including roads, shall be placed within the NSO area. Other activities may be authorized with the application of appropriate seasonal stipulations, provided the resource's protected area is not adversely affected.	C	This measure is not possible to comply with. See text on p. 3.11-64. "However, not all leks could be avoided by this distance (see Table 3.11-4) due to the need to avoid other sensitive resources (e.g., high-altitude mountain habitats that contain species listed under the ESA, or sensitive cultural resources that are protected by the various SHPOs)."
TESWL-16	Requests for exceptions from greater sage-grouse closure periods and areas must be submitted by the Proponents to the appropriate land management agency office in which the exception is requested. Established exception processes on federally-managed lands must be followed (See WILD-1).	D	The Proponents shall submit a revised plan addressing Proponent proposed EPMs including exceptions and monitoring. A proposed rewrite of this measure will be included at that time.
TESWL-19	There shall be no surface disturbances within areas designated as Winter Concentration Areas for the greater sage-grouse from November 1 through March 15.	C	The DEIS should clearly identify known winter concentration areas in order to assess this measure. Currently known concentration areas could only be considered and additional survey should not be required of the Proponents.
TESWL-22	No structures that require guy wires would be used in occupied sagebrush obligate habitats within the area managed under the Kemmerer RMP.	C	This measure eliminates the use of several optional structure types (guyed vee, tubular h-frame other than at tangent structures, etc.). There may be distribution lines that use guys, (i.e. a distribution line that goes to a regeneration site).
TESWL-23	If the Kemmerer RMP is amended to allow Alternatives 4A, 4C, 4E, or 4F to be selected, existing fences within 1 mile of the portion of the Gateway West Project located on lands managed by the Kemmerer RMP shall be modified with FireFly Grouse Flight diverters (or a similar product) in order to prevent greater sage-grouse mortalities. Additional site-specific reclamation, such as transplanting sagebrush seedlings within previous disturbed habitats, may also be required to off-set the net loss of sagebrush habitats within the Rock Creek/Tunp management area.	C	Appropriate mitigations for impacts to sage-grouse will be implemented an identified through negotiations during the NEPA process.
Colorado River T&E Fishes			
Agency Proposed Measures Adopted by the Proponents			

Number	Description	Code	Final Response
TESWL-17	A payment of a one-time fee, based on a fee schedule provided by the USFWS, shall be made based on the amount of water used during construction of any segments that cross the Colorado River system.	A	
MINERALS			
Agency Proposed Mitigation Measures			
MN-1	A geotechnical investigation will be conducted by the Proponents in areas where abandoned underground mines are known to occur to determine the presence of methane and the likelihood of subsidence.	C	The recommendation from engineering is that a field investigation should not be done. Finding anomalies that result in methane or subsidence is like trying to find a needle in a haystack. Trying to find these by punching holes with an eight inch auger is not recommended. Engineering recommends that the geotechnical investigation be a desktop survey to identify and document the areas where abandon mines exist.It would ultimately be up to the EPC contractor to mediate these conditions if they are discovered during construction. This desk top survey would help identify those areas that the contractor may want to do additional analysis as part of final design and construction.
MN-2	An accounting of damages will be conducted by the Proponents to current operators to determine the potential loss of mineral resources. There may be mining claims under the 1872 Mining Law that would have precedence over the Project. Similarly, federal and state mineral lease agreements provide rights to lessees that could interfere with the Gateway West Project. The Proponents will resolve mineral claim and lease agreements prior to Project initiation, as with site access agreements on private property.	C	Stipulation or requirement: does not seem to be a mitigation measure; covered in easement agreements (we relocate at our own expense or purchase the right). This is not a mitigation measure as RMP does identify mining activity and rights during the title search done prior to ROW acquisition. RMP investigates each one and resolves any concerns at that time. This process includes analysis of risk, and potentially, condemnation if resolution is not possible.
PALEONTOLOGICAL RESOURCES			
Agency Proposed Mitigation Measures			
PALEO-1	The Proponents shall prepare a Paleontological Monitoring Plan for the Project, focusing on Segments 4, 7, 8, and 9 where the potential for adverse impacts is the greatest. This plan shall be submitted to appropriate agencies for review and approval prior to commencing construction. The plan should specify that:	D	The phrase "Significant Potential" should be defined. The Proponents propose the following revision: "The Proponents shall prepare a Paleontological Monitoring Plan (Discovery Plan) for the Project, for areas within Segments 4, 7, 8, and 9 where the potential for adverse impacts is the greatest

Number	Description	Code	Final Response
	• Monitoring of excavation and grading in sensitive sediments, especially access roads and tower sites, must occur when construction is near or in those geologic formations.	D	(based on the known current potential fossil yield classification [class 3, 4, or 5] for formations within these segments). This plan shall be submitted to appropriate agencies for review and approval prior to commencing construction. The plan shall include discussion regarding implementation of monitoring (visual monitoring and inspection) at site specific locations in sensitive geologic formations with known high potential to contain significant paleontological resources (rare fossils)."
	• Monitoring of excavations in sensitive sediments, screening the excavated spoils, and processing of bulk sediment samples for microvertebrate fossils must occur where there is a significant potential for data recovery from those spoils.	D	
	• Monitoring must be performed by a qualified paleontologist and in consultation with a designated paleontologist in each state, NF, or BLM district. The Authorized Officer will designate the appropriate paleontologist depending on project location.	D	
PALEO-3	Areas with Fossil Potential Classification sensitivity rankings of 3, 4, or 5 on NFS lands will be surveyed and posted.	C	Clarification on NFS lands is needed as well. Similar to BLM lands, only PFYC 3, 4, or 5 shall be surveyed. See proposed revisions for PALEO-1.
Agency Proposed Mitigation Measures Adopted by the Proponents			
PALEO-2	Where fossil-bearing sediments are exposed by construction, the sediments must be covered with a 4-inch layer of soil where feasible to reduce unauthorized removal or disturbance of resources.	B	
GEOLOGIC HAZARDS			
Agency Proposed Mitigation Measures			
GEO-1	A site-specific landslide mitigation plan that addresses measures to be taken in the design, construction, and operation to minimize failure due to landslides must be prepared and submitted by the Proponents with the construction POD prior to issuance of a ROW grant on federally managed lands.	D	Contractor will likely conduct additional geotechnical investigations. Specific engineering mitigation plans will likely not be developed prior to the issuance of the ROW grant. As written, if this measure is not completed, no ROW grant will be issued. The geotechnical contractor is locating the areas where there is landslide risk in their evaluation. In areas where they are located, mitigation will be done. Rewrite stating that this would be accomplished but not prior to ROW grant issuance. Proponents propose the following revision: "A site-specific landslide mitigation plan that addresses measures to be taken in the design, construction, and operation to minimize failure due to landslides must be prepared and submitted by the Proponents as the information becomes available during design and construction on federally managed lands."

Number	Description	Code	Final Response
GEO-3	On-site slope stability examinations will be performed on NFS lands for slopes over 40 percent prior to designing project features that require the removal of forest.	C	The geotechnical contractor is locating the areas where there is landslide risk in their evaluation. In areas where they are located, mitigation will be done.
GEO-4	A site-specific soil analysis shall be conducted prior to construction to verify any areas identified as unstable or marginally unstable in the Caribou National Forest Soil Resource Inventory.	C	The geotechnical contractor is locating the areas where there is landslide risk in their evaluation. In areas where they are located, mitigation will be done.
Agency Proposed Mitigation Measures Adopted by the Proponents			
GEO-2	Review the final location of the preferred alternative with affected mine operators and lessees to ensure all measures are taken to protect against subsidence.	A	
SOILS			
Agency Proposed Mitigation Measures			
SOIL-1	Efforts will be made to preserve topsoil and minimize mixing with subsoil. In agricultural areas, the landowner or land management agency will be asked to provide input on placement of removed topsoil. The Wyoming State Reclamation Policy and applicable Agency management plan requirements for soil management will be followed. Soil disturbances in agricultural areas will be developed to minimize impacts to existing agricultural activities where possible. Unless the landowner or land management agency specifically approves otherwise, the Proponents will prevent the mixing of topsoil with subsoil by stripping topsoil from the portion of the construction work area that will be restored (construction pad, storage yards, and fly yards) in actively cultivated or rotated croplands and pastures and other areas at the landowner's or land-managing agency's request. Where topsoil segregation is required, the Proponents will maintain separation of salvaged topsoil and subsoil throughout all construction activities. Immediately after construction, topsoil will be restored to the areas not dedicated to operational requirements and revegetated as specified in the EPMs.	C	The content of this measure is contained within other measures and Proponent proposed measures. Content of this measure would be addressed with private landowners during negotiations with private landowners.
SOIL-5	Disturbed soil will not be allowed to support the growth of noxious weeds, or invasive weedy species. Prevention of noxious weeds will apply to all phases of the Project.	C	Other WEED measures satisfy the intent of this.
SOIL-7	The Proponents are responsible for monitoring to ensure soil protection is achieved, and providing monitoring reports on reseeding success or other methods to stabilize soils to the Forest Service by the end of each growing season for areas on NFS lands.	C	This measure is unclear as to what is being required regarding monitoring "soil protection".

Number	Description	Code	Final Response
SOIL-8	Reclamation of all temporary disturbances on NFS lands (such as road cuts) should include replacement of material to original contours. Re-compaction to pre-existing compaction percentage (which should be identified before disturbance) should be included in the plan. Guidelines for streambank re-compaction to maximize vegetative regrowth and mechanical stability are covered in USACE publication ERDC TN-EMRRP-SR-26 (Goldsmith et al. 2001).	D	The Proponents propose the following revision: "Reclamation of all temporary disturbances on NFS lands (such as road cuts) should include replacement of material to original contours and re-compaction to pre-disturbance compaction percentage (which shall be identified during reclamation at adjacent locations to the disturbance). Guidelines for streambank re-compaction to maximize vegetative regrowth and mechanical stability are covered in USACE publication ERDC TN-EMRRP-SR-26 (Goldsmith et al. 2001)."
SOIL-9	On federal land, follow land management plan requirements on the location of waste material (silt, sand, gravel, soil, slash, debris, chemical, etc.)	C	This measure appears to be incomplete and requires clarification and additional information. The location of waste materials is identified in various plans, such as the SPCC, SWPPP, Construction POD, etc.
SOIL-10	On NFS lands, soil resources will be inventoried to National Cooperative Soil Survey Standards, and volumes and suitability of soil resources for reclamation will be determined prior to disturbance.	C	This is beyond standard practices. Benefit does not outweigh cost. The reclamation contractor shall assess conditions and develop appropriate prescriptions.
SOIL-11	In specific sensitive areas (such as erosive soils, steep slopes) on lands managed by the Kemmerer FO, the access road used for construction will be restored and an alternative access route for operations designated.	C	Implementation of this measure would result in new and currently unknown impacts that would need to be assessed through the current NEPA process.
Agency Proposed Mitigation Measures Adopted by the Proponents			
SOIL-2	The Proponents will submit a Compaction Monitoring Plan for review and Agency approval prior to construction that specifies the conditions under which construction will either not start or will be shut down due to excessively wet soils. Conditions will be measurable in the field and easy to demonstrate to construction workers.	A	
SOIL-3	During decommissioning, some obviously compacted areas, such as established service roads, will require loosening prior to revegetation. If necessary to re-establish vegetation, the Proponents will use a ripper blade, till, or similar instrument to loosen the surface soil layer.	A	
SOIL-4	Reclamation will include revegetation unless pre-existing conditions were not vegetated (rocky areas, agricultural fields). On public land the appropriate agency will provide input on the extent of reclamation, the type of vegetation to be planted, and the monitoring necessary to ensure reclamation success.	C	This measure is addressed in other measures (for example VEG-12). Also, the BLM will have input through approving the final seed mix to be used on BLM lands and the final reclamation plan.

Number	Description	Code	Final Response
SOIL-6	Detrimental soil disturbance such as compaction, erosion, puddling, and displacement will be limited or mitigated to meet long-term soil productivity goals on NFS lands. Treatment should include road ripping, frequent waterbars, cross-ditching (e.g., rolling-dips) or other methods to reduce compaction while preventing gully formation. Ripping pattern should be altered to a crossing, diagonal, or undulating pattern of tine paths to avoid concentrated runoff patterns that can lead to gullies.	D	Preconstruction conditions may not be able to meet long-term soil goals. The Proponents will reclaim to pre-disturbance conditions to the extent feasible. As such, the Proponents propose the following revision: "Detrimental soil disturbance such as compaction, erosion, puddling, and displacement will be minimized through implementing measures identified in the SWPPP. Measures may include road ripping, frequent waterbars, cross-ditching (e.g., rolling-dips) or other methods to reduce compaction while preventing gully formation. Ripping pattern should be altered to a crossing, diagonal, or undulating pattern of tine paths to avoid concentrated runoff patterns that can lead to gullies."
WATER RESOURCES/AQUATIC			
Agency Proposed Mitigation Measures Adopted by the Proponents			
WQA-1	Avoid placement of road bed material in channels (perennial, intermittent or ephemeral). Road bed material contains considerable fines that would create sedimentation in coarse cobble dominated stream channels. Even in seasonally dry reaches those fines could be transported during flow periods and negatively impact fish spawning reaches below.	A	This is an accepted measure to be implemented during design and spotting of access roads, however, there will be crossings as total avoidance is not feasible.
WQA-2	On federal lands, consult with appropriate land management agency staff prior to siting and design for stream crossings (location, alignment, and approach for culvert, drive-through, and ford crossings). This may include a hydrologist, engineer and, for perennial and many intermittent streams, an aquatic biologist.	A	
WQA-5	On non-federal lands, culvert placement should comply with state BMPs. The minimum size culvert will be 12 inches in diameter. If a channel width exceeds 3 feet, additional pipes may be used until the cross sectional area of the pipes is greater than 60 percent of the cross sectional area of the existing channel. Filter cloth should be placed on the streambed and banks prior to placement of the pipe, and the culvert should be covered with a minimum of 1 foot of aggregate.	D	The BMPs should be listed/provided so that Proponent has an understanding of them. The Proponents propose the following revision: "On non-federal lands, culvert placement should comply with state BMPs."
WQA-3	All culverts on NFS lands, both permanent and temporary, shall be designed and installed to meet desired conditions for riparian and aquatic species as identified in the applicable Forest Plan. Culverts should not be hydraulically controlled. Hydraulically controlled culverts create passage problems for aquatic organisms. Culvert slope should not exceed stream gradient and should be designed and implemented (typically by partial burial in	C	There are other measures for culverts that cover this.

Number	Description	Code	Final Response
	the streambed) to maintain streambed material in the culvert		
WQA-4	Culvert sizing on NFS lands should also comply with *Guidance for Aquatic Species Passage Design, Forest Service Northern Region & Intermountain Region* (Forest Service 2003f) , and culvert sizing on BLM-administered land shall comply with BLM Manual 9113.	C	There are other measures for culverts that cover this.
SOIL-4	[See description under Soils]		
VEG-3, -6	[See description under Vegetation]		
FISH-1, -2	[See description under Fish]		
LAND USE			
Agency Proposed Mitigation Measures			
LU-1	To assist agency and county law enforcement in minimizing unauthorized OHV use on public and private lands, monitor OHV use and post signs along access roads where OHV activity has increased in areas on public lands where OHVs are regulated by a land use plan, and on private, state, and Tribal lands at the request of the landowner, agency, or Tribal government. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage shall be maintained and replaced as part of the routine maintenance. Consult with appropriate Agencies on additional measures to block unauthorized OHV use.	D	The Proponents propose the following revision: "Signs shall be posted at access points to service roads where public access is restricted by a land use plan, and on private, state, and Tribal lands at the request of the landowner, agency, or Tribal government. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage shall be maintained and replaced as part of the routine maintenance. "
LU-2	Coordinate with the Foxley Airstrip owner to realign the location of Alternative 1E-C to eliminate the impact to the airstrip or in some manner compensate for any loss of use.	C	LU-2 through LU-10: The Companies are doing all of this as part of the NEPA process and obtaining ROW. Issues will be resolved with landowners during negotiations. It is not clear as to why these specific landowner issues have been elevated above all other landowner issues and identified within the DEIS. These are not MMs that should be in the FEIS as these will be addressed during routing and landowner discussions. the Proponents propose the following revision by replacing these measures with one: "The
LU-3	Work with the private landowner of the ice cave along Alternative 1E-C and microsite the facilities during final design to reduce effects.	C	

Number	Description	Code	Final Response
LU-4	Coordinate with the Chokecherry-Sierra Madre Wind Farm and TransWest Express Project developers and BLM along the Segment 2 Proposed Route to ensure mutually compatible siting of transmission lines and wind energy facilities.	C	Proponents shall work with landowners to minimize impact and address substantiated concerns."
LU-5	Work with the owners of potentially affected industrial buildings and microsite the transmission line during final design to avoid impact to these structures.	C	
LU-6	Review the final location of the Segment 3 Proposed Route with any affected oil/gas well operators to ensure measures are taken to protect against any impacts to wells. This measure also applies to any segment where the Proposed Route would be near oil/gas wells.	C	
LU-7	Once the final locations of towers where crossings of the MTR would occur are known, IDANG should be consulted to ensure that the proper information is made available for proper warnings.	C	
LU-8	Coordinate with the owner of the planned Dry Creek Sky Ranches airstrip to realign the Segment 7 Proposed Route or airstrip or in some way compensate for loss of use.	C	
LU-9	Alternative 8C along Segment 8 should be realigned in the vicinity of the Mayfield Springs subdivision during final design to reduce impact on the planned Mayfield Springs community.	C	
LU-10	Consult with the IDANG to determine if the Segment 8 Proposed Route can be sited in such a way as to not compromise the training mission in the Alpha Maneuver Sector of the Orchard Training Area, thereby avoiding relocation of the existing transmission line if possible.	C	
LU-11	Consult with the BLM to determine how best to construct and maintain the Proposed Route transmission line through the area closed to motorized vehicles along the Snake River to ensure no impacts to existing natural, cultural, and historic resources.	C	This is not a mitigation measure as it is conducted during the NEPA process.
AGRICULTURE			

Number	Description	Code	Final Response
Agency Proposed Mitigation Measures			
AGRI-1	Provide for a qualified Agricultural Specialist to assist construction planning, construction, restoration, post-construction monitoring, and follow-up restoration.	C	Measures would be identified and agreed to during landowner negotiations. Depending upon landowner circumstances and individual property characteristics, all of these measures would not be applied. We should not dictate in the DEIS or through such default measures how the Companies shall interact with all landowners as some measures will not apply or be desirable in all situation. The landowners will know what they want to take place and how they want it to take place on their lands. Landowners may take offense that the BLM appears to be making decisions for them on their lands.
AGRI-2	Maintain an active program of liaison with landowners and tenants, including specific points of contact whose responsibilities shall include pre-construction inventory, notices, complaint resolution, damage assessment, and negotiation and compensation.	A	
AGRI-3	Establish procedures for determining ingress and egress routes with landowners and tenants, protection methods for off-ROW roads over agricultural lands and on ROW pads, including methods such as geotextile matting to segregate temporary rock fill.	C	
AGRI-4	Establish the location of temporary roads to be used for construction purposes through negotiation with the landowner, with existing farm lanes or two tracks as preferred temporary access roads, restoring temporary access roads to pre-construction condition and leaving temporary access roads intact through mutual agreement with the landowner and tenant unless located in flood areas or drainage hazard areas, or otherwise restricted by federal, state, or local regulations.	C	
AGRI-5	Maintain landowner and tenant access across construction areas for farm equipment and livestock to fields isolated by construction activities and install temporary fences and gates across the construction area, as necessary, to facilitate agricultural operations.	C	
AGRI-6	Protect topsoil by stripping and segregating topsoil in the disturbance area on agricultural lands unless negotiated differently with the landowner or tenant. They shall prevent segregated topsoil from being mixed with cut-and-fill materials, rock, construction debris, excavated materials, or other subsoil.	C	
AGRI-7	Restrict the operation of vehicles and heavy equipment, or take other appropriate action, so that deep rutting does not result in mixing of topsoil and subsoil on excessively wet soils on the portion of the construction work area in agricultural land where the topsoil is not stripped.	C	

Number	Description	Code	Final Response
AGRI-8	Protect irrigation operations and drain tiles by 1) contacting landowners and tenants to identify the location of irrigation systems and wells, identified underground irrigation water pipes, well systems, and drain tiles that intersect the construction area; 2) repairing disrupted irrigation and drain tile systems as soon as possible; 3) maintaining the flow of irrigation water during construction or coordinating a temporary shut-off with affected parties; and 4) compensating affected parties for crop losses that result from irrigation and drain tile system interruptions due to construction.	C	
AGRI-9	Protect agricultural lands from dewatering activities by pumping into a constructed energy-dissipating structure that shall minimize damage to adjacent agricultural land, drainage systems, and crops.	C	
AGRI-10	Restore the land to the pre-construction condition or provide compensation.	C	
AGRI-11	Decompaction of exposed subsoil before topsoil replacement shall be accomplished utilizing an agricultural subsoil or other appropriate implement. After decompaction and prior to topsoil replacement, a disc or harrow shall be utilized, as necessary, to smooth the subsoil surface.	C	
AGRI-12	Following final grading and topsoil replacement in agricultural lands, deep tillage shall be used to relieve soil compaction in construction areas or the Proponents shall test soils for compaction at regular intervals. Where soil compaction is tested, construction areas shall be compared to adjacent areas not disturbed by construction.	C	
AGRI-13	Decompact agricultural lands where topsoil has not been removed by using a non-inversion, deep-tillage agricultural subsoiler specifically designed for soil decompaction and designed to minimize surface disturbance and the mixing of subsoil with topsoil.	C	
AGRI-14	Existing range improvements that are damaged or modified during construction shall be repaired. Additionally, temporary fences and gates shall be removed after construction if requested by landowner or land-management agency.	C	
AGRI-15	If a dairy farm reports problems with stray voltage, complete a free, on-site investigation and determine the level of voltage and fix any problems resulting from their transmission line to less than 1 volt.	C	Stray voltage is not likely with transmission construction and operation.

Number	Description	Code	Final Response
AGRI-16	Align the transmission line to avoid the CAFO approximately 14.5 miles east of the proposed Cedar Hill Substation if this route is approved.	C	During routing and siting the Companies are taking all constraints in to consideration to minimize impact as part of the NEPA process and obtaining ROW. Issues will be resolved with landowners during negotiations. It is not clear as to why this specific landowner issues has been elevated above all other landowner issues and identified within the DEIS. This is not a mitigation measure that should be in the FEIS as this will be addressed during routing and landowner discussions. The Proponents propose the following revision by replacing these measures with one: "The Proponents shall work with landowners to minimize impact and address substantiated concerns."
AGRI-17	Realign the transmission line route during final design to avoid affecting any CAFOs.	C	Measures would be identified and agreed to during landowner negotiations. This would be accomplished to the extent practicable during final design.
AGRI-18	Consult with the Farm Service Agency and landowners to determine if construction would affect the CRP status of the land currently enrolled in CRP or if special construction or revegetation techniques would be necessary.	D	Proponents propose the following revision: "Consult with the Farm Service Agency and landowners to determine how construction may affect the CRP status of land currently enrolled in CRP."
TRANSPORTATION			
Agency Proposed Mitigation Measures Adopted by the Proponents			
TRANS-1	The Proponents will attempt to identify existing two-track trails as preferred temporary access roads for construction.	D	The Proponents propose the following revision: "The Proponents will attempt to identify existing two-track trails as preferred access roads for construction."
TRANS-2	Temporary roads will be designed so proper drainage is not impaired and will be built to minimize soil erosion on or near the temporary roads. Consult with appropriate Agencies on additional design measures.	D	The Proponents propose the following revision: "Roads will be designed so proper drainage is not impaired and will be built to minimize soil erosion."

Number	Description	Code	Final Response
TRANS-3	Permanent and temporary roads on NFS lands and BLM-administered lands will be consistent with appropriate National Forest and BLM Transportation Management Plans, as amended, and other applicable rules. Permanent roads built for the Project on NFS lands and BLM-administered lands shall be closed to the public. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage shall be maintained and replaced as part of the routine maintenance. Proponents will monitor permanent roads on NFS land and BLM-administered lands yearly, and the applicable land-managing agency shall be provided with annual monitoring reports. Roads will be maintained as required by the Special Use Permit.	D	Clarification as to what the following really means is needed as it is not clear: "Permanent and temporary roads on NFS lands and BLM-administered lands will be consistent with appropriate National Forest and BLM Transportation Management Plans, as amended, and other applicable rules." There is no justifiable reason to "monitor" roads annually and there is no description as what is to be monitored. Service roads will be maintained as needed. The Proponents propose the following revision: "Service roads built for the Project on NFS lands and BLM-administered lands shall be closed to the public unless otherwise agreed upon with the landowner/manager. Signs shall indicate the restriction or regulation, location, penalty for violation, and appropriate contact information for reporting violations. Signage shall be maintained and replaced as part of the routine maintenance. Service roads will be maintained by the Proponents as needed for Proponent use."
TRANS-4	Upon abandonment, temporary access roads may be left intact through mutual agreement of the land management agency, landowner, the tenant, and the Proponents, unless located in flood areas or drainage hazard areas or otherwise restricted by federal, state, or local regulations.	D	The Proponents propose the following revision: "Roads to be abandoned may be left intact through mutual agreement of the land management agency, landowner, the tenant, and the Proponents, unless located in flood areas or drainage hazard areas or otherwise restricted by federal, state, or local regulations."
AIR QUALITY			
Agency Proposed Mitigation Measures			
VEG-5	[See description under Vegetation]		
Agency Proposed Mitigation Measures Adopted by the Proponents			
AIR-1	Minimize idling time for diesel equipment whenever possible.	A	
AIR-2	Ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use.	A	
AIR-3	Prohibit engine tampering to increase horsepower.	A	
AIR-4	Reduce construction-related trips as feasible for workers and equipment, including trucks.	A	
ELECTRICAL ENVIRONMENT			
Agency Proposed Mitigation Measures Adopted by the Proponents			
EE-1	During final design, limit the conductor surface gradient in order to meet the IEEE Radio Noise Guideline.	A	

Number	Description	Code	Final Response
EE-2	During construction, identify objects such as fences, metal buildings, pipelines, and other metal objects within or near the proposed ROW that have the possibility for induced potentials and currents and implement electrical grounding of these objects according to the utility's and National Electric Code standards.	A	
EE-3	During final design and construction, identify areas where large equipment is anticipated and provide sufficient conductor clearance to ground to meet the NESC 5 mA rule or limit size or access of large equipment.	A	
PUBLIC SAFETY			
Agency Proposed Mitigation Measures			
FIRE-1	Train all personnel about the measures to take in the event of a fire including fire dangers, locations of extinguishers and equipment, and individual responsibilities for fire prevention and suppression.	B	
FIRE-2	Equip all construction equipment operating with internal combustion engines with spark arresters.	B	
FIRE-3	Restrict motorized equipment, including worker transportation vehicles, to the designated and approved work limits.	B	
FIRE-4	Clear equipment parking areas, the ROW, staging areas, and designated vehicle-parking areas of all flammable material.	C	These will be addressed in the Fire Management Plan that will be developed. This conflicts with minimizing vegetation removal in other MMs.
FIRE-5	Require all motor vehicles and equipment to carry, and individuals using handheld power equipment to have, specified fire prevention equipment.	B	
FIRE-6	Provide a list of equipment capable of being adapted to fighting fires to local fire protection agencies.	B	
FIRE-7	Notify the appropriate fire suppression agencies of scheduled road closures.	B	
FIRE-8	Prohibit burning of slash, brush, stumps, trash, explosives storage boxes, or other Project-generated debris unless authorized by the applicable land management agency.	B	
FIRE-9	Designate a Fire Guard on each construction crew prior to the start of construction activities each day and provide a communications system for maintaining contact with fire control	B	

Number	Description	Code	Final Response
	agencies.		
FIRE-10	Restrict or cease operations on federal lands during periods of high fire danger at the direction of the responsible land-managing agency representative.	D	The Proponents propose the following revision: "The Proponents shall comply with fire restrictions and/or waivers as applicable."
FIRE-11	Use direct control for emergency the wildland fire control. When possible, where fire suppression is necessary, use techniques, which minimize soil and vegetation disturbance.	C	
ENV-1	After a route has been selected and before construction, the route would be reviewed for areas within 0.5 mile of petroleum or gas pipelines, oil or gas wells, municipal solid waste landfills, service stations, railroads, municipal landfills, caves, and active and abandoned mines. The locations intersected by the route and these facilities would be compared against state Department of Environmental Quality databases which contain the locations of contaminated facilities and sites undergoing remediation. If contaminated sites are identified, further information would be obtained from Department of Environmental Quality personnel, and the authorized officer would be notified.	C	This is basically conducting a Phase 1 environmental site assessment for a large portion of the route. This is not a common construction practice but rather conducted when there is an apparent need or when properties are purchased due to ownership transfer. During construction, if contamination is encountered, the contamination will be managed appropriately in compliance with all applicable laws. What is the process if there is a likelihood of contamination? What would the authorized officer do? The cost for doing such an analysis greatly outweighs the benefit and is not justifiable. ENV-2 covers this issue appropriately. Contractor preconstruction training may include identification of site contamination.
ENV-2	Construction crews would be trained to look for pre-existing environmental contamination. Indications of contamination could include mine waste rock stockpiles, drums or containers of unknown products, discolored soil, or unusual soil odors. Should indications of contamination be encountered, all surface disturbing activities in the vicinity of the contamination would cease. The location would be marked and project access restricted to eliminate the spread of contamination by construction equipment. The authorized officer would be notified, and the applicable Department of Environmental Quality personnel, and property owner or land management agency informed. To protect site workers, and minimize environmental effects, no work would occur at this location until the environmental conditions have been resolved. The Proponents would not assume responsibility for discovery of pre-existing contamination.	C	It is inappropriate to involve contractors with safety issues specifically to look for and identify contamination. The Proponents advise their contractors to inform the foreman in the event suspicious materials are encountered so that appropriate measures can be implemented.
NOISE			
Agency Proposed Mitigation Measures			

Number	Description	Code	Final Response
NOISE-1	Provide notice by mail prior to construction to all sensitive receptors and residences within 300 feet of construction sites, staging areas, and access roads. The announcement will state specifically where and when construction will occur in the area.	D	The Proponents propose the following revision: "Provide notice by mail, prior to construction to all businesses and residences within 300 feet of construction sites, staging areas, and access roads. No more than one notice by mail is required during the course of construction. The announcement will state the proposed start time for construction activities in the area acknowledging that schedules may change and identify the general area of construction activities."
Agency Proposed Mitigation Measures Adopted by the Proponents			
NOISE-2	Identify and provide a public liaison person before and during construction to respond to concerns of neighboring receptors, including residents, about noise construction disturbance.	A	
NOISE-3	Establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers.	A	
NOISE-4	Implement and maintain a noise complaint review process to deal with residents' or other potential queries and complaints as they arise. Such complaints would be logged and investigated on an individual basis to facilitate resolution of the issue of concern.	A	

AGRI – agricultural resources; AIR – air resources; BLA – blasting; CR – cultural resources; CUL – cultural resources; EE – electrical environment; FIRE – fire;

GEO – geological resources; LU – land use; MN – mineral resources; OM – operation & maintenance; PAC – proposed avian conservation; PALEO – paleontological resources; PGC – wildlife; PMC – proposed mammal conservation; PPC – proposed plant conservation;

PRC – proposed raptor conservation; REC – recreational resources; SOC – socioeconomic resources; SOIL – soil resources; SPC – spill prevention; SW – stormwater; TESPL – TES plants; TESWL – TES wildlife; TR – transportation resources; TRANS – transportation resources;

VEG – vegetation; VIS – visual resources; VR – visual resources; WILD – wildlife

October 28, 2011

Bureau of Land Management
Gateway West Project
P.O. Box 20879
Cheyenne, WY 82003

Re: Rocky Mountain Power and Idaho Power Comments on the Gateway West Draft Environmental Impact Statement (DEIS) Comment Letter

Dear Mr. George,

Rocky Mountain Power and Idaho Power (Companies), express our appreciation for your efforts on the development and publication of the Draft Environmental Impact Statement (DEIS) for the Gateway West Transmission Line Project (Project). The release of the DEIS is an important milestone in the permitting process and one that the Companies have been anticipating as they have invested a considerable amount of resources into developing a Project that balances the need to comply with numerous and sometimes conflicting regulatory requirements, stakeholder issues and concerns and the need to construct the Project in a timely and fiscally responsible manner. We appreciate both your dedication and professionalism as the Project has progressed through the National Environmental Policy Act (NEPA) process.

The Companies are submitting this public comment letter to further clarify a number of technical details described in the DEIS and to reemphasize how critically important this Project is for the Companies to provide reliable service for our customers. As regulated public utilities, the Companies are required to provide safe, reliable and efficient electric service to all customers without discrimination. This obligation frames the process the Companies use to make decisions regarding maintaining, operating and upgrading the Companies' transmission systems. The Companies' comments are divided by topic in the following pages.

Further Description of the Companies' Public Outreach Efforts

The Companies are pleased to see that the results of many of our public outreach efforts have been included in the DEIS. The Companies incorporated feedback received during landowner meetings, scoping meetings and other stakeholder meetings to develop a significant number of re-routes and alternatives to address concerns raised by interested parties at the local, state and federal level. The Companies have received positive feedback from local officials on our public outreach efforts due to our extensive efforts to mitigate concerns brought up by citizen and officials. While Section 5.1.2 of the DEIS, "Stakeholder Outreach" provides a discussion of the meetings organized by the Companies to collaborate with interested parties on the Project, a large number of other outreach activities should be included in the Final EIS to document the extensive efforts the Companies have conducted to address stakeholder concerns. Through April 2011, the Companies have hosted and attended over 150 meetings in addition to those cited in the DEIS. Table 1 starting on page 15 lists these additional outreach efforts.

Despite this, the DEIS mischaracterizes the Companies' efforts by stating that a "substantial segment of public that have not had a chance to express their opinion…" (2nd paragraph, pg 2-203, Section 2.9) In fact, there has been an extraordinary amount of opportunity for the public to express their opinion far beyond what is typically required under the National Environmental Policy Act (NEPA) process, including numerous public meetings initiated by the Companies. Later in the document, the DEIS notes that the BLM will "reserve its identification of a preferred alternative until it has received input on the

routes from all sectors of the public." (4th paragraph page 2-203 Section 2.9.1) While this may be a worthy objective, it is neither required nor practical for the BLM to expect that all sectors of the public will provide their input. Rather, the BLM and the Companies will continue to solicit public input as they have done thus far. The Companies encourage the BLM to identify a preferred alternative soon after the close of the public comment period in order to more productively move the NEPA process forward and further identify issues and concerns that can be resolved. If the BLM continues to defer its decision regarding a preferred alternative based upon unrealistic expectations, then it will unnecessarily do a great disservice to the public by not disclosing one of the most paramount questions for which the NEPA process is intended to answer which is, does the preferred alternative "fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors"? (Glossary – page 133 BLM Handbook H-1790-1).

The Companies' Proactive Routing, Indicative Layout and Engineering Design Efforts

As part of its outreach efforts described above, the Companies have expended a substantial amount of effort towards the siting of the Project to address stakeholder concerns. In many respects, these efforts are not fully captured in Section 2.2.1 of the DEIS which should provide additional detail regarding the methodology of the Companies' siting efforts. However, the several alternative routes in the DEIS reflect years of proactive steps taken by the Companies to avoid and minimize potential Project impacts. Details of the routing and siting process are provided in the following documents and are summarized below:

- Idaho Power Company and Rocky Mountain Power. September 2008. Siting Study. Gateway West Transmission Line Project.
- Idaho Power Company and Rocky Mountain Power. October 23, 2008. Letter to Walt George, BLM Project Manager. Revised Routing in response to Concerns Raised by BLM and Cooperating Agencies
- Idaho Power Company and Rocky Mountain Power. December 30, 2009. Letter to Walt George, BLM Project Manager. Analysis of revised Gateway West Transmission Line Project routing: new and revised routes submitted in response to September 4, 2009 deadline.

The initial proposed route for the Project interconnected 11 substations between Glenrock, Wyoming and the Hemingway Substation located southwest of Boise, Idaho with the intent of avoiding as many environmental constraints as possible. This initial route was modified, altered, updated, re-routed, revised and refined in an iterative process through a feedback loop that among other things incorporated the following steps:

- Identification and data collection of routing opportunities and constraints;
- Focused field reconnaissance in key selected areas to supplement existing data;
- Identification and evaluation of alternative proposed routes and/or substation sites; and
- Consultation with stakeholders, landowners, local counties, tribal representatives, the BLM, USFS and other federal agencies to address their issues and concerns.

This combination of constraint mapping, field reconnaissance and stakeholder input was used to confirm the feasibility of existing or planned corridors, including established utility corridors such as the Section 368 Energy Act West-Wide Energy Corridors (WWEC, BLM et al. 2008). Where no existing or planned corridors existed, a geographic information system-based Linear Routing Tool was used to identify initial "greenfield" corridors for further evaluation (Idaho Power and Rocky Mountain Power, 2009). In several cases, alternative routes were developed to avoid land use conflicts, recreation sites, historic trails, cultural resources, greater sage-grouse leks and buffers, raptor nests, wildlife concentration areas and

many other constraints. Currently, the Companies are refining the indicative layout as part of the engineering design. This is a significantly more intensive effort that incorporates site-specific field data (e.g., species-specific surveys, wetland delineations, results of geotechnical studies, field visits by engineers, etc.) and addresses agency-identified concerns and mitigation measures in the DEIS. The Companies are therefore concerned about future applications of mitigation measures which require further re-routing. Such measures should only be done in finite circumstances after careful consideration of the full suite of potential resource impacts and when not contrary to prior adjustments made in response to concerns of the public, stakeholders, regulatory agencies and landowners. This is especially concerning because the DEIS appears to misrepresent that changing the route or location of a structure or associated facility is an isolated event. In fact, every re-route and adjustment necessarily initiates an iterative design process that must account for many factors and can have a ripple effect that impacts multiple Project features. For example, moving one structure may require several other structures and access roads up and down the line to be moved in order to meet standard transmission line design principles. This is especially unfavorable when the suggested changes require replacing a tangent structure with an angle structure (or multiple angle structures). Angle structures not only significantly increase project costs, but they also require more materials, larger foundations and more permanent ground disturbance. The Companies respectfully request that the BLM include additional routing and siting details as presented above and recognize that any route adjustments moving forward need to be evaluated carefully and in concert with the Companies. The Companies encourage mutual collaboration with the BLM to address any such suggestions as the Plan of Development becomes more refined.

Reiteration of the Companies' Regulatory Obligations

The Western Electricity Coordinating Council (WECC) is the Regional Entity responsible for coordinating and promoting bulk electric system reliability in the Western Interconnection. The WECC carries out responsibilities and exercises rights of a Regional Entity organized on an interconnection-wide basis pursuant to Section 215 of the Federal Power Act. Both Companies are current members and as members are obligated to abide by the bylaws of WECC, all standards or decisions of the WECC as well as their enforcement provisions. As an analogy, Section 215 of the Federal Power Act is to the WECC as the Endangered Species Act (ESA) is to the U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration (NOAA). Just as the BLM must abide by Section 7 of the ESA, the Companies must abide by WECC's bylaws, standards, decisions and enforcement provisions. When the BLM is planning for new projects, they must consider the affects the ESA has on their projects just as the Companies must consider the affects existing electrical pathways have on new project's performance and ratings. Just as violations of Section 7 of the ESA may result in penalties, violations of WECC's bylaws, standards and decisions may likewise result in penalties.

When planning for bulk electric facilities, such as the Gateway West Project, the Companies must follow the System Performance Criteria as stated in TPL-(001 thru 004)-WECC-1-CR. To obtain the performance required this Project cannot be located within a "Common Corridor" of certain existing electrical transmission facilities. The "Common Corridor" is defined by WECC as "Contiguous right-of-way or two parallel right-of-ways with structure centerline separation less than the longest span length of the two transmission circuits at the point of separation or 500 feet, whichever is greater, between the transmission circuits. This separation requirement does not apply to the last five spans of the transmission circuits entering into a substation." Preliminary design of Gateway West alternatives assumes the longest typical span length will be 1,500 feet, which represents the minimum separation distance between the Project and other bulk electrical facilities. In some cases, this offset may need to be modified based upon span lengths of existing facilities, which exceed 1,500 feet in certain conditions, such as steep terrain.

The Companies' obligation to follow WECC's bylaws and standards is not removed because some of the Project stakeholders perceive these bylaws and standards as contrary to their goals or simply do not agree with them. While the Companies recognize that this typical 1,500 feet minimum separation requirement is not clearly understood nor accepted by all stakeholders, it is a fundamental Project requirement supported by explicit direction from the regulatory body governing the Companies' planning for this Project. By not following WECC's bylaws and performance criteria, the Project will not meet its purpose and need as discussed below.

The Project's Regional Significance

The Companies appreciate that the BLM recognizes the regional significance of the Gateway West Project as indicated in the DEIS' description of the No Action alternative which states "If the Gateway West Project, or is not permitted [sic], the demand for transmission services to which its purpose and need refers would not be met with this Project and the area would have to turn to other proposals to meet the transmission demand. According to McBride et al. (2008), the lack of construction of transmission lines could result in substantial adverse impacts on the economic growth, including loss of jobs, in the Pacific Northwest region, which includes Idaho as well as Washington, Oregon, Montana and several Canadian provinces." (1st paragraph page 2-209 Section 2.10.2)

While that statement is accurate, the significance of the Project extends far beyond the Pacific Northwest. Without additional capacity available on the existing electrical grid, new generation including abundant wind development resources would be stranded and largely inaccessible. This scenario would therefore extend outside the Pacific Northwest to other regions, such as Wyoming, where new wind farms that provide economic growth and job opportunities would not be feasible without increased transmission capacity out of Wyoming.

Alternatives Described in the DEIS

The Companies recommend that Alternative 1Ec be removed from detailed analysis. This alternative does not meet the Project's purpose to responsibly access future areas of wind generation (See Table 1.3-3) nor does it meet the BLM's broad policy to "facilitate environmentally responsible development of solar and wind energy projects on public lands" as described in Secretarial Order 3285A1 (March 11, 2009). The Companies originally proposed two routes that allowed the eastern proposed 230kv line (Segment 1E) to access areas with high wind generation potential in Wyoming (see attached Map A on page 14). However upon initial analysis, it was determined that these routes involved several environmental issues, including impacts to visual and cultural resources. In the spirit of Secretarial Order 3285A1's direction, the Companies revised the proposed route for this line to circumvent the east side of the Laramie Range, thereby addressing these resource concerns. Additionally, the Companies re-routed the southern portion of the alignment to the east to avoid core sage grouse habitats. This revised route is labeled 1Eb as shown in Fig A-2 of the DEIS. Following the comment period, the Companies will submit an updated SF299 to show this as our new proposed route for the most eastern 230 kV line.

The Companies realize that there are a myriad of externally-suggested routes for Segment 7. The Companies specifically developed the original proposed route for Segment 7 to minimize impacts by using the most direct route along an existing developed corridor and conducted numerous public outreach efforts to address specific concerns. The alternative routes for Segment 7 are all higher in mileage than the original proposed route and pass through undeveloped areas with rich natural and cultural resources. We have particular concerns regarding alternative routes 7i and 7j due to their substantially higher

mileages and impacts to natural, cultural and recreational resources. These include impacts to the City of Rocks National Reserve, as well as large blocks of undisturbed greater sage grouse habitat.

The Rogerson substation alternative described in the DEIS (developed as an alternative to the Cedar Hill substation) does not meet the Companies' purpose and need as there would still need to be a switching station required at the Cedar Hill location where the load is located. This is a fundamental element of the Companies' project description and is not subject to change. It is also an extremely costly endeavor that would increase the Project's physical footprint and overall disturbance with little to no benefit to the overall electrical system. As such, the Rogerson substation alternative should be eliminated because it does not meet the Project's purpose and need.

Overall, the DEIS should be improved such that a consistent rationale is applied for alternatives considered for detailed analysis versus alternatives eliminated from further consideration. For example, the DEIS should indicate in detail the BLM's rationale such as a) not resolving resource conflicts (citing which resource conflicts) compared to the Proposed Action, b) being substantially similar to another alternative already being considered in detail (noting which alternative and explaining the similarities), c) being technically or economically infeasible (describing why the Proponent's would not or could not construct the Project should that alternative be selected) and/or d) not meeting the purpose of and need for the Project. The DEIS should model each of the alternative's narrative similar to that done for the East of Laramie Mountains alternative (5th paragraph page 2-47 Section 2.4.1.3) which effectively compares it to the Proposed Action and provides distinct points regarding the BLM's rationale as to why it was eliminated from further consideration. The DEIS should not pre-judge impacts such as the description of the Proposed Route between Aeolus and Creston (4th paragraph page 2-55 Section 2.4.3.1) which states that the Proposed Route "would have the least impact…" Rather, the DEIS' description of alternatives should rely on the analysis in Chapter 3 to determine and disclose impacts. This is particularly important to remove unsubstantiated opinion from the DEIS that is confusing to the reader, such as the statement from Power County that "the Proposed Route would have extremely detrimental impacts..." (2nd paragraph page 2-206 Section 2.9.3).

The DEIS also should improve the rationale used regarding its conclusions about the benefits of different alternatives. For example, it is not clearly stated in the document why paralleling an existing line is beneficial (multiple locations including page 54 Section 2.4.2.4) nor is the use of helicopter-assisted construction techniques explained in terms of its limitations, criteria for its application, or its impacts (access and/or service roads may still be required). (2nd paragraph page 2-14 Section 2.1.2). The DEIS also commonly describes mileages of an alternative within certain habitats as a justification of its decision without a clear comparison to the Proposed Route; it is left to the reader to assume the basis of the comparison (multiple locations including Section 2.4.1.3).

Furthermore, the DEIS should refrain from statements such as "the Proponents have stated they cannot support this alternative"(last paragraph page 2-67 Section 2.4.5.3) or "considered as an alternative by the Proponents" (page 2-54 Section 2.4.2.4) because not only is the BLM the primary entity required to consider all the alternatives, but the BLM is also required to verify the accuracy of the Proponents' assertions and present information in the DEIS that does not undermine the NEPA process by appearing to be prejudicial or biased.

Finally, the presentation of alternatives in the DEIS is very challenging to understand and follow. For example, it is difficult to discern which alternatives have been eliminated because the labels in the maps do not correspond to the text. Overall, more clarity is needed between the table comparing alternatives, the maps and the text. (Table 2.4.1 page 2-42-45 Section 2.4).

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Affected Environment and Environmental Effects

The DEIS' description of the existing conditions and potential impacts of the Project includes several assertions that require further clarification or correction. The following list specifies some, but not all, such cases that should be corrected in the Final EIS; these have been included here because they demonstrate issues of especial concern to stakeholders, landowners and/or the Companies. A supplementary list of the Companies' comprehensive comments concerning this section of the DEIS will be provided to the BLM under separate cover.

- Section 3.3.1.3(page 2): The DEIS states "The final determination of impacts and resolution of adverse effects, through the Section 106 consultation process, will not be complete until surveys of all lands crossed by the Project have been completed." This and all similar statements in the DEIS should be revised to indicate that a large percentage of the Project occurs on or near private lands and detailed survey work on those lands (including Class III cultural surveys) will be dependent upon landowners allowing access. The Final EIS also should incorporate the requirements of the Programmatic Agreement that describes in more detail how cultural resources will be addressed.

- Section 3.3.2.4(pages 17-19): When considering whether the Project will have an adverse effect on the setting of cultural sites, the DEIS should consider the current setting of the area, including the presence of existing modern infrastructure that has already affected that setting. For example, does the introduction of a transmission line into a setting that already contains numerous modern intrusions really diminish a significant historic feature if it no longer exists? Is attracting the attention of a casual observer away from a housing tract, farm, interstate highway, or other intrusion that already dominates the landscape an adverse effect?

- Section 3.3.3.3: Prior to this text, Section 3.3.2.4 outlines what is needed for a finding of No Historic Properties Affected and Historic Properties Adversely Affected based on the approved agency protocol. It states that what is needed for moderate or strong contrast constituting an adverse effect is that the "…proposed Project elements tend to dominate the setting." The analyses listed here actually state that the elements would not dominate the setting, yet state there is an adverse effect, which is contrary to the previous explanations. Additionally, these analyses also do not discuss whether or not the setting is truly a significant historic feature of the site or trail segment. As an indication of how confusing this analysis is to the reader, Section 3.3.3.2, page 208 states that the Project has "…potential for the elements to blend into the backdrop in some areas. . ."

- Section 3.4.2.2 (pages 39-40): The DEIS states "These costs appear to be averages of estimates provided by six farmers but the overall estimates do not track with the supporting information by the Task Force." Accordingly, we recommend that the discussion of the farmers' results should be omitted as they do not "track with the supporting information." Furthermore, the farmers' estimates come from a very small sample size that has the potential to provide subjective information.

- Section 3.4.2.3(page 71): The City of Rockland and Power County have made assumptions that the powerline will negatively impact future growth but provide no supporting information, particularly for conclusions that 25 households that would otherwise move to Rockland would move somewhere else as a result of the transmission line. The DEIS should provide supporting rationale and documentation for concluding that these impacts would occur.

- Section 3.7.1.1: The Final EIS should be revised to disclose the rationale and literature citations that support a five mile analysis area and clearly identify the species this was applied to.

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- Section 3.7.2.3: The Final EIS should be revised to indicate that the BLM, not the Proponent, is consulting with the U.S. Fish and Wildlife Service. Section 7 consultation is appropriate for federal agency decisions actions affecting federally listed species.

- Section 3.10.1.1: The Final EIS should be revised to provide supporting rationale and documentation for the assumption that the half mile buffer on either side of the centerline is appropriate to capture and analyze indirect effects of the Project on wildlife. It would seem that this indirect impacts analysis area would vary by species and/or habitat type.

- Section 3.10.1.4: The conclusions of Engel et al (1992) are misrepresented in the DEIS. Engel et al (1992) did not find an increase in ravens along a transmission line. Rather, they determined that ravens already present in the area started roosting in large numbers on a newly built transmission line. The DEIS should be revised to clarify this.

- Section 3.10.2.2: The DEIS should be revised to provide rationale and documentation for all assumptions, methodology and conclusions cited in the habitat fragmentation analysis.

- Section 3.10.2.3: The DEIS should clarify between what is existing habitat fragmentation and what would be additional habitat fragmentation caused by the Project.

- Section 3.11.1.1: The DEIS expands the Analysis Area simply because data are available and not because there is information that would support the assertion that the Project could have an impact on a species at a certain distance. The DEIS should be revised to provide an analysis area appropriate to the type and level of impacts of the Project and not based on the area for which data are available.

- Section 3.11.1.1: The DEIS should provide rationale and documentation as to why an 8-mile buffer was used for assessing fragmentation impacts, particularly since Pruett et al. (2008) estimate edge effects from newly fragmented habitats would extend only approximately 330 feet into habitat patches for prairie chickens.

- Section 3.11.1.5: By omitting the full definition of R1 through R3 habitats, the DEIS is implying that these areas currently support, or are capable of supporting, greater sage-grouse despite definitions contained in the July 2006 Idaho Sage-grouse Conservation Plan which explicitly states the contrary. The DEIS should be revised to include the full definition of the areas so readers can have the correct context to evaluate potential Project impacts.

- Section 3.11.2.2: The DEIS makes unsubstantiated broad statements that need to be reconsidered and verified by referencing appropriate literature citations. For example, the DEIS should provide rationale and documentation for the conclusion that building this Project adjacent to existing lines "…would cumulatively add to the numbers of raptors and ravens that are already utilizing transmission lines in the general area." This logic implies that raptors and ravens are perch limited in the project area. Is there evidence that the existing lines are fully-utilized by nesting raptors and ravens? Are new resources becoming available that can be exploited by new colonizers? Also, as stated in the DEIS, ravens and golden eagles (but also other nesting raptors such as red-tailed hawks and ferruginous hawks) have large home ranges and already exploit areas miles from the existing power lines. Would a new line adjacent to an existing line provide additional areas to be exploited by nesting ravens and raptors?

- Section 3.11.2.2: The DEIS states "The USFWS's 12-Month Findings for Petitions to List the greater sage grouse as Threatened or Endangered (2010e) listed the following as potential impacts to the greater sage-grouse resulting from power lines: 1) collisions/electrocutions, 2) consolidation of predatory birds along power lines, 3) lower recruitment rates near lines, 4) habitat fragmentation, 5) degradation of habitat due to spread of invasive plant species, 6) impacts resulting from the line's electromagnetic fields, and 7) direct loss of habitat." However, the DEIS should also disclose the level of uncertainty in the USFWS's findings. Knick et al (2010) state that "The underlying cause for population declines in this western species [Greater sage grouse] is loss of suitable sagebrush habitat to meet seasonal requirements for food, cover, and nesting". Only anecdotal information is available on collisions of sage grouse with distribution lines or telephone wires (UWIN 2010). Increased predation of sage-grouse due to nesting ravens and raptors is largely unsubstantiated. In fact, much of the literature on sage grouse predation in relation to transmission or distribution lines is anecdotal, limiting inferences from these studies (Ellis 1984, 1985b, 1987, 1989). Only one long-term study has been conducted to determine the effect of transmission lines on sage grouse recruitment rates (Blomberg et al 2010). This study showed no effects on sage grouse vital rates were found after 7 years of study of the Falcon-Gondor 345 kV line. Lastly, effects of habitat fragmentation on sage grouse due to power lines have not been established (UWIN 2010). Wisdom et al (2011) found that distance to transmission lines [and distance to cellular towers], have unknown relations with sage grouse population dynamics at regional extents.

- Section 3.11.2.2: The DEIS over-generalizes the conclusion of Stevens (2011). Stevens (2011) determined that sage grouse collisions with fences was highest near leks and rapidly dropped off with distance to leks. Furthermore, Stevens (2011) study indicated that collisions were influenced by technical attributes of the fences. Fences built with steel post showed higher collisions than those built with wooden posts and wider spacing between posts. Broad-scale modeling suggested probability of collision was influenced by region, topography and fence density. Thus, if fence removal or modification is considered as a mitigation measure, only those fences should be modified or removed that have the highest probability of causing mortality to sage grouse. These fences are those closest to leks, are exposed on higher terrain and are less visible due to their construction.

- Section 3.11.2.2: The DEIS indicates that indirect effects to the greater sage grouse from the Project operations include "… a potential avoidance of tall transmission structures that could result in an increase in habitat loss and fragmentation …." However, the UDNR 2010 literature review found "…that there were no peer-reviewed, experimental studies designed specifically to evaluate the landscape effects of tall structures on sage grouse." They found "…no 'peer-reviewed' manuscripts that reported results from experimental studies to document sage-grouse avoidance of tall structures, increased predation related to avian predators using tall structures as perches, increased mortality attributed to collisions, or habitat degradation and/or fragmentation attributed to tall structures." The literature synthesis "…did find professional opinions, personal observations, unpublished data, anecdotal references and models that implicated tall structures as potential causal agents of the above effects on sage grouse and peer reviewed studies on the cumulative effects of oil and gas development and associated infrastructures on sage grouse." The latter studies did not isolate tall structures, as defined by this Project, as a specific mechanism affecting sage grouse. The DEIS should be revised to disclose the lack of documentation to support its conclusions regarding the anecdote that sage grouse would avoid tall transmission structures.

- Section 3.11.2.2: The DEIS should provide rationale and documentation to support conclusions regarding the impacts of electromagnetic fields on sage grouse.

- Section 3.11.2.2: The DEIS should be revised to provide rationale and documentation for its conclusions regarding potential impacts from electrocution and fragmentation of habitat by roads.

- Section 3.13.1.3: The DEIS should define "significant paleontological resources".

Cumulative Effects

The DEIS' description of the cumulative effects of the Project also includes several conclusions that require correction. As above, the following list specifies some, but not all, such cases that should be corrected. A supplementary list of comments concerning this section of the DEIS will be provided to the BLM under separate cover.

- Section 4.1.2, Table 4.1-1: Ten miles seems excessive for a cumulative impacts analysis area for eagles. For example, USFWS uses a 6 mile buffer for determining disturbance impacts to golden eagles. All cumulative impacts analysis areas for wildlife species should include a rationale for why they were chosen, including specific references to support that rationale.

- Section 4.1.2, Table 4.1-1: It is confusing why the DEIS uses multiple cumulative impacts analysis areas for sage grouse. The Final EIS should be revised to disclose the most appropriate distance to capture cumulative impacts, provide the rationale for that distance and use that area to assess cumulative effects.

- Section 4.1.3 (page 8, paragraph 1): The DEIS should say that implementation of the Proposed Action and alternatives would include land use plan amendments instead of saying they would be "incompatible" with existing land use plans. The Proposed Action and alternatives includes proposals to amend existing land use plans as necessary to ensure that they are in compliance with those plans in the event one is chosen in the Record of Decision.

- Section 4.1.3 (page 8, paragraph 2): The assumption that the land use plan allocation is a cumulative effect is incorrect. Changes in the land use plan allocation are required specifically for this Project to occur and are therefore "connected actions" to the Project, not "cumulative actions". As such, the impacts of these land use plan amendments should be disclosed as direct effects and should be assessed using appropriate broad programmatic analysis indicating the consequences of the change in management of this land (in contrast to vague references to future projects that could occur there because of the change). Secondly, the cumulative effects section should describe the impacts of site-specific impacts of "reasonably-foreseeable future actions" on the same resources that this Project would affect. The term "reasonably-foreseeable" implies those actions are either planned or proposed. Future actions that may or may not occur as a result of a land use allocation change in the land use plan is speculative at best and is not appropriate for cumulative impacts analysis. All "cumulative effects" described in Section 4.1.3 for land use plan amendments should be moved to the appropriate direct/indirect impacts sections of the DEIS.

- Section 4.1.3.5 (page 11): The DEIS states "Changes in the VRM designation and the possible designation of a utility corridor along either Alternative 4B or 4D, if they are chosen and constructed, would have the effect of encouraging further transmission development to be sited in this corridor. Two proposed transmission lines; a 500-kV DC (TransCanada's Zephyr line) and a 500-kV DC or AC line (Jade Energy's Overland Intertie) were originally proposed to follow the Gateway West alignment. Both projects are on hold as of June 2011. If either moves forward in the future, they

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would likely be built along this alignment and in the designated utility corridor if this Project were approved and constructed in this location." It is our understanding that both these projects have been placed on indefinite hold; therefore, they should not be considered reasonably-foreseeable. Additionally, it is speculative to assume they would be built along the Project alignment unless they are actually proposed to be built there.

- Section 4.2.1.4 (page 34): There are no existing or proposed solar facilities that would be impacting the same resources as the Project. Accordingly, the DEIS should be revised to remove the descriptions of the potential impacts to solar facilities.

- Section 4.2.2.5 (page 46): The DEIS states "In 2010, ICF International published a report conducted for the Wyoming Infrastructure Authority called the *Wyoming Collector and Transmission System Conceptual Design* (ICF 2010a). This report considered two wind resource development scenarios—one that included wind resources west of the Laramie Range and one that included wind resources primarily on the east side of the Laramie Range. The intent was to provide a conceptual design for up to 12 gigawatts (GW) of renewable capacity. The report concluded that it was conceptually feasible to provide for this capacity under both resource scenarios..." This verbiage does not describe reasonably foreseeable future actions that are either actively proposed or planned and therefore is speculative at this time and should not be considered as a cumulative effect.

- Section 4.2.2.5 (page 48): The DEIS states "Wind projects are still in development in Wyoming, but many appear to be on hold (see Table 4.2-15). According to AWEA, an industry association, there are 1,412 MW of installed capacity in Wyoming, of which 310 MW were added in 2010. Several projects were located in areas with good wind resources but also in areas listed by the State of Wyoming as Core Habitat for sage grouse, where the Governor of Wyoming has stated (EO 2011-5) that wind development is inappropriate. It is therefore not clear how much wind energy will be developed in Wyoming, or where that development will occur..." As above, this verbiage does not describe reasonably-foreseeable future actions that are either actively proposed or planned and therefore is speculative at this time and should not be considered as a cumulative effect.

- Section 4.2.2.5, Table 4.2-16: All six pumping projects referred to at the start of the section should be included in this table for clarity.

- Section 4.4.3 (pages 55- 59): This section does not include an assessment of the visual impacts when considered with existing development and how that has affected the current visual conditions. Accordingly, it does not have an adequate baseline for comparison to defensibly say that Project impacts would be "substantial".

- Section 4.4.5 (pages 60-62): This section of the DEIS does not estimate the cumulative numbers of new workers and revenues from reasonably-foreseeable future projects. This information is necessary to disclose the cumulative socioeconomic impacts on housing, infrastructure and tax revenues. As it is now, the DEIS has no basis for saying there would be housing shortages.

Plan Amendments

Similar to the inconsistent rationale applied to the discussion of alternatives, the DEIS is not consistent when disclosing plan amendments required for the Project. The best example, however, is for the Kuna MFP which should serve as a template for other plan amendment descriptions. In particular, the Kuna MFP description correctly identifies that several plan amendments would be needed to make the Proposed

Route conform with BLM land use plans in effect: 1) an amendment to allow the transmission line outside of existing corridors, 2) amendments to the SRBOP RMP's VRM classes to permit surface-disturbing activity within 0.5 mile of sensitive plant habitat, and 3) to allow a utility corridor outside the two utility corridors identified in the plan.

The one part of this description that could be improved relates to its explanation that an amendment would be needed to allow the Proposed Route to be constructed within a non-motorized area, but the Boise District BLM office has stated that such an amendment would not meet the RMP's objectives and therefore is not implementable. Other examples of similar scenarios occur where implementation of a given alternative is precluded from occurring. If indeed a given alternative cannot be implemented, then it should not be carried forward for detailed analysis in the Final EIS.

The Wyoming Governor's Executive Order 2011-5

The DEIS does not adequately describe nor cite the Wyoming Governor's Executive Order 2011-5 (EO 2011-5, which replaces 2010-4). At a minimum, the DEIS should disclose which alternatives are consistent with EO 2011-5, including its provision that new transmission lines built within ½ mile of existing 115kV or greater facilities would be acceptable and discussion regarding agreement/ disagreement between agencies' current management plans and the EO. The DEIS would benefit greatly by including a map specifically depicting greater sage- grouse Core Population Areas and alternatives that traverse them rather than Figure E 11.2 which shows these areas but not the Project's alternatives.

Project Description – Access and Service Roads

The Companies have noted several inaccuracies in the Project Description that will be identified in a comprehensive set of comments provided to the BLM under separate cover. Of particular concern is the DEIS' description of the Project's access and service roads. The DEIS frequently refers to access roads and infrequently refers to service roads. The Companies' definition of access and service roads has been provided to the BLM and is included in Appendix C-4, Section 4.1. Generally, access roads are roads that provide direct or indirect access to the transmission line or associated facilities but that is not their primary purpose; these roads may be used by the public or other permit holders. The sole purpose of service roads is to provide access to the transmission line or associated facilities by the Companies. It is important to make this distinction since access and service roads will have different levels of use, different users and the mitigation measures in the DEIS cannot and should not be applied universally to access and service roads. For example, there is a requirement to gate all access roads. Since access roads are used by others, it may not be appropriate to install a gate or otherwise limit their use. Another example is LU-1 that would require the Companies to monitor OHV use on access roads. Since these roads are open to other uses, monitoring increased OHV use should not be the responsibility of the Companies; rather, it is the responsibility of the land managing agency. The DEIS (page 95 Section 3.2.2.3) states that any new roads would be closed. The Companies will work with all landowners to determine if new service or access roads should be closed to the general public. Not all new roads may be closed based on such agreements. Moreover, new access roads are likely to be left open since by definition they are open to use by others.

Environmental Protection and Mitigation Measures

The DEIS states that the Companies' proposed environmental protection measures (EPMs) for wildlife species were rejected and the Companies need to follow what is in the applicable Resource Management Plan (RMP) or request an exemption. Furthermore the DEIS states "The Proponents have proposed to

supply monitors to determine seasonal occupancy of various big game restricted areas. The Agencies reject the monitoring proposal…" (Page 26 Section 3.10.2.2). However, the DEIS fails to explain why the Company-proposed EPMs will not result in protection that is equivalent to what is in existing resource plans; rather, the DEIS implies they were rejected solely because there is an exception process in place. The DEIS further confuses the matter because it presents Company-proposed EPMs as if they will be implemented as stated on page 4 Section 3.1.3.7. Several of the Company-proposed EPMs are tied to the monitoring proposal that has been rejected such as PGC-33 through PGC-36 regarding monitoring within mule deer critical winter range. The DEIS also does not identify which currently existing RMPs do not address sensitive species; in these cases, the Company-proposed EPMs would be more protective since there are no other protections in place. For example, the current Four River Field Office RMP provides no specific information for slickspot peppergrass; the Shoshone Field Office has no specific information for burrowing owl; and the Caribou-Targhee National Forest has no specific information for northern goshawk.

In terms of agency-proposed mitigation, each resource within the DEIS has a set of agency-derived mitigation measures some of which conflict with mitigations proposed for other resources. For example, OM-10 and OM-20, Company-proposed measures that the BLM has accepted, state that low growing vegetation and small trees may be left in the right-of-way (ROW) and VIS-12 requires minimization of tree removal. However, VEG-5 requires brush clearing in the ROW to minimize fires. Obviously both sets of mitigations cannot be applied as they are mutually incompatible. The DEIS should remedy such cases and ensure that the analysis correctly captures what mitigations would be applied.

In addition, the DEIS includes several mitigation measures that require report submittal and agency approval prior to the start of construction activities. For example, TESPL-3 states that "Qualified botanists shall conduct pre-construction surveys during a season when target species are readily identifiable for special status or globally rare species…Survey reports documenting the surveys, their results and recommendations must be provided to land management agency for approval prior to construction… Documentation of the evaluation of avoidance of impacts to sensitive and globally rare plants must be provided to the Agencies prior to construction." The Companies encourage the BLM to delegate such approvals through an agency-approved contractor dedicated to the Project as a representative of the agencies. This process would protect resources and facilitate construction in a reasonable and timely fashion.

Conclusion

As stated previously, the Companies' plan to submit under separate covers the following information to the BLM:

- A comprehensive list of comments on the DEIS,
- An updated list of Proponent-committed environmental protection measures and mitigation plans that the Companies intend will include as part of the Project description,
- An updated description of the Companies' purpose and need statement,
- Any response(s) to comment letters on the DEIS where appropriate, and
- An updated Standard Form-299 to describe any changes to the Project not reflected in the DEIS.

The Companies greatly appreciate the contributions of the BLM, other federal, state and local agencies as well as landowners, members of the public and multiple stakeholders. It is inherent that a project of Gateway West's magnitude will introduce complex issues that are extremely challenging to resolve. As demonstrated by the nearly 200 public outreach activities thus far conducted by the Companies, we recognize and value the input of all those willing to share their opinions. However, as federally-regulated

and state-regulated companies, the Companies have an obligation to provide safe, reliable, adequate and efficient electricity. The Energy Gateway West Project is an essential part of the Companies' future plans to serve customers, provide new transmission capacity and improve reliability of the existing system. Large infrastructure projects like the Gateway West Project have not been built for multiple decades and are intended to have long asset lives. Therefore, it is crucial they are planned, sited, designed, and constructed to be reliable and deliver the performance for which they are being planned. Please feel free to contact Pam Anderson at 801-220-2481 or Pam.Anderson@PacifiCorp.com or Todd Adams at 208-388-2740 or Tadams@idahopower.com.

Sincerely,

Pam Anderson
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Rocky Mountain Power

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Map A – Wyoming Wind Power Projects

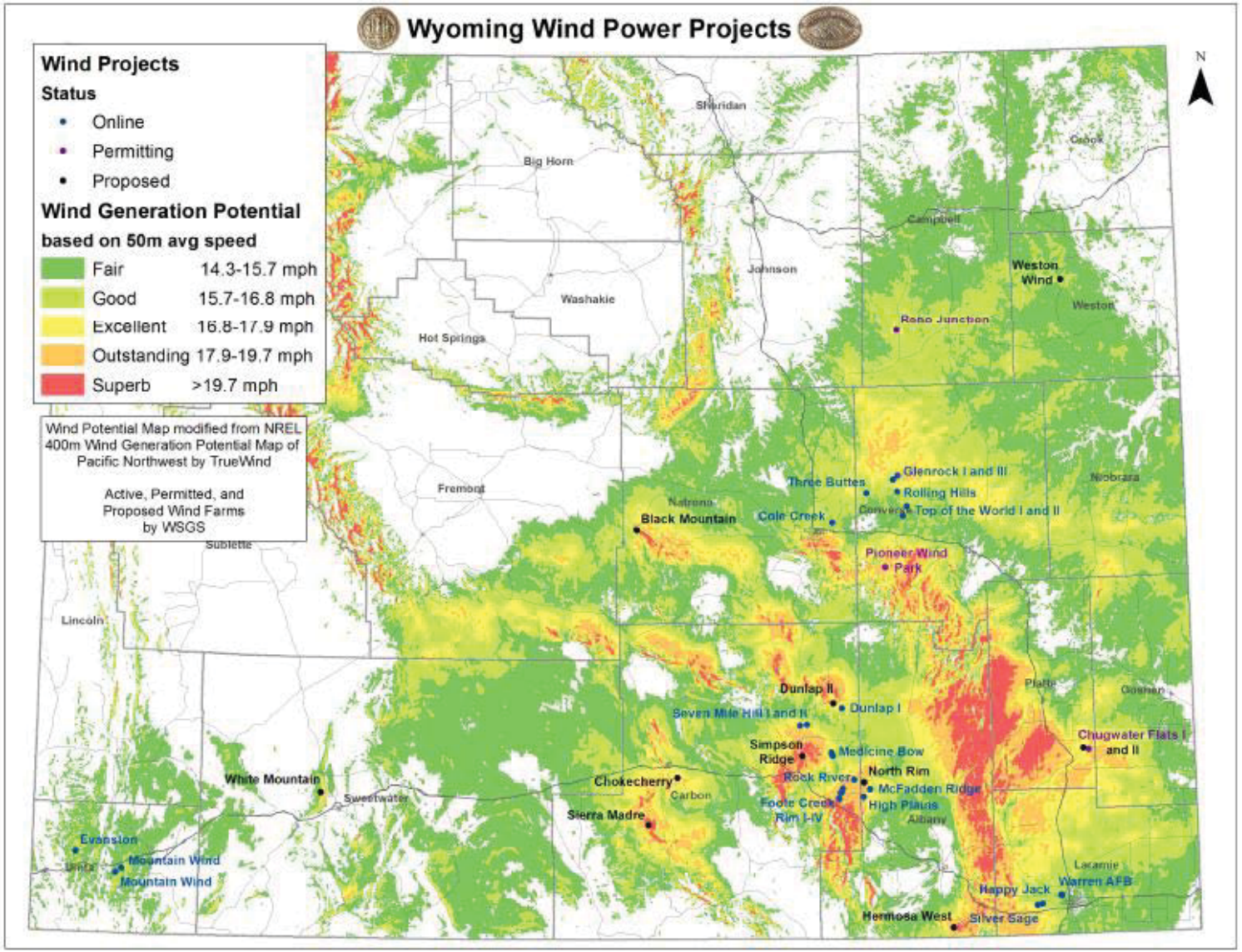

Table 1 – Additional outreach efforts conducted by the Companies not included in the DEIS

Gateway West Transmission Line Project	
Outreach Matrix	
Date	**Title**
4/10/2007	Group One Realtors Presentation
12/11/2007	Owyhee County Meeting (Mary Huff and Reva ?)
12/13/2007	Leadership Meridian Presentation
1/30/2008	Ada County Planning and Development Presentation
2/1/2008	Canyon County Planning and Development Presentation
2/1/2008	Nampa City Presentation
2/4/2008	Mountain Home Chamber of Commerce
2/19/2008	Mountain Home Rotary
3/20/2008	Canyon County Planning and Zoning Commissioners Presentation
5/12/2008	Elmore County Commissioner Meeting
5/19/2008	Owyhee County Meeting
5/22/2008	Elmore County Commissioner Meeting
5/22/2008	City of Mountain Home Meeting
6/3/2008	City of Glenns Ferry Meeting
6/10/2008	Twin Falls County Planning and Zoning Commissioners and Planning and Development Presentation
6/10/2008	Cassia County Development Services Director Presentation
6/25/2008	Display Booth - Association of Idaho Cities Conference
7/28/2008	Canyon County Commissioners Presentation
7/31/2008	Planning and Zoning Director, Steve Hasson, Meeting
8/5/2008	Ada County Energy Resource Committee Meeting
8/15-8/17/2008	Display Booth - Idaho Association of Counties
9/15/2008	Elmore County Commissioner Meeting
9/26/2008	Rock Springs Landowners Meeting
10/8/2008	Kuna City Council and Planning and Zoning Commission Meeting
11/19/2008	Canyon County Development Services Meeting
11/24/2008	Ada County Development Services Director Meeting
12/10/2008	Landowner Conversation - Montpelier, ID
12/11/2008	Landowner Conversation - Rock Springs, WY
12/15/2008	Landowner Conversation - Murphy, ID
12/15/2008	Local Elected Officials Luncheon - Kemmerer, WY
12/15/2008	Landowner Conversation - Kemmerer, WY
12/16/2008	Landowner Conversation - Twin Falls, ID

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12/16/2008	Landowner Conversation - Rawlins, WY
12/16/2008	Board of County Commissioners Briefing
12/17/2008	Landowner Conversation - Pocatello, ID
12/17/2008	Douglas Rotary Presentation
12/17/2008	Landowner Conversation - Glenrock, WY
12/18/2008	Elected Officials Lunch - Casper, WY
1/20/2009	Owyhee County Meeting
1/27/2009	Wald Vold Subdivision Meeting
1/27/2009	Canyon County Commissioners Meeting
1/28/2009	Owyhee County Coordination Meeting
2/3/2009	Elmore County Commissioner Meeting
2/3-4/2009	Display Booth - Idaho Association of Counties
2/17/2009	Parma Lions Club
2/18/2009	American Falls Stakeholder Meeting
2/18/2009	Western Watersheds Briefing
2/19/2009	Shoshone-Paiute Tribe, Wings and Roots
2/24/2009	Owyhee County Planning and Zoning Commission Meetings
2/26/2009	Owyhee County Planning and Zoning Commission Meetings
3/5/2009	Rockland alternative site recon with truck and ATV
3/11/2009	Wyoming Public Services Commission
3/11/2009	Hollister Neighborhood Meeting
3/16/2009	City of Grand View Briefing
3/24/2009	Jennie Lois Osborn Trust Meeting
3/26/2009	Landowner Conversation - American Falls, ID
4/6/2009	Rocky Mountain Elk Foundation and Idaho Fish and Game Meeting
4/7/2009	City of Glenns Ferry Briefing
4/7/2009	City of Mountain Home and Elmore County Briefing
4/8/2009	Kuna City Officials Meeting
4/8/2009	Sweetwater County Planning and Zoning Commissioner's Meeting
4/9/2009	Melba City Hall (Noni Stapleton-clerk/administrator)
4/9/2009	Owyhee County Planning and Zoning
4/13/2009	Mountain Home AFB Meeting
4/17/2009	Canyon County Development Services Meeting
4/17/2009	City of Melba Elected Officials Meeting
4/20/2009	Idaho Association of Counties, Region V
4/22/2009	Burley Dairies
4/23/2009	City of Kuna Engineering Department (Gordon Law)
4/23/2009	Senator Peterson Meeting
4/27/2009-6/15/2009	Meetings with Kuna officials

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4/29/2009	Boise Bench Lions Club
4/29/2009	NGO and State Agency Meeting - Cheyenne, WY
4/29/2009	Owyhee County Coordination Meeting - Boise, ID
4/30/2009	Ada County Commissioners
4/30/2009	Bruneau Town Hall Meeting
5/4/2009	Idaho Elected Officials Meeting
5/5/2009	Mountain Home Office
5/5/2009	Grand View Meeting
5/5/2009	Glenns Ferry Meeting
5/6/2009	Senator Anderson 1E and Alt 1E Route Tour
5/7/2009	North Laramie Range Alliance Meeting - Douglas, WY
5/7/2009	Meeting in Boise with Ryan Peterson, attorney representing AF group
5/8/2009	Emmett Lions Club
5/13/2009	Planning & Zoning (P & Z) Administrator (Mary Huff) & the P & Z Admin. Assistant (Reva Tobois)
5/18/2009	Elmore County Commissioners
5/28/2009	Meeting with Kelly Murphy
5/28/2009	Meeting with Commissioner Kramer and several land owners, re: an alternate route proposal in the Castleford area
5/29/2009	KBAR 1230 AM Radio call-in show
6/1/2009	Cassia County Working Session
6/5/2009	Idaho-Oregon Fruit and Vegetable Association Annual Breakfast
6/8/2009	Power County Community and Public Mtg
6/9/2009	Burley Rotary Club Meeting
6/9/2009	China Ditch meeting/Wilson Creek
6/10/2009	Bannock County Planning and Zoning Working Session
6/15/2009	Cassia County/Power County Work Session
6/15/2009	BLM/City of Kuna Working Session
6/17/2009	Cassia County Work Session
6/17/2009	Chip Harding (Carlin Ranch) Meeting
6/18/2009	Owyhee County Committee meeting
6/22/2009	Cassia County Working Session
6/24/2009	Diemer True Meeting
6/24/2009	Senator Anderson Meeting
6/29/2009	Cassia County Working Session
7/6/2009	Ada County Landowners (Kuna & Melba) meeting with BLM
7/6/2009	Cassia County Working Session
7/7/2009	Twin Falls Radio Show
7/9/2009	Northern Laramie Range Alliance meeting
7/13/2009	Cassia County Working Session

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7/13/2009	Walt Minnick's office (meeting)
7/20/2009	Cassia County Working Session
7/23/2009	All County Mtg and NV Siting Authority
7/27/2009	Cassia County Working Session
7/28/2009	Bannock, Oneida, and Power County (MOU)
8/4/2009	Meeting with Dave True & Bill Graeve
8/4/2009	Meeting w/ Diemer True & Kenneth Lay, Tom Swanson, Sharon Rodeman, Steve Sibrel, and other members of Northern Laramie Range Alliance
8/5/2009	Meeting w/ Converse County Commission Chairman Ed Werner & Commissioner Dave Edwards
8/11/2009	Owyhee County meeting
8/12/2009	Kuna Meeting
8/17/2009	Meeting w/ Senator Anderson
8/17/2009	Meeting with Dave True, Hank True & Bill Graeve
8/17/2009	Meeting with Diemer True
8/18/2009	Meeting w/ Power County staff
8/19/2009	Ada Congressional meeting
8/28/2009	Colleen Allen Meeting
9/8/2009	Hawkins Basin meeting at landowner's house. Power/Bannock County boundary
9/14-9/15/2009	WY Legislature-Minerals Committee Meeting
9/14/2009	Wheatland Community Conversation
9/15/2009	Medicine Bow Community Conversation
9/16/2009	Laramie Community Conversation
9/17/2009	Douglas Community Conversation
9/22/2009	Lincoln Conservation District
10/23/2009	Collaborative Work Session
11/4/2009	American Falls Community Meeting
11/17/2009	Hawkins Basin conceptual route changes meeting
1/11/2010	Cassia County Commissioners meeting
1/12/2010	Malad Meeting with Don Buehler
2/2/2010	Idaho Association of Counties Meeting
2/22/2010	Cassia County Commissioners meeting
2/25/2010	Irrigators conference
3/9/2010	Fort Hall meeting/briefing
3/19/2010	Taylor Merrill (Westpark Company) Meeting
6/17/2010	Governor's: Kemmerer Meeting
7/12/2010	Bill Loughmiller Meeting
8/20/2010	Board of Agriculture/Wyoming Association of Conservation Districts Meeting

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8/24/2010	Lincoln Conservation District
9/13/2010	The Nature Conservancy Meeting
9/18/2010	Wyoming Outdoor Council (NGO meeting)
10/4/2010	Edison Electric Institute Conference
10/12/2010	Rockland Meeting
11/16/2010	Conservation Districts (affected by GW) meeting
11/16/2010	Cory and Jamie Kress Landowner Meeting
2/16/2011	Capital for a Day hosted by Governor C.L. "Butch" Otter
4/21/2011	Kemmerer FO - Gateway West Project Meeting
4/27/2011	Sweetwater County Planning and Zoning Commissioner's Meeting

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Chapter 1 - P&N					
	1.2	3	1	The purpose of the federal action on federally managed lands is to determine if providing for the use of those lands for portions of the Gateway West Transmission line is in the public interest. The need for the action is established by the federal agencies' responsibility under the Federal Land Policy and Management Act (FLPMA2) to respond to an application for a ROW. In addition, the USACE must respond under the Clean Water Act (CWA3) to an application for a permit to dredge or fill waters of the United States, including wetlands. The purpose and need for major federal authorizing actions requested for the proposed Project to proceed are further described below.	The purpose of the federal action is incorrect: It's not to determine if it is in the public interest, but rather to provide access to those lands.
	1.2.1	4	1st bullet	Decide if a ROW grant should be issued for the transmission line;	BLM's decision should also include issuing a ROW grant for access roads and ancillary facilities.
	1.3	15	T1.3.3	Table	Heward sub is not existing-to be built adjacent to Difficulty Sub-looks like the Difficulty description was kept and just changed the name to Heward. Also issue in T2.1.2
	1.3.1	11	T1.3.1	Table	Bridger West line: Parallel Segment should be Anticline not JB: Note 2: change JB to Anticline
	1.3.1.1	7	1	The number of customers in Idaho Power's service area is expected to increase from around 490,000 in 2009 to over 680,000 by 2029. Firm peak-hour load (the peak hourly electricity that the system must supply when demand is at its highest) has increased from 2,052 MW in 1990 to over 3,000 MW in 2006, 2007, 2008, and 2009. In June 2008, the peak-hour load reached 3,214 MW, which was a new system peak-hour record. Average firm load (the average annual demand from customers) has increased from 10,500,000 megawatt hours (MWh) in 1990 to 15,800 MWh in 2008 (excluding Astaris/FMC) (IPC 2009). While the economic downturn is expected to depress customer demand for electricity in the near term, Idaho Power forecasts that on average their load will continue to grow at about 0.7 percent per year to approximately 17,500,000 MWh in 2019. During the same period, the peak-hour load is expected to increase at a rate of 57 MW per year, adding an additional 570 MW of peak-hour demand by 2019 (IPC 2009).	In June 2011, Idaho Power filed our 2011 Integrated Resource Plan (IRP) with the public utilities commissions in Idaho and Oregon. The IRP is available at: http://www.idahopower.com/AboutUs/PlanningForFuture/irp/2011/default.cfm The text within the DEIS needs to be updated to reflect the current IRP. Replacement text for the DEIS is provided below. The number of customers in Idaho Power's service area is expected to increase from around 490,000 in 2010 to over 650,000 by 2030 (IPC IRP 2011). Firm peak-hour load (the peak hourly electricity that the system must supply when demand is at its highest) has increased from 2,052 MW in 1990 to an annual average of 3,090 MW for the years 2006 to 2010. In June 2008, the peak-hour load reached 3,214 MW, which was a new system peak-hour record. Average firm load (the average annual demand from customers) has increased from 10,500,000 megawatt hours (MWh) in 1990 to 15,200,000 MWh in 2010 (excluding Astaris/FMC) (IPC IRP 2011). While the economic downturn is expected to depress customer demand for electricity in the near term, Idaho Power forecasts that on average their long term load growth rate will be about 1.4 percent per year and that load will grow to approximately 18,300,0000 MWh in 2020. During the same period, the peak-hour load is expected to increase at a rate of 69 MW per year, adding an additional 690 MW of peak-hour demand by 2020 (IPC IRP 2011).

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	1.3.1.1	7	last	Idaho Power is a regulated public utility under the laws of the State of Idaho whose mission is to provide reliable, responsible, fair-priced energy. Idaho Power operates under the oversight and regulatory controls of the Idaho Public Utility Commission...	Change Utility to Utilities
	1.3.1.1	8	2	Idaho Power is also a public utility under the jurisdiction of the FERC. Idaho Power is obligated to expand its transmission system to provide requested firm transmission service, and to construct and place in service sufficient capacity to reliably deliver resources to network and native load customers as provided in their Open Access Transmission Tariff (OATT) under Sections 15.4 and 28.3 (FERC 2008). Idaho Power's Attachment K of the OATT requires planning for the expansion of the system to ensure that its transmission system meets industry, regulatory, and reliability standards.	The obligation to plan is described in the OATT under section III Network Integration Transmission Service: "The Transmission Provider will plan, construct, operate and maintain its Transmission System in accordance with Good Utility Practice and its planning obligations in Attachment K in order to provide the Network Customer with Network Integration Transmission Service over the Transmission Provider's Transmission System." Replace existing text with the following: Idaho Power's OATT requires planning for the expansion of the transmission system in order to provide network integration transmission service that complies with regulatory reliability standards.
	1.3.1.2	8	4		The last sentence in paragraph 4 page 1-8 should be changed to state "The growth rate is reflective of all customer loads."
	1.3.1.2	8	last	Rocky Mountain Power operates under oversight and regulatory controls of the public utility commissions of Wyoming, Utah, and Idaho. The Wyoming Public Service Commission (PSC) regulates rates, integrated resource plans, construction of large electric facilities, and transactions between utilities. The Wyoming PSC's primary regulatory responsibility is rates. The Wyoming PSC does not regulate environmental impacts from facilities or siting (other than how siting influences rates). The IPUC regulates investor-owner or privately-owned utilities that provide gas, water, electricity, or telephone service for profit. The primary responsibility of the Utah PSC is to ensure safe, reliable, adequate, and responsibly priced utility service.	Replace with: "PacifiCorp is an electric utility that transmits electricity via a grid of transmission lines located throughout a six-state region and a distribution system that serves more than 1.7 million retail customers. Rocky Mountain Power delivers electricity to approximately 1 million customers in Utah, Wyoming, and Idaho. As an essential service provider, Rocky Mountain Power is required to operate under the oversight and regulatory controls of the Public Service Commission of Utah, the Wyoming Public Service Commission, and the Idaho Public Utility Commission. Pacific Power, another business unit of PacifiCorp, provides service to approximately 730,000 customers in Oregon, Washington, and California, and is subject to the regulatory oversight of the Oregon Public Utility Commission, the Washington Utilities and Transportation Commission, and the California Public Utilities Commission. Although the objectives of these multiple commissions vary somewhat, they do share a common goal of ensuring utilities such as Rocky Mountain Power provide safe, reliable, adequate, and efficient delivery of electricity."

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	1.3.2	9	1	As regulated utilities, both Idaho Power and Rocky Mountain Power are required to produce and periodically update an Integrated Resource Plan (IRP). The Public Utilities Commissions of the states where these utilities operate review and acknowledge these IRPs and their updates. Part of the planning process includes addressing conservation and other means of reducing or controlling the growth of the demand for electricity among the utilities' customers. When the Public Utilities Commission for a given state acknowledges the IRP, it is agreeing that the balance of demand-side measures and development of additional generation resources, including associated transmission, is appropriate to meet the needs of the customers of its state while complying with the various laws and regulations on renewable energy requirements, carbon emissions, and other energy-related issues. The Proponents have detailed their demand-side management in their respective IRPs, which have been acknowledged by the Public Utilities Commissions for which they were written, and have shown to the satisfaction of the Public Utilities Commissions that additional transmission capacity is needed to meet their customers' needs (RMP 2009; IPC 2009).	The following statement is of concern: "… and have shown to the satisfaction of the Public Utilities Commissions that additional transmission capacity is needed to meet their customers' needs …" The PUC's only acknowledge the IRP and make the following statement about the IRP: "Our acceptance of the Company 2009 IRP should not be interpreted as an endorsement of any particular element of the Plan, nor does it constitute approval of any resource acquisition or proposed action contained in the Plan."
	1.3.2	9	2nd; 2nd sentence	...The Public Utilities Commissions of the states where these utilities operate review and acknowledge these IRPs and their updates. …	Change sentence to reflect that Wyoming does not acknowledge the IRP: …With the exception of Wyoming, the Public Utilities Commissions of the states where these utilities operate review and acknowledge these IRPs and their updates. …
	1.3.2	9	4	**…**The Proponents have detailed their demand-side management in their respective IRPs, which have been acknowledged by the Public Utilities Commissions for which they were written, and have shown to the satisfaction of the Public Utilities Commissions that additional transmission capacity is needed to meet their customers' needs (RMP 2009; IPC 2009).	(RMP, 2009; IPC, 2009): Should be 2011..
	1.3.3.2	10	1	(see Section 1.3.2.3 below for further information).	Incorrect citation. Should say see Section 1.3.**3**.3.
	1.3.3.3	11	T 1.3.1	Table 1.3-1. Rating and Capacity of Paths with and without the Gateway West Project	Tot 4A-proposed Gateway parallel segments- should include 1Wc.
	1.3.3.3	11	T 1.3.1	Table 1.3-1. Rating and Capacity of Paths with and without the Gateway West Project	Section should be expanded to discuss the public safety aspects of reliability as public safety is a criteria for significant impact (40CFR 1508.27 (6)(2)). The Draft EIS should evaluate reliability for each alternative.
	1.3.3.3	11	T1.3.1 Row 5	Column 2: 2,757, Column 6 5,757	We have not increased the rating for Borah West from 2,557 to 2,757. The column values should be 2,575 and 5,557.
	1.3.3.3	11	T1.3.1 Row 6	Column 2: 2,287, Column 6 5,287	The Midpoint West path is now rated at 2,527. The column values should be 2,527 and 5527, respectively

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	1.3.3.3	11	Table 1.3-1, footnote 2	According to the Proponents, "Idaho Power and PacifiCorp will be increasing the rating of the Bridger West and Borah West transmission paths by 200 MW (from 2,200 MW to 2,400 MW for Bridger West and from 2,557 MW to 2,757 MW for Borah West). This increase in transfer capability on the two paths will utilize existing and/or future equipment that will be in-service prior to the addition of the Gateway West project." Also, according to the Proponents, "With the addition of Segment 2 and 3 facilities (Aeolus – Creston – Bridger) plus anticipated resources at Windstar and Aeolus, the West of Bridger transfers would increase by about 3,000 MW. It is anticipated that transfers west of Aeolus (including 500 kV and 230 kV facilities) would be as high as 2,200 MW. Each of the paths listed in Table 1.3-1 are part of the Gateway West Project and are dependent on each other to move power from east to west (Wyoming to Idaho)."	As stated previously, we have not increased the rating for Borah West from 2557 to 2757. So these values should be 2575 and 5557. The footnote should be written as "According to the Proponents, "Idaho Power and PacifiCorp will be increasing the rating of the Bridger West transmission path by 200 MW (from 2,200 MW to 2,400 MW). ..."
	1.3.3.3	12	2	Due to the high megawattage load requirements necessary for the Gateway West Project, multiple high-capacity lines on separate corridors are required in key segments of the Project.	The text in the EIS should be corrected as follows: Due to the high transfer capacity requirements necessary for the Gateway West Project, multiple high-capacity lines on separate corridors are required in key segments of the Project.
	1.3.4	13	1	This Project is designed to provide for the delivery of up to 3,000 MW to the service areas of the Proponents and possibly other markets. Idaho Power forecasts a peakhour load growth of 57 MW per year over the next 10 years. PacifiCorp forecasts the megawatt-hour growth between 2010 and 2019 for Utah, Wyoming, and Oregon will be 6.8 million, 3.7 million, and 1.1 million megawatt-hours, respectively. These forecasts are based on the IRPs prepared by each company as required to fulfill the regulatory requirements and guidelines established by the public utilities commissions of the states served by the Proponents (PacifiCorp 2011; Idaho Power 2009). Each IRP addresses the obligations of each company pursuant to its OATT to plan for and expand its respective transmission systems in a non-discriminatory manner based on the needs of its native load customers, network customers, and all eligible customers that agree to expand their transmission systems. This includes entities that generate or plan to generate electricity, including coal-fired, natural-gas-fired, and renewable energy sources (biogas, wind, and geothermal). As of June 2011, all of the generators requesting transportation on Gateway West were wind energy (PacifiCorp 2011).	The text in the EIS should be corrected as follows: Idaho Power forecasts a peakhour load growth of 69 MW per year over the next 10 years.....(PacifiCorp 2011; Idaho Power 2011).
	1.3.4.1	14	T1.3.2	Table	Should Dave Johnston substation be listed here?
	1.3.4.2	15-16	T 1.3.3	Table 1.3-3. Gateway West Transmission Line Segments	Rephrase "other projects" to state "area of high wind potential"
	1.3.4.2	15-16	T 1.3.3	Table 1.3-3. Gateway West Transmission Line Segments	Add Segment 1Wc - Delete comment, after further review, this is a summary description of segments and not specific to either 1Wa or 1Wc.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	1.6	24	1	The Proponents would negotiate details regarding needed land acquisition across privately owned lands, either in fee or as an easement, for the transmission line and associated facilities (substations, etc.) with each landowner. In exchange for the right to operate the transmission line and facilities, the Proponents would compensate the landowner for the use of the land. The negotiations between the Proponents and the individual landowner could include compensation for loss of use during construction, loss of nonrenewable or other resources, and the restoration of unavoidable damage to property during construction. BLM does not have the legal authority to impose stipulations on private lands. Private landowners may negotiate stipulations as part of their agreements.	Additional clarifiaction should be added so sentence reads "BLM does not have the right to enforce stipulations on private land but have the obligation to recommend stipulations to reduce impacts as part of the NEPA process."
	1.7.2	25	1	The analysis will address the effects of the Proposed Action, No Action Alternative, or Route Alternatives, including construction (short-term), operations and maintenance (long-term), and decommissioning and abandonment (long-term). Construction would occur between 2013 and 2018. Therefore, short-term effects occur within that 5-year time frame. Typically, transmission lines of this size are designed for a working life of 50 years although, in practice, the useful life is often much longer. Therefore, 50 years is considered long term.	The working life of a transmission line is not the same as the length of time of impacts. How long impacts last depends upon the resource affected. The EIS should be revised to disclose, by resource, the duration of long-term impacts. and disclose details regarding the timing and effectiveness of reclamation to support the rationale for the determination of the duration of long-term impacts.
	1.9.2	30	3	Route Alternatives were identified that could reduce the impacts suggested for each issue. The feasibility of each Route Alternative was then considered, such as physical ability to construct the Project in that location and other resource impacts. If it was determined that an Alternative was not feasible, it is described as an Alternative Considered but Eliminated from Detailed Analysis in Chapter 2. Alternative development issues and the alternatives that were considered in detail in the EIS are described in Table 1.9-1.	Feasibility is not the only reason to eliminate an alternative from detailed analysis. It would also be eliminated if it does not reduce resource impacts/conflicts or is out of the scope of the federal decision.
	1.9.3	31	Bullet 2	Could the transmission line be located where it is not visible from residences?	Bullet 2 is not an analysis issue but an alternatives issue.
	1.9.3	38	Bullet 8	How would the Proponents protect against potential vandalism or acts of terrorism to Project structures?	This should go under Section 1.9.4

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Chapter 2 - Alternatives	2				
	2	General		General	There is no clear description of why paralleling an existing line is beneficial for an alternative. The EIS should provide an explanation for why this is beneficial and include why it may also not be beneficial.
	2	General		General	Table 2.1-2: Transmission Line Features Common to all 230kV Segments: Bittern conductor diameter equals 1.345" (not 1.196").
	2	General		General	It would be easier to follow if the plan amendment table occurred after the alternatives description
	2	General		General	Recommend an up-front statement that all mileage is approximate or an estimate. Then delete approximate throughout document and do not use overly precise figures.
	2	General		General	The EIS needs definitions of 'planned', 'proposed' and 'existing'. Additionally, the EIS should clarify that reasonable foreseeable actions are not connected to the proposed action (planned).
Overall Project	2.1				
	2.1	3	1	Description of various ROW widths	Omits 350' ROW for 2 single circuit option
	2.1.1	2	2nd, 2nd sentence	It then proceeds as a double-circuit 500-kV line from Aeolus to Populus (though in Segments 2 and 3 with one of the circuits initially energized at 230 kV between the Aeolus and Anticline Substations). At Populus, the Gateway West Project splits into two single-circuit 500-kV roughly parallel paths.	Change sentence as follows: "...from Aeolus to Populus (through ~~in~~ Segments 2, 3,and 4 ..."
	2.1.1	Overall		All	Refers to 1103 mileage but elsewhere says 1100-should be consistent across document - see comment above re: approximating mileages.
	2.1.1	4	T2.1.2	Table	T line features common to all proposed segments: "One OPGW wire diameter 0.637 inches"- delete "One" so that sentence structure is consistent with others in the section.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.1.1	8	T2.1.2	Project Facility Description Substation Facilities Windstar Substation • Expansion of existing substation. • Developed acreage: increase the fenced area of the 230-kV substation by approximately 10 acre• Existing access road is gravel and would not need extension for Gateway West. • 230-kV circuit breakers and related switching equipment, bus and support structures, potential an transformers, 230-kV shunt capacitor banks. • 230-kV line termination structures approximately 70 feet in height. • Control, protection, and communications equipment. • Addition of new control building within the substation fenced area. • See Figure A-18. Heward Substation • Expansion of existing substation. • Developed acreage: increase the fenced area by approximately 3 acres. • 230-kV circuit breakers and related switching equipment, bus, and support structures. • 230-kV line termination structures approximately 70 feet in height. • Control, protection, and communications equipment. • Addition of new control building within substation fenced area. • See Figure A-19. Aeolus Substation • Expansion of planned substation. • Developed acreage: increase the fenced area by approximately 90 acres. • Expansion of the Aeolus Substation will require upgrading County Route 121. This upgrade will r64 acres of construction disturbance and 33 acres of new permanent roadway. • 500-kV and 230-kV circuit breakers and related switching equipment, bus and support structures, transformer bank, 500-kV shunt reactor bank on bus and on Anticline line, potential and current tr• Control, protection, and communications equipment. • 500-kV line termination structures approximately 135 feet in height. • 230-kV line termination structures approximately 70 feet in height. • New control buildings for the 230-kV and 500-kV substation yards. • New Static Var Compensator that will occupy about 10 to 15 acres in the substation fenced area aa building that contains power electronic equipment and associated cooling equipment. • See Figure A-17. Creston Substation • Proposed new substation. • Developed acreage: Approximately 13 acres fenced with access road. • A gravel access road of approximately 500 feet long would connect to an existing road. • 230-kV circuit breakers and related switching equipment.	Table 2.1-2: Substation at Dave Johnston power plant should be added to the list of substations.
	2.1.1	8	T2.1.2	Table	T line features common to all proposed 230kV line segments. *One OPGW Wire diameter: 0.637 inch. Delete "One" to be consistent and correct diameter is 0.465
	2.1.1	8	T2.1.2	Table	Table 2.1-2: Revise each bullet listing equipment to state: Breakers and related switching equipment, bus and support structures, potential and current transformers, shunt and/or series capacitors and shunt reactors (as required based on system requirements at the time of construction). Leave references to transformer banks, control, protection and communications systems and control buildings. Eliminate all other equipment references.
	2.1.2	8	1st bullet	Expansion of existing substation	This is inaccurate. Heward is a new substation adjacent to the existing Difficulty substation

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	2.1.2	14	2	The alternative of two single-circuit lines in place of one double-circuit line presents some potential advantages for construction schedule, maintainability, and operational availability. For example, as opposed to the heavier double-circuit tower, the lower structure weight and configuration of the single-circuit structure would allow helicopter-aided construction techniques, providing the Proponents with the option of taking less time to construct. Separating the two 500-kV circuits onto two separate structures would allow energized maintenance procedures to proceed more easily than when both circuits are on the same structure. During a structure failure event, if a double-circuit tower fails, both circuits would be out of service. With two single-circuit lines, it is less likely that both circuits would be affected to the same degree during the same event. Thus, the two single-circuit structure alternative would have a higher operational availability during a tower failure event. However, in the isolated situation where spans between structures would exceed 1,800 feet as compared to the average span of 1,200 to 1,300 feet, a parallel circuit separation distance of greater than 175 feet would be required for protection in the unlikely event of towers tipping into the adjacent line because tower heights would need to be increased to allow for greater span lengths. Longitudinal offsets of tall towers may also be required.	The EIS needs to better explain what is meant by helicopter construction, including its inherent limitations as well as impacts. The EIS should also explain when (and with what criteria) would it be used?
	2.1.2	16	T2.1.5	Table	Long-term disturbance differs by resource (see previous comment).
	2.1.3	17		In addition to the proposed self-supporting single-circuit steel lattice 500-kV structure, the Proponents wish to consider an alternative single-circuit 500-kV guyed structure for use where terrain, land cover, and land use allow. During final design, the Proponents would identify specific locations where this structure would be proposed for review and approval. Figure B-6 in Appendix B shows the ROW configuration for the guyed “Delta” and guyed “V” structures. Table 2.1-6 compares the self-supporting and guyed “Delta” structures for several factors.	The EIS should describe what criteria determines when guyed structures would be used instead of conditions when they "can" be used.
.	2.1.3	18	T2.1.6	Table	The long-term disturbance for guyed structures should be different than other structures and the EIS should disclose the use of disk anchors in addition to screw anchors. Also, for either type of anchors, maintenance must be performed periodically to ensure integrity of system so the Proponent will be driving to them (leaving the access road) at least once every ten years.
	2.1.3	18	T2.1.6	Table	Guyed weights are stated as approximate at 29679 and 25113 pounds. This should be rounded up to 25000 and 30000 pounds. See previous comment.
	2.1.3	18	T2.1.6	Table	Maintenance activities are listed as similar. Similar to what? All comparatives in this table should be clarified.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.1.3	20	2	The guyed tower takes up more operational space than the self-supporting structure due to the guy wires but would generally be accommodated within a 250-foot ROW where only a single circuit is planned. Guy wires may extend outside the ROW on the downhill side on steep slopes to maintain an appropriate slope for the guy. For the Design Variation in which two single circuits would be constructed on the same ROW, the guyed structures would be guyed delta towers and would require a ROW 375 feet wide. The extra ROW would be required only where the structure locations the guy anchors and wires would extend beyond the ROW.	This phrase should be re-written to state that guy wires may extend beyond 250' and the ROW would be expanded accordingly.
Alternative Development	2.2				
	2.2.1	23	4	(Add as new 4th paragraph)	WECC language should be inserted as a new paragraph including: a) (WECC Criteria TPL – (001 thru 004) – WECC – 1 – CR _ System Performance Criteria Definitions, b) Common Corridor: Contiguous right-of-way or two parallel right-of-ways with structure centerline separation less than the longest span length of the two transmission circuits at the point of separation or 500 feet, whichever is greater, between the transmission circuits. This separation requirement does not apply to the last five spans of the transmission circuits entering into a substation and c) Adjacent Transmission Circuits: Transmission circuits within a Common Corridor with no other transmission circuits between them. Transmission Lines that cross but are otherwise on separate corridors are not Adjacent Transmission Circuits.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.2.1	23	All	In developing the Proposed Route, the Proponents have reported that they considered a number of options, collected data, identified major features on the ground, coordinated with land management agencies and landowners, and tried to minimize issues and effects related to implementing the proposal. The process used in evaluating alternatives while developing the Proposed Route is documented in the Gateway West Transmission Line Project Siting Study (IPC and RMP 2008, 2009). Alternative routes, substation sites, and structures considered by the Proponents, but not evaluated in detail, are summarized further in the EIS, along with the BLM Interdisciplinary Team (IDT) rationale for not considering them. The Proponents must meet the WECC minimum separation distance (1,500 feet or greater for longer spans) between transmission lines to prevent the loss of multiple circuits from a single event such as a wildland fire. This was a major constraint on what alternatives the Proponents could consider in detail. See Chapter 1, Section 1.3.3.3, for more detail regarding reliability requirements of the regional and national electrical grid. The Proponents' overall Project siting approach was to use the WWE corridor and other designated ROW corridors and existing utility corridors, if feasible, unless there was a compelling reason not to. In many cases the proposed routing closely follows the WWE corridor; however, the WWE corridor is only mapped for federal land, and about half of the lands along the route are privately owned. In some locations, the WWE corridor is too narrow to allow for the minimum separation requirement from existing transmission lines already in the corridor (see discussion above), or no WWE corridor has been designated between required substation interconnections. Reasons for not using the WWE corridors are listed by each segment for the Proposed Route or Route Alternatives. Section 2.4.13 and Table 2.4-2 describe use of the WWE corridor by alternative. Appendix A, Figures A-2 through A-12 show the WWE corridor as determined in the Final PEIS, published November 2008 (DOE and BLM 2008).	The EIS should expand upon the description regarding siting and routing using the information provided in the Companies' comment letter. Additional information can be provided upon request. Referencing the siting study is not adequate.
	2.2.2	23		Rationale for Alternatives Developed by BLM	The EIS should explain how the BLM prioritized which resource was more important than another when evaluating if an alternative would be carried forward, including the criteria and rationale that were used to determine which resource(s) were more important for a given alternative.
No Action Alternative	2.3				
	2.3	24	1	The action triggering this environmental review is described in the Proponents' applications to BLM and the Forest Service for a ROW grant and a Special Use Permit for the portion of the Project on federal lands. The agencies may deny the respective applications or approve the Project with or without conditions. Therefore, the No Action Alternative analyzed in the EIS is the predicted result of the denial of the applications. Under the No Action Alternative, the Gateway West Project would not be constructed (no construction of the new substations, substation expansion, or the transmission line). The objectives of the Project, which include providing increased transmission capacity and a more reliable transmission line system for transport of primarily wind energy to meet existing and future needs (as described in Section 1. 3, Purpose and Need), would not be met. The cumulative effects of the No Action Alternative are found Chapter 4 and summarized in Section 2.10.	The last sentence should be changed to read: "...transport of generation including wind energy to meet..."
Route Action Alternatives	2.4				

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4	Overall			Using the phrases "considered by proponents" vs. "considered by BLM" is prejudicial. The EIS should be explicit when describing BLM's role as lead permitting agency to consider all alternatives and provide impartial evaluation of those suggested by the Proponents either for detailed analysis and/or elimination from detailed analysis.
	2.4	41	5	Because the Project connects a series of three proposed, one planned, and eight existing substations, alternatives proposed by the IDT or suggested by the public and those not considered in detail are described by segment between substations. Table 2.4-1 lists the alternatives considered by segment. The reference points are illustrated in Appendix A, Figures A-2 through A-12 by segment.	Correct last paragraph to give correct substation quantities as follows: Existing: Jim Bridger (tie to Anticline); Expanded: Windstar, Populus, Borah, Midpoint, Hemingway; New: Heward, Aeolus, Creston, Anticline, Cedar Hill (total 11 not 12)
	2.4	42	T2.4.1	All	The EIS needs provide better clarity between this table, the maps and the text. E.g.. Alt 2A, Alt 2B, Alt 2C. Segment 2. For example, use small thumbnail maps in line with the text to focus the reader's attention geographically. In addition, the EIS needs to assist the reader better in its depiction of alternatives eliminated from consideration because they are not currently labeled in the maps to correspond with the text. This applies to all alternative descriptions.
	2.4.1.1.	46	2	Eastern routes between Windstar and Aeolus were considered. In the northern portion of Segment 1E, routes were identified to avoid multiple transmissions lines across landowners located along the existing Dave Johnston – Rock Springs transmission line corridor. The southern end of the Proposed Route was routed by the Proponents to more easily access the wind energy resources north of Medicine Bow. Several routes including routes across as well as mostly east of the Laramie Mountains were considered and eliminated by the Proponents resulting from scenic concerns and public opposition to development of a new Greenfield route4. Among the key factors considered in routing this segment were visual resources, wildlife resources (sage-grouse, big game winter range, and nesting raptors), and geologic features (an ice cave).	Sentence 4 in paragraph 2 needs to be clarified to help make the map understandable.
	2.4.1.2	47	3	At MP 95.8 (point 1Ek) the route would pass just north of the Medicine Bow River and into Aeolus Substation. Between MPs 31.3 and 100.5, a new Greenfield route would be developed. The Proposed Route would be Greenfield for 86.5 miles and parallel an existing transmission line for 9.5 miles.	1E is considered a "greenfield" route between MPs 31.3 and 100.5 based on definition of "greenfield" in the footnote on page 2-46. However, according to definition in the Glossary, all of 1E would be "greenfield". The EIS 'greenfield' definition and application in route descriptions should be consistent throughout the document.
	2.4.1.3	Overall		(Alternatives Eliminated from Detailed Study)	Reasons for eliminating an alternative (bulleted lists) should be related to the Proposed Route similar to what was done for the East of Laramie Mountains alternative. Simply stating the mileage of the alternative within certain habitats is not sufficient justification. In some cases, there is no comparison to the Proposed Route and it is left to the reader to make the assumption that a given alternative has a greater impact or challenge than the Proposed Route.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.1.4, 2.4.2.1	51	Fig A-2	"...After crossing the Carbon/Converse County line, the alternative would proceed parallel to the existing 230-kV line across the west fork of Duck Creek and over the Deer Creek Range. At approximately MP 10, the alternative crosses Ice Cave Mountain, the "Ice Cave," a local historical site that was a July 4th gathering spot for the community where they would meet to celebrate and cut ice to take home to their ice boxes. The alternative then proceeds generally south, passing east of Bates Creek Reservoir before crossing SR 487. The alternative would parallel the west side of SR 487 for about 14 miles to MP 59.5 (of Proposed Route 1W[c]) where the alternative would turn southwest and proceed along the northwest side of the Freezeout Mountains before terminating at the planned Aeolus Substation. During final design, the alignment may need to be modified to avoid the ice caves. The one area where BLM has not designated the existing corridor as a ROW corridor is..."	The EIS should not discuss activities at the Ice Cave as part of its alternatives description for 1E-C unless it treats all alternatives in a similar manner.
	2.4.2.2	52	4	Alternatives for this segment focused on the feasibility of following the existing utility corridor that is also partially a WWE corridor in portions and BLM- and Forest Service-designated ROW corridor in other portions (BLM 2007a, 2008a). They also cross the Bates Hole MA.	The EIS needs to clarify what is meant by "this switch"
	2.4.2.2	53	2	"...At reference points 1Wc and 1x.1, the Proposed Routes for Segments 1W(a) and 1W(c) would each shift alignment approximately 1,500 feet to the southeast. For about 9 miles, 1W(a) would follow the existing Dave Johnston – Rock Springs alignment to before turning southwest at MP 39. From approximately MP 24, Segment 1W(c) would shift 1,500 feet east of the existing Dave Johnston – Rock Springs line before rejoining it at MP 34. This 9-mile shift in alignment was precipitated by landowner comments about potential impacts to an historic ice cave located west of 1W(a) at MP 37.5. The modified alignment avoids the ice cave by approximately 1,500 to 3,000 feet. Upon resuming their original alignments, 1W(a) and 1W(c), along with Alternative 1E-C, proceed generally south passing east of Bates Creek Reservoir before crossing SR 487...."	The EIS should more accurately depict the distance that the modified alternative would avoid the Ice Cave (currently stated as between 1,500 and 3,000 feet).

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.2.3	53	2	The Shirley Basin Alternative was developed in an attempt to avoid crossing the Bates Hole MA with a new 230-kV transmission line; however, avoidance of Bates Hole could not be achieved without substantially affecting several other environmental resources. This alternative includes a 230-kV line on steel H-frame structures that would substitute. for Segment 1W(a), described above. The proposed 230-kV route would exit the Windstar Substation heading generally west, running north of the North Platte River and the I-25 corridor. The alternative passes north of Glenrock, Casper, and the Natrona County International Airport, and then begins to head southwest, crossing U.S. Highway 20/26 and traversing Emigrant Gap Ridge. This alternative would continue southwest for approximately 27 miles until meeting U.S. Highway 220 just north of the Pathfinder NWR. This alternative would then turn south and parallel the Pathfinder Reservoir and NWR about 6 to 7 miles to the west. Next, the alternative would loop east, passing south of the Seminoe Mountains, crossing Seminoe Reservoir and State Park, passing south of the Shirley Mountains, and terminating at the Aeolus Substation near the Medicine Bow River.	As stated in the comment letter, the rationale for eliminating an alternative should state "does not resolve resource conflicts' or similar statement that maintains consistency with NEPA guidance to eliminate alternatives.
	2.4.2.3	54	bullets	This alternative was eliminated from detailed study because, as of the date it was originally proposed, it: • Is 72 miles longer than the Proposed Route; • Traverses historic trail buffers, whereas the Proposed Route avoids them; • Passes through Seminoe State Park, whereas the Proposed Route would avoid this area; • Crosses portions of the Natrona, Greater South Pass, and Hanna sage-grouse core areas; and • Encroaches upon two sage-grouse lek 0.65-mile buffers. 2.4.2.4	All bullets used to describe alternatives eliminated from detailed study should be more explicit regarding the rationale used, e.g.. "Does not resolve sage grouse resource conflicts because..."
	2.4.3.1	55	4	Alternatives focused on an existing 230-kV utility corridor that is also a WWE corridor and a BLM-designated ROW corridor, as well as a relatively direct route. The proposed route location for the Gateway South Project6 was also considered. Among the key factors considered in routing this segment were visual resources visible from the Fort Fred Steele State Historic Site and nearby residences, sage-grouse and big game winter range, mining leases, and SRMAs. The current Proposed Route would have the least impact on Fort Fred Steele and residences among the Route Alternatives.	The alternative's description should not pre-judge impacts of an alternative. The description should show the rationale but let the analysis in Chapter 3 determine impacts.
	2.4.3.2	55	1st footnote	A double-circuit 500-kV transmission line is composed of six electrical phases (two independent circuits of three phases each) and two lightning protection shield wires. One of the lighting protection shield wires is a steel OHGW, and the other is an OPGW. The OPGW contains glass fibers used for communication along the fiber path for data transfer between the Proponents' facilities. The data transferred are required for system control and monitoring.	This description should be introduced earlier in the document.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.3.2	55	2nd footnote	PacifiCorp initiated siting studies for the Gateway South Project, which is a proposed transmission line from Aeolus to Mona in Utah, then from Mona to Crystal in southern Nevada. While part of PacifiCorp's overall expansion of its portion of the western grid, Gateway South is an independent project from Gateway West. See Chapter 4 – Cumulative Effects, for more information on the Gateway South Project	Footnote inaccurately portrays Gateway South as continuing to Nevada which is no longer the case.
	2.4.3.2	56	2	Proceeding west, the Proposed Route passes north of Jefferson Flats, south of the Greenville Dome and a Wyoming penitentiary before crossing SR 71 about 2.4 miles south of Rawlins. Just west of SR 71, the route traverses Coal Creek and Coal Mine Ridge south and parallel to an existing 230-kV line. The route continues at varying distances from the existing line to the proposed Creston Substation. In this last 40-mile segment, the route crosses Hogback Ridge, Red Rim, and SR 789 before reaching the planned Creston Substation south of Wamsutter. The proposed 230-kV circuit would enter and exit this proposed substation and the 500-kV circuit would bypass the substation on single-circuit steel lattice structures. They resume in a double-circuit 500-kV configuration to the Anticline Substation.	"The route continues at varying distances from the existing line to the proposed Creston substation." The EIS should state the minimum separation that was maintained. This statement can be interpreted as separation was not maintained.
	2.4.3.3	57	2	Rawlins Alternative (2h, 2g, 2i) The Rawlins Alternative was initially considered in order to avoid sage-grouse lek buffers by at least 0.65 mile. It would begin at point 2h, diverging south of the Proposed Route (which follows the existing utility corridor and the WWE corridor) by up to 2 miles (at point 2g) on new ROW before rejoining the Proposed Route at point 2i. The alternative would avoid one sage-grouse lek 0.65-mile buffer, but would be 0.5 mile longer than the Proposed Route. However, the BLM, the State of Wyoming, and the WGFD indicated they would prefer that the Project follow the existing utility corridor and the WWE corridor, in lieu of creating Greenfield routes in order to avoid every sage-grouse lek 0.65-mile buffer. The BLM IDT therefore eliminated this alternative from detailed study because, as of the date it was originally proposed, it: • Does not follow existing utility corridor or the WWE corridor.	Rawlins Alternative: rationale for elimination should be related to not resolving resource conflicts vs. not being in compliance.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.3.4	58	2C - all	Alternative 2C was developed in response to the Wyoming Governor's EO 2011-5, which lays out a series of measures for greater sage-grouse core area protection. Stipulation 16 of the EO establishes a transmission line corridor through core population areas. This 2-mile-wide corridor is the State of Wyoming's preferred alternative for routing transmission lines across the southern portion of the state. The EO provides that new transmission lines within this corridor would be considered consistent with the EO. Therefore, BLM has identified an alignment for Alternative 2C that is within the established corridor as an alternative to the Proposed Route and a portion of Alternative 2A, which are outside the corridor but in the same general area. This alternative is approximately 24.4 miles long, compared to 28.4 miles for the corresponding portion of the Proposed Route. Alternative 2C would originate at point 2a.1 and extend southwest through point 2d.1 to a connection with the Proposed Route at point 2e.4. No land use plan amendment would be required for this alternative.	The description of this alternative should describe and/or provide a footnote of the Wyoming Governor's Executive Order (EO) and explain that this alternative would be in compliance with the EO if implemented.
	2.4.3.4	57-58	2A - 2nd paragraph	"...At this point, this alternative would depart from the existing transmission line and head generally southwest, crossing to the south side of I-80 and U.S. Highway 287/30 at MP 25.8, and continuing another 2.5 miles to a location just southeast of Grenville Dome and approximately 2 miles southeast of Sinclair. This alternative would be substantially more visible from the Fort Fred Steele State Historic site than the Proposed Route would be. This alternative would parallel existing transmission lines for 26 miles." Alt 2B: "Alternative 2B was originally the Proposed Route; however, concerns by rural residents as well as issues related to visual impacts to a historic site resulted in the Proponents changing this route segment from proposed to a feasible alternative. This alternative is approximately 6.2 miles long, compared to 7.0 miles of the corresponding portion for the Proposed Route. This alternative consists of the original proposed alignment in the vicinity of Fort Fred Steele State Historic site. It would cross immediately south of the historic site main compound. This alternative would make maximum use of following an existing corridor and the designated WWE corridor. No land use plan amendment would be required for this alternative"	The rationale for Alternate 2A and 2B is confusing and almost sounds like rationale that would be used for elimination. Was it initially considered for following the existing corridor but no longer considered for that reason?
	2.4.4.3	60	1	This alternative was eliminated from detailed study because as of the date it was originally proposed: • The WWE corridor along this route contains extensive development including existing roads, railroads, mining, and oil and gas operations, which present substantial constraints to the design and operation of the Gateway West transmission facilities	Tipton Alternative: Bullet should be based on not meeting P&N or technical infeasibility not "substation constraints".

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.5.1	61	3rd bullet from bottom of page	The Rock Springs Subsegment extends approximately 52 miles to the west of the Anticline Substation. It is the only subsegment where a designated WWE corridor exists. It is approximately 52 miles west from the proposed Anticline Substation (from point 4 to 4b along the Proposed Route). The most important constraint in this subsegment is the Seedskadee NWR along the Green River. Other constraints include trona and coal mining, sage-grouse leks and buffers and core area, proximity to the Spring Canyon Subdivision, VRM Class II lands, and raptor nests and buffers. The primary routing opportunities are the existing transmission corridor and the WWE corridor.	Rock Springs Subsegment: Is it appropriate to label a restraint as "most important", in this case the Seedskadee NWR. The term "most important" is a value-based judgment and should be deleted.
	2.4.5.2	63	1,2,3	The Proposed Route remains parallel and offset about 1,500 feet northeast of the existing 345-kV corridor crossing Bear Lake Valley, U.S. Highway 89, and the Bear River before proceeding to the eastern boundary of the Caribou-Targhee NF at MP 160. The Proposed Route crosses about 9.2 miles within the NF boundary on a new ROW north of, but offset from, the existing 345-kV line as proposed by the Forest Service. The route then rejoins the existing corridor on the west side of SR 34 crossing Mound Valley and the Bear River again. At MP 176, the Proposed Route leaves the existing 345-kV corridor and proceeds west passing along the north side of Dry Hollow Mountain and angling northwest toward the community of Downey. About 2 miles south of Downey, the Proposed Route crosses U.S. Highway 91 and the Marsh Valley. It then continues northwest to the Populus Substation located about 1.3 miles west of Downey. The Proposed Route would be within the Greater South Pass Sage-Grouse Core Area adjacent to the existing 345-kV transmission lines. It would then cross the Seedskadee Sage-Grouse Core Area (Seedskadee Core Area) from approximately MPs 58 to 70, adjacent to existing 345-kV lines and Greenfield route from MPs 70 to 71. The route would then cross approximately 14 miles of the Fontenelle Sage-Grouse Core Area (Fontenelle Core Area) and 4 miles of the Sage Sage-Grouse Core Area (Sage Core Area) on a Greenfield route. Of its 203.0-mile length, 80.4 miles would be parallel to existing transmission lines. The Proposed Route would neither be in conformance with the management direction provided in the Kemmerer Green River RMPs nor would it be consistent with the Caribou Forest Plan. Table 2.2-1 describes the management direction, the proposed amendment, and the sections of the Draft EIS where the effects are analyzed. Appendix F provides the proposed amendment and Appendix G provides the analysis and rationale for visual resources amendments.	In general, the EIS needs to better describe the EO . In this case, the EIS needs to clarify that passing through core areas adjacent to existing lines is consistent with the EO. Throughout the EIS, the description of alternatives should state if a given alternative is or is not consistent with the EO, if applicable.
	2.4.5.2	63	3	The Proposed Route would neither be in conformance with the management direction provided in the Kemmerer Green River RMPs nor would it be consistent with the Caribou Forest Plan. Table 2.2-1 describes the management direction, the proposed amendment, and the sections of the Draft EIS where the effects are analyzed. Appendix F provides the proposed amendment and Appendix G provides the analysis and rationale for visual resources amendments.	The EIS text should be changed from "neither in conformance" to "would require a land use plan amendment" An alternative would not be out of conformance until a decision was made and a necessary plan amendment was not approved. This applies for wherever "Not in conformance" appears in document.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.5.2	63	2	At MP 176, the Proposed Route leaves the existing 345-kV corridor and proceeds west passing along the north side of Dry Hollow Mountain and angling northwest toward the community of Downey. About 2 miles south of Downey, the Proposed Route crosses U.S. Highway 91 and the Marsh Valley. It then continues northwest to the Populus Substation located about 1.3 miles west of Downey. The Proposed Route would be within the Greater South Pass Sage-Grouse Core Area adjacent to the existing 345-kV transmission lines. It would then cross the Seedskadee Sage-Grouse Core Area (Seedskadee Core Area) from approximately MPs 58 to 70, adjacent to existing 345-kV lines and Greenfield route from MPs 70 to 71. The route would then cross approximately 14 miles of the Fontenelle Sage-Grouse Core Area (Fontenelle Core Area) and 4 miles of the Sage Sage-Grouse Core Area (Sage Core Area) on a Greenfield route. Of its 203.0-mile length, 80.4 miles would be parallel to existing transmission lines.	South Pass at Seedskadee are in Wyoming not near Downey, ID. This paragraph implies that sage grouse areas are near Downey and Marsh Valley. Need to correct descriptions of locations in FEIS.
	2.4.5.3	64	last	Figure 2.4-1 shows an area in southwestern Wyoming in the Kemmerer BLM FO that contains important historic, visual, and natural resources. To date, the Proponents and the BLM have proposed a total of seven alternatives in this area. Each alternative was designed to reduce impact on one suite of resources; however, each of these alternatives would result in unavoidable impacts on important resources. These alternatives and their resulting impacts are discussed in the following text.	The sentence should be re-written to eliminate opinion regarding what is 'important' and cite the analysis instead.
	2.4.5.3	66	2 and 4	The Gateway West Project proposes to carry up to 3,000 MW on a double-circuit 500-kV structure through this area. When combined with energy carried on the three 345-kV structures, the total is about 5,400 MW. While it would be technically feasible to carry this load on one set of double-circuit 765-kV structures through this area, it would be prohibitively expensive for the following reasons:	"prohibitively expensive" and "out of proportion" are not good reasons to eliminate an alternative from detailed analysis. See previous comment regarding improving the description of the rationale that was used to eliminate alternatives.
	2.4.5.3	66	bullets at top of page	* The Western Interconnection does not include 765-kV systems, and there are no substations or transformers in the Western grid that could interconnect with this voltage; • Therefore, to allow for this possibility, new substations would need to be constructed, or existing substations expanded, to accommodate very large new transformers just for this one line. If such a substation or expansion were created near the Jim Bridger Power Plant, then the new 765-kV line would have to be over 150 miles long, from Bridger to Cokeville; and • A large new substation would have to be built at Cokeville to allow for the 345-kV line that turns north near Cokeville to continue to supply power to the Three Mile Knoll Substation.	The EIS could combine the 1st and 2nd bullets.
	2.4.5.3	67	last	The Proponents have stated that they cannot support this alternative. System studies have not been conducted on this alternative but it is reasonable to assume that the reliability requirements for common corridor outages would not be met and that...	The EIS should eliminate statements such as "the Proponents have stated they cannot support this alternative". In this case, the rationale that this alternative does not meet the Purpose and Need relative to reliability should be cited as the rationale. See previous comment. .

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.5.3	68	2	Based on the reliability concerns raised by the Proponents, this alternative was eliminated from detailed analysis.	The EIS should eliminate the statement "Based on the reliability concerns raised by the Proponents, this alternative was eliminated from detailed analysis." This needs to be directed more to not meeting the Purpose and Need. See previous comment.
	2.4.5.3	69	2B - all	Kemmerer Alternative B (4b.2, 4b.9, 4b.10, 4b.11, 4b.12) In January 2008, the BLM Kemmerer FO proposed a route alternative to the south of the Proposed Route in order to avoid environmental constraints along the existing 345-kV transmission lines. The Kemmerer Alternative B incorporates segments proposed by both the Proponents and the Kemmerer FO. This alternative departs from the feasible alternatives just west of Route 189 and trends west, crossing active trona mines owned by FMC, to the area just west of the Chevron coal mine south of the community of Kemmerer (point 4b.2). From this point, the Kemmerer Alternative B would proceed to the Wyoming-Utah border south of the Cokeville Meadows NWR through 20.2 miles of Sage Core Area. At the state line, the alternative would turn north to point 4b.12. This area is less disturbed than areas to the north, is within sage-grouse core area, and is big game crucial winter range. This alternative was eliminated from detailed study because, it: • Crosses through sage-grouse core areas; • Crosses through big game crucial winter range; and • The WGFD expressed concerned that this route alternative would cross high quality habitat with a new ROW.	The description of Kemmerer Alternative B should expand all elimination reasons in similar fashion to those used for Kemmerer Alternative A. Also, the EIS should clarify the last bullet as to what habitat is high quality.
	2.4.5.3	70	5th bullet: mid-page	* Results in more environmental effects than the Proposed Route.	For the Populus alternative, the statement "more environmental effects than proposed action" is too vague. What are the exact effects?
	2.4.6.3	75	6th bullet	* Because topographic constraints do not allow adequate space to accommodate two transmission lines in this area, it would not allow for co-location with Segment 7.	Deep Creek Alternative A: 6th bullet should discuss that this alternative doesn't meet the purpose and need to provide safe and reliable energy.
	2.4.8.4	89	3	This alternative is studied in detail although it would cross the Sawtooth NF for 12.1 miles, in multiple locations, most of which is high-quality habitat, and the alternative would be all Greenfield. Also, this alternative would result in substantially more impacts to raptors and sage-grouse compared to the Proposed Route. Overall, this alternative would result in measurably more environmental effects than the Proposed Route. However, the Proponents consider this alternative as superior to Alternative 7I. Of its 127.5-mile length, 116.5 miles would be Greenfield and 11.0 miles would parallel. existing transmission lines.	Alternative 7H: Makes several references to the impacts this alternative would have. Those should be reserved for the impacts analysis section.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.4.92	92	last	Several plan amendments would be needed to make the Proposed Route conform with BLM land use plans in effect. The Kuna MFP would need an amendment to allow the transmission line outside of existing corridors. The SRBOP RMP would need amendments to VRM classes, to permit surface-disturbing activity within 0.5 mile of sensitive plant habitat, and to allow a utility corridor outside the two utility corridors identified in the plan. In addition, the Proposed Route would not be in conformance with the management direction provided in the Bennett Hills/Timmerman and SRBOP RMPs and the Kuna MFP. An amendment would be needed to allow the Proposed Route to be constructed within this non-motorized area; however, the Boise District BLM office has stated that the RMP could not be amended in this way to meet objectives. Alternative 8E would avoid this area. Table 2.2-1 describes the management direction, the proposed amendment, and the sections of the Draft EIS where the effects are analyzed. Appendix F provides the proposed amendment and Appendix G provides the analysis and rationale for visual resources.	This description is a good example of language for alternatives that would require a land use plan amendment and should serve as a template for other such descriptions.
	2.4.9.3	95	1st bullet	Gooding North Alternative: Is 1.8 miles more VRM Class I and II land than the Proposed Route;	Gooding North Alternative: "is 1.8 miles more" should be changed to "Crosses 1.8 miles more"
	2.4.9.3	96	5th bullet	Cross 32.4 miles more of steep slope areas than the Proposed Route.	The EIS needs to define steep slopes.
	2.4.10.3	102	4th bullet	The Proposed Route was agreed upon through agency consultation as a means to avoid conflicts with the Air Force Range and the State Park, whereas this alternate was not; and	For the Saylor Creek Alternative, the statement that the "Proposed Action was agreed upon to avoid conflicts, whereas this alternative was not agreed upon" is a poor qualification. The EIS should be reworded to state this alternative has potentially more conflicts or proximity to the Range and State Park. Is it not clear what conflicts it presents that require it to be eliminated.
	2.4.X.3	47-109	Alts Eliminated	All	If an alternative is eliminated because it doesn't resolve resource conflict compared to proposed action, the EIS' explanation should explicitly state what impacts apply and be clear that the comparison is to the proposed action.
	2.4.X.3	47-109	Alts Eliminated	All	If an alternative is eliminated because it is substantially similar to another alternative already being considered in detail, the EIS should note which alternative it is and explain how it is the same.
	2.4.X.3	47-109	Alts Eliminated	All	If an alternative is eliminated because it would not ensure/provide safe and viable energy, the EIS' explanation/rationale should state that the alternative would not meet the purpose and need.
	2.4.X.3	47-109	Alts Eliminated	All	If an alternative is eliminated because it would be technically or economically infeasible, the rationale should reflect that the Proponent would not/could not do the project if the alternative were selected.
Substation Alternatives	2.5				
	2.5	General		General	Descriptions of equipment that will be put in substations should be more general; it currently is too prescriptive and may not be what really is necessary.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.5	General		General	In general Section 2.5 needs to correct substations description: Proposed should be Creston, Anticline , Cedar Hill, Aeolus and Heward; and Existing should be Windstar, Populus, Borah, Midpoint, Jim Bridger and Hemingway.
	2.5.1.2	115	1	The proposed Anticline Substation is located about 2.5 miles southeast of the Jim Bridger Power Plant, along the east side of Deadman Draw, approximately 30 miles east of Rock Springs, Wyoming, as shown on Appendix A, Figure A-14. The proposed substation would consist of a new 500-kV yard constructed southeast of the power plant occupying a fenced area of about 125 acres on private land (Appendix A, Figure A-4). Equipment to be installed within the fenced area would include 500-kV and 345-kV circuit breaker bays and associated equipment, bus supports, high-voltage switches, transmission line termination structures, 500-kV transformers, 345-kV phase shifting transformer, 500-kV reactors, 500-kV series capacitors, and a new control building to house communications and control equipment. Access to the new 500-kV yard would require improving about 0.3-mile of existing dirt road to a 20- to 24-foot all-weather surface road between the existing Jim Bridger Power Plant access road and proposed Anticline Substation fenceline, improved highway access approaches, and a UPRR crossing. Within the substation site, approximately 0.4 mile of intermittent stream channel would be realigned to provide site drainage.	Revise "Jim Bridger Power Plant Access Road" to "Highway 377".
	2.5.1.2	115	3	The existing Jim Bridger Power Plant has separate 230-kV and 345-kV substation yards located east and west of the plant, respectively (Appendix A, Figure A-15). Each substation would require modifications and interconnecting transmission lines as part of Gateway West.	This paragraph states that JB Power Plant has separate 230kV and 345kV yards. They are not separate and they are not east and west. They are more southwest per Figure A-15 in Appendix A.
	2.5.1.2	115-116	last bullet	8 A 5.5-mile interconnecting 345-kV transmission line between the new Anticline Substation 500-kV yard and the existing Jim Bridger Substation 345-kV yard (Segment 3A) would be required to electrically connect the two substations. The Jim Bridger 345-kV yard would be expanded by about 10 acres to accommodate the line termination position.	The sentence should be re-written as "Expanded by about 10 acres to accommodate the line termination position <u>and relocate existing shunt capacitor banks</u>."
	2.5.1.2	116	2nd	In first full paragraph, structure description doesn't match Table 2.1.2 (pg 2-6). Should be steel H-frame or correct Table 2.1.6. Which of these is right?	Lattice steel towers are not being considered for the 230kV and 345kV tie lines to Jim Bridger. These will be steel H-frame structures.
	2.5.2.1	117	last	The Aeolus Substation site is located in Carbon County approximately 10 miles west of Medicine Bow, Wyoming, on private land as shown in Appendix A, Figure A-17. The substation would be the southern terminus of Segment 1. The Aeolus Substation would be expanded to electrically terminate the two new 230-kV lines (1W[a] and 1E), the reconstructed portion of the Dave Johnston – Rock Springs 230-kV line between the Dave Johnston Power Plant and the planned Aeolus Substation, and the two new transmission lines that would extend west to the Creston and Anticline Substations (Segment 2 and 3). One of the new westerly lines to Creston and Anticline would be initially energized at 230 kV and the other line would be energized at 500 kV. The addition of these new facilities would increase the size of the Aeolus Substation fenced area by about 90 acres (Appendix A, Figure A-17).	For clarity, the EIS should indicate that the reconstructed portion of the Dave Johnston - Rock Springs 230kV line is Segment 1W[c]. This is not specifically defined in the paragraph.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.5.2.1	119	2	Existing Conditions: CR 121 is currently a single-lane road, about 20 feet wide and about 11 miles long, from SR 30 to the Aeolus Substation. It is in poor condition with a thin layer of gravel over a clay base and without turnouts. It includes a single-lane bridge over the Medicine Bow River built in 1914 and refurbished with a metal deck around 1972 (see Figure 2.5-2). The bridge was recently inspected by the Wyoming Department of Transportation and found to be in poor structural condition. Its current weight limitations include a 10-ton weight limit for single axle trucks and 13-ton limit for multiple axle trucks, which would not accommodate the heavy haul transporters.	Revise "SR30" to "Highway 30" (2 places)
	2.5.3	120	All	The substations described in this section are already operational. Alternative locations for these substations were not considered. Expansion of the 345-kV Jim Bridger Substation is described in conjunction with the proposed Anticline Substation (Section 2.5.1.2). The following describes their locations and the modifications proposed as part of the Gateway West project.	Substation at Dave Johnston power plant should be added to the Existing Substations section (2.5.3) as Segment 1W[c] connects to it.
	2.5.3.1	120	3	The control house would be expanded and/or added to accommodate the necessary system communications and control equipment. The existing access road would be used to reach the site.	Add after the 2nd sentence in the 2nd paragraph as follows: Each bay will contain the high-voltage breakers and switches, bus supports and control equipment. Revise the 3rd paragraph as follows: A new control house will be added to house the communications and control equipment for the proposed Gateway transmission lines.
	2.5.3.2	120	last	The Heward Substation would be an expansion of the existing Difficulty Substation, which is located about 45 miles from Bessemer Bend and approximately 34 miles north of Medicine Bow, Wyoming, as shown on Appendix A, Figure A-19. The Heward expansion would add a new 230-kV yard to the west and immediately adjacent to the existing substation fenced area. The substation expansion would be required because the existing 230-kV bus and other equipment within the Difficulty Substation is under-rated for accommodating the additional electrical capacity that would be added by rebuilding and reconductoring a portion of the existing Dave Johnston – Rock Springs 230-kV line between the Dave Johnston Power Plant and the planned Aeolus Substation (Proposed Route 1W(c)). Adding the new 230-kV yard would increase the flow through capacity of the Difficulty 230-kV bus and also facilitate maintaining power to Difficulty Substation customers during construction	Heward Substation: "...would be an expansion of the existing Difficulty Substation" Change to "a new substation adjacent to the existing Difficulty Substation" then correct remaining section as needed. See previous comment.
Design Alternatives	2.6				
	2.6.1	123	General	General	The proponent is still considering dull galvanized steel for all H-frame structures. This should be updated throughout the document. Project description should be modified to use dull galvanized (rather than weathering steel) for h-frame structures as a visual mitigation measure. This could be used where structures are skylined vs the darker weathering steel.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.6.2.1	123	T2.6.1	Table	Segments 3A and 3B should be added to Table 2.6-1: 3A - New Single-Circuit 345kV, Steel H-frame 3B - New Single-Circuit 230kV, Steel H-frame Add segments 3A and 3B to the table. 3A- 345kV -steel H frames: 3B -230kV-steel H frames. Comment: Identify all tie lines in document as an example.
	2.6.2.1	124	last 3 paragraphs	Vertical Steel Lattice The proposed double-circuit 500-kV structures use a horizontal delta configuration to reduce height. For the vertical steel lattice tower, one circuit of three phases is installed on each side of the tower in a vertical configuration. While the vertical configuration is lower in cost for some projects, the average height of the vertical configuration tower would have to be over 200 feet for the Gateway West Project to satisfy the Proponents required phase to phase spacing for live-line maintenance activities. Federal Aviation Administration regulations require structures over 200 feet in height to be lighted (USDOT 2000). ... Tubular H-Frame The double-circuit 500-kV tubular H-frame horizontal configurations represent the highest unit costs and have higher construction impacts than those of lattice towers. While the lattice structures are designed with four widely-spaced feet to provide lateral stability against the weight of the conductor and adverse environmental conditions, including high winds and ice storms, tubular H-frame structures have deeper and wider diameter foundations, which require more concrete per structure to provide the same lateral stability. The structures also weigh more than the lattice structures, requiring larger cranes for their installation and wider roads with greater surface stability.	What is listed under the heading are 2 structure types NOT carried forward for detailed analysis. This is confusing. Add "Design Structures Eliminated From Detailed Analysis" as subsection of Section 2.6 for clarity.
	2.6.2.2	126	all	Lattice The Proponents considered steel lattice towers where 230-kV line configurations are needed. Unlike the 500-kV configuration, lattice towers do not offer the same advantages over the H-frame configuration at the 230-kV voltage level. Smaller towers can be used at 230 kV than at 500 kV due to the reduced conductor to tower and conductor to ground spacing requirements. Because of the smaller size of the structures, it is feasible to design and construct H-frame structures at a lower cost than for lattice towers. Further, the H-frame structures provide advantages in controlling perching opportunities for raptors, crows, and ravens and were therefore proposed by the Proponents. Because there is no economic or environmental advantage to using lattice towers, only the H-frame structure was carried forward for detailed analysis.	The EIS should discuss why an H frame is a better perch discourager and provide a defensible justification of why H frames have less impacts than lattice.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.6.2.3	126	1	Tubular single-pole tangent structures are self-supporting but angles and corners typically require guyed structures. While H-frames can achieve lateral stability against the weight of the conductor and ice and wind conditions by virtue of the braced H-frame design, single-pole structures require deeper foundations and heavier steel poles to provide the same lateral stability, because each pole must be designed to independently withstand operational and ice and wind loads. Single-pole structures are more expensive to purchase and install, offer no technical or operational advantage over the proposed H-frame structure and were therefore not carried into detailed analysis.	Single Circuit Tubular H frame: Alternative was carried forward if lattice towers present adverse impacts. What impact? The EIS should be specific and cite defensible rationale. .
	2.6.3	127	T 2.6.3	Table (ROW Width 250 feet)	Long Term Ground Disturbance: Remove "ROW width" because the entire ROW width is not equivalent to long term ground disturbance.
	2.6.3.1	128	overall	All	The EIS should cite safety and reliability as well as increased impacts caused by extensive operational maintenance as the primary criteria to eliminate painting.
	2.6.4	129	T2.6.3	Table	This is only a partial replication of data in Table 2.6.2 with extra items. The EIS should use one comprehensive table of advantages/disadvantages of all types and remove extraneous tables to simplify and remove opportunity for inconsistency.
	2.6.4	130	1st bullet	* Cost—One major reason that utilities do not normally install extra high voltage transmission lines underground is that the construction costs are increased by 12 to 17 times over an overhead counterpart (National Grid 2009). These additional costs must be approved by the public utilities commission and are passed on to all the ratepayers, not just those near the area of underground installation.	Cost is not the primary factor and shouldn't be shown as the first bullet. Greater impacts than other alternatives is the main reason it would be eliminated from detailed analysis.
	2.6.4.2	134	3	For both the 230-kV and 500-kV voltage levels, the installation of underground transmission lines uses similar techniques. Large open trench installation or the more costly trenchless technologies are utilized to place the cables underground. Construction includes, but may not be limited to clearing of the ROW, trenching, installation of duct banks or pipe networks, installation of vaults, cable splicing and terminating, and termination structure construction.	The extensive impacts caused by the construction process should go to the forefront of why underground was eliminated.
Components Common to All Actions Alts	2.7				
	2.7.5	144	T2.7.1	The proposed 230-kV transmission lines between Windstar and Aeolus would use a steel H-frame structure configuration similar to the existing 230-kV in the same general location. The steel pole H-frame would utilize self weathering steel. Weathering steel is manufactured from a group of steel alloys that were developed to eliminate the need for painting. This type of steel alloy forms a stable rust-like appearance if exposed to the weather for several years	The EIS should explain how long it takes for weathered steel to take on a rust appearance and in the interim, there may be short-term impacts. For example, they arrive oxidized and continue to darken over several months.
	2.7.5	144	T2.7.1		As per previous comment, the proponents are still considering dull galvanized steel for all H-frame structures. This should be updated throughout the document.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.7.5	145	T2.7-1 (Vis-12)	Where the route would be visible on timbered slopes, limit tree removal to areas required for safety rather than from the entire ROW in order to prevent a linear feature on the landscape from clear-cutting trees. Vegetation removal requirements will consider Appendix A, "Standards and Practices for Electric system reliability"	The "area required for safety" is the entire ROW. A requirement that we not remove trees in the ROW will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, adversely affect system reliability, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. If land managers want to prevent linear features we can feather the right of way, as outlined in the last paragraph of Section 3.6.2.2, page 21 for the Medicine Bow-Routt and Caribou-Targhee NFs.
	2.7.5	146	T2.7.1	Table	CR in Acronyms/Abbreviations says county route but that is not what CR means in this table. Need consistency. All acronyms/abbreviations in this table are missing from list.
	2.7.5	149	T2.7-1 (Veg-14)	Where the route would be visible on timbered slopes on lands managed by the Kemmerer FO, allow tree removal only at structure locations and where required for safety rather than from the entire ROW in order to prevent a linear feature on the landscape from clear-cutting trees. Vegetation removal requirements will consider Appendix A, Key Standards Relating to Electric System Reliability and Safety, of the MOU with the Edison Electric Institute (2006).	This is completely unacceptable as a mitigation measure and is a direct contradiction to the intent of the MOU cited. The MOU's intent is to perform cover type conversion away from vegetation communities that could interfere with the conductors at some time in their life-cycle toward plant communities that will not. A requirement that we not remove trees except at structure locations will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. If land managers want to prevent linear features we can feather the right of way, as outlined in the last paragraph of Section 3.6.2.2, page 21 for the Medicine Bow-Routt and Caribou-Targhee NFs.
Summary Comparison of Effects	2.8				
	2.8.1	179	3	Alternative 2B was originally considered by the Proponents as the Proposed Route. Due to local landowner concerns and visual impacts to visitors to the Fort Fred Steele State Historic Site located on the North Platte River as well as several eagle nests in the area, the Proponents relocated the Proposed Route several miles to the south and BLM left the original Proposed Route as an alternative to be analyzed in detail. This alternative would not impact sage-grouse core area and would affect slightly less big game winter range than the comparison portion of the Proposed Route (10.4 miles vs. 16.8). Alternative 2B would affect fewer acres of mineral leases (34 acres vs. 54). Alternative 2B would cross the Continental Divide SRMA whereas the corresponding portion of the Proposed Route would cross the Continental Divide SRMA and the North Platte River SRMA. Alternative 2B would be less visible from the Fort Fred Steele State Historic Site than the comparison portion of the Proposed Route.	States Alternative 2B would be less visible from Fort Steele. It is MORE visible so statement needs to be corrected.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.8.5	185	4	Alternative 5D was the Proponents' original Proposed Route, but issues were raised by local landowners about impacts to agricultural land. The Proponents agreed to move their Proposed Route several miles to the east and keep the original Proposed Route as an alternative to be analyzed in detail (Alternative 5D). Alternative 5D would affect more agricultural land than would be impacted by the comparison portion of the Proposed Route. Additionally, Alternative 5D would be more visible from residences in the Rockland Valley compared to the Proposed Route, which takes better advantage of topography to minimize visual impacts from the valley. However, it would cross within 1,000 feet of an elementary school (the only alternative to do so) and 24 residences, compared to 10 for the comparison portion of the Proposed Route.	5D does not come within 1000 feet of an elementary school; 5A does (Arbon Elementary) so this needs to be corrected. Also states that 5D is the only alternative to do so. Alternative 7A follows the same route as 5A near the same elementary.
	2.8.7	195	2	Alternative 8A was developed to maximize use of the WWE corridor. This alternative would cross 6.2 miles of VRM Class I (but no Class II) land whereas the comparison portion of the Proposed Route would cross 3.2 miles of class I and 8.1 miles of Class II. The comparison portion of the Proposed Route would be close to the communities of Hagerman and Glenns Ferry, the Hagerman Fossil Beds, and the Billingsley Creek Wildlife MA. This alternative would impact more cultural resources than its comparison portion of the Proposed Route (84 vs. 33). It would cross within 1,000 feet of 46 residences compared to 14 for the comparison portion of the Proposed Route. It would affect slightly less agricultural land (182 vs. 188 acres).	Misstates the comparison portion of proposed route as close to Hagerman, etc. Should state Alternative 8A: Proposed route is not close to Hagerman, etc.
Preferred Alternatives	2.9				
	2.9	203	2	There is no impact-free route choice for a large transmission line. In some segments of the Gateway West Project, where there are multiple resource conflicts, alternative routes often show dramatically different impacts on certain resources, and some alternatives were put forward to emphasize protection of one resource or land value over another. There are substantial segments of the public than have not had a chance to express their opinions on the issues and alternatives so far proposed. It is reasonable to expect those entities to propose additional alternatives or perhaps to present new information on alternatives currently considered.	Statement "substantial segment of public that have not had a chance to express their opinion..." should be better described so as to not misrepresent the extensive efforts conducted by the agencies and BLM to engage stakeholders and public at large.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.9.1	203	2	The BLM has typically identified preferred alternatives in most of the Draft EISs it has prepared. The BLM portion of the Project approval covers only the federal lands it administers, between 40 and 50 percent of the total length. It does not extend to state-managed or private lands. The BLM recognizes that any route it proposes to approve influences that route's location on adjacent private lands. Faced with this multiple use management situation, it is prudent for the BLM to reserve its identification of a preferred alternative until it has received input on the routes from all sectors of the public. Therefore, the BLM will defer identification of its preferred alternative until the Final EIS for the above reasons. Following the public comment period on the Draft EIS, the BLM pledges to work collaboratively with cooperating agencies and the public to reach a consensus on the preferred route for the Gateway West Project. In the absence of a consensus, the BLM will identify in the Final EIS its preferred alternative based on its multiple-use mandate in the FLPMA. In consideration of the potential changes to the environmental analysis between the draft and final document, the BLM will hold a sufficient public comment period on the Final EIS.	"pledges to work collaboratively with cooperating agencies and the public to reach consensus." Should be deleted as consensus is not possible nor is it required. Can change to address concerns to the extent practical within FLPMA requirements. Suggest re-wording as: "FLPMA encourages the BLM to collaborate with agencies, stakeholders, and the public during the NEPA process and to use that information to inform the range of alternatives considered and the scope of the analysis in the NEPA document. Additionally, it encourages the BLM to be as consistent as possible with local land use plans within the confines of their FLPMA responsibilities. Neither FLPMA nor any other BLM regulation requires that the BLM's decision be based on consensus. The BLM's decision has to be based on their requirements under FLPMA, including the requirement to meet the project purpose and need while managing for the long-term sustainability of project area resources. We request that this section be revised accordingly. The pledge to reach consensus for this project decision is not based on BLM's regulatory mandate and will foster an expectation with the public that cannot be met by the BLM."
	2.9.1	203	4	The BLM has typically identified preferred alternatives in most of the Draft EISs it has prepared. The BLM portion of the Project approval covers only the federal lands it administers, between 40 and 50 percent of the total length. It does not extend to state-managed or private lands. The BLM recognizes that any route it proposes to approve influences that route's location on adjacent private lands. Faced with this multiple use management situation, it is prudent for the BLM to reserve its identification of a preferred alternative until it has received input on the routes from all sectors of the public. Therefore, the BLM will defer identification of its preferred alternative until the Final EIS for the above reasons. Following the public comment period on the Draft EIS, the BLM pledges to work collaboratively with cooperating agencies and the public to reach a consensus on the preferred route for the Gateway West Project. In the absence of a consensus, the BLM will identify in the Final EIS its preferred alternative based on its multiple-use mandate in the FLPMA. In consideration of the potential changes to the environmental analysis between the draft and final document, the BLM will hold a sufficient public comment period on the Final EIS.	Decision for BLM to ID preferred alternative is predicated upon false assumption that FEIS will generate input from "all" sectors of the public. The sentence should be re-written to clarify that the BLM decision will be made after it has solicited input from the public, not necessarily received input from all sectors of the public.
	2.9.2	204	overall	All	The EIS should add maps showing the designated sage grouse core area in relationship to routes in this section.
	2.9.2.4	205	1	Numerous conflicts exist with transmission routing along this segment and a number of alternatives have been developed to address these concerns. However, to date it has not been possible to identify a single alternative that minimizes to acceptable levels impacts to all the resources that occur along this segment	Define "it" as State of Wyoming
	2.9.2.4	205	3	This alternative may, however, result in higher impacts to historic trails and therefore mitigation should be developed, with input from the SHPO, to adequately compensate for impacts to the trails.	Change "compensate" to mitigate.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.9.3	206	1	Power County, a cooperating agency, passed ordinance No. 2010-03 on November 23, 2009, designating two alternatives as preferred for those portions of Segments 5 and 7 in Power County (Power County 2009a). The County states that the Proposed Route would have extremely detrimental impacts on the health, safety, welfare, and economic viability of the County, particularly irrigated agriculture and future economic development within the County.	This statement should be deleted because it is not defensible unless scientific studies can be appended to the document regarding how the "proposed route would have extremely detrimental impacts to health, safety, welfare and economic viability in the county." As it reads, it is an opinion which should not be included in the EIS.
	2.9.6	207	2	Owyhee County, a cooperating agency, identified two preferred alternatives to the Proposed Route in Segment 9 by letter dated September 1, 2009 (Owyhee County, 2009). Of these routes, the Northern Route (9D) is strongly preferred and the Southern Route (9E) is considered as only a marginal improvement over the Proposed Route. The County states that the Proposed Route would have significant detrimental effect on the County's landowners, farmers, economy, future development, and tax base.	For Owyhee County, the text is confusing to read because it inserts opinion regarding who "strongly prefers" and a 'determination' that the Southern Route is only a "marginal improvement" County or BLM. As it reads, it is an opinion which should not be included in the EIS.
	2.9.7.1	207	5	IDANG believes Segment 8 of the Proposed Route could adversely affect ground maneuver and aerial combat training operations within the Orchard Training Area. It could adversely affect approximately 3,500 acres of lands in the northern portion of the Orchard Training Area by limiting or restricting training near tower and line safety buffers. The Proposed Route could also negatively affect cultural sites and known populations of slickspot peppergrass (Lepidium papilliferum), a federally listed plant species.	IDANG believes proposed route Segment 8 would impact training operations. Then says it would impact slickspot peppergrass which is a listed species. Whose opinion is that? IDANG or BLM?
Cumulative Effects Summary	2.10				
	2.10	General		General	The EIS summary should discuss all alternatives in the cumulative discussion, not just the No Action and Proposed Action.
	2.10.1	208	all	i.e.: "...For many resources, the effects of Gateway West, when combined with the effects of other known projects, are not cumulatively substantial...." and "...The Gateway West Project would not have a measurable adverse effect on migratory bird populations or significant bird conservation sites..."	The EIS should describe the difference between "significant" vs. "substantial".

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.10.1	208	1 & 2	The effects of the proposed Gateway West Project, when taken together with past, present, and reasonably foreseeable future actions, constitute the cumulative effects of the Project and are fully analyzed in Chapter 4. Chapter 4 also discusses the cumulative effects of land use plan amendments needed to allow for the Proposed or Alternative Routes when the amendment would change one or more land classifications. For many resources, the effects of Gateway West, when combined with the effects of other known projects, are not cumulatively substantial. In other cases, although the effects of Gateway West are minor, when taken together with effects of other past, present, and proposed future actions, many of which collectively already present a substantial cumulative effect, the cumulative impact may be considerable. Finally, there are some effects of Gateway West that are by themselves large, and when considered with other effects, are also cumulatively substantial. Resources for which Gateway West effects are minor and even when considered together with other projects remain less than cumulatively substantial include socioeconomics, environmental justice, weeds, wetlands, federally listed invertebrate species, lynx, wolf, yellow-billed cuckoo, bald eagle, minerals, paleontological resources, geologic hazards, transportation, air quality, electrical environment, public safety, and noise. Additional details are found in Chapter 4.	The Elis needs to describe 'substantial' and 'minor.' In general, this section should just quantify impacts and not use value-based terminology. E.g.. Use the term 'measurably-adverse' vs. 'small adverse'.
	2.10.1	208	1	The effects of the proposed Gateway West Project, when taken together with past, present, and reasonably foreseeable future actions, constitute the cumulative effects of the Project and are fully analyzed in Chapter 4. Chapter 4 also discusses the cumulative effects of land use plan amendments needed to allow for the Proposed or Alternative Routes when the amendment would change one or more land classifications. For many resources, the effects of Gateway West, when combined with the effects of other known projects, are not cumulatively substantial. In other cases, although the effects of Gateway West are minor, when taken together with effects of other past, present, and proposed future actions, many of which collectively already present a substantial cumulative effect, the cumulative impact may be considerable. Finally, there are some effects of Gateway West that are by themselves large, and when considered with other effects, are also cumulatively substantial	The phrase "possibly allowing for other projects" is speculative. The EIS should deal with reasonable foreseeable future actions (proposed or planned not associated with this project).

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	2.10.2	209	1	Under the No Action Alternative, the BLM would not issue a ROW grant to the Proponents of the Gateway West Transmission Line Project and the Project would not be constructed across federal lands. No land management plans would be amended to allow for the construction of this Project. Other projects would continue, including wind farms, oil and gas extraction, and coal, trona, phosphate mines. The demand for electricity, especially for renewable energy, would continue to grow in the Proponents' service territories. If the Gateway West Project, or is not permitted, the demand for transmission services to which its purpose and need refers would not be met with this Project and the area would have to turn to other proposals to meet the transmission demand. According to McBride et al. (2008), the lack of construction of transmission lines could result in substantial adverse impacts on the economic growth, including loss of jobs, in the Pacific Northwest region, which includes Idaho as well as Washington, Oregon, Montana, and several Canadian provinces.	The Companies appreciate that the BLM recognizes the regional significance of the Gateway West Project as indicated in the DEIS' description of the No Action alternative which states "If the Gateway West Project, or is not permitted [sic], the demand for transmission services to which its purpose and need refers would not be met with this Project and the area would have to turn to other proposals to meet the transmission demand. According to McBride et al. (2008), the lack of construction of transmission lines could result in substantial adverse impacts on the economic growth, including loss of jobs, in the Pacific Northwest region, which includes Idaho as well as Washington, Oregon, Montana and several Canadian provinces." While that statement is accurate, the significance of the Project extends far beyond the Pacific Northwest. Without additional capacity available on the existing electrical grid, new generation including abundant wind development resources would be stranded and largely inaccessible. This scenario would therefore extend outside the Pacific Northwest to other regions, such as Wyoming, where new wind farms that provide economic growth and job opportunities would not be feasible without increased transmission capacity out of Wyoming.
Irreversible Commitments of Resources	2.11				
	2.11	210	2	Resources committed to the proposed Project would be material and nonmaterial. Irreversible commitment of resources for the purposes of this section has been interpreted to mean that those resources, once committed to the proposed Project, would continue to be committed throughout the 50-year life of the Project. Irretrievable commitment of resources has been interpreted to mean that those resources used, consumed, destroyed, or degraded during construction, operation, maintenance, and abandonment of the proposed Project could not be retrieved or replaced for the life of the Project or beyond.	The EIS reverses terms and should be corrected. "Irreversible" are impacts that can't be resolved and "irretrievable" is lost during life of project.
	2.11	211	T2.11.1	Removal or disturbance of habitat could create irreversible and irretrievable impacts. Aquatic habitat could be irreversibly affected Removal or disturbance of habitat could create irreversible and irretrievable impacts. Aquatic habitat could be irreversibly affected.	The EIS needs to explain why this is irreversible.
	2.11	211	T2.11.1	Removal or disturbance of vegetation could create irreversible and irretrievable impacts.	The EIS needs to explain why this is irreversible.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Chapter 3 - Environmental	3.1				
Introduction					
	3.1.2.1	2	1	The Proposed Action is to construct and operate approximately 1,103 miles of new 230-kV and 500-kV electric transmission system consisting of 10 segments between the Windstar Substation at Glenrock, Wyoming, to the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. Segments 1 to 3 and most of 4 would cross Wyoming while the western part of Segment 4 and Segments 5 through 10 would cross Idaho	The mileage figure in this paragraph should be changed to 1,100 miles.
	3.1.4	4	last	Chapter 2 and Appendix B describe the components of the Project contributing to construction ground disturbance and operations site occupancy and use that would be constructed for any Route Alternative chosen. These components include transmission support structures; their associated construction pads; pulling sites for tensioning conductors; access roads to each structure, regeneration station, and substation; staging areas; fly yards where helicopter construction would be used; regeneration sites; and substations. As part of the conceptual design and to aid quantification of effects, preliminary indicative locations were assigned for all components of the Proposed Action and each Action Alternative. At each location the change in existing conditions was measured based on the size requirements, existing vegetation, and land use. Figures 3.1-	The Draft EIS should include clear definitions and rationale for what it considers "temporary disturbance" and "permanent disturbance"
	3.1.4	6	Fig 3.1.2	(Refer to figure)	The Heward and Aoelus are new substations and should be included under "new" in permanent facilities.
	3.1.4	7	Fig 3.1.3	(Refer to figure)	The road width is 20 feet at corners.
Visual Resources	3.2				
	3.2.1.1	1	1	The Analysis Area for visual resources was established through a combination of field reconnaissance and in consideration of the BLM and Forest Service distance zones including foreground, middleground, background, and seldom seen (landscape areas screened by topographic features). These distance zones are described in more detail in the Key Observation Point (KOP) descriptions (Section 3.2.1.4). The visual resources Analysis Area generally is between 5 miles and 15 miles from either side of the centerline of the Proposed Route and Route Alternatives. Five miles was chosen as the minimum extent because it was assumed that beyond that viewing threshold, terrain and atmospheric conditions would absorb the transmission line. The background distance zone used by the BLM is defined as up to 15 miles. This distance was considered for certain sensitive viewing locations; however, due to the nature of lattice structures it was determined that, beyond the 5-mile distance zone (middleground to background), a lattice structure would not be visible in this landscape. In most instances, middleground and background distance zone views are broad open views of valleys and mountainous terrain that would absorb the visual alterations.	As stated in the Draft EIS, the transmission line can not be seen beyond 5 miles dues terrain and atmospheric conditions. Accordingly, we recommend that the visual impact analysis , area be confined to five miles from the centerline of the proposed transmission line.
	3.2.1.5	General		e.g. KOP C6 (Figure 3.2-2). Views from this point are from the Opal Wagon Road.	It is unclear why some KOP's use the letter "C" designation and some do not. The Draft EIS should be revised to clearly explain this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.2.1.5	34	last	Alternative 4A, the shortest of all the Segment 4 alternatives, would cross approximately 42.9 miles of BLM-administered land, including 13.5 miles managed with VRM Class II objectives in Wyoming and 10.5 managed with VRM Class III objectives in Wyoming and Idaho. Alternative 4A would also cross 4.5 miles of Wyoming state land and 34.3 miles of private land in Wyoming and Idaho. The following 10 KOP locations were selected to represent the most sensitive or most typical views for Alternative 4A. The first six KOPs exhibit both cultural and visual resource concerns and are described in the Section 3.3 – Cultural Resources.	We recommend revising the Draft EIS to indicate that Alternative 4A is proposed in a corridor containing 3 existing 345 KV lines. This is important relevant information for establishing the baseline for the comparison of project impacts.
	3.2.1.5	35	starts with 3	KOP C6 (Figure 3.2-2). Views from this point are from the Opal Wagon Road. KOP C110 (Figure 3.2-2). Views from this point are from the White Hill Historic Monument on the Oregon NHT. KOP C7 (Figure 3.2-2). Views from this point are from the Alfred Corum Grave on the Oregon NHT. KOP C8 (Figure 3.2-2). Views from this point are from the Nancy Hill Grave on the Oregon NHT. KOP C9 (Figure 3.2-2). Views from this point are from Emigrant Springs on the Oregon NHT.	Alternative 4A:KOP C6, C110, C7, C8, C9, C10: All of the previous subsequent KOPs descriptions disclose the type of viewer as well as the level of sensitivity impact. We recommend the Draft EIS be revised to disclose similar information for these KOPs.
	3.2.1.5	56	5	Alternative 7I would deviate from the Segment 7 Proposed Route east of Bradley Mountain and travel southeast along the Alternative 7B route, diverging from it north of Buist, Idaho. The alternative would travel west across the Sawtooth NF and Raft River Valley following the Alternative 7H route before diverging farther to the south, east of the Jim Sage Mountains. The Route Alternative would travel south of the City of Rocks National Reserve along the Nevada state line before turning northwest toward Amsterdam, Idaho, where it would follow an existing transmission alignment and WWE corridor to the Cedar Hill Substation from the west. Alternative Route 7I would cross approximately 0.6 mile of BLM-administered land with VRM Class II objectives (Burley FO) and 24.1 miles of BLM-administered land with VRM Class III objectives (Burley and Pocatello FO) as well as 65.3 miles of private land in the states of Idaho and Nevada.	The Alternative 7I route description references the WWE corridor. The Draft EIS should be revised so that all segments that will follow the WWE corridor include a similar disclosure.
	3.2.2.3	91	Table 3.2.2	2/ RES – A single resident. REC – A recreational viewer. HIST – A site identified as having historic value. CULT – A site identified as a sensitive viewing location for cultural resources yet not discussed in the Cultural Resources section.	Cultural footnote: why are there cultural sites that are not discussed in cultural section?
	3.2.2.3	95	2nd full	The construction and operations of a transmission line along Segment 1E would not be consistent with the Medicine Bow Forest Plan management objectives in all areas of the Forest crossed. Segment 1E would cross NFS lands designated as MA 3.31, Backcountry Recreation, Year-round Motorized. MA 3.31 has an SIO of Moderate. Impacts would be moderate due to screening offered by vegetation and landforms, distance of viewers, and lack of densely populated areas in this intact landscape. The area is not visible from any developed recreation area or travel way. Existing roads are closed to the public. Any new roads would also be closed. The borders of the cleared ROW would be feathered to create a more natural-appearing line, as required by the Forest Plan. Also, the towers would be made of material that, over time, becomes nonreflective. New towers would be similar to the existing towers to reduce contrast. A plan amendment would be needed (see Appendices F-2 and G-2).	The Draft EIS states that for Segment 1E: "New towers would be similar to existing towers to reduce contrast." This is not correct. Existing towers are wood, whereas proposed structures would be steel. Additionally, existing towers on 1Wc would be replaced. The Draft EIS needs to be revised to correct these errors.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.2.2.3	95	2nd full	The construction and operations of a transmission line along Segment 1E would not be consistent with the Medicine Bow Forest Plan management objectives in all areas of the Forest crossed. Segment 1E would cross NFS lands designated as MA 3.31, Backcountry Recreation, Year-round Motorized. MA 3.31 has an SIO of Moderate. Impacts would be moderate due to screening offered by vegetation and landforms, distance of viewers, and lack of densely populated areas in this intact landscape. The area is not visible from any developed recreation area or travel way. Existing roads are closed to the public. Any new roads would also be closed. The borders of the cleared ROW would be feathered to create a more natural-appearing line, as required by the Forest Plan. Also, the towers would be made of material that, over time, becomes nonreflective. New towers would be similar to the existing towers to reduce contrast. A plan amendment would be needed (see Appendices F-2 and G-2).	The Conformance with BLM VRM Classes and USFS VQOs section of the Draft EIS states: "Any new roads would be closed also." The Draft EIS needs to be revised to clarify that these roads would be gated or blocked to prohibit public use but would be deemed administrative use roads and, therefore, not reclaimed.
	3.2.2.3	97	Table 3.2.5-1st footnote	1/ Viewers at KOP would have views of Segment 1W(c) with lower anticipated visual impacts and Alternative 1E-C with higher impacts	The referenced statement from the Draft EIS does not make sense and should be revised accordingly.
	3.2.2.3	108		There are three Route Alternatives for a portion of the Proposed Route: Alternatives 2A, 2B, and 2C. alternative 2A shares many of the same KOPs that have been described above for Alternative 2B. The shared KOPs are all within close proximity to Fort Fred Steele. Alternative 2B is approximately 1.5 miles farther from Fort Fred Steele and closer to local residences than Alternative 2A. Overall, the Proposed Route would have less visual impact than Alternatives 2A or 2B due to the increased viewing distance between Fort Fred Steele and residences located to the north of I-80. With increased view distance the facilities lack scale and spatial dominance and in some views are partially to totally screened by the foothills of the Hogback, resulting in overall low visual impacts, with a few isolated incidences of moderate to high impacts resulting from the residence and recreational access area located south of I-80. If Alternatives 2A or 2B were selected, steel pole H-frame structures would be used where noted due to the adjacent H-frame structures in the area of impact. Alternative 2C shares KOP 836-West with Alternative 2A. At this location Alternative 2C would be closer and the visual impact would be moderate to high compared to the moderate impact from Alternative 2A. However, farther east Alternative 2A would be close to KOPs 838, C2, C3, and C4, as well as the community of Hanna. The overall visual impacts would be much greater from Alternative 2A compared to Alternative 2C.	For the Segment 2 Conclusion and Figure A-3 in the Draft EIS, we request that the BLM verify the accuracy of Alternative 2C on maps with respect to the Wyoming governor's designated corridor through sage grouse core areas.
	3.2.2.3	129	Table 3.2.23	(Refer to Table)	The Draft EIS needs to be revised to disclose why BIA reservation is listed as RES in some cases and Cult in others.
	3.2.2.3	156	5	If any of Alternatives 7H, 7I, or 7I were to be constructed, H-frame single circuit structures would be required in the Sawtooth NF.	Visual 19: 7I is listed twice.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.2.2.3	163	3	The three southern alternatives, 7H, 7I, and 7J, would connect the alignment reference point 7a2, from Alternative 7B, to the Cedar Hill Substation. These three alternatives would share a portion of their alignment south of the Sublette Range until crossing I-84. Alternative 7H would travel north of Elba, through the Albion District of the Sawtooth NF, and south of Oakley, Idaho, before rejoining the Proposed Route south of Artesian City. Alternatives 7I and 7J would continue on a shared alignment farther south of the Jim Sage Mountains as well as south of Almo and the City of Rocks National Reserve while following the Nevada state line before turning north around the western boundary of the Sawtooth NF. Where Alternative 7I would turn northwest, to continue a route through the Cassia Division of the Sawtooth NF, 7J would turn west through mostly private lands. Alternative 7I would continue northwest and then turn east back to the Cedar Hill Substation. Alternative 7J would continue northwest through private land for approximately 16 miles to a point where, if this alternative were selected, the Rogerson Substation (as an alternative to the Cedar Hill Substation) would be located. From this point, the alternative would split into two routes; one would head northeast to join with the Proposed Route Segment 7, while the other would head northeast to join with Proposed Route Segment 9. It is anticipated that Alternatives 7H, 7I, and 7J would be located in more pristine viewing conditions and closer to numerous sensitive viewing areas where contrast and impacts to viewers would be higher than comparison portions of the Proposed Route.	The Draft EIS needs to be revised to disclose that the "Rogerson substation (as an alternative to the Cedar Hill substation) ..." does not meet project purpose and need. There would still a need for a switching station at the Cedar Hill location, as this is a load location. Accordingly, this alternative should be dropped from detailed analysis or revised as previously noted
	3.2.2.3	190	1 & 2	Alternative 9A – Alternative 9A would cross 5.5 miles of BLM-administered VRM Class IV land designated by the Jarbidge RMP. Alternative 9A is anticipated to conform with VRM Class IV objectives (see KOP 440). Alternative 9B – Alternative 9B would cross over 1.6 miles of BLM-administered VRM Class I lands designated by the Jarbidge RMP between MPs 36.8 and 38.4 partially paralleling an existing 138-kV transmission line. It would not conform with the Jarbidge RMP because the objective of VRM Class I is to preserve the existing character of the landscape. Only natural ecological changes can occur on lands managed as VRM Class I and the level of change to the characteristic landscape must not attract attention (see KOPs 801 and 810). If this route were selected, amendments would be needed to change the VRM Class to VRM Class III where it would no longer conform with VRM Class II objectives. See Appendix F-1 for proposed amendment language and Appendix G-1 for visual analyses. Alternative 9B would also cross BLM-administered VRM Class IV lands designated by the Jarbidge RMP in numerous separate areas between MPs 0.0 and 53.2, paralleling an existing ROW, which allows for change in the landscape setting (see KOP 798). Impact areas along Alternative 9B are anticipated to conform to VRM Class IV objectives. Effects discussed in this chapter for KOP 810 would be dependent upon land use plan amendments to visual requirements.	The Draft EIS should be revised to delete the term "would cross over X.X miles" and replace it with "would cross X.X miles". The term cross over is confusing in that the reader does not know if "over" refers to above or on top of, or if it refers to cross more than X.X. miles. Additionally, the Draft EIS should be revised to use rounding to the nearest whole number when referring to "approximate" miles or acres. It is inappropriate to use the term "approximately" with numbers with decimal places out to the tens, hundreds, or thousandths.
Cultural Resources	3.3				

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3	1	1	For non-historic properties, BLM Manual 8100.03.F (BLM 2004a) states that "[c]cultural resources need not be determined eligible for the National Register of Historic Places (as in the National Historic Preservation Act) to receive consideration under the National Environmental Policy Act." Cultural resources that are of traditional religious and cultural importance, or TCPs, are places that "are valued by the human community" and play an important role in that community's "historically rooted beliefs, customs, and practices" (Parker and King 1992). Walker (2009) indicates that TCPs should be defined so as not to limit the identification of tribal "traditions, beliefs, practices, lifeways, arts, crafts, and social institutions." TCPs could also embrace a "rural community whose organization, buildings, and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents" (Parker and King 1992). This section also presents a suite of mitigation measures to be considered where impacts are unavoidable. As described in this document, mitigation under NEPA does not limit or prescribe the outcome of consultation required under Section 106 of the NHPA and implementing regulations found at 36 CFR Part 800.	While it is true that the BLM manual states that cultural resources need not be determined eligible, the section further states that the goal is to "preserve important historic, cultural, and natural aspects of our national heritage." What better measure of importance than meeting the National Register criteria? For the purposes of this project, we recommend that National Register eligibility be the yardstick for importance. This is especially important since there does not seem to be any effort to evaluate sites according to the BLM's cultural resource manual section 8130, and we cannot expend the resources necessary for protecting or mitigating sites that are not on, or eligible for, the National Register. Additionally, the Draft EIS introduces the acronym TCP without any definition. While it is true that the term TCP is introduced and discussed by Parker and King, the bulletin is advisory and the term has no regulatory definition or legal standing. IPC prefers that the legal term "properties of traditional religious and cultural importance" as defined in 36 CFR 8100, and requests that it be used in lieu of TCP throughout the document. The Draft EIS should be revised to address these inaccuracies.
	3.3.1.2	2	2	The protohistoric overviews provide a general description of the types of resources known in the region and reflect changes observed in cultural resource types and assemblages that occur between pre- and post-European contact. Historic resources are segregated into broad socioeconomic themes, such as transportation routes, including trails (further subdivided into trails that have been congressionally designated as NHT and other trails and routes), railroads, roads, and bridges; settlements including homesteads, ranches, and camps; irrigation works, including canals and ditches; and electric transmission lines. Other sites that are associated with trails, such as important emigrant graves, are treated with those trails.	This is the first time the acronym NHT is used in this section. The Draft EIS should be revised to spell it out and provide a definition the first time it is referenced.
	3.3.1.2	2	1	Prehistoric resources are divided into site categories that reflect the purpose and intensity of aboriginal occupation at specific locations: lithic (chipped stone) scatters, landscapes, and quarries; open and sheltered camps, with or without evidence of specialized activities; rock art (petroglyphs and pictographs); and mortuary sites that might include human burials. The protohistoric overviews provide a general description of the types of resources known in the region and reflect changes observed in cultural resource types and assemblages that occur between pre- and post-European contact. Historic resources are segregated into broad socioeconomic themes, such as transportation routes, including trails (further subdivided into trails that have been congressionally designated as NHT and other trails and routes), railroads, roads, and bridges; settlements including homesteads, ranches, and camps; irrigation works, including canals and ditches; and electric transmission lines. Other sites that are associated with trails, such as important emigrant graves, are treated with those trails.	The Draft EIS needs to be revised to disclose exactly what each state (Idaho & Wyoming) considers a "site".
	3.3.1.3	3	1	Adverse weather conditions precluded completion of the sample surveys for the Nevada portion of Alternative 7I/7J, survey of which is planned for the 2011 field season. At the request of the BLM Kemmerer FO, no sample surveys of Segment 4 alternatives were conducted. Instead, known site data were used in place of sample surveys to assess site likelihood along the alternatives (see Section 3.3.2.4).	This inventory was completed and that fact stated as such on page 3.3-241. Data from the inventory needs to be included in the final draft. Please adjust text accordingly, including the other sections of the document where discussion of the delay of the Nevada inventory occurs.
	3.3.1.3	3	Table 3.3-1	NHPA column, definition of Federal Undertaking	Only part of the definition was included. Please use the entire definition from 36 CFR 8100.16(y)

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3.1.3	3	Table 3.3-1	NHPA column, definition of APE	Please use the entire definition of APE from 36 CFR 8100.16(d)
	3.3.1.3	3	Table 3.3-1	NHPA column, definition of Effects	Only a partial definition of an adverse effect is presented.
	3.3.1.3	3	Table 3.3-1	NEPA column, definition of Adverse Impact	An opinion was rendered, not a definition of an adverse impact.
	3.3.1.3	3	Table 3.3-1	NHPA column, definition of Adverse Effect	Please use the entire definition of adverse effect from 36 CFR 800.5(a)(1)
	3.3.1.3	4	Table 3.3-1	NEPA column, definition of Eligible. "In the professional opinion of the EIS preparers, unevaluated resources may be eligible for inclusion in the NRHP."	This is an opinion. Sites are just as likely to be found ineligible. State instead that "unevaluated sites will be treated as eligible until a final determination has been made."
	3.3.1.3	4	Table 3.3-1	NHPA column, definition of Consultation	Please use the definition of consultation from 36 CFR 800.16(f)
	3.3.1.3	4	Table 3.3-1	NHPA column, ACHP	The role of the State Historic Preservation Office was omitted. They are the first line of review on how agencies' decisions affect historic properties.
	3.3.2.1	4	2	Literature Review: The Analysis Area includes those cadastral sections crossed by a 1-mile buffer on Proposed Route and Route Alternatives for a file search in each state, and the ecoregions crossed by the Project for published and unpublished literature on the area.	Insert ". . . from the centerline of . . ." between buffer and on.
	3.3.2.3	15	2	1. The BLM's VRM system, which uses a specific inventory system to determine visual impact and to determine whether that impact is consistent with visual land management objectives assigned in the area's RMP;	This is the first time that the acronyms VRM and RMP are introduced in this chapter. The Draft EIS needs to be revised to spell out and define those acronyms the first time they are referenced.
	3.3.2.4	18	2	The viewshed analysis used GIS to evaluate whether transmission line towers might be visible by viewers along historic trails and generated two types of viewsheds: a multiple viewshed and an individual viewshed. A multiple viewshed analysis combines the viewable areas from several observation points into a single visibility surface. The fieldwork analysis used transmission towers, spaced at 300 feet or 100 meters, as viewpoints. This method created a visibility surface 5 miles on either side of the transmission line where the towers would most likely be visible. Historic trails/routes were overlaid in GIS on the visibility surface to identify any intersecting trail sections or portions of the trail that needed to be visited in the field. In contrast to multiple viewshed analysis, individual viewshed analysis results in a visibility surface that relates to a single observation point. Several KOPs along historic trails were established in the field and an individual viewshed was created for each KOP. The individual viewsheds identified the Project segments and alternatives that were visible from each KOP. Both viewshed analysis methods assume an average observer eye level of 5.5 feet. Tower height was assumed to be 190 feet for the field viewshed analysis and 180 feet for the KOP analysis. In addition to identifying each visible Project segment and alternative, the shortest distance from a KOP to the Project segment and alternative was calculated in GIS using a straight line, or perpendicular, distance. If a Project segment or alternative did not intersect the viewshed at the shortest distance, then the distance was calculated at an angle from the KOP to the nearest point of Project/viewshed intersection.	The Draft EIS needs to be revised to clearly disclose the rationale for the height assumptions given in this paragraph.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3.2.4	19	1	Assessment of impacts on cultural resources within the Project's viewshed assumed a worst-case scenario, in which all viewers would have views toward the proposed Project on a high-visibility day (recommended to be up to 5 miles and beyond) and the KOP chosen for that resource would best represent the disparate viewing conditions and viewing opportunities. In September 2009, Idaho and Wyoming BLM authorized use of the following procedure for visual analysis of cultural resources within the Project area	The Draft EIS needs to be revised to delete the phrase "and beyond" and just provide a specific number of miles.
	3.3.2.5	20	1	The 1,103-mile-long Gateway West Transmission Line can be considered an environmental transect, inasmuch as it crosses several environmental zones from its beginning in east-central Wyoming to its terminus in southwestern Idaho, with one alternative crossing through a portion of northern Nevada. For discussion purposes, it is useful to distinguish the project environmental setting by ecoregion. Ecoregions are defined as "areas of general similarity in ecosystems and in the type, quality, and quantity of environmental resources" (USEPA 2007). This is relevant to an understanding of human settlement and subsistence in the Project area, because each ecoregion is characterized to by a distinctive landscape that, to a greater or lesser extent, influenced human settlement and by a complement of essential resources (e.g., potable water, plants, animals, and useful raw materials) upon which the prehistoric and historic inhabitants relied for subsistence. Therefore, modern environmental parameters are used to interpret past patterns of human settlement and subsistence. The regional climate has fluctuated dramatically in the 12,000-plus years that humans have occupied these areas of Idaho and Wyoming. A general description of these ecoregions serves as a natural baseline against which the representative cultural resources are compared, with the ultimate purpose of deciding which Project segments (proposed or alternative) are least likely to impact significant cultural resources.	The Draft EIS should be revised to delete "can be considered an environmental transect, inasmuch as it" so the sentence reads "..Transmission Line crosses several environmental zones..."
	3.3.2.5	25	1	Segment 10 crosses the Snake River Plain. It has no prehistoric resources, indicating that its natural resources were sparse. It did, however, support several historic settlements, emigrant trails and railroads, and irrigation waterworks, reflecting again the historic growth of settlement in the area. Irrigated farmland is present along the Snake River and near reservoirs	Is it Segment 10, or the Snake River Plain, that has no prehistoric resources? The Draft EIS needs to be revised to clarify this.
	3.3.2.5	25	4	The Shoshone, Paiute, and Bannock occupied portions of southern Idaho, western Wyoming, and northern Utah. As mentioned above, an ethnographic study requested by the Shoshone-Paiute and Shoshone-Bannock Tribes is currently underway. In addition to his own reassessment of the Shoshone-Bannock, Walker (1993) cites Lowie (1924), Stewart (1939), and Fowler and Liljeblad (1986) as the principal ethnographic sources for the Northern Paiute (Walker 2009). Traditional ethnographies of the Northern Shoshone and Bannock Tribes are Lowie (1909), Steward (1938), Murphy and Murphy (1960, 1986), and Walker (1973, 1978, 1993).	The Draft EIS needs to be revised to disclose that the ethnographic study requested by the Shoshone-Paiute has been completed.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3.2.5	27	4	Previously Recorded Cultural Resources The inventories resulted in the identification of over 200 cultural resources located within the Analysis Area (extending 0.5 mile south from the Idaho-Nevada border). Identified sites are all prehistoric in origin and consist of lithic scatters and quarrying areas, many with stone tools, related to locally occurring obsidian and ignimbrite sources.	The earlier discussion on page 3.3-27 states that over 200 sites associated with obsidian quarrying were identified, but the last paragraph on page 3.3-34 states that only seven sites were identified. The Draft EIS needs to be revised to address these inconsistencies.
	3.3.2.5	29	Tab 3.3.-3	(Refer to Table)	The Draft EIS needs to be revised to disclose which of the sites in this table are considered eligible sites and which are considered in-eligible.
	3.3.2.5	40	2	Power Transmission sites are locations, features, or structures involved with the movement of energy from one place to another. Until recently, transmission lines have not been widely recorded as historic sites. The historic context statement written for the Bonneville Power Administration (BPA) (Kramer 2009), and a report prepared for the Western Area Power Administration that was submitted to the Colorado and Wyoming SHPOs (Schweigert 1998), will be used to help guide resource evaluation during the Phase II survey. Both documents contain a detailed historic context on the design and construction of electrical transmission systems in the western U.S	This paragraph is inconsistent with the Wyoming SHPO/BLM protocol Appendix D, which categorically excludes most power lines, from consideration as historic sites. Nevada has a context for transmission lines prepared by Erika Johnson in 2006, the Draft EIS needs to be revised to reference and consider this information.
	3.3.2.5	40	last bullet	Rural sites include buildings, structures, objects, sites, or districts associated with human settlement in the non-urban setting.	The Draft EIS should be revised to provide clear examples of what might fall into this category, and how they might not fit into other categories of sites in a rural setting.
	3.3.2.5	65	5	The cultural files search identified several canal sites within the Idaho Project area. These include water conveyances known as the Twin Falls Main Canal, Milner Gooding Canal, A Coulee Canal, High Line Canal, X Canal, Portneuf Marsh Valley Canal, and Bear Lake Outlet Canal. The Proposed Route in Segments 8, 9, and 10 would cross several other unnamed or unidentified canals.	The Draft EIS needs to be revised to provide a description of the Y-Canal, which parallels the X-Canal and has been determined eligible for listing on the NRHP.
	3.3.2.5	68	2	Pedestrian cultural resources inventories (a 15 percent sample) were attempted for the Nevada portion of Alternative 7I/7J but the attempt was abandoned due to snow. Surveys are planned for the 2011 field season (prior to completion of the Final EIS). One site was documented along the Nevada portion of Alternative 7I/7J.	This section indicates that the Nevada sample survey was not yet complete, but page 3.3-241 indicates that the survey was completed in July 2011.The Draft EIS needs to be revised to correct or clarify this inconsistency.
	3.3.3.2	70	CUL-3	CUL-3 The Cultural Resource and Paleontological Monitoring and Mitigation Plan will include provisions for the preparation for the preparation and curation of any fossil collections from federal lands and for the preparation of a final report based on the data recovered for activities on federal lands	This stipulation is for paleontological resources. We recommend that the Draft EIS be revised to move it to the paleontological section of the EIS.
	3.3.3.2	70	CUL-8	CUL-8 If human remains are discovered, construction will be halted and the county coroner will be notified. If human remains of Native American origin are discovered, or if associated grave goods or objects of cultural patrimony are discovered on lands managed by a federal agency, the provisions of NAGPRA will be followed.	The Draft EIS should be revised to indicate that there is a completed programmatic agreement (PA) to address this issue. The Draft EIS should also be revised to reference appropriate mitigation measures described in the PA.
	3.3.3.2	72	6th bullet	CR-3, 6th bullet - Acquire or trade land with willing seller(s).	The Draft EIS needs to be revised to indicate the purpose of any land tenurement adjustments and what values that land will be managed for.
	3.3.3.2	72	7th bullet	CR-3, 7th bullet - Preserve landscapes from a cultural landscape perspective.	How is this to be done? There is already discussion on preserving

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3.3.2	72	8th bullet	CR-3, 8th bullet - Bury elsewhere other (non-Project) lower kilovolt transmission or distribution lines.	This is a very expensive proposal which will make future maintenance of the line(s) extremely difficult and expensive. As a consequence, transmission reliability would suffer. As the Proponent, we would prefer The Draft EIS be revised to remove this stipulation, as it does not allow the project to meet purpose and need .
	3.3.3.2	72	10th bullet	CR-3, 10th bullet - Re-vegetate disturbed areas to protect or restore viewsheds.	Re-vegetation is covered under other sections of this document. Is it really necessary here?
	3.3.3.2	73	CR-5	On NFS lands, a management plan should be developed for each historic property nominated to the NRHP. The plan should be drafted during the nomination process. The National Heritage Strategy should be used to guide decisions on issues related to the Heritage Program	The PA, which was developed with Forest Service participation, does not include a stipulation for management plans for each historic property. The Draft EIS needs to be revised to remove this stipulation, thereby ensuring consistency with this PA. Additionally, the Draft EIS should be revised to clearly disclose that the project proponent's are required to address impacts to cultural resources within the APE, not within all NFS lands.
	3.3.3.3	88,94,109,116,117,122,129,132,134,136,137,138,139,141,146,154,155,200,220,232,234,325	Various	3.3.3.3 Visual Impacts of the Proposed Route and Alternatives by Segment: KOP C43; KOP C45; KOP C51; KOP C15; KOP C12; KOP C27; KOP C110; KOP C42; KOP C7; KOP C8; KOP C11; KOP C28; KOP C29; KOP C30; KOP C121; KOP C10; KOP C41; KOP C61; KOP C60; KOP C116; KOP C120; KOP C104	This section appears to be inappropriately applied, especially in that it is linked to the Wyoming BLM/SHPO Protocol. Section 3.3.2.4 indicates that proposed project elements need "tend to dominate the setting" to create the moderate or strong contrast constituting an adverse effect. However, the Draft EIS states that the elements would not dominate the setting, yet concludes, contrary to the previous rationale, that there is an adverse effect. The Draft EIS needs to be revised to address this inconsistency. Additionally, the Draft EIS needs to be revised to better explain if and how the setting is truly a significant historic feature of the site or trail segment.
	3.3.3.3	126,127,164,168,169,170;177,178,182,183,184,186,187,188,189,191;209,238	Various	3.3.3.3 Visual Impacts of the Proposed Route and Alternatives by Segment: KOP C38; KOP C39; KOP C24; KOP C22; KOP C23; KOP C65; KOP C23; KOP C66; KOP C67; KOP C78; KOP C73, KOP C74; KOP C75; KOP C76; KOP C77; KOP C83; KOP C84; KOP C85; KOP C108; KOP C99	This section appears to be inappropriately applied, especially in that it is linked to the Wyoming BLM/SHPO Protocol. Section 3.3.2.4 indicates that proposed project elements need "tend to dominate the setting" to create the moderate or strong contrast constituting an adverse effect. However, the Draft EIS states that the elements would not dominate the setting, yet concludes, contrary to the previous rationale, that there is an adverse effect. The Draft EIS needs to be revised to address this inconsistency. Additionally, the Draft EIS needs to be revised to better explain if and how the setting is truly a significant historic feature of the site or trail segment.
	3.3.3.3	144 - 145	KOP 57	KOP C57 (Figure 3.3-71) is located on a segment of the California NHT – Dempsey-Hockaday Cutoff, 0.5 mile south of Sullivan Hollow. Fontenelle Creek is 2 miles to the north and Willow Creek is 0.75 mile to the south. The Proposed Route in Segment 4 of the Project is 1.4 miles to the north. The KOP is situated on a broad east-to-west trending ridge on a two-track road that bisects the trail. Photographic simulations depicting indirect (visual) impacts to the resource have been generated for this KOP (Appendix E, Figures E.3-23 and E.3-24).	The analysis states that the project elements would ". . . blend in with the landscape, decreasing their prominence within the view. . ." If that is the case, it seems odd that the Draft EIS concludes they would dominate the setting. The Draft EIS needs to be revised to clarify the rationale between these two conclusions.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3.3.2	172	KOP 70	KOP C70 (Figure 3.3-107) is located on a segment of the California NHT – Hudspeth Cutoff, in the canyon for South Fork Sublette Creek, between Eyrie Canyon to the north and Park Canyon to the south. KOP C70 is located approximately 0.8 mile south of Alternatives 7H and 7I/7J. The resource at this location is a bladed road. There are no modern intrusions to the setting at this location. Views of the Project route near this KOP are intermittent and screened in most areas by topography. Due to the KOP's proximity to the Route Alternatives, the VCR for this KOP is assessed as strong for Alternatives 7H and 7I/7J. The proposed Project elements would dominate the setting; therefore, there would be an adverse impact to the resource at this location	How can the Proposed project elements dominate the setting when the views of the Project route near the KOP are intermittent and screened in most areas by topography? The Draft EIS needs to be revised to clarify the rationale for this conclusion.
	3.3.3.2	239	KOP C99	KOP C99, Figure 3.3-191. "View northwest toward the Proposed Route in Segment 10 from Minidoka National Historic Site."	The Minidoka National Historic Site (MNHS) is on the north side of the North Side Main Canal. Is that the canal visible in the photo, and if so, is the direction indicated correct? The view to the northwest includes a number of modern structures, developed agricultural fields, and relocated MNHS structures. In the KOP description, it states that the MNHS is northeast of the proposed route. Shouldn't the photo have been directed to the southwest? The analysis states that the project has similarity of design and the potential to blend in with the backdrop. If so, why is this considered an adverse effect? What is the property's significant historic feature, and is it impacted by a change in the setting? If it is the harsh desert environment when the camp was first built, hasn't that already been diminished by the number of modern farms that surround the MNHS, and the number of transmission lines in the vicinity leading to the substation to the south? The Draft EIS needs to be revised to address these questions and how this affects the conclusion that the project would have an adverse affect.
	3.3.3.4	240	3	Historic Value – defined as an ordinal scale with values ranging from 1 to 4, possibly encompassing two or more criteria of NRHP eligibility. Sites that have standing structures and archaeological potential were assigned a value of 4. Intact historic trail ruts might have been placed in this category but direct impacts to such resources are less likely because the trail segments would be spanned by the transmission line. Indirect (visual) impacts to historic trails are much more likely but those impacts are captured by the Overall Visual Impacts variable (see below). Sites with standing structures but without archaeological potential were assigned a value of 3. Sites that have archaeological potential but no standing structures are slightly less valuable than those with standing structures and were accorded a value of 2. Finally, historic debris scatters have limited importance and were given a value of 1. For each route, these values were summed and divided by the number of resources to achieve a "score" that reflects the Historic Value of resources within that route. More historic resources and higher measures of Historic Value per segment equate to greater impacts	The Draft EIS needs to be revised to insert "unassociated" in front of "historic debris scatters."

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3.3.4	240	3	Historic Value – defined as an ordinal scale with values ranging from 1 to 4, possibly encompassing two or more criteria of NRHP eligibility. Sites that have standing structures and archaeological potential were assigned a value of 4. Intact historic trail ruts might have been placed in this category but direct impacts to such resources are less likely because the trail segments would be spanned by the transmission line. Indirect (visual) impacts to historic trails are much more likely but those impacts are captured by the Overall Visual Impacts variable (see below). Sites with standing structures but without archaeological potential were assigned a value of 3. Sites that have archaeological potential but no standing structures are slightly less valuable than those with standing structures and were accorded a value of 2. Finally, historic debris scatters have limited importance and were given a value of 1. For each route, these values were summed and divided by the number of resources to achieve a "score" that reflects the Historic Value of resources within that route. More historic resources and higher measures of Historic Value per segment equate to greater impacts	Literature Review: Historic Value: Terms: "slightly less value", "limited importance" were used to determine "score" but these terms are very vague and could mean different things to different readers. The Draft EIS needs to be revised to provide a better description or criteria for these terms.
	3.3.3.4	241	1	Preliminary results of a 15 percent survey along 7I and 7J in Nevada, conducted July 2011, were used in evaluating these alternatives. Full survey results will be reported in the Final EIS. Overall, the 15 percent survey results are statistically less reliable for comparing routes, given the manner in which the sample was drawn (i.e., confined to Tribal and public lands , from previously unsurveyed areas, on shallower slopes, and in undisturbed areas), but they have modest interpretive value and provide valuable insights into the distribution of cultural resources in each segment. Because the magnitude of the 15 percent survey is probably influenced by the size of the investigated areas and thereby inflates the assessment of impacts, the raw frequency in each segment has been "normalized" by dividing that number by the segment's total length.	15% Survey Results: "Full survey results will be reported in the FIS.": The Draft EIS needs to revise this sentence so readers understand that full survey results means full 15% survey results.
	3.3.3.4	248	Fig 3.3-192	(Refer to figure)	This figure has numerous inaccuracies, including incorrect labeling and the reversal of proposed and alternative routes. The Draft EIS needs to be revised to correct these inaccuracies.
	3.3.3.4	262	Fig,. 3.3-206	(Refer to Figure)	Page 3-262 and page 3.3-263 are duplicates but with different results. Which is correct? The Draft EIS needs to be revised to address this inconsistency.
	3.3.3.5	264	Overall	All	Based on inaccuracies in route labeling in Section 3.3.3.4, how do we know that this section is addressing the maps as shown in Figure A-2?
	3.3.3.5	265	3	Table 3.3-9 summarizes historic trail crossings in Segment 1W. As summarized in this table, impacts to significant trail segments would be greatest for the Proposed Route 1W(a), and less so with Alternative 1W-A and Proposed Route 1W©	Segment 1W Heading: States Alternative 1W-A would have fewer impacts than Proposed Route 1W but Table 3.3-7 (pg 243) states otherwise. The Draft EIS needs to be revised to address this inconsistency.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.3.3.5	270	1 & 2	The Proposed Route in Segment 5 is 54.6 miles long and has a low number of prehistoric (n=21) and historic (n=8) sites, for a ratio of approximately 0.5 site/mile. Previous surveys in this area have been limited, which may partially account for the low site density. Intensive agricultural activity in this area may also have destroyed many sites. Relative to the five Route Alternatives, the impacts of the Proposed Route are considered to be low. The comparison portions of the Proposed Route would have fewer impacts than alternative routes 5A, 5B, 5C, and 5D, but Alternative 5E would have more impacts than the comparison portion of the Proposed Route. Table 3.3-14 summarizes historic trail crossings in Segment 5. Impacts to significant trail segments would be greatest for the Proposed Route, followed by Alternatives 5D and 5E and then by Alternatives 5A and 5B. No historic trails would cross Alternative 5C	Segment 5: Impact comparison for 5B and 5E are inconsistent with Table 3.3.-7 (pg 243). The Draft EIS needs to be revised to address this inconsistency.
Socioeconomics	3.4				
	3.4.1.4	15-16	Tab 3.4-11	(Refer to Table)	The Draft EIS needs to be revised to update the information regarding the data referenced in this table. For example, the description of the 2009 data should be changed from "estimated" to "actual data. Additionally, all data estimates in this section be updated or replaced with actual data as appropriate.
	3.4.1.4	19	Tab 3.4-12	(Refer to Table)	If data is available, the Draft EIS should be revised to replace the 2005/2006 stats with something more recent.
	3.4.2.1	28	2 & 3	Under the No Action Alternative, the Proposed Action would not be constructed, operated, or decommissioned. There would be no Project-related impacts to socioeconomics. As discussed in Chapter 1 of this EIS, the Gateway West Project is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 3,000 MW of additional energy for the Proponents' larger service areas, primarily in Utah and Idaho. The purpose and need of the proposed Project would not be met under the No Action Alternative and existing constraints coupled with projected increases in demand in the Proponents' service areas could result in insufficient supply to meet energy demand and an increase in the potential for supply outages. These potential impacts could have detrimental socioeconomic impacts, with negative impacts to existing businesses and economic activities, as well as businesses and economic activities that might otherwise consider locating in the affected service areas.	The Draft EIS needs to revise this section as necessary to ensure it is consistent with Chapter 1 of the EIS.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.4.2.2, 3.4.2.6	28, 74	4th full, 3rd	Estimated construction workforce requirements are summarized by EPC contract in Figures 3.4-1 through 3.4-4. These projections were developed for the various Project components by the Proponents' transmission engineering contractor using project planning computer software. Overall, Project construction is expected to occur between June 2013 and December 2018, depending on permitting. The Proponents' proposed schedule identifies general construction time frames by segment and substation, generally 4 to 5 years (see Table 2.1-3). Construction times by segment are, however, expected to range from about 8 months to 27 months; similarly, substation construction times would range from 2 to 9 months. This construction would take place within the broader time frames identified in Table 2.1-3 but the exact timing is unknown. In addition, the start of construction could be delayed based on permitting. This could affect the years identified in the following section, but would not be expected to substantially change the estimated impacts.	Population: Verify substation construction durations. Maximum of 9 months seems short. Referenced in both places.
	3.4.2.2	34	Fig 3.4-5	(Refer to figure)	The Draft EIS needs to be revised so this figure discloses that substation EPCs and transmission line EPCs would be separate.
	3.4.2.2	42	2	Adjusted to 2009 dollars, the HydroSolutions and Fehringer estimates for irrigated fields ranged from $16 per structure for a single pole located along the edge of a field to $300 per structure for an H-frame structure located in the interior of the field. The Power County Task Force's (2009e) estimated that duplication of processes (seeding, fertilization, chemical/pesticide application, cultivation, and harvest) on irrigated cropland would result in annual costs of $2,740 per mile, assuming four transmission structures per mile, or $685 per structure.	Power County estimates losses due to loss of development within 60 feet of the easement. Companies do not preclude development outside of the easement and compensation cannot be based on future speculative land use, only on current use and zoning.
	3.4.2.3	71	1	The City of Rockland in Power County, Idaho, has expressed concern that construction of Segment 7 of the proposed Project would hinder potential future growth of the city because this segment of the proposed transmission line would pass approximately 0.5 mile south of the city and cross an area where the City believes future growth would be likely to occur. Rockland, which had a total estimated population of 312 in 2009, estimates that this would result in foregone revenue from federal highway dollars paid per capita, and from local liquor taxes and property taxes (Power County Task Force 2009c, 2009f). These estimates are based on the assumption that 25 households that would otherwise move to Rockland over the next 40 years would, as a result of the proposed transmission line, move elsewhere. The City of Rockland has also indicated that Alternative 5D, which passes almost 3 miles east of the city at its closest point, would have similar impacts, but provided no supporting discussion (Power County Task Force 2010).	City of Rockland and Power County have made assumptions that the powerline will impact future growth but provide no supporting information. This discussion appears biased towards Power County.
Environmental Justice	3.5				
	3.5.1.5	5	Tab 3.5-2	(Refer to Table)	This Table Header says "Percent of Total Population 2000": The rest of the table says the data is from 2010. The Draft EIS needs to be revised to clarify this or correct the inconsistency.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.5.1.5	2	2	The CEQ and USEPA guidelines indicate that low income populations should be identified based on the annual statistical poverty thresholds established by the U.S. Census Bureau. Like minority populations, low income communities may consist of individuals living in geographic proximity to one another, or a geographically dispersed set of individuals who would be similarly affected by the proposed action or program. The U.S. Census Bureau defines a poverty area as a census tract or other area where at least 20 percent of residents are below the poverty level (U.S. Census Bureau 2008b).	"below the poverty level in Idaho in 2008 was very..." This is referring to Table 3.5-3 which presents 2009 data. Need to correct 2008 to 2009.
	3.5.2.2	9	2	Operation of the proposed Project is not expected to have high and adverse human health or environmental effects on nearby communities. Long-term visual impacts would result from the long-term presence of the transmission line structures and overhead conductors. Other long-term visual impacts could include land scarring from grading and other construction activities in semi-arid environments where vegetation recruitment and growth are slow. Vegetation would also remain cleared or partially cleared along some portions of the ROW for the operational life of the Project (see Section 3.2 – Visual Resources).	"vegetation would also remain cleared or partially cleared along some portions..." The use of the term "cleared" gives the impression that the areas are denuded of vegetation. Tall growing vegetation may be cleared as needed but low growing vegetation is preferred and reclamation activities will take place. Change to "tall growing vegetation..."
Vegetation Communities	3.6				
	3.6.1.4	5	1st bullet	Digital ortho quarter quad tiles of the Project were downloaded from the USDA Farm Service Agency's National Agriculture Imagery Program (NAIP). This program acquires 1-meter resolution digital ortho imagery for agricultural regions in the United States during the summer crop growing season. The program updates their datasets annually by rotating among states or over regions within larger states; therefore, only a portion of the United States is flown each year. NAIP imagery is acquired at a 1-meter ground sample distance with a horizontal accuracy that matches within 6 meters of reference aerial control points, which are used during image inspection. Latest imagery available for Idaho had been flown in 2004 and for Wyoming and Nevada in 2006. This imagery was used for the purposes of initial segmentation.	This paragraph is unclear regarding the vegetation management requirements for construction vs. operations. Add more clarity to the description as to why the area is greater during operations than during construction.
	3.6.1.4	5	1st bullet	Analysis of ROW clearing and maintenance impact was assessed by GIS by overlaying the vegetation with the ROW width.	Please clarify if this analysis considered the Company-proposed EPMs when evaluating potential impacts. In other words, did the DEIS use only GIS data and not take into account how impacts to vegetation would be avoided and/or minimized by EPMs?
	3.6.1.4	5	2	The values reported for operations impacts due to ROW maintenance/clearing may be larger than those reported for construction ROW clearing in some instances (e.g., see Tables D.6-2 and D.6-3). This is because the disturbance footprint necessary to construct tower pads and access roads is larger during construction, compared to the permanent footprint of these same tower pads and access roads during operations. In addition, some disturbances (e.g., fly-yards) would only occur during construction, and these same areas may be later classified as ROW maintenance disturbances during operations if they occurred within the forested ROW. As a result, the areas classified as "ROW disturbances" compared to the areas classified as "project facility disturbances" can be smaller during construction than during operations. For example, as shown in Figure 3.6-1, the total area disturbed during construction and operations is identical within this hypothetical forested area; however, the area that would be classified as ROW maintenance/clearing is smaller during construction than during operations	These two sentences seem to contradict each other. If the disturbance footprint is larger during construction, how can the operations impacts be greater?

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.6.1.4	5	Figure 3.6-1	(Refer to figure)	We recommend the Draft EIS be revised to include labels and/or a legend of key project features on this figure. Additionally, it is not clear why the figure shows operation impacts occurring only on two sides of the structure and not on all four sides since maintenance activities would typically require access to all sides of the structure although the majority of work may occur on one side. The narrow strip that is marked "maintained clear for line maintenance" is not correct. Low growing vegetation will occur within and adjacent to the structures and would be removed on a periodic basis. Moreover, the Companies are not intending to maintain a cleared area to the edge of the ROW. The Draft EIS needs to be revised to correct these errors.
	3.6.2.2	14	1	After construction, the portions of the structure pad not needed for normal transmission line maintenance, including fire and personnel safety clearance zones, would be restored to approximate their pre-construction conditions and would be reseeded with a weed-free seed mix. The recovery of vegetation following reclamation would vary by plant community type desired following construction (i.e., low-growing vegetation maintained in the ROW for safety). Grasslands and herbaceous wetlands would generally recover within 5 to 7 years. Shrublands may require 30 to 50 years, and forested and woodland areas could take 50 to 100 years to reach mature conditions. Sites with naturally sparse vegetation, saline or alkaline soils, high erosion potential, or shallow soils may be difficult to restore and may require special techniques or repeated revegetation efforts. The vegetative communities that reestablish after construction may differ from pre-construction conditions if soils are modified during construction due to compaction or by breaking up of hardpans.	"After construction, the portions of the structure pad not needed for normal transmission line maintenance…would be restored…and would be reseeded…" This gives the false impression that the portion of the pad used during maintenance would remain bare ground which is untrue. It will be reclaimed and reseeded as well. The Draft EIS needs to be revised to correct this error.
	3.6.2.2	15	last	Given the dry climate, that construction would occur during the summer when the weather is hot and dry, and the vegetation present in the vicinity of the ROW, the potential for fire is relatively high. To minimize the potential for wildfires, state and federal fire prevention requirements would be followed. Fire prevention measures would include enforcing red flag warnings, providing "fire behavior" training to all pertinent personnel, keeping vehicles on or within designated roads or work areas, and providing fire suppression equipment and emergency notification numbers. All construction personnel would also be trained in wildfire risk and prevention and adequate fire suppression equipment would be maintained with each construction crew. Fire prevention measures have been developed (refer to Table 2.7-1), which outline the responsibilities of Project personnel for prevention and suppression of fires and define minimum fire prevention and suppression measures that would be used during Project…	The DEIS fails to identify what is meant by adequate. We recommend this text in the Draft EIS should be revised as follows: "All construction personnel would also be trained in wildfire risk and prevention and fire suppression equipment consisting of shovels, rakes, and/or Pulaski's, a 16-20 lb fire extinguisher, and 20-50 gallons of water with a way to effectively spray the water (i.e. backpack pumps, water sprayer, etc.) would be maintained with each construction crew. When performing O&M or emergency repair activities during the "closed" fire season in Idaho (May 10 – October 20 each year as set by Idaho State Law, Title 38-115), crews will have the fire suppression equipment as specified in Appendix C-4, p. 16."
	3.6.2.2	17	Fig 3.6-2	(Refer to figure)	We recommend that the Wire zone/border zone illustration be revised to insert the correct 500kV str. type with delta conductor configuration.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.6.2.2	19	VEG-14	VEG-14 Where the route would be visible on timbered slopes on lands managed by the Kemmerer FO, allow tree removal only at structure locations and where required for safety rather than from the entire ROW in order to prevent a linear feature on the landscape from clear-cutting trees. Vegetation removal requirements will consider Appendix A, Key Standards Relating to Electric System Reliability and Safety, of the MOU with the Edison Electric Institute (2006).	This is not feasible as a mitigation measure and is a direct contradiction to the intent of the MOU cited. The MOU's intent is to perform cover type conversion away from vegetation communities that could interfere with the conductors at some time in their life-cycle toward plant communities that will not. A requirement that we not remove trees except at structure locations will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. The Draft EIS needs to be revised to remove this mitigation measure. We recommend it be replaced with a mitigation that requires us to feather the right of way, as outlined in the last paragraph of page 21 for the Medicine Bow-Routt and Caribou-Targhee NFs.
	3.6.2.2	52	VEG-14	VEG-14 Where the route would be visible on timbered slopes on lands managed by the Kemmerer FO, allow tree removal only at structure locations and where required for safety rather than from the entire ROW in order to prevent a linear feature on the landscape from clear-cutting trees. Vegetation removal requirements will consider Appendix A, Key Standards Relating to Electric System Reliability and Safety, of the MOU with the Edison Electric Institute (2006).	This is not feasible as a mitigation measure and is a direct contradiction to the intent of the MOU cited. The MOU's intent is to perform cover type conversion away from vegetation communities that could interfere with the conductors at some time in their life-cycle toward plant communities that will not. A requirement that we not remove trees except at structure locations will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. The Draft EIS needs to be revised to remove this mitigation measure. We recommend it be replaced with a mitigation that requires us to feather the right of way, as outlined in the last paragraph of page 21 for the Medicine Bow-Routt and Caribou-Targhee NFs.
Special Status Plants	3.7				
	3.7.1.1	1	2	The Analysis Area for the TES plant species and their habitat was set as a 1-mile-wide area centered on the Proposed Route and its Alternatives (a half mile on either side of the centerline of each route), and a 0.5-mile-wide area centered on any access roads that extended outside of the 1-mile-wide route buffer (0.25 mile on either side of the access road's centerline). The Analysis Area, as designed, encompasses all Project components including the entire Project ROW, all access roads and ancillary facilities, as well as all staging areas and fly yards. While most of the Analysis Area would not be impacted by the proposed Project, information gathered for this larger area allows for an understanding of the context in which the impacts would occur and permits an assessment of indirect effects. Potential direct impacts to plants species that are living in the immediate vicinity of construction are limited to the actual footprint of disturbance during construction. Chapter 2 and Appendix B of this EIS provide additional details regarding the disturbance footprint that would occur during construction. However, indirect impacts to habitat and to species occupying them would extend beyond the footprint during construction.	Definition of indirect impacts is not only vague (but is better defined somewhat later in 3.7.2.2) but potentially incorrect. Indirect effects are defined as impacts removed in either time or space. For example, there can be indirect effects that occur within the construction footprint but are removed in time. The Draft EIS needs to be revised to provide a clear and correct definition of indirect effects.
	3.7.1.1	2	3	Natural heritage program databases of occurrences within 5 miles of the Proposed Route and Route Alternatives (Idaho Conservation Data Center [CDC] Wyoming Natural Diversity Database [WYNDD], and Nevada Natural Heritage Program).	The Draft EIS needs to be revised to provide rationale and literature citations that support a 5-mile analysis area and clearly identify the species this was applied to.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.7-3	11	Table 3.7-3	(Refer to table)	The Draft EIS needs to be revised to disclose what a blank cell in the table means. For example, does it mean that the particular species and/or its habitat does not occur within the 0.5 or 5-mile analysis area?
	3.7.2.2	23	3	TESPL-4 Environmental monitors shall be used to identify and mark aboveground populations of slickspot peppergrass and higher-quality microsites within 50 feet of the construction area, including access roads, so that they are avoided by construction equipment and vehicles. Full field clearances shall be conducted that meet USFWS protocols prior to construction. No construction shall occur within 50 feet of any slickspot peppergrass plant or habitat, including known occurrences of slickspot peppergrass (based on Idaho CDC data) even if aboveground plants are not observed during the surveys. Seeding during reclamation must use methods that minimize soil disturbance such as no-till drills or rangeland drills with depth bands, in areas of suitable habitat. Reclamation must use certified weed-free native seed. Excess soils will not be stored or spread on slickspots.	Slickpot Peppergrass: TESPL-4: text should be added that surveys would occur only in suitable habitat. As stated it sounds like they would occur on all federal lands.
	3.7.2.2	26	3	General mitigation measures for vegetation as identified in Section 3.6.1.2 would reduce these impacts to some extent; however, these measures alone do not ensure consistency with Forest Service (FSM 2670.32) and conformance with BLM (BLM Manual 6840) policies, which require that impacts to sensitive species be avoided or minimized. Measure TESPL-3, as identified by the Agencies and described above, applies to all TES plant species and would require that pre-construction surveys be conducted for other special status plant species that have been documented within the analysis area or have the potential to occur in the Analysis Area (Table 3.7-3 above). Therefore, with the implementation of TESPL-3, construction impacts to all TES plants species or populations that are located on lands managed by the BLM and/or the Forest Service would be avoided or minimized. Where avoidance is not possible, the Project would apply EPM OM-29, which applies to the relocation of plants.	TESPL 3 appears to be applicable to all TES plants on federal lands. Additionally, the referenced surveys should only be conducted where potential habitat is identified. The Draft EIS needs to be revised to clarify this.
	ESA-listed and Candidate Species				These sections in the DEIS make determinations regarding the particular species that should be made as part of the BA/BO process. Since the BA has not been provided to the public (and may not be completed) and there is no BO, how can the DEIS make these conclusions? The Draft EIS needs to be revised to provide detail on the consultation process that has been conducted to date and in particular, support for the conclusions the DEIS makes.
invasive Plant Species	3.8				

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.8.2.2	9	2	Existing invasive plant species may be treated prior to the onset of construction activities. Because various landowners and land management agencies have differing requirements regarding invasive species, whether an invasive plant species would be treated at a specific location and how it would be treated would depend on its status (e.g., is it a noxious weed or not), requests/requirements of the landowner or land management agency, the nature and extent of the infestation, and the surrounding conditions (e.g., predominance of invasive species near the Project). The following EPMs proposed by the Proponents would be followed during pre-construction treatments, as well as during construction activities, to limit the potential spread or introduction of invasive plant species:	This statement makes it seem that measures REC-1 through REC-15 would be implemented during pre-construction and construction activities when this is not the case. Furthermore, the DEIS leaves out important clarifying language from the Proponents measures (Appendix c-2, p. 4). The Appendix states "Mapped noxious and invasive weed species locations may be treated prior to transmission line construction. In Idaho, weed species on the EDRR list will be treated prior to the start of ground disturbing activities. For other weed species, the decision to treat prior to the start of construction activities will be based on the nature and extent of the infestation, surrounding conditions (e.g., predominance of weeds outside of project areas), landowner permission, and the construction schedule. The intent is for Project construction activities to not be delayed to facilitate pre-construction treatment of noxious and invasive weeds." The Appendix also states that measures REC-1 through REC-7 are for pre-construction activities. REC-8 through REC-15 are to be implemented during construction activities. The Draft EIS needs to be revised to be consistent with the referenced appendix..
	3.8.2.2	11	1	Revegetation of disturbed areas with native species is essential to limit the spread or establishment of invasive plant species. Therefore, disturbed areas would be revegetated with native plant species adapted to local site conditions to establish long-term, productive, self-maintaining plant communities that are compatible with existing land uses. The final Reclamation Plan would include success criteria for determining whether revegetation efforts have been successful and what remediation requirements would be implemented if the success criteria are not met. The Framework Reclamation Plan for Construction Activities in Appendix C-2 provides details of the proposed revegetation activities	The Draft EIS erroneously states that disturbed areas will be reseeded with native species. While native species may be used in certain locations, nonnative species will also be used as appropriate (e.g., when reseeding is conducted as a stabilization measure or to keep out invasive species such as cheatgrass or to meet specific landowner requests). The Draft EIS needs to be revised to disclose this.
	3.8.2.2	13	4	Revegetating disturbed areas with "desired vegetation" promptly after the initial disturbance (as outlined in the Proponents' EPM OM-17) is an essential component needed to limit the spread and establishment of invasive plant species; however, "significantly disturbed areas" are not explicitly defined within the Revised Plan for Operations, Maintenance, and Emergency Response Activities. The Proponents would need to clearly define this term, in order to ensure that they (the Proponents or construction contractor) would adhere to the commitment to revegetate all disturbed areas that are not permanently occupied by Project facilities. In addition, measures would be needed to stabilize any areas that cannot be revegetated within a reasonable time after initial disturbance (potentially due to unforeseen environmental conditions).	PacifiCorp will submit a revised plan of operations addressing the concerns expressed in the Draft EIS. We recommend the Draft EIS be revised to disclose this. Send to Brian for re-write.
	3.8.2.2	13	Weed-5	During operations, access roads and maintenance areas shall be surveyed annually between May 1 and September 30 (or as determined by Agency staff) for the presence of new weed introductions and existing invasive plant species. Coordinate with Agency specialists to identify the most appropriate time for survey. A weed control program would be implemented if new weeds were found, which would define how and when these invasive plants would be treated. Weeds shall be treated before their seed heads have become viable, or if heads will become viable, whole plant removal of all weeds shall occur before seed drop occurs.	Committing to hand pulling of weeds will be a labor-intensive and expensive control measure. If properly monitored, weed infestations can more easily be controlled with herbicides. We recommend the Draft EIS be revised to delete the last sentence of this mitigation measure.
Wetlands and Riparian Areas	3.9				

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.9.1.3	3	2	There are no specific laws protecting riparian areas; however, the land management plans of federal agencies provide protections for riparian areas including BLM's no net loss of wetland/riparian habitat policy. Federal agency management goals are to maintain, restore, and improve riparian areas to protect water quality, improve water retention and groundwater recharge, provide wildlife habitat, support biodiversity, and other goals. The BLM and Forest Service evaluate the functional condition of riparian areas using a qualitative method called assessment of proper functioning condition (Pritchard 1998). "Properly functioning" means the hydrological, vegetation, and soil erosion/deposition components on a stream system are in working condition, are resilient to disturbance, and provide adequate vegetation, landform, or debris to protect water resources, habitat, and biodiversity. Proper functioning condition can be applied for both lotic (streams) and lentic (ponds, wetlands) systems. The evaluation procedures for delineating the condition of these areas are different for each system and are more clearly defined in the BLM technical documents (Burton et al. 2008; Smith 2008). The assessment of proper functioning condition should be used in conjunction with more quantitative methods; it is not a substitute for monitoring but a tool for identifying smaller scale areas (step-down process)	We recommend that the Draft EIS be revised to provide a citation for this policy.
General Wildlife & Fish	3.10				
	3.10.1.1	2	2	The Analysis Area, for the purposes of terrestrial wildlife habitat, was set as a 1-mile-wide area centered on the Proposed Route, the Route Alternatives, and access roads (0.5-mile on either side of the centerline of each route or road), and a 0.5-mile buffer around all fly yards, laydown yards, staging areas, and tensioning/splicing sites (see Section 3.1 – Introduction). This distance was chosen so that indirect effects to wildlife would be captured. While ground clearing and the transmission line itself would take up only a small percentage of the Analysis Area (approximately 40,300 acres of the 16,082,500-acre Analysis Area cleared during construction, or 0.3 percent), it is necessary to utilize an Analysis Area that extends beyond the limits of direct impacts in order to capture the areas that may experience indirect impacts. Direct impacts to habitat and to species living in the immediate area of construction would occur at the actual footprint of disturbance during construction, which includes the clearing of vegetation and other activities at construction areas for each transmission structure, access roads, laydown yards, fly yards, and tensioning and splicing areas. Indirect impacts would extend beyond the location of construction and operations activities and include noise and edge effects (see Construction under Section 3.10.2.2 for a discussion of edge effects). Construction- and operations-related noise, including from helicopters, is expected to attenuate below annoyance levels in less than 0.5 mile (see Section 3.23 – Noise). This buffer would also include edge effects caused by vegetation removal. Therefore, the Analysis Area would encompass most indirect effects to wildlife	There is a lack of supporting documentation in this section for the 1 mile analysis area (0.5 miles either side of centerline). The Draft EIS needs to be revised to provide the supporting data and rationale upon which this assumption is based.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.1.3	5	last	...The USFWS has since released some documents providing interim guidance for external partners on how to avoid violating the Eagle Act, including a document specifically for golden eagles (Pagel et al. 2010; USFWS 2010a). These documents describe suggestions for consultation with agencies, what analyses to conduct and include in documents, and survey protocols.	Pagel et al. (2010) describes general protocols to conduct surveys for golden eagles. However, the USFWS 2010a reference is a region 8 document and it is not clear why it is included in this DEIS. While region 8 include Nevada, which does include a short segment of an alternative route, it is incorrect to imply that the document applies to the entire project. Idaho is part of the USFWS's region 1 and Wyoming is part of region 6. The text acknowledges that the USFWS documents are "suggestions" for analyses and survey protocols, but then require that all are adhered to. The DEIS incorrectly cites Smith 2010 (a HawkWatch raptor migration study). IPC believe they meant to cite Pagel et al. 2010. Both the Pagel et al. 2010 and the USFWS 2010a documents are interim documents and are therefore subject to change. IPC needs more specific information and or guidance than "All suggestions for analyses and survey protocols issued by the USFWS".
	3.10.1.4	9	1	...in portions of the Twin Falls, Pocatello, Kemmerer, Rock Springs, and Rawlins BLM FOs from April 1 through April 28, 2008. Raptor species present in the Analysis Area are analyzed in this section regardless of whether they are sensitive or have special status. Special status raptors are also addressed in Section 3.11 – Special Status Wildlife and Fish Species. Ravens (Corvus corax) are included in the raptor discussion because of their importance as predators to many species and their tendency to increase along transmission lines (Engel et al. 1992). Seven previously unrecorded active raptor nests were identified: two active bald eagle nests, one golden eagle nest, one red-tailed hawk nest, one unidentified raptor nest, and two raven nests (Tetra Tech 2009a). Ground surveys for raptor nests were conducted along a portion of Segment 2 in the Rawlins FO on June 4 and 5, 2008. No active nests were discovered during the ground surveys, while one inactive golden eagle nest was observed. Field searches for northern goshawks (Accipiter gentilis) and flammulated owls (Otus flammeolus) were also carried out in June 2009 on the Caribou-Targhee NF, in accordance with the Caribou Forest Plan. Surveys for northern goshawks were also carried out in July 2010 on the Medicine Bow-Routt NFs, in accordance with the Medicine Bow Forest Plan. Neither of these surveys found any territorial birds or active nests	Engel et al (1992) did not find an increase in ravens along a transmission line. Rather, they determined that ravens already present in the area started roosting in large numbers on a newly built transmission line. Please see Attachment A for additional comments on predation and greater sage-grouse.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.1.4	9	last	To assess the impact of fragmentation on habitat, the current level of fragmentation was compared to the expected level that would occur following construction. Fragmentation caused by roads, transmission lines, and both roads and transmission lines was analyzed. Fragmentation from transmission lines was analyzed separately to account for species that will readily pass under or over them. Some species, however, may avoid areas containing transmission lines, so these structures would contribute to fragmentation of their habitat. The levels of fragmentation (current and expected) were assessed within an 8-mile buffer centered along the Project's route. Because Project-specific remote sensing was not conducted out to this distance, regional GAP data were used for habitat types and locations. The current conditions were first assessed via GIS analysis, using existing developments (excluding transmission lines) and natural breaks in habitat types. Existing roads were shown on the ESRI "Streetmap" data layer, and other developed areas were retrieved using GAP data. These data were used to calculate road densities within the 8-mile-wide buffer. The data baselayer used to assess existing transmission lines was the ESRI "Powermap" data layer. Expected levels of fragmentation were assessed by adding the proposed roads to the existing road fragmentation data, and the expected transmission route to the existing transmission fragmentation data. All these data sets were then combined into one data layer, which represented the expected level of fragmentation from existing roads, developments, and transmission lines, plus the addition of the proposed roads and transmission lines. These data allowed the assessment of the number of fragments and the average...	The DEIS needs to provide the specific species and literature citations to support these statements.
	3.10.2.2	20	1	The Proponents have attempted to minimize fragmentation resulting from the Project by avoiding routing the line through large blocks of contiguous habitat. The primary way in which the Project would affect the degree of fragmentation is through the clearing of vegetation for the ROW and access roads. For some species, the generally 8-foot-wide permanent access roads (14 to 16 feet wide during construction) could serve as a barrier to movement, thereby isolating subpopulations and increasing the risk of local extirpation. (This would be predominantly experienced by smaller species or those less likely to move through open areas devoid of vegetation such as the pygmy rabbit, discussed in Section 3.11 – Special Status Wildlife and Fish Species). Although roads may not serve as a barrier to movement for all species, roads can reduce habitat quality by creating edge effects (discussed below). As the effects of fragmentation differ depending on the species considered, specific effects of fragmentation on individual species groups will not be addressed within this general habitat fragmentation discussion, and will instead be addressed within the species-specific discussions in this section and in Section 3.11.	The DEIS needs to provide the specific species and literature citations to support these statements.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.2.2	22	2	Temporary (occurring during the construction period only) impacts on habitat would include the clearing/use of laydown yards or fly yards for storage and assembly of equipment and structures during construction. Areas that contained native vegetation prior to construction would be restored in accordance with the Proponents' Reclamation, Revegetation, and Weed Management Plan (mitigation measures WEED-1 through WEED-6 in Section 3.8 – Invasive Plant Species). Areas not containing native vegetation prior to construction would be successfully reseeded with native vegetation, but there would be no ongoing effort to keep surrounding non-native species from encroaching onto the disturbed area, except on federal land. This would be in accordance with EO 13112, which requires federal agencies to prevent the introduction of invasive species and to not cause or promote the introduction or spread of invasive species (see Section 3.8.1.3). All revegetation efforts would be conducted in accordance with landowners' or land management agencies' requirements. Seed mixtures for use on private lands would be prearranged with the landowner (WEED-1, OM-17). Therefore, the spread of noxious weeds due to construction of the Project is not expected to have an appreciable impact on wildlife habitat. In addition, the Proponents have proposed to reduce the construction-related impacts on habitat through dust control during construction (EPM AR-2, Appendix C-1).	"Areas not containing native vegetation prior to construction would be successfully reseeded with native vegetation, but there would be no ongoing effort to keep surrounding non-native species from encroaching onto the disturbed area, except on federal land." It is not practicable to manage a narrow stretch of land to reintroduce native vegetation when it intersects large populations/infestations of non-native/noxious weeds without the adjacent lands being managed as well.
	3.10.2.2	22	WILD-12	Any areas that may require blasting will be identified and a blasting plan will be submitted to the appropriate agency for approval. Blasting within 0.25 mile of a known sensitive wildlife resource will require review and approval by the appropriate agency.	"WILD-12 Any areas that may require blasting will be identified and a blasting plan will be submitted to the appropriate agency for approval. Blasting within 0.25 mile of a known sensitive wildlife resource will require review and approval by the appropriate agency." What is the procedure and timeframe in which the appropriate agency will provide review and approval?
	3.10.2.2	23	2	Indirect effects on habitat during the construction period would include fugitive dust dispersing from the immediate construction area and air pollution from the diesel motors used by the construction equipment. Impacts from fugitive dust and air pollution would last longer than the construction timeline. High levels of fugitive dust can impact the growth of some organisms, especially mosses and lichens, and impact drinking water. The effects of air pollution could include an increase in the acidity of rain, which could harm plants and amphibians, and contribute to global climate change. Most impacts from fugitive dust would last only until the next rain event, when the dust is washed away and diluted. The immediate impacts from air pollution caused by vehicles would decrease in a matter of hours as particles dilute in the air and settle out; however, the exhaust could combine with other effects of air pollution and cumulatively have a more lasting effect.	The Draft EIS needs to be revised to clearly disclose what the specific "other effects of air pollution" would be and which species found in the project area would be affected.
	3.10.2.2	26	1	The Proponents have proposed to supply monitors to determine seasonal occupancy of various big game restricted areas. The Agencies reject the monitoring proposal and require that only appropriate Agency personnel may determine presence or likely presence of big game species in restricted areas. Therefore, the Agencies have identified the following measure to reduce impacts to big game:	This paragraph states that the agencies may be the only ones to determine presence of big game in restricted areas yet the Proponents EPM (including monitoring) is still included. If this monitoring is acceptable, occupancy decisions by monitors should be acceptable as well. We recommend the Draft EIS be revised to correct this inconsistency.
	3.10.2.2	33	WILD-8, Tab 3.10-3,	Flight diverters will be installed and maintained where the transmission line crosses rivers at the locations identified in Table 3.10-3. The flight diverters will be placed on at least one of the higher conductors or ground wires at each river crossing in order to reduce avian collisions. Additional locations may be identified by the Agencies.	MM states that diverters must be installed, however, no guidance as to how often (one per span). Need to make sure this is clarified in EPC Specs and POD

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.2.2	34	1 (under Raptors heading)	Direct impacts on raptors during construction could include collision with Project structures, electrocution, disturbance due to construction noise, fugitive dust, and visual disturbance. Raptors are particularly sensitive to disturbance during nesting and brooding, and some construction activities could cause nest failure or abandonment. In order to minimize the risk of this, the Proponents would follow timing restrictions and monitoring requirements enforced by the Agencies to reduce disturbance to nesting raptors (see Appendix I). All suggestions for analyses and survey protocols issued by USFWS (Smith 2010; USFWS 2010a) would also be adhered to. Federal, state, and local jurisdictions have requested minor changes to the Project's design and additional changes will also likely occur prior to the Final EIS. Therefore, the BLM and cooperating agencies have identified the following mitigation measure:	"Direct impacts on raptors during construction could include collision with Project structures, electrocution, disturbance due to construction noise, fugitive dust, and visual disturbance." Also on page 36 (3rd paragraph from bottom) it states: "The Proponents' Avian Protection Plan states that if mortalities due to electrocution are documented, changes to the distribution lines would be made in order to avoid future mortalities (such as by changing the arrangement of the power lines or by excluding birds from certain areas). Therefore the potential for raptor electrocution would be minimal." The Proponents will construct distribution lines in accordance to avian safe standards, thereby effectively eliminating or greatly reducing the risk of electrocution even further than what is inferred in the DEIS.
	3.10.2.2	36	WILD-6	As part of their annual aerial flight line maintenance activities, the Proponents would document nesting activity (by species) on any towers constructed as a result of this Project. This would occur after the first year of construction until year 10 of operations. Results would be provided to the applicable land management agency.	"WILD-6 As part of their annual aerial flight line maintenance activities, the Proponents would document nesting activity (by species) on any towers constructed as a result of this Project. This would occur after the first year of construction until year 10 of operations. Results would be provided to the applicable land management agency." What is the purpose of such a survey and data? The Companies do not see an appreciable benefit to raptor species by conducting such an annual survey for ten years. Justification for such a requirement must be provided.
	3.10.2.2	36	WILD-6	As part of their annual aerial flight line maintenance activities, the Proponents would document nesting activity (by species) on any towers constructed as a result of this Project. This would occur after the first year of construction until year 10 of operations. Results would be provided to the applicable land management agency.	The Draft EIS needs to be revised to disclose how this data would be used and how it would benefit birds in the project area.
	3.10.2.2	40	last	The Proposed Route would affect 5,022 acres during operations from ROW maintenance tower bases, permanent access roads, and areas encompassed by substations (Appendix D, Table D.6-3)....	The DEIS implies that this is a new impact and appears to double count impacts. Tower bases, permanent roads, and substation impacts are permanent and have been accounted for in the construction impacts. The Draft EIS needs to be revised to clearly differentiate between temporary and permanent impacts.
	3.10.2.2	40	1 from bottom	Outside of the permanent ROW, vegetation would be allowed to regrow. Although this is classified as a "temporary" impact, in the case of sagebrush, for example, it would affect several generations of wildlife that depend on this habitat type, such as sage sparrows, until vegetation could grow back and regain its wildlife habitat function. Vegetation removed within the permanent ROW would be maintained every 3 to 10 years (annually in some places where vegetation grows quickly) so that only grasses, forbs, and other low-growing plants would be present during the life of the Project.	"Outside of the permanent ROW, vegetation would be allowed to regrow. Although this is classified as a "temporary" impact, in the case of sagebrush, for example, it would affect several generations of wildlife that depend on this habitat type, such as sage sparrows, until vegetation could grow back and regain its wildlife habitat function. Vegetation removed within the permanent ROW would be maintained every 3 to 10 years (annually in some places where vegetation grows quickly) so that only grasses, forbs, and other low-growing plants would be present during the life of the Project." Vegetation would be allowed to grow within the permanent ROW. The above quotes are somewhat misleading. It should be clarified that "tall-growing" species that are not compatible with power lines are removed and low growing species encouraged.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.2.2	41	3	Existing road densities on the Proposed Route vary from 1.3 to 2.2 miles of road per square mile. Resulting road densities after the Project is completed would vary from 2.1 to 2.7 miles of road per square mile. The impacts of fragmentation from roads would vary by species. While big game species can easily cross roads, for example, smaller or less mobile animals could experience some habitat fragmentation from the presence of roads. (See the discussion of fragmentation effects found in the previous Construction section, because these effects would continue through Project operations.) Trees adjacent to roads and the transmission line would also be trimmed to keep branches from blocking roads or coming into contact with the transmission line. This could increase the effects of fragmentation and edges somewhat. Fragmentation could also be caused by the transmission line itself. Although transmission lines are not typically considered contributors to habitat fragmentation except in forests, there is concern that some sagebrush-associated wildlife species, such as the greater sage-grouse, avoid tall structures (see grouse discussion in Section 3.11.2). Therefore, the transmission poles and line may contribute to habitat fragmentation in the sagebrush habitat type by inducing some wildlife species to avoid the area. Tables D.10-3a and b in Appendix D list the number and average patch size of fragments resulting from existing roads and compare this to the post-construction conditions along each segment and alternative. Tables D.10-4a and b in Appendix D make the same comparisons as Tables D.10-3a and b; however, they consider only transmission lines as the source of fragmentation. Tables D.10-5a and b in Appendix D compare the pre- and post-construction levels of fragmentation when roads and transmission lines are considered jointly.	These statements imply that other species will avoid transmission lines but does not provide the specific species or literature to support the statement. The Draft EIS needs to be revised to provide rationale and supporting data for such statements.
	3.10.2.2	41	last	Disturbance from maintenance activities associated with the Proposed Route may cause wildlife to avoid certain areas. In habitat types similar to those in the Analysis Area, deer and elk have been shown to avoid areas within 650 feet of roads, including roads used only by four-wheelers (Rost and Bailey 1979). Therefore, although the presence of a road in itself may not cause habitat fragmentation for large species such as deer and elk due to breakup of contiguous habitat, roads may fragment habitat by disturbing animals and keeping them away from roads. In a study on roads' effects on elk, Lyon (1983) reported that with a road density of 1 mile per square mile, habitat effectiveness for elk declined by at least 25 percent. In a study in southwest Wyoming, densities of sagebrush obligates, particularly Brewer's and sage sparrows, were reduced by 39 to 60 percent within a 330-foot buffer around four unimproved, dirt roads with traffic volumes of 10 to 700 vehicles/day associated with natural gas exploration (Ingelfinger and Anderson 2004). Studies elsewhere have shown no effect to grassland birds (bobolinks and meadowlarks) at traffic volumes of 3,000 to 8,000 vehicles/day on a small local street; however, effects were detectable up to 3,940 feet away from the road when traffic volumes rose to 30,000 vehicles/day on a multilane highway (Forman et al. 2002). Most access roads would be used approximately once per year by Proponents' staff, though substations would be accessed approximately once per month. Only minimal vegetation management would be necessary over most of the route, as the naturally occurring vegetation is low-growing. Annual post-construction surveys would be carried out by the Proponents for a minimum of 3 years to ensure that reclamation is successful, or as decided by the land-managing agency (Appendix C-2).	"Disturbance from maintenance activities associated with the Proposed Route may cause wildlife to avoid certain areas." Should read: "Disturbance from maintenance activities associated with the Proposed Route *and Route Alternatives* may cause wildlife to avoid certain areas."

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.2.2	44	last	An operations impact that could impact big game is increased human presence in the Analysis Area. Project-related operations activities include biannual helicopter flights over the line and approximately annual access by truck, all-terrain vehicle, and foot. See Appendix C-4 for more details on operations and maintenance activities. Vehicle, helicopter, and human presence could impact big game animals by disturbing them and displacing them temporarily from preferred habitat areas, including from winter range and parturition areas. This displacement could cause animals to move to areas containing less quantity or quality of forage, increase exposure to predation, or affect reproductive activities. On winter range, disturbance could affect winter survival by causing animals to mobilize energy reserves that are needed to survive the winter. A decrease of energy reserves in females during the winter could also cause decreased reproductive success, by preventing pregnancy, causing fetal loss, or resulting in less fit offspring. Disturbance by humans and vehicles in the Analysis Area could also impact reproductive success if females are sufficiently disturbed to not provide adequate care for young. The Proponents would not conduct operations and maintenance activities on winter range during closure periods (see Appendix C-4). Unauthorized use of the ROW could also increase harvest of big game animals. To reduce an increase in big game harvest due to unauthorized use of Project-related roads, the Proponents would install gates or other barriers.	"Project-related operations activities include biannual helicopter flights over the line and approximately annual access by truck, all-terrain vehicle, and foot." This reads as though there is annual access by truck, ATV and foot. The Draft EIS should be revised to read "Project-related operations activities include biannual helicopter flights over the line, approximately annual access *on-the-ground using* truck*s or* all-terrain vehicle*s* , as well as *periodic* foot traffic *as needed* ."
	3.10.2.2	46	last	Project operation is expected to have only minor impacts to most migratory bird and game bird individuals, including Species of Conservation Concern and Game Birds Below Desired Condition, because the presence of the transmission line, structures, and access roads do not present barriers to movement through fragmentation, create...	The Draft EIS needs to be revised to disclose the species that comprise “Species of Conservation Concern and Game Birds Below Desired Condition”.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.2.3	60	Conclusions	Habitat Fragmentation The habitat type that would see the greatest number of additional patches created by the Proposed Route would be grasslands, with 369. The habitat type that would experience the greatest drop in average patch size by construction of the Proposed Route, Segment 1E is forest/woodlands, with a decrease of 416 acres. The habitat types that would be least affected by fragmentation by construction of the Proposed Route along Segment 1E are riparian/wetland and agriculture/disturbed. Alternative 1E-A would result in a similar number of patches as the comparison portion of the Proposed Route in all habitat types, but would decrease the average size of remaining patches over the Proposed Gateway West Transmission Line Draft EIS Chapter 3 – Affected Environment and General Wildlife and Fish Environmental Consequences 3.10-56 Route in shrublands, grasslands, and riparian/wetland. Average patch size would be bigger than along the comparison portion of the Proposed Route under Alternative 1E-A in forest/woodlands, and agriculture/disturbed. Alternative 1E-B would result in smaller average patch size than the comparison portion of the Proposed Route only in agriculture/disturbed. It would create more patches than the comparison portion of the Proposed Route would in forest/woodland, grassland, and agriculture/disturbed. Alternative 1E-C would cause less fragmentation than the comparison portion of the Proposed Route in all five habitat types except for grasslands. Alternative 1E-B would result in the smallest decrease in average remaining patch size as compared to the comparison portion of the Proposed Route, while Alternative 1E-A would result in the smallest increase in patch counts.	Habitat Fragmentation: Sentence dealing with 1Wc discusses increase on fragmentation acres/patches. The Draft EIS should clearly disclose the rationale for this conclusion considering that 1Wc would be located in habitat already fragmented by an existing line with an existing road access system.
	3.10.2.3	65	Fish	There are two stream crossings proposed for Segment 3 (three on BLM-managed land and three on private land), and a total of 8 acres of riparian vegetation would be cleared for construction. Of these 8 acres, 1 are on federal land, administered by the BLM. During operations, 1 acre of riparian vegetation would remain cleared (Tables D.9-1 and D.9-2 in Appendix D).	Clarify stream crossing sentence. The sentence starts by stating 2 crossings but in the parenthesis, it discusses 3 on BLM and 3 on private lands.
	3.10.2.3	77	Top	Alternative 7J, which is a variant of the State Line Route also proposed by local landowners, would not terminate at the Cedar Hill Substation. This alternative, referred to as the Rogerson Alternative, would require a different substation be constructed near a 345-kV existing transmission line (approximately 24 miles southwest of the Cedar Hill Substation; see Appendix A, Figure A-9). The tables and discussion in this document compare 7J (202 miles) with the corresponding portion of Segment 7/9 (118.1 miles of Segment 7 and 25.8 miles of Segment 9, for a total of 143.9 miles). All other Segment 7 alternatives are compared to Segment 7 of the Proposed Route (118.1 miles) only.	Segment 7: Reference to Rogerson Alternative states that it would not terminate at Cedar Hill but rather 24 miles southwest. However, the Draft EIS needs to be revised to disclose that there would still be the need for a station of some sort at Cedar Hill to meet the project purpose and need to provide safe and reliable power.
	3.10.2.3	80	Fish	A total of 18 stream crossings are proposed for the Proposed Route of Segment 7. Of those on federal land, 7 of the 11 along Alternative 7I would be on NFS land. There would be 5 acres of riparian vegetation cleared during construction of the Proposed Route, less than 1 acre of which would be kept clear during operations. Of the riparian vegetation removed that is on federal land, there is 1 acre along Alternative 71 and less than 1 acre along Alternatives 7I and 7J that lie on NFS land. Table 3.10-32 compares the Proposed Route of Segment 7 with Alternatives 7A through 7J in regard to construction impacts to fish resources.	5th sentence states "there is one acre along Alternative 71 and less than one acre along 7I and 7J..." The Draft EIS needs to be revised to clearly disclose what Alternative 71 is. If this is a typo, it needs to be corrected.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.10.3	101	2	WILD-7 On federal lands, guy wires should be marked with bird deterrent devices to avoid avian collisions with structures on public lands (I.M. 2010-022).	I.M. 2010-022 is misapplied and is specific to Wind Energy structures including turbines and MET tower supports. I.M.2010-022 states: Wind Energy Associated Structures • To reduce the risk of collisions, avoid the use of guy wires for turbine or MET tower supports. All existing guy wires should be marked with recommended bird deterrent devices. • The siting of new temporary MET towers must be avoided within 2 miles of active sage-grouse leks, unless they are out of the direct line of sight of the active lek. Comments of the U.S. Fish and Wildlife Service to the FCC on 47 CFR Parts 1 and 17, WT Docket No. 03-187, FCC 06-164, Notice of Proposed Rulemaking, "Effects of Communication Towers on Migratory Birds" http://www.wirelessestimator.com/t_content.cfm?pagename=FWS%20Response FCC NPRM Request: "We seek comment on the effectiveness of [guy] wire markings in mitigating migratory bird collisions with communication towers." (p. 67514)
Special Status Wildlife & Fish	3.11				
	3.11.1.1	2	1	...In addition, data on some TES wildlife and fish species are currently available for broad areas adjacent to, but outside of the original Analysis Area; therefore, the Analysis Area for some TES species was expanded to include this known information. Table 3.11-1 summarizes these known data, as well as their spatial extent and the extent that they added to the original Analysis Area. Gray wolf (Canis lupus) Known locations of wolf packs	It appears that the DEIS is expanding the Analysis Area simply because data are available and not because there is information that would support the assertion that the project could have an impact on a species at a certain distance. It is inappropriate to define an Analysis Area based on data without consideration of the impacts you are trying to assess.
	3.11.1.1	4	1	The Analysis Area used to assess the effects of habitat fragmentation was set as an 8- mile-wide buffer around the Project's centerline (see Section 3.10.1.1). An 8-mile-wide buffer was chosen to assess a large enough area to capture the current and existing level of fragmentation, without assessing too large of an area, which would mask the effects of the Project's contribution to the area's fragmentation.	The DEIS provides no information or literature citations to support the selection of an 8-mile buffer. Exactly how did the BLM decide 8-miles was just right? Furthermore, p. 3.11-70 states "If the response of the greater sage-grouse to transmission lines is similar to those recorded by Pruett et al. (2008) for the lesser and greater prairie-chickens, then edge effects resulting from newly fragmented habitats could extend approximately 330 feet into habitat patches." This is significantly less than 8 miles.

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	3.11.1.3	5	1	Regulations that address and govern impacts to TES species include the ESA and various land-management plans from the BLM, Forest Service, and state agencies. Following is a discussion of the relevant regulations	This section fails to identify and describe one of the key regulations affecting project routing in Wyoming – the Governor of Wyoming's Executive Order regarding greater sage-grouse. The Wyoming Executive Order 2011-5 is a critical document that has informed the routing and siting of the transmission line in order for the Project to be incompliance with this order. Additional detail regarding the EO and influence the EO may have on routes and alternative routes should be disclosed and described in this section to inform the reader. The following or similar should be added: "Wyoming Executive Order 2011-5: Wyoming has developed the Core Area Strategy in attempt to "weave" the many on-going efforts to conserve the Greater Sage-Grouse in Wyoming into a statewide strategy and maintain a management mechanism to address threats to the grouse. This EO restricts development within the Core Areas. Transmission development within the Core Areas is allowable through meeting certain criteria or if it is developed within designated corridors. In order maximize use of the designated corridors and to be consistent with the EO, an additional route (Alternative 2C) was developed and follows the designated corridor through the Hanna Core Area. The designated corridors through core area where developed as utility corridors. Wyoming State Office and the Wyoming Game and Fish Department do not require additional mitigation for the portions of the project that utilize the corridors as they view the EO as mitigation in itself and therefore being consistent with the EO is mitigation."
	3.11.1.3	8	3	Only the Jarbidge and Owyhee Working Group have released their Conservation Plans;… In areas in Idaho where the Local Working Groups have not finalized their plan, the Conservation Plan for the Greater Sage-grouse in Idaho would apply.	The Draft EIS should be revised to provide the citations for these documents. The Draft EIS should also be revised to clearly identify the boundaries of the local working groups so it is clear which portion(s) of the project they are concerned and/or involved in.
	3.11.1.4	12	last	The Project has been proposed for an area with substantial public lands managed with the intent of conserving and improving wildlife populations and stopping or reversing population declines of sensitive species.	Management of public lands in the project area is not solely for the purposes identified in this statement. It is misleading to imply this. The Draft EIS should be revised to identify the multiple-use mandate that BLM and USFS is required to adhere to for the public lands crossed by the proposed project. This multiple-use mandate includes the provisions of right-of-way corridors for utilities infrastructure.
	3.11.1.4	16	5	Habitat for the greater sage-grouse was originally included in the remote sensing analysis. The original intent of this effort was to use this Project-specific remote sensing analysis to determine the quantitative impacts (i.e., acres of impacts) that would occur to greater sage-grouse habitats. However, an interagency group consisting of the BLM, USFWS, IDFG, and WGFD decided that the remote sensing data was insufficient to address direct and indirect project-related impacts	The Draft EIS needs to be revised to provide the specific criteria that were considered when determining that the analysis was insufficient and the rationale supporting that conclusion.
	3.11.1.4	16 - 20	Beginning with Paragraph 5	The group developed a four component Analysis Framework of Interstate Transmission Lines that could be used to analyze potential impacts to greater sage-grouse in this Draft EIS (found in its entirety in Appendix J).	The Framework does not appear to have measures that remove areas that are within an existing corridor from the DDC. Please explain how the BLM will address the apparent conflict between the project-wide analysis and resulting mitigation requirements with the Wyoming Governor's order that does not require mitigation if a project is located within an existing corridor. In other words, under what authority can the BLM require mitigation for impacts on private or non-federal lands when this is not required by the State of Wyoming and not addressed by the State of Idaho?

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.11.1.5	27	2	R1 habitats are defined as perennial native and non-native grasslands with high restoration potential. R2 habitats are defined as annual grass dominated areas (either shrubland or grassland) with low restoration potential. R3 habitats are defined as conifer encroachment areas with high restoration potential.	By omitting the full definition of R1 through R3 habitats, the DEIS is implying that these areas currently support, or are capable of supporting, greater sage-grouse. The July 2006 Idaho Sage-grouse Conservation Plan further defines R1 as "…that should provide suitable potential nesting habitat in the future, once sufficient sagebrush cover is re-established (at least 10% canopy cover). R2 is defined as "Areas dominated or strongly influenced by invasive annuals such as cheatgrass (Bromus tectorum) or medusahead rye (Taeniatherum caput-medusae) or similar species. Areas with sagebrush may be present, but, in general, understories are not suitable for sage-grouse." R3 is defined as "Areas where junipers (Juniperus spp.) and/or other conifer species are encroaching into sage-grouse habitat areas." The Draft EIS needs to be revised to include the full definition of the areas so readers can have the correct context to evaluate potential impacts.
	3.11.1.5	27 - 28	last & first	For the sake of this analysis, all leks in Nevada will be considered as occupied due to the limited length that Alternative 7I would cross this state	The DEIS should not assume that all leks are occupied because of the length of the segment. The DEIS should clearly identify if the leks are occupied or if data are not available. Just because it is convenient is not a supportable rationale for the assumption and resulting analysis.
	3.11.1.5	29	1	Based on the preliminary analysis (i.e., the results of the HEA are still pending), suitable greater sage-grouse habitat occurs along all segments, and the Proposed Route would cross through approximately 677.3 miles of suitable sage-grouse habitat (see Appendix D, Table D.11-3).	It is not clear from the text or the table if suitable sage-grouse habitat includes areas identified as R1-R3 in Idaho. It is also not clear what vegetation categories are considered suitable habitat and the basis for their inclusion. The Draft EIS needs to be revised to disclose this information.
	3.11.2.2	57	last	Approximately 36 percent (394.1 miles) of the Proposed Route is located adjacent to (within 1 mile of) existing transmission lines, which already serve as nesting and perching habitats for raptors and ravens. In these areas, the Project would cumulatively add to the numbers of raptors and ravens that are already utilizing existing transmission lines in the general area. In the remaining areas where the Project would not be co-located with existing lines or other tall structures (such as portions of the line that cross through forested habitats), it would create new nesting and perching opportunities.	The Draft EIS should be revised to disclose the specific rationale supporting the conclusion that the Proposed Project would add to the numbers of raptors using the existing lines. The presence of another transmission line does not automatically mean the populations of raptors and ravens using existing lines will increase. Appropriate references and data supporting this conclusion needs to be disclosed to the public.
	3.11.2.2	58	TESWL-2	TESWL-2 The Proponents shall work with the applicable land-management agencies to develop a survey protocol that would be conducted in conjunction with annual operations and maintenance surveys (as outlined in the Proponents' Avian Protection Plans). The goal of these raptor-raven surveys shall be to identify whether populations of raptors and ravens are consolidating along the Project, and will be done during the appropriate time of year. These surveys shall be conducted, at a minimum, along portions of the line that are located within 1 mile of identified concentrations of sensitive raptor and raven prey species (including the black-footed ferret, burrowing owl, grouse species, mountain plover, prairie dogs, and pygmy rabbit). The Proponents and applicable land-management agencies shall work together to identify measures to limit predation rates on sensitive species within areas where raptor and raven populations are considered to be consolidating (limited to areas near sensitive species).	Black-footed ferrets spend much of their time underground pursuing their prey. Is there any information in the literature that black-footed ferrets are prone to predation by nesting ravens and raptors, given their fossorial habits? Furthermore, placement of anti-perch deterrents (TESWL-3) is expansive and should be carefully considered. If black-footed ferrets are unlikely to be predated because of their fossorial habitats, anti-perch devices are not likely to be useful in protecting the species and should not be required.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.11.2.2	58	1	Of the 708.8 miles of the Proposed Route that are not located within 1 mile of an existing line, about 485.8 miles are located within non-forested habitats (or 44 percent of the Proposed Route's length). It is in these areas that the effects of potential consolidation of raptor and raven populations on prey species would be most substantial (the risk of increased predation pressures by raptors and ravens would be applicable to all raptor/raven prey species that occur in open shrubland and grassland habitats)	The DEIS states that other developments exist along the proposed route and alternatives to the proposed route. No information has been provided if these structures already harbor nesting ravens and raptors. The GW transmission line is not constructed in an area that is devoid of human activities and impacts. In fact much of the non-forested habitats are in grassland, according to the DEIS. It is unclear what the cumulative effect the construction of the GW transmission line will have with respect to predation given the current habitat conditions. Rather than making a sweeping statement that that "the effects of potential consolidation of raptor and raven populations on prey species would be most substantial" a more detailed analysis where such predation would most likely to take place in non-forested habitats would better inform the lead agencies decision. As it is, "most substantial" means virtually nothing. Also, it is unclear what is considered "a consolidation of raptor and raven populations". Is this the colonization of the transmission line by nesting raptors and ravens? Apparently, there is a population of ravens and raptors present. Are these birds nesting on existing structures and is there concern that this population will all be "consolidated" on the newly built transmission line? The Draft EIS needs to be revised to provide an analysis of these impacts that is based on scientifically-defensible information and sound rationale.
	3.11.2.2	61	3	There is a very low possibility that the transmission line structures would be placed in riparian habitat; instead, it is common engineering practice to span riparian habitat with the conductors and place the towers outside riparian habitat. However, the Proponents may propose one or more access roads that cross riparian habitat. Disturbances within these areas could result in direct mortality of frogs during the clearing and construction of the stream/waterbody crossing. In addition, increased sedimentation could result, which if at high enough levels could impact tadpoles and eggs present at both at the crossing location itself and immediately downstream. Sedimentation could bury frog eggs and/or damage tadpole gills, resulting in mortality. Sedimentation would be controlled through implementation of the Proponents' SPCC Plan (Appendix C-1, Attachment C). In addition, the possibility of a spill of toxic materials into waterbodies would be limited due to the implementation of the Proponents' SWPPP (Appendix C-1, Attachment B; these measures would be applicable to all species that inhabit wetlands or waterbodies). Even with the implementation of these preventive and protective measures, the crossing of waterbodies by access roads should be avoided to the extent feasible; in addition, all necessary crossing should occur outside of forested riparian areas to reduce the amount of riparian vegetation that would need to be cleared	"Sedimentation would be controlled through implementation of the Proponents' SPCC Plan (Appendix C-1, Attachment C). In addition, the possibility of a spill of toxic materials into water bodies would be limited due to the implementation of the Proponents' SWPPP (Appendix C-1, Attachment B; these measures would be applicable to all species that inhabit wetlands or water bodies)." It would be more appropriate to state that sediment would be controlled through implementation of the SWPPP rather than the SPCC and that spills would be minimized due to the implementation of both the SWPPP and SPCC. That Draft EIS should be revised to clarify this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.11.2.2	63- 64	4	The USFWS's 12-Month Findings for Petitions to List the Greater Sage-Grouse as Threatened or Endangered (2010e) listed the following as potential impacts to the greater sage-grouse resulting from powerlines: 1) collisions/electrocutions, 2) consolidation of predatory birds along powerlines, 3) lower recruitment rates near lines, 4) habitat fragmentation, 5) degradation of habitat due to spread of invasive plant species, 6) impacts resulting from the line's electromagnetic fields, and 7) direct loss of habitat.	Knick et al (2010) state that "The underlying cause for population declines in this western species [greater sage grouse] is loss of suitable sagebrush habitat to meet seasonal requirements for food, cover, and nesting". Powerlines may have impacts on sage grouse as listed in the DEIS. However, only anecdotal information is available on collisions of sage grouse with distribution lines or telephone wires (UWIN 2010). Increased predation of sage-grouse due to nesting ravens and raptors is largely unsubstantiated. In fact, much of the literature on sage grouse predation in relation to transmission or distribution lines is anecdotal, limiting inferences from these studies (Ellis 1984, 1985b, 1987, 1989). Only one long-term study has been conducted to determine the effect of transmission lines on sage grouse recruitment rates (Blomberg et al 2010). This study showed no effects on sage grouse vital rates were found after 7 years of study of the Falcon-Gondor 345 kV line. Lastly, effects of habitat fragmentation on sage grouse due to powerlines has not been established (UWIN 2010). Wisdom et al (2011) found that distance to transmission lines [and distance to cellular towers], have unknown relations with sage-grouse population dynamics at regional extents. Sage grouse researchers agree that habitat degradation plays a major role in declining sage grouse populations in the western US. The Draft EIS should be revised to include the most recent information on sage grouse ecology and management in this analysis. For example, the publication by Knick et al (2010) should be referenced in the DEIS. See Attachment A for additional information.
	3.11.2.2	63- 64	last	To limit the potential disturbance to this species, one of the Proponents' primary goals while routing the Project was to avoid all leks by at least 0.25 mile (in accordance the BLM RMP requirements for "no surface occupancy," which was in place at the time of initial Project design in 2008).	To correctly portray what the Proponents did, we recommend that the Draft EIS be revised so the referenced text reads as follows: "To limit the potential disturbance to this species, the Proponent's routed the proposed transmission line to avoid all leks by at least 0.25 mile (in accordance the BLM RMP requirements for "no surface occupancy," which was in place at the time of initial Project design in 2008).
	3.11.2.2	64	1	surface occupancy," which was in place at the time of initial Project design in 2008). However, the centerline of the Project would come within 0.25 mile of a lek with an "undetermined" management status along Segment 10 and within 0.25 mile of a lek with an "occupied" management status along Segment 5 (see Table 3.11-4). In addition, the Proponents attempted to avoid leks by 0.6 mile to the extent possible, based on the assumption made at the time of initial Project design (2008) that the "no surface occupancy" requirement would increase from 0.25 mile to 0.6 mile (as of this date, the BLM "no surface occupancy" restriction has been increased to 0.6 mile). However, not all leks could be avoided by this distance (see Table 3.11-4) due to the need to avoid other sensitive resources (e.g., high-altitude mountain habitats that contain species listed under the ESA, or sensitive cultural resources that are protected by the various SHPOs).	"In addition, the Proponents attempted to avoid leks by 0.6 mile to the extent possible, based on the assumption made at the time of initial Project design (2008) that the "no surface occupancy" requirement would increase from 0.25 mile to 0.6 mile..." Should read: "In addition, the Proponents attempted to avoid leks by *0.65* mile to the extent possible, based on the assumption made at the time of initial Project design (2008) that the "no surface occupancy" requirement would increase from 0.25 mile to *0.65* mile..." (this comment also applies to 3.11-91, last paragraph)

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.11.2.2	68	2	Fences located in sage-brush habitats have been identified as a major cause of mortality for greater sage-grouse, due to these low-flying birds colliding with and becoming entangled within these fences (Stevens 2011)	The Draft EIS needs to be revised to fully disclose the context of the Stevens (2011) study. Stevens (2011) determined that sage grouse collisions with fences was highest near leks and rapidly dropped off with distance to leks. Furthermore, Stevens (2011) study indicated that collisions were influenced by technical attributes of the fences. Fences built with steel post showed higher collisions than those built with wooden posts and wider spacing between posts. Broad-scale modeling suggested probability of collision was influenced by region, topography, and fence density. Thus, if fence removal or modification is considered as a mitigation measure, only those fences should be modified or removed that have the highest probability of causing mortality to sage grouse. These are fences closest to leks, are exposed on higher terrain, and are less visible due to their construction.
	3.11.2.2	68	4	The Agencies have also identified the following mitigation measures, which are required as part of recent published BLM Instructional Memorandums. TESWL-14 Surface disturbance shall be avoided within 0.6 to 4 miles of occupied or undetermined greater sage-grouse leks from March 15 to July 15 in all portions of the Project except for Nevada. In Nevada, surface disturbance shall be avoided within view of or within 0.3 mile of all leks from March 1 to May 15; and within areas designated by Nevada as greater sage-grouse brood rearing areas from May 15 to August 15.	No Instructional Memorandums are listed. Please include which IM states no surface disturbance within 4 miles of occupied or undetermined leks. IPC is not aware of any BLM instructional memorandums limiting surface disturbance within 4 miles of leks.
	3.11.2.2	68	4	Indirect effects to the greater sage-grouse from the Project operations include … a potential avoidance of tall transmission structures that could result in an increase in habitat loss and fragmentation ….	The UDNR 2010 literature review found "…that there were no peer-reviewed, experimental studies designed specifically to evaluate the landscape effects of tall structures on sage-grouse." They found "…no 'peer-reviewed' manuscripts that reported results from experimental studies to document sage-grouse avoidance of tall structures, increased predation related to avian predators using tall structures as perches, increased mortality attributed to collisions, or habitat degradation and/or fragmentation attributed to tall structures." The literature synthesis "…did find professional opinions, personal observations, unpublished data, anecdotal references, and models that implicated tall structures as potential causal agents of the above effects on sage-grouse, and peer reviewed studies on the cumulative effects of oil and gas development and associated infrastructures on sage-grouse. The latter studies did not isolate tall structures, as defined by this project, as a specific mechanism affecting sage-grouse." The Draft EIS should be revised to disclose this relevant information related to transmission line impacts on sage-grouse.
	3.11.2.2	68	last	The distance that these effects could extend from the transmission lines (if they are used as roosting habitat by predatory avian species) depends on the hunting range the predatory avian species. For example, non-breeding pairs of ravens have been documented to travel an average of 4.3 miles (6.9 kilometers) (up to 38.8 miles [62.5 kilometers]) in Idaho from roost sites to food sources and 16.8 miles (27 kilometers) in Michigan (ranging from 0.5 to 91.3 miles [0.8 to 147.0 kilometers]), with breeding pairs often traveling up to 0.8 mile (1.3 kilometer) while hunting (Boarman and Heinrick 1999).	The Boarman and Heinrick (1999) citation is cited out of context. The Draft EIS needs to be revised to also note that the non-breeding pairs referenced in the study were travelling from roost to landfills – not hunting. In the Mojave Desert of California, breeding pairs hunted live food an average of 0.35 mile (0.57 kilometer) from their nests (Boarman and Heinrick 1999). Additionally, Sherman (1993) found that nesting ravens in the. Mojave Desert of California spent 75% of foraging time within 400 m of the nest, but at least once per day individuals flew several kilometers out of sight, probably to obtain water (Sherman 1993).
	3.11.2.2	68	4	Potential direct impacts from Project operations include the effects of the electromagnetic field on sage-grouse and collisions with Project structures.	The Draft EIS needs to be revised to provide the necessary citations to support this statement.

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	3.11.2.2	69 - 70	last & first	However, the distribution lines that serve the substations could provide an electrocution hazard to the greater sage-grouse, although this hazard would be minimal due to the limited number of places where new distribution lines would be constructed (at the Creston, Bridger, and Cedar Hill Substations), the short distances that these distribution lines would travel (between200 to 500 feet), and the fact that these distribution lines would be constructed in accordance with APLIC guidelines (i.e., designed to prevent avian electrocutions).	In order for a greater sage-grouse to be electrocuted they must first attempt to land on the power pole. Greater sage-grouse do not use power poles for perches. It should be sufficient to say neither transmission nor distribution lines are an electrocution hazard.
	3.11.2.2	70	last	Peer reviewed science that demonstrates an avoidance or non-avoidance of tall structures by the greater sage-grouse is either limited, or nonexistent in the current literature. This lack of evidence is related to a lack of peer-reviewed and controlled studies that can differentiate between the impacts related to tall structures and those related to other components of human developments (e.g., noise, human presence), as opposed to a true lack of evidence (UDNR 2010).	To say the lack of evidence in not really a true lack of evidence is confusing to say the least. There is a true lack of evidence that sage-grouse avoid tall structures. That does not mean they do or do not, it just means there is a lack of evidence to establish that relationship. To try and paint that as not really a true lack of evidence because we cannot show a clear connection smacks of bias. The Draft EIS should be revised to delete the sentence "This lack of evidence is related to a lack of peer-reviewed and controlled studies that can differentiate between the impacts related to tall structures and those related to other components of human developments (e.g., noise, human presence), as opposed to a true lack of evidence" as this statement makes absolutely no sense.
	3.11.2.2	71	4	Compensatory mitigation for impacts to greater sage-grouse and their habitats will likely be necessary due to the current declines in their population rates range-wide, the current concerns regarding their status, the magnitude of potential impacts that the Project could have on their habitats, and the impact that their potential ESA listing could have on the economic stability of Wyoming's oil and gas industry.	The only valid reason for requiring mitigation is due to impacts from the Gateway West project. The Companies are not responsible for mitigating impacts that resulted from previous BLM decisions nor are we responsible for the economic stability of Wyoming.
	3.11.2.2	82	last	The Proponents would conduct construction and decommissioning of culverts under a Construction General Permit required for stormwater operations, which includes the development of BMPs to protect surface water from stormwater runoff.	Generally, Construction General Permits are only required for disturbances of one acre or more; therefore, the statement should be revised as follows: If disturbance is one acre or more, the Proponents would conduct construction and decommissioning of culverts under a Construction General Permit required for stormwater operations, which includes the development of BMPs to protect surface water from stormwater runoff.
	3.11.2.2	91	3	However, roads could potentially serve as a barrier, and could fragment populations and habitat.	The Draft EIS needs to be revised to provide data, rationale, and analysis to support this conclusion
	3.11.2.2	93	3	The Agencies have identified TESWL-11 to limit the potential impact of the Projects construction of sharp-tailed grouse leks. TESWL-11 In areas where sharp-tailed grouse leks occur in proximity to greater sage-grouse leks, surface disturbance shall be avoided within 4 miles of occupied or undetermined greater sage-grouse leks from March 1 to July 15. In areas where sharp-tailed grouse leks occur in isolation from greater sage-grouse leks, surface disturbance shall be avoided within 1.2 miles of occupied or undetermined sharp-tailed grouse leks from March 15 to July 15.	The Draft EIS needs to be revised to provide rationale for the timeframes and distances used in TESWL-11.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.11.2.2	158	last	TESWL-3 H-frame structures shall be equipped with anti-perch devices to reduce raven and raptor use, and limit predation opportunities on special status prey species.	Deterrent devices would be most appropriate in perch-limited areas or to reduce use of specific pole perches in close proximity to a sage grouse lek or the presence of other special status species (Slater and Smith 20010). The Draft EIS should be revised to propose perch deterrents only where nesting ravens and raptors overlap with special status prey species.
				TEWSL-3 H-frame structures shall be equipped with anti-perch devices to reduce raven and raptor use, and limit predation opportunities on special status prey species.	Bui et al. (2010) studied raven activity in relation to land use in Wyoming. They found that raven occupancy near sage-grouse nests and broods was more highly correlated with sage-grouse success than were raven density and behavior, suggesting that the majority of nest predation by ravens is most likely carried out by resident territorial individuals. They concluded that managers attempting to reduce the potential effects of ravens on grouse reproduction should first reduce occupancy of important sage-grouse nesting habitat by ravens. Bui et al. (2010) noted that anthropogenic nest sites should be managed to reduce raven use through retrofitting or the installation of deterrent fixtures (i.e., strips, netting, screening) on old structures, covering well heads, modifying future engineering of structures to avoid providing suitable nesting platforms, egg removal, nest destruction, and harassment of nesting pairs.
					However, perch deterrents are not effective for precluding nesting and in fact can facilitate the accumulation and support of nesting material. Two studies conducted to study the effectiveness of perch deterrents reported ravens using perch deterrents to facilitate nesting. Lammers and Collopy (2007) found 3 common raven nests built using perch deterrents to support the nest. Likewise, Slater and Smith (2010) reported that a raven pair built a nest between the crossarm spikes installed to prevent perching. They noted that surveyors regularly observed adults and nestlings using crossarm deterrent devices and nearby conductors as perching substrates. Therefore, the Proponents support the use of steel H-frame structures with no anti-perch devices in habitat that supports special status prey species. Steel H-frame structures do not provide nesting substrate.
	3.11.2.2	158	last		Studies of the effectiveness of perch deterrents for excluding or reducing perching have reported varying results depending on the bird species and type of perch deterrent used. Lammers and Collopy (2007) observed avian predators perching on 345-kV towers retrofitted with perch deterrents during 50% of the 77 surveys conducted. Corvids and raptors overcame the deterrents by perching directly on them or on deterrent-free parts of the towers (e.g., on conductors [before electric current] or wire) and nesting on them. Of the avian predators Lammers and Collopy (2007) observed during surveys, 77% (n = 18) were perched on the horizontal arm of the towers, 19% (n = 5) on the tower wires, and the remainder on the crossarms and transposition towers. Lammers and Collopy (2007) found that perch deterrents did not appear to have an effect on the observed numbers of avian predators of concern to greater sage-grouse. However, they did report a reduction in avian predator use of overhead transmission line towers via shorter perching duration on the deterrents versus other available perching substrates.

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					Likewise, Prather and Messmer (2010) studied raptor and corvid response to perch deterrents in Utah and did not detect any difference in perching events by perch deterrent and controls. However, they did note that the perch deterrents had inherent design and placement flaws. Slater and Smith (2010) studied the effectiveness of spike perch deterrents on H-frame structures in Wyoming. They found that raven and raptor activity was significantly lower on the deterrent line compared with the control line, when comparing only those birds perching on the cross-arms or pole-tops that were subject to application of deterrent devices (i.e., they did not include observations of birds perched on conductors or cross-braces). When including all birds perched on the structures, golden eagles were sighted 268 times on the control line, whereas they were observed only 54 times on the deterrent line. Rough-legged hawks were observed more frequently on the deterrent line (171 observations) than the control line (53 observations) and used the static wire as a perch. Common ravens were sighted 68 times on the control line versus 50 times on the deterrent line. The authors noted that they filtered out all observations associated with the raven nesting on the deterrent line (i.e., raven sighting on the deterrent line would have been higher if those observations had been included) . Ravens were most frequently sighted using the static wire and crossbraces of the deterrent line, but were also observed using
					Slater and Smith (2010) noted that in contrast to the pilot study conducted 2 years earlier on the same structures (Oles 2007), they did not find that deterrent devices completely excluded raptors and ravens. They suggested that deterrent devices may lose some effectiveness as their initial novelty wears off. They conclude that deterrent use may be most appropriate in areas with few tall perches (both natural and man-made) or to reduce use of specific poles. The Draft EIS needs to be revised to incorporate this data into the analysis of the potential environmental effects of the proposed project.
Minerals	3.12				
Paleontological Resources	3.13				

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.13.1.3	5 & 6	last & first	Federal protection for significant paleontological resources applies to federally owned or managed lands. Federal legislative protection for paleontological resources began with the Antiquities Act of 1906 (P.L. 59-209; 16 U.S.C. § 431 et seq.; 34 Stat. 225), which requires protection of historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest on federal land. The Antiquities Act of 1906 forbids disturbance of any object of antiquity on federal land without a permit issued by the responsible managing agency. This act also establishes criminal sanctions for unauthorized appropriation or destruction of antiquities. The Federal Highways Act of 1958 clarified that the Antiquities Act applied to paleontological resources and authorized the use of funds appropriated under the Federal-Aid Highways Act of 1956 to be used for paleontological salvage in compliance with the Antiquities Act and any applicable state laws. In addition to the Antiquities Act, other federal statutes protect fossils. The Historic Sites Act of 1935 (P.L. 74-292; 49 Stat. 666; 16 U.S.C. § 461 et seq.) declares it national policy to preserve objects of historical significance for public use and gives the Secretary of the Interior broad powers to execute this policy, including criminal sanctions. NEPA (P.L. 91-190; 31 Stat. 852; 42 U.S.C. §§ 4321-4327) requires that important natural aspects of the nation's heritage be considered in assessing the environmental consequences of any proposed project. The FLPMA (P.L. 94-579; 90 Stat. 2743; U.S.C. § 1701-1782) requires that public lands be managed in a manner that protects the quality of their scientific values. The most explicit protection for paleontological resources was enacted in 2009. The Paleontological Resources Preservation Act of 2009 regulates who may collect fossils on public lands and where such fossils must be curated	The Draft EIS needs to provide a clear definition of what is a "significant paleontological resource." All of the listed laws and regulations have exemptions for common invertebrates and plant resources, which are typically not seen as significant paleontological resources.
	3.13.1.3	6	2 - last sentence	In addition to the Antiquities Act, other federal statutes protect fossils. The Historic Sites Act of 1935 (P.L. 74-292; 49 Stat. 666; 16 U.S.C. § 461 et seq.) declares it national policy to preserve objects of historical significance for public use and gives the Secretary of the Interior broad powers to execute this policy, including criminal sanctions. NEPA (P.L. 91-190; 31 Stat. 852; 42 U.S.C. §§ 4321-4327) requires that important natural aspects of the nation's heritage be considered in assessing the environmental consequences of any proposed project. The FLPMA (P.L. 94-579; 90 Stat. 2743; U.S.C. § 1701-1782) requires that public lands be managed in a manner that protects the quality of their scientific values. The most explicit protection for paleontological resources was enacted in 2009. The Paleontological Resources Preservation Act of 2009 regulates who may collect fossils on public lands and where such fossils must be curated.	The Paleontological Resources Protection Act was passed as part of Public Law 111-011, Title VI, Subtitle D. Currently, no agencies have promulgated regulations for this legislation, which makes the law difficult to enforce

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.13.2.2	12	PALEO-1	The Proponents shall prepare a Paleontological Monitoring Plan for the Project, focusing on Segments 4, 7, 8, and 9 where the potential for adverse impacts is the greatest. This plan shall be submitted to appropriate agencies for review and approval prior to commencing construction. The plan will specify that: • Monitoring of excavation and grading in sensitive sediments, especially access roads and tower sites, must occur when construction is near or in those geologic formations. • Monitoring of excavations in sensitive sediments, screening the excavated spoils, and processing of bulk sediment samples for microvertebrate fossils must occur where there is a significant potential for data recovery from those spoils. • Monitoring must be performed by a qualified paleontologist and in consultation with a designated paleontologist in each state, NF, or BLM district. The Authorized Officer will designate the appropriate paleontologist depending on project location.	The Draft EIS needs to be revised to provide more specific and enforceable criteria for when monitoring should occur. The terms "significant potential for data recovery of these spoils" is vague and can mean different things to different readers. Additionally, what constitutes sensitive soils should be clearly defined (class 4 or 5, etc).
	3.13.2.2	12	PALEO-1	The Proponents shall prepare a Paleontological Monitoring Plan for the Project, focusing on Segments 4, 7, 8, and 9 where the potential for adverse impacts is the greatest. This plan shall be submitted to appropriate agencies for review and approval prior to commencing construction. The plan will specify that: • Monitoring of excavation and grading in sensitive sediments, especially access roads and tower sites, must occur when construction is near or in those geologic formations. • Monitoring of excavations in sensitive sediments, screening the excavated spoils, and processing of bulk sediment samples for microvertebrate fossils must occur where there is a significant potential for data recovery from those spoils. • Monitoring must be performed by a qualified paleontologist and in consultation with a designated paleontologist in each state, NF, or BLM district. The Authorized Officer will designate the appropriate paleontologist depending on project location.	The Draft EIS should be revised to require that the proponent survey in Class 3, 4 and 5 areas to eliminate or more readily identify areas that would require monitoring instead of automatically requiring monitoring in all those areas. The Draft EIS also needs to be revised to specifically disclose how much sediment constitutes a "bulk sediment sample, as well as disclosing why screening is necessary if you are already taking a bulk sample.
	3.13.2.2	12	PALEO-3	Areas with Fossil Potential Classification sensitivity rankings of 3, 4, or 5 on NFS lands will be surveyed and posted.	"PALEO-3 Areas with Fossil Potential Classification sensitivity rankings of 3, 4, or 5 on NFS lands will be surveyed and posted." The required monitoring should be sufficient. If there are surveys conducted, it diminishes the need for active monitoring.
Geologic Hazards	3.14				
	3.14.1.4	4	4	The damage to structures caused by earthquakes is highly variable and based on many features including, but not limited to, types of building materials and quality of construction, distance from epicenter, earthquake magnitude, and the susceptibility to ground shaking of underlying soil and rock at the site of the structure. Therefore, any relationship between structure damage and distance from earthquake epicenter is only an estimate. However, certain areas are subject to more earthquakes than others and the geographic distribution of earthquakes was considered.	All utilities governed by the National Electric Safety Code are required to apply various weather-related structural loading cases while designing transmission lines. We do apply all those required as well as some additional cases we feel are important to the integrity of the lines. A short note in section 250.A.4 indicates that by following the required loading cases, nothing further is required to resist earthquake loads. It states, “The structural capacity provided by meeting the loading and strength requirements of Sections 25 (Loadings for Grades B and C) and 26 (Strength Requirements) provides sufficient capability to resist earthquake ground motions.” For this reason we do not perform any additional design efforts specific to earthquakes.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.14.2.3	19	2	Segment 1W is composed of two parts, Segment 1W(a) and 1W(c), both of which would consist of a new 230-kV line for part of their length and a reconstruction of an existing 230-kV line for the remaining part. Segment 1W(a) would be about 76.5 miles long, and would extend from the Windstar Substation to the Aeolus Substation. Segment 1W(c) would be about 70.6 miles long, and would extend from the Dave Johnston Power Plant to the Aeolus Substation. Alternative 1W-A is a 16.2-mile alternative located near the town of Glenrock, which was the Proponents' initial proposal before moving the Proposed Route at the suggestion of local landowners in order to avoid the more settled area around Glenrock. Twenty acres of the proposed expansion at the Windstar and Aeolus Substations are attributed to Segment 1W(a) and 3 acres of the expansion at the Heward Substation and 17 acres of the expansion at the Windstar and Aeolus Substations are attributed to Segment 1W(c). There are no Route Alternatives proposed south of that point (see Appendix A, Figure A-2).	Segment 1W: Modify earthquake sentence per above.
Soils	3.15				
	3.15.2.2	13	2	Project construction activities that would affect soils include clearing, grubbing, and grading along the ROW and at additional temporary workspaces; trenching; backfilling; excavating; and construction of permanent structures, such as transmission line towers, access and service roads, co-generation sites, and substations. The total Project construction disturbance area consists of approximately 16,000 acres, which is approximately one percent of the Analysis Area. The construction disturbance area was calculated by establishing an assumed construction disturbance area around all Project features, such as transmission line towers, regeneration sites, substations, staging areas, laydown yards, and access roads. This predicted area was entered into a GIS database and compared to the areas of the various soil factors used for the soils analyses using the methods described in Section 3.15.1.4. The estimated soil effects within the construction disturbance area are presented in Table D.15-1 in Appendix D. Ground clearing during construction would increase the potential for erosion. Certain soils within the Project area would be more sensitive to soil impacts, including soils with a low soil loss tolerance, and soils qualifying as prime farmland. Removal of protective vegetation would expose soil to potential wind and water erosion. The construction acreage is larger than the operations area due to the need for tower erection areas at each structure, laydown yards, staging areas, and tensioning sites. The areas used only for construction would be reclaimed as soon as possible, which may include re-grading to original land contours, topsoil replacement, and revegetation.	The Draft EIS should be revised to disclose that service roads used for construction and operations would also be reclaimed to minimize erosion potential.
	3.15.2.2	13	4	Prior to construction, wetland delineations would be necessary in areas crossing or adjacent to assumed wetlands. At that time, the amount of hydric soils/wetlands would be re-evaluated and measures would be implemented to preserve or reclaim those acreages during construction and operation. The procedures presented in the Reclamation Plan (Appendix C-2), EPMs included in Appendix C-1, and the mitigation measures contained in Section 3.9 – Wetlands and Riparian Areas would be used to minimize effects to hydric soils and wetlands. FSH 2509.22, Soil and Water Conservation Practices, contains mitigation measures for hydric soils to be used on NFS land.	"FSH 2509.22, Soil and Water Conservation Practices, contains mitigation measures for hydric soils to be used on NFS land." The Draft EIS should be revised to specifically describe the required mitigation measures from the referenced document. Additionally, we recommend the Draft EIS be revised to specifically describe those measures required by the U.S. Forest Service, the BLM, and the Proponent to allow a direct comparison of respective mitigation measures and their effectiveness.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.15.2.2	17	SOIL-5	Disturbed soil will not be allowed to support the growth of noxious weeds, or invasive weedy species. Prevention of noxious weeds will apply to all phases of the Project.	This condition is too broad for effective implementation and is essentially meaningless and we recommend that it be deleted from the Draft EIS. The reclamation plan and other weed management measures will be implemented to minimize the spread of noxious weeds.
	3.15.2.2	17	SOIL-7	The Proponents are responsible for monitoring to ensure soil protection is achieved and providing monitoring reports on reseeding success or other methods to stabilize soils to the Forest Service by the end of each growing season for areas on NFS lands.	The Draft EIS needs to be revised to specifically disclose of criteria and/or a timeframe for the monitoring of reseeded areas.
	3.15.2.2	17	SOIL-8	Reclamation of all temporary disturbances on NFS lands (such as road cuts) should include replacement of material to original contours. Recompaction to pre-existing compaction percentage (which should be identified before disturbance) should be included in the plan. Guidelines for streambank re-compaction to maximize vegetative regrowth and mechanical stability are covered in USACE publication ERDC TNEMRRP-SR-26 (Goldsmith et al. 2001).	The Draft EIS should be revised to include similar language as in AGRI-12 with regards to reclamation. This would include the requirement that compaction would be tested in areas identified as a concern during reclamation activities.
Water Resources	3.16				
	3.16.1.3	6	5	WDEQ maintains similar water quality standards (Water Quality Rules and Regulations, Chapter 1) that also contain priority and non-priority pollutants, and water quality standards for Wyoming surface water.	The Draft EIS should be revised to provide the complete citation for the referenced standards.
	3.16.1.4	7	3	In order to identify water resources within the Analysis Area, estimates of stream flow along the transmission line were made using USGS regression models created using data gathered from established stream gages.	The Draft EIS should be revised to provide a complete citation for the model(s) and specific stream gages that were used. Were the models calibrated and validated for this Project? If yes, please provide the information. If no, please explain why the BLM did not feel this was necessary.
	3.16.1.4	7	4	After the estimated flows were calculated for the terminal stream order within each HUC, determinations were made on the likelihood of encountering active flow at proposed crossings within that HUC.	The Draft EIS should include a description of the time of the year when flow estimates were calculated and should include a description of the seasonal and annual flow fluctuations.
	3.16.1.4	11	3	For TMDL and 303(d) listed temperature-impaired streams, the effects from removal of shading vegetation on temperature degradation were analyzed. ...Acres of woody vegetation removed within 500 feet of the temperature impaired stream were calculated. The 500-foot distance was selected to be consistent with RMP buffers used to protect water quality.	The Draft EIS needs to be revised to provide citations that support that vegetation removal 500-feet from the edge of a waterbody will adversely affect water temperatures.
	3.16.1.4	12	2	Shallow bedrock within the Project area could require the use of blasting to set Project foundations. Blasting in shallow bedrock is more fully described in Section 3.14 – Geologic Hazards. Blasting in shallow bedrock could damage nearby structures, including wells. Wells within 200 feet of the blasting areas could be especially susceptible to damage. To assess the number of water wells within 200 of the blasting zones, the GIS file of the Analysis Area was overlaid on the GIS file from the Idaho and Wyoming water entities. The number of total wells within 200 feet of the Project centerline was determined by segment. To compare the number of wells within 200 feet of centerline between the Proposed Route and Route Alternatives, the number of total wells within 200 feet of centerline was counted by alternative	The Draft EIS needs to be revised as follows: "To assess the number of water wells within 200 of the blasting zones, the GIS file of the Analysis Area was overlaid on the GIS file from the Idaho and Wyoming water entities." Should read "To assess the number of water wells within 200 *feet* of the blasting zones, the GIS file of the Analysis Area was overlaid on the GIS file from the Idaho and Wyoming water entities."
	3.16.2.2	18	5	In addition, the Agencies have identified BIO-3 (in Section 3.6 – Vegetation Communities), which requires that access roads be constructed and sited in such a way as to minimize the number of trees that would need to be removed.	This requirement may not be practicable or feasible given the other mitigation measures and requirements of the agencies to avoid numerous sensitive resources (e.g., plant and wildlife species, viewsheds, cultural resources, etc.). Moreover, the Proponents have avoided sensitive resources as much as possible during routing. Accordingly, we recommend this requirement be removed from the Draft EIS.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.16.2.2	18	last	The Proponents would conduct construction and decommissioning of culverts under a CGP required for stormwater operations ...	Generally, Construction General Permits are only required for disturbances of one acre or more. If an individual culvert is decommissioned, then it is not likely that a Construction General Permit would be required.
Land Use & Recreation	3.17				
	3.17.2.2	50	1	For reliability reasons, the Proponents have proposed to site the facilities an average of 1,500 feet from existing transmission lines 230 kV or higher (see Section 1.3.3.3 of Chapter 1). During final design the separation distance could be greater if the distance between the tower of the existing line is greater than 1,500 feet. ROWs typically are wide enough only to accommodate the existing facility safely, and none of the Proposed Route and Route Alternatives would occupy any existing 230-kV or higher utility transmission ROW except as they approach substations. An exception is the 5.3-mile long Alternative 5E proposed by Power County, which would be located adjacent to an existing 345-kV line and would, therefore, not be consistent with the 1,500-foot separation criteria established for the Project	"For reliability reasons, the Proponents have proposed to site the facilities an average of 1,500 feet from existing transmission lines 230 kV or higher (see Section 1.3.3.3 of Chapter 1). During final design the separation distance could be greater if the distance between the tower of the existing line is greater than 1,500 feet." Separation is based on set criteria. Accordingly we recommend the Draft EIS be revised to the first sentence is as follow: "For reliability and public safety reasons and based on regulatory guidance, the minimum separation for preliminary siting of the line adjacent to existing lines is 1,500 feet." To more accurately portray the rationale behind greater separation distances correctly we also suggest the second sentence be revised as follows: "During final design, the separation distance could be greater as separation criteria includes the length of the longest span."
	3.17.2.2	54	1	The easement would also specify that the ROW be kept clear of trees and buildings or structures, and prohibit storage of flammable material of any kind within the boundaries of the ROW or bringing equipment or vehicles to the ROW that would exceed 14 feet in height. The ROW may be used for roads, agricultural crops, other purposes not inconsistent with the above limitations, and special circumstances in mining and agricultural areas where necessary to maintain existing practices, as negotiated with the landowner.	Height limit should state 12 feet.
	3.17.2.2	54	2	In some locations, the presence of a 230- or 500-kV transmission line ROW could be considered a corridor.	The Draft EIS should be revised to provide specific locations of these locations and why they, in particular would be considered a corridor.
	3.17.2.2	57	LU-1	"LU-1 To assist agency and county law enforcement in minimizing unauthorized OHV use on public and private lands, monitor OHV use and post signs along access roads where OHV activity has increased ..."	The Draft EIS should be revised to eliminate the requirement that the Proponent monitor OHV use. This is a difficult and time-consuming task that we do not have the personnel to implement effectively.
	3.21.1.4	12	3	In the Gateway West study area, wet environments may include dairy barns or feedlots. Stray voltage issues may occur when an animal makes contact with a metal object that is at a different potential from another point in contact with the animal (i.e., the nearby ground or earth potential). This may occur when there is poor grounding or bonding of the metal object to the earth and the electrical ground. For example, faulty or improperly wired motorized appliances, portable electric heaters, and fluorescent lights can lead to stray voltage issues. Metallic fences or large metallic object that are adjacent to, run parallel, or pass under the proposed Gateway West transmission lines may develop a different potential than the surrounding ground if not properly grounded; however, this is easily resolved by grounding the object.	Delete this paragraph because, as stated in the first paragraph on stray voltage, stray voltage is a distribution phenomenon and does not pertain to transmission lines. It is fine to maintain the first and third paragraphs of this section.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.21.2.2	37	1	Stray Voltage – Stray voltage or current is a problem whereby currents or potentials on conductive objects and metal work can come in contact and flow through humans or animals. Stray voltage is often a concern involving the farm electrical system and the local utility distribution system where a potential is developed on the grounded neutral system of the farm or utility. If an animal or human comes in contact with metal equipment that is at a different potential than the ground on which they are standing, a current may flow through the animal, or person, to ground and the potential be detected. Usually if this potential difference exists, it is too small to generate any physical or behavioral changes. In the case of nearby transmission lines, fences or piping that pass under or near the transmission line and connect back to a farm can be the source of currents and potentials on the farm. Stray voltage may be the result of corrosion or broken ground connections. Good grounding practices would reduce or eliminate this concern. The Proponents maintain programs for on-site investigation of stray voltage concerns.	The summary should be specific that stray voltage is a distribution problem and this transmission project will not impact the local distribution systems or create a change in the occurrence of stray voltage.
	3.21.2.2	General		General Comment	The Draft EIS needs to be revised to disclose that the Proponent may have to ignore restrictions in the case of emergency that requires immediate repair. In those cases, public health and safety will receive first priority.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Chapter 4 - Cumulative Effects	4				
Basis for Assessment					
	Entire Section			All	Overall the section does an excellent job listing the reasonably-foreseeable future actions, referring to the Affected Environment sections for details on the cumulative impacts of past actions, and providing rationale for the cumulative impacts analysis areas for each discipline. The section does need to improve its quantification of those impacts to take advantage of all the excellent preliminary work done in this section. We recommend the Draft EIS be revised to address this.
	4.1.2	3	Table 4.1-1	Known locations of eagle nests and suitable winter roosting habitat within 10 miles of the DICIAA.	Bald Eagle: 10 miles seems excessive for a cumulative impacts analysis area for eagles. Doesn't the FWS use a 6 mile buffer for golden eagles? A reference for the 10 mile buffer similar to what has been done for greater sage grouse would be helpful.
	4.1.2	4	1	For the purposes of this analysis, the temporal extent of the projects to be considered is the expected physical operational service life of this Project (50 years), plus the estimated 10 years needed for substantial site rehabilitation after decommissioning is completed.	There needs to be more description regarding the life of the project stating that although 50 years is chosen for purposes of analysis, that this line may be in service much longer so that the reader understands it may not be decommissioned after 50 years. The Draft EIS needs to be revised to address this.
	4.1.2	5	Table 4.1-1	Table	Greater Sage grouse: it is confusing why the Draft EIS uses multiple cumulative impacts analysis areas for sage grouse. It is not clear what the value of doing this is for assessing cumulative impacts. The Draft EIS should be revised to use the most appropriate distance to capture cumulative impacts, provide that rationale, and use that area to assess cumulative effects.
	4.1.3	8	1	In several cases, the Proposed Route or Route Alternatives would be incompatible with land allocation classifications (frequently but not exclusively VRM classifications) assigned to the federal lands they would cross. Chapter 2 summarizes all plan amendments, Appendix F-1 contains details and analysis of each proposed amendment to BLM land management plans, Appendix F-2 contains details and analysis of each proposed amendment to Forest Service land management plans, and Appendix G contains maps and visual analysis documentation, including photographs and simulations, in support of the amendments analyses.	The Draft EIS should be revised to reword the first sentence to say that the Proposed Action and alternatives would require land use plan amendments instead of saying they would be “incompatible” with existing land use plans.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.1.3	8	2	In most cases, the amendments to the land management plans are designed to allow the Project to be constructed and operated without changing the underlying land allocations. Where that is the case, there are no cumulative effects of the plan amendment that are not fully captured in the cumulative effects of the Project itself. Those amendments are considered in detail by resource, below, but not addressed further in this section. Where that is not the case, the resultant plan amendment could have cumulative effects in addition to the cumulative effects of the proposed Project itself. For land use plan amendments, in addition to considering the cumulative effects of the Project itself, the impact of the underlying land use allocation revision is analyzed in this section across the extent of the polygon proposed for revision. For example, if a polygon mapped as VRM Class II is proposed to be changed to VRM Class III, the impact of that change is taken into consideration as part of the cumulative effects.	The assumption that the land use plan allocation is a cumulative effect is flawed. Changes in the land use plan allocation are required specifically for this project to occur and are therefore "connected actions" to the project, not "cumulative actions". As such, the impacts of these land use plan amendments should be disclosed as direct effects of this project and should be assessed as using appropriate broad programmatic analysis indicating the consequences of the change in management of this land (in contrast to vague references to future projects that could occur there because of the change). Secondly, the cumulative effects section should describe the impacts of site-specific impacts of "reasonably-foreseeable future actions" on the same resources that this project affects. The term "reasonably-foreseeable" implies those actions are either planned or proposed not future actions that may or may not occur as a result of a land use allocation change. Such speculation is not appropriate for cumulative impacts analysis. All such direct/indirect effects described as "cumulative effects" in Section 4.1.3 for land use plan amendments should be moved to the appropriate direct/indirect impacts sections of the Draft EIS and the impacts of the land use plan amendments should be revised to provide appropriate broad scale programmatic analysis of the impacts of changing the land use designation/allocation. The Draft EIS needs to be revised to incorporate these changes.
	4.1.3.5	11	last	Changes in the VRM designation and the possible designation of a utility corridor along either Alternative 4B or 4D, if they are chosen and constructed, would have the effect of encouraging further transmission development to be sited in this corridor. Two proposed transmission lines, a 500-kV DC (TransCanada's Zephyr line) and a 500-kV DC or AC line (Jade Energy's Overland Intertie) were originally proposed to follow the Gateway West alignment. Both projects are on hold as of June 2011. If either moves forward in the future, they would likely be built along this alignment and in the designated utility corridor if this Project were approved and constructed in this location. The change in designation would not affect currently authorized coal mining taking place in the area. No other reasonably foreseeable projects would be located within the area proposed for VRM amendment. Therefore, the impact of the change would largely be to encourage future transmission development, if any, to follow the Gateway West alignment through the Kemmerer FO. Cumulative impact of additional transmission line construction is analyzed by resource in Section 4.4, below.	If these two projects were put on hold then they would not be considered reasonably-foreseeable. Additional explanation is necessary to indicate why they are still seen as reasonably-foreseeable

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.1.3.7	12	last	Segment 5 would also cross a VRM II parcel adjacent to the Snake River. If it is selected, the VRM Class II designation for the 35-acre parcel containing the pipeline recreation site (3 miles southwest of American Falls on the Snake River) would be changed to VRM Class IV (AOI M-2). A pipeline crossing of the Snake River is visible from that campground now. Reasonably foreseeable projects proposed include two proposed transmission lines, a 500-kV DC (TransCanada's Zephyr line) and a 500-kV DC or 500-kV AC line (Jade Energy's Overland Intertie), which were originally proposed to follow the Gateway West alignment. Both projects are on hold as of June 2011. If either moves forward in the future, they would likely be built along the approved Project alignment. The 35-acre designation change to VRM Class IV would not affect the approval process for these lines, because they would each need one or more land use plan amendments to be approved. Therefore, the cumulative impacts of the plan amendment that changes the VRM classification of the 35-acre parcel would be essentially identical to the cumulative effects of the Project itself	The statement "Therefore, the cumulative impacts of the plan amendment that changes the VRM classification of the 35-acre parcel would be essentially identical to the cumulative effects of the Project itself" illustrates how this section confuses the cumulative impacts analysis. What this statement is referring to are the direct and indirect impacts of the project. Cumulative impacts are the incremental addition of project direct and indirect impacts onto the impacts of past, present, and reasonably-foreseeable future actions not associated with the project but affecting the same resources. The Draft EIS needs to be revised to address this.
Projects or Actions w/Potential for Cum Effects					
	4.2.1.4	27	Table 4.2-4	Table	The Draft EIS needs to be revised to include FMC Green River and Pocatello in this table.
	4.2.1.4	34	1st after table	Solar power generation is the process of converting solar energy into electricity. Multiple methods are used at existing solar facilities to convert solar energy to electricity, including photovoltaics (using semiconductors that exhibit the photovoltaic effect) and concentrated solar thermal (focusing solar energy to produce steam). Most utility-scale solar facilities in the U.S. are located in the southern portion of the country where solar light is more intense and the light regime is more predictable. Solar facilities have low impacts on air quality compared to conventional fossil fuel-power plants; however, due to the large area of ground disturbance associated with utility-scale solar facilities, they contribute to habitat loss and fragmentation. In addition, there is some concern regarding the impact that these facilities could have on avian species (due to burns or collisions with project mirrors); however, very little post-construction data are available regarding this potential effect. There are no existing solar facilities in Idaho or Wyoming.	Existing Solar facilities: If there are no existing solar facilities in the area, why are does the DEIS describe potential impacts of those facilities? This sub-section should be revised or deleted from the Draft EIS.
	4.2.2.5	46	last	In 2010, ICF International published a report conducted for the Wyoming Infrastructure Authority called the Wyoming Collector and Transmission System Conceptual Design (ICF 2010a). This report considered two wind resource development scenarios—one that included wind resources west of the Laramie Range, and one that included wind resources primarily on the east side of the Laramie Range. The intent was to provide a conceptual design for up to 12 gigawatts (GW) of renewable capacity. The report concluded that it was conceptually feasible to provide for this capacity under both resource scenarios...	Transmission for Proposed Wind Energy Facilities: This section does not appear to describe reasonably foreseeable future actions that are proposed. Implementation of any of this transmission appears speculative at this time and should not be considered under cumulative impacts as per earlier comments stating that reasonably foreseeable actions were those that were actively proposed or previously proposed and not withdrawn.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.2.2.5	48	last	Wind projects are still in development in Wyoming, but many appear to be on hold (see Table 4.2-15, above). According to AWEA, an industry association, there are 1,412 MW of installed capacity in Wyoming, of which 310 MW were added in 20106. Several projects were located in areas with good wind resources but also in areas listed by the State of Wyoming as Core Habitat for sage-grouse, where the Governor of Wyoming has stated (EO 2011-5) that wind development is inappropriate7. It is therefore not clear how much wind energy will be developed in Wyoming, or where that development will occur...	Backup Energy for Firming Intermittency in Wind Generation: Same comment as above; this section does not describe any reasonably foreseeable future actions and should be deleted.
	4.2.2.5	50	Table 4.2-16	Table	All six pumping projects referred to at the start of the section should be included in this table for clarity. The Draft EIS should be revised to address this.
	4.2.2.5	51	2	Biomass feasibility studies are currently being conducted in the western states (including Idaho and Wyoming), and multiple biomass and cogeneration projects are currently being considered. However, at this time, formally proposed projects are limited due to current economic feasibility. No projects have been formally proposed in Wyoming; however, eight projects have been proposed in Idaho, with estimated power production ranging from 1.2 to 13 MW. Only two projects are currently proposed that would generate at least 10 MW of energy: the Adams County Electrical Biomass Facility that would generate 10 to 13 MW of energy, and the Yellowstone Tower Combined Heat and Power Plant that would generate 10 MW of energy (Crockett 2010; Huffman 2010).	Proposed Biomass and Cogeneration Facilities: the proposed footprint (acreage) of the biomass/cogen facilities should be provided to set the stage for impacts analysis. The Draft EIS should be revised to address this.
	4.2.2.6	Entire section		There are many thousands of acres of oil and gas leases that have not yet been fully developed. Oil and gas exploration, extraction, and development are likely to continue throughout the life of Gateway West. The intensity of development and the degree to which less productive fields are exploited are dependent on the international and domestic market for petroleum products as well as any government incentives (e.g., depletion allowance) or disincentives (e.g., carbon tax). Although the leases are in place and development could technically take place at any time, the market drivers to exploit them are unknown now. Therefore, it is not possible to quantify the additional amount of environmental impact due to future oil and gas development. The existence of a robust electric grid will continue to support oil and gas extraction by providing the power for the extraction pumps. The Creston Substation is proposed in part to serve a future load from oil and gas extraction both north and south of the proposed Gateway West transmission line in the areas of Segments 2 and 3...	This section does not discuss reasonably foreseeable future development at a level to allow for cumulative impacts analysis. It is possible that RFDs for these types of development could be taken from existing RMPs to provide a robust cumulative impacts analysis. The Draft EIS should be revised to address this.
	4.2.2.8	Entire section		It is reasonable to expect that the Forest Service and the BLM will continue their programs of vegetation management for fire control, salvage timber harvest, and road maintenance and decommissioning. However, no site-specific information on activities scheduled more than 2 years in the future was either found on the SOPA for the Medicine Bow-Routt, Caribou-Targhee, or Sawtooth NFs or available for the Kemmerer or Pocatello FOs.	The Draft EIS should be revised to delete this statement, it provides no actual reasonably foreseeable future actions.
Activities & Potential Shared Resource Impacts	4.3				

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.3	53	Table 4.3-1	Table	This table would be more informative to the reader if it included a column with overall disturbance acreages for each broad category of action. A footnote referencing the qualitative descriptions for each resource in the table would allow the reader to easily see both the detailed qualitative descriptions of cumulative impacts and the quantification of those impacts. The Draft EIS should be revised to address this.
Cumulative Impact Analysis	4.4				
	4.4.3	55-59	Entire section	The 10-mile-wide CIAA for visual resources includes a variety of landscapes such as mountainous areas, broad agricultural valleys, expanses of shrub steppe that have been or are still used for livestock grazing, areas of intensive mining, coal and gas development extraction and, for most of the Proposed Route and Route Alternatives, one or more existing transmission lines that occur within a half mile. Section 3.2 – Visual Resources discusses the direct and indirect effects of the Proposed Route and Route Alternatives on visual resources. The Proposed Route was designed to take advantage of existing utility corridors to minimize the introduction of a new transmission facility into a previously undisturbed landscape and reduce the visual impact on the landscape. Segment 9 is the longest exception to this general rule and the Proposed Route crosses areas without other major existing transmission lines for most of the its length. Segment 1E also crosses landscapes without existing high-voltage transmission lines for 88 miles. However, even with careful siting and the implementation of additional mitigation measures required or recommended by the Agencies, the Proposed Route and Route Alternatives are expected to have a substantial adverse visual impact on the landscape in certain locations...	This section does not include an assessment of the visual impacts when considered with existing VRM and development so it doesn't have a substantive basis for saying impacts would be "substantial". While this section includes a good qualitative description, its lack of quantification needs to be improved (e.g. it could quantify acres of disturbance and miles of power line within visually sensitive areas for example). The Draft EIS should be revised to address this.
	4.4.4	59-60	Entire section	In some areas, the construction of the Gateway West transmission line could lead to the establishment of a corridor in which other lines may be installed in the future. There is a potential that cumulative impacts to the visual settings for some cultural resources would occur due to the establishment of a corridor and the subsequent construction of additional transmission lines....	This section should quantify total cumulative disturbance, particularly in areas where there is a high likelihood of finding cultural resources. Again, this section lacks quantification and at a minimum it should provide cumulative acres of disturbance. See comment above regarding Table 4.3-1. The Draft EIS should be revised to address this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.4.5	60-62	Entire section	that could combine with the Gateway West Project and result in cumulative effects to the socioeconomic environment include projects with the potential to affect population, the economy and employment, housing, property values, education, public services, and tax revenues. The effects from past and present activities are generally accounted for in the baseline socioeconomic environment characterized in Section 3.4.1. These past and present activities generally include construction and operation of existing transmission line and other linear projects, development and operation of energy generation projects, past and present oil and gas operations, and other residential and commercial development (see Section 4.2.1). Ongoing and reasonably foreseeable projects with the greatest potential to combine with the proposed Gateway West Project and result in cumulative impacts include 1) current construction projects that would continue through 2011 and beyond, or 2) reasonably foreseeable actions that would be in construction between September 2011 and December 2018, when the majority of construction activities would occur on Gateway West. Cumulative effects on socioeconomic resources do not differ substantially by alternative....	This section could make an estimate of cumulative numbers of new workers and revenues from reasonably-foreseeable future projects to better quantify cumulative socioeconomic impacts on housing, infrastructure, and tax revenues. As it is now, there is not a basis for saying there would be housing shortages for example. Also, if the DEIS can do a general estimate for the project's tax revenues, then it should be estimating roughly the revenues for reasonably-foreseeable future actions. The Draft EIS should be revised to incorporate these suggestions.
	4.4.6	62	Entire section	Data compiled by the U.S. Census at the block group level indicate the potential presence of minority and low income communities in the vicinity of the Project. The Project is not expected to generate high or adverse human health or environmental effects on nearby communities. The Project would, however, have high, long-term visual impacts in some locations where the structures and overhead conductors would be visible from private residences, including parts of the Census Block Groups that have potential minority and low income communities. While these potential impacts exist, overall, the proposed Project does not appear to exhibit systematic bias toward placing the Project in minority or low income communities (see Section 3.5 – Environmental Justice). Cumulative effects on visual resources are discussed above in Section 4.4.3. Local construction expenditures for materials and supplies and spending by workers directly employed by the Project are expected to benefit local economies.	This section does not address cumulative impacts to environmental justice communities which would be appropriate if there were none from this project. The Draft EIS should provide the rationale for this assessment such that it does not show “systematic bias” towards low income or minority communities and therefore does not have disproportionate impacts on these communities. The Draft EIS should be revised to address this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.4.7 - 4.4.12	63-84	Entire sections	The major ecological changes to vegetation that have occurred, and that continue to occur, in the CIAA due to past and present actions include changes in vegetation composition and conditions due to fire, grazing, mining, oil and gas development, agriculture, infrastructure development, and other forms of development. Of particular concern is the continuing degradation of shrub-steppe habitat, primarily due to increased abundance and dominance of non-native species. Planned activities, including construction of infrastructure, mining, and expansion of residential development, would contribute to this overall loss of native vegetation, increase habitat for noxious weeds, and result in the potential loss of rare plant occurrences and habitat (see Sections 3.7 and 3.8 discussion). Grazing, which is prevalent along Gateway West in Wyoming and parts of Idaho, may also affect vegetation by increasing habitat and distribution of noxious weeds and other non-native plants and by causing shifts in native species composition because of differential selection of food plants. These processes will continue into the foreseeable future....	These sections should provide the acreage of cumulative disturbance to these habitats and vegetation cover types. As it is now, there is no basis for the many claims of "substantial" cumulative impacts. In most cases these sections just reiterate the numbers from the Proposed Action without disclosing the cumulative disturbance of all the other reasonably-foreseeable future projects. Additionally, the analysis also doesn't match the point of establishing the cumulative impacts analysis areas defined at the start of this section. Without quantification, those analysis areas (particularly for wildlife) are of minimal value.
	4.4.14	85	Entire section	There are several concentrations of known fossil-bearing formations close to or at the surface in the CIAA for Gateway West. Based on the indices reported in Section 3.13, which discusses paleontological resources for the Project, the most sensitive of these areas are found along Alternative Routes 4B through 4E, near Fossil Butte National Monument, and near Alternatives 8A and 9A, which pass near to the boundary of Hagerman Fossil Beds National Monument. In the area of high fossil sensitivity, the additional ground-disturbing activities with potential to degrade fossil-bearing formations include the two proposed transmission lines, Zephyr and Overland Intertie; no other projects are proposed in this area. These projects have the potential to uncover fossils of potential scientific importance. However, the relatively small footprint of the several projects when compared with the large extent of the fossil-bearing formations indicates that the cumulative impact of Gateway West would be minor.	This analysis should at a minimum disclose the cumulative total of potential disturbance in formations with a high likelihood of encountering vertebrate fossils. Right now it doesn't quantify cumulative impacts to paleontological resources. The Draft EIS should be revised to address this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.4.15	85-86	Entire section	Some of the Projects listed in Section 4.3 have the potential to create geologic hazards (e.g., mining activities creating subsistence, leaving unstable walls, and sinkholes). In addition, multiple crossings of earthquake zones and areas of high landslide potential by various proposed transmission lines could contribute to the possibility of catastrophic failure of several lines at once. The Proposed Route and all Route Alternatives for Segments 4, 5, and 7 would cross areas of high earthquake risk (see Section 3.14 – Geologic Hazards, for details). Project structures could be damaged or collapse in the event of fault rupture beneath or adjacent to a tower due to inaccurate fault location during project design. Collapse of Project structures would potentially result in power outages, damage to nearby roads or structures, and injury or death to people. In addition to Gateway West, three existing 345-kV transmission lines and the proposed Overland Intertie and Zephyr transmission line projects would cross high earthquake risk areas in Segments 4, 5, and 7, as well as crossing areas of high landslide potential in the western end of Segment 4. BLM would require proponents of all new transmission lines to conduct geotechnical exploration and avoid locating any project facilities on earthquake traces or in areas of active land movement. Prudent engineering design and compliance with national building standards would reduce the risk for each of the transmission lines to a minor level. Taken together, the risks to each line and to the existing 345-kV lines would raise the chances that at least one of them might fail in an earthquake or landslide event. However, the cumulative risk would still be low provided that standard engineering practices for design and construction, and the proposed operations and maintenance activities for Gateway West were also practiced by other proponents.	There is no quantification of reasonably-foreseeable disturbance acreages in high erodibility soils or areas of high geologic instability. The Draft EIS should be revised to address this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.4.16	86	Entire section	Effects on soils from Gateway West that would contribute cumulative effects include soil loss due to wind erosion, soil mixing, soil compaction, and soil contamination. Soils in the CIAA have been affected by past activities such as pipelines, transmission lines, roads, oil and gas development, OHV use, and grazing. During construction of any of the current or reasonably foreseeable projects, vegetation would be removed exposing the soil to erosional forces, soil compaction could occur from vehicle traffic, and soil excavation would cause soil mixing, although BMPs (minimizing bare soil exposed to wind, water, and steep slopes, and stockpiling topsoil for use during reclamation) are or would be used to minimize the extent of effects. Soil contamination could occur from chemical or petroleum spills, although the risk is not great. Soil disturbance will remain during the life of the projects. These effects are short-term, occurring during the construction period, as disturbed areas are required to be reclaimed. Loss of production due to sites occupied by facilities (transmission line structures energy generation facilities, commercial development, and the access roads to all of these) would remain during the life of the projects. Effects on soils could occur from unauthorized off-road vehicle use from construction on projects with inadequate access control. Decommissioning and reclamation can recover some of the soil productivity, but is not 100 percent effective. Large construction projects, mining, roads, and pipelines are the projects that have the most of these types of effects on soils. The implementation of BMPs and reclamation on all projects would minimize soil impacts. The cumulative impact of Gateway West, when taken together with the already substantial impact of past and present activities and proposed future action on some sensitive soils, could be substantial even with expected erosion control measures fully effective	There is no quantification of reasonably-foreseeable disturbance acreages in high erodibility soils or areas of high geologic instability. The Draft EIS should be revised to include this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.4.17	86-87	Entire section	The impacts to surface waters from the Gateway West Project include potential for sedimentation and temperature increases due to road crossing construction and ROW clearing. These impacts would be minimized but not entirely eliminated by the conditions of the SWPPP and additional mitigation measures. It is reasonable to assume that other construction projects would also minimize but not eliminate their impact. However, when taken together with the substantial degradation to surface water resources from grazing, fires, and invasive species, the additional minor impacts of Gateway West and other proposed projects would contribute to a substantial cumulatively impact. Construction of Gateway West and any other project could affect groundwater if an accidental chemical spill occurred near an open excavation for a foundation on any of the planned projects that occur in the same area of shallow groundwater found in Segments 4, 5, and 7. The risk is relatively small because these types of spills rarely occur and because the Proponents have committed to enforce the terms of their SPCC Plan. Water usage would also occur for most facility construction projects in the CIAA, mostly for dust control and mixing concrete for other transmission line facilities, energy generation facilities, commercial developments, and roads. This water usage is important because of federally listed threatened and endangered fish and plants in these watershed and the cumulative effects are discussed in Section 4.4.8. Because Gateway West would not require any water rights, there would be no cumulative effects on water right	The Draft EIS should include quantification of cumulative numbers of water crossings and/or cumulative disturbance in 100 year floodplains and/or within ¼ mile of perennial water bodies from reasonably-foreseeable future actions.
	4.4.18	87-92	Entire section	The WWE Corridor PEIS (DOE and BLM 2008) designates corridors on federal lands within 11 western states (Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming) for oil, gas, and hydrogen pipelines, as well as electricity transmission and distribution facilities. However, it does not take into account the current federal land use plans (such as the Forest Service Forest Plans or the BLM RMPs) that still exclude those uses along many parts of the corridor. As a result, the siting of these types of facilities within the WWE corridor may still require amendments to existing federal land management plans (Forest Plans, RMPs, and MFPs) that could change existing land use allocations for the affected lands. In addition, the Gateway West Project is only partially located within this designated corridor. The Gateway West Project would cumulatively add to the changes made to these federal land use plans by the past, present, and reasonably foreseeable future projects. The Route Alternatives (such as Alternatives1E-C and 7I) that cross more public lands or would impact more sensitive resources on federal lands would have a greater contribution to this cumulative effect on public land use plans than the Proposed Route....	The Draft EIS should include total acreage of land use changes or even land use category changes associated with amendments and reasonably-foreseeable future actions. The Draft EIS needs to be revised to address this.
	4.4.19	92-94	Entire section	Within the Agriculture CIAA, past, present, and reasonably foreseeable activities that could combine with the Gateway West Project and result in cumulative effects to agriculture include projects with the potential to affect prime farmland, livestock grazing, crop production, CRP lands, and dairy farms. The effects from past and present activities that have shaped current patterns of agricultural use are generally accounted for in the existing conditions overview presented in Section 3.18.1.5. The analysis area used for the direct and indirect effects analysis is the same area as the Agriculture CIAA...	The Draft EIS needs to disclose the quantification of total acreage of prime farm land impacted by reasonably-foreseeable future actions. This section restates the project impacts. The Draft EIS should be revised to address this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.4.20	94	Entire section	Linear facilities invariably need to cross other linear features such as highways and railroads. These crossings can interfere with use of the roads and railroads during project construction, sometimes including needing to reroute or delay traffic. However, these impacts would be temporary in nature and only last as long as construction activities occurred within the area. If other reasonably foreseeable projects are construction at the same time and location as the Gateway West Project, or immediately before or after this project, then there could be a minor temporary cumulative effect on traffic volumes on local roads, which would be mitigated by traffic controls required by both county and federal regulations. Cumulative impacts on transportation do not differ substantially by alternative, because the measures in place to protect the public during both construction and operations would apply both for Gateway West and other projects	Based upon the statements in this Draft EIS, this section shows the project has no impact on transportation and as such should be eliminated from the cumulative impacts analysis with the associated rationale for doing so. The Draft EIS should be revised to address this.
	4.4.21	95	1st-2nd	Total estimated CO2 equivalent emissions (total emissions of all greenhouse gases converted to equivalent of CO2) from construction of the Project is 232,268 tons over the construction period. Approximately 54 percent of these emissions or 125,425 tons CO2 equivalent is allocated to Wyoming, and 46 percent of these emissions, or 106,843 tons CO2 equivalent, is allocated to Idaho. On an annual basis, the project construction CO2 equivalent emissions for Wyoming and Idaho are 24,593 and 20,950 tons CO2 equivalent per year respectively. Predicted CO2 equivalent emissions for 2010 in each state are 66,330,000 tons CO2 equivalent for Wyoming, and 43,560,000 tons CO2 equivalent for Idaho (CCS 2007, 2008). The construction CO2 equivalent emissions from the Project represent approximately 0.037 percent of the annual total for Wyoming, and 0.048 percent of the annual total for Idaho. GHG emissions from operations activities would be on the order of less than 3 tons CO2 equivalent per year. Therefore, construction and operations of the Gateway West Project would not add substantially to the cumulative effects of past, present, and reasonably foreseeable future projects in terms of greenhouse gas emissions.	It is unclear if these emissions are the cumulative emissions from reasonably-foreseeable future actions or are the emissions from this project? Also, estimated potential emissions from the reasonably-foreseeable power projects described previously should be provided. The Draft EIS should be revised to incorporate these suggestions.
	4.4.22	95	Entire section	The analysis of electrical effects determined that the Gateway West Project would have no effects on health or safety; therefore, there would be no cumulative effects to other past, present, or reasonably foreseeable future projects. This is the case across all alternatives. Cumulative effects of noise due to corona effects are treated in Section 4.4.24.	It is unclear why the cumulative impacts analysis for electrical environment centers on health and safety. which is covered in the next section. This section should discuss the cumulative impacts of all the reasonably-foreseeable future actions and this project on electrical capacity, reliability, public needs, peak usage, etc. The Draft EIS should be revised to incorporate these suggestions.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	4.4.24	96	Entire section	Cumulative impacts due to construction noise could occur within 1,000 feet of the Project area or ancillary facilities as other projects or activities add to the noise from the time of Gateway West construction. In some cases, other construction projects could be using the same roads as Gateway West and additional construction-related traffic noise could occur, though it is very unlikely that these projects would be constructed concurrently. No substantial long-term changes in the volume of traffic and resulting potential transportation noise impacts are expected. Therefore, Gateway West would not contribute substantially to adverse cumulative noise impacts during construction. Operations noise from the Gateway West Project is limited to corona noise. Corona noise is not audible outside the ROW. Cumulative impacts on noise do not differ substantially by alternative because the measures in place to reduce noise of both construction and operations would apply both for Gateway West and other projects. With the exception of limited areas where the Gateway West Project crosses other transmission lines, there would be no cumulative effect when taken together with other transmission lines because of the separation distances and lack of sensitive receptors.	The Draft EIS should be revised to provide the quantification of cumulative impacts of construction noise of reasonably-foreseeable future actions within 1,000 feet of the sensitive receptors so that the Draft EIS discloses what is being impacted by the project during the same time period.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Appendix A					
	Figure A-2			Refer to figure	Show and label Dave Johnston substation location.
	Figure A-7			Refer to figure	Kinport substation is incorrectly shown as Ben Lomond substation
	Figure A-12			Refer to figure	Needs to depict route to Rogerson substation and comparison of alternate should be included in analysis.
	Figure A-2-A12			Refer to figure	Add ID labels for all eliminated routes to help readers locate them easily
	Figure A-2-A12			Refer to figure	Increase node ID labels so they are readable

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Appendix B - TL & SS Components					
Types of Transmission Line	1.1.1	B-1	2	In addition to the more typical tangent structure configurations, specialized structures are designed where the line must turn an angle. Each structure type is individually designed, depending on the line angle and the underlying soil and rock conditions, to withstand the pull of the wires in different directions. Angle structures are heavier and have deeper foundations. Figure B-7 illustrates structure types considered during preliminary Project design but not carried forward as proposed by the Proponents. Table 2.6-2 and Section 2.6.2, Chapter 2, provide a comparison with proposed structures and a rationale for the selection of the proposed structures.	The second paragraph should be separated into two paragraphs, starting with the sentence "Figure B-7 illustrates ...". This part of the paragraph is a new thought detailing what structures were considered but not carried forward. The first portion of this paragraph deals with angle and deadend structures that are being carried forward.
Types of Transmission Line	1.1.1	B-4	Fig. B-3		Add note "Detail of Conductor Bundle" to arrow in lower left portion of the figure (see similar note on Fig. B-2)
Types of Transmission Line	1.1.1	B-5	Fig. B-4		On the 230-kV Proposed Design sketch, revise 19'-6" to 21'-6" and move the dimension line for the 60'-90' height to the top of the shield wire. This sketch will then match Fig. B-1. Also, add a sketch for the single circuit 345-kV ROW.
Types of Transmission Line	1.1.1	B-8	New	N/A	Insert new figure of typical tangent 345kV structure
Types of Transmission Line	1.1.1	B-9	2nd		Add "Structure heights would vary depending on terrain and the requirement to maintain minimum conductor clearances from ground" after the sentence describing the average distance between 230-kV h-frame structures. This will make the discussion similar to that of the 500-kV structures in the next paragraph.
Types of Transmission Line	1.1.1	B-9	Table B-1	Footnote: 2/ Includes 230-kV and 345-kV interconnections with existing Jim Bridger Substation, which will be constructed using tubular steel single-circuit structures. Note that for estimating purposes, the larger disturbance footprint of the 500-kV double-circuit tower type was used. Actual disturbance will be less	Add 345kV row for segment 3A; could then delete footnote 2
Types of Transmission Line	1.1.1	B-9	Tbl B-1		Temporary and Permanent Disturbance Area: Remove "ROW width" because this is not the ROW width.
Types of Transmission Line	1.1.1	B-9	Tbl B-1		Revise title of last two columns to Temporary and Permanent Disturbance Area (matches the paragraph describing the table and the continuation of the table on page B-10).
Types of Transmission Line	1.1.3	B-10	1st		Change the second sentence to state "foundation diameter and depth ... are dependent on the structure type and type of soil ..."
Types of Transmission Line	1.1.3	B-10 and B-11	1st		Revise single-circuit tangent structure foundation depth from 15 to 22, double-circuit tangent structure diameter from 6 to 5 and depth from 20 to 26 (all to match Table B-2).
Types of Transmission Line	1.1.1	B-11	Table B-1	N/A	Add 345kV foundation row for segment 3A
Conductors	1.2	B-12	New	N/A	Add 345kV paragraph describing conductor
Conductors	1.2	B-12	3	Where multiple conductors are utilized in a bundle for each phase, the bundle spacing would be maintained through the use of conductor spacers at intermediate points along the conductor bundle between each structure. The spacers serve a dual purpose: in addition to maintaining the correct bundle configuration and spacing, the spacers are also designed to damp out wind-induced vibration in the conductors. The number of spacers required in each span between towers would be determined during the final design of the transmission line.	Correct paragraph. Vertical double bundle does not use spacers; just stockbridge dampers. The only place where spacers are required is in the last span into a substation where the bundle rolls from vertical to horizontal.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Insulators	1.3.1	B-12	1	As shown in Figure B-1, insulator assemblies for 230-kV H-frame tangent structures would consist of one insulator string hung vertically from the cross arm in the form of an "I." As shown in Figures B-2 and B-3, insulator assemblies for 500-kV tangent structures would consist of two strings of insulators normally in the form of a "V." These strings are used to suspend each conductor bundle (phase) from the structure, maintaining the appropriate electrical clearance between the conductors, the ground, and the structure. The V-shaped configuration of the 500-kV insulators also restrains the conductor so that it would not swing into the structure in high winds. Dead-end insulator assemblies for both 230-kV and 500-kV lines would use an I-shaped configuration, which consists of insulators connected horizontally from either a tower dead-end arm or a dead-end pole in the form of an "I." Insulators would be composed of grey porcelain or green-tinted toughened glass or single unit polymer (no ceramic insulators)	Add sentence discussing tangent 345kV insulator assembly configuration.
Insulators	1.3.1	B-12	1	As shown in Figure B-1, insulator assemblies for 230-kV H-frame tangent structures would consist of one insulator string hung vertically from the cross arm in the form of an "I." As shown in Figures B-2 and B-3, insulator assemblies for 500-kV tangent structures would consist of two strings of insulators normally in the form of a "V." These strings are used to suspend each conductor bundle (phase) from the structure, maintaining the appropriate electrical clearance between the conductors, the ground, and the structure. The V-shaped configuration of the 500-kV insulators also restrains the conductor so that it would not swing into the structure in high winds. Dead-end insulator assemblies for both 230-kV and 500-kV lines would use an I-shaped configuration, which consists of insulators connected horizontally from either a tower dead-end arm or a dead-end pole in the form of an "I." Insulators would be composed of grey porcelain or green-tinted toughened glass or single unit polymer (no ceramic insulators)	Add 345kV to "I-string" dead-end sentence
Insulators	1.3.1	B-12	1st		Change no to non in last sentence (in parentheses, non-ceramic insulators).

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Grounding Systems	1.3.2	B-13	2	The methods and equipment needed to mitigate these conditions would be determined through electrical studies of the specific situation. As standard practice and as part of the design of the Project, electrical equipment and fencing at the substation would be grounded. All fences, metal gates, pipelines, metal buildings, and other metal structures adjacent to the ROW that cross or are within the transmission line ROW would be grounded. If applicable, grounding of metallic objects outside of the ROW may also occur, depending on the distance from the transmission line as determined through the electrical studies. These actions take care of the majority of induced current effects on metallic facilities adjacent to the line by shunting the induced currents to ground through ground rods, ground mats, and other grounding systems, thus reducing the effect that a person may experience when touching a metallic object near the line (i.e., reduce electric shock potential). In the case of a longer parallel facility, such as a pipeline parallel to the Project over many miles, additional electrical studies would be undertaken to identify any additional mitigation measures (more than the standard grounding practices) that would need to be implemented to prevent damaging currents from flowing onto the parallel facility, and to prevent electrical shock to a person that may come in contact with the parallel facility. Some of the typical measures that could be considered for implementation, depending on the degree of mitigation needed, could include (NACE International 2003):	Correct paragraph. Typically for 230 and 345kV lines, fences, metal gates, etc are not grounded. At 500kV they will be. Refer to PAC transmission standard TD310.
Optical Ground Wire	1.4.1	B-14	1	Reliable and secure communications for system control and monitoring of Gateway West is very important to maintain the operational integrity of the Project and of the overall interconnected system. Primary communications for relaying and control would be provided via the OPGW that would be installed on the transmission lines. For the 500-kV transmission lines, a secondary communications path would be provided by the Proponents' existing microwave system, which is currently installed from the Central Wyoming area near the Windstar Substation west to existing substations near Boise, Idaho. A secondary communication path may also be developed using a powerline carrier. No new microwave sites are anticipated for the Project. Updated microwave equipment may be installed at existing sites and at the substations	Add discussion of 2 communication systems from Anticline to Bridger. Must be diverse paths. Insert somewhere in section.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Optical Ground Wire	1.4.1	B-15	2	Each structure would have two lightning protection shield wires installed on the peaks of each of the 500-kV single- or double-circuit lattice steel structures (see Figures B-2 and B-3). On the 230-kV H-frame structures (see Figure B-1) these lightning protection shield wires would be installed near the top of each pole. On both the 500-kV and 230-kV lines where communication is required, one of the shield wires would be composed of extra high strength steel wire with a diameter of 0.495 inch and a weight of 0.517 pound per foot. The second shield wire would be an OPGW constructed of aluminum and steel, which carries 48 glass fibers within its core. On the 500-kV lines, the OPGW would have a diameter of 0.637 inch and a weight of 0.375 pound per foot; on the 230-kV lines, the OPGW would have a diameter of 0.465 inch. The glass fibers inside the OPGW shield wire would provide optical data transfer capability among the Proponents' facilities along the fiber path. The data transferred are required for system control and monitoring. On lines where communication is not required, both of the shield wires would be composed of extra high strength steel wires with a diameter of 0.495 inch and a weight of 0.517 pound per foot For the Gateway Project, all 500-kV line segments would be designed to carry an OPGW. For the 230-kV lines, Segments 1W(a) and 1E would be designed to carry an OPGW, although the OPGW shield wire on Segment 1E would not immediately be connected to the communication system and would be left dark. Between the new Anticline Substation and the existing Jim Bridger Substation, two communication paths (underground or aerial) would be required for redundancy.	Add 345kV as appropriate in paragraph.
Access Roads	1.5	B-16 & B-24	2	Access and service roads are an essential part of the construction and operation of the Gateway West transmission line. Large foundation auger equipment, heavily loaded trucks, cranes, and specialized line construction equipment will be required for construction, maintenance, and emergency restoration activities. Annual ground based inspections require vehicular access using 4x4 trucks or 4x4 all-terrain vehicles (ATVs) to each structure site. Section 3 of this appendix describes in detail operational requirements...	Two sections 1.5 - Correct numbering
Access Roads	1.5	B-17	2nd		Change require to required in the first sentence.
Access Roads	1.5	B-17	4th		Change second sentence to read "reliability of steel h-frame and lattice structures ..."
Substations	1.5	B-24	1st		Change sentence to read "... includes four proposed substations and expansion at one planned and six existing substations"
Right-of-Way Width	2.1.1	B-27	1st		Add 345kV ROW width (150').
Right-of-Way Width	2.1.2	B-27	last		Document states "...landowners would be contacted to obtain right-of-entry for surveys and for geotechnical drilling...". Surveys and geotechnical drilling have already been performed at select locations, and field activities will continue through permitting, ROW acquisition, and up through construction.
Right-of-Way Width	2.1.1	B-27	last	Table B-5 provides a breakdown of the amount of land needed temporarily for construction and for operation over the life of the Project. During construction, temporary permission would be required from landowners and land management agencies for off-ROW access, staging areas, helicopter fly yards, and material storage. During operation, Project land requirements would be restricted to the ROW, including access roads, substations, and communication facilities. Access to the ROW would be in accordance with the land rights obtained as part of the easement acquisition process. As further details of the final Project design are engineered, the amount of land required may change.	Clarify paragraph so that readers are aware that project access roads that go outside the ROW will be used if permitted with original access plan for operations.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Right-of-Way Acquisition	2.1.2	B-28	Table B-5	(Refer to table)	Add table for Segment 3A, Anticline - Bridger.
Right-of-Way Acquisition	2.1.2	B-30	Table B-5	5. For 500 kV, wiring pulling/splicing sites would be the ROW width x 600 feet located approximately every 3 miles; for 230 kV, ROW width x 400 feet located every 9,300 feet. Typically, only sites that would be off of the ROW would be at large angle dead-ends. It is estimated that one in four sites would be off of the ROW.	Footnote 5; we want to revise distance between wire pulling/splicing sites to one reel length (approx. 9,250'). The pulling and tensioning also need to be the ROW width X 700' long.
Right-of-Way Acquisition	2.1.2	B-31	2nd		For clarification, minimum separation required from existing lines is not 1500 ft per WECC reliability standards. Separation required per WECC is the largest of the spans between the two lines, but at least 500 ft. 1500 ft separation is used in routing and design as the longest span is generally shorter than 1500 ft. In some instances, the longest span is greater than 1500 ft for which separation would be increased between the two lines.
Transmission Line Construction	2.2	B-32	Table B-6	(Refer to table)	1) please clarify that the acreages are for multiple pads in each segment and 2) please explain difference between construction and operations tower pad acreages and 3) please consider that the final pad left for operations will be reseeded but not recontoured
Transmission Line Construction	2.2	B-32	Table B-6	(Refer to table)	Add table for Segment 3A, Anticline - Bridger.
Transmission Line Construction	2.2	B-32 to B34	Tbl B-6		Regeneration station disturbance areas do not match (see Table B-3 for quantities). Disturbance areas should be: 0 (Segment 1E), 0.5 (Segment 1Wa Operation acres), 0 (Segment 1Wc), 11 (Project Totals, Construction acres). Also, what is the "additional substation disturbance in Segment 6? Verify Project Total quantities for Substations.
Transmission Line System Roads	2.2.1	B-35	2	Transmission line ROW access would be a combination of new access roads, improvements to existing roads, and use of existing roads as is. New access roads or improvements to existing access roads would be constructed using a bulldozer or grader, followed by a roller to compact and smooth the ground. Front-end loaders would be used to move the soil locally or off site. Typically, access to the transmission line ROW and tower sites requires a 14-foot-wide travel way for straight sections of road and a 16- to 20-foot-wide travel way at corners to facilitate safe movement of equipment and vehicles. Wherever possible, new access roads would be constructed within the proposed transmission line ROW, or existing roads would be used. In other cases, access roads would be required between the proposed transmission line and existing roads. Erosion control and sedimentation measures such as at-grade water bars, culverts, sediment basins, or perimeter control would be installed as required to minimize erosion during and subsequent to construction of the Project.	Add discussion of lower impact overland travel. Refer to PAC Transmission Standards TD501

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Site Preparation	2.2.4	B-37	1	Individual structure sites would be cleared to install the transmission line support structures and facilitate access for future transmission line and structure maintenance. Clearing of individual structure sites would be required to install the structures. Clearing individual structure sites would be done using a bulldozer to blade the required area. At each single-circuit 500-kV structure location, an area approximately 250 feet by 250 feet would be needed for construction laydown, tower assembly, and erection at each tower site. An area of approximately 300 feet by 250 would be needed for each 500-kV double-circuit tower site. An area approximately 150 feet by 125 feet would be required for 230-kV structure locations. This area would provide a safe working space for placing equipment, vehicles, and materials. The work area would be cleared of vegetation only to the extent necessary. After line construction, all areas not needed for normal transmission line maintenance, including fire and personnel safety clearance areas, would be graded to blend as near as possible with the natural contours, then revegetated as required	Add sentence for 345kV work area.
Staging Areas	2.2.3	B-37	Tbl B-8		Paragraph 1 states that fly yards would be used on Segments 2, 3, and 4 if the phased single-circuit or two single-circuit design options are used. If fly yards are indeed needed, there would be approximately 20, 12, and 41 fly yards for Segments 2, 3, and 4, respectively. This is not indicated in Table B-8 or anywhere else in this section.
String Conductors, Shield Wires ...	2.2.7	B-40	last	Pulling and tensioning sites for 500-kV construction would be required approximately every 3 miles along the ROW and would require approximately 5 acres each to accommodate required equipment. Pulling and tensioning sites for 230-kV construction would be required approximately every 2 miles along the ROW and would require approximately 1.2 acres each to accommodate required equipment. Equipment at sites required for pulling and tensioning activities would include tractors and trailers with spooled reels that hold the conductors and trucks with the tensioning equipment. To the extent practicable, pulling and tensioning sites would be located within the ROW. Depending on topography, minor grading may be required at some sites to create level pads for equipment. Finally, the tension and sag of conductors and wires would be fine-tuned, stringing sheaves would be removed, and the conductors would be permanently attached to the insulators at the support structure	Revise distance between wire pulling/splicing sites to one reel length (approx. 9,250'). The pulling and tensioning also need to be the ROW width X 700' long.
Communication Sys - Access Rds	2.3.2	B-42	1	Regeneration station roads would be constructed using a bulldozer or grader, followed by a roller to compact and smooth the ground. Front-end loaders would be used to move the soil locally or off site. Either gravel or asphalt would be applied to the prepared base layer.	Revise paragraph to mention need for a gravel road into all regen stations.
Substation Construction	2.4	B-42	1st		1st sentence states "construction activities at 12 locations". Are the 230-kV and 345-kV yards at Bridger counted as separate locations? In the last sentence, Heward is listed as an existing substation when in fact it is a new substation.
Foundation Installation	2.4.7	B-44	2nd		In 2nd and 5th sentences, change "reinforced steel" to "reinforcing steel".

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Control Building Construction	2.4.10	B-45	1	One or more control buildings are required at each substation to house protective relays, control devices, battery banks for primary control power, and remote monitoring equipment. The size and construction of the building depends on individual substation requirements. Typically, the control building would be constructed of concrete block, pre-engineered metal sheathed, or composite surfaced materials. Once the control house is erected, equipment is mounted and wired inside. In some cases an emergency generator may be located just outside the control house within the substation fenced area	Confirm last sentence; I think all stations will have an emergency generator; not just some.
Helicopter Use	2.5.2	B-47	2	The size and weight of the 500-kV double-circuit lattice steel structures preclude the use of helicopter erection methods7. These structures would be erected on site using appropriately sized cranes to assemble and erect the towers. The single-circuit 500-kV towers weigh less and in some cases it may be desirable to employ heavy lift helicopters in the tower erection process. To allow the construction contractor flexibility in what construction methods can be used, the construction specification would be written to allow the contractor the option of using ground-based or helicopter construction methods, or a combination thereof. Use of a helicopter for structure erection may be driven by various factors, including access to the structure locations, construction schedule, and/or construction economics.	Need to discuss conventional construction of foundations and tower leg erection.
Water Use	2.5.3	B-49	Table B-10		Reference to footnote 2 on 4th column under substations (Gallons for grading/site work/dust control) should reference footnote 3.
Construction Workforce	2.6.1	B-50	2	The Proponents' proposed schedule identifies general construction timeframes by segment and substation, generally 4 to 5 years (see Table B-17). Construction times by segment are, however, expected to range from about 8 months to 27 months; similarly, substation construction times would range from 2 to 9 months. This construction would take place within the broader timeframes identified in Table B-17, but the exact timing is unknown. The combined labor requirements by EPC shown in Figure B-15 are, therefore, based on a representative Project schedule that is used in the EIS for the purposes of analysis	Confirm substation construction durations; nine months seems short for Aeolus and Anticline.
Construction Workforce	2.6.1	B-51	Fig B-15		Need definition of EPC #1, #2, and #3 that is indicated in the legend below the figure. Otherwise, show total workforce without defining different EPC contracts.
Construction Equipment and Traffic	2.6.2	B-59	last		Change "... soil not be suitable ..." in second sentence to "... soil not suitable ...". Change "... transformer bank required .." in next to last sentence to "transformer bank delivered ...".

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Construction Schedule	2.6.4	B-61	3	Transmission line construction commences with contractor mobilization. The contractor would mobilize equipment and personnel to the construction site at various stages in the Project schedule depending on operational requirements. This would cumulatively require approximately 6 weeks throughout the schedule for each segment. Construction management, engineering support, inspection, materials handling, and administration are required throughout the Project. First, surveyors would start at one end of the segment and stake the locations of access roads. Road construction can start 1 to 2 weeks after the surveyors begin, which may require clearing in higher elevations where tree removal is required prior to road construction. After a couple of weeks of road construction another survey crew can begin staking the structure locations. A week or two after the survey crew starts staking structure locations, excavation of holes for foundations for 500-kV towers, or for directly embedded poles for 230-kV structures, can begin. For 500-kV construction, the installation of the concrete pier foundations would begin within the next couple of weeks. The foundations need time to cure and develop to full structural strength (i.e., compression capacity) before lattice towers can be installed. Five to six weeks after foundation installation has begun, lattice tower assembly and erection can begin. For 230-kV construction, structure assembly and setting can begin immediately after the excavation of holes has begun. For 230-kV and 500-kV construction, the wire installation crews would start approximately 8 to 12 weeks after assembly and erection/setting begins. This would be followed by final cleanup, reclamation, and restoration	Last 1/2 of paragraph; add discussion of 345kV construction
Hardware Mtc and Repairs	3.1.3	B-66	2	The Proponents plan to conduct maintenance on the critical 500-kV and 230-kV system using live line maintenance techniques. Maintenance on the transmission lines can be completed safely using live line techniques thereby avoiding an outage to the critical transmission line infrastructure. High reach bucket trucks along with other equipment are used to conduct these activities. For the 500-kV lattice tower structures, this requires that adequate space be available at each structure site so that the high reach bucket truck can be positioned to one side or the other of the structure and reach up and over the lower phases to access the upper center phase for live-line maintenance procedures. For the 230-kV H-frame structures, this requires that adequate space be available at each structure site so that a bucket truck can be positioned to access the outside phases. To allow room at each structure for these activities, in low slope areas a pad area is required with the structure in the center of 300 feet (ROW width) by 100 feet longitudinal for the double-circuit 500-kV structure, 250 feet by 100 feet for the single-circuit 500-kV structure, and 125 feet by 50 feet for the 230-kV H-frame structure. Figures B-16 through B-18 depict the space requirements for live-line maintenance. The size and location of these required pads near the structures may vary depending on the side slope and access road at each site. The work areas and pads would be cleared to the extent needed to safely complete the work. These pads would remain in place after construction, but would be revegetated after the initial construction is completed.	Add 345kV to live line maintenance sentence

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
Appendix F					
	General			All	For the sake of consistency and to minimize future potential impacts to visual resources, the Draft EIS should be revised to indicate that all land use plan amendments related to visual resources for this project be amended to a one-time allowance for the GW project without changing the VRM class for areas affected by the route. This allows for project implementation without opening the door for long-term development that could have potential adverse impacts on resources in the project area.
	2.1.1	General		The issues identified through public scoping and used to develop alternatives are as follows: • Objection to location on private lands ("If the project is for the general public good, it should be on public lands."); • Reliability and proposed separation distances of transmission lines; • Avoiding sensitive areas such as National Monuments and Wildlife Refuges, military operating areas, National Conservation Areas, Areas of Critical Environmental Concern (ACECs), and State Parks; • Effects to Native American traditional cultural properties and respected places; • Effects to paleontological resources; • Effects on wildlife habitat, plants, and animals including threatened, endangered, and sensitive species; • Effects to visual resources and existing viewsheds; • Effects to National Historic Trails (NHTs) and their viewsheds; • Land use conflicts and consistency with land use plans; • Effects to soils and water from surface-disturbing activities; • Effects to agriculture lands; • Effect on local and regional socioeconomic conditions; and • Management of invasive plant species and effective reclamation	Planning issues do not just include resource issues/impacts. They also should include management needs such as providing for transmission line corridors and/or exceptions to land use planning documents. This section of the Draft EIS should be revised to provide the missing key management needs addressed by amendments and/or exceptions.
	2.1.1	2	1st bullet	• Objection to location on private lands ("If the project is for the general public good, it should be on public lands.");	It is not clear what parenthetical statement "(If the project is for the general public good, it should be on public lands.)" is for or what it means or how it is addressed through this EIS process. The Draft EIS should be revised to clarify this.
	2.1.2	General		The following general planning criteria are being considered in the development of the proposed plan amendment: • National Environmental Policy Act (NEPA); • Existing laws, regulations, and BLM policies; • Plans, programs and policies of other federal, state and local governments, and Indian Tribes; • Public input; • Future needs and demands for existing or potential resource commodities and values; • Past and present use of public and adjacent lands; • Environmental impacts; • Social and economic values; • Public welfare and safety; and • President's National Energy Policy.	Planning Criteria typically include the legal and regulatory constraints under which the project and/or its analysis would be operating (See BLM Land Use Planning Handbook). Several of these bullets are not planning criteria (public input, future needs, environmental impacts, etc.). The Draft EIS should be revised to delete them from this section.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3	4	1	Effects on visual resources were determined through the use of computer modeling, field visits, and site-specific knowledge by local BLM staff. The analysis and effects determinations on visual resources are documented in Appendix G-1 for the Casper, Rawlins, Green River, Kemmerer, Cassia, Jarbidge, SRBOP, and Wells RMPs and the Malad, Bennett Hills/Timmerman Hills, Twin Falls, and Bruneau MFPs. These proposed amendments reference the analysis, maps of the locations (referred to as the areas of inconsistency [AOIs]), photographs, and simulations included in Appendix G-1. The visual analysis pertains only to the public lands, as the BLM does not establish visual management objectives for lands it does not administer.	It is unclear why this section goes into detail on the methodology for visual analysis. The Draft EIS should be revised to move this to the Visual Resources section of the Environmental Consequences section.
	3.2.4	10	3	The Record of Decision (ROD) for the Rawlins RMP states: "Avoidance Areas: Areas to be avoided which may be available for location of ROWs and Section 302 permits, leases, and easements with special stipulations or mitigation measures. For such authorizations, the area's environmental sensitivity and other feasible alternatives will be strongly considered." The Proposed Route was identified because it would have less effect on sage-grouse habitat. The Draft EIS considers an alternative to the Segment 1E Proposed Route (Alternative 1E-C) that would not cross areas mapped as VRM Class II; however it would have a higher impact on other resource. Mitigation measures were developed to reduce impacts to visual and other resources (refer to Table 2.7-1 in Chapter 2 of the Draft EIS)	Effects: Rawlins FO: The land use plan exceptions for the Rawlins FO is specific to this project and would not open the door for other projects. However, the Draft EIS discusses impacts from other projects that would apparently result from allowing this project. This is an incorrect assumption and the Draft EIS impacts analysis should be revised to disclose only the impacts from this project when it discusses impacts within the Rawlins FO.
	3.3.1	11,12	last	The Project's Proposed Route along Segments 3 and 4, as well as Alternatives 4B, 4C, 4D, and 4E, would cross through the Green River Management Area. Approximately 24 miles of Segment 3 are within the Planning Area, 10.5 of which cross BLM-managed land. Approximately 65 miles of Segment 4 are within the Planning Area, approximately 30 of which cross BLM-managed land. Alternatives 4B, 4C, 4D, and 4E follow the same route within the Green River Planning Area, 3.5 miles of which cross BLM-managed land...	The proposed Green River amendment allows a one time exception for this project only and therefore wouldn't allow other uses. See proposed amendment language on page 1-14.
	3.4.3	20	last	The following amendment would be needed if one of these alternatives is approved: Proposed Route: Permit a one-time allowance for Gateway West Project to cross the Dempsey Hockaday NHT in section 32, T 24 N, R 117 W Alternative 4A: Permit a one-time allowance for Gateway West Project to cross the Sublette NHT in section 11, T 23 N, R 118 W	It is confusing as to why the Kemmerer RMP proposes a one-time exception when the situation in this FO is much more appropriate for designation of a new utility corridor than other BLM FOs crossed by the proposed project. There is an existing corridor with existing transmission lines along the proposed power line alignment which would allow for this project to occur in an area that currently has transmission line development. The Draft EIS demonstrates a deficiency in the existing Kemmerer FO RMP, and the Draft EIS should be revised to address this clear planning issue- the need for designation of a utility corridor in the Kemmerer FO to address current and future transmission line development.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.4.3	21-22	last 2 on 21, 2nd on 22	Alternative 4A: Permit a one-time allowance for Gateway West Project without changing the VRM class for areas affected by the route.....Alternative routes 4C, 4E: Reclassify the VRM Class designation to VRM Class III in the portion of the planning area south and west of U.S. highway 30 (the highway) beginning on a north-south line along the high ridgeline approximately ¼ mile west of the current active coal leases (west of the town of Kemmerer); south along the high ridgeline to the ridgeline behind the active coal leases in T21N, R117W, Sec 25; then west following the high points of the topography approximately 3 miles south of the highway to T21N, R118W, Sec 28; then north-west following the high points of the topography within approximately 3 miles of the highway to T21N, R118 W, Sec 18; then north-west following the high points to within approximately ½ mile of the highway in T21N, R118W, Sec 12; then west to the junction of U.S. Highway 30/State Highway 89. For routing north and east of highway 30/State Highway 89, permit a one-time allowance for Gateway West Project without changing the VRM class for areas affected by the route. Alternatives 4B, 4D: Reclassify the VRM Class designation to VRM Class III in the portion of the planning area south and west of U.S. highway 30 (the highway) beginning on a north-south line along the high ridgeline approximately ¼ mile west of the current active coal leases (west of the town of Kemmerer);	It is unclear why the Draft EIS suggests changes to the VRM designations for Alternative 4B,4C, 4D and 4E versus allowing for one-time exceptions. The Draft EIS should be revised to allow for one time exceptions for VRM rather than amending the land use plan to change VRM class. This will minimize the risk of future long-term impacts to public lands (See general comment above).
	3.4.3	22	P3 Mitigation	Mitigation: Where the route would be visible on timbered slopes, limit tree to those portions of the right-of-way where it is required for safety rather in order to avoid creating a linear feature on the landscape. Vegetation removal requirements will consider Appendix A, Key Standards Relating to Electric System Reliability and Safety, of the Memorandum of Understanding with the Edison Electric Institute (2006)	This proposed mitigation measure is not feasible and is a direct contradiction to the intent of the cited MOU. The MOU's intent is to perform cover type conversion away from vegetation communities that could interfere with the conductors at some time in their life-cycle toward plant communities that will not. A requirement that we not remove trees except at structure locations will force us to prune to such an extent as to leave large numbers of tree remnants in the right of way. This practice would be unsightly, severely damage or kill existing trees, promote infestations of bark beetles, produce an unnecessary fire risk, and impose an unreasonable long-term management burden on the company and our rate payers. We recommend the Draft EIS be revised to remove this mitigation measure. If land managers want to prevent linear features, the right-of-way could be treated as outlined in the last paragraph of page 21 (3.6.2.2) for the Medicine Bow-Routt and Caribou-Targhee NFs.
	3.4.3	22-23		Mitigation for NHT crossings will be determined through the 106 process. These measures may include micrositing to place the line behind topographic features, replacing insulators with new ones made of non-reflective materials, and replacing conductors using non-specular wire to reduce visibility from Key Observation Points (KOPs) in highly visible places. This mitigation measure would be implemented once the Gateway West lines are operational. These mitigation measures would be especially pertinent where the new transmission line is visible from NHTs in the locations listed below (depending on the selected route)....	It is unclear why an amendment would be needed to amend NHT for Kemmerer RMP. Decision 5010 says it would be allowed on a case by case basis. Decision 6008 doesn't require an amendment.
	3.5.4	30	2nd full	These amendments may impact the ability to meet management objectives. Allowing additional utility corridors would result in impacts to the resources outside of those designated areas. These include impacts to wildlife, vegetation, soils, water, and cultural and visual resources.	Effects: Malad MFP: "Allowing additional utility corridors would impact..." is incorrect. The proposed amendment would allow only this project not new projects in the corridor. The Draft EIS needs to be revised to correct this.

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.6.3	32-33	4th down on 32 and 1st on 33	"The area classified as VRM Class II in the Goose Creek Travel Zone (within one-half mile of the Goose Creek Road between Wilson Pass and the Utah border), will be reclassified as VRM Class III."……."VRM classes are designated as shown in the Cassia RMP; however areas associated with the Gateway West Transmission Line Project will be reclassified as follows: the area north of the ROW (122 acres) in the Jim Sage area (AOICA-1 in Appendix G-1), and 806 acres Cottonwood Creek area (AOI CA-2 in Appendix G-1) from VRM III to VRM IV.	As stated in previous comments, we recommend that the Draft EIS be revised to allow exceptions for VRM in the Goose Creek travel zone instead of requiring that the VRM be changed. This also applies to Spring Canyon Area, Jim Sage and Cottonwood Creek. These are very small parcels that are not appropriate for large-scale allocation changes such as VRM class, particularly for a single project (See general comment 1 above).
	3.9.1	45	8	Alternatives 9D and 9G would pass through Cove, a non-motorized area within the C.J. Strike SRMA. This use is not in conformance with the SRMA designation based on "recreational, scenic or cultural values." (Note: The following amendment is presented to document the degree of change that would occur if this route were approved; however, the BLM Boise District has stated that they would not approve an amendment for a route through the Cove area.) The designation of the C.J. Strike SRMA is defined as: "C.J. Strike SRMA: This SRMA consists of 20,000 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir." (2.14 Recreation 2-20)	Because the BLM won't approve an amendment to allow for the route through the Cove area as indicated in the Draft EIS, then it is disingenuous to the public to retain this route for detailed analysis. Accordingly, the Draft EIS should revised to either allow an amendment for this route, or to eliminate it from detailed analysis.
	3.9.3	48	2	"Retain all public lands in the 43,000-acre ROW avoidance area to protect the visual corridor along the historic Oregon Trail and the resources along the Snake River canyon. Permit the Gateway West Transmission Line Project as a one-time allowance with significant mitigation required to maintain the cultural resources and traditional cultural properties of the area."	The statement "Permit the Gateway West Transmission Line Project as a one-time allowance with significant mitigation required to maintain the cultural resources" does not provide adequate information for the reader to understand what the consequences of this allowance are. For example, what is meant by "significant mitigation"? We recommend that the Draft EIS be revised to state "Allow GW a one-time exception with mitigation as appropriate based upon Section 106 consultation."
	3.9.3	48	last 1/2 of page	For Proposed Route 8: "Manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the OTA as Class IV and remaining areas as Class III. Approximately 6,400 acres of Class II areas associated with the Oregon Trail and scenic values associated with the Oregon Trail and scenic values associated with the Snake River Canyon would be designated as Class III to accommodate a major powerline R/W." For Alternatives 8E, 9D, and 9F: "Manage the areas along the Oregon Trail and the Snake River Canyon as VRM Class II, the OTA as Class IV and remaining areas as Class III. Approximately 3,100 acres of Class II areas associated with the Oregon Trail and scenic values associated with the Snake River Canyon is designated as Class III to accommodate a major powerline R/W." For Alternative 9G/9H: "VRM Class II areas within 250 of the Route centerline would be reclassified to VRM Class III, taking into account the need for a 0.5 mile buffer from NHTs. Mitigation will include adjusting the alignment to ensure a 0.5 mile buffer from NHTs is maintained."	For Routes 8, 8E, 9D, 9F, 9G and 9H we recommend that the Draft EIS be revised to make proposed land use plan amendments for one-time exceptions to VRM rather than wholesale changes in VRM management (See general comment 1).

Chapter/Subsection Title	Section	Page	Paragraph / Table / Figure	Taken from DEIS	Comment
	3.9.3	49	2 and 4	"This SRMA consists of 15,900 acres in the Snake River Canyon downstream from Grandview, Idaho that is managed for the protection of cultural and scenic values. The SRMA designation has been reduced by approximately 6,400 acres to accommodate a major powerline....."C.J. Strike SRMA: This SRMA consists of 16, 900 acres surrounding C.J. Strike Reservoir along the Snake River. The purpose of the SRMA is to provide enhanced recreation management associated with the reservoir, and protection of the Oregon Trail adjacent to the reservoir. The SRMA designation has been reduced by approximately 3,100 acres to accommodate a major powerline R/W."	It is not clear how the project is not in conformance with Slickspot Peppergrass CA page 4 or A-67 of SRPOB RMP. See also paragraph 4 and quote on F1-50, paragraph 5. We recommend the Draft EIS be revised to indicate this conformance or provide additional rationale to justify the conclusion that the project is not in conformance.
	3.9.3	50	5	"b) If direct or indirect negative impacts to the species or its habitat are anticipated as a result of new BLM actions, the activity will be modified to avoid or minimize negative impacts and, where feasible, promote species conservation."	It is not clear how the project is not in conformance with Slickspot Peppergrass CA page 4 or A-67 of SRPOB RMP. See also paragraph 4 and quote on F1-50, paragraph 5. We recommend the Draft EIS be revised to indicate this conformance or provide additional rationale to justify the conclusion that the project is not in conformance.
	3.9.4	51	2	Allowing construction in the Utility Avoidance Area and in areas of high cultural importance such as the Guffey Butte-Black Butte Archaeological District could impact the ability to meet management objectives of protecting these areas and maintaining the cultural landscape. Potential impacts could include loss of historic artifacts, loss of historic character of the landscape, and diminished traditional cultural properties and resources. "Significant mitigation" would be required to limit these impacts as described in the SRBOP ROD 2-1; which could involve extensive cultural surveys, micrositing, data recovery, and on-site mitigation.	If you require "significant mitigation" then one would expect correspondingly significant decreases in project impacts to cultural resources. We request that the Draft EIS be revised to provide specific information regarding this "significant mitigation". The Draft EIS also needs to be revised to disclose the effectiveness of this mitigation and how it would decrease impacts to cultural resources.
	3.10.2	52	6	"Prohibit all land disturbing developments and uses on archeological sites."	Based on the mitigation proposed for cultural resources, the proposed project would not build on an archaeological site. Accordingly, the Draft EIS should be revised to remove this requirement.

John Marshall
<john@jmarshalllaw.com>
10/28/2011 05:15 PM

To gateway_west_wymail@blm.gov
cc Damon Thompson <damont@farmdevcorp.com>
bcc
Subject Comments of Sailor Creek and Gateway West Project owners

Please find attached comments to the Gateway West DEIS by the owners and operators of the Sailor Creek and Grindstone Butte Projects in Elmore County, Idaho. Comments to DEIS.pdf

Comments of owners and operators of the Sailor Creek and Grindstone Butte Projects to the Draft Environmental Impact Statement for Gateway West Project

October 28, 2011

From: The owners and operators of the Grindstone Butte and Sailor Creek Projects
P.O. Box 1201, Boise, Idaho 83702

To: BLM

Following are our comments to the Draft Environmental Impact Statement for the Gateway West Transmission Line Project. Our comments are directed at the portion of the DEIS addressing the proposed route segment 9e.2 and segment 9g of the alternate route 9B. Both segments would bring the proposed high voltage power line through our agricultural land and would directly and adversely affect our farming operations.

Overview of the Affected Area and Agricultural Project

We have attached an aerial photo, labeled Map 1, that shows the locations of the proposed power line corridors relative to our farming operation in Townships 6S and 7S, and Ranges 9E and 10E, Boise Meridian. We operate two high-lift irrigation projects in this area. Our Sailor Creek project, the more northern project, was constructed in the early 1960s and has been used to irrigate approximately 4000 acres every year since. It is a fully contained, pressurized system. The Grindstone Butte Project is to the south and irrigates approximately 13,000 acres. It was also constructed in the 1960s and is serviced primarily via a canal that runs along the western side of the project in a northwest to southeast direction. The mainlines for both projects run in an east-west direction.

Over time we have developed highly efficient irrigation and agricultural practices on both projects—a necessity given the high cost of pumping the water to the projects from the Snake River—that include the installation of center pivot sprinkler systems and variable speed mainline pumps. We have also tailored our cultivation practices to maximize efficiencies and effectiveness of fertilizer and chemical applications, including by planting our rows in a north-south direction, which is required because of the east-west direction of our mainlines. Our agricultural operation uses extensive aerial fertilizer and chemical applications. Because we plant north-south, the fly patterns for our aerial applications also go north-south.

Opposition to the proposed locations studied in the DEIS

The installation of a power line that crosses either the Sailor Creek or Grindstone projects will adversely affect our operations. For that reason, we oppose both of the proposed line locations studied in the DEIS. As a practical matter, bringing the line across either project will mean a significant swath of agricultural land will be taken out of

production. We oppose this because we are not interested in giving up any of our agricultural ground and believe there are feasible alternative locations for the power line that would not affect our operations or effectively eliminate the possibility of future development of adjacent, potentially productive agricultural ground.

We have heard the power company propose that power line towers can be located in a manner that will not interfere with center pivot sprinkler systems and therefore have little impact on agriculture. This is not true, at least for our situation. For one, we often irrigate pivot corners with other sprinkler methods, and so any agricultural land around the towers will be taken out of production. Moreover, our aerial applicator confirms that he needs a minimum of ½ mile, more when he is fully loaded, to make a turn after he completes a pass on our fields. Consequently, an east-west power line cutting across our north-south running farm will result in at least a one mile wide corridor that we can no longer farm. As noted above, we are not interested in reducing our irrigated agricultural land and therefore oppose the power line crossing our property.

Proposal to re-study the original line location or other locations that do not cross Sailor Creek or Grindstone Butte

Both of our projects are surrounded by publically owned, desert rangeland. There are a number of ways to route this line in adjacent rangelands that avoid our ground and the adverse impacts to our agricultural operations. Indeed, when this project was first proposed, the line location was to the west of our projects. Later, without any input from or discussion with us, the proposed location was changed, purportedly because of height restrictions associated with the Saylor Creek bombing range. Since then, the portion of the Gateway West project in our area has focused only on studying where the line will cross our property without any discussion about routing it in ways that would avoid our agricultural ground.

Because we were not included in any discussions on the matter, we are uncertain how deep the discussions were over the height restrictions associated with the bombing range. We live out there and see the flight operations day-to-day. Practical experience suggests that a power line in the original proposed location would not affect aircraft operations, and we suspect there was little practical consideration given to the issue and the elimination of the proposal had more to do with restrictions that show up on a map. Accordingly, we request that 1) detailed consideration be given to moving the line back to its original proposed location west of our project and that we be involved in the discussions concerning the height restrictions and possible variances, and 2) consideration be given to routing the line in other locations that avoid our farm completely.

Opposition to Segment 9g of Alternative 9B

Of the proposals studied in the current DEIS, Segment 9g of Alternative 9B is the worst. The approximate location of the centerline of this proposal is shown on the attached the attached aerial photograph labeled Map 1. The aerial shows that the

proposed segment cuts through the heart of the Grindstone Butte Project. This would so negatively impact the operation of the project—effectively dividing it in half—that there is no conceivable way that we could support the project if the line is located anywhere near this alignment. A line coming through this corridor would affect the operation of at least 10 center pivot sprinklers. The proposed line location is also adjacent to our potato storage operation, mint still and employee housing. And as noted above, the minimum one-mile-wide swath that we would need to take out of production to accommodate a power line through the project would result in the removal of thousands of acres from the project and would bifurcate the project in a manner that would destroy the economies of scale and efficiencies that make the farm operate profitably. If the final EIS were to propose placing the line anywhere near Segment 9g's study area, we will adamantly and vehemently oppose and resist the project.

Opposition to Segment 9e.2 of the Proposed Route

The attached Map 1 shows the approximate location of Segment 9e.2 of the Proposed Route for the power line. Although this proposed alignment is superior to the proposed segment 9g discussed above, it also needlessly affects the farm and will result in the reduction of significant agricultural acres in our farm. Accordingly, without accommodation discussed below, we oppose the location of the proposed Segment 9e.2 alignment.

In addition to negatively affecting our existing agricultural production, the proposed location cuts through the best potential agricultural ground in the area, effectively removing it from future agricultural use. With abundant desert rangeland in the area to site a power line, it is shortsighted in our view to site the power line in an area that has at least the potential for future agricultural production.

Proposal for location to west of projects with land swap

Attached to these comments is another aerial photograph labeled Map 2 that presents an alternate alignment for the power line. On this attachment we show in orange the proposed line location that would avoid cutting through the center of our projects. Our proposed location would run along the western edge of the Grindstone Project but east of other private land in the area and also east of the Saylor Creek bombing range. At this location the line would be at a lower elevation and therefore would have less impact on our aerial fertilizer and chemical applications. As noted on the map, the line would still cut through existing agricultural land, shown in cross-hatched orange, that we could no longer effectively produce on. Consequently, because we do not intend to reduce our agricultural production, we propose exchanging this ground with the BLM for land of equivalent value in the green cross-hatched area on Map 2 that appears to have similar soil types and gradient to our productive agricultural ground. Our proposal would place the power line in an area that has the least impact on prime agricultural ground and that would have the least adverse impact on our operations.

Proposal for location to east of projects with land swap

These comments include a third aerial photograph labeled Map 3. This aerial shows a second proposal that would also serve to lessen the impact on our farms by keeping the line on rangeland to the extent possible and away from productive agricultural ground. This proposal would also require a land exchange of the private land shown in crosshatched orange with the BLM ground selected from the area shown in cross-hatched green to avoid the net loss of agricultural ground. Although we do not feel this alternative is as positive as the one proposed on Map 2 because the east-west run of the power line would cut through potential agricultural ground, it is far more acceptable than either of the studied alternatives because it would not result in the net loss to our agricultural production.

Conclusion

We strongly oppose either of the alternatives studied in the DEIS. We propose that the final EIS require one of the following in our geographical area discussed in these comments:

1) Return the location of the power line to the original proposed alternative that had the line a couple of miles west of our projects;

2) Move the location of the line to the alignment shown on our Map 2 and institute a land exchange with the BLM to replace affected agricultural land with similar ground adjacent to our projects; or

3) Move the location of the line to the alignment shown on our Map 3 and institute a land exchange with BLM to replace affected agricultural land with similar productive ground adjacent to our projects.

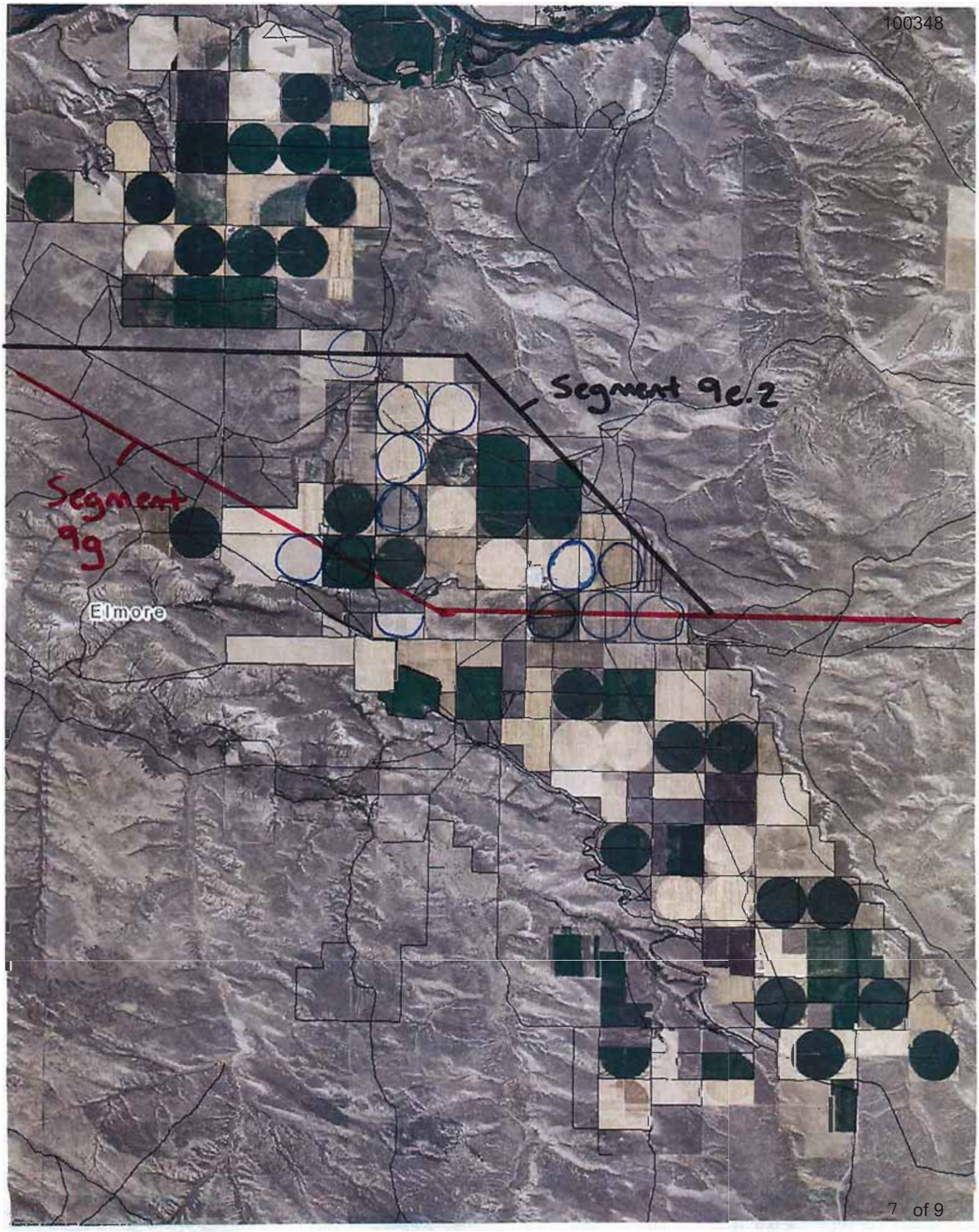
Sincerely,

Allen Noble
Landowner in Grindstone Butte Project
Owner and Manager, ATN Holdings LLC (landowner in Sailor Creek)
President Farm Development Corporation (tenant famer of both Sailor Creek and Grindstone Butte)
Owner and Manager AM Properties LLC (landowner in Grindstone Butte)

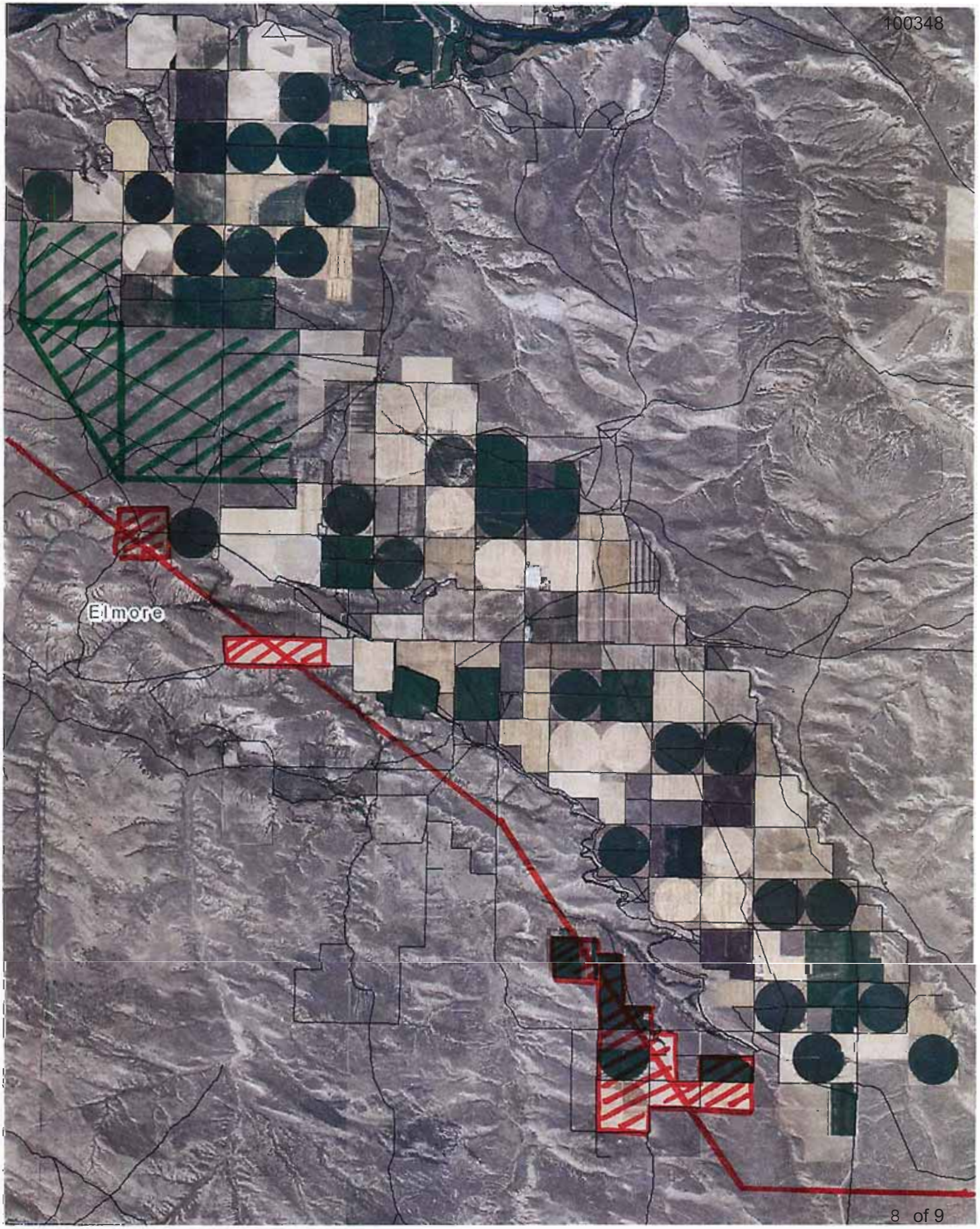
Mark Noble
Owner and Manager, MAN Farms, LLC (landowner in Sailor Creek and Grindstone Butte)
Owner, AM Properties, LLC
President, Grindstone Butte Mutual Canal Company
Vice-President, Farm Development Corporation

Craig Castagneto
Owner and Manager, CMC Farms, LLC (landowner in Grindstone Butte)

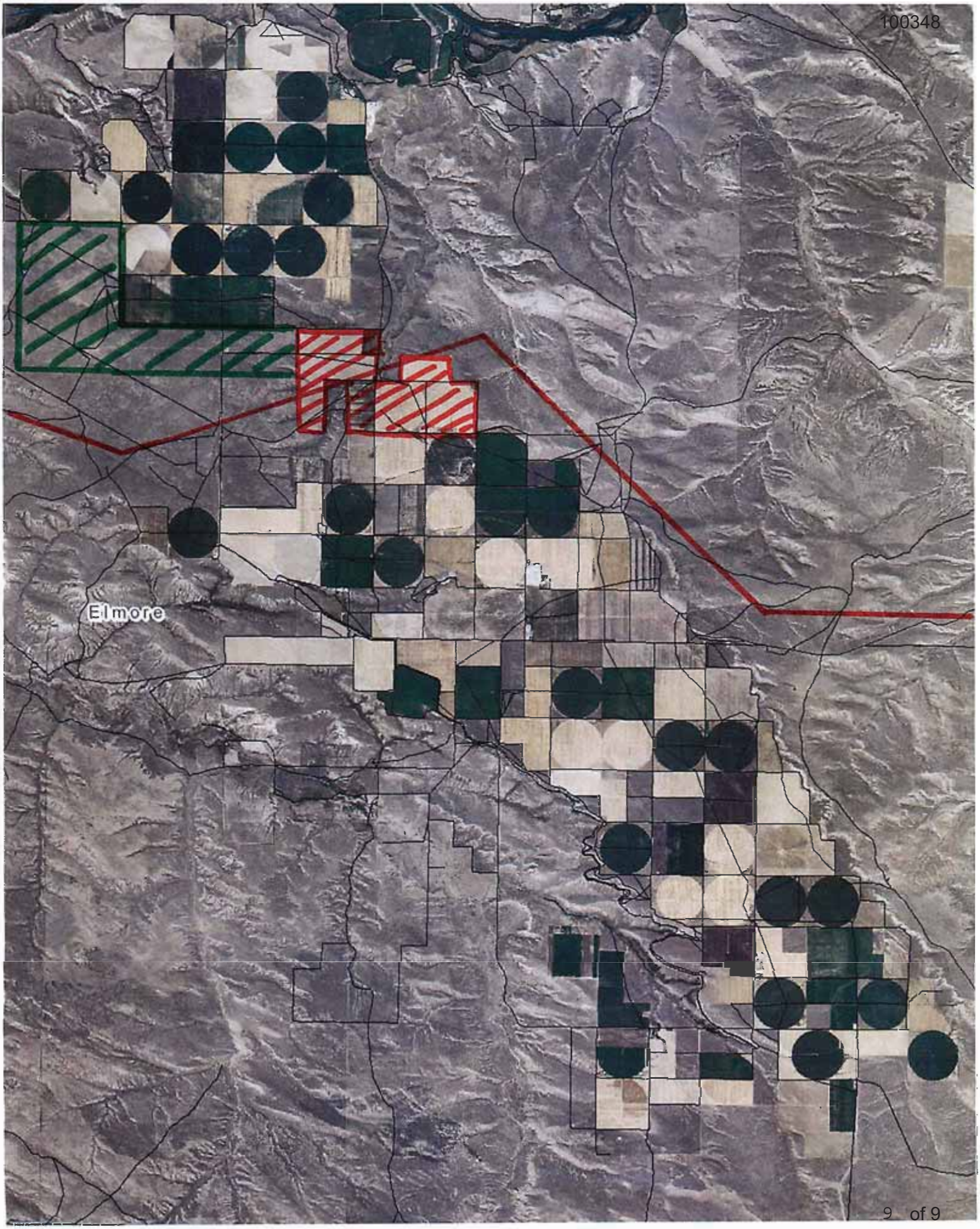
Rusty Johnson
Owner and Manager, LEJ Farms, LLC (landowner in Grindstone Butte)



MAP 1



MAP 2



MAP 3

100532

Draft EIS Comment Form

Gateway West Transmission Line Project
Draft EIS comment period: July 29, 2011 - October 28, 2011

ENTERED 100532

BLM

Date: 9-26-11

First Name: Dan Last Name: McHargue

Organization or Office Name: Seven U D Ranches

Mailing Address: Box 177 City: Rockland State: Ida Zip: 83271

Daytime Phone: 548-2261 Email:

☐ Please check here if you wish for your personal information to remain confidential*

*If you wish for your contact information to remain confidential, BLM will protect the personal information that you submit to the extent allowed by law. However, the information may be subject to the Freedom of Information Act (U.S.C. etc.). See privacy note on reverse.

Please submit your comments by October 28, 2011. Information submitted on this form is being voluntarily provided solely for the purpose of commenting on the Gateway West Transmission Line Project.

Comment:

We don't want any part of this line on our land. We have 16 tracts of land between East fork and Portage Canyon. You have been given 2 options of routs to use other than through Rockland use one of them?

To mail this comment form please send to:

Bureau of Land Management | Gateway West Project | P.O. Box 20879 | Cheyenne, WY 82003

Comments may also be submitted via email to: Gateway_West_WYMail@blm.gov or online at www.wy.blm.gov/nepa/cfodocs/gateway_west

1/1

continued on back

From: info@gatewayeis.com
Sent: Monday, September 26, 2011 1:56 PM
To: Gateway BLM
Subject: A comment from gatewayeis.com

Name:
Pat McCammon

Organization:
Six S Ranch LLC

Mailing Address:
1354 E. Six S Ranch Rd

Mailing Address 2:

City:
Declo

State:
Idaho

Zip:
83323

Daytime Phone:
1-208-654-2564

E-mail:
pl6s@hughes.net

Confidential:
No

DEIS Location:
chapter all section all page all

Comment:
To whom it may concern, Thank you for the forum at the Burley Best Western Inn. It was very informative. Also Thank-you for your consideration on routing around the ranch. We however have a few concerns about the EIS not taking a hard look at what the Cassia County task force has to say. They have put a lot of time in to studying the area and have great concern in there own well being as a county. And the lack of value that was given to the property values in the county is another great concern of ours. Many of the folk that live here have made great effort to improve the way of life in the county. Which makes the value of all our property worth way more than you have stated in your proposal. Looking forward to further meetings. Six S Ranch, manager Pat McCammon

100328, 100372, 100503

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5353 Yellowstone Road

Cheyenne, WY 82009

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Tel 303.298.1000
Fax 303.299.1356

Via E-mail: Gateway_West_WYMail@blm.gov
and Overnight Express

October 28, 2011

Bureau of Land Management
Gateway West Transmission Line Project
5353 Yellowstone Road
Cheyenne, Wyoming 82009

Attention: Mr. Walt George, Project Manager

Re: Comments on Gateway West Transmission Line Project Draft Environmental Impact Statement

Dear Mr. George:

TransWest Express LLC ("TWE") submits these comments on the Draft Environmental Impact Statement ("DEIS") for the Rocky Mountain Power and Idaho Power (together the "Proponents") Gateway West Transmission Line Project ("GWW Project"). TWE has proposed to construct a 600 kV direct-current transmission line beginning in south-central Wyoming, extending through northwestern Colorado and central Utah, southwest into southern Nevada, and ending near Las Vegas ("TWE Project"). In alignment with federal land use and energy goals, the TWE Project will reliably and cost-effectively deliver clean renewable energy produced in Wyoming to the Desert Southwest region (Arizona, California and Nevada) providing much-needed electricity to thousands of homes and businesses every year.

The TWE Project has been under development since 2005 and is anticipated to begin construction in 2013. In December 2008, TWE filed an amended application for a right-of-way grant with the Bureau of Land Management ("BLM") for the right to construct, operate and maintain the TWE Project on federal land (BLM Serial Number WYW-177893). Following review of the application, the BLM determined that an EIS would be prepared pursuant to the requirements of the National Environmental Policy Act and Federal Land Policy and Management Act. In 2010, Western Area Power Administration ("Western") through its participation in the TWE Project became a joint lead agency on the TWE Project EIS. On January 4, 2011, BLM and Western published a notice in the Federal Register initiating a 90-day public scoping period for the TWE Project EIS. *see* Notice of Intent, 76 Fed. Reg. 379, January 4, 2011. A series of 23 public scoping meetings were held at various locations in Wyoming,

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Colorado, Utah and Nevada. The public scoping period for the TWE Project ended April 4, 2011 and the TWE Project draft EIS is currently being prepared.

The GWW Project and the TWE Project have been reviewed in several regional and sub-regional electrical system planning processes that focus on coordination of major projects, establishing system needs and ensuring reliability is maintained or improved through the development of these projects. In addition, on October 5, 2011 both the TWE Project and the GWW Project were selected as two of seven priority projects for the federal Rapid Response Team for Transmission, led by the White House Council on Environmental Quality, the U.S. Department of the Interior, the U.S. Department of Energy, the U.S. Department of Agriculture and other federal agencies, demonstrating the importance of both projects to the national and regional electric infrastructure. TWE supports the GWW Project and considers it to be complementary to the TWE Project; however, because portions of the TWE Project are proposed to be routed within the same corridors and rights-of-way as the GWW Project, TWE has the following concerns and comments which should be addressed in the Final Environmental Impact Statement ("FEIS").

General

TWE generally supports the GWW Project, but is concerned that decisions on the GWW Project should not be treated by the agencies as consuming the Section 368 corridors (referred to as the "West-Wide Energy Corridors") designated by the Approved Resource Management Plan Amendments/Record of Decision for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States (BLM 2009) or other designated utility corridors, thus precluding construction of other proposed transmission lines.

Figure 1.1-1 (Project Overview) includes a black dotted line around the proposed route and the alternatives but there is no legend on the map identifying the significance of that line. We assume this line describes either the study area for routing or the resource analysis area but cannot confirm that assumption. Please include an explanation in the FEIS for the meaning of that line on Figure 1.1-1.

There are statements on page 3.19-22 that Segments 2 and 3 generally follow I-25 and U. S. Highway 30. In fact, those segments generally follow I-80 and U.S. Highway 30.

Siting Strategy

Currently there are three major regional transmission projects pursuing right-of-way permits within the same general area as the GWW Project; these projects are the GWW Project, the TWE Project, and the Gateway South Project ("GWS Project"). *see* Notice of Intent, 76 Fed. Reg. 18241, April 1, 2011. While each project ultimately meets different purposes and needs, there are areas in which the projects utilize similar routes and corridors. It is important that BLM consider all three projects in any decision making so as not to foreclose multiple uses of the same

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corridor. In addition, BLM should leave flexibility in determining the ultimate routing of the projects to allow for cooperation and accommodation of the other projects.

TWE supports the approach taken by the GWW Project Proponents in attempting to utilize the West-Wide Energy Corridors to the maximum extent possible, as well as the other utility corridors identified in the respective land use plans. While such an approach can minimize additional disturbance created by multiple transmission line corridors, it is also important for the agency to recognize the essential need (for system reliability as described on page 2-23) to keep a minimum distance between high voltage power lines.

Due to the similar paths of the GWW Project, the GWS Project and the TWE Project and their proposed use of some of the same corridors, there are multiple locations in which BLM should consider the siting of three transmission lines in the FEIS. Rocky Mountain Power and TWE continue to work on a feasible joint siting plan to address these areas and while TWE appreciates the flexibility shown by the agencies as reflected in the DEIS to maximize use of the established utility corridors while recognizing the practical need for separation of high voltage lines, TWE requests that BLM give particular consideration to the overlap between the three projects within Segment 2 (Aeolus to Creston) of the GWW Project.

Near Sinclair, Wyoming there are two considerations regarding the location of Segment 2. In the vicinity of the checkerboard lands near Sinclair, Wyoming, TWE plans to construct its northern terminal on private lands owned by TWE's affiliate, The Overland Trail Cattle Company LLC, in Section 31 of T. 21 N., R 86 W., as shown on the general terminal location map and site layout included within the TWE Project FS299 application (January 2010) and plan of development (July 2010) on file with BLM. The northern terminal will utilize all of the available constructible land in this section of private land. TWE has also filed an interconnect request with Rocky Mountain Power to interconnect with the GWW Project at the TWE Project northern terminal. It is imperative that the GWW Project right-of-way be granted in a manner that will allow interconnection with the TWE Project northern terminal while avoiding interference with the siting, construction and operation of the TWE Project and the northern terminal.

For the approximately 40 miles of Segment 2 between Rawlins and Creston in Wyoming, in the issuance of the final right-of-way, BLM should give additional consideration to the multiple projects planned through this corridor. The TWE Project, the GWW Project, and the GWS Project have all identified a single common route along the existing utility corridor parallel to I-80 (reference point 2f-2h-2i on Figure A-3). While the BLM West-Wide Energy Corridor is nominally 3,500 feet wide, it contains an existing Rocky Mountain Power 230 kV transmission line and numerous pipelines. In addition, it overlaps in part with a corridor through the Greater South Pass Sage-Grouse Core Management Area as established by the Wyoming Governor's Executive Order 2011-5, "Greater Sage-grouse Core Area Protection" ("EO 2011-5"). However, the corridor boundaries do not match exactly. While TWE will continue to work with Rocky Mountain Power to develop a joint siting plan for the three projects, in consideration of the existing constraints within the West-Wide Energy Corridor it is imperative that the BLM

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consider the three pending projects through the corridor when making decisions and issuing the final right-of-way grant for the GWW Project.

Proposed mitigation measure LU-4 (page 3.17-74) which would require coordination with the Chokecherry-Sierra Madre Wind Farm and the TransWest Express Project developers along the Segment 2 Proposed Route to ensure mutually compatible siting of transmission lines and wind energy facilities would address a number of the issues raised above and we encourage BLM to include this mitigation measure in its Record of Decision ("ROD") for the GWW Project and right-of-way grants.

Design/Schedule Variation

As disclosed on page 2-1, the Proponents have identified three variations to the overall GWW Project: 1) a right-of-way design variation, 2) a structure variation and 3) a schedule variation. TWE appreciates the BLM maintaining the flexibility in its ROD (assuming the project is approved) for the Proponent's to select among the proposed action and the variations based on economic conditions at the time of construction; however, the BLM must assure that such flexibility does not negatively impact other proposed transmission projects, such as the TWE Project, and that if an action alternative is selected that allows a right-of-way width of up to 375 feet, such right-of-way does not prevent other transmission lines from utilizing West-Wide Energy Corridors or designated land use plan corridors. The BLM should describe in the FEIS its plans to accommodate other proposed transmission projects within common corridors should the agency select an alternative which allows the three identified variations.

Land Use Plan Amendments and Visual Resource Management ("VRM")

Table 2.2-1 is a useful summary of the areas where the proposed action or an alternative to the proposed action would not be consistent with the governing land use plans and therefore the necessary land use plan amendments which might be required if that alternative is selected. This summary, combined with the detail contained in the text of the DEIS, allows reviewers to easily determine how the proposed action might conform with existing land use plans. TWE does question, however, whether the DEIS satisfies the requirement of 43 C.F.R. §1610.4-7 that the draft EIS on a proposed plan amendment identify the BLM's preferred alternative. The DEIS does not identify a preferred alternative among the proposed action and alternatives and Appendix F, which describes the possible plan amendments depending on the route chosen, does not identify preferred alternatives. 43 C.F.R. §1610.5-5(b) provides that if an EIS is prepared on a plan amendment, the amending process shall follow the procedure required for preparation of a plan, which includes identification of the preferred alternative in the draft EIS. TWE requests that the FEIS clarify how the plan amendment process set forth in the DEIS satisfies the requirements of the BLM regulations.

The VRM analysis in the DEIS (Section 3.2 and Appendix G) contemplates in several places that, although the GWW Project would not conform with the existing VRM classification for a given area, the project should be permitted in those "Areas of Inconsistency" as a visually

altering action but without changing the VRM classification for the area. The discussions of these revisions in Table 2.2-1, Sections 3.2, Chapter 4 and Appendix F are somewhat confusing regarding whether an amendment of various plans is proposed or simply a "one time" exception to the plan requirements. TWE does not necessarily object to that approach but is uncertain of the legal authority for exceptions to VRM plan conformance without an amendment to the applicable plan. In addition, because the transmission line will have obvious effects on visual resources (as described in the DEIS), TWE questions whether it makes sense to describe the amendment (if that is what is planned) as a one-time exception (rather than amending the applicable VRM classification) when the allowed use clearly has the effect of altering the visual resource quality of the area. TWE requests that the FEIS clarify the decision-making authority for "one-time exceptions" to the requirement that projects be consistent with applicable VRM classifications. In addition, the FEIS should explain whether such "one-time" exceptions preclude the subsequent siting in that corridor of other linear projects; if it does, then the purpose for designating the West-Wide Energy Corridors would be undermined.

The descriptions of the potential plan amendments are also unclear regarding the extent of the proposed amendments; i.e., whether the VRM class is being changed only for the width of the right-of-way or for the width of the Cumulative Impacts Analysis Area for visual resources or for some other area. We request that the FEIS make clear the geographic extent of any proposed amendment.

With respect to the Rawlins Resource Management Plan, PCW believes that it is appropriate to clarify that a VRM Plan Amendment is required by the ROD on the Rawlins Resource Management Plan ("RMP") which was signed on December 24, 2008. The Record of Decision on the Rawlins RMP ("Rawlins ROD") remanded the RMP to the Rawlins Field Office with respect to the VRM class designations and decision portions of the RMP, in response to arguments by those filing protests that it is inappropriate to attempt to manage lands in the checkerboard and in the vicinity of other private lands for Class II VRM. *see* Director's Protest Resolution Report, Rawlins Resource Management Plan, December 24, 2008, pgs. 139-140. The Rawlins ROD requires the Field Office to update the inventory of visual resources within the planning area and, using the updated inventory as a baseline, consider classifications in a future VRM-targeted EIS for the planning area. The Rawlins ROD then specifies that, until that VRM EIS and Supplemental RMP are prepared, "the Approved RMP will utilize the VRM class designations as established and analyzed in the No Action Alternative, Alternative 1 in the Proposed RMP/Final EIS." However, until such time as a VRM EIS and Supplemental RMP is prepared for the entire Field Office, the planning regulations as well as BLM's planning handbook specifically authorize a plan amendment to be considered in connection with a proposed action. *see* 43 C.F.R. §1610.5-3(c); Land Use Planning Handbook H-1601-1. VI.F., VII.B.

The DEIS does not appear to have considered the pending VRM Plan Amendment for a portion of the Rawlins Field Office. *see* Notice of Availability, 76 Fed. Reg. 44039, July 22, 2011. The Decision Area for the draft VRM Plan Amendment includes a portion of Segment 2 of the GWW Project. TWE recommends that the FEIS incorporate the decision on the pending

VRM Plan Amendment or, if no decision has been rendered by that time, at least incorporate discussion of the Preferred Alternative under the draft plan amendment.

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> On pages 3.10-26 through 3.10-29, EPMs PGC-1 through PGC-36 for big game species are unclear. The wording of these EPMs does not allow for determination of whether monitoring is completed for the immediate vicinity surrounding construction areas or whether it is completed for the entire winter range, parturition area, etc. An area component (i.e., monitoring should occur within 0.5 miles of construction areas) would clarify these EPMs and still provide adequate protection mechanisms to ensure that construction and operation activities do not impact these species.
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TWE assumes that the intent of VEG-8 is to prevent the spread of weeds, specifically by trucks and equipment traveling through infested areas. This measure as written appears to be extremely prescriptive and if strictly interpreted is a particularly onerous way to accomplish weed management. TWE believes it would be more appropriate on such a large project for BLM to leave some flexibility as to how to accomplish noxious/invasive weed management by instead

requiring an instrument such as a Weed Management Plan that could be adapted to the requirements of the GWW Project in each area. This approach was set forth in the Sigurd to Red Butte No. 2 345 kV Transmission Project Draft Environmental Impact Statement (BLM 2011) and should be considered by BLM in the FEIS for the GWW Project.

Mitigation measure WILD-5 on page 3.10-30 is not supported by the analysis in the document. There is no evidence presented that bat roosting sites within 0.5 miles of the ROW would be impacted by construction activities, although some impacts to roosting sites might occur within the disturbed areas of the ROW. To be reflective of the expected impacts that are presented in the DEIS, BLM should re-evaluate WILD-5 and require surveys only where direct loss of roosting habitats might occur from construction activities. In addition, this mitigation measure applies to all lands. The BLM should clarify in the FEIS its authority to require this mitigation measure on non-public lands.

Mitigation measure WILD-6 is described on page 3.10-36 in a section regarding raptors. WILD-6 requires 10 years of annual reports on nesting activity on any towers constructed by the GWW Project. We assume that this requirement is limited to raptors, but the language of the mitigation measure itself is not so limited. Please clarify in the FEIS whether WILD-6 would apply to all nesting species or only to raptors.

Mitigation Measure WILD-7, which requires all guy wires to be marked with bird deterrent devices to avoid avian collisions with structures on public lands, cites BLM Instruction Memorandum 2010-022 ("IM 2010-022") as its authority. IM 2010-022 does not require the marking of transmission tower guy wires with bird deterrents. IM 2010-022 is specific to fences and guy wires for turbines and MET towers. IM 2010-022 recommends, but does not require, all existing guy wires be marked. While marking of guy wires may be appropriate in some high risk areas, it is not appropriate and should not be required for the entire GWW Project. In addition, the DEIS fails to evaluate the visual effects of placing highly reflective, "glow in the dark" bird flight diverters on transmission tower guy wires. In our experience, placing bird flight diverters on MET tower guy wires greatly increases the visibility of the tower, often to several miles. In the FEIS we request BLM evaluate the effectiveness and visual impacts of bird flight diverters on transmission tower guy wires and provide a justification (other than IM 2010-022) for requiring bird flight diverters on all structures located on public lands.

TESWL-22 (page 3.11-69) prohibits guyed-structures within occupied sagebrush obligate habitats within the area managed under the Kemmerer Resource Management Plan. As disclosed in the DEIS, the risk to greater sage-grouse resulting from collisions with transmission structures is very low. Furthermore, anecdotal reports of mortalities do not constitute peer reviewed science or best available scientific information. TESWL-22 does not seem justified considering the very low risk to sage-grouse associated with guyed-transmission structures and BLM should re-evaluate the appropriateness of this proposed mitigation measure in the FEIS.

Although the DEIS states at page 2-173 that the environmental protection measures ("EPM's") proposed by the Proponents apply project-wide (i.e., regardless of land ownership),

and the additional mitigation measures proposed by the agencies will apply only to federal lands (except for measures required by the USFWS to meet ESA requirements), the mitigation measure denoted WILD-10 (page 3.10-34) states that it will be applied project-wide, presumably referring to both public and private lands. This requirement is not required under the Endangered Species Act. TWE questions the authority of the agencies to enforce this mitigation measure on non-public lands and requests that the FEIS clarify the legal or regulatory authority for this mitigation measure. We note that it is a violation of the MBTA to take migratory birds, their eggs, feathers or nests, but measures to avoid take, especially on non-public lands, should be left to the discretion of the Proponents.

Page 3.11-66 states that mitigation measures TESWL-14 and TESWL-15 are based on recent BLM Instructional Memorandums ("IM"). However, it is not stated which IMs are the basis for these statements. As stated, the mitigation measures appear to be in conflict with portions of the IMs that have been recently issued by BLM and with EO 2011-5. Wyoming BLM IM WY-2010-012 states that its intent is to be consistent with Wyoming's core area policy. As such, it specifies that surface disturbing activities that occur in sage-grouse nesting habitat located outside of designated core areas are restricted within 2 miles (versus the 4 miles stated in TESWL-14) of occupied leks between March 15 and June 30. Wyoming BLM IM WY-2010-012 also states that surface disturbing activities and surface occupancy in sage-grouse habitats outside of designated core areas are restricted within 0.25 miles of active leks (versus the 0.6 miles stated in TESWL-15). Mitigation measures TESWL-14 and TESWL-15 should be consistent with IM WY 2010-12 for those segments of the transmission line that are in Wyoming. Measure TESWL-11 should also be changed to reflect consistency with WY IM 2010-12.

On page 3.11-105, PRC-6 (which requires pre-construction surveys) should only be required in habitats that are potentially suitable for ferruginous hawk nesting activities.

Greater Sage-Grouse

On page 3.11-18, the section regarding addressing direct losses of greater sage-grouse as part of the analysis framework should be reevaluated by BLM. Calculating direct loss of sage-grouse would be highly speculative and would likely result in an overestimate or underestimate of the actual impacts. The purpose of the Habitat Equivalency Analysis is to utilize habitat services as a surrogate for direct mortality as discussed in the DEIS. Calculating direct loss could be necessary if formal ESA section 7 consultation was being completed for sage-grouse; however, formal consultation is not occurring. Calculating direct loss of individual sage-grouse does not need to be completed for the purposes of the NEPA analysis and should not be required by BLM.

In the last paragraph on page 3.11-71 we would like to point out that listing of greater sage-grouse would have potential negative impacts on the economic stability of many industrial and agricultural activities in addition to the oil and gas industry in Wyoming. The mining, transmission, agriculture and ranching, and wind development industries would all be impacted

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by listing of greater sage-grouse. The BLM should include in the FEIS a list of all such activities and industries.

Cumulative Impacts

TWE commends the BLM on Chapter 4, which does a good job of describing the existing and proposed projects within the GWW Project vicinity and the potential cumulative impacts of the GWW Project when added to the impacts of those other existing and potential developments. However, there is an incorrect statement on page 4-45 that the proposed Chokecherry and Sierra Madre Wind Energy Project is located in sage-grouse core area as established by EO 2011-5. The wind project is not in core area and this statement should be corrected in the FEIS.

Thank you for your consideration of these comments.

Very truly yours,

TRANSWEST EXPRESS LLC

Garry L. Miller
Director – Land and Environmental Affairs

"Garry Miller"
<Garry.Miller@tac-denver.com>
10/28/2011 05:07 PM

To <Gateway_West_WYMail@blm.gov>
cc
bcc
Subject Gateway West Transmission Line Project DEIS

Dear Mr. George,

Attached are the comments of TransWest Express LLC concerning the Gateway West Transmission Line Project Draft Environmental Impact Statement. A hard copy will follow by overnight express.

Respectfully submitted,

Garry Miller

TransWest Express LLC

<<2011-10-28 TWE Comments on GWW DEIS.pdf>> 2011-10-28 TWE Comments on GWW DEIS.pdf

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Via E-mail: Gateway_West_WYMail@blm.gov
and Overnight Express

October 28, 2011

Bureau of Land Management
Gateway West Transmission Line Project
5353 Yellowstone Road
Cheyenne, Wyoming 82009

Attention: Mr. Walt George, Project Manager

Re: Comments on Gateway West Transmission Line Project Draft Environmental Impact Statement

Dear Mr. George:

TransWest Express LLC ("TWE") submits these comments on the Draft Environmental Impact Statement ("DEIS") for the Rocky Mountain Power and Idaho Power (together the "Proponents") Gateway West Transmission Line Project ("GWW Project"). TWE has proposed to construct a 600 kV direct-current transmission line beginning in south-central Wyoming, extending through northwestern Colorado and central Utah, southwest into southern Nevada, and ending near Las Vegas ("TWE Project"). In alignment with federal land use and energy goals, the TWE Project will reliably and cost-effectively deliver clean renewable energy produced in Wyoming to the Desert Southwest region (Arizona, California and Nevada) providing much-needed electricity to thousands of homes and businesses every year.

The TWE Project has been under development since 2005 and is anticipated to begin construction in 2013. In December 2008, TWE filed an amended application for a right-of-way grant with the Bureau of Land Management ("BLM") for the right to construct, operate and maintain the TWE Project on federal land (BLM Serial Number WYW-177893). Following review of the application, the BLM determined that an EIS would be prepared pursuant to the requirements of the National Environmental Policy Act and Federal Land Policy and Management Act. In 2010, Western Area Power Administration ("Western") through its participation in the TWE Project became a joint lead agency on the TWE Project EIS. On January 4, 2011, BLM and Western published a notice in the Federal Register initiating a 90-day public scoping period for the TWE Project EIS. *see* Notice of Intent, 76 Fed. Reg. 379, January 4, 2011. A series of 23 public scoping meetings were held at various locations in Wyoming,

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Colorado, Utah and Nevada. The public scoping period for the TWE Project ended April 4, 2011 and the TWE Project draft EIS is currently being prepared.

The GWW Project and the TWE Project have been reviewed in several regional and sub-regional electrical system planning processes that focus on coordination of major projects, establishing system needs and ensuring reliability is maintained or improved through the development of these projects. In addition, on October 5, 2011 both the TWE Project and the GWW Project were selected as two of seven priority projects for the federal Rapid Response Team for Transmission, led by the White House Council on Environmental Quality, the U.S. Department of the Interior, the U.S. Department of Energy, the U.S. Department of Agriculture and other federal agencies, demonstrating the importance of both projects to the national and regional electric infrastructure. TWE supports the GWW Project and considers it to be complementary to the TWE Project; however, because portions of the TWE Project are proposed to be routed within the same corridors and rights-of-way as the GWW Project, TWE has the following concerns and comments which should be addressed in the Final Environmental Impact Statement ("FEIS").

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General

TWE generally supports the GWW Project, but is concerned that decisions on the GWW Project should not be treated by the agencies as consuming the Section 368 corridors (referred to as the "West-Wide Energy Corridors") designated by the Approved Resource Management Plan Amendments/Record of Decision for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States (BLM 2009) or other designated utility corridors, thus precluding construction of other proposed transmission lines.

Figure 1.1-1 (Project Overview) includes a black dotted line around the proposed route and the alternatives but there is no legend on the map identifying the significance of that line. We assume this line describes either the study area for routing or the resource analysis area but cannot confirm that assumption. Please include an explanation in the FEIS for the meaning of that line on Figure 1.1-1.

There are statements on page 3.19-22 that Segments 2 and 3 generally follow I-25 and U. S. Highway 30. In fact, those segments generally follow I-80 and U.S. Highway 30.

Siting Strategy

Currently there are three major regional transmission projects pursuing right-of-way permits within the same general area as the GWW Project; these projects are the GWW Project, the TWE Project, and the Gateway South Project ("GWS Project"). *see* Notice of Intent, 76 Fed. Reg. 18241, April 1, 2011. While each project ultimately meets different purposes and needs, there are areas in which the projects utilize similar routes and corridors. It is important that BLM consider all three projects in any decision making so as not to foreclose multiple uses of the same

corridor. In addition, BLM should leave flexibility in determining the ultimate routing of the projects to allow for cooperation and accommodation of the other projects.

TWE supports the approach taken by the GWW Project Proponents in attempting to utilize the West-Wide Energy Corridors to the maximum extent possible, as well as the other utility corridors identified in the respective land use plans. While such an approach can minimize additional disturbance created by multiple transmission line corridors, it is also important for the agency to recognize the essential need (for system reliability as described on page 2-23) to keep a minimum distance between high voltage power lines.

Due to the similar paths of the GWW Project, the GWS Project and the TWE Project and their proposed use of some of the same corridors, there are multiple locations in which BLM should consider the siting of three transmission lines in the FEIS. Rocky Mountain Power and TWE continue to work on a feasible joint siting plan to address these areas and while TWE appreciates the flexibility shown by the agencies as reflected in the DEIS to maximize use of the established utility corridors while recognizing the practical need for separation of high voltage lines, TWE requests that BLM give particular consideration to the overlap between the three projects within Segment 2 (Aeolus to Creston) of the GWW Project.

Near Sinclair, Wyoming there are two considerations regarding the location of Segment 2. In the vicinity of the checkerboard lands near Sinclair, Wyoming, TWE plans to construct its northern terminal on private lands owned by TWE's affiliate, The Overland Trail Cattle Company LLC, in Section 31 of T. 21 N., R 86 W., as shown on the general terminal location map and site layout included within the TWE Project FS299 application (January 2010) and plan of development (July 2010) on file with BLM. The northern terminal will utilize all of the available constructible land in this section of private land. TWE has also filed an interconnect request with Rocky Mountain Power to interconnect with the GWW Project at the TWE Project northern terminal. It is imperative that the GWW Project right-of-way be granted in a manner that will allow interconnection with the TWE Project northern terminal while avoiding interference with the siting, construction and operation of the TWE Project and the northern terminal.

For the approximately 40 miles of Segment 2 between Rawlins and Creston in Wyoming, in the issuance of the final right-of-way, BLM should give additional consideration to the multiple projects planned through this corridor. The TWE Project, the GWW Project, and the GWS Project have all identified a single common route along the existing utility corridor parallel to I-80 (reference point 2f-2h-2i on Figure A-3). While the BLM West-Wide Energy Corridor is nominally 3,500 feet wide, it contains an existing Rocky Mountain Power 230 kV transmission line and numerous pipelines. In addition, it overlaps in part with a corridor through the Greater South Pass Sage-Grouse Core Management Area as established by the Wyoming Governor's Executive Order 2011-5, "Greater Sage-grouse Core Area Protection" ("EO 2011-5"). However, the corridor boundaries do not match exactly. While TWE will continue to work with Rocky Mountain Power to develop a joint siting plan for the three projects, in consideration of the existing constraints within the West-Wide Energy Corridor it is imperative that the BLM

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consider the three pending projects through the corridor when making decisions and issuing the final right-of-way grant for the GWW Project.

Proposed mitigation measure LU-4 (page 3.17-74) which would require coordination with the Chokecherry-Sierra Madre Wind Farm and the TransWest Express Project developers along the Segment 2 Proposed Route to ensure mutually compatible siting of transmission lines and wind energy facilities would address a number of the issues raised above and we encourage BLM to include this mitigation measure in its Record of Decision ("ROD") for the GWW Project and right-of-way grants.

Design/Schedule Variation

As disclosed on page 2-1, the Proponents have identified three variations to the overall GWW Project: 1) a right-of-way design variation, 2) a structure variation and 3) a schedule variation. TWE appreciates the BLM maintaining the flexibility in its ROD (assuming the project is approved) for the Proponent's to select among the proposed action and the variations based on economic conditions at the time of construction; however, the BLM must assure that such flexibility does not negatively impact other proposed transmission projects, such as the TWE Project, and that if an action alternative is selected that allows a right-of-way width of up to 375 feet, such right-of-way does not prevent other transmission lines from utilizing West-Wide Energy Corridors or designated land use plan corridors. The BLM should describe in the FEIS its plans to accommodate other proposed transmission projects within common corridors should the agency select an alternative which allows the three identified variations.

Land Use Plan Amendments and Visual Resource Management ("VRM")

Table 2.2-1 is a useful summary of the areas where the proposed action or an alternative to the proposed action would not be consistent with the governing land use plans and therefore the necessary land use plan amendments which might be required if that alternative is selected. This summary, combined with the detail contained in the text of the DEIS, allows reviewers to easily determine how the proposed action might conform with existing land use plans. TWE does question, however, whether the DEIS satisfies the requirement of 43 C.F.R. §1610.4-7 that the draft EIS on a proposed plan amendment identify the BLM's preferred alternative. The DEIS does not identify a preferred alternative among the proposed action and alternatives and Appendix F, which describes the possible plan amendments depending on the route chosen, does not identify preferred alternatives. 43 C.F.R. §1610.5-5(b) provides that if an EIS is prepared on a plan amendment, the amending process shall follow the procedure required for preparation of a plan, which includes identification of the preferred alternative in the draft EIS. TWE requests that the FEIS clarify how the plan amendment process set forth in the DEIS satisfies the requirements of the BLM regulations.

The VRM analysis in the DEIS (Section 3.2 and Appendix G) contemplates in several places that, although the GWW Project would not conform with the existing VRM classification for a given area, the project should be permitted in those "Areas of Inconsistency" as a visually

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altering action but without changing the VRM classification for the area. The discussions of these revisions in Table 2.2-1, Sections 3.2, Chapter 4 and Appendix F are somewhat confusing regarding whether an amendment of various plans is proposed or simply a "one time" exception to the plan requirements. TWE does not necessarily object to that approach but is uncertain of the legal authority for exceptions to VRM plan conformance without an amendment to the applicable plan. In addition, because the transmission line will have obvious effects on visual resources (as described in the DEIS), TWE questions whether it makes sense to describe the amendment (if that is what is planned) as a one-time exception (rather than amending the applicable VRM classification) when the allowed use clearly has the effect of altering the visual resource quality of the area. TWE requests that the FEIS clarify the decision-making authority for "one-time exceptions" to the requirement that projects be consistent with applicable VRM classifications. In addition, the FEIS should explain whether such "one-time" exceptions preclude the subsequent siting in that corridor of other linear projects; if it does, then the purpose for designating the West-Wide Energy Corridors would be undermined.

The descriptions of the potential plan amendments are also unclear regarding the extent of the proposed amendments; i.e., whether the VRM class is being changed only for the width of the right-of-way or for the width of the Cumulative Impacts Analysis Area for visual resources or for some other area. We request that the FEIS make clear the geographic extent of any proposed amendment.

With respect to the Rawlins Resource Management Plan, PCW believes that it is appropriate to clarify that a VRM Plan Amendment is required by the ROD on the Rawlins Resource Management Plan ("RMP") which was signed on December 24, 2008. The Record of Decision on the Rawlins RMP ("Rawlins ROD") remanded the RMP to the Rawlins Field Office with respect to the VRM class designations and decision portions of the RMP, in response to arguments by those filing protests that it is inappropriate to attempt to manage lands in the checkerboard and in the vicinity of other private lands for Class II VRM. *see* Director's Protest Resolution Report, Rawlins Resource Management Plan, December 24, 2008, pgs. 139-140. The Rawlins ROD requires the Field Office to update the inventory of visual resources within the planning area and, using the updated inventory as a baseline, consider classifications in a future VRM-targeted EIS for the planning area. The Rawlins ROD then specifies that, until that VRM EIS and Supplemental RMP are prepared, "the Approved RMP will utilize the VRM class designations as established and analyzed in the No Action Alternative, Alternative 1 in the Proposed RMP/Final EIS." However, until such time as a VRM EIS and Supplemental RMP is prepared for the entire Field Office, the planning regulations as well as BLM's planning handbook specifically authorize a plan amendment to be considered in connection with a proposed action. *see* 43 C.F.R. §1610.5-3(c); Land Use Planning Handbook H-1601-1. VI.F., VII.B.

The DEIS does not appear to have considered the pending VRM Plan Amendment for a portion of the Rawlins Field Office. *see* Notice of Availability, 76 Fed. Reg. 44039, July 22, 2011. The Decision Area for the draft VRM Plan Amendment includes a portion of Segment 2 of the GWW Project. TWE recommends that the FEIS incorporate the decision on the pending

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requiring an instrument such as a Weed Management Plan that could be adapted to the requirements of the GWW Project in each area. This approach was set forth in the Sigurd to Red Butte No. 2 345 kV Transmission Project Draft Environmental Impact Statement (BLM 2011) and should be considered by BLM in the FEIS for the GWW Project.

Mitigation measure WILD-5 on page 3.10-30 is not supported by the analysis in the document. There is no evidence presented that bat roosting sites within 0.5 miles of the ROW would be impacted by construction activities, although some impacts to roosting sites might occur within the disturbed areas of the ROW. To be reflective of the expected impacts that are presented in the DEIS, BLM should re-evaluate WILD-5 and require surveys only where direct loss of roosting habitats might occur from construction activities. In addition, this mitigation measure applies to all lands. The BLM should clarify in the FEIS its authority to require this mitigation measure on non-public lands.

Mitigation measure WILD-6 is described on page 3.10-36 in a section regarding raptors. WILD-6 requires 10 years of annual reports on nesting activity on any towers constructed by the GWW Project. We assume that this requirement is limited to raptors, but the language of the mitigation measure itself is not so limited. Please clarify in the FEIS whether WILD-6 would apply to all nesting species or only to raptors.

Mitigation Measure WILD-7, which requires all guy wires to be marked with bird deterrent devices to avoid avian collisions with structures on public lands, cites BLM Instruction Memorandum 2010-022 ("IM 2010-022") as its authority. IM 2010-022 does not require the marking of transmission tower guy wires with bird deterrents. IM 2010-022 is specific to fences and guy wires for turbines and MET towers. IM 2010-022 recommends, but does not require, all existing guy wires be marked. While marking of guy wires may be appropriate in some high risk areas, it is not appropriate and should not be required for the entire GWW Project. In addition, the DEIS fails to evaluate the visual effects of placing highly reflective, "glow in the dark" bird flight diverters on transmission tower guy wires. In our experience, placing bird flight diverters on MET tower guy wires greatly increases the visibility of the tower, often to several miles. In the FEIS we request BLM evaluate the effectiveness and visual impacts of bird flight diverters on transmission tower guy wires and provide a justification (other than IM 2010-022) for requiring bird flight diverters on all structures located on public lands.

TESWL-22 (page 3.11-69) prohibits guyed-structures within occupied sagebrush obligate habitats within the area managed under the Kemmerer Resource Management Plan. As disclosed in the DEIS, the risk to greater sage-grouse resulting from collisions with transmission structures is very low. Furthermore, anecdotal reports of mortalities do not constitute peer reviewed science or best available scientific information. TESWL-22 does not seem justified considering the very low risk to sage-grouse associated with guyed-transmission structures and BLM should re-evaluate the appropriateness of this proposed mitigation measure in the FEIS.

Although the DEIS states at page 2-173 that the environmental protection measures ("EPM's") proposed by the Proponents apply project-wide (i.e., regardless of land ownership),

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and the additional mitigation measures proposed by the agencies will apply only to federal lands (except for measures required by the USFWS to meet ESA requirements), the mitigation measure denoted WILD-10 (page 3.10-34) states that it will be applied project-wide, presumably referring to both public and private lands. This requirement is not required under the Endangered Species Act. TWE questions the authority of the agencies to enforce this mitigation measure on non-public lands and requests that the FEIS clarify the legal or regulatory authority for this mitigation measure. We note that it is a violation of the MBTA to take migratory birds, their eggs, feathers or nests, but measures to avoid take, especially on non-public lands, should be left to the discretion of the Proponents.

Page 3.11-66 states that mitigation measures TESWL-14 and TESWL-15 are based on recent BLM Instructional Memorandums ("IM"). However, it is not stated which IMs are the basis for these statements. As stated, the mitigation measures appear to be in conflict with portions of the IMs that have been recently issued by BLM and with EO 2011-5. Wyoming BLM IM WY-2010-012 states that its intent is to be consistent with Wyoming's core area policy. As such, it specifies that surface disturbing activities that occur in sage-grouse nesting habitat located outside of designated core areas are restricted within 2 miles (versus the 4 miles stated in TESWL-14) of occupied leks between March 15 and June 30. Wyoming BLM IM WY-2010-012 also states that surface disturbing activities and surface occupancy in sage-grouse habitats outside of designated core areas are restricted within 0.25 miles of active leks (versus the 0.6 miles stated in TESWL-15). Mitigation measures TESWL-14 and TESWL-15 should be consistent with IM WY 2010-12 for those segments of the transmission line that are in Wyoming. Measure TESWL-11 should also be changed to reflect consistency with WY IM 2010-12.

On page 3.11-105, PRC-6 (which requires pre-construction surveys) should only be required in habitats that are potentially suitable for ferruginous hawk nesting activities.

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Greater Sage-Grouse

On page 3.11-18, the section regarding addressing direct losses of greater sage-grouse as part of the analysis framework should be reevaluated by BLM. Calculating direct loss of sage-grouse would be highly speculative and would likely result in an overestimate or underestimate of the actual impacts. The purpose of the Habitat Equivalency Analysis is to utilize habitat services as a surrogate for direct mortality as discussed in the DEIS. Calculating direct loss could be necessary if formal ESA section 7 consultation was being completed for sage-grouse; however, formal consultation is not occurring. Calculating direct loss of individual sage-grouse does not need to be completed for the purposes of the NEPA analysis and should not be required by BLM.

In the last paragraph on page 3.11-71 we would like to point out that listing of greater sage-grouse would have potential negative impacts on the economic stability of many industrial and agricultural activities in addition to the oil and gas industry in Wyoming. The mining, transmission, agriculture and ranching, and wind development industries would all be impacted

by listing of greater sage-grouse. The BLM should include in the FEIS a list of all such activities and industries.

Cumulative Impacts

TWE commends the BLM on Chapter 4, which does a good job of describing the existing and proposed projects within the GWW Project vicinity and the potential cumulative impacts of the GWW Project when added to the impacts of those other existing and potential developments. However, there is an incorrect statement on page 4-45 that the proposed Chokecherry and Sierra Madre Wind Energy Project is located in sage-grouse core area as established by EO 2011-5. The wind project is not in core area and this statement should be corrected in the FEIS.

Thank you for your consideration of these comments.

Very truly yours,

TRANSWEST EXPRESS LLC

Garry L. Miller
Director – Land and Environmental Affairs

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Bureau of Land Management
Gateway West Project
PO Box 20879
Cheyenne, WY 82003

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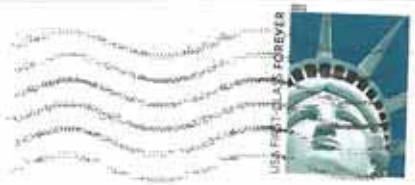

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Gateway West Project
PO Box 20879
Cheyenne, WY 82003

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Draft EIS Comment Form

100336

Gateway West Transmission Line Project
Draft EIS comment period: July 29, 2011 - October 28, 2011

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CHEYENNE, WYOMING

BLM

Date: Oct. 25, 2011

First Name: Russell Last Name: Patterson

Organization or Office Name: TRIPLE ACE INC.

Mailing Address: 1800 Z Street City: Heyburn State: Id Zip: 83336

Daytime Phone: 208.678.0441 Email: aces@cableone.net

☐ Please check here if you wish for your personal information to remain confidential*

*If you wish for your contact information to remain confidential, BLM will protect the personal information that you submit to the extent allowed by law. However, the information may be subject to the Freedom of Information Act (U.S.C. etc.). See privacy note on reverse.

Please submit your comments by October 28, 2011. Information submitted on this form is being voluntarily provided solely for the purpose of commenting on the Gateway West Transmission Line Project.

Comment: See attached Comments & Map

To mail this comment form please send to:

Bureau of Land Management | Gateway West Project | P.O. Box 20879 | Cheyenne, WY 82003

Comments may also be submitted via email to: Gateway_West_WYMail@blm.gov or online at www.wy.blm.gov/nepa/cfodocs/gateway_west

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Dear BLM Officials:

October 25, 2011

We would like to voice our concerns to you in regards to the Gateway West Project Route. We are not adverse to its need but rather to the possible location of the route.

Our farm is located at 950 South and 1200 West of Burley in Cassia County and the power line would go along the northern boundary of our farm as well as cut directly through a farm we rent at 900 South and 1350 West to 1500 West. We have hand lines in these fields and we are concerned about the workers moving hand lines under these high powered lines. We are also concerned about pivot Repairmen who are working on pivot towers which are even closer to the line, especially on hot days as when the lines naturally expand. Tractor operators and their electronic equipment are also affected by the stray electrical current from the power line, as well as interference to radio signals which are used many times daily. Our last point of concern is for the aerial spray applicators who spray our potatoes and barley. They need to get close to the pivot edges and the liability of them getting into the power line would be tremendous. Any of these stated concerns would make it more difficult and cause a significant hardship on our ability to farm due to loss of timeliness, efficiency, safety, and added costs; not to mention the loss of production on farmable ground.

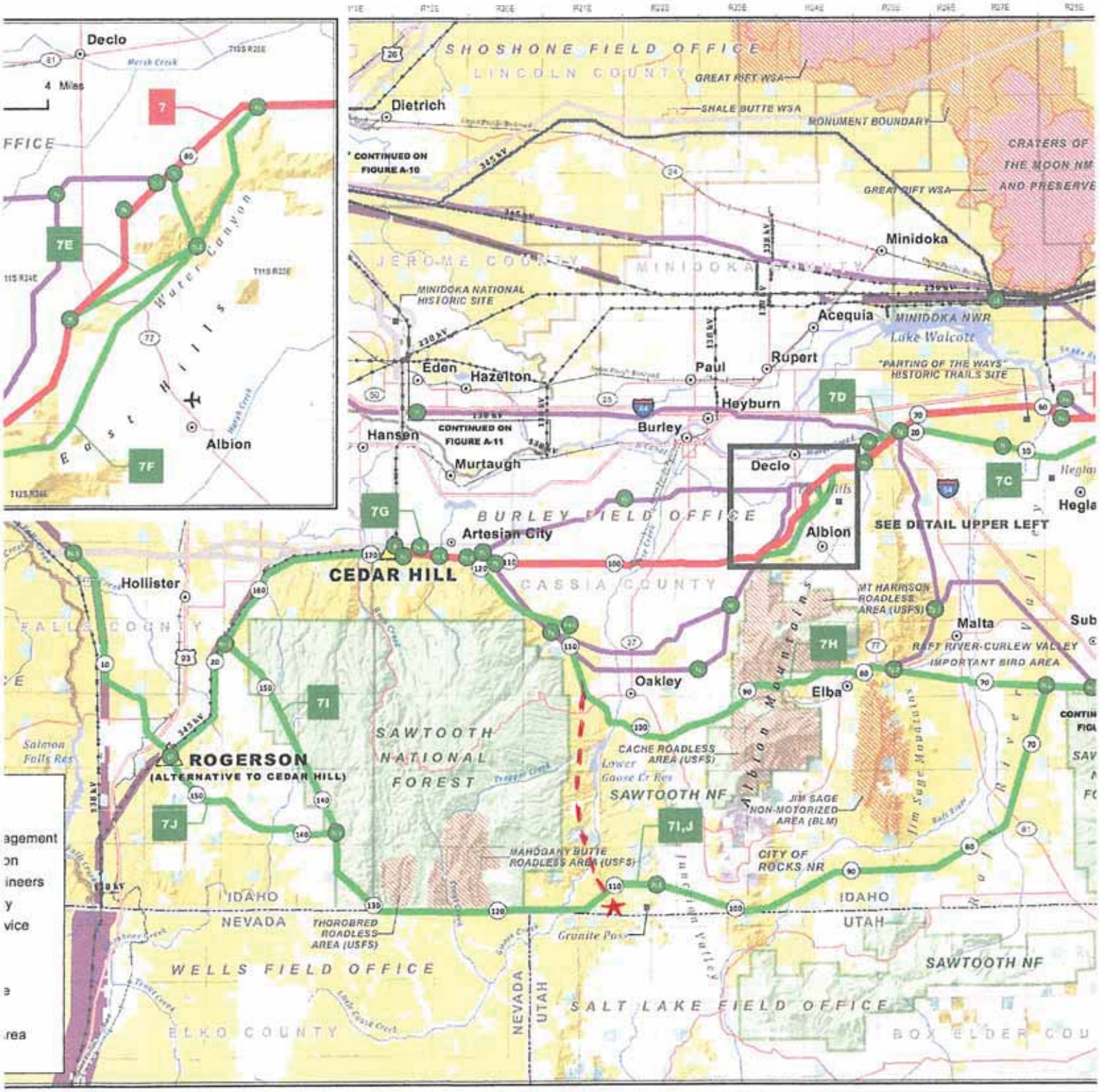
A suggested route we would like to recommend is to follow the Utah line route to the 110 location on the 7I, J Route. (See attached Map) We then suggest it turn northwest into the Goose Creek Drainage towards the west side of the Oakley Reservoir. As indicated by Walt George to us, this area contains a smaller population of Sage Grouse habitat than the more populated route located further west (7I). If this new route were used, it would eliminate the extra distance and costs associated with the other 7I and 7J routes to Rogerson, (Alternative to Cedar Hill) and avoid more major populated Sage Grouse habitat and other game route areas.

This suggested route along the East side of the foothills is also in a "storm shadow" which would increase the ease of accessibility. It is located in more of the desert areas and less likely to be impacted by adverse weather because it covers significant areas of very low precipitation.

Last of all, I think there would be less resistance from landowners on this route, as most of it is cattle rangeland and not highly valued, irrigated row crop land. A route with the least amount of impact on private property owners would be a much more agreeable situation for everyone.

Thank you for your consideration and please contact us if you have any further questions.

Russell & Lisa Patterson
Triple Ace Inc.



★ New Proposed Route

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Draft EIS Comment Form

Gateway West Transmission Line Project
Draft EIS comment period: July 29, 2011 - October 28, 2011

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BLM

Date: Oct. 25, 2011

First Name: Lisa Last Name: Patterson

Organization or Office Name: Triple Ace Inc.

Mailing Address: 1800 Z Street City: Heyburn State: ID Zip: 83336

Daytime Phone: 208-678-0441 Email: aces@cableone.net

☐ Please check here if you wish for your personal information to remain confidential*

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Russell & Lisa Patterson
Triple Ace Inc.

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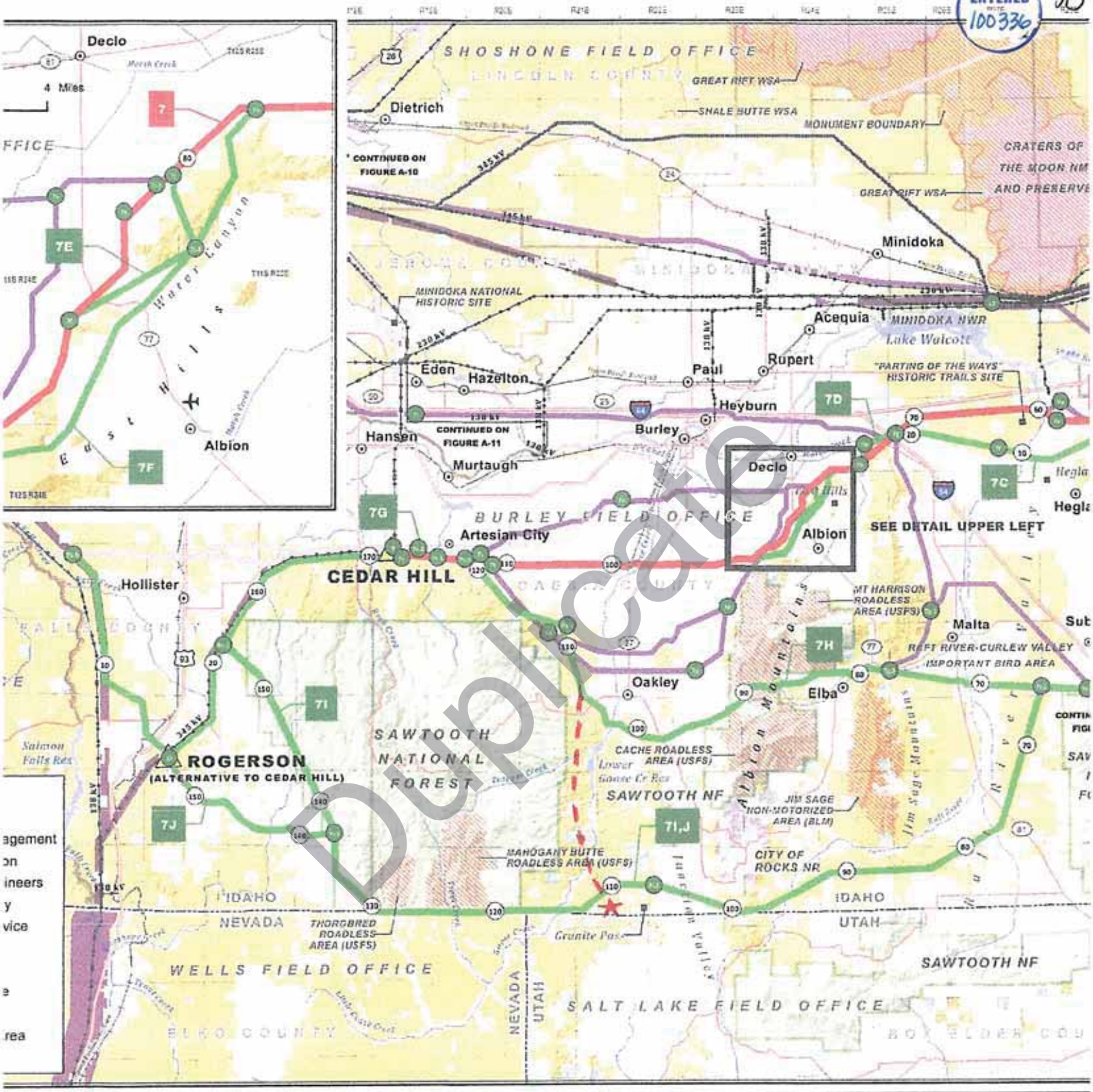

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Route Features
- Proposed Route
- Feasible Alternative
- Alternative Not Studied in Detail
- Other Route

- Reference Point
- Milepost
- Substation
- Existing Transmission Line
- West-Wide Energy Corridor

Political Features
- City/Town
- National Forest
- BLM Field Office
- State
- County

Other Featu
- Interst
- US Hig
- State/
- Railro
- Airport

★ New Proposed Route

Anadarko Petroleum Corporation
900 WERNER COURT, SUITE 200
CASPER, WYOMING 82601

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MAILED FROM ZIP CODE 82601

Mr. Walt George
Project Manager Gateway West Transmission Line
Project DEIS
Bureau of Land Management
P.O. Box 20879
Cheyenne, WY 82003

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Mr. Walt George
Project Manager Gateway West Transmission Line Project DEIS
Bureau of Land Management
P.O. Box 20879
Cheyenne, WY 82003

Gateway_West_WYMail@blm.gov

RE: Anadarko Petroleum Corporation Comments on the Gateway West Transmission Line Project Draft Environmental Impact Statement

Dear Mr. George:

Anadarko Petroleum Corporation (Anadarko) values the opportunity to respond to the July 29, 2011 Federal Register Notice of Availability for the Draft Environmental Impact Statement (DEIS) and potential Resource Management Plan amendments for the proposed Gateway West 230/500 kV Transmission Line Project (Project). This Project is located in portions of Wyoming, Idaho and Nevada. Within Wyoming, the Project encompasses portions of lands (surface and mineral) owned by either Anadarko or one of its subsidiaries and has the potential to substantially affect ongoing operations and prospective development of oil and natural gas and other mineral resources such as coal and trona.

In 2000, Anadarko acquired Union Pacific Resources. As a result of that acquisition, Anadarko owns significant surface and mineral interests in what is commonly referred to as the land grant which is almost 700 miles long and 40 miles wide and coincides with a portion of the Project in Wyoming. One of the land grant's obvious characteristics is the "checkerboard" pattern of land ownership where, generally, every other section is managed either by the Bureau of Land Management (BLM) or private interests. BLM authorizations for the Project in the checkerboard will impact Anadarko's current and prospective uses of its surface and subsurface properties.

For the Project as a whole, BLM manages 43.5 percent of the surface for which the Proponents will seek rights-of-way (ROW) authorizations.[1] In Segment 3, this percentage rises to 51.3 percent of the surface lands managed by BLM.[2] BLM's authorization, should it occur prior to completion of fee mineral and surface owner access agreements, will directly affect those entities in a disadvantaged manner. In this instance, Proponent negotiations with fee interest owners may be negatively influenced by virtue of the BLM granting ROW authorization. BLM states that it will analyze the circumstances under which private lands would be condemned, and what the effects would be.[3] However, we are unable to find this discussion in the document. Clearly, the specter that BLM would issue ROWs prior to completion of access agreements for private interests may exacerbate the need for condemnations. This very important aspect of authorizing the Project must be discussed in the document as well as providing an opportunity for public comment on that language in draft form.

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[1] Table ES-1. Page ES-5.
[2] Ibid
[3] 3.4.1.2 - Issues to Be Analyzed

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Additional information is needed regarding the economic impact resulting from the loss of opportunity to develop fee minerals caused by the Project. The document aims at resolving the document's lack of economic analysis on the impact to mineral resources by suggesting that the Proponents incorporate mitigation measure MN-2 into their Environmental Protection Measures (EPMs) and apply it Project-wide.[4] MN-2 states that, "An accounting of damages will be conducted by the Proponents to current operators to determine the potential loss of mineral resources. There may be mining claims under the 1872 Mining Law that would have precedence over the Project. Similarly, federal and state mineral lease agreements provide rights to lessees that could interfere with the Gateway West Project. The Proponents will resolve mineral claim and lease agreements prior to Project initiation, as with site access agreements on private property." Anadarko requests MN-2 be made a condition of approval for the ROW and furthermore, it should clearly state the "accounting of damages" should apply to all potentially recoverable minerals on federal, state and fee mineral resources and not just current mine operators. Resolution of private property mineral and access agreements should also be completed prior to authorizing BLM ROWs. Alternatively, the ROW grant should be conditioned to require the resolution of private property mineral and access agreements prior to initiation of construction activities.

Given past development trends and rapid advances in mining technologies, as is evidenced by recent shale plays around the country, Anadarko believes that it is highly probable that many portions of its lands potentially affected by the Project could be accessed, within the life of the project, for mineral development, especially coal, oil and natural gas. Placement of transmission lines over minerals has the potential to negatively impact their development in a number of ways as more fully discussed below.

Transmission lines sterilize all coal or other minerals directly beneath its ROW. Due to safety reasons, there could be no mining directly beneath the lands covered by the transmission lines and on those lands within a certain distance of the ROW, sterilizing even more coal. Oftentimes, blasting activities are required to produce coal and other minerals. However, blasting would not be able to occur under or near the transmission lines further severing Anadarko's access to its coal resources. If the ROW cuts through the middle of a mine site, it may sever mine operations thus increasing mining costs. For underground mines, the Project would sterilize the coal directly beneath the towers as well as a distance laterally. Therefore, an un-mined column must be left in place that is larger than the actual footprint of the tower. If mining were to occur via longwall methods, mine operators would probably be unable to leave columns beneath all of the towers. Additionally, due to the nature of longwall mining, the ground would most likely experience subsidence. Given this, longwall mining, a sometimes more cost effective mining method, would probably be impossible in the vicinity of the Project. BLM must fully take into consideration the economic loss the Project will have on the fee mineral holdings within the checkerboard given the likelihood that these holdings would be used for energy projects during the life of the Project.

Within the Checkerboard lands, the Gateway West Project area encompasses, among others, portions of the Rock Springs Uplift, Great Divide Basin, Kindt Basin as well as the Hanna Basin. These areas are highly prospective for, among other minerals, coal. Anadarko has coal projects in the Hanna Basin including Freezeout, Cyprus-Shoshone, Rosebud, Vanguard and Hanna coal regions. These projects contain several million tons of coal resources. West of there, Anadarko coal projects include Continental Divide, Red Rim, Bolten Ranch, Creston, Cherokee, Bitter Creek and Salt Wells. Within these areas are several hundred million tons of additional coal resources. Further west are the active underground trona mines near Green River. Each of these mines contains multiple millions of tons of trona. A transmission line across these mines could sterilize the trona beneath the line thus negatively impacting the mine operator as well as the mineral owner. Anadarko's status as a fee mineral and surface owner and affected

[4] 3.12.2.2 Effects Common to All Action Alternatives

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properties are noted because management decisions made on federal lands can and do impact current and future activities on fee lands.

To reduce the impact to Anadarko's interest we respectfully request:

1. BLM fully consider requiring shared infrastructure, where feasible, resulting in co-locating transmission lines on common towers/structures. This consideration should include the proposed Gateway South and TransWest Express Transmission Lines.
2. That the Project parallel existing transmission line corridors through the Checkerboard lands.
3. That construction of two parallel single-circuit lines should not be authorized due to a 25% to 30% increase of additional disturbance. A single structure should be used for these lines.
4. BLM address the steps it will take to preserve Anadarko's ability to access to its trona, coal, oil and natural gas resources and other surface and mineral resources. This should include requirements to relocate transmission lines and towers and/or subside the surface if necessary.
5. That BLM not issue ROWs until such time that there is resolution of private property mineral and access agreements within the Checkerboard lands.
6. That the Project follows established energy corridors.
7. BLM address, and provide the opportunity for public comment on draft language for the analysis regarding the circumstances private lands would be condemned, and what the effect would be.
8. That economic impact to federal, state and local taxes (ad valorem and severance) that results from loss of fee trona, coal, oil and natural gas production due to the Project be disclosed.
9. That mitigation measure MN-2 is made a condition of approval for the ROW and that the language is expanded to include all potentially recoverable minerals on federal, state and fee mineral resources.
10. BLM to require resolution of private property mineral and access agreements prior to authorizing BLM ROWs. Alternatively, the ROW grant should be conditioned to require the resolution of private property mineral and access agreements prior to initiation of construction activities.

Anadarko looks forward to working with BLM and the Proponent to maintain reasonable access to its subsurface resources to the greatest extent feasible. Should you require more information please contact me.

Sincerely,

Tom Clayson
Senior Staff Regulatory Advisor

"Clayson, Tom"
<Tom.Clayson@anadarko.com>

10/27/2011 03:15 PM

To "Gateway_West_WYMail@blm.gov" <Gateway_West_WYMail@blm.gov>
cc "Bell, Brooke" <Brooke.Bell@anadarko.com>, "Eades, Natalie" <Natalie.Eades@anadarko.com>, "Ballard, Don" <Don.Ballard@anadarko.com>, "Jordan, John (Land)"
bcc
Subject Gateway West DEIS Comments

Dear Mr. George, please accept Anadarko Petroleum Corporation's comments on the Gateway West Electric Transmission Line Draft EIS. I will also send, via U.S. Mail, a hard copy of our comments.

Please do not hesitate to contact me should you have any questions.

Thank you,

Tom Clayson
307 233-4503

Anadarko Confidentiality Notice: This electronic transmission and any attached documents or other writings are intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure. If you have received this communication in error, please immediately notify sender by return e-mail and destroy the communication. Any disclosure, copying, distribution or the taking of any action concerning the contents of this communication or any attachments by anyone other than the named recipient is strictly prohibited. Gateway West APC Comments_Final.pdf

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ANADARKO PETROLEUM CORPORATION

900 WERNER COURT, SUITE 200 • CASPER, WY 82601

October 27, 2011

Mr. Walt George
Project Manager Gateway West Transmission Line Project DEIS
Bureau of Land Management
P.O. Box 20879
Cheyenne, WY 82003

Gateway_West_WYMail@blm.gov

RE: Anadarko Petroleum Corporation Comments on the Gateway West Transmission Line Project Draft Environmental Impact Statement

Dear Mr. George:

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Additional information is needed regarding the economic impact resulting from the loss of opportunity to develop fee minerals caused by the Project. The document aims at resolving the document's lack of economic analysis on the impact to mineral resources by suggesting that the Proponents incorporate mitigation measure MN-2 into their Environmental Protection Measures (EPMs) and apply it Project-wide.[4] MN-2 states that, "An accounting of damages will be conducted by the Proponents to current operators to determine the potential loss of mineral resources. There may be mining claims under the 1872 Mining Law that would have precedence over the Project. Similarly, federal and state mineral lease agreements provide rights to lessees that could interfere with the Gateway West Project. The Proponents will resolve mineral claim and lease agreements prior to Project initiation, as with site access agreements on private property." Anadarko requests MN-2 be made a condition of approval for the ROW and furthermore, it should clearly state the "accounting of damages" should apply to all potentially recoverable minerals on federal, state and fee mineral resources and not just current mine operators. Resolution of private property mineral and access agreements should also be completed prior to authorizing BLM ROWs. Alternatively, the ROW grant should be conditioned to require the resolution of private property mineral and access agreements prior to initiation of construction activities.

Given past development trends and rapid advances in mining technologies, as is evidenced by recent shale plays around the country, Anadarko believes that it is highly probable that many portions of its lands potentially affected by the Project could be accessed, within the life of the project, for mineral development, especially coal, oil and natural gas. Placement of transmission lines over minerals has the potential to negatively impact their development in a number of ways as more fully discussed below.

Transmission lines sterilize all coal or other minerals directly beneath its ROW. Due to safety reasons, there could be no mining directly beneath the lands covered by the transmission lines and on those lands within a certain distance of the ROW, sterilizing even more coal. Oftentimes, blasting activities are required to produce coal and other minerals. However, blasting would not be able to occur under or near the transmission lines further severing Anadarko's access to its coal resources. If the ROW cuts through the middle of a mine site, it may sever mine operations thus increasing mining costs. For underground mines, the Project would sterilize the coal directly beneath the towers as well as a distance laterally. Therefore, an un-mined column must be left in place that is larger than the actual footprint of the tower. If mining were to occur via longwall methods, mine operators would probably be unable to leave columns beneath all of the towers. Additionally, due to the nature of longwall mining, the ground would most likely experience subsidence. Given this, longwall mining, a sometimes more cost effective mining method, would probably be impossible in the vicinity of the Project. BLM must fully take into consideration the economic loss the Project will have on the fee mineral holdings within the checkerboard given the likelihood that these holdings would be used for energy projects during the life of the Project.

Within the Checkerboard lands, the Gateway West Project area encompasses, among others, portions of the Rock Springs Uplift, Great Divide Basin, Kindt Basin as well as the Hanna Basin. These areas are highly prospective for, among other minerals, coal. Anadarko has coal projects in the Hanna Basin including Freezeout, Cyprus-Shoshone, Rosebud, Vanguard and Hanna coal regions. These projects contain several million tons of coal resources. West of there, Anadarko coal projects include Continental Divide, Red Rim, Bolten Ranch, Creston, Cherokee, Bitter Creek and Salt Wells. Within these areas are several hundred million tons of additional coal resources. Further west are the active underground trona mines near Green River. Each of these mines contains multiple millions of tons of trona. A transmission line across these mines could sterilize the trona beneath the line thus negatively impacting the mine operator as well as the mineral owner. Anadarko's status as a fee mineral and surface owner and affected

[4] 3.12.2.2 Effects Common to All Action Alternatives

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properties are noted because management decisions made on federal lands can and do impact current and future activities on fee lands.

To reduce the impact to Anadarko's interest we respectfully request:

1. BLM fully consider requiring shared infrastructure, where feasible, resulting in co-locating transmission lines on common towers/structures. This consideration should include the proposed Gateway South and TransWest Express Transmission Lines.
2. That the Project parallel existing transmission line corridors through the Checkerboard lands.
3. That construction of two parallel single-circuit lines should not be authorized due to a 25% to 30% increase of additional disturbance. A single structure should be used for these lines.
4. BLM address the steps it will take to preserve Anadarko's ability to access to its trona, coal, oil and natural gas resources and other surface and mineral resources. This should include requirements to relocate transmission lines and towers and/or subside the surface if necessary.
5. That BLM not issue ROWs until such time that there is resolution of private property mineral and access agreements within the Checkerboard lands.
6. That the Project follows established energy corridors.
7. BLM address, and provide the opportunity for public comment on draft language for the analysis regarding the circumstances private lands would be condemned, and what the effect would be.
8. That economic impact to federal, state and local taxes (ad valorem and severance) that results from loss of fee trona, coal, oil and natural gas production due to the Project be disclosed.
9. That mitigation measure MN-2 is made a condition of approval for the ROW and that the language is expanded to include all potentially recoverable minerals on federal, state and fee mineral resources.
10. BLM to require resolution of private property mineral and access agreements prior to authorizing BLM ROWs. Alternatively, the ROW grant should be conditioned to require the resolution of private property mineral and access agreements prior to initiation of construction activities.

Anadarko looks forward to working with BLM and the Proponent to maintain reasonable access to its subsurface resources to the greatest extent feasible. Should you require more information please contact me.

Sincerely,

Tom Clayson
Senior Staff Regulatory Advisor

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Bureau of Land Management
Gateway West Project
PO Box 20879
Cheyenne, WY 82003

ROCK SPRINGS, WY 82901
25 OCT 2011

USE FIRST-CLASS FOREVER

ENTERED
100411

Bureau of Land Management
Gateway West Project
PO Box 20879
Cheyenne, WY 82003

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ENTERED
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11718 Fontenelle Creek Road
Kemmerer, WY 83101
Oct. 24, 2011

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DOI-BLM-WYOMING
CHEYENNE, WYOMING

Bureau of Land Management
Gateway West Project
PO Box 20879
Cheyenne, WY 82003

To Whom It May Concern,

Please accept this comment on behalf of V Cross Cattle Company. We are a family-owned Wyoming corporation, owning and operating a cattle ranch on Fontenelle Creek. We are, of course opposed to the proposed northern alternative for the transmission line, and offer the following reasons:

This area is rich in Wyoming history—the creek bottom was homesteaded over 150 years ago. The Herschler family came here from Iowa in 1886, and we are proud to say that the sixth generation is still living and working here. The Sublette Cutoff of the Oregon Trail is just south of Fontenelle Creek, and there are many sites of Native American settlement nearby. We know that the existing transmission line enjoys many of the same historical benefits, but since it has already been disturbed, why not use it instead of destroying a new route?

We are deeply concerned about the potential damage to human and animal health. Research has proven that the EML and EMF contribute to childhood leukemia and chronic lymphocytic cancers. Ongoing research is questioning the possibility of high voltage transmission lines contributing to neurogenerative and cardiac diseases. Additionally, we are concerned that the lines will endanger the health of livestock and wildlife.

Most of the area encompassed by the proposed northern alternative is Sage Grouse Core Area, and also Critical Big Game Winter Habitat. One of Wyoming's "claim to fame" is our abundant wildlife, and we are opposed to implementation of anything that will compromise that status. We are blessed with large elk, mule deer and antelope herds, and a large and healthy moose population. Once again, the existing route possesses wildlife, but it has already been disturbed, so please use that route instead of a new one.

The word of the day seems to be "view shed", and we are hugely interested in, and protective of ours. The country in the proposal has few roads, little or no pollution, and minimal disturbance. This pristine, wide open space is what makes Wyoming unique. We believe that there is no justifiable reason to change this status with a high voltage transmission line.

In conclusion, the existing transmission route, also identified as a feasible alternative is the best choice for a transmission line. Please consider running the new line parallel to the existing route.

Thank you.

Sincerely,
Sue Hunt, Secretary
V Cross Cattle Company

100517

WEBB DAIRY, LLC
HEGLAR CREEK FARMS
HEGLAR HOLSTEINS, LLC
22 NORTH YALE ROAD
DECLO, ID 83323
(208)349-5740

September 20, 2011

To Whom It May Concern:

I wanted to write a letter expressing my feelings about the route of the transmission line thru Cassia County and why I feel the alternate route would be a much better alternative for our county. I understand why you want to take the route you have proposed, because of the expense and the easiness of the route. However, if it was just one line that was going through it wouldn't be a problem, but we are talking about multiple lines that will pass through our farm ground.

I have had the opportunity to travel across the United State lately. With what we are facing here in our county I have been very attentive to big transmission lines as I have traveled. One thing that I have noticed is that I have not seen a single large transmission line, there has also been at least up to five in one corridor. To say that there is only going to be one transmission line thru Cassia County, I think we are fooling ourselves.

Like I stated, we could work around one single line, but multiple lines will take up prime farm ground and would go right through the center of fields taking out current pivots. Once a corridor is established for large transmission lines, it will be impossible to fight against more coming. When we look at the alternate route and the additional cost of going the extra 35 miles around, it is minimal to what it will cost the farmers and the loss of prime farming ground if you keep with the proposed route.

As we watch our politicians making decisions today common sense does not always play a part in it. So, let's not only look at our bottom lines, but lets look at the people it affects and find a plan, like the alternate route, that works good for the future.

Sincerely,

Mark A. Webb,
Owner

Mark A Webb

100100

From: _____
To: blm@gwcomment.com;
Subject: Fw: Gateway West EIS Comments
Date: Wednesday, August 10, 2011 7:17:46 AM

----- Forwarded by Joy Mclain/WYSO/WY/BLM/DOI on 08/10/2011 08:15 AM -----

"T LaMar Willis" <LaMar.Willis@comcast.net> 08/04/2011 06:28 PM

To <gateway_west_wymail@blm.gov>
cc "'lois lawler'" <lawler70@wctatel.net>, <jaynalene.williams@usbank.com>, "'c summers'" <cdghq@msn.com>
Subject Gateway West EIS Comments

Dear Sir:

I have reviewed the Gateway West EIS as the Trustee for Willis Family Farm in Twin Falls County.

I highly recommend option the Twin Falls alternative routing for the East-West corridor labeled as 7J. This route obviates the socio-economic impact to the numerous privately held farms that otherwise would be impacted by the proponents proposed corridor. The small farmers are the backbone of Idaho's largely agrarian economy but suffer as the least powerful lobby. Small, family owned farms have been a large contributor to the American way of life but they are under increasing attack from development encroachment, rising costs and poor crop prices.

The Gateway West project must not be allowed to further assault the small farm owners when feasible alternative routing is available.

Thank you for your consideration.

T. LaMar Willis
4374 Windermere View Place
Prince William, VA 22192
LaMar.Willis@comcast.net